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Organization: F.H. Stoltze Land & Lumber co.

Title:

Comments: Please see attached comments

On behalf of F.H. Stoltze Land & Lumber Company, please accept the following comments and suggestions on the Batch 2 revisions to Forest Service Manual and Forest Service Handbook documents.

As active members of the Federal Timber Purchasers Committee, we fully support the detailed comments submitted by the organization and by reference and attachment submit the same on behalf of F.H. Stoltze Land & Lumber Co. as substantive comments on detailed changes in the handbook.

In addition to the comments submitted by attachment, please consider the following specific comments on Batch 2 Updates on behalf of Stoltze. These comments are intended to implement the changes in the MOU between the Small Business Administration and USFS dated April 3, 2020 into the necessary handbook and/or manual provisions. Specifically reference Sec 5 of said MOU, reading in part: "The

Forest Service will afford SBA the opportunity to review prior to public announcement all proposed sale programs involving sales with an estimated value of \$2,000 or more, including set-asides proposed by the Forest Service. Timber volume sold under Stewardship Integrated Resource Timber Contracts will be included in the market share calculations and in calculation of the set aside trigger[...]"

To that end, please adopt the following recommended changes to FSH 2409 [dash] 19 Chapter 60:

Pg. 44: 61.8 - Small Business Administration Set Aside Program and Special Salvage Timber Sale (SSTS) Program

Invite field representatives of the Small Business Administration (SBA) to participate in stewardship contracting projects. The SBA has access to information about capabilities of small businesses that may be important to implementation of the projects and can provide an important link to small businesses during the selection and design of projects. Provide an electronic copy of stewardship contract solicitations and awarded contracts to SBA field representatives.

To ensure there is opportunity for use of local small business sawmills, make certain that the request for proposals for stewardship contracting projects considers technical evaluation criteria that give weight for use of local businesses, including small business sawlog mills. When defining the evaluation criteria, give additional weight to those proposals that are responsive to the local community's needs.

Include stewardship contracts and agreements in the timber sale set-aside program. Track the volume of all sawlogs in stewardship contracts and agreements on form FS- 2400-31a as normal volume and include it in all SBA program calculations. Track the sawlog volume going to small and large businesses and to manufacturers and non-manufacturers, as defined in FSH 2409.18, chapter 90.

Use this information to track "trigger" of the SBA set aside. Also consider using Stewardship contracts in periods of program trigger to satisfy the 20% open sale requirements when necessary. Also use this information at the end of the scheduled 5-year recomputation of shares for the timber sale set-aside program to determine if changes are needed in the share percentages.

Pg. 48 62-Exhibit 01-Continued Stewardship Contract and Agreement Use Matrix

Revise said matrix specifically the line item titled [ldquo]SBA Set-Asides[rdquo] and change the entry under the heading [ldquo]Integrated Resource Timber Contract (IRTC) FS-2400-13 Scaled and FS-2400-13T Tree Measurement[rdquo] to [ldquo]YES[rdquo]

The issue of including USFS timber sale volume sold through the Good Neighbor Authority process in the SBA timber sale set aside program must be addressed in the new FSH [ndash] 2419- Chapter 80. Please adopt the following changes to said handbook:

Pg. 13 81-Exhibit 01- Tool Selection Matrix

Revise said matrix specifically the line item titled [ldquo]SBA Set-Aside[rdquo] and change the entry under the heading [ldquo]Good Neighbor Agreement[rdquo] to [ldquo]YES[rdquo]. Also change the entry under the heading [ldquo]Stewardship Contract[rdquo] to [ldquo]YES[rdquo].

NEW SECTION Pg. 15: 81.4 - Small Business Administration Set Aside Program and Special Salvage Timber Sale (SSTS) Program

Invite field representatives of the Small Business Administration (SBA) to participate in GNA projects. The SBA has access to information about capabilities of small businesses that may be important to implementation of the projects and can provide an important link to small businesses during the selection and design of projects. Provide an electronic copy of GNA contract solicitations and awarded contracts to SBA field representatives.

Include GNA contracts in the timber sale set-aside program. Track the volume of all sawlogs in GNA contracts on form FS-2400-31a as normal volume and include it in all SBA program calculations. Track the sawlog volume going to small and large businesses and to manufacturers and non-manufacturers, as defined in FSH 2409.18, chapter 90.

Use this information to track [ldquo]trigger[rdquo] of the SBA set aside. Also consider using GNA contracts in periods of program trigger to satisfy the 20% open sale requirements when necessary. Also use this information at the end of the scheduled 5-year recomputation of shares for the timber sale set-aside program to determine if changes are needed in the share percentages.

Conclusion:

It is imperative to the successful implementation of the Small Business Set Aside program that ALL timber volume sold from USFS managed lands are included in the program. This is clearly the intent of the MOU between USFS and SBA, most recently updated in April of 2020. The above referenced changes to the Forest Service Handbook are critical to meeting the intent of the program and MOU.

Once again, we want to endorse and re-submit as comments from Stoltze the detailed comments submitted by the Federal Timber Purchaser[rsquo]s Committee attached hereto. We appreciate the opportunity to review the proposed changes and provide comment. Please do not hesitate to contact me with any questions or for clarification. We look forward to your response to our comments and tracking progress on adoption and implementation of the revisions.

Incorporate by reference: Federal Timber Purchasers Committee comments submitted 2/16/2021