



December 8, 2022

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The Honorable Judge Channing Strother
Office of Administrative Law Judges
United States Department of Agriculture
1400 Independence Ave., S.W.
Stop 9202, Room 1049, South Building
Washington, D.C. 20250-9202

RE: Docket number: 22-J-0052, Bell Timber Sourcing Area Application

Dear Honorable Judge Strother,

Stella-Jones is a leading manufacturer of wood utility poles with timber procurement activity and manufacturing facilities within the economic footprint of Bell Timber's application. Stella-Jones has the following comments on Bell Timber's application.

- The footprint analysis is incomplete and not economically separate from Bell's Idaho operations.
 - Bell Timber's Idaho facility at Oldtown, Idaho is on the state line between Idaho and the eastern Washington footprint Bell proposes to export from. Bell sources timber from eastern Washington (Western Red Cedar and Western Larch) for their Oldtown, Idaho facility, which can be verified with public documents from the Washington DNR timber sales office at Colville. The eastern Washington footprint is not separated economically from Bell's or Stella-Jones' Idaho facilities.
- The footprint which Bell intends to export from in eastern Washington has Ponderosa Pine equivalent to states like Arizona, within the Sourcing Area, which are much further from Bellingham and Longview. Further explanation is needed as to how the Ponderosa Pine in eastern Washington is economically separate from Bellingham and Longview while Ponderosa Pine in states like Arizona are economically attached to Bellingham and Longview.

Timber continues to be in short supply as evidenced by recent records in the lumber market. Export of unprocessed timber from within an economic region has an impact by reducing the cumulative available timber for domestic processing, both directly and indirectly as some products use a range of species and quality.

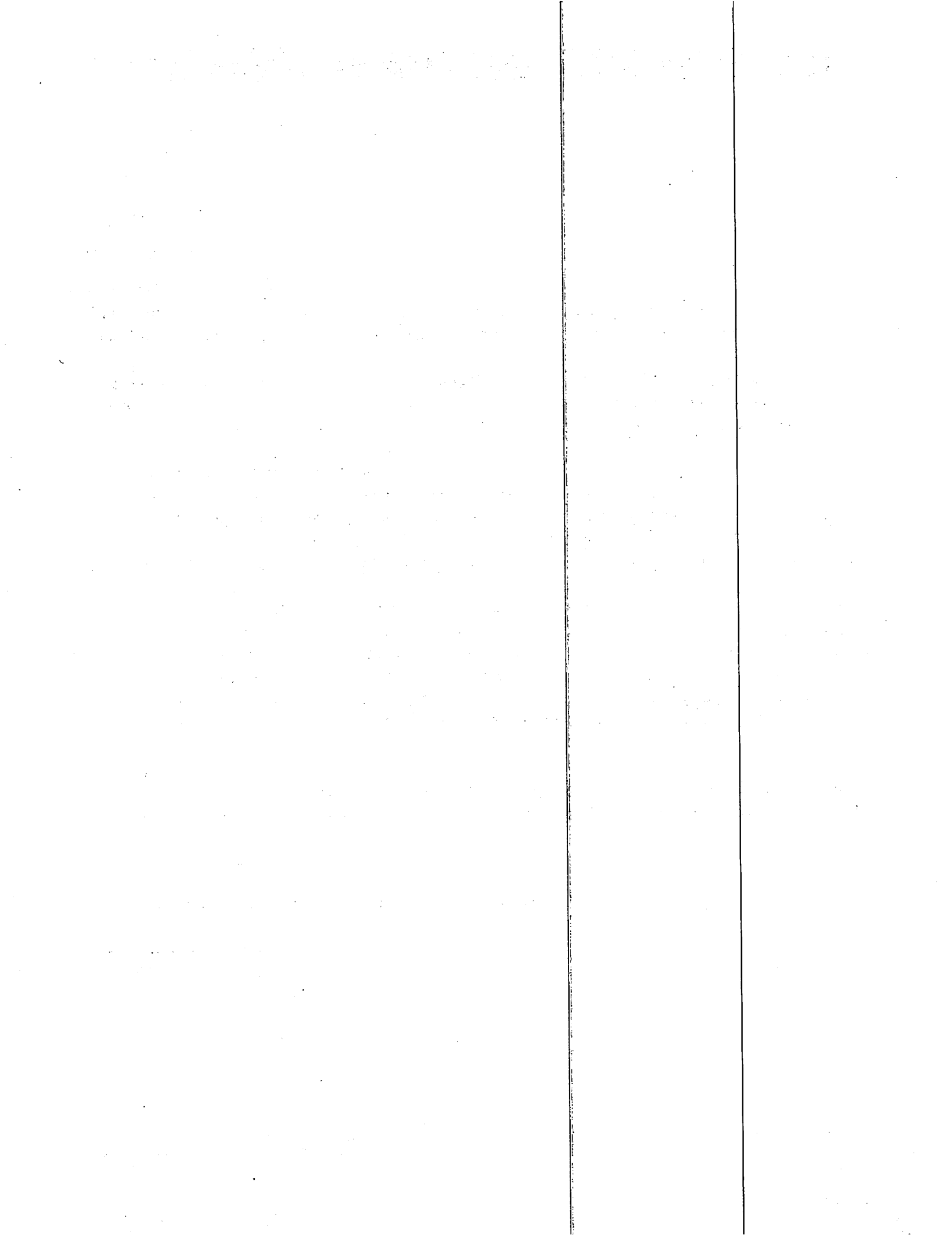
I certify that the information provided by me is true and accurate, to the best of my knowledge, and I understand that failure to provide true and accurate information could be violation of the False Statements Act (18 U.S.C. 1001).

Respectfully Submitted,

Jon Younce

Vice President

Email: jyounce@stella-jones.com cellular : 425-388-1440



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