

The Supporting Statement for OMB 0596-0010

Forest Industries Data Collection

October 2006

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the collection of information.**

The Forest and Rangeland Renewable Resources Research Act of 1978 (PL 95-307) assigned responsibility for the inventory of timberland resources to the USDA Forest Service. Specifically, the legislation calls for: (1) an analysis of present and anticipated uses, demand for, and supply of the renewable resources of the Nation's forest and rangelands, and (2) an inventory, based on information developed by the Forest Service and other federal agencies, of present and potential renewable resources.

Under the Forest and Rangeland Renewable Planning Act of 1974 (PL 93-378), the Secretary of Agriculture is:

“authorized and directed to make and keep current a comprehensive survey and analysis of the present and prospective conditions and requirements for the renewable resources of the forest and rangelands of the United States...and of the supplies of such renewable resources, including a determination of the present and potential productivity of the land, and of such other facts as may be necessary and useful in the determination of ways and means needed to balance the demand for and supply of these renewable resources, benefits and uses meeting the needs of the people of the United States.”

The current consumptive and non-consumptive timber use levels from public and private lands are a necessary factor in this assessment.

In most southern states, the value of the timber products is ranked either first or second in relation to other major agricultural crops. In addition, in the southern United States, forest industries employ more people and provide more wages than any other region of the United States.

Monitoring of the forest products industry and development historical trend data helps the Forest Service predict future demands and supply of timber and forest products. The collection of this data, as well as data from other studies, enables a more complete analysis of the current and future resource supply. Up-to-date knowledge of the status of the Nation's renewable wood resources (including demand and supply) assists Forest Service in development of plans and the making of decisions.

The information from this study (and others) is essential to the timber industry. Experience has shown that timber industry development is dependent on the availability of adequate information concerning the current and projected timber resources in proximity to anticipated development projects. The collection and

dissemination of this information by the Forest Service assures that adequate data is available for all owner groups and for all regions of the country, and that the database is complete and unified.

2.

3. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.**

a. **What information will be collected - reported or recorded?**

The information collected includes the types, species, volumes, and sources of the timber products harvested throughout the United States.

Specifically, respondents answer questions regarding:

- The type of logs or wood chips that have been harvested,
- The volume of logs or wood chips that have been received by the mill,
- The geographic locations from which the logs or wood chips have been harvested,
- The variety of tree species that have been harvested and received by the mill,
- The prices the mill has paid for logs or wood chips, and
- The volume of byproducts that have been produced because of the manufacturing process, such as bark, sawdust, and slabs.

b. **From whom will the information be collected? If there are different respondent categories (e.g., loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.**

Information is collected from forest product and other primary wood-using industries throughout the United States.

Data collection questionnaires are sent to primary wood-using mills including small, part-time mills as well as large corporate entities that use harvested wood in log or chip form, such as sawlogs, veneer logs, pulpwood, and pulp chips, to manufacture a secondary product, such as lumber or paper.

The *Pulpwood Received Questionnaire* is sent annually in a complete mail canvass of pulpwood producers in the United States. The form is completed by all mills and provides an annual barometer of timber industry activity, as well as information specific to current pulpwood demand.

The *Logs and Other Roundwood Received Questionnaire* is used to canvass all primary wood products industries in an individual state.

c. **What will this information be used for - provide ALL uses?**

The data collected is used to provide current essential information and analyses on the drain and supply of the Nation's timber resources for use as industrial products as required by the Resources Planning Act (RPA) of 1974 (PL 93-278) and the Renewable Resources Research Act of 1978 (PL 95-307).

Specifically, the information is used to identify current and potential timber supply problems and opportunities. This enables the development or modification of both public and private forest management programs and investments.

The *Pulpwood Received Questionnaire* provides an annual barometer of timber industry activity as well as information specific to current pulpwood demand.

The information is used by state foresters and the U.S. Forest Service in the development of state forest resource plans. General uses of the data are:

- Provides information describing the timber resource and its use in detail,
- To evaluate trends in resource use,
- To forecast future anticipated level of drain on the resource, and
- To analyze the ramifications of any changes in timber drain (demand).

Specifically the data is used in conjunction with economic indicators by:

- State foresters and the Forest Service in the development of state forest resource and economic development plans,
- All levels of the Federal government in the development of policy,
- The timber industry to develop long-range plans, make decisions, and identify raw material problems and opportunities,
- State government and industry to develop specific economic development plans for new forest-related industries, and
- Forestry and economic development agencies, as well as experts in the private sector.

- d. **How will the information be collected (e.g., forms, non-forms, electronically, face-to-face, over the phone, over the Internet)? Does the respondent have multiple options for providing the information? If so, what are they? Include FS file code and retention period for all information collected.**

The information is collected by one agency (the Forest Service) using standardized questionnaires that ensure uniformity of results and places the minimum burden on the public. For the most part, questionnaires will be mailed to mills in a number of different states in a given calendar year. The number of mills receiving a questionnaire varies as new mills come on line and existing mills close temporarily or go out of business. The number also varies by which states are scheduled to be canvassed in a particular year. When indicated, follow-up visits to obtain the information will be scheduled.

The *Pulpwood Received Questionnaire* is sent annually in a complete mail canvass of pulpwood producers in the United States. The form is completed

by all mills and provides an annual barometer of timber industry activity as well as information specific to current pulpwood demand.

The *Logs and Other Roundwood Received Questionnaire* is used to canvass all primary wood products industries in each state, and is conducted (at a minimum) every 10 years for a given state. In some regions, the canvass is done entirely by mail. In other regions, all mills are visited by cooperating state and/or Forest Service personnel trained in the collection of the data. Follow-up visits are sometimes necessary. In most regions, the majority of the larger mills have been contacted concurrently with the state forest resource inventory. In the Southeast, data is collected more frequently due to an increased demand for information.

e. **How frequently will the information be collected?**

The *Pulpwood Received Questionnaire* is sent annually in a complete mail canvass of all pulpwood producers in the United States.

The *Logs and Other Roundwood Received Questionnaire* is used to canvass all primary wood products industries in each state, and is conducted (at a minimum) every 10 years for a given state (i.e. in any given year 1/10 of the states will be canvassed). In the Southeast, data is collected more frequently due to an increased demand for information.

f. **Will the information be shared with any other organizations inside or outside USDA or the government?**

The results of these canvasses will be published as *Research Notes and Resource Bulletins*. Such reports will contain tabular summaries of the information collected along with appropriate analysis of the information and impacts on particular resource supply and demand situations. Compiled and summarized results may be made available over the internet and will be available by contacting Forest Inventory and Analysis (FIA) units at each experiment station. In some instances, data may be retrieved and summarized for specific groups of counties or regions, for specific products, or for a specific size-class of mills. Data may be presented in both graphic and tabular form. Each unit has individual versatility in the ways data may be presented and analyzed.

The collected information is shared with state, regional, and national policy makers and program developers. In addition, the results are published as *Forest Service Research Notes and Resource Bulletins*. Compiled and summarized results may be made available over the internet and will be available by contacting at each experiment station. In some instances, data may be retrieved and summarized by specific counties or regions, by specific products, or by a specific size-class of mills. Data may be presented in both graphic and tabular form.

g. **If this is an ongoing collection, how have the collection requirements changed over time?**

The collection requirements have not changed over time, though the questionnaires have evolved. The attached questionnaires have been developed over time with the cooperation of representatives of State forestry

organizations and various primary wood using industries. Modifications, additions, and deletions have been based on respondent comments during the past decades of use and by identifying information needs. In their present form, the questionnaires are easily completed. Since the questionnaires are essentially the same as those previously used, it will not be necessary to pre-test before additional use.

4.

5. **Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g. permitting electronic submission of responses, and the basis for the decision for adopting this means of collection. Also, describe any consideration of using information technology to reduce burden.**

No improved information technology exists to reduce burden on respondents beyond that already in use. No technical or legal obstacles are interfering with burden reduction.

6. **Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

This specific data is not available from any other source or study. No other Federal or state mandate or procedure assures the consistency and continuance of the information collected; or that the information is available to Federal, state, and private policymakers on a continuing and timely basis as called for by the Resources Protection Act (RPA).

Close contact between personnel from the U.S. Forest Service Research Stations, other Federal agencies, state forestry services, state agricultural extension offices and universities keeps Forest Service personnel aware of other studies or surveys that might accomplish the objectives of this data collection. As available, alternative information is used to avoid duplication and minimize the public's burden.

The Forest Service and state agencies cooperate in collecting this information. Sharing the collection burden and study results with state forestry personnel eliminates duplication of effort and the burden on the public. Some formal agreements exist between state agencies, the Forest Service, and other federal agencies outlining cooperative responsibilities in the collection and dissemination of data.

7. **If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.**

While this information collection does have an impact on small businesses and other small entities, the questionnaires are designed to minimize this burden. As the size of the form decreases, so does the burden. In addition, canvassing small mills often involves personal contact with either state or federal employees in the data collection phase of the project. These persons often assist mill owners or managers in the completion of the questionnaires. Addressed, stamped envelopes are provided for the return of mailed questionnaires.

8. **Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as**

any technical or legal obstacles to reducing burden.

The Forest Management Act of 1976 states that: “to serve the national interest, the renewable resources program must be based on a comprehensive assessment of present and anticipated uses, demand for, and supply of renewable resources from the Nation’s public and private forest and rangelands...” To assure the necessary data is available for the periodic national assessments required by the RPA, the Forest Service needs:

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- A current comprehensive inventory and analysis of the resources; and
- The development and application of current and scientific knowledge to support the inventory and analysis.

Because of increasing domestic and world demand for solid wood and wood fiberboard products, states are requesting assessments more frequently to better monitor events and changes. The availability of this information when needed provides numerous entities (Federal and state agencies, legislators, industrial firms and associations, colleges and universities, congressional staffers, and researchers) insight into national and regional trends in timber resource use and industry development. This information influences the policy decisions of the legislature and executive branches of Federal and state governments, as well as the timber industry.

9. **Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- **Requiring respondents to report information to the agency more often than quarterly;**
- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- **Requiring respondents to submit more than an original and two copies of any document;**
- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**
- **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
- **That includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- **Requiring respondents to submit proprietary trade secret, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

Data collection is consistent with the guidelines in 5 CFR 1320.6. Respondents are not required to meet special conditions or record keeping requirements, nor are they given remuneration for their response.

10.

11. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8 (d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.**

The Federal Register 60-day Notice for the renewal of this information collection was published on Friday, May 12, 2006, in Volume 71, on pages 27669-27670. One comment was received from Jean Public on May 12, 2006, and reads as follows:

“Fed Reg Doc E6-7278, USDA FS OMB 0596-0010, Survey of Paper Needs from Nationally Owned by Taxpayer Forests”

“I oppose taking this survey. Why should general taxpayers of this nation have to take a survey to service logging profiteers. [sic] I think the spending of general tax dollars on this is unconscionable.

“Our forests are all being cut down on unscientific basis so that campaign donors get what they want from the corrupt Washington bureaucracy and I don't [sic] like this one bit.

“National taxpayers, who own this land have been paying for eons to save forests. Our forests are not lumberyards in waiting for donors to corrupt Washington and local politicians.

“I oppose this survey. This is a waste of tax dollars.”

“B. Sachau, 15 Elm St., Florham Park, NJ 07932”

The Forest Service took no actions in response to this comment.

Describe efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and record keeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

The Forest Service contact eight previous respondents and asked them for comments on this information collection. Specifically, they were asked the following:

- *How would you rate data availability: __Good __Fair __Poor*
- *How would you rate questionnaire clarity? __Good __Fair __Poor*
- *How would you rate client service? __Good __Fair __Poor*
- *Issues or concerns about data security?*

The following responses were received:

Client	How would you rate data availability?	How would you rate questionnaire availability?	How would you rate client service?	Issues or concerns about data security?
Larry Lowe Timber Harvest Compliance Section Supervisor Kentucky Division of Forestry 627 Comanche Trail Frankfort, KY 40601	Good	Good	Good	None
Bill Burris-Wood Procurement Manager Weyerhaeuser Corp. 100 Clinchfield Street Kingsport, TN 37660	Good	Good	Good	I feel good due to the experience of the current personnel handling the data.
Nathan Smith South Carolina Forestry Commission P.O. Box 217071 Columbia, SC 29221	Good	Fair	Good	Security needs to be improved, but I am uncertain on how to approach this issue without hampering already challenging data gathering methods. Data availability and client service are superb. Interpreting questionnaire questions (especially those about residues) can be difficult to understand if the client does not work frequently with the questionnaire information.
Richard Bohnen-Region Analyst Georgia-Pacific Corp. 1080 River Oaks Drive Jackson, MS 39232	Good	Good	Good	No issues with data security. Assume that confidentiality of individual mill information is maintained.
Bernie Coyle Wood Procurement Manager New Page Corporation 1724 Westvaco Road Wickliffe, KY 42087	Fair	Good	Good	None
John Wells Staff Forester Georgia Forestry Commission P.O. Box 819 Macon, GA 31202-0819	Good	Good	Good	None
Elizabeth van Tilborg Region Analyst Georgia Pacific Corporation P.O. Box 860 Brunswick, GA 31521	Good	Good	Good	None
Doug Schnabel Forest Business Specialist Tennessee Division of Forestry P.O. Box 40627 Melrose Station Nashville, TN 37204	Good	Good, could stand some redesign.	Excellent	Have not had a problem in the past. We make sure that the information that might be sensitive is not shared with anyone, for example number of employees or production volumes.

Note: The Forest Service will take these remarks into consideration in future renewals of this information collection.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

There are no special circumstances requiring collection inconsistent with 5 CFR 1320.6.

12. Explain any decision to provide any payment or gift to respondents, other than re-enumeration of contractors or grantees.

No payments or gifts are provided to respondents. Participation in this collection of information is strictly voluntary.

13. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy. Include Privacy Act System of Records that covers this information (if applicable).

The Freedom of Information Act (5 U.S.C. 552) governs the confidentiality to be provided for information received by the Forest Service. This information collection is not covered by a Privacy Act System of Records.

14. Provide additional justification for any questions of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

There are no questions of a sensitive nature, such as those pertaining to sexual behavior, attitudes, religious beliefs, or other matters commonly considered private.

15. Provide estimates of the hour burden of the collection of information. Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

Statistics pertaining to number of respondents and burden by each form used by each of the five experiment stations are given in Table 1. The burden is

calculated at 0.50 hours for Pulpwood Received and 0.84 hours for Logs and Other Roundwood Received, and with one annual response per respondent. These estimates were developed from experience and consultations with Station personnel, past and potential industry respondents, State Forestry personnel, and forest products personnel familiar with these similar forms. Past respondents were also questioned regarding the time taken to complete specific forms. One of the best continuing tests has been the voluntary completion of a form by a former non-respondent. The wide variation in time required to complete the forms is due to differences in the length and detail of the forms based on the type of industry contacted; the type, volume, and species of the timber product used; user classes; and other information sought from each class of respondent and type of form.

- a) Description of the collection activity**
- b) Corresponding form number (if applicable)**
- c) Number of respondents**
- d) Number of responses annually per respondent,**
- e) Total annual responses (columns c x d)**
- f) Estimated hours per response**
- g) Total annual burden hours (columns e x f)**

Table 1 -

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents	(d) Number of responses annually per Respondent	(e) Total annual responses (c x d)	(f) Estimate of Burden Hours per response	(g) Total Annual Burden Hours (e x f)
Pulpwood Received	N/A	188	1	188	30 minutes (0.5 hour)	94
Logs and Other Roundwood Received	N/A	1,628	1	1,628	50 minutes (0.84 hour)	1,462
Totals	---	1,816	---	1,816	---	1,462

Record keeping burden should be addressed separately and should include columns for:

- a) Description of record keeping activity:** None
- b) Number of record keepers:** None
- c) Annual hours per record keeper:** None
- d) Total annual record keeping hours (columns b x c):** Zero
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 2

(a) Description of the Collection Activity	(b) Estimated Total Annual Burden on Respondents (Hours)	(c) Estimated Average Income per Hour	(d) Estimated Cost to Respondents
Pulpwood Received	94	13.23	\$ 2,487
Logs and Other Roundwood Received	1,368	22.23	\$ 36,190

Totals	1,462	---	\$38,677
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1)

16. **Provide estimates of the total annual cost burden to respondents or record keepers resulting from the collection of information, (do not include the cost of any hour burden shown in items 12 and 14). The cost estimates should be split into two components: (a) a total capital and start-up cost component annualized over its expected useful life; and (b) a total operation and maintenance and purchase of services component.**

The information collection and the data questions are such that no capital/startup costs are incurred; and that the respondents, other than the burden, incur no special equipment, personnel, or service costs.

17. **Provide estimates of annualized cost to the Federal government. Provide a description of the method used to estimate cost and any other expense that would not have been incurred without this collection of information.**

The response to this question covers the actual costs the agency will incur as a result of implementing the information collection. The estimate should cover the entire life cycle of the collection and include costs, if applicable, for:

- **Employee labor and materials for developing, printing, storing forms**
- **Employee labor and materials for developing computer systems, screens, or reports to support the collection**
- **Employee travel costs**
- **Cost of contractor services or other reimbursements to individuals or organizations assisting in the collection of information**
- **Employee labor and materials for collecting the information**
- **Employee labor and materials for analyzing, evaluating, summarizing, and/or reporting on the collected information**

Planning	\$ 22,455
Printing	6,040
Forms (includes changes to forms)	
Corresponde nce/ Postage/ Mailing,	5,405
Canvass/ Follow-up	49,515
Editing,	157,254

coding, tabulating, analysis, writing	
Printing/ publishing	45,846
Disseminatio n/Mailing	6,307
Training and Miscellaneou s	<u>19,520</u>
	Total
	\$312,34 2

18. Explain the reasons for any program changes or adjustments reported in Items 13 or 14 of the OMB Form 83-1.

This is a revision of a previously approved information collection package. The estimated total burden of 1,462 hours (Table 1) is a decrease of 234 burden hours from the previously approved collection. The change is the result of a decrease of burden in the North Central Region, Southern Region and the Pacific Northwest Region. The decrease is the result of the concentration of annual production into fewer but larger mills.

19. For collections of information whose results are planned to be published, outline plans for tabulation and publication.

Data are summarized by various response categories, providing information by location, species, product, and categories. This information is compared, contrasted, and evaluated with earlier collections, timber resource supply statistics, and industrial output information.

The results of this information collection will be published as *Forest Service Research Notes* and *Resource Bulletins*. The reports will contain tabular summaries of the information collected along with appropriate analysis of the information and impacts on particular resource supply and demand situations. Compiled and summarized results may be provided available over the internet and will be available by contacting at each experiment station. In some instances, data may be retrieved and summarized by specific counties or regions, by specific products, or by a specific size-class of mills. Data may be presented in both graphic and tabular form. Each unit has individual versatility in the manner in which data is presented and analyzed.

20. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.

The expiration date for the OMB approval will be displayed on the forms.

21. Explain each exception to the certification statement identified in Item 19 "Certification for Paperwork Reduction Act."

The agency is able to certify that the collection of information encompassed by this request complies with 5 CFR 1320.

B. Collections of Information Employing Statistical Methods

This collection does not employ statistical methods.