

**Information Collection, OMB #: 0596-0167, Urgent Removal of Timber**

**Documentation of consultation with Larry Duysen, of Sierra Forest Products by Contracting Officer Paul S. Miller.**

**Sierra Forest Products purchased approximately 35,574 Mbf of salvage timber from private land in Southern California, specifically Riverside, San Bernardino, and San Diego Counties. This occurred during the time periods, 2002 through 2006.**

*The availability of data,*

*Sierra Forest Products (SFP) indicated that the data was readily available. Data gathering consisted of asking salvage loggers from San Bernardino, Riverside and San Diego counties where the salvage logs came from, eg. private land or national forest land.*

*Frequency of collection,*

*Sierra Forest Products would compile scale data twice a month to track delivered volume from the identified salvage sales. SFP estimates that this took 20 minutes per month. or 4 hours per year.*

*The clarity of instructions,*

*Sierra Forest Products stated that the Contracting Officer's request for information and instructions on how to submit extensions requests, were clear.*

*Record keeping responsibilities,*

*Sierra Forest Products record keeping consisted of creating and updating a spreadsheet to track and account for salvage volume received from the three (3) Southern California counties affected by the Catastrophic drought induce mortality.*

*Disclosure,*

*Disclosure came in the form of a letter to the Contracting Officer accompanied by the data spreadsheet.*

*Reporting Format,*

*Sierra Forest Products used a letter every six (6) months to request contract term extensions. The letter was supported by the above mentioned spreadsheet.*

*Data elements to be recorded, disclosed, or reported,*

*The letter coupled with the spreadsheet, provided both a request for extension and documentation that their mill capacity was being impacted by the influx of salvage from non National Forest System lands.*

*Sierra Forest Products lumped these last four questions into a single time estimate. SFP, every 6 months would populate a spreadsheet which contained information such as the Logger, Sale Name, Volume in Mbf and County from which salvage was harvested. In addition, SFP would write a letter every 6 months formally requesting contract term extensions based on 36 CFR 223.53. As documentation, SFP would enclose an accounting of the salvage logs received from the Southern California counties. This would be in the form of the spreadsheet mentioned above. Sierra Forest Products estimates that it required 45 minutes every 6 months to complete these tasks. Annual burden for items 4-7 is 1 hour and 30 minutes.*

*Sierra Forest Products was made aware that our consultation and their response to this data call would be part of the official record. The total annual burden upon the respondent mentioned above is 5 hours and 30 minutes.*

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06/22/2009 05:57 PM To  
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cc

bcc

Subject  
Comments concerning 36 CFR 223.53

I interviewed two parties. Jared Tappero, and Jay Francis, Forester's from Collins Pine in Chester, CA, were the first contacts. Bruce Olsen from Franklin Logging Inc in Bella Vista, CA was the second party interviewed. Collins Pine did request and receive an extension based on urgent need to harvest about 3 years ago. Franklin has never requested an extension based on urgent need of harvest.

Collins Pine, Chester, CA

The information requested from the FS was relatively easy to obtain but was depended on how accurate the data was from the private landowners inventory. Large commercial timber companies normally have accurate inventories and therefore their estimated volumes coming off their lands is reasonably accurate. Small land owners not in the timber business, like ranchers, do not have accurate inventories and require the purchasing mill to send in Foresters to try to obtain a sample cruise to estimate volume so mill can control volume coming into the mill.

Normally mills must control inventory so no more timber is brought in during the season than is planned to be sawed during the year. It is harder to estimate volume coming into the mill from a salvage sale since there are many variables such as quality of timber, how quickly it is deteriorating, how efficiently is it being logged, etc. Normally a mill receives from the scaling company bimonthly reports. The mill can request data more often at a cost. The mill has a good feel for how many logging sides are necessary to have operating to assure adequate volumes are delivered to the mill. As a result it is relatively easy to accurately articulate to the FS on how logging capacity can be exceeded by logging both private salvage and green FS volume. There is no accurate way to show how this is done other than to explain to the FS what a mills logging capacity is since there is no documentation that clearly demonstrates their situation.

It takes about one day to pull the data together to request an urgent need of harvest extension. It is still rather subjective on the part of the FS on whether or not the company requesting the extension has provided a compelling argument to meet the criteria in 36CFR 223.53 to obtain an extension.

Franklin Logging, Bella Vista, CA

I interviewed Bruce Olsen and he was not as cooperative as Collins Pine. He can be very critical on how the FS conducts business and you can see by the quality of his response that he is not a fan of the process.

The proposed collection of information is not necessary to make an

informed decision, and it certainly does not have any scientific utility. The Regional Forester is required by 36 CFR 223.53(b) to verify that a catastrophe has occurred and that significant resource loss will occur if it is not harvested promptly. Most all catastrophic damage is the result of fire, and that a fire occurred is not hard to verify. The CO ought to be able to verify that the "XYZ Fire" burned on Joe Bloe's land last week without collecting any data.

I do not support the statement that substantial deterioration can be avoided if the timber is harvested within 1 year. Time is of the essence in salvage. After a catastrophic event private landowners and purchasers try to begin salvaging as soon as the smoke clears. The most important consideration is "urgent removal" and to recover as much value as possible to pay for rehabilitation.

I do not care about the accuracy of the agency's estimate of the paperwork burden of collecting information. It is all a waste of time.

Eliminate all data collection and use a little common sense. The "XYZ Fire" burned Joe Bloe's timberland. Some of your people named the fire and helped fight it. Joe would like to postpone the harvest of the NFS "ABC Green Sale" to allow him to salvage the dead trees.

As you can read from Bruce's response he is very critical of any FS process used to make decisions. Normally Franklin logging does not purchase salvage sales so it is not a priority to provide meaningful comments. My guess in summing up Bruce's comments is to take the purchasers word for what they are claiming and get out of their way so they can log.

I have processed urgent removal requests from purchaser's and it is difficult to convince the FS on exactly if what is claimed is accurate information. At the outset of a request there are many assumptions that are made by the requesting party and it may be difficult to document beyond a reasonable doubt the actual affect logging private salvage may have on the purchaser. In many cases it is the reputation of the purchaser that has a bearing on whether or not I would support the request from the purchaser. It is relatively easy to provide information that appears to meet the criteria of 36CFR223.53 and is difficult to verify...."My two cents whatever its worth".

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