**The 2013 Supporting Statement for OMB 0596-0010**

Forest Industries Data Collection System

**Terms of Clearance:** There are no terms of clearance for the current OMB approval.

**NOTE:** Due to proposed changes to this Information Collection, with this submission the name of the collection associated with OMB control number 0596-0010 is being changed from *Forest Industries, and Residential Fuelwood, and Post Data Collection Systems* to *Forest Industries Data Collection System.*

**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.

*Statues and Regulations:* Resources Planning Act (RPA) of 1974 (PL 93-278), National Forest Management Act Of 1976 (16 U.S.C. 1600), and the Forest and Rangeland Renewable Resources Research Act of 1978 (PL 95-307, STAT. 353) amended by the Energy Security Act of 1980 (42 U.S.C. 8701).

The Resources Planning Act (RPA) of 1974 and the Forest and Rangeland Renewable Resources Research Act of 1978 amended by the Energy Security Act of 1980 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. The Act requires the Secretary of Agriculture 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 Act also calls for:

*“resource management research activities related to managing forests and rangelands for energy production” and for “resource utilization research activities related to harvesting, transporting processing, marketing, distributing, and utilizing wood from forest and rangeland renewable resources; [and utilization research activities related to] producing and conserving energy…”*

The current consumptive and non-consumptive timber use levels from public and private lands are a necessary factor in this assessment. These research activities aid the Forest Service in preparation of future state and nationwide renewable resource assessments and programs. The data collected is currently not available nationwide from other sources.

1. 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.
2. **What information will be collected - reported or recorded? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)**

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

Respondents answer questions regarding:

* The type of logs or wood chips products that have been harvested,
* The volume or weight of logs or wood chips that have been received by the mill,
* The geographic locations (States and/or counties) 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 (optional, only for Western State mills, and
* The volume of byproducts that have been produced because of the manufacturing process, such as bark, sawdust, and slabs.

1. **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.**

Using the *Primary Mill Questionnaire* industrial roundwood information is collected from the primary wood-using industries throughout the United States and from mills in Canada that directly receive wood from the United States.

Data is collected from all known 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 products such as lumber, paper, and biomass energy. Since all known primary wood-using mills are canvassed, the industrial roundwood data collection will not require statistical sampling. (Note: The ‘Primary Mill Questionnaire’ will be updated to reflect the collection of State, year, and species information.)

All known pulpwood\* processors in the United States and Canada that process wood material from the United States, are canvassed annually. All other known primary wood products industries (other than pulpwood processors) are canvassed every 2-5 years, depending on the State.

\* Southern States – pulpwood includes pulp mills. Northern States – pulpwood includes pulp mills and composite wood panel producers.

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

The data collected provides essential information to analyze current supply and drain on the Nation’s timber resources for use as industrial wood products and is used to identify current and potential timber supply problems and opportunities. This enables the development and modification of both public and private forest management programs and investments. In more detail:

* The annual canvas of the pulpwood processors provides a barometer of timber industry activity as well as information specific to current pulpwood demand.
* The canvass of all other known wood products industries, when combined with the annual canvas of the pulpwood processors provides a complete set of industrial harvest information of the State, Regional, or National forest products industry, as well its impact on the forest resources.

General uses of the data are to provide 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 private sector consultants.

1. **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?**

The information is collected by the U. S. Forest Service, Forest Inventory and Analysis [FIA] Program, agents of the FIA Program, or cooperating State agencies using regionally standardized questionnaires that ensure uniformity of results and places the minimum burden on the public.

Around 95 percent of all known pulpwood processors in the United States and Canada that process wood from the United States are e-mailed the *Primary Mill Questionnaire*. The e-mailed questionnaires are a MS Excel workbook. If required, follow-up contacts are made by e-mail or phone calls. The remaining known pulpwood processors are sent the questionnaire by U.S. postal service because either they have requested it, or e-mail addresses are not available. The mailed surveys include a self-addressed, stamped envelope to return the survey.

Respondents are not required to submit data only using the supplied questionnaire. Digital and hard copy company worksheets or tables are also acceptable. This data collection is completed with FIA Program personnel or representatives of the FIA Program.

The Northern and Southern Research Stations (Eastern States) rely on State cooperators to collect the information from the other primary wood processors not included in the survey of pulpwood processors. The State cooperators collect the information from the primary wood-using mills using the *Primary Mill Questionnaire*. The method of collection varies by State. Some states conduct personal mill visits, while others rely on mailed or e-mailed survey forms, or phone calls, or a combination of these methods

In the Western States, FIA program representatives use mail and e-mail questionnaires, and phone calls to collect the information from the primary wood products industry.

The Western Region will continue to use the same questionnaires that are currently approved by OMB, referred to as the *Forest Industries Data Collection System – Pulp & Board, General, Bark & Mulch, and Biomass.*

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

See table 1 for the number of industrial roundwood mills that will be canvassed by questionnaire type, Region, and data collection year. The questionnaires will be updated for each survey with the name of the State that is being canvassed along with the year for which . the data is being collected.

The *Primary Mill Questionnaire* is sent annually to all known pulpwood processors in the Eastern United States and Canada that receive pulpwood from the Eastern United States.

In Western States, the *Pulp & Board Forest Industries Data Collection System Questionnaire* is sent at the same time as all other primary wood products facilities in a given state, on a five year cycle.

All other known primary wood products industries not canvassed by the pulpwood processors are canvassed every 2-5 years in the Eastern United States.

Most States in the Southern Region are canvassed every 2 years.

The cycle varies by State in the Northern Region, with a few States on a 2 or 3 year cycle, but with most States on a 5-year cycle.

Table 1 - Number of surveys by survey type, Region, data collection year1, and data collection questionnaire used.

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Survey type**  **and Region** |  | **Data collection year** | | | **Data collection**  **questionnaire** |
| **Total** | **2013** | **2014** | **2015** |
| **Pulp and Composite Wood Panel Producers** | | | | | |
| North (Pulp and Composite wood panel producers | 210 | 70 | 70 | 70 | Primary Mill Questionnaire |
| South (Pulp mills only) | 246 | 82 | 82 | 82 | Primary Mill Questionnaire |
| West (Pulp and Composite wood panel producers | 10 | 0 | 10 | 0 | Forest Industries Data Collection System - Pulp & Board |
| **Total** | 466 | 152 | 162 | 152 |  |
| **Other Primary Wood Products Industries** | | | | | |
| North | 2,786 | 1,027 | 1,360 | 399 | Primary Mill Questionnaire |
| South (Includes Composite wood panel producers | 1,446 | 0 | 1,446 | 0 | Primary Mill Questionnaire |
| West | 1,113 | 475 | 298 | 340 | Forest Industries Data Collection System – General, Bark & Mulch, and Biomass |
| **Total** | 5,345 | 1,502 | 3,104 | 739 |  |

*1 Data collection year is the date that information is collected. The date of the information is for the previous year.*

1. **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, General Technical Reports, 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. Data may be presented in both graphic and tabular form. Each Forest Service Research Station has individual versatility to present and analyze data.

The collected information is shared with state, regional, and national policy makers and program developers. Information will be combined and summarized to avoid disclosure of individual respondent’s consumption or production. Compiled and summarized results are made available over the internet and will be available upon request by contacting Forest Inventory and Analysis (FIA) units at each research station.

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

With this revised submission the ‘*Logs and Other Roundwood Received* Questionnaire’ and the ‘*Pulpwood Received Questionnaire’* have been combined into the *‘Primary Mill Questionnaire’,* and redesigned for national uniformity. The attached *Primary Mill Questionnaire* has been developed in an attempt to create a single national survey form that can be used by all States or Regions.

The different questions previously included on the 3 Regional survey forms were reviewed to determine their importance to national reporting. Those that were determined to be of importance for all 3 Regions have been included on the submitted *Primary Mill Questionnaire.* For example, only the Western Region asked pulp and composite panel mills how much biomass the mill bought and/or burned for heat and/or power generation (called hog fuel on their questionnaire). People are looking for answers on this important and relevant matter, therefore questions related to the burning of biomass for heat and power generation will be asked nationwide. Questions that improved the information that is reported were also included. In addition, the separate canvass forms for ‘Pulpwood’ and ‘Logs and Other Roundwood Received’ that are currently approved by OMB are combined into the single *Primary Mill Questionnaire.* Information collected from the prior 2 questionnaires is similar, and some additional information would not be collected if included on one of the questionnaires, but not the other. For example, the ‘Pulpwood’ canvass included the amount of whole-tree chips that were used by the pulp industry. Industrial fuelwood and mulch producers can also utilize whole-tree chips, but since they are included in the ‘Logs and Other Roundwood Received’ canvass, whole-tree chip amounts are not broken out. See question 8 for consultations with the respondents of this canvass, and users of the information collected.

For this ICR, only the Northern and Southern Regions will be using the *Primary Mill Questionnaire.* The Western Region will be collecting additional information that is important for reporting on Western States. In addition, the Western Region mill information is being collected by contract with the University of Montana, Bureau of Business and Economic Research, which does not currently have access to Forest Service internal databases and processing. Therefore, for this ICR, the Western Region will continue to use the same questionnaires that are currently approved by OMB, referred to as the *Forest Industries Data Collection System – Pulp & Board, General, Bark & Mulch, and Biomass.*

The ‘*Residential Fuelwood and Post Questionnaire’* will not be included in this ICR. Due to State budget constraints, there are no States that plan on conducting a residential fuelwood survey during the period covered by this ICR. Since this questionnaire is the only component of the current approval that utilizes statistical analysis, “The Supporting Statement Part B for OMB 0596-0010 -” is not included in this ICR.

1. **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.**

The Northern and Southern Regions e-mail the *Primary Mill Questionnaire* to all of the pulpwood mills in their Region that have an e-mail address, and don’t request a hard copy of the questionnaire. The e-mail has an attached MS Excel workbook with the instructions and the form for the mill to fill out and e-mail back; or print, fill out, and mail or fax back.

Information is collected by State personnel from sawmills, veneer mills, and other non-pulpwood, primary wood processors. Some states prefer to send personnel to do mill visits, and concerns about the dusty workplace environments have led them to prefer paper forms over bringing laptops. Other States rely on a combination of mailings, phone calls, e-mails, and/or mill visits. The majority of responses are completed on paper forms, but the respondent can ask for the form to be e-mailed and return the form by e-mail.

The Western Region’s surveys are initially sent out by mail. Follow-up is then done by phone calls, personal visits, or e-mail if requested by the participant.

The Timber Products Output (TPO) group of the FIA program is currently working on a national database design, and set of national questionnaire forms. Once the database and questionnaire forms are completed and approved by all Regions, there are plans to create a web based data entry system that will allow respondents to submit survey data. This system will also allow State cooperators and FIA personnel to enter and edit information collected from respondents on paper forms. This is still in the planning stages and will be a couple years until implemented.

1. **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 Planning 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 keep 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. As an example, the States of Maine and Vermont collect some of the same information, but since the information is collected for tax purposes, it cannot be released by State agencies. Some mills respond to our request for information by sending a copy of their tax records that contain the same information that we are requesting.

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.

In the process of developing a National survey form, State personnel were contacted for their review and input. They were also asked if the information that is to be collected is important and if it was available elsewhere. All indicated that it was important, and most indicated that it was not available elsewhere, especially nation-wide. A couple States collect similar information for State tax purposes, but they are unable to release the information to outside sources.

1. **If the collection of information im­pacts small businesses or other small entities, describe any methods used to mini­mize burden.**

The majority of the primary wood-using mills contacted in this canvass may be considered small businesses. According to the U.S. Census Bureau, more than 70 percent of the establishments in the NAICS code 321 - Wood product manufacturing category employed fewer than 20 people in 2010 (U.S. Census Bureau. 2010. Detailed statistics – American FactFinder <http://factfinder2.census.gov/faces/nav/jsf/pages/index.xhtml>

The forms are designed to minimize the burden to businesses and entities of all sizes by:

1. Combining questions from different canvasses and surveys into 1 canvass that can address different concerns. For example, many states produce forest products directories which list mill contact information, products produced, and equipment lists. By including these questions on the *Primary Mill Questionnaire,* the state can get the information that is needed for a forest products directory without having to send the mill another questionnaire.
2. For mills that have responded to this canvass in the past, parts of the *Primary Mill Questionnaire* can be pre-populated with previous information that is not likely to have changed since the last canvass of the mill. Many of the state cooperators that collect the information for this canvass attach address labels to the questionnaire. These address labels include the mill name, contact person/owner, address, county, latitude and longitude (if available). This requires that the mill only need to review this information for accuracy, and make corrections if needed.
3. For mills that receive the *Primary Mill Questionnaire* by mail, a cover letter is included that indicates that an extra copy of the form is included for the mill to keep for their records. For mills that receive the *Primary Mill Questionnaire* by e-mail, they are reminded to save a copy for their records.
4. Mills can provide other forms, spreadsheets, documentation, or other internal or external reports that they maintain or provide that contains the same information requested in the *Primary Mill Questionnaire.* Some mills maintain an internal database of what species the mill processes, and where they are harvested. Instead of filling out this section in the *Primary Mill Questionnaire*, the mill may instead submit a computer printout or an electronic file of this information from their database.
5. As the size of the mill decreases, the types of timber products produced, the number of species processed, and the procurement radius the mill pulls wood from, all tend to decrease. This often results in less information being required.
6. Some States rely on personal mill visits to collect the information. These data collectors are able to assist mill owners or managers in completing the questionnaires.
7. For mailed questionnaires, self-addressed and stamped return envelopes are provided.
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.**

If this collection is not conducted, it would not be possible for Forest Service to comply with the Forest Management Act of 1976 (FMA), which 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 for the periodic national assessments required by the FMA, this means:

* 1. Updating a current comprehensive inventory and analysis of timber resource use.
  2. Applying scientific knowledge gained from peer review journal articles and publications, literature searches, and correspondence with forest products industry personnel and researchers to support the inventory and analysis.
  3. Providing related information for the development of the periodic assessments.

If the data were collected less frequently, Federal and State agencies, legislators, industrial firms and associations, colleges and universities, Congressional staffers, and researchers would not have the insight into national and regional trends in timber resource use and industry development needed to influence the policy decisions of the legislature and executive branches of both Federal and State governments. The trends in forest harvest would be spread out over a larger period of time, resulting in renewable resource decisions being based on older or out of date information.

1. **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.**

Confidential information is protected under: 7 U.S.C. § 2276: US Code - Section 2276: Confidentiality of information

There are no special circumstances. The collection of information is conducted in a manner consistent with the guidelines in 5 CFR 1320.6.

1. **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, July 6, 2012, in Volume 77, on pages 39985-39986. 1 public comment was received.

The respondent was opposed to this OMB renewal submission because she felt it was only for the use of the lumber industry and there is too much logging occurring. The lumber companies should pay for this and not the tax payers.

FS responded to this public comment, explaining that the Forest Services’ Forest Inventory and Analysis program has been in existence for many years, measuring the forest land of the Nation, not only National Forests. This canvass of the primary wood-using mills was used as a way to report on the harvesting from all forests and all owners, and its impact on the forest resource. The respondent was also informed of some reports that would offer more information about the Forest Inventory & Analysis program.

The respondent responded to the FS response with “MY COMMENT STANDS. THANK YOU FOR YOUR REPLY.”

**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 survey for was sent out to 6 State cooperators that use the information from this data collection. They were asked to evaluate the form to determine: 1) if the information that is collected is useful; 2) if the information is available somewhere else; 3) if the data collection cycle (2-5 years) is appropriate; 4) is the survey form and instructions easy to follow.

1. They all indicated that the information is important, and that, nation-wide, the information collected is not available elsewhere. Several States do collect some of the same information for tax purposes, but it is not available for outside use.
2. Most said that the current collection cycle is adequate, but one review whose State is currently on a 5-year cycle would like to see a shorter cycle.
3. Comments/edits were made to the survey form correcting any spelling/grammatical errors found, and changes were made to improve readability or flow of questions.
4. Some comments were received about the amount of information included on the form that is not necessary for all States. For example, not all States have veneer or composite panel mills. Some items will be edited/modified on the form for a particular State’s needs, such as the species that are listed can be adjusted to reflect the species that are found in a State. But all mill types will be included for all States, otherwise a separate form would need to be submitted for each State for OMB approval.
5. There is a concern from States that have used the short version of the canvas form currently approved by OMB, that mills may be intimidated by the larger number of questions. Address labels or pre-populated forms with available information should help reduce the burden to the mills.

The 6 cooperators contacted to review the form were:

Vern Everson, Forest Resource Analyst, WI Department of Natural Resources

Jeff Settle, Forest Resources Information, IN Department of Natural Resources

Thomas Treiman, Natural Resource Economist, MO Department of Conservation

Steve Vongroven, U&M Program Coordinator, MN Department of Natural Resources

Brian Hendricks, FIA Coordinator, AL Forestry Commission

Byron E. Rominger, Forest Inventory Coordinator, South Carolina Forestry Commission

Note: The Forest Service has taken these remarks into consideration for this collection renewal.

**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.**

Three previous respondents to the canvas (primary wood-using mills) were asked to evaluate the form to determine: 1) if the information is being collected by others; 2) is the survey form and instructions easy to follow; 3) How long it took to complete the form. All indicated that the information that is collected is important and useful, and that it is not available anywhere else on a nation-wide basis. Mills that had to fill out similar information for tax or certification purposes were able to provide the information more readily. In previous years, the mills have been able to supply the information that is turned in for tax or certification purposes instead of filling out the form. This practice should continue.

In general, it took pulpwood mills 1-2 hours to complete the form. The time it took for sawmills to complete the form depended on a number of factors. The smaller sawmills generally took about 30 minutes to complete the form, while larger saw mills took 1-2 hours. One of the largest sawmills that was canvassed in 2009 reported that it took 3.5 hours. A little over half of the sawmills that will be canvassed fit into the small sawmill category (less than 1 million board feet of production a year), and another quarter of the sawmills would fit into the medium sawmill category (1-5 million board feet of production a year). Another factor in the amount of time it took to complete the form was the frequency of previous canvasses. Those mills that were in States that are canvassed every 2 years, in general took less time to complete the form then mills that are canvassed every 5 years.

Based on comments received from the mills surveyed, questions and instructions were re-worded for better clarification, and miss-spelling and other errors on the form were corrected.

The representatives of those from whom information is to be obtained or those who must compile records contacted to review the form were:

Steve Kariainen, Resource Manager, Louisiana Pacific Corporation, Hayward, WI

Richard L. Bohnen, Mid-South Region Analyst, Georgia Pacific LLC

Bob Behr, Wood Procurement Forester, UPM-Blandin, Grand Rapids, MN

Note: The Forest Service has taken these remarks into consideration for this collection renewal.

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

For the primary wood industry questionnaires, participation is voluntary. No financial incentive (payment or gift) will be used to garner responses.

1. **Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Confidential information is protected under: 7 U.S.C. § 2276: US Code - Section 2276: Confidentiality of information. A statement on the instruction sheet informs the respondent that: “All reported volumes are confidential and will be used only for aggregated statistical reports. No individual mill production data will be released. With your permission, other survey information may be used to develop state or regional “industry directories”. Also, the front page of the *Primary Mill Questionnaire* states:

**“ALL VOLUMES REPORTED WILL BE HELD CONFIDENTIAL AND WILL ONLY BE USED TO AGGREGATE TO THE COUNTY AND STATE LEVEL.”** This statement is also on the Instruction Page.

and

“\_\_ Check box to omit the above information from "Regional/Statewide Industry" Directories .“

The ‘above information’ refers to the mill’s contact information found on Page 1. The Instruction Page instructs respondents “Check box to "omit the above information from 'Regional/Statewide Industry" directories' if you DO NOT want mill name and contact information included in industry directories.”

1. **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.

1. **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.**

The burden is calculated at 1.5 hours for pulpwood millsand 0.83 hours (50 minutes) for other primary wood processorsto complete. Column C is the total number of respondents which is a 3-year average of respondents.

These estimates were developed from the comments from the 3 primary wood processors and former respondents, and 6 primary users of the information collected, detailed in Question 8. The wide variation in time required in completing the form due to differences in the type of industry, and the type, volume, and species of the timber product used, was also used to determine the hour burden of this collection. For example, around half of the mills that will be canvassed fall in the category of small sawmill (less than 1 million board feet of production a year). In general, these sawmills reported that it took about 30 minutes to complete the form.

**• 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.**

Table 2 - Number of respondents by survey type and estimate of burden hours.

| **(a)**  **Description of the Collection Activity** | **(b)**  **Form Number** | **(c)**  **Number of Respondents (average per year)** | **(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 mills** | N/A | 155 | 1 | 155 | 90 minutes (1.5 hour) | 232.5 |
| **Other primary wood products industries** | N/A | 1,782 | 1 | 1,782 | 50 minutes (0.83 hour) | 1,485 |
| Totals | - - | 1,937 | - - | 1,937 | - - | 1,717.5 |

**Record keeping burden:**

This data collection does not require that records be kept. The respondent is informed on the front page “If records are not available, please give your best estimates.” Detailed records that may be kept for other purposes, such as tax records or forest products certification, may make it easier for the respondent to complete the form. In many cases, these records may also be submitted in place of completing parts of the canvass form.

**Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories.**

Table 3 – Estimated annual burden hours and cost to respondents by survey type.

| **(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 mills**  (NAICS code 322) | 232.5 | $24.25a | $5,638 |
| **Other primary wood products industries**  (NAICS code 321) | 1,485 | $17.29b | $25,676 |
| Totals | 1,717.5 | --- | $31,314 |

a NAICS code 322 – Paper and paper products: Average hourly earnings - $24.25.

b NAICS code 321 – Wood Products Industry: Average hourly earnings - $17.29.

Estimated average income per hour is from “Table B-3b. Average hourly and weekly earnings of all employees on private nonfarm payrolls by industry sector, not seasonally adjusted” for NAICS codes 321 and 322 for April 2012 from the U.S. Department of Labor, Bureau of Labor Statistics website at <http://www.bls.gov/opub/ee/2012/ces/ces_new.htm>

1. **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.**

There are no capital, startup, or operation/maintenance costs.

1. **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.**

|  |  |
| --- | --- |
| Planning | 54,448 |
| Printing Forms (includes changes to forms) | 1,000 |
| Correspondence/Postage/Mailing, | 930 |
| Canvass/Follow-up (In kind by states)1 | 217,147 |
| Editing, coding, tabulating, analysis, writing | 381,259 |
| Printing/publishing | 49,986 |
| Dissemination/Mailing | 1,200 |
| Training and Miscellaneous | 34,293 |
| Contract with The University of Montana-Missoula, Bureau of Business and Economic Research2 | 283,000 |
| Total | $1,023,263 |

1 *For the Northern and Southern Regions, the states collect the information. Time and expense that states incur in the data collection can be applied to the state’s costs associated with buying down the Forest Inventory and Analysis annual cycle from 10 years down to 5 years.*

2 *The contract with the University of Montana-Missoula, Bureau of Business and Economic Research Program includes that costs associated with planning, printing forms, correspondence/postage/mailing, canvass/follow-up, editing, coding, tabulating, analysis, writing, training, and miscellaneous for the Western States.*

1. **Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-I.**

The overall annual burden hours will decrease from 1,947 hours to 1,717.5 hours for this OMB renewal submission. The decrease in the annual burden hours is based on;

1) the decrease in the number of mills that are operating;

2) the Southern States will only be canvassing the non-pulpwood mills in their region once during this ICR, while they were canvassed twice during the current OMB approval; and

3) Due to State budget constraints, no States plan to conduct a residential fuelwood survey during the period covered by this ICR. Therefore, the ‘*Residential Fuelwood and Post Questionnaire’* will not be included in this renewal submission.

The costs to respondents will increase from $29,756 to $31,314 for this OMB renewal submission. The increase in costs to respondents is the result of:

1) the increase in hourly wages used to calculate the cost to respondents, and

2) due to addition of questions related to the burning of biomass for power and heat for pulp and composite panel mills in the Northern and Southern Regions, the estimated annual burden hours and costs for pulpwood mills to complete the canvass form has slightly increased. (The annual burden hours and cost to respondents for the other primary wood products industries both decreased.)

1. **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 from the USDA, Forest Service, Forest Inventory and Analysis program, such as forestland area and species composition, and industrial output information from other sources.

The results of this information collection will be published as Forest Service Research Notes, General Technical Reports, 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 conditions.

Compiled and summarized results may be available over the internet and will be provided by contacting each research 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.

1. **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.

1. **Explain each exception to the certification statement identified in item 19, "Certification Requirement for Paperwork Reduction Act."**

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