

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

Terms of Clearance

The January 15, 2009, Notice of Action contained no terms of clearance.

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.**

Laws, Statutes, and Regulations

- 16 U.S.C. 477
- 16 U.S.C. 492
- 16 U.S.C. 551
- 16 U.S.C. 607 and 607a
- 36 CFR 223.1, 223.2, 223.5-223.11
- 36 CFR 261.6

Individuals and businesses wishing to remove forest products from national forest lands must request a permit. 16 U.S.C. 551 requires the promulgation of regulations to regulate forest use and prevent destruction of the forests.

Regulations at 36 CFR 223.1 and 223.2 govern the sale of forest products such as Christmas trees, pinecones, moss, and mushrooms. Regulations at 36 CFR 223.5 - 223.11 set forth conditions under which free use of forest products may be obtained by individuals or organizations. 16 U.S.C. 607 provides that a defense against trespass is that the forest products be removed under the regulations. These statutes and the regulations apply to 16 U.S.C. 477, 492, and 607a. Regulations at 36 CFR 261.6 require persons to obtain permits to remove special forest products from National Forest System lands.

Information is required to determine if the applicant meets the criteria under which free use or sale of forest products authorized by the regulations and to ensure that the permittee complies with the regulations and terms of the permit. This information allows Agency compliance personnel to identify permittees in the field.

Based on previous recommendations by the Office of Management and Budget (OMB), the USDA Forest Service (FS) and DOI Bureau of Land Management (BLM) both use the Forest Products Removal Permit and Cash Receipt. Both agencies have assigned this form a number, Forest Service form FS-2400-1 and Bureau of Land Management form BLM-5450-24. This information collection accounts for FS and BLM burden hours for this form.

- 2. Indicate how, by whom, and for what purpose the information is to be**

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

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? (If there are pieces of information that are especially burdensome in the collection, a specific explanation should be provided.)

Table 1 - Information Collected

Form Name and Title	Private Individual or Household	Business	Information Collected			
			Vehicle Information	Identification (Driver's License, Tax ID, or Social Security Number)	Product Requested	Other
FS-2400-1/ BLM-5450-24 Forest Products Removal Permit and Cash Receipt	X	X	X	X	X	Quantity and Date of Harvest
FS-2400-4 Forest Products Contract and Cash Receipt	X	X	X	X	X	
FS-2400-8 Forest Products Free Use Permit	X		X	X	X	
Christmas Tree Application, Tonto National Forest	X	X	X	X	X	Choice of Cutting Area

FS-2400-1 (BLM-5450-24) and FS-2400-8:

The Forest Service or Bureau of Land Management employee issuing the permit collects the information. The requester provides the information orally and the Federal employee enters the information manually on a paper copy of a permit or into an electronic form for processing/printing. The employee issuing the permit discusses terms and conditions with the permittee prior to any harvesting of forest products.

The public has record keeping responsibility for about half of the permits issued. This record keeping requires the permittee to complete blocks on the form that list the quantity of the forest products harvested and date of harvest. This record keeping enables Forest Service compliance personnel to ensure that the forest products harvested are paid for. The small permits that are for only one or two loads of firewood, a few Christmas trees, a few bushels of pine cones, or other small quantities of forest products will not require record keeping. This is approximately half of the permits issued in a fiscal year.

The **Forest Products Removal Permit and Cash Receipt** (FS-2400-1/BLM-5450-24) records sales of special forest products such as firewood, Christmas trees, mushrooms, or pinecones. The value of these permits average less than \$30. There are no refunds for this permit. Note: The Tonto National Forest has developed a specialized form for Christmas tree requests (included as part of this package).

The **Free-Use Permit** (FS-2400-8) allows individuals to gather small amounts of forest products free of charge. Designated Forest Service

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

employees grant individuals free use of forest products up to \$200 in value per fiscal year.

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

FS-2400-4:

The **Forest Products Contract and Cash Receipt** is used for premeasured sales of convertible timber products (products that can be measured in board feet or cubic feet units of solid wood, such as, but not limited to, sawlogs, posts and poles, houselogs, and telephone poles) or for sales of non-convertible forest products (products that do not have a standard conversion to board feet or cubic feet units of solid wood, such as, but not limited to, mushrooms, Christmas tree boughs, pinecones, mosses, and floral greens).

On the **Forest Products Contract and Cash Receipt**, in addition to name and contact information, the tax identification or social security number is required to enable the Forest Service to refund cash payments to the contractor. Refunds under the FS-2400-4 contract occur in the event the contractor does not harvest all forest products, if inclement weather or other causes beyond the control of the contractor prevents the harvesting of forest products. Sales of forest products recorded on these contract forms average \$2,000 each.

FS Record Retention Requirements

All retention periods begin after the case file is closed.

Forest Products Removal Permit and Cash Receipt (FS-2400-1/BLM-5450-24) and Free-Use Permit (FS-2400-8):

Per FSH 6209.11, 41-Part 04, the record retention requirement is three years, for the FS-2400-1, and FS-2400-8 permits. (Case files containing correspondence and records pertaining to the preparation and administration of individual permits for the sale of timber, firewood, Christmas trees, or other forest products.)

Forest Products Contract and Cash Receipt (FS-2400-4):

Per FSH 6209.11, 41-Part 04, the record retention requirement is six years for the FS-2400-4 contract (unless issued by the Washington Office in which case the record retention requirement is ten years). (Timber Sale Contracts - Case files, financial analyses files containing correspondence and records pertaining to the sale, award, and administration of individual timber sales.)

- 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.**

Individuals/Households and businesses wishing to remove forest products from National Forest System and Bureau of Land Management lands provide the information.

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

The collected information is required to determine if the applicant meets the criteria for free-use or sale of forest products as authorized by regulations,

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

and to ensure that the permittee complies with regulations and permit terms. This information allows Forest Service and Bureau of Land Management compliance personnel to identify permittees in the field. Identification information (driver's license, tax number, or Social Security number) allows Agency employees to verify names and addresses.

The Forest Service and Bureau of Land Management use the name, address, and identification number to record the individuals and businesses obtaining forest products. This information is necessary to ensure that individuals and businesses have not received product values in excess of the amount allowed by regulation in any one fiscal year. Individuals receive up to \$200 value of free use in a fiscal year from a Forest Officer, or \$5,000 in a fiscal year from a Forest Supervisor. Individuals and businesses may purchase up to \$10,000 worth of forest products noncompetitively in a fiscal year.

Law enforcement and other personnel conducting field compliance checks, use the name, address, and unique ID number to identify permittees during forest product collection. Since the permit is nontransferable, this compliance check ensures that the person harvesting a forest product has a permit. Permits are for a described area and permittees may only harvest forest products in that area.

The **FS-2400-1/BLM-5450-24**, Forest Products Removal Permit, sells special forest products such as firewood, Christmas trees, mushrooms, or pinecones at rates established by the Forest Service. The permits are limited to \$1,000 in value.

National forests in Arizona use the Tonto National Forest Christmas Tree Application, as there are more requests for Christmas Trees in these forests than there are trees available. The application and selection process provide equal opportunity for all applicants to obtain a tree.

The **FS-2400-8**, Forest Products Free Use Permit, allows free use of forest products in accordance with regulations in 36 CFR 223.5 - 223.11. Free use permits are generally limited to \$200 in value.

The **FS-2400-4**, Forest Products Contract records sales of timber or forest products at rates established by the Forest Service (or at competitive bid rates). These contracts are limited to \$10,000 in appraised or advertised value. Under certain circumstances, information from bidders competing for a forest products contract is collected on form *FS-2400-42a National Forest Timber and Forest Products for Sale (Advertisement and Short-Form Bid)*, which is covered by information collection 0596-0066. In such instances, the contracting officer uses the information from form FS-2400-42a to complete the Forest Products Contract (FS-2400-4) prior to award. (More specifically, form FS-2400-42a, is used for soliciting and receiving bids on short-notice advertised timber sales made using contract form FS-2400-4, except when soliciting bids by published advertisement; when soliciting bids by posting notice in public places or by distributing notices to potentially interested parties and the contract form FS-2400-4 does not adequately state the conditions that the bidder must meet; or when soliciting bids for timber sale

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

set-aside sales. Since the FS-2400-42a is a bid form, it is covered under information collection 0596-0066 with the other bid forms the FS uses.)

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?

A Forest Service or Bureau of Land Management (BLM-5450-24) employee working at a unit office collects the information. In such circumstances, the person requesting the permit provides the information orally and the Federal employee either enters the information into a computer for processing and printing, or enters the information manually on a paper copy of a permit.

Applicants submitting the Tonto National Forest Christmas Tree Application do so either over the Internet or manually. A drawing determines who will receive a permit. Forest employees use the information provided to complete a FS-2400-1 for each applicant selected. Issuance of the permit occurs upon receipt of payment.

The Forest Service is currently developing a process to collect the required information electronically (via the Internet) for permits FS-2400-1, FS-2400-4, and FS-2400-8. The burden estimates in Table 2 include the burden for face-to-face and electronic payments via the Internet. The electronic payment form is not yet available, though when available and approved by OMB, approximately half of the respondents may want to purchase permits electronically via the internet with a credit card.

e. How frequently will the information be collected?

On average, respondents file 1.5 responses per year, based on estimates that half of all respondents submit two requests per year.

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

The information may be shared with Forest Service and Bureau of Land Management Law Enforcement Officials, as needed and for official use only, for compliance and enforcement purposes of the following rules and regulations:

- 16 U.S.C. 551 requires the promulgation of regulations to regulate forest use and prevent destruction of the forests;
- Regulations at 36 CFR 223.1 and 223.2 govern the sale of forest products such as Christmas trees, pine cones, moss, and mushrooms;
- Regulations at 36 CFR 223.5 - 223.11 set forth conditions under which free use of forest products may be obtained by individuals or organizations;
- 16 U.S.C. 607 provides that a defense against trespass is that the forest products be removed under the regulations. These statutes and the regulations apply to 16 U.S.C. 477, 492, and 607a; and

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

- Regulations at 36 CFR 261.6 require persons to obtain permits to remove special forest products from National Forest land.

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

Collection requirements remain unchanged. However, in FY 2007-08, the Forest Service started to determine the best way to collect the information using the Internet, but that effort has been put on hold until at least FY 2013 and has been identified as a medium work priority for implementation during FY 2013 or FY 2014, due to agency financial system changes and other higher priority projects/efforts.

3. 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.

Respondents provide the information verbally to a Federal employee. Forest Service personnel enter the information from the Forest Service forms into the computerized Timber Information Manager (TIM) system. The information is stored electronically in the TIM system and can be retrieved and entered automatically by the Forest Service into subsequent permits or contracts obtained by the applicant.

At this time, the only approved web-based process for applying for permits electronically is the Tonto National Forest Christmas Tree Application. During FY 2007-2008, the Forest Service started working on a database application for all Agency permits. However, the effort has been put on hold until at least FY 2013, due to agency financial system changes and other higher priority projects/efforts. Furthermore, because the web-based permitting effort has been identified as a medium-level work priority its actual implementation may not occur until FY 2014. Once the Forest Service determines a web-based process is ready for field-testing, a justification for a non-substantial change request will be submitted to OMB.

4. 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.

The information is not available elsewhere via other forms or for related purposes. The opportunity does not exist to use only one form. The forms are used under different circumstances for different purposes. They implement different regulations and contain different conditions or provisions for compliance.

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

The Forest Service and Bureau of Land Management collect the minimum

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

information necessary to comply with Federal laws and regulations. The Forest Service's use of the Timber Information Manager (TIM) system further minimizes the burden on respondents, since an applicant's name, address, and identification number are stored as a computerized record and retrieved when the same individuals or small businesses purchase permits or contracts in the future. In fact, use of the TIM system allows respondent contact information to pre-populate the forms, decreasing the response time for repeat respondents.

The Forest Service's efforts to develop a national web-based application and permit process will further reduce the burden on respondents. It will allow applicants/permittees to complete necessary forms from a location of their choice via the Internet, negating the need to complete the permit process in person, thus saving time and money.

6. 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.

Without a forest products removal program, accomplishing multiple use management programs such as reducing fire hazards and improving forest health on National Forest System and Bureau of Land Management lands would be impaired. Many individuals and small businesses depend on forest products for their livelihood. In addition, many individuals living in rural areas use fuelwood from Federal lands for heating and/or cooking. Without these forest products programs, an increase in thefts of firewood, Christmas trees, and other products would likely occur.

7. 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;**

The permittee or purchaser may be required to complete the document's "Product Quantity Removal Record", located on the first page of each form above the "Signatures" block, as described immediately below.

The FS-2400-1 (BLM 5450-24) and FS-24008 permit forms both contain General Condition (#15), requiring: "Permittee shall complete the Product Quantity Removal Record in ink prior to transporting products..."

Regarding the FS-2400-4 Forest Products Contract, should *Other Condition WO-2* be included as part of the contract, then the purchaser would be required to complete the following: "Product Quantity Removal Record must be completed each day in ink by the Purchaser before leaving the sale area. Date entry must be completed before harvesting begins and amount must be completed before leaving the sale area."

- **Requiring respondents to submit more than an original and two**

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

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.**

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

- 8. 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.**

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.

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.

The notice and request for public comment was published on Tuesday, August 16, 2011, in Federal Register Volume 76, Number 158, Pages 50715-50716, and titled "Department of Agriculture, Forest Service, Information Collection; Forest Products Removal Permits and Contracts" (copy attached). The public was

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

instructed that comments must be received in writing on or before October 17, 2011 to be assured of consideration.

Comments Received in Response to Federal Register Notice

No comments were received

Comments from Other Federal Agencies

Bureau of Land Management (BLM), James Bowmer: Mr. Bowmer was asked if the estimate of approximately 5,000 5450-24 permits issued was still current. Mr. Bowmer responded "Although it varies year to year I would say that number is still accurate."

Bureau of Land Management, McKinley-Ben Miller: "I just had our Sale Reporting guru run the numbers through, and the system came up with a grand total of 8,809 5450-24's issued in FY 10."

[Note: The BLM's information) is included in computation of burden hours, item A -12 of this supporting statement.]

Comments from Individuals Contacted

The following individuals were contacted to ascertain if the requested information collection (name, address, and identification number) and the burden estimate for providing the information were reasonable.

Mr. Curt Hawkins, 410 N 200 E, Kanab, UT 84741

Phone: 435-644-2730 (home); 435-644-2430 (work).

Mr. Hawkins stated:

- The amount of time he spent providing the required information and obtaining a forest products permit was acceptable,
- The information requested to obtain a forest products permit was reasonable,
- It was fairly clear why the specific information was requested, when obtaining a forest products permit, and
- It was a fair and reasonable process.

Mr. Paul Chapman, 821 W. Rider, Kanab, UT 84741

Phone: 435-644-2026

Mr. Chapman stated:

- The amount of time he spent providing the required information and obtaining a forest products permit was acceptable,
- The information requested to obtain a forest products permit was fine,

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

and

- The specific information requested was clear and the process was simple.

Mr. Don Bacco, P.O. Box 473, Kanab, UT 84741

Phone: 435-644-3693

Mr. Bacco stated:

- The amount of time he spent providing the required information and obtaining a forest products permit was acceptable,
- The information requested to obtain a forest products permit was a bit excessive because he was asked to provide identification (but then he changed his mind and said it was acceptable),
- He felt the specific information requested when obtaining a permit was not very clear, and
- Overall, he said the permit process itself was fine.

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

There are no plans to provide any payments or gifts to respondents.

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

The forms FS-2400-1/BLM-5450-24, FS-2400-8, and FS-2400-4 do not contain any assurance that the information submitted is kept confidential. The collected information is retained and stored according to applicable Agency regulations; for the Forest Service such regulations can be found in Forest Service Handbook 6209.11, record series 2400.

All requests for collected information are processed pursuant to the Privacy Act and the Freedom of Information Act. The USDA Privacy Act System of Records USDA/OCFO-3 (Administrative Billings and Collections) covers the collection, maintenance, and use of information collected from private citizens on forms FS-2400-1 and FS-2400-4. The DOI Privacy Act System of Records DOI/LLM-16 (Mineral and Vegetable Material Sales), covers the collection, maintenance, and use of information collected from private citizens on form BLM-5450-24.

11. 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.

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

- 12. 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.**
 - 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)**

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

Table 2- Estimated Burden Hours - Reporting

(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) ⁷	(f) Estimate of Burden Hours per Response ²	(h) Total Annual Burden Hours (e x f)
Private Sector - Business						
BLM Forest Products Removal Permit and Cash Receipt ¹	BLM-5450-24	666		1,000		83
Forest Service Forest Products Removal Permit and Cash Receipt (Includes Tonto National Forest Christmas Tree Application) ¹	FS-2400-1 ³	18,000	1.5	27,000	5 minutes (.083 hour)	2,324 ⁴
Forest Products Contract and Cash Receipt ²	FS-2400-4 ³	360		540		45 ⁵
<i>Subtotal: Private Sector - Business</i>		<i>19,027</i>	<i>---</i>	<i>28,540</i>	<i>---</i>	<i>2,452</i>
Individuals or Households						
BLM Forest Products Removal Permit and Cash Receipt ¹	BLM-5450-24	6,000		9,000		747
Forest Service Forest Products Removal Permit and Cash Receipt (Includes Tonto National Forest Christmas Tree Application) ¹	FS-2400-1 ³	162,000	1.5	243,000	5 minutes (.083 hour)	20,169 ⁴
Forest Products Contract and Cash Receipt ²	FS-2400-4 ³	40		60		5 ⁵
Free Use Permit	FS-2400-8 ³	20,000		30,000		2,490 ⁶
<i>Subtotal: Individuals or Households</i>		<i>188,040</i>	<i>---</i>	<i>282,060</i>	<i>---</i>	<i>23,411</i>
Totals	---	207,067	---	310,600	---	25,863

¹ Forms BLM-5450-24, FS-2400-1: Estimates are that 10 percent of these forms are issued to businesses and 90 percent of these forms are issued to individuals or households.

² Form FS-2400-4: Estimates are that 10 percent of these forms are issued to businesses and 90 percent of these forms are issued to individuals or households.

³ Forms FS-2400-1 and FS-2400-8: Forest Service employees are working to determine how best to collect the same information electronically via the Internet, with the goal to accomplish this at some point in the near future. Thus, the burden estimate for each form includes either face-to-face purchasing or electronic payment via the Internet. The electronic payment form is not yet available. When available, approximately half of the respondents may want to purchase their permit electronically and with a credit card, rather than face-to-face.

⁴ FS-2400-1: Estimates are that the Forest Service annually issues one-third of total Forest Product Removal Permits to individuals and businesses for the

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

first time, and approximately two-thirds of these permits to individuals and businesses who previously received a permit. Use of the Timber Information Manager (TIM) database allows respondent contact information to pre-populate the form, decreasing the response time for repeat respondents. The estimated response time is an average of the new and repeat user response times.

- ⁵ Yearly, the Forest Service issues approximately 50 percent of the Forest Products Contracts to small businesses for the first time; and approximately 50 percent to small businesses who previously received a contract. Use of the TIM database allows respondent contact information to pre-populate the form, decreasing the response time for repeat respondents. The estimated response time is an average of the new and repeat user response times.
- ⁶ Yearly, the Forest Service issues approximately 20 percent of new Free Use Permits to individuals for the first time, and approximately 80 percent to individuals who previously received a permit. Use of the TIM database allows the respondent's contact information to pre-populate the form, decreasing the total response time for repeat respondents. The estimated response time is an average of the new and repeat user response times.

⁷ Rounded to the nearest whole number.

- **Record keeping burden should be addressed separately and should include columns for:**
 - a) **Description of record keeping activity:**
 - b) **Number of record keepers:**
 - c) **Annual hours per record keeper:**
 - d) **Total annual record keeping hours (columns b x c):**

Table 3: Estimated Record Keeping Burden

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Record Keepers ³	(f) Estimate of Burden Hours per Record Keeper ²	(h) Total Annual Burden Hours (c x f)
Private Sector - Business				
BLM Forest Products Removal Permit and Cash Receipt ¹	BLM-5450-24	333	4 minutes (0.067 hour)	22.3
Forest Service Forest Products Removal Permit and Cash Receipt ¹	FS-2400-1	900		60.3
Forest Products Contract and Cash Receipt ²	FS-2400-4	180		12.1
<i>Subtotal: Private Sector - Business</i>		<i>1,413</i>	---	<i>94.7</i>
Individuals or Households				
BLM Forest Products Removal Permit and Cash Receipt ¹	BLM-5450-24	3,000	4 minutes (0.067 hour)	201
Forest Service Forest Products Removal Permit and Cash	FS-2400-1	8,100		542.7

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Record Keepers ³	(f) Estimate of Burden Hours per Record Keeper ²	(h) Total Annual Burden Hours (c x f)
Receipt ¹				
Forest Products Contract and Cash Receipt ²	FS-2400-4	20		1.3
Free Use Permit	FS-2400-8	10,000		670
<i>Subtotal: Individuals or Households</i>		<i>21,120</i>		<i>1,415</i>
Totals	---	22,533		1,509.7

¹ Forms BLM-5450-24, FS-2400-1: Estimates are that 10 percent of these forms are issued to businesses and 90 percent of these forms are issued to individuals or households.

² Form FS-2400-4: Estimates are that 10 percent of these forms are issued to businesses and 90 percent of these forms are issued to individuals or households.

Approximately half of all permits and contracts issued have record keeping requirements. Estimates are that it takes (on average) four minutes to record and submit the required information.

The Tonto National Forest Christmas Tree Application has no recording keeping requirements.

³ Rounded to the nearest whole number.

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

Table 4: Estimated Cost to Respondents

(a) Description of the Collection Activity	Total Collection Burden Hours		Total Record Keeping Burden Hours		Estimated Total Annual Burden on Respondents (Hours)	Estimated Average Income per Hour*	Estimated Cost to Respondents
	Business	Individuals	Business	Individuals			
BLM-5450-24	83	747	22.3	201	1,053.3	\$17.40	\$ 18,327
FS-2400-1/Tonto NF Christmas Tree Permit	2,324	20,169	60.3	542.7	23,096	\$17.40	\$ 401,870
FS-2400-4	45	5	12.1	1.3	63.4	\$24.41	\$ 1,548
FS-2400-8	-----	2,490	-----	670	3,160	\$17.40	\$ 54,984
Totals	2,452	23,411	94.7	1,415	27,372.7	-----	\$ 476,729

*Based on average weekly salary from Department of Labor, Bureau of Labor Statistics for May 2010, http://www.bls.gov/oes/current/naics4_113300.htm

Applicants for FS-2400-8 and FS-2400-1 permits are usually individuals in rural

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

areas seeking small quantities of forest products for personal use. Estimated Average Income per Hour based on “All logging NAICS 113300=Logging SOC Code 00-0000 All Occupations \$17.40/hour mean hourly salary.”

Most of the bidders for FS-2400-4 contracts are small businesses seeking larger quantities of forest products or timber for use in the forest products industry. Estimated Average Income per Hour based on “All logging NAICS 113300-Logging SOC Code 43-1011 First Line Supervisors/Managers \$ 24.41 mean hourly salary” (<http://www.bls.gov/oes/current/oes431011.htm>).

- 13. 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 operation and maintenance costs.

- 14. 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**

Table 5: Annualized Cost to the Government

FORM	ESTIMATED NUMBER OF HOURS	ESTIMATED COST/HOUR	TOTAL COST
FS-2400-8	4,999	\$32.83	\$ 164,117.17
FS-2400-1, Tonto National Forest Christmas Tree Application, and BLM-5450-24	70,000	\$32.83	\$2,298,100

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

FS-2400-4	63	\$46.10	\$ 2,904.30
Print Forms	---	---	\$ 15,663.33
Computer O&M	---	---	\$ 176,988.02
Total	75,062	---	\$2,657,772.82

The estimated number of hours is based on the average time it takes for a Federal employee to complete a permit form and explain conditions to the permittee, and for a Contracting Officer to complete a contract form and explain conditions to the purchaser. The estimated cost/hour includes salary, benefits, supervision, and overhead costs such as rent and utilities.

Permit Cost/Hour: The Forest Officer issuing a permit is estimated to be a GS-7/5 who earns approximately \$22.92, and benefits totaling about \$3.67 (16 percent). The additional \$6.24 per hour costs include supervision from a GS-9 or GS-11 and overhead costs such as rent, utilities, and computer system costs. $\$22.92 + \$3.67 + 6.24 = \$32.83$.

Contract Cost/Hour: The Contracting Officer issuing a contract is estimated to be a GS-11/5 who earns approximately \$33.92 per hour, plus benefits totaling about \$5.43 (16%). The additional \$6.75 per hour costs include overhead costs such as rent, utilities, and computer system costs. $\$33.92 + \$ 5.43 + \$6.75 = \$46.10$

Hourly wage taken from Office of Personnel Management Pay Tables, found at <http://www.opm.gov/oca/11tables/indexGS.asp> and http://www.opm.gov/oca/11tables/pdf/dcb_h.pdf

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

- There is an estimated burden increase of 8,978 hours since the last submission, and an estimated increase of 108,397 in the annual number of responses.
- In 2008, this information collection received approval for 18,395 burden hours, based on 224,736 responses.
- This information collection renewal requests approval for 27,373 burden hours, based on an estimated 333,133 responses.

Changes in number of responses and burden hours based on improved tracking via the Timber Information Manager (TIM) application; as well as revision of estimated time needed for reporting and record keeping.

Table 6: Total Number of Contracts Issued, by Type, During Fiscal Years 2009-2011¹.

(a) Description of the Collection Activity	(b) Form Number	(c) Number of Respondents ¹		
		FY2009	FY2010	FY2011
BLM Forest Products Removal Permit and Cash Receipt	BLM-5450-24	7,877	8,804	8,623
Forest Service Forest Products Removal Permit and Cash	FS-2400-1	258,94	264,982	262,736

Supporting Statement for OMB 0596-0085
FOREST PRODUCTS REMOVAL PERMITS AND CONTRACTS
NOVEMBER 2011

Receipt (Includes Tonto National Forest Christmas Tree Application)		0		
Forest Service Free Use Permit	FS-2400-8	23,319	25,466	20,091
Forest Service Forest Products Contract and Cash Receipt	FS-2400-4	474	432	404
Total¹	---	290,610	299,684	291,854

¹ Table 6 shows the total number of forms issued to all parties including Private Sector-Business, Individuals and Households; some parties may have been issued multiple forms.

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

There are no plans to publish the name, address, and identification number information requested for collection.

17. 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 agency has been granted, under a prior submission to *not* display the expiration date for OMB approval. The agency is, thus, requesting to continue not displaying the expiration date for OMB approval. This date conflicts with the expiration date shown on the permit/contract, creating confusion for those issued a permit or purchasing under a contract. In general, the public thinks that the expiration date for OMB approval is the date the permit or contract terminates, when this is not the case. This results in law enforcement issues that have to be dealt with by the appropriate Forest Officer and/or Contracting Officer, as well as Forest Service Law Enforcement Officers. The public could be cited and fined or other appropriate law enforcement action taken, if operating under an expired permit or contract.

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

There are no exceptions to report.

B. Collections of Information Employing Statistical Methods

This information collection does not use statistical methods.