

The 2016 Supporting Statement for OMB 0596-0010

Forest Industries and Logging Operations Data Collection Systems

Note: The supporting statement includes revisions to 05696-0010 Forest Industry census, and Residential Fuelwood and Post Data Collection. The '*Residential Fuelwood and Post Questionnaire*' will not be included in this OMB renewal submission. The logging Operations survey will be added.

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.**

Statutes 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

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resource assessments and programs. The data collected is currently not available nationwide from other sources.

2. 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.

The information is collected by the 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.

Mill Survey: The data collected provides essential information to analyze current supply and drain on Nation's timber resources for use as industrial wood products as required by the Resources Planning Act (RPA) of 1974 (PL 93-278) and the Renewable Resources Research Act of 1978 (PL 95-307). Specifically, the information is used to identify current and potential timber supply problems and opportunities. This enables the development 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 canvassing every 2-5 years, depending on the State, 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.

This information collection and analysis performed on the data is used by state foresters and the U.S. Forest Service in the development of state forest resource plans. General uses of the data are 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.

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.

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Data may be presented in both graphic and tabular form. Each Forest Service Research Station has individual versatility to present and analyze data.

Summarized 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.

The added questionnaire to loggers will assist identifying and characterizing the logging capacity available in the area. These data will provide information to better understand the logging industry's response to outside influences such as changes in wood markets.

Loggers Survey: Information pertaining to the logging company (home county/city, crew members, and number of crews) will be tracked to determine changes in the logging contractor workforce as a whole, not by individual company. As mills close and forest land uses change, jobs and businesses may be lost. On the other hand, investments in new heavy equipment or increases in the number of crews are usually positive signs for the logging industry and workforce. This type of data is important in understanding the logging industry and its response to outside influences. The crew and production information (loads per day, certification status, miles willing to travel and procurement method) are used in the site selection analysis and can show areas of excess worker capacity. When this information is combined with the U. S. Forest Service, Forest Inventory and Analysis (FIA) forest stand data, we gain a better understanding of opportunities for the logging industry.

Results 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. The information will be shared with the Southern Research Station Forest Operations Research to Achieve Sustainable Management Unit.

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.

Mill Survey: The Southern Region e-mails the *questionnaire* to all pulpwood mills that have an e-mail address, and have not requested a hard copy of the questionnaire. The e-mail includes an MS Excel workbook attachment containing instructions and questions for the mill to fill out and e-mail back; or print, fill out, and mail or fax back.

For non-pulpwood mill processors, only a small percentage are sent questionnaires attached in e-mails, and return the questionnaires by e-mail. The majority of these responses are completed on paper forms. Some states prefer to send personnel to

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do mill visits, and concerns about the dusty workplace environments have led them to prefer paper forms over bringing laptops.

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.

Loggers Survey: Information will be collected by face to face interviews with responses logged into an electronic data recorder by the FIA representative carrying the interview. This minimizes the burden to respondents and reduces costs by eliminating printing, mailing and phone contacts. Respondents are contacted only once with no follow-up or reminders needed.

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.

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 that is included in this OMB renewal submission. 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.

5. If the collection of information impacts small businesses or other small

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entities Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

Mill Survey: The majority of the primary wood-using mills contacted in this canvass may be considered small businesses. According to the U.S. Census Bureau, close to 70 percent of the establishments in NAICS code 321 - Wood product manufacturing category employed fewer than 20 people in 2014 (U.S. Census Bureau. 2014. County Business Patterns. http://factfinder.census.gov/faces/nav/jsf/pages/download_center.xhtml#. Accessed September 13, 2016). The forms are designed to minimize the burden to businesses and entities of all sizes by:

- 1) Providing a set of forms tailored to the mill size and product type ensures that smaller mills are not overwhelmed by a cluttered form that likely requests information not applicable given the size or type of operation. 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.
- 2) By requesting information useful to the states when generating state mill directories (such as mill contact information, products produced, and equipment lists) help reduce the amount of surveys a mill could receive
- 3) Many of the state cooperators collecting 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). Including these labels reduces the burden on respondents by requiring only review for accuracy and edits as necessary.
- 4) Mills can provide other forms, spreadsheets, documentation, or other internal or external reports they maintain and that contain the same information requested in the questionnaires. Some mills maintain internal databases of the tree species the mill processes, and from where trees are harvested. Instead of filling out this section in the respective questionnaire, the mill may instead submit a computer printout or an electronic file of this information from their database.
- 5) 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.
- 6) For mailed questionnaires, self-addressed and stamped return envelopes are provided.
- 7) To aid respondents in selecting their applicable wood procurement areas, states may add an appendix page to the mill survey showing a map of the state with counties name and number, and/or provide a list of state county names.

Loggers Survey: According to the U.S. Census Bureau, 94% of establishments in NAICS code 1133 - Logging category, employed fewer than 20 people in 2014 (U.S. Census Bureau. 2014. Business Patterns. http://factfinder.census.gov/faces/nav/jsf/pages/download_center.xhtml#. Accessed September 13, 2016). The survey is designed to minimize the burden to businesses and entities of all sizes by presenting the questions in person and requiring no respondent's effort to access, complete, or mail forms. All answers

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are recorded in data recorder by interviewer, reducing the time and cost burden to respondents.

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.

If this collection is not conducted, it would not be possible for Forest Service to comply with the Forest Management Act of 1976 (RPA), 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 RPA, this means:

- a. Updating a current comprehensive inventory and analysis of timber resource use.
- b. Applying scientific knowledge to support the inventory and analysis.
- c. 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.

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;**

Mill Survey: Not required. Pulpwood mills are canvassed once a year and the other wood product mills are canvassed every 2-5 years.

Loggers Survey: Information collected, at most, annually from a sample of all active logging operations.

- **Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Mill Survey: Not required. Respondents are given at least 30 days to respond, and usually more than 30 days.

Loggers Survey: Responses are collected at time of visit. Only verbal responses.

- **Requiring respondents to submit more than an original and two copies of any document;**

Mill Survey: Not required. Respondents are required to submit only one form

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per mill.

Loggers Survey: Not applicable. No written form to complete by respondent.

- **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records for more than three years;**

Mill Survey: Not required. Respondents are not required to maintain additional records. The canvass only asks for the prior year amount of wood that came into the mill.

Loggers Survey: Information does not involve past information. No record keeping needed.

- **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;**

Mill Survey: Not required. All active mills are surveyed (not a sample of mills).

Loggers Survey: Sample is based on stratified geographical location and represents a valid estimate to generalize to the population, given type of wood products harvested.

- **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

Mill Survey: Not required. Based on entire population of active primary mills.

Loggers Survey: No data classification involved

- **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**

Not required. Forest Inventory and Analysis, of which this canvass is a part, confidential information is protected under: 7 U.S.C. § 2276 : US Code - Section 2276: Confidentiality of information. Respondents are not required to supply information. Instructions on front page of the canvass read:

“...This canvass is voluntary. While you are not required to respond your cooperation is needed to make the results of the canvass comprehensive, accurate, and timely. ALL VOLUMES REPORTED WILL BE HELD CONFIDENTIAL AND WILL ONLY BE USED TO AGGREGATE TO THE COUNTY AND STATE LEVEL.”

- **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.**

Mill Survey: 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.

Loggers Survey: No proprietary information involved.

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- 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.**

The Federal Register 60-day Notice for the renewal of this information collection was published on July 7, 2016, in Volume 81, on pages 49924-49925. 2 public comments were received (see attached document of e-mail record: Public Comments OMB 0596-010.docx)

Summary of public comment:

Public Comment 1

Ms. Jean Public sent comments opposing this data collection expressing discontent at the idea of collecting information from industry and not the general public as to what happens to natural resources. In the response, Ms. Public was informed that the survey of primary wood-using mills was used as a way to report on harvesting across all forest land ownerships and that results are used to evaluate impact on the forest resource.

Ms. Public responded with further comments expressing the need to protect sites from logging and the export of logs to China. The response indicated the significance of this Information Collection effort, which aim is to determine how forest resources are used across the Nation. It was also pointed out that the majority of the timber output in the U.S. originates from private lands.

Jean Public's following response expressed her wish for all logging on public lands to stop. Seeing that Ms. Public's comments concerned FS National Forest Management rather than the current Collection Information, she was provided with the FS Forest Management website so that she can address her concerns to the appropriate forum.

Public Comment 2

The National Council for Air and Stream Improvement (NCASI) provided comments through an e-mail message from Dr. Stephen Prisley. NCASI provided comments in support of this Information Collection and suggestions to improve the TPO mill surveys by moving to a sample based survey using a mill size stratification method. In the response to this suggestion it was communicated that efforts by the National TPO program to evaluate different sampling methods are currently underway. The hope is to minimize burden by contacting a fraction of mills rather than attempting a survey of all active mills. The dynamic nature of the industry in both temporal and spatial dimensions can complicate practicability, however.

Another suggestion provided by NCASI was the availability of a web-based form and methods to allow multi-firm companies to provide one central response. In our response we took the opportunity to inform NCASI of TPO's future plans to

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develop an on-line survey form which, when ready, would need to undergo an OMB approval process including a public comment period. We also provided information to clarify that multi-firm companies are allowed and encouraged to submit from a single point of contact. In effect a few large companies opt to submit information for all mills at a single time.

Public Comment 3

The American Loggers Council (ALC) provided comments through an e-mail message with attached letter from Mr. Daniel J. Dructor. In the comments, Mr. Dructor conveyed ALC's issues with the proposed loggers' survey. Specific issues posed by ALC include the relevance of some question when trying to evaluate the logging industry's capacity and strength. For instance, ALC finds the question about loads per day inappropriate to gauge capacity when information pertaining to load limits, such as quotas, are not taken into account. The question on procurement method was also identified as irrelevant in the measurement of the industry's health or capacity. Lastly, ALC's suggests reevaluating the questions and revising or dropping the survey.

Response to Mr. Dructor's and ALC comments and concerns is being developed and will be issued as soon as all the needed program information is received.

Communications received from two other individuals involved requests for additional information on the nature of the loggers' survey and did not include comments or suggestions to this Information Collection.

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 regions have consulted with representatives via e-mail and telephone conversations to discuss timeliness and frequency of data reports as well as the length and depth of the resulting industry reports. A few of the consulted users include

Steven A. Brink
California Forestry Association
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steveb@calforests.org

Brandon R. Kaetzel, PhD
Principal Economist
Resources Planning Program
Oregon Department of Forestry
brandon.kaetzel@oregon.gov

Patrick Rappold, Ph.D.
Wood Utilization & Marketing Specialist

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Arizona State Forestry
patrickrappold@azsf.gov

Dorian Smith
Economic Analyst
Office of Budget and Economics
Washington Department of Natural Resources
Dorian.smith@dnr.wa.gov

The program has also consulted with state partners to evaluate the TPO forms used in terms of information usefulness, adequacy of frequency, and difficulty.

David Neumann, CF
Forest Products Utilization & Marketing Specialist
Michigan Department of Natural Resources
neumannd@michigan.gov

Andrew Stoltman
Forest Inventory Specialist
Wisconsin Department of Natural Resources
Andrew.Stoltman@wisconsin.gov

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.

State representatives who collect the information where consulted to get feedback directly related to the survey forms and the frequency of data collection. Comments received have resulted in current efforts to develop alternative sampling methods that could reduce the burden while maintaining the quality and relevance in time and depth of information currently provided with the full canvass approach. Aside from direct communication with individual state partners and industry representatives, FIA carries out annual user group meetings to provide opportunities for program staff to interact with the user community.

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

Participation in the mill survey and the loggers' survey is voluntary. No financial incentive (payment or gift) will be used to garner responses.

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

The Freedom of Information Act (5 U.S.C. 552) governs the confidentiality to be provided for information received by the Forest Service. This information collection

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is not covered by a Privacy Act System of Records. 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 questionnaires state:

"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."

- 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, such as those pertaining to sexual behavior, attitudes, religious beliefs, or other matters commonly considered private.

- 12. Provide estimates of the hour burden of the collection of information. The statement should:**

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultations with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden and explain the reasons for the variance.**

This renewal submission has a total of 2,170 respondents, with 2,170 responses for a total of 1,131 burden hours.

- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

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Table 1a. Mill Survey estimated hour burden by region and form.

Form covered	Number of Respondents (average per year)	Number of responses annually per Respondent	Estimated Hour Burden	Total Annual Hour Burden
Primary Wood Using Mill	444	1	0.83	368.5
Primary Wood Using Mill-Pulpmills	139	1	0.50	69.5
National Timber Products Output Roundwood Received for Processing	702	1	0.50	350.8
Roundwood Received for Processing	168	1	0.83	140.3
Roundwood Received for Processing, Composite-Fuel	44	1	0.83	36.7
FIDACS-Pulp and Board, Biomass and Other Mills; FIDACS-General; FIDACS-Out of State	75	1	0.83	62.3
FIDACS-Short	38	1	0.37	13.9
FIDACS-Post cards	125	1	0.08	10.0
Total	1,735	--	--	1,051.3

Table 1b. Loggers Survey estimated hour burden by region.

Region	Form length Questions	Number of Respondents (average per year)	Number of responses annually per Respondent	Estimated Hour Burden	Total Annual Hour Burden
South & West	10 questions	260	1	0.25	65.0
North	2 questions	175	1	0.08	15.0
Total		435	--	--	80.0

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

Table 2a. Annualized costs for mill survey respondents.

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Description of the Collection Activity	Estimated Total Annual Burden on Respondents (Hours)	Estimated Average Income per Hour ⁽¹⁾	Estimated Cost to Respondents
Pulpwood mills	69.5	\$26.06	\$1,811
Other primary wood products industries	981.8	\$18.71	\$18,369
Totals	1,051.3	---	\$20,180

⁽¹⁾ Estimated average income per hour is from series id CES3132100003 "Average hourly earnings of all employees, wood products, seasonally adjusted" for NAICS code 321 and series id CES3232200003 "Average hourly earnings of all employees, paper and paper products, seasonally adjusted" for NAICS code 322 for 2014 from the U.S. Department of Labor, Bureau of Labor Statistics website at <http://data.bls.gov/pdq/SurveyOutputServlet>. Accessed September 13, 2016.

Table 2b. Annualized costs for Loggers survey respondents.

Description of the Collection Activity	Estimated Total Annual Burden on Respondents (Hours)	Estimated Average Income per Hour ⁽²⁾	Estimated Cost to Respondents
Loggers Survey	80	\$8.80	\$704

⁽²⁾ Estimated average income per hour is from series id CES1011330013 "Average hourly earnings of all employees, logging, seasonally adjusted" for NAICS code 1133 for 2015 from the U.S. Department of Labor, Bureau of Labor Statistics website at <http://www.bls.gov/data/#employment>. Accessed September 13, 2016.

- 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.**

The information collection and the data questions are such that no capital or startup costs are incurred. Respondents, other than the time burden, require no special equipment, extra personnel assistance, or incur any additional costs.

- 14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include qualification of hours, operational expenses (such as equipment, overhead, printing, and support staff) and any other expense that would not have been incurred without this collection of information. Agencies may also aggregate costs estimates for Items 12, 13, and 14 in a single table.**

Activity

Mill Survey Costs

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Planning	26,475
Printing Forms (includes changes to forms)	300
Correspondence/Postage/Mailing,	450
Canvass/Follow-up (In kind by states) ¹	221,825
Editing, coding, tabulating, analysis, writing	184,090
Printing/publishing	4,900
Dissemination/Mailing	400
Training and Miscellaneous	32,300
Contract with The University of Montana- Missoula, Bureau of Business and Economic Research ²	380,997
Total	<u>\$851,737</u>

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.

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, analyzing, writing, training, and miscellaneous for the Western States.

Implementing the Loggers survey will costs approximately \$2,110 per year. Cost of implementing this survey will be low, as all planning, travel, training, costs of processing program and data edits, etc. are costs already incurred as part of the harvest utilization studies. Adding the survey collection to this existing program only creates minor added time for survey delivery.

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

Changes and adjustments to the annual burden hours and costs to respondents:

The overall annual burden hours will decrease 587 hours from 1,718 hours for the current OMB approval to 1,131 hours for this OMB renewal submission. The decrease in the annual burden hours is based on the decrease in the number of mills that are operating, plus all regions revised the standard form (non-pulpmill mills) creating a shorter version aimed at smaller mills. The Southern region is now collecting information for pulpmills Nation-wide and plans to use a revised form tailored to pulpmills, which requires less time to complete as reported by responding mills. Additionally, the Southern region will collect data for mills (other than pulp mills) only during one of the three years covered by this renewal (a survey in 2018 to collect 2017 mill information).

The costs to respondents will decrease from \$31,314 estimated for the current OMB approval to \$20,884 for this OMB renewal submission. The decrease in costs to respondents is the result of the lower estimated annual burden hours for pulpwood mills and other mills to complete the revised canvass forms.

Lower costs to government are based on various factors including: Development of new processing system which incorporates various data edits and aggregation schemes saving processor and analysts' time. Publication costs have declined considerably as electronic publications become more popular. Additionally half of the staff in the Southern region retired and have been replaced by employees at

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mid-level salary, lowering the fixed costs associated with Analysis, planning, reporting, etc.

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

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

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

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

18. 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.