

**From:** Brandeis, Consuelo -FS

**Sent:** Tuesday, October 11, 2016 8:26 AM

**To:** 'Daniel Dructor' <americanlogger@aol.com>

**Subject:** RE: Comments on Fell Tree Study - Logging Company Information

Dear Mr. Dructor

Thank you so much for your comments on the Federal Register notice for OMB process 0596-0010 – Information Collection; Forest Industries and Logging Operations Data Collection Systems. Please accept my apologies for the slow response. We appreciate the American Loggers Council's input to help improve this collection effort and the opportunity provided to further explain the proposed loggers' survey.

The USDA Forest Service, Forest Inventory and Analysis (FIA) program collects information on tree harvest utilization to assess the volume of harvested wood left on site (logging residues). Information from harvest utilization studies combined with periodic timber products output (TPO) mill surveys complement FIA's reporting of volume removed for forestland for the Nation.

As you indicate, information collected by the proposed loggers' survey is minimal and might not on its own be sufficient to determine logger capacity or industry's health. However, the effort represents one source and type of information that combined with other aspects of the program will help evaluate the health of the industry. For instance, information such as loads per day and miles willing to travel will be used in site selection analysis which, when combined with FIA forest stand data can provide better understanding of opportunities for the logging industry. The proposed survey will be carried out face to face during FIA harvest utilization visits. Therefore, it contains few questions to avoid major interruption at the worksite.

Information collected will also be used to support research by the Forest Operations Research Unit (<http://www.srs.fs.usda.gov/forestops/>). This research unit has studied harvesting equipment and production rates for over 40 years. As equipment and technology evolves, researchers in this unit performed field tests to examine production rates, logging efficiencies, ergonomic impacts on workers, and environmental impacts of application techniques. Researchers can use the data collected in this survey, in conjunction with other available data, to determine such things as how long business owners keep their equipment. A machine rate isn't a perfect tool, but it is commonly used by university and governmental researchers to compare equipment and harvesting systems. Responses to question 10 provide information that will be useful in updating the machine life variable used in the machine rate calculation.

Harvest utilization sites are selected from a stratified population to allocate sample points to all significant primary products including saw logs, veneer logs, pulpwood, composite panels, poles and pilings, posts, firewood, and other miscellaneous products as applicable. Stratification is accomplished using information from a state's most current primary mill survey, which provides tree species group and product type breakdown. As such, site selection is market oriented therefore we expect the survey will represent current markets for all roundwood products.

While landowner certification might not always be known to the logger, the question is included to help capture this information when not found from other sources. In other words, this is an optional question to be asked only when/if the FIA crew is not able to obtain the information from other sources. A note will be added as a reminder to the FIA interviewer. Likewise, a note

will be added to specify that the logger certification question refers to current State logging training certification. We agree that the logger education training courses do not measure on-the-ground performance. Many of these certification courses address logging business finance, a review of best management practices, and safety. Participation in such courses and certification programs can also be an indicator of the investment that logging businesses make in their workforce.

Although loads per day is not an optimal measure, in the survey setting this variable represents an obtainable indicator to proxy for other measures of capacity that are otherwise difficult to obtain (the survey will be conducted at logging sites where information on business performance is unlikely to be available). Loads per day is an easy measure used in many cases as a target to manage operations. We agree that the number of loads per day can be dictated by markets, quotas, harvest type and even stand characteristics. We will explore updating the question to aid in removing the market and stand bias so that responses can include both the current loads per day and the loads produced per day in an unconstrained market, or include the loads per day and an additional question to indicate if restricted by quota or not.

Although profitability is not directly affected by wood procurement method, knowing the procurement method utilized by the logger gives insight as to level of available capital (if purchasing wood from landowner directly) and level of business integration. Examining regional trends can help identify capacity. Equipment age is a variable generally used by the forest industry as a health indicator as it represents the ability of the logging industry to invest, also indicating logger's confidence in the industry's future. The logging cost index developed by the Wood Supply Research Institute includes equipment investment as a prediction variable in their log cost indices. Equipment age fairly readily available can serve as proxy for equipment investment.

I hope the above responses provide enough information to justify the inclusion of these questions on the logger's questionnaire and to confirm the significance of the information to gaining a better understanding of the industry dynamics. If you need further information or have additional questions, please let me know.

Sincerely,

Consuelo Brandeis



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