

Supporting Statement A for OMB 0596-0225

Timber Sale Contract Operations and Administration

Please Note: In the context of this supporting statement the terms Purchaser and Contractor may be used interchangeably to describe an individual, private sector business, or government entity that has been awarded and currently holds one or more contracts for the sale and disposal of National Forest System timber or other forest products.

Abstract (5 CFR 1320)

Forest Service contracts for the sale of timber and other forest products are bilateral contracts in which both contracting parties are bound to fulfill obligations reciprocally. By their nature bilateral contracts require both parties to routinely share information and enter into agreements pertaining to operations and performance. Some information collected under Forest Service contracts is required by laws, regulations and/or timber sale policies. Each contract specifies the information the contractor will be required to provide, including the timing and frequency of the information collection.

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:

- The National Forest Management Act (16 U.S.C. §472a),
- Healthy Forest Restoration Act (16 U.S.C. §6591c),
- Contract Disputes Act of 1978 (41 U.S.C. 601, et seq.),
- Executive Order 11246, as amended by EO 11375 and EO 12086,
- 36 CFR 223.30-223.53,
- 36 CFR 223.110-223.118,
- Forest Resources Conservation and Shortage Relief Act of 1990, section 620d Monitoring and Enforcement, as amended in 1997 by Public Law 105-83 and current through Public Law 110-450, approved December 12, 2008,
- 2 CFR 180 - OMB Guidelines to Agencies on Government-wide Debarment and Suspension (Non-procurement),
- 2 CFR 417 - Non-procurement Debarment and Suspension, supplements 2 CFR 180 as the (USDA) policies and procedures for non-procurement debarment and suspension specific to USDA and the Forest Service,

- 40 CFR 112,
- Agricultural Act of 2014, Title VIII Forestry.

The information collection in this request is necessary to implement the above statutes, regulations, and policies designed to administer contracts for the sale and disposal of National Forest System timber and other forest products.

Forest Service contracts for the sale and disposal of National Forest System timber and other forest products are bilateral contracts in which both contracting parties must fulfill obligations reciprocally. By their nature, bilateral contracts require both parties to routinely share information and enter into agreements pertaining to performance. Recognizing the importance of documented communication between both parties, the contracts include a clause titled Notices that states: Notices by either party as to action taken or to be taken by the other respecting this contract shall be made in writing to the other party's designated representative.

Information collected pursuant to contract administration is required by laws, regulations, and Forest Service timber sale policies. Each contract specifies the information the contractor will be required to provide, including the timing and frequency of the information collection. Additionally, these contracts are subject to the Contract Disputes Act of 1976. Written documentation of plans, inspections, requests for action by the other party, agreements, modifications, acceptances of work, and virtually everything else pertaining to performance is collected and is essential to resolving disputes.

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.

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.)

The terms of each contract and external factors such as market conditions, weather, and court orders dictate what information must be collected and when it will be collected. These are being referred to as potential information collections because the actual collection of information varies between contracts for reasons described in this supporting statement. The list of potential information collections includes everything from simply obtaining a signature on a contract inspection form prepared by the Forest Service to a contractor providing a Spill Prevention Control and Countermeasures Plan certified by a registered professional engineer.

The contracts are designed to be flexible and accommodate a wide range of potentially changing conditions and circumstances through notices and mutual agreements. This flexibility relies on the exchange of information and written agreements between the contracting parties. Most of the information collected from the contractors has financial and/or contract performance implications. Consequently, the information must be collected in a manner that documents the source and date when the information was provided. The process of

administratively resolving disputes arising under a contract is heavily dependent upon the written record. An incomplete written record can lead to costly litigation.

The type and amount of information collected varies depending on the size, complexity, and length of each contract. Contracts include numerous references to things that must be agreed to after the contracts are awarded. Most agreements must be custom crafted to address a set of conditions that are often unique to a specific place and time. Another agreement might make a minor change to the boundary of an area designated for harvesting due to the discovery of a new nest tree for some sensitive species of wildlife.

b. From whom will the information be collected? If there are different respondent categories (such as a loan applicant versus a bank versus an appraiser), each should be described along with the type of collection activity that applies.

The information is collected from individuals, private sector businesses, government entities, and non-profit organizations that have either:

- Already been awarded a Timber Sale contract
- May be awarded a Timber Sale contract in the future.

c. What will this information be used for? Provide ALL uses.

The information is needed by the agency for a variety of uses associated with contracts for the sale and disposal of National Forest System timber and other forest products including:

- (1) Planning and scheduling contract administration workloads
- (2) Planning and scheduling the delivery of government furnished materials needed by contractors
- (3) Assuring safety of public in vicinity of contract work
- (4) Identifying contractor resources that may be used in emergency firefighting situations
- (5) Determining contractor eligibility for additional contract time
- (6) Monitoring compliance with domestic processing requirements
- (7) Monitoring compliance with Small Business Administration requirements
- (8) Processing agreements and modifications
- (9) Determining fair market value of National Forest System timber
- (10) Providing consent to conduct business electronically

d. How will the information be collected (for example 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 various information collections are obtained in a variety of ways depending on the type of information that is being collected and how it will be used. One thing in common is that virtually all the information collections must be verifiable as to the source and time due to the legally binding nature of the information under the terms of the contract. Examples include:

- 1) Contracts can be modified for a wide variety of reasons. Modifying the terms of a contract generally has financial implications to each party. Contract modifications require the original signatures of both parties and are executed on hard copy forms FS-2400-9 and FS-2400-10.
- 2) To guarantee payment for timber, contractors are required to pay cash in advance of cutting or may furnish a payment bond which assures payment will be made after the timber is cut. Contractors are required to complete form FS-6500-12 when a payment bond is used on a single contract, or form FS-6500-12a when the payment bond will cover two or more contracts. These are hard copy forms that require original signatures of the purchaser and surety.
- 3) The timber sale contracts require contractors to provide plans addressing various aspects of their operations. The information required for individual plans varies depending on the size, length and complexity of each contract and how the contractors choose to submit the required information. Contractors may submit separate plans addressing different contract requirements or include multiple requirements into a single plan. For example, a traffic control plan (B/BT6.33) may be submitted as separate plan or incorporated into an Operating Schedule (B/BT6.31). To assist individuals and small business contractors, many Forest Service regions and contracting officers have developed templates to help contractors in preparing their plans. These templates are optional, and contractors are free to provide the information in a format of their choosing, such as in a letter or using their own company form.
- 4) Timber sale contracts contain remedies including liquidated damages in event the contract must be modified or cancelled as the result of environmental litigation. When environmental litigation is filed after a sale has been advertised but prior to award, the Forest Service generally delays award until the litigation is resolved. For a variety of reasons some contractors request award prior to the litigation being resolved and in exchange agree to forgo liquidated damages. To document these quid pro quo agreements the Forest Service has developed form FS-2400-0076, Pre-Award Waiver, Release, and Limitation of Liability Agreement. This is a hard copy form that requires signature of the purchaser.

- 5) Forest Service will be implementing standard electronic business practices such as electronic signatures as authorized under the Electronic Signatures in Global and National (ESIGN) Commerce Act of 2000. This requires that the contractor or purchaser consent to conducting business electronically which will be provided on the FS-2400-0017 Consent to Conduct Timber Sale or Integrated Resource Timber Contract Business Electronically. Clarification of information provided may occasionally require answering questions face-to-face, over the phone, or by Internet. Information collected for agreements made in the field is generally by verbal communications documented by the Forest Service and then signed by the contractor.

e. How frequently will the information be collected?

There is no schedule for collecting this information. Information is collected on a case-by-case basis depending on the nature of the contract, and a host of variable conditions unique to each contract and the environment in which the work or sale is being conducted.

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

Although the information is generally not shared, some of the information collected is used to monitor compliance with programs and regulations established by the Small Business Administration and the Department of Labor. The information may be shared with those organizations upon request.

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

The following currently approved forms have been revised with non-substantive changes that did not affect the types or amount of information collected:

FS-2400-0009 Agreement Extend and Modify Timber Sale or Integrated Resource Timber Contract: The changes to this form included changing the title to include Integrated Resource Timber Contracts and reformatting the form to comply with new standards for Forest Service Forms.

FS-2400-0010 Agreement Extend and Modify Timber Sale or Integrated Resource Timber Contract: The changes to this form included changing the title to include Integrated Resource Timber Contracts and reformatting the form to comply with new standards for Forest Service Forms.

FS-2400-0012 Third Party Agreement: The form was reformatted to comply with new standards for Forest Service forms and to accommodate the use of a single form for either a timber sale or an integrated resource timber contract. Terminology was changed to clarify which party is the transferor and which party is the transferee.

SF-2400-0016 Request for Cooperative Work: The form was reformatted to comply with new standards for Forest Service forms and to accommodate the

use of a single form for either a timber sale or an integrated resource timber contract.

SF-2400-0076 Pre-Award Waiver, Release, and Limitation of Liability Agreement: The form was reformatted to comply with new standards for Forest Service forms and to accommodate the use of a single form for either a timber sale or an integrated resource timber contract.

SF-2400-0077 General Plan of Operation: The form was reformatted to comply with new standards for Forest Service forms and to accommodate the use of a single form for either a timber sale or an integrated resource timber contract.

SF-2400-0078 Annual Operating Schedule: The form was reformatted to comply with new standards for Forest Service forms and to accommodate the use of a single form for either a timber sale or an integrated resource timber contract.

SF-2400-0079 Specified Road Schedule of Proposed Progress: The form was reformatted to comply with new standards for Forest Service forms and to accommodate the use of a single form for either a timber sale or an integrated resource timber contract. It has also been renamed as shown above.

The following collection has been added with this collection:

FS-2400-0017 Consent to Conduct Timber and Integrate Resource Contract Business Electronically: This form is being added to facilitate electronic business.

The following collections will not be renewed with this collection:

FS-2400-0011 Waiver of Time Limit: This form is used when additional time is needed for a purchaser to complete non-timber removal work after the contract terminates. It has been determined that there are other avenues under the contract that are more appropriate to meet the same need.

R1-FS-2430-6a Timber Sale Inspection Report: Obsolete Region 1 inspection report that is no longer in use.

R5-2400-147 Timber Sale Inspection Report: Obsolete Region 5 inspection report that is no longer in use.

R8-2400-74 Obsolete Region 8 inspection report that is no longer in use.

SF-25 Performance Bond Form: This is a government wide form and is administered under OMB 9000-0001.

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, such as 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.

Information will be collected using a variety of methods including hard copies hand delivered, hard copies sent via USPS, electronic document signing software or commercial delivery service (UPS, Fed-Ex, etc.), facsimile, email, and in some cases verbal communication.

All forms may be completed and stored electronically.

Most permissions and agreements are initiated by a request from the contractor and may be sent electronically via email.

The method of collection depends on the type of information that is being collected and how it will be used. For example, a formal modification of a contract can be signed either with original signatures on hard copies or using electronic document signing software such as Adobe Sign. A contractor has the discretion to submit a request for the release of a payment unit using any written method including email. In an effort to reduce burden, with this submission, several electronic versions of forms have been redesigned to accommodate the use of a single form for differing types of agreements, as described in question 2g above.

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.

Each item of data collected is unique to each contract and therefore not duplicative, with two exceptions:

- Contractors holding multiple contracts can prepare a single Spill Prevention Control and Counter Measures Plan for all of its contracts,
- Prior to initiating operations during the fire precautionary period, contractors may prepare and submit a single Fire Prevention and Control Plan for more than one contract.

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

Contracting Officers and other members of the Forest Service sale administration team routinely help small contractors to understand the terms of their contract and assist them in providing information required by the contract. For example, prior to initiating operations contractors must complete an annual Operating Schedule. Depending on the size and complexity of the contract this could include a Traffic Control Plan, a Fire Prevention and Control Plan, a Route of Haul Map, a material delivery schedule, and a plan of operation for road construction. Forest Service

personnel will often meet with small contractors to review these requirements and help them compile and submit the necessary information.

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.

Forest Service contracts for the sale and disposal of National Forest System timber and other forest products are bilateral contracts in which both contracting parties are bound to fulfill obligations reciprocally towards each other. By their nature bilateral contracts require both parties to routinely share information and enter into agreements pertaining to performance. Each contract specifies the information the contractor will be required to provide, including the timing and frequency of the information collection. Agreements are typically custom crafted to address a unique set of conditions and variables which does not permit standardizing a form for agreements.

Additionally, these contracts are subject to the Contract Disputes Act of 1976 which requires contractors to submit claims in writing to the contracting officer. Written documentation of plans, inspections, requests for actions, agreements, modifications, acceptances of work, and virtually anything else pertaining to performance is essential to administratively resolving disputes. The inability to collect information required under the terms of a contract could result in delays, disputes, claims, litigation and/or defaults.

Without this information the agency would not be able to comply with and to implement the various statutes, regulations, and policies designed to ensure that National Forest System timber is sold in accordance with the law.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

a. Requiring respondents to report information to the agency more often than quarterly.

Most of the information collections do not occur more often than quarterly, but, when operations are in progress on a contract, there is a need for a steady exchange of information between the contractor and the Forest Service. For example, the contract requires the contractor to locate landings, skid trails, and temporary roads for approval by the Forest Service. On most contracts it is not feasible or desirable for the contractor to locate these items for the entire contract area before requesting Forest Service approval. The standard practice is to locate and request approval of landings, skid trails, and temporary roads on a harvest unit by harvest unit basis as operations progress. Depending on the size of the contract, size of individual harvest units, and the contractor's rate of progress this could occur on a monthly, weekly, or even a daily basis. The frequency of the agreements is essentially controlled by the contractor who requests approvals on an as-needed basis. This is also the case for most of the situations where the contract requires the contractor to request certain actions

by the Forest Service or for both parties to reach agreement on certain actions. The frequency of the requests and agreements is dictated by the contractor.

All contracts where the volume for payment purposes is determined after felling (scaled) and all contracts in the contiguous U.S. west of the 100th meridian including those where the volume is determined prior to felling (tree measurement) require the contractor to attach a Forest Service load receipt to each load of logs before it leaves the contract area. Load receipts must be completed by the contractor prior to affixing them to a load. This includes adding the date and time the truck was loaded, the destination where the truck will unload, the name of the truck driver and may include other accountability information required on the regional load receipt. The receipt is then folded in half and attached to the load in a manner where the information entered on the receipt is not readily visible. After the load reaches its destination, the receipt is removed and returned to the Forest Service. The information entered on load receipts by contractors is used exclusively by the Forest Service. The use of load receipts is an essential component in Forest Service timber theft prevention efforts and in the Western United States helps monitor compliance with domestic processing requirements pursuant to the Forest Resources Conservation and Shortage Relief Act of 1990 as amended.

Some small contractors may generate one load of logs every 1-2 weeks while some large contractors are capable of generating 25+ loads of logs per week.

Load receipts are accountable property. Used load receipts are deposited in Forest Service collection boxes or sent back to the Forest Service by the contractor. Unused load receipts are returned to the Forest Service at the end of seasonal operations and at the end of the contract.

b. Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt.

Due to the nature of contracts and agreements, respondents typically provide response in fewer than 30 days. Load receipts must be completed and attached to loads of forest products prior to leaving the loading site.

c. Requiring respondents to submit more than an original and two copies of any document.

This collection of information does not have a requirement for the respondents to submit more than an original document.

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

This collection of information is under United States Department of Agriculture, Forest Service File Code 2400, Title, Retention Period. The collection does not have a mandatory requirement for retaining records or record keeping.

- e. 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.**

This collection of information does not have a connection with a statistical survey.

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

This collection of information does not have a requirement of the use of statistical data classification.

- g. 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.**

This collection of information does not have a pledge of confidentiality.

- h. 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.**

A Federal Register Notice requesting comments was published on Monday, December 9, 2013, on page 73818, Volume 78, Number 236. The agency received no comments.

Table 1. Summary of public comments received, and agency response or action taken related to the comment(s)

Commenter (using Personal Identifier protocols)	Comment	Forest Service response or action related to comment
Public 1	Why does the form ask for the county?	The county is required per 36 CFR 1630(f)
Public 1	I don't understand why question 6 is needed on this form?	Question 6 is used to assist the Forest Service to adjust the program of work.
Public 2	The Forest Service is not managing	This comment is not directed to the

Commenter (using Personal Identifier protocols)	Comment	Forest Service response or action related to comment
	the campground and the toilets are dirty.	collection of information on this form.

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 Forest Service contacted the following representatives to obtain their views as follows:

Long Year LLC

Dylan Malone

No comments received.

Long Year LLC

Spencer Donnelly

No comments received.

West Fraser

Doug Read

No comments received.

West Fraser

John McLellan

No comments received.

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

No payment or gift will be provided to respondents.

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

There are no assurances of confidentiality for the information collected except for business records obtained pursuant to contract provision B/BT6.9. When not in use, the information collected under B/BT6.9 is stored in a locked filing cabinet, with

access limited to only those Federal employees that need access to the information. Official copies of all other information collected are stored in project files for each contract maintained in the open file system.

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.

No questions of a sensitive nature are part of this information collection.

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. If this request for approval covers more than one form, provide separate hour burden estimates for each form.

DESCRIPTION	FORM NO.	NO. OF RESPONDENTS	NO OF RESPONSES PER RESPONDENT	TOTAL ANNUAL RESPONSES	HOURS PER RESPONSE	TOTAL HOURS
Contract Modification	2400-0009	684.00	1.00	684.00	2.00	1,368.00
Contract Modification (Note: 2400-0010 used when corporate surety secures performance bond)	2400-0010	216.00	1.00	216.00	2.00	432.00
Third Party Agreement	2400-0012	10.00	1.00	10.00	2.00	20.00
Timber Purchaser's Request for Work & Cooperative Deposits	2400-0016	151.00	2.00	302.00	1.50	453.00
Limited Liability Agreements	FS-2400-0076	31.00	1.00	31.00	0.50	15.50
General Plan of Operation (optional)	FS-2400-0077	900.00	1.00	900.00	1.40	1,260.00
Annual Operating Schedule (optional)	FS-2400-0078	900.00	2.00	1,800.00	1.30	2,340.00
Specified Road Schedule of Proposed Progress	FS-2400-0079	437.00	1.00	437.00	0.50	218.50
Payment Bond	FS-6500-12	60.00	1.00	60.00	1.00	60.00
Blanket Payment Bond	FS-6500-12a	130.00	1.50	195.00	1.00	195.00
Product Identification - Complete Load Receipt & attach to each load	FS Load Receipt	290.00	350.00	101,500.00	0.20	20,300.00
Consent to Conduct Timber Sale or Integrated Resource Timber Contract Business Electronically	FS-2400-00XX	300.00	1.00	300.00	0.20	60.00
SUBTOTAL PRIVATE SECTOR		4,109.00	363.50	106,435.00	13.60	26,722.00

All estimates are based on data pulled from the Forest Products Financial System (FPFS) in preparation of this submission. The number of sales is constantly changing

as new sales are sold and previous sales are closed so both sets of data represent a snapshot on the date the data was pulled from the FPFS. We predict that the number of sales will increase over the next three-year period and have based the burden estimates for this submission on the last three years of data.

The number of respondents was estimated by a query of the Forest Products Financial System, displaying all open contracts, and then using professional judgment to determine the average number of respondents each year.

The number of responses per respondent was estimated by using professional judgment, considering such things as number of contracts, average number of contracts per respondent, volumes harvested, number of contracts with specified roads, and number of contracts with volume determined by scaling.

The burden per response was estimated with input from respondents and using professional judgment.

Record keeping burden should be addressed separately and should include columns for:

- a) Description of record keeping activity:** None
- b) Number of record keepers:** None
- c) Annual hours per record keeper:** None
- d) Total annual record keeping hours (columns b x c):** Zero

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

DESCRIPTION	FORM NO.	HOURS PER RESPONSE	TOTAL HOURS	COST PER HOUR	TOTAL COST
Contract Modification	2400-0009	2.00	1,368.00	\$43.19	\$59,083.92
Contract Modification (Note: 2400-0010 used when corporate surety secures performance bond)	2400-0010	2.00	432.00	\$43.19	\$18,658.08
Third Party Agreement	2400-0012	2.00	20.00	\$43.19	\$863.80
Timber Purchaser's Request for Work & Cooperative Deposits	2400-0016	1.50	453.00	\$43.19	\$19,565.07
Limited Liability Agreements	FS-2400-0076	0.50	15.50	\$43.19	\$669.45
General Plan of Operation (optional)	FS-2400-0077	1.40	1,260.00	\$43.19	\$54,419.40
Annual Operating Schedule (optional)	FS-2400-0078	1.30	2,340.00	\$43.19	\$101,064.60
Specified Road Schedule of Proposed Progress	FS-2400-0079	0.50	218.50	\$43.19	\$9,437.02

Payment Bond	FS-6500-12	1.00	60.00	\$43.19	\$2,591.40
Blanket Payment Bond	FS-6500-12a	1.00	195.00	\$43.19	\$8,422.05
Product Identification - Complete Load Receipt & attach to each load	FS Load Receipt	0.20	20,300.00	\$43.19	\$876,757.00
Consent to Conduct Timber Sale or Integrated Resource Timber Contract Business Electronically	FS-2400-00XX	0.20	60.00	\$43.19	\$2,591.40
SUBTOTAL PRIVATE SECTOR			26,722.00	\$43.19	\$1,154,123.18

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.

The estimated cost to the Federal government is \$500,065.59.

For the complete break out of the cost estimate please view separate tab labeled Appendix A 0596-0225 Title Burden Hour Cost Spreadsheet.

15. Explain the reasons for any program changes or adjustments reported on the burden worksheet (IC staff paste answer into ROCIS Burden Short Statement Block).

Program changes included in this submission have not changed the burden estimates for this collection.

16. For collections of information whose results are planned to be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates and other actions.

There are no plans to publish the information collected.

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 Forest Service requests permission to exclude the expiration date of the OMB approval because the OMB expiration date has caused confusion with contract, permit, and load receipt effective dates, resulting in unnecessary confusion and litigation.

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

- ☒ On behalf of this USDA Forest Service, I certify that the collection of information encompassed by this request complies with 5 CFR 1320.9 and the related provisions of 5 CFR 1320.8(b)(3).