

Federal Timber Purchasers Committee

1901 Pennsylvania Ave, NW, Ste 1007 Washington DC 20006

October 2, 2022

Mr. Michael VanDyck
Forest Management Service Center
2150A Centre Avenue, Bldg A
Fort Collins, CO 80526

Dear Mr. VanDyck:

Thank you for this opportunity to submit comments on Batch 2B updates to the Timber Management Directives on behalf of the members of the Federal Timber Purchasers Committee.

Overall, the proposed changes are helpful in updating old terminology and references. The proposed changes are especially helpful in regards to cruises that fail to meet sampling errors, Designation by Prescription, Virtual Boundaries, Total Weight Scaling, and Load Count Scaling.

We offer the following comments for your consideration:

FSH 2409.12, Cruising Handbook, Chapter 40

-41.33 Failed to meet Sampling Error

We recommend editing the first sentence as follows:

“If the sale ... the actual sale error must be documented in the sale advertisement.
~~and the sale must be check cruised.~~”

Multiple Forests do not have check cruisers. Our concern is that the potential harm from delaying advertisement to allow time for a check cruise could be greater than the potential benefit of a check cruise for a sale where the actual sampling error is within one percent of the sampling error standard. All things considered, our members don't see the value of a check cruise for a sale with a discrepancy of less than of one percent if that discrepancy is highlighted in the advertisement and prospectus.

-42.41 Electronic Data Recorders

We recommend the following edit to the second sentence:

“Regions must provide ... data entry; local programs are not permitted **unless approved by the authorized officer.**”

FSH 2409.12, Cruising Handbook, Chapter 70

-71.1 Designating Timber in Advance of Sale

Policy for use of Designation by Prescription is included in FSM 2441. Specifically, FSM 2441.2-Designation Without Marking contains the following direction: “Use area designation to reduce sale layout costs when such methods would accomplish the silvicultural objectives. Examples of area designation include clearcutting ... and DxP or DxP.”

The FTPC has been emphasizing the value and importance of implementing DxP since Congressional authorization in the 2014 Farm Bill. However, in numerous meetings with various FTPC members, Forest Service staff continue to describe manpower and funding as limiting factors in getting sales to market, even as their units are not fully utilizing DxP authorities.

We recommend adding the following to 71.1-Designating Timber in Advance of Sale:

3. Marking trees to be cut or to be left with paint shall be only be used when the District Ranger documents in the Cruise Plan that other methods of designation are either less cost effective or will not meet silvicultural objectives.

That sentence is completely consistent with FSM 2441, and we recommend adding it to reinforce the urgency of utilizing DxP authorities as a means of reducing costs and getting more work done on-the-ground.

FSH 2409.15, Timber Sale Administration Handbook, Chapter 20

-21 – B/BT2.0 Timber Specifications

We recommend adding a short descriptive paragraph about the 2400-3 contracts, along the lines of the following, for FS staff and purchasers who are not familiar with those contracts:

“Forms FS-2400-3S (scale) and FS-2400-3T (tree measurement) are used for the sale of timber products that can be measured in cubic feet (convertible) and are shorter versions of contract forms FS-2400-6 and FS-2400-6T. Form FS-2400-3P is used for the sale of forest products that cannot be measured in cubic feet (nonconvertible).”

-21.133 – B/BT2.133 Damaged by Catastrophe

We recommend adding the following to the second paragraph as follows:

“The Contracting Officer shall meet with the Purchaser as soon as possible following the disturbance event to determine if damage criteria are met. If the catastrophic damage criteria are met ... modification for catastrophe.”

-27.22 – Truck Tare Weight Information

The first sentence refers to “sampling for tare weight” as something that’s allowable as part of a Sample Scaling Agreement. However, Chapter 20 is silent regarding the authorization and use of Average Tare Weights for sales sold by total weight scaling, a method that is currently being used routinely on-the-ground.

To minimize any confusion, we recommend adding a brief section, somewhere in Chapter 20, that discusses authorization and use of Average Tare Weight for sales sold by total weight scaling.

-29.1-Administration of Export Restrictions

We recommend adding **“in the contiguous 48 states”** to the end of the first sentence.

FSH 2409.15, Timber Sale Administration Handbook, Chapter 60

-69.6-B/BT9.6 Contract Closure

We recommend replacing “should be sent promptly” with **“should be sent within 30 days”** in the second sentence of the first paragraph.

Thank you for your consideration of our comments.



Andy Geissler
Chair