Data Submitted (UTC 11): 1/11/2021 11:00:00 AM First name: Marc Last name: Estrada Organization: Forest Service, Region 3 Regional Office Title: Comments: After reading through the new 2409.19 Ch 60 I observed the following and need some clarification.

Pg.49 62.7 Example number 2 indicates that costs for opening/closing a road needed to access timber can be a service item.

Pg 51 62.81 When construction, reconstruction, or maintenance of roads necessary for product removal is a service work item in an IRSC or stewardship agreement[hellip] AND (last paragraph on page) Road work necessary for removal of timber is an appraisal item.

Pg 52 62.83 Number 1. Work on both permanent and temporary (non-specified) roads is considered road maintenance under the IRSC or agreement. Both can be an appraisal cost center commensurate with timber removal to determine feasibility.

I read it as contradictions in the direction, since opening/closing a road to access timber is likely used to remove the timber, and 62.7 says it can be a service item while 62.81 says it should be an appraisal item.