

Data Submitted (UTC 11): 8/17/2022 9:51:37 PM

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Comments: Hello,

As part of the Regional Quality Control Group (QCG), there are a couple issues that have come up regarding 2409.12 Chapter 60 that I think would benefit from changes. The first is on page 3, section 60.4 - Responsibility. (FSM 2442.04). It states "The Forest Supervisor certifies qualified, advanced, and check cruisers (FSM 2442.04b)." Having the Forest Supervisor certify cruisers is not only inefficient and counterintuitive, it also isn't feasible in many situations we face (especially in R5).

In R5, the QCG puts on trainings, creates and administers tests, and keeps records of cruiser certifications. A Forest Supervisor isn't involved in any of this process, and isn't making any of the determinations as to who is qualified. In addition, the Forest Service has transitioned to using a lot more of the Enterprise crews and collaborative non-profit groups to perform timber sale cruising field work. We have been training, testing, and certifying these Enterprise and collaborative group employees to be certified as R5 Qualified Cruisers. Since these people are not employed by a particular Forest, who should even be certifying if not a member of the Regional QCG? What Forest Supervisor would you get to sign off on their certifications?

It's my opinion, and that of my fellow colleagues in the QCG, that certification for levels of cruisers should come directly from the QCG itself. For instance, since it's the Assistant Managers (who are Check Cruiser certified) who organize, administer, and grade tests for Qualified and Advanced Cruisers. I think it would make the most sense if Check Cruisers can make the official certification for Qualified and Advanced Cruisers, and Check Cruiser level certification should require approval from a Master Cruiser (at least in R5, that would be the Regional QCG Manager). This change would save a great deal of paperwork and time, and would make the most intuitive sense.

Also, with respect to collaborative group and Enterprise employees, we don't have any guidance, even at a Regional level, of the check cruising frequency that needs to be done for Qualified Cruisers not directly employed by the Region. Perhaps this is something that needs to be handled with changes to our Regional Supplement as opposed to taking place here. But just in case, I'd like to give my opinion that collaborative group or Enterprise employees that are certified as Qualified Cruisers have their sales checked at the same frequency as Forest Service employees of the same level certification. As stated, this is probably more of a Regional concern, but I just wanted to bring it up.

Thanks for your consideration, contact me any time if you have any questions.