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Forest Service Efforts To
Change Timber Sale
Payment Method

Department of Agriculture

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BY THE COMPTROLLER GENERAL
OF THE UNITED STATES

HC2-75-096

JULY 16, 1975

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COMPTROLLER GENERAL OF THE UNITED STATES
WASHINGTON, D.C. 20548

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The Honorable Pete V. Domenici
United States Senate

Dear Senator Domenici:

In accordance with your August 20, 1974, letter and subsequent discussions with your office, we reviewed the efforts of the Department of Agriculture's Forest Service to change the primary method of selling timber in its western regions from the log measurement or scale method to the tree measurement or lump-sum method. You expressed concern about the comparable accuracy and cost of the two methods, the Forest Service's plans for converting to the tree measurement method on most timber sales by the end of the decade, and the difference of opinion between the Forest Service and the timber industry on the feasibility of the planned change.

We made our review at the Washington, D.C., headquarters offices of the Forest Service, the Department of the Interior's Bureau of Land Management, and the Office of Management and Budget; at the Forest Service regional offices in Albuquerque, New Mexico; Portland, Oregon; and San Francisco, California; and at selected Forest Service forest and district offices in Arizona, New Mexico, Oregon, and California. We also discussed the proposed change with several timber purchasers and members of national timber industry associations. We discussed the report contents with Forest Service officials and considered their views in preparing this report.

The primary timber sale method used in the Forest Service's western regions is log measurement. Under this method a timber purchaser agrees to pay for logs taken from a sale area on the basis of scaling--a Forest Service or scaling bureau estimate of the merchantable volume of wood in the logs after the trees have been cut down (felled) and cut into logs (bucked).

In recent years the Forest Service has been trying to increase its western regions' use of the tree measurement method of selling timber. Under this method the purchaser basically agrees to pay a specific amount for the timber in a sale area on the basis of a Forest Service estimate of the merchantable volume of wood in the trees before they are cut down. The estimate is derived by cruising, or physically surveying, the sale area.

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The following data, obtained from the three Forest Service western regions we selected for review, shows the portions of each region's fiscal year: 1972, 1973, and 1974 timber sales made under the tree measurement method.

<u>Region</u>	Percent of timber sales made under tree measurement method by fiscal year		
	<u>1972</u>	<u>1973</u>	<u>1974</u>
California	2.2	7.6	5.3
Pacific Northwest	3.6	3.8	4.1
Southwestern	5.9	3.0	3.7

The timber industry has generally opposed the increased use of the tree measurement method in the western regions claiming that the Forest Service has not demonstrated the effectiveness and efficiency of the tree measurement method compared with the log measurement method. The Forest Service believes, however, that the tree measurement method should be as effective as the log measurement method, that it should decrease manpower requirements and the overall costs of timber sales, and that it should increase timber utilization.

To confirm its beliefs, the Forest Service has attempted, through test sales, to obtain data to compare the two methods. As discussed on pages 5 to 10, however, the test sales that had been carried out in the three regions covered in our review had not been adequate for this comparison.

EFFORTS TO CHANGE SALE METHOD

A chronology of major events related to the Forest Service's efforts to increase the use of the tree measurement method is enclosed. (See app. I.) Our review of the records relating to these events and our discussions with Forest Service and Office of Management and Budget officials indicate that:

- Early Forest Service efforts to increase the use of the tree measurement method lacked specific headquarters direction and guidance, resulting in inconsistencies among the regions in carrying out tree measurement sales and test sales to compare the two methods.

- The emphasis on increased tree measurement sales has come not only from within the Forest Service but also from the Department's Office of Audit (formerly called Office of the Inspector General), the Office of Management and Budget, and a 1971 act mandating that the Director of the former Cost of Living Council to consider changes in Forest Service timber sales procedures.
- The Forest Service has recognized the need to develop adequate techniques and to train people to make tree measurement sales, since the move toward increasing such sales began.
- The tree measurement method has been used for many years in the Forest Service's eastern and southern regions, on some thinning and young-growth sales in the western regions, and by the Bureau of Land Management. At issue, however, is the extension of tree measurement to sales of defective, old-growth trees which make up a large part of the Forest Service's timber holdings in the western regions. The timber industry has maintained that a change in the measurement method will bring about many uncertainties, additional costs, and large financial risks in the defective stands of high-value western timber and that there is no conclusive evidence that tree measurement, even if done well, will actually cost less than log measurement.
- Although the Forest Service proposed a timetable in mid-1973 to gradually increase the volume of timber sold by tree measurement from 5 percent by the end of 1973 to 90 percent by the end of 1980, the Forest Service has abandoned the timetable because of concerns expressed by the Senate Appropriations Committee (see p. 16) and because of the uncertainty of funding for tree measurement sales.
- The Forest Service does not want to abandon its efforts to increase the use of tree measurement sales because it believes that there are long-range benefits in savings and management flexibility which will justify using tree measurement for a high proportion of sales, including those in some areas where other measurement methods are used. However, the Forest Service

recognizes that, before moving ahead with tree measurement, it will have to:

1. Establish through test sales the comparative cost and accuracy of volume and value estimates under each method.
2. Use tree measurement only where it has the skills and manpower to do a professional and accurate sale preparation job.

INDUSTRY VIEWS ON CHANGE OF SALE METHOD

Timber industry representatives told us that they were generally opposed to the Forest Service's plan to increase its western regions' use of the tree measurement method of selling, except for small, low-value timber sales where the financial risk is low and the cost of scaling is not justified. They said that their primary concern with the proposed increase were:

- The Forest Service's inability to accurately estimate the volume of usable wood under the tree measurement method due to the:
 1. Difficulty of estimating volume in highly defective timber.
 2. Large turnover of Forest Service personnel.
 3. Varying accuracy reliability among Forest Service personnel.
- The resulting increased costs of tree measurement sales to timber purchasers because:
 1. Each prospective purchaser would need to cruise the sale area to assure himself of the accuracy of Forest Service volume estimates.
 2. Additional scaling and recordkeeping would be required to develop scaling data so that adequate production controls could be maintained. (The Forest Service has customarily provided much of this scaling data although timber sales contracts do not require that it do so.)

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The industry representatives emphasized the need for industry participation in any Forest Service study or comparison of the two sale methods. They believe that the solution to the differences of opinion about the accuracy and cost of each method is to get comparable data for each method and demonstrate to the Congress, the Office of Management and Budget, and the public which is the best method of measuring timber for sale.

REGIONAL TEST SALE PROGRAMS WERE NOT
ADEQUATE TO COMPARE SALE METHODS

The three regions selected for review had carried out only limited test sale programs and had not developed sufficient volume and cost information on their test sales to compare the accuracy of the volume estimates and the costs of the two sale methods. These weaknesses are attributable to a lack of adequate guidelines and procedures and insufficient funds for conducting test sales.

At the time of our fieldwork, seven test sales had been completed and eight were underway in the three regions. The completed test sales are listed below.

<u>Region and name of test sale</u>	<u>Date of sale</u>	<u>Date completed</u>	<u>Estimated total value</u> (thousands)
California:			
Rim	10/72	10/73	\$1,076.6
Joy	6/73	12/73	209.3
Nutmeg	4/73	10/73	735.3
Pacific Northwest:			
Claypool	5/71	9/72	23.5
Fleece	4/73	11/73	342.4
Three Pee	3/73	6/74	214.6
Southwestern:			
Water Canyon	12/72	9/74	249.3

Need for adequate funding

The Forest Service had not provided its regions with special funds for their test sale programs; instead, each region was requested to fit the test sales into its regular

timber sale program as funding and manpower would permit. As a result, the sales volume of each region's test sales was a very small part of its total sales volume, as shown in the following table.

<u>Region</u>	Sales volume of test sales as percent of total sales volume by fiscal year			
	<u>1971</u>	<u>1972</u>	<u>1973</u>	<u>1974</u>
California	0	0	2.4	1.1
Pacific Northwest	0.2	0	0.04	0.03
Southwestern	0	2.3	2.5	0

Officials in each region said that the lack of adequate funding and manpower had limited their ability to carry out comprehensive test sale programs. In test sales, two measurements--one to measure the standing trees and one to measure the cut timber--need to be made for comparison purposes. According to one region, these double measurements are costly. A Forest Service headquarters official agreed that the lack of funding had inhibited the regions in conducting their test sale programs.

Need for adequate guidelines and procedures

Because national guidance had not been provided for conducting test sales, each region had structured its test sale program to achieve its own objectives, which were generally as follows.

--California region officials said that their region's test program was initially intended to give district personnel experience in setting up tree measurement sales and to assess the impact on district operations. They said that efforts to compare the costs of tree measurement and log measurement sales were included in their test program only after industry pressure began to mount following a Forest Service announcement in May 1973 of the planned conversion to tree measurement sales by the end of 1980.

--Pacific Northwest region officials said that their region's test sale program was designed primarily to

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investigate the technical aspects of tree measurement and to determine what conditions affect the accuracy of volume-estimating techniques for different types of timber. No official data are available on the cost data for comparing tree measurement techniques for measurement sales.

- Southwestern region officials said that their region's test program was to give forest managers more experience using the tree measurement method to enable them to select which type of tree measurement method to test, should additional funding and manpower become available for this purpose.

A headquarters official acknowledged that, until March 1975, the regions had not been provided adequate guidelines and procedures for conducting test sales. According to the March 1975 guidelines and procedures, the western regions are to develop data for both sale methods on (1) the accuracy of volume estimates, including determinations of the volume of usable timber left in sale areas by purchasers, and (2) total Government and purchaser sale preparation and contract administration costs.

Need for complete volume data

To compare the accuracy of volume estimates under the two methods, complete information is needed on the total volume of merchantable timber to be sold from the sale area. In estimating volume under the tree measurement method, the Forest Service considers all trees that are to be harvested. Under the log measurement method, however, only the timber removed from the sale area is measured. Forest Service headquarters officials told us that, to provide comparable volume data in a log measurement sale, a utilization scale--an estimate of the volume of merchantable timber left in the sale area by the purchaser--should be made with the estimated volume's being combined with the volume of timber removed.

A utilization scale had been made on only one of the seven completed test sales, the Fleece sale in the Pacific Northwest region. On the six other sales:

- A California region official said that the region had informally advised district personnel to make utilization scales only if utilization for test sales appeared

to be worse than that normally considered acceptable for log measurement sales.

--Pacific Northwest region officials said that, in preparing their test sales plans, they had overlooked the need for utilization scales and had not recognized this need until two of their test sales had been completed.

--Southwestern region officials said they thought a utilization scale was not necessary for their completed test sale because district personnel observations of the sale area had indicated good utilization with little merchantable material left behind.

Forest Service headquarters officials said that they recognized the need for utilization scales on their test sales early in 1974 and that the March 1975 procedures provided for them.

Need for complete cost data

To compare the combined Government and purchaser costs of the two sale methods, adequate cost data relating to each method must be developed. However, no cost data was developed for the three Pacific Northwest region sales and the data developed for the four sales in the other two regions was inadequate.

The data developed for the Southwestern region sale was limited to the costs related to felling, bucking, and scaling the sample trees used to estimate timber volume for the tree measurement method. Not developed were the Forest Service's other contract preparation costs; its contract administration costs; the purchaser's costs; and changes in the purchaser's costs which would result from the change in sales method.

For the three California region sales:

--Purchaser costs and changes in such costs were not developed.

--Estimates of log measurement sale costs included an overhead allowance of 40 percent of direct costs while the overhead costs associated with preparing and administering the tree measurement sales method were not determined or considered. For example, the labor costs

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used in computing tree measurement sale costs were based on wage rates exclusive of the Government's costs of employee leave time or health and retirement benefits.

--the log measurement sale preparation and administration costs considered in the comparison were average costs developed from regionwide data on the number of staff-hours required to prepare and administer the sale. This regionwide data did not reflect the actual log measurement sale preparation and administration cost experience of the districts involved.

California region officials said that the omission of overhead costs for the tree measurement method would bias any cost comparisons and that regionwide data on staff-hour requirements was useful only in very broad terms and might vary widely from the experience of a particular district. These officials said that regionwide averages were used for lack of better data and that development of accurate data would require preparing each sale twice--the first time to tree measurement standards and the second time to log measurement standards. They said that it was not feasible to do this additional detailed and costly work with the limited funding and manpower available.

A headquarters official said that the Forest Service recognized the need for complete cost data late in 1973 as a result of a combination of industry and congressional concern and the Forest Service's desire to support its belief that the tree measurement method would be less costly than the log measurement method. This official believed that the March 1975 guidelines and procedures for collecting test sale data would provide the needed cost data.

According to the official, however, specific funds will not be designated for collecting this information. Instead, the regions will be required to fit the test sales into their regular timber sale programs as funding permits. The official said that a date for completing the test sale program had not been determined and that completing the program would probably depend on the availability of funding and manpower within each region.

CONCLUSIONS

Because the Forest Service has not provided special funds and adequate guidelines and procedures for comparing the tree measurement and log measurement methods, the relative accuracy and cost of the two sale methods has not been determined. The Forest Service has issued revised guidelines and procedures for developing accuracy and cost data for its test sale program. If the regions properly implement them and headquarters coordinates and monitors their implementation, these guidelines and procedures should result in the development of data adequate for comparing the two sale methods. However, the Forest Service has not determined when the test sale program is to be completed and does not currently plan to provide any special funding for the program.

We recognize that special funding for timely completion of the test sale program must compete with other Forest Service priorities, but, until the test sale program is completed, the Forest Service will not be able to provide well-documented evidence to settle the questions of effectiveness and costs of the two methods.

If there are net benefits to be gained from using the tree measurement method, as the Forest Service believes, these benefits should be documented and attained as soon as possible.

RECOMMENDATIONS

We recommend that the Secretary of Agriculture direct the Chief, Forest Service, to:

- Set dates for timely completion of test sales and give high priority to meeting those dates.
- Take steps to provide the Forest Service's regions with the funds needed to conduct adequate and timely test sales.
- Evaluate and report to the appropriate congressional committees the results of test sales as they are completed for specific forests, tree species, and timber conditions.
- Use the tree measurement method for all forests, tree species, and timber conditions for which test sales

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have shown net benefits to be gained from its use and where Forest Service personnel have the capability to prepare tree measurement sales professionally and accurately.

62- AS your office agreed, we are sending copies of this report to the Senate and House Committees on Appropriations and on Government Operations; to various other congressional committees and subcommittees; and to Senators James A. McClure and Bob Packwood and Representatives Patricia Schroeder, Al Ullman, and Don H. Clausen, because of their interest in this matter. We are also sending copies to the Director, Office of Management and Budget, and to the Secretary of Agriculture.

Sincerely yours,
James B. Altsch

Comptroller General
of the United States

CHRONOLOGY OF MAJOR EVENTS RELATED
TO FOREST SERVICE EFFORTS TO CHANGE ITS
WESTERN REGIONS' PRIMARY METHOD OF SELLING TIMBER

AUGUST 1970

The Office of the Inspector General, Department of Agriculture, issued a report stating that, in its opinion, measuring each log (100-percent scaling) was obsolete and did not provide for the economical use of funds or the efficient use of employees. The report said that the Forest Service had done much development work on more efficient timber measurement systems, such as sample scaling and tree measurement with the use of statistical sampling, but that industry opposition had been a severe deterrent to implementing these systems.

The report recommended that the Chief of the Forest Service establish a national policy to eliminate log scaling as a basis for payment, whenever possible, by phasing in other, more efficient measuring methods.

APRIL 1971

The Forest Service advised its regions that it agreed with the Office of the Inspector General's recommendation and would proceed to implement it as rapidly as possible. It said, however, that the regions should not increase the volume of timber sold by the tree measurement method until adequate techniques had been developed and enough employees had been trained in its use, particularly where large, defective timber was involved. The Forest Service said that one region was testing the efficiency of several tree measurement techniques and that other regions should get tests underway promptly because such tests take time to consummate. It said that, until satisfactory techniques were developed, the regions should continue existing sample-scaling arrangements and efforts to convert 100-percent scaling to sample scaling.

SEPTEMBER 1971

The Forest Service told the Office of the Inspector General that the Forest Service was expanding the use of the tree measurement method, sample tree measurement, and sample scaling but that, before any large-scale expansion could occur, it needed to develop some expertise in these methods and to build industry confidence in areas where these practices were new.

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OCTOBER 1972

The Federal Timber Purchasers Committee, a timber industry group which meets periodically with Forest Service officials, questioned the speed with which some Forest Service regions were moving to tree measurement sales, alleging that these regions were not living up to the Forest Service's prior commitment to develop sound procedures before increasing the number of such sales. The Forest Service said that its objective was to increase tree measurement sales considerably but that it expected its regions to use management systems which would produce acceptable results.

MARCH 1973

The Secretary of Agriculture and the Director of the Cost of Living Council appointed an interagency task force on softwood timber and plywood to consider changes in Forest Service timber sale procedures.

MAY 1973

The Chief of the Forest Service, on the basis of the work of the interagency task force on softwood timber and plywood, announced that, as one of the actions to meet increased timber productivity goals, conversion from the log measurement system of paying for Forest Service timber to one in which payments would be based on tree measurement methods would be pursued and be achieved throughout the Forest Service as soon as feasible.

MAY 1973

The Forest Service sent its regions the following tentative timetable for converting to tree measurement.

<u>By December 31</u>	<u>Percent</u>
1973	5
1974	15
1975	35
1976	50
1977	60
1978	75
1979	80
1980	over 90

The Forest Service's Director of Timber Management told each region to prepare detailed plans, by national forest,

for increasing tree measurement sale offerings to meet the goals of the proposed timetable.

AUGUST 1973

The Forest Service included \$1 million in its budget request for fiscal year 1975 to partially cover the costs of converting to the tree measurement method. The Department deleted the fund request in September 1973 because of higher priorities.

NOVEMBER 1973

At a tree measurement conference of Forest Service headquarters and field officials, it was pointed out that, to accomplish the transition from log measurement to tree measurement, a well-planned implementation program was needed to establish confidence in the equity of such a change. Also pointed out were the needs for (1) national instructions, which would establish the bases for accuracy standards for tree measurement sales, and (2) additional financing, to offset the costs of the conversion. In addition, it was noted that the following considerations must be analyzed carefully in any comparison of tree measurement and log measurement methods.

- The relative costs of both methods.
- The experience of personnel involved in making these comparisons.
- The sampling-error standard used for the tree measurement method.
- The accessibility and conditions of timber in the sale area.
- Flexibility in use of Forest Service personnel.

NOVEMBER 1973

At a meeting with Forest Service officials, the Federal Timber Purchasers Committee stated that it intended to talk further with the Office of Management and Budget (OMB) and western congressional delegations to try to prevent the Forest Service's making widespread use of tree measurement in the West. The Forest Service said that it intended to proceed only as rapidly as its ability to make acceptably accurate volume estimates permitted, giving priority to those situations in which maximum long-term cost savings could be realized. The Forest Service said it expected to

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make considerable progress toward using tree measurement in the next several years but that it could not predict whether implementation plan targets could be met.

APRIL 1974

In a briefing paper distributed to the western regions, the Forest Service said that, because additional financing had not been received for fiscal year 1975, the proposed timetable for converting to tree measurement sales had to be reviewed. It said also that the western regions had already reduced their estimates of progress by 1980 to 48 percent but that this figure might need to be reduced further.

The Forest Service added that:

- It appeared that its past direction had resulted in inconsistencies among the regions and that more specific direction was indicated.
- Its intent continued to be to measure timber in the manner which most effectively met both public and purchaser needs.
- Although it could not visualize eliminating all scaling, it continued to believe that, in the long run, tree measurement would be shown to best satisfy these needs. However, it did not want to move so fast that it made mistakes and risked discrediting the value of tree measurement. Therefore it was thinking in terms of delaying making any additional tree measurement sales in high-value, high-defect stands until it had accumulated more comparative data on costs and volumes.
- To obtain that data, it would prepare as many sales as possible to tree measurement standards but would sell them as scaled sales. Exceptions might be necessary for individual sales where, for some reason, scaling could not be provided at reasonable cost.
- It would continue to increase using tree measurement sales of relatively sound and/or low-value timber where experience had shown this method to be satisfactory.

JUNE 1974

The Forest Service sent its regions proposed general guidelines for the tree measurement sale program and emphasized the need for agreement on guidelines for using tree measurement sales in high-value, high-defect, old-growth timber stands. The regions were requested to prepare as many test sales as financing would permit and each forest which planned to offer old growth by the tree measurement method was asked to make at least one test sale in fiscal year 1975, if the necessary preparation work could be done.

AUGUST 1974

The Senate Appropriations Committee, in its report 1/ on the Forest Service's fiscal year 1975 appropriations, said:

"In the expenditure of funds appropriated by this Act, the Forest Service should not extend the use of tree measurement systems for timber sales in Forest Service Regions where there is not well-documented evidence that (1) the practice will provide volume data for payment purposes that are as accurate and reliable as those provided for log scaling, (2) the combined cost to the Government and timber purchaser for timber measurement in tree and log form is not increased, except for investigative purposes."

The Committee added:

"For the past two years the Forest Service has undertaken a program to increase the sales of timber on a tree measurement basis. * * *

"Timber prices throughout the Nation have continued to rise and it is important that both the buyer and seller for the National Forest timber be able to rely on volume measured as the basis for payment. It is recognized that current log scaling practices include truck scaling, weight scaling, water scaling, and sample scaling. Where the practices are sound they should be continued unless the above criteria are met.

1/S. Rept. 93-1069, Committee on Appropriations, 93d Cong., 2d sess., Aug. 2, 1974.

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"Tree measurement methods for National Forest timber sales have been used satisfactorily throughout the eastern National Forests and on certain kinds of timber sales on the western National Forests. However, timber sales in highly defective and valuable timber stands on the western National Forests have normally been sold by log scaling procedures.

"Tree measurement procedures in such timber have been demonstrated to be quite accurate. However, the method has not enjoyed complete confidence by many purchasers of defective timber who might well be faced with severe financial losses if errors occur. Although we recognize the Forest Service has expanded tree measurement sales in the western United States to save cost in both man-hours and dollars, we request Forest Service not to expand tree measurement sales further until the criteria cited above have been met."

OCTOBER 1974

The Director of Timber Management told GAO that the Forest Service had provided little direction to its regions from 1970 to 1973. He said that during this period the headquarters office was mainly trying to encourage the use of tree measurement methods. He said that the Forest Service had abandoned its conversion timetable because of (1) the concern expressed by the Senate Appropriations Committee and (2) the uncertainty of future funding for the tree measurement testing program.

OCTOBER 1974

The Director of Timber Management advised the western regions (excluding Alaska) of the congressional concern about the program to increase the sale of timber by the tree measurement method. He said that the Forest Service did not want to abandon its efforts to increase the use of this method but that, in view of the congressional concern, each region should strive to keep the volume offered at about the same level as last year. The Director also finalized the tree measurement sale program guidelines, sent to the regions in June 1974, relating to sale size, defective timber, road construction costs, value of species, and personnel qualifications.

The Director suggested that test sales be made to establish a "track record" in broad timber types where tree measurement had not been used previously. He said the two greatest items of concern in the tree measurement program were accuracy and costs and that the Forest Service needed sound, defensible data to support its belief that tree measurement sales could be highly accurate while achieving reduced costs.

The Director said that Forest Service headquarters would develop and issue procedures and a format to insure that uniform data would be collected on time and costs involved in preparing and administering tree measurement sales and that industry should be asked to cooperate in the program by providing time and costs involved in reviewing and administering the sales from industry's standpoint. He said that the Forest Service needed to make a thorough and complete comparison of savings to justify moving ahead with tree measurement.

NOVEMBER 1974

An OMB official told GAO that OMB first got involved in the tree measurement question in 1973. He said that OMB's interest came about indirectly as a result of increasing timber prices which got OMB involved in looking for ways to increase efficiency and decrease costs. He said that, at that same time, the Forest Service and the Bureau of Land Management were doing work for the inter-agency task force on softwood timber and plywood and that both agencies felt that tree measurement was one method by which timber utilization could be increased.

The OMB official added that OMB had no problems with tree measurement because both agencies said it would save money and increase efficiency but that he planned to ask the agencies to test industry's allegations that tree measurement was more costly and less accurate than log measurement.

JANUARY 1975

The Forest Service sent its western regions (excluding Alaska) proposed procedures and a standardized format for collecting costs and time on test tree measurement sales. According to these procedures, both Government and purchaser data was to be developed or obtained to compare time and costs for preparing and administering log measurement and tree measurement sales on the same sale area. Also the regions were to determine, by measuring or estimating the

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amount of usable material left on sale areas, whether utilization differed greatly from contract specifications.

MARCH 1975

The Forest Service finalized the procedures proposed in January 1975 for collecting time and cost data on test sales and asked that individual test sale results be submitted to the headquarters office as they were compiled.

A Forest Service headquarters official told GAO that specific funds would not be designated for collecting this information. Instead, the regions would be required to fit the test sales into their regular timber sale programs as funding permitted. The official said that a date for completing the test sale program had not been determined and that completing the program would probably depend on the availability of funding and manpower within each region.