



**File Code:** 1950

**Date:** March 22, 2004

**Route To:**

**Subject:** Emergency Situation Determination (36 CFR 215.10[b])

**To:** Regional Forester, R-6

I am requesting an Emergency Situation Determination for the Toolbox Fire Recovery Project Environmental Impact Statement (EIS) and Record of Decision (ROD) due to the substantial loss of economic value to the Federal Government that would occur if implementation of the decision were delayed.

### **Introduction**

This request for Emergency Situation Determination based on Economic Criterion is due to the following reasons:

- **Decreased Return:** A 105-day delay of salvage harvest will result in an overall value decline of 57 percent and the loss of 4,700 mbf of saw timber.
- **Increased Cost:** Approximately 7,287 acres of salvage harvest units will need fuels treatment site preparation prior to reforestation.
  - Given the larger amounts of fuels remaining, the use of more economical means for treatment is precluded.
  - Current project design, as discussed in the EIS, anticipated a need for seedlings to be planted on approximately 4,500 acres in 2005.
  - Delayed fuel treatments for these acres will delay planting, and reduce first-time success. Seedlings ordered for these acres will be destroyed and replacement seedlings ordered, at an additional cost.
- **Other Factors Likely to Contribute to Economic Loss:** Delayed implementation of salvage harvest would result in logging operations starting near the beginning of fire season. The potential for fire shutdown may be sufficient to dissuade potential purchasers from bidding.

### **Emergency-Triggering Event and Affected Area**

On July 12, 2002, a lightning storm ignited 67 fires on the Fremont-Winema National Forests. Two of these fires, the Toolbox Fire and the Silver Fire became the primary fires within the Toolbox Complex, which burned through the remainder of July and into August. Results included approximately 85,000 acres burned, including about 49,500 acres of National Forest land, 8,000 acres of Bureau of Land Management land, and 27,500 acres of private land. This is the largest wildfire on the Silver Lake Ranger District since the founding of the Forest Service. During the previous 55 years, when record keeping has been most reliable, approximately 8,500 acres have burned in approximately 600 wildfires within the 152,000 acre, eight-subwatershed cumulative effects analysis area.

On National Forest System lands within the Toolbox Fire Recovery Project area, mortality mapping (based on September 2002 conditions) reveal that high mortality (areas where 51 to 85 percent of the trees were killed) or very high mortality (86 to 100 percent of the trees killed) occurred on approximately 17,500 acres, or about 53 percent of the forested acres. Another 9,300 acres (about 28 percent of the forested acres) experienced more moderate mortality (26 to 50 percent of the trees killed). The remainder of the forested areas of National Forest System lands within the fire perimeter experienced varying lesser degrees of mortality.



### Pending Actions

The Toolbox Fire Recovery EIS analyzed specific combinations of actions to promote the development of future sustainable late and old structural forest on approximately 20,800 acres. This combination of actions includes salvage removal of fire and insect-killed trees with follow-up fuels reduction, fuels treatment outside of commercial salvage units, site preparation, and planting. Considered separately, preferred Alternative G would implement commercial salvage harvest on approximately 10,230 acres, fuel treatments on about 20,200 acres, and conifer planting on about 20,200 acres.

This request applies to 7,287 acres of commercial salvage of sawtimber, which is subject to deterioration, and post harvest fuels treatment. Connected actions to this include temporary roads, road reconstruction and road maintenance. The remaining areas of salvage in preferred Alternative G are not considered suitable for sawtimber, but instead for fiber, and as such are not as susceptible to loss of value. This request also applies to 4,500 acres of fuels treatments as site preparation for reforestation outside of commercial salvage units. These treatments were prioritized based on the potential for loss of economic value to the Federal Government.

Timing of these activities is critical to achieving the purpose and need of the Toolbox Fire Recovery Project. Delayed implementation will have a negative economic impact to the implementation of recovery projects. Due to expected rapid decay rates of fire-killed trees (especially ponderosa pine), the timely harvest of trees is essential to recover their economic value. If removal of trees does not commence rapidly, commercial value could be reduced to the point that sales are no longer economically viable and costs of removing trees would exceed revenue produced. In that scenario, no funds from the sale of fire-killed trees would be available to contribute to post-fire restoration and recovery activities.

### Affected Resources and Effects

Timing of salvage logging is critical to achieving the purpose and need of the Toolbox Fire Recovery Project. If salvage harvest does not commence until mid-summer 2004, continued deterioration may make the sales uneconomical. The following points are important considerations:

1. **Reduced Returns** - The salvage harvest will produce a saw timber volume of approximately 30,904 mbf, an amount already reduced to account for existing volume loss.

A 105-day delay of salvage harvest will result in an overall value decline of 57 percent and the loss of 4,700 mbf of saw timber. Trees 14 inches and less in diameter at breast height (dbh) will become checked, cracked, and decayed to the extent that they are no longer merchantable as saw timber. These trees will not be harvested. There will be an additional value and volume loss in the remaining trees accounting for approximately 5 percent of the overall volume loss. The loss of timber value is estimated as follows.

30,904 mbf @ \$34.16 /mbf =	\$1,055,681	Value of Salvage Timber Now
26,202 mbf @ \$17.48 /mbf =	458,011	Value of Salvage Timber Delayed 105 Days
	<hr/>	
	\$ 597,670	Total Lost Returns Due to Delay

2. **Increased Costs** - 105-day delay in salvage harvest will result in trees 14 inches in dbh and smaller not being harvested. The larger trees in these stands will be harvested but with considerably more material left behind than if the stands were harvested sooner. As discussed in the EIS, approximately 7,287 acres

of salvage harvest units will need fuels treatment site preparation prior to reforestation. Given the larger amounts of fuels remaining, the use of more economical means for treatment is precluded. Treatment costs for these fuels are expected to raise an average of \$170/ acre based upon recent contracts issued for this type of work. The estimated increase in cost for fuels treatment prior to planting is:

Fuel treatment is a required prerequisite to reforestation. Current project design, as discussed in the EIS, anticipated a need for seedlings to be planted on approximately 4,500 acres in 2005. Delayed fuel treatments for these acres will delay planting. Seedlings ordered for these acres will be destroyed and replacement seedlings ordered, at an additional cost. The additional cost for seedlings, depending on the availability of contractors and weather, is estimated to be:

\$100,000 to \$400,000 Cost of Replacement Seedlings due to Delay

3. Other Factors Likely to Contribute to Economic Loss - Delayed implementation of salvage harvest would result in logging operations starting near the beginning of fire season. While we expect that fire restriction waivers may be issued liberally for harvest operations, conditions are likely to exist that will lead to some shutdown of operations. The potential for fire shutdown may be sufficient to dissuade potential purchasers from bidding.

Salvage harvest timber sales are financially risk-prone for prospective purchasers. Salvage timber condition continues to decline due to a number of factors including decay, stain, drying, and insects. Timber condition relates directly to a purchaser's recoverable value. The longer the delay before harvest the more difficult it becomes to determine the condition of the timber. This presents an ever-increasing level of financial risk to prospective purchasers. This risk to prospective purchasers increases the chance that these sales will not be harvested.

During the past year the Fremont-Winema National Forests sold two fire salvage sales. In July 2003, Cub Fire Salvage Sale was sold to the sole eligible purchaser for the Federal Sustained Yield Unit at appraised rates. In July 2003, the Skunk Fire Salvage Sale was offered and received no bids. This sale was subsequently sold at appraised rates. These sales were both offered for sale within one year of the fire and attracted only very limited interest.

Our ability to attract purchasers for the harvest of salvage timber erodes over time and is directly related to the decline in value of the timber over time. A failure to attract purchasers for the harvest of salvage volume will lead to further increases in cost for implementation of the Toolbox Fire Recovery Project.

### **Planning Process**

The Notice of Availability for the Toolbox Fire Recovery Project Draft Environmental Impact Statement was published in the Federal Register on Friday, October 3, 2003, and the comment period ended November 17, 2003. The Notice of Availability for the Toolbox Fire Recovery Project Final Environmental Impact Statement will be published in the Federal Register on Friday, March 26, 2004. If an Emergency Situation is not granted, the Record of Decision will be published at the end of March, followed by a 45-day appeal period. If an exemption from stay is granted, the Record of Decision would be issued in April, 30 days after the Notice of Availability for the Final Environmental Impact Statement.

### **Relationship to Elements of NEPA**

The commercial salvage units and fuels treatment activities identified for exemption are contained in preferred Alternative G in the Toolbox Fire Recovery Project Final Environmental Impact Statement. Alternative G places an emphasis on using active management to achieve post-fire recovery, particularly in response to the purpose and need to develop forest stands with structural conditions closer to Historic Range of Variability (HRV), while providing some commercial timber production. It focuses on fuels

reduction and long-term fire suppression effectiveness (a direct contributor to promoting forest stands with structural conditions closer to HRV).

The purposes of this project, identified in Chapter 1 of the FEIS, are to:

- As quickly as feasible, create sustainable forest, stream, and riparian habitats within the project area that meet the desired conditions established by the Fremont National Forest Land and Resource Management Plan (LRMP).
- Provide the highest production of commercial timber and jobs consistent with the first purpose above.
- Retain the most snag and down wood habitat consistent with the first purpose above.
- Retain the most mule deer habitat effectiveness consistent with the first purpose above.
- Retain the most roaded access consistent with the first purpose above.

There are six underlying needs for the project (identified in Chapter 1 of the FEIS):

- *The need for wildlife habitat within the project area, including snags and down wood, and live forest.* The LRMP directs retention of certain levels of these habitat components. The objective of this direction is to ensure sale activities are designed to retain or develop habitat to provide for the needs of snag and down wood dependent species, old-growth dependent species, threatened, endangered and sensitive (TES) species, and mule deer.
- *The need for lower surface fuel loadings within the project area.* The LRMP establishes the objective of creating a healthy forest condition, including protection from the damage caused by uncharacteristic wildfire. With lower fuel loads, future fire behavior would be more similar to the low-intensity wildfires that previously characterized fire patterns in the low-elevation forests in this area. Lower fuel loads would reduce the risk of adverse effects to vegetation and soils that can result from long-residence heat caused when heavy down fuels burn. Lower fuel loads would also allow expanded use of prescribed fire, which is a relatively economic way to maintain healthy forest conditions and develop open park-like stands.
- *The need for high-quality fish and riparian habitat within the project area.* The LRMP establishes an objective of managing all waterbodies (Management Area 15) to maintain or improve water quality, fish habitat, recreation opportunities, and riparian habitat for dependent wildlife species. The proposed activities have been determined to be compliant with INFISH in regard to attainment of Riparian Management Objectives.
- *The need for endemic, rather than epidemic, populations of bark beetles within the project area.* The LRMP establishes the objective of creating a healthy forest condition, including protection from the damage caused by insects.
- *The need for forest stands with structural conditions closer to the Historic Range of Variability (HRV) within the project area.* The LRMP, as amended, provides direction to move forest stands toward these conditions, including the development of large diameter, open canopy structure and open park-like stands. For eastside low-elevation forests, such conditions offer the best likelihood of sustainability over the long term. Developing a forest with structural conditions closer to HRV requires fuel loads low enough to safely re-introduce fire as a periodic disturbance agent. The 2002 fires created forest conditions inside the project area that are very different from the HRV. Compared to the HRV for the area, there are now many more standing dead trees (of

all sizes) and far fewer live large, old trees. Also, the project area will contain much higher fuel loads than were present historically as the dead trees begin to fall.

- *The need for commercial timber production within the project area.* The LRMP directs or authorizes the production of timber, including salvage timber, from many of the management allocations within the project area, within standards and guidelines established to meet a variety of other resource objectives. There is currently a short-term opportunity, dependant on harvest occurring prior to deterioration, to capture value from the trees killed in the fire and a long-term opportunity to develop a sustainable forest that will yield future commercial volume in accordance with management direction. In some parts of the project area there is a need for some road reconstruction and some temporary road development so the dead trees can be removed safely and economically.

### **Public Involvement**

Public involvement followed two basic pathways: that which involves the Klamath Tribes, characterized by a government-to-government consultation process; and that involving the general public.

1. Klamath Tribes - The Toolbox Fire Recovery Project was initially introduced to Klamath Tribal representatives at the August 2002 “pre-SOPA meeting” (SOPA is the acronym for “Schedule of Proposed Actions”). Under the terms of the 1999 “Memorandum of Agreement between The Klamath Tribes and the U.S. Forest Service” (U.S. Forest Service and Klamath Tribes 1999), projects that will be newly listed on an upcoming SOPA are first subject to pre-public scoping consultation. Following the introduction of the project, the Klamath Tribes Natural Resource Department assigned Rick Ward, Tribal Biologist, as the department’s representative for the project. Mr. Ward was involved with the interdisciplinary team during the initial drafting of the proposed action during October and November 2002.

In October 2002, Elwood Miller Jr., The Klamath Tribes Natural Resources Director, granted the Forest Service request to proceed with expedited public scoping as outlined in the 1999 Memorandum of Agreement. During this same time period, Gerald Skelton, The Klamath Tribes Culture and Heritage Director, began direct communication with the Cultural Resource specialists on the Toolbox Interdisciplinary Team. This resulted in cultural resource field reconnaissance crews being assembled that were jointly composed of personnel from the Klamath Tribes and the Fremont-Winema National Forests. These crews performed inventories for approximately nine weeks during the fall of 2002. Surveys using a similar make-up began again in late spring 2003.

During internal Forest Service review of the draft of the DEIS (June 10, 2003, to August 1, 2003), complete copies of the draft document were provided for Klamath Tribal review, concurrent with internal Forest Service review. A 45-day comment period for the Toolbox Fire Recovery Project Draft Environmental Impact Statement (DEIS) was provided from October 4, 2003, until November 17, 2003. During this 45-day period, a meeting involving the Klamath Tribal Director for Natural Resources, the Tribal Wildlife Biologist, the Fremont-Winema Forests Supervisor and members of her staff was held to discuss the comments that the Klamath Tribes were preparing for submittal. The purpose of the meeting was to expand upon some of the points that were being drafted into the Tribal comment letter and freely exchange ideas on both the Toolbox project and overall management of the National Forest.

Primary concerns that were raised through the sum of all consultation with The Klamath Tribes pertained to road management considerations within former Klamath Reservation lands, cultural resource protection, and protection of riparian resources and mule deer habitat (particularly winter and transition range).

2. **General Public** - A Notice of Intent to prepare an Environmental Impact Statement was published in the Federal Register on November 1, 2002. News releases were published in area newspapers in November and December 2002. The proposed action was contained in a scoping packet that was initially mailed to the public and other agencies for comment on November 12, 2002. As the public outreach process provided additional names of interested persons, the scoping packet was subsequently mailed to additional addresses through late December 2002. A total of 214 individuals or organizations received scoping packets. Written comments, letters, electronic mail responses, or phone calls were received from 15 individuals, agencies, businesses, and organizations during the scoping on the proposed action.

The Toolbox Fire Recovery Project was first listed in the Fall 2002 Schedules of Proposed Actions (SOPA). Notification that the Responsible Official *is requesting* an emergency situation determination, as provided for in 36 CFR 215.10, first appeared in the Winter 2003 SOPA (December 24, 2003).

Open Houses were held in Christmas Valley and La Pine, Oregon, on May 12 and 13, 2003.

The DEIS was made available to the public beginning in late September – early October 2003. Copies of the complete DEIS were mailed on September 25, 2003, to those who had previously requested it. Notices informing the public of the DEIS availability were published in the Federal Register, Klamath Herald and News, The Bulletin (Bend, Oregon), and the Lake County Examiner on October 3, 2003 (Lake County Examiner, a weekly, was actually October 2, 2003). These public notices indicated that the responsible official *may* request an emergency situation determination, as provided for in 36 CFR 215.10. The October 3, 2003, Federal Register notice established a public comment period that ended November 17, 2003. The DEIS, and all supporting specialists reports, were posted on the Forest website, by mid-September 2003, for public review.

A 45-day comment period for the Toolbox Fire Recovery Project Draft Environmental Impact Statement (DEIS) was provided for interested and affected members of the public, including appropriate local, state, and federal government agencies and Tribes. This comment period lasted from October 4, 2003, until November 17, 2003.

During the DEIS comment period, additional public outreach occurred. A public workshop was held in Silver Lake on November 6, 2003. Comments were received from 18 individuals and/or organizations.

3. **Issues** - Key issues identified during public scoping that were used to develop the alternatives and design activities to carry out the action alternatives included:

- *Changes in Motorized Access* - Proposed road management activities (closure and decommissioning) would reduce public access for recreation and personal use fuelwood gathering. The proposed action would also reduce opportunities for members of the Klamath Tribes to hunt or gather Treaty Right resources within former Klamath Reservation boundaries, using motorized vehicles.
- *Economic Efficiency and Economic Opportunities* - There were concerns expressed about the overall economic return of the proposals included in the proposed action. Some commenters felt the cost effectiveness of the project could be reduced by including restoration proposals other than commercial salvage. Some people want the Forest Service to maximize economic opportunities by timely salvage of fire-killed trees. They urge the Forest Service to, “Harvest as much of the merchantable timber as quickly as possible.”
- *Effects on Soils, Watersheds, and Aquatic Habitat* - Concern was expressed that potential adverse affects as a result of salvage or other activity on watershed functioning and riparian conditions

and on soils (fertility, compaction or erosion/sediment), outweigh economic reasons for the recovery of forest products.

- *Effects on Wildlife Habitat* - The Toolbox Complex fires had a complex array of effects on wildlife habitats. Two primary habitats emerged as key issues: snags/down wood and mule deer.
- *Recovery using a limited-intervention approach vs. Recovery using a full range of active management practices, including commercial salvage* - This issue embodies divergent public input on which overall approach to recovery best accomplishes actual recovery and restoration.

4. Public Opinion of Project and of request for Determination of Emergency Situation – Responses to initial scoping were received from 15 individuals, agencies, businesses, and organizations. Comments on the DEIS were received from 18 individuals and/or organizations.

Local citizen support and regional industry support for the project, and its timely implementation is strong, as expressed by the sum of the above responses. This includes input from DR Johnson Lumber Company (December 13, 2002) which noted that “time is of the essence to salvage dead and burned dead and dying conifers, while they have merchantable value,” Crown Pacific (November 14, 2002) which stated that “salvage of fire-damaged trees should proceed as expeditiously as possible...(because) the resulting loss in value limits your ability to adequately address the likelihood of future high intensity wildfires,” and in addition, during either initial scoping or comments of the DEIS, eight responses were received from local citizens supporting the project. Other than a concern that too many non-revenue producing project elements were being included in the proposals, there was no local opposition expressed on the project. Note: “local” in its use here is referring to Lake County, Oregon.

The sum of opposition to or concern about the project, which primarily focused on commercial salvage elements, were contained in four letters from individuals and nine letters from environmental organizations, including those located in Klamath Falls, Eugene, Fossil, and Portland, Oregon, as well as Sante Fe, New Mexico, Seattle, Washington and northern California. In general, concerns about the amount of commercial salvage contained in the DEIS (14, 441 acres - well above FEIS and ROD proposals) was the strongest message received from those who opposed the project as designed. This opposition ranged between those who favored a completely non-commercial restoration effort (such as the considered-but not fully analyzed “Alternative F”) that focused in fuels reduction and other treatments involving small trees-only, to support for the fully developed alternative with the least amount of proposed commercial salvage (Alternative D, with about 6,300 acres of salvage).

No member of the public nor industry representative specifically commented in support of an emergency situation determination (though as noted above, numerous responses stressed the importance of timely salvage).

Two specific responses to the request for emergency determination were received that argued against or expressed concern about such a determination. One of these was in a letter from The Wilderness Society, received during the DEIS comment period that stated, “*We strongly urge the agency to not declare the Toolbox project as an emergency situation and thereby exempt it from the automatic stay requirements of the Appeals Reform Act. While the new appeal regulations allow....an emergency based on ‘substantial loss of economic value to the Federal Government,’ we believe that such an economic-based declaration would likely violate the Appeals Reform Act. It is difficult to image that an additional 45 to 60 days delay in implementing the project would result in the kind of emergency situation that would justify a special exemption....*” In addition, an e-mail was received several weeks following publication of the Winter SOPA (which announced the intention to request emergency situation) from The Klamath Forest Alliance, which suggested that, “*the district could drop its intent to file for an "Emergency Situation*

*Determination" and put that in writing for KFA, and both of us could save a lot of work (note: here it is referring to a pending FOIA request pertaining the Emergency Determination). It's all about trust, but the fact that the Forest Service is considering an "Emergency Situation Determination" puts KFA and all the other environmental groups on the defense."*

### **Specialist/Regional Office Involvement**

The Forest Supervisor and the District Ranger have been intimately involved with this project analysis, including development of the proposed action, Key Issue determination, development of the range of alternatives, public involvement strategies, review and editing of the DEIS and FEIS, and Regional Office coordination. A full-time Interdisciplinary Team, with 13 members representing 16 disciplines or subject areas, has functioned from September 2002 until the present (March 2004) to complete the EIS. The close working proximity between the majority of the IDT members has allowed daily discussions that have improved common understandings and facilitated problem solving.

Internal review copies of the DEIS were provided to the Regional Environmental Review Committee in early June 2003. In late June, the District Ranger and six members of the IDT, including Team Leader, Wildlife Biologist, Silviculturist, Hydrologist, Fuels Specialist, and Writer-Editor, met with Environmental Review Committee in Portland. As a follow-up to that meeting, the IDT Hydrologist and Soils Scientist met with their Regional Office counterparts in Portland in July 2003. As a result of that process, a much stronger DEIS was prepared for public distribution. Other Regional Office Natural Resources Staff have provided extensive review and technical support throughout the development of EIS. On March 1, 2004, the Forest Supervisor and District Ranger briefed the Regional Directors on the project in Portland.

### **Implementation without Emergency Situation Determination**

If the project is determined to not represent an emergency situation exempt from a stay of implementation we can expect further deterioration of the timber, making the sales less economically viable. Some units would require modification to the current plans or be eliminated completely because this loss of value would make what is implemented different than what is portrayed in Alternative G (modified). Reforestation associated with the project would also be more costly with a lower success. The ROD would be published at the end of March, beginning a 45-day appeal period. There are no other means available to accelerate implementation.

/s/ Karen Shimamoto  
KAREN SHIMAMOTO  
Forest Supervisor

cc: Carolyn Wisdom, Jack B. Sheehan, Doug Coon, Jill Dufour

Attachment

**Exhibit A**  
March 5, 2004

**Toolbox Fire Recovery Project - Derivation of Salvage Harvest Volumes and Value**

**Harvest Salvage Now Volume:**

Cruised volumes for ponderosa pine and white fir include trees 12 inches dbh and larger to a 9-inch top dib. Lodgepole pine was not included in this analysis of value, as it is no longer valuable as saw timber.

**Harvest Salvage Delayed 105 days Volume:**

Volume for trees 14 inches and less in dbh is removed. Remaining volume was then reduced 5 percent to account for additional loss expected attributable to checking, cracking and insect damage.

		<b>Volume Deductions</b>			
<b>Log DIB</b>		<b>Now</b>	<b>Trees 14" dbh and less</b>	<b>5% Additional Defect</b>	<b>Delayed</b>
<b>Ponderosa pine</b>	9 - 11.9"	6,451	-1,333	-377	4,741
	12 - 17.9"	9,048	0	-453	8,595
	18 - 23.9"	6,144	0	-307	5,837
	24+"	2,605	0	-131	2,474
<b>White fir</b>	Camp run	6,656	-1,862	-240	4,554

**Delivered log prices:**

Delivered log prices for green timber were obtained from three local mills, and are current as of February 2003. Mills report that delivered log prices for fire salvage ponderosa pine timber is typically reduced by 30 percent to 50 percent; based on condition of the logs. Mills report that delivered log price for fire salvage white fir timber is typically reduced by 20 percent; based on condition of the logs.

## Exhibit A

	Log Top Diameter	Log Price \$/ mbf	Now 60% Green Value	Delay 55% Green Value
<b>Ponderosa pine</b>	9 - 11.9"	\$237.08	\$142.25	\$130.40
	12 - 17.9"	\$392.08	\$235.25	\$215.65
	18 - 23.9"	\$462.36	\$277.42	\$254.30
	24+"	\$519.25	\$311.55	\$285.59
Weighted Average			\$229.39	\$215.39
<b>White fir</b>	Camp run	\$240.67	\$240.67	\$240.67

The USDA Forest Service Region Six Product Quality Adjustment spreadsheet for February 2004 was then used to compute the average delivered log price for ponderosa pine. White fir prices reflect 'camp run' pricing and did not require determination of an average log price.

**Appraised value:**

Appraised value of saw timber for sell now and sell 105-day delay was derived using the USDA Forest Service Region Six Transactional Evidence Appraisal Program. Average costs for appraisal zone 4 were applied and locally obtained delivered log prices used.

	Sell Now	105 Day Delay
<b>Ponderosa pine (mbf)</b>	24,248	21,648
<b>White fir (mbf)</b>	6,656	4,554
<b>Average Adjusted Base Period Price</b>	\$23.79	\$7.48
<b>Sale Costs / mbf</b>	\$202.01	\$202.38
<b>Average Predicted Bid Rate</b>	\$34.16	\$17.48

/s/ Allan D. Hahn  
 ALLAN D. HAHN  
 Timber Sale Contract Specialist  
 Fremont-Winema National Forests