Responses to Questions Asked by the House and Senate Committees on Appropriations Concerning the Biscuit Fire in Southern Oregon.

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Statement 1. What is the change in reforestation capabilities and costs between the date of the containment of the Biscuit Fire and the completion of the Biscuit Fire Recovery Project, as detailed in the Record of Decision?

Response: Reforestation capabilities are based on the availability of site-appropriate seedlings (for immediate planting), seed and nursery capability (for seedling production), agency workforce (for contract preparation and administration), independent contractors (for the actual planting), and funding levels adequate for the effort.

Immediately following the fire, in September of 2002, reforestation needs were estimated at \$33,000,000 for 65,000 acres over three years¹. These amounts and costs were based on a traditional approach of broad-scale planting with two-year old nursery-produced planting stock. This approach was very quickly modified to one of planting containerized one-year-old stock only in locations most likely to ensure long term success and return on the investment. This reduced the acreage to be planted, the space necessary at nurseries, the staffing required for the effort, and the overall costs.

This new approach was applied in the Biscuit Post-Fire Assessment (January 2003) to address the reforestation concerns listed on page 58 of the assessment:

- 1. Lack of available seedlings for the 2003 and 2004 planting seasons.
- 2. Limited seed supplies for some of the necessary breeding zones to produce those siteappropriate seedlings.
- 3. Depletion of seed lots by the Biscuit reforestation effort.
- 4. Limited funding for the reforestation need.
- 5. Risk of wasting seed stock if sown immediately, but funding not available for planting in two to four years.
- 6. The availability of contractors and agency workforce for the need identified at that time.
- 7. Impact to nurseries as they adjust to a large shift in their program of work.

Applying a business-like and cost-effective approach to address the above concerns, the Forest recommended the following priority areas for reforestation on page 59 of the assessment:

- 1. Sites that can be planted with no additional site preparation work and have reasonable access (less than one mile from road).
- 2. Matrix land allocations with reasonable access.
- 3. Plantations that were successfully reforested in the past.
- 4. Sites that need site preparation for successful regeneration (limited hardwood and brush competition).
- 5. Sites that need site preparation and also have competing hardwood species.

These criteria ultimately reduced the number of acres recommended for planting to only 31,000 acres². It is on these acres that the Forest believed it would receive the highest return on its reforestation investment (seedling survival and successful restoration).

¹ Forest Leadership Team meeting notes for September 23, 2002. This acreage did not include estimates for reforestation of any possible fire salvage areas.

² The Biscuit Post-fire Assessment, page 157. This acreage estimate did not include estimates for reforestation of any possible fire salvage areas.

The January 2003 assessment was based largely on remote sensing and professional judgments concerning acres needing planting. It did not include areas that might need planting following salvage harvest. Actual field reviews in the following years revealed higher-than-expected natural regeneration. They also revealed the need for more site preparation (mechanical or burning) and helped identify acres that would not likely have been cost effective (or successful) to plant.

This approach and the acreage refinements from actual field data was applied in reforestation assessments in the October 2003 Draft Environmental Impact Statement (DEIS), the Final Environmental Impact Statement (FEIS), and Records of Decision (RODs) of July 2004. Those proposed acreages included acres to be planted following salvage harvest (unlike the Post-Fire Assessment). These proposed acreages and costs are shown below:

Reforestation estimate in:	Total No. Acres ³	Cost ⁴
DEIS Alternative 7	50,246	\$27,530,000
FEIS alternative 7	31,161	\$16,764,600

Changes in reforestation capabilities between the DEIS and the FEIS are identified on Page C-4 and C-5 of the FEIS. They reflect deductions made as field reviews refined areas where planting was not economical, not feasible, or not needed (planted since the DEIS, or natural regeneration was sufficient, etc.). Other deductions resulted from fewer acres being proposed for salvage harvest due to riparian protections or loss of merchantability due to decay over the intervening time. The difference in acreage estimates between the Assessment and the DEIS/FEIS reflect the factors described above as well as planting completed in 2003 and 2004; and the inclusion of reforestation of fire-salvaged acres.

³ this total includes both National Forest System and Bureau of Land Management lands

⁴ Total Cost – from Biscuit Economic Analysis Final Acre Costs, September 23, 2004 by Richard Phillips, and includes costs for both National Forest System and Bureau of Land Management lands.

Statement 2. What is the commercial value lost, as well as recovered, of the fire-killed timber within the Biscuit Fire area:

Response: The commercial value lost, \$139,583,000, is calculated below as the difference between the total commercial values of \$171,796,000 (defined below) minus the \$32,213,000 of value recovered to date (defined below). Significant amounts of salvage volume and its commercial value are still available for recovery. Whatever the 'loss' might ultimately be after all salvage is complete will have been due primarily to decay and acreage corrections made by actual field data to initial remote sensing information to ensure legal compliance and economic viability of the salvage sales.

Total Commercial Value: For the purposes of this answer, the total commercial value of the "fire-killed timber within the Biscuit Fire area" is defined to be the value of the timber immediately after the fire within those acres that would have been legally available (based on National Forest Management Act, Endangered Species Act, etc. requirements) and economically viable (can be profitably logged) for salvage harvest under the selected alternative in the Records of Decision for the Biscuit Fire Recovery Project EIS.

Also included is the value of three additional salvage activities: the roadside hazard tree sales, the add-on fire-killed salvage volume to pre-existing green tree timber sales, and the sale of fire-line log decks remaining after fire suppression activities. These three salvage actions were implemented as soon as reasonably possible following tree mortality, thus the recovered value of these is assumed to equal the commercial value initially available (see table below for these values). The value of these efforts was \$9,296,000.

For the Biscuit Fire Recovery Project EIS salvage sales, however, there was a significant time lag between mortality of the trees, and recovery of their value. So, initial values of available volume must be estimated. The initial value, determined by multiplying the volume of timber available, by its value, is estimated to have been \$162,500,000 as calculated below:

Volume of Timber

The timber volume identified for harvest in the Records of Decision for the Biscuit Fire Recovery Project EIS was estimated at 368 million board feet (mmbf). This volume was based on estimates of commercial volume per acre and the number of acres legally available and profitable for timber operations (as discussed above).

Acres available

Between the original October 2003 DEIS estimate of 29,086 acres and the actual logging of the salvage sales through 2005, many factors combined to reduce the legally available and economically viable acres for timber salvage, as well as the volume available from those acres. These factors ranged from data refinements to losses from decay and are summarized in the table below.

The magnitude of the analysis area and the timeframe for EIS completion required an unavoidable initial reliance on available remote sensing data and interpretive applications. Acreage estimations from this remote sensing analysis were continually refined as actual field data became available. Differences between computer interpretations of remote imaging results immediately after the fire and actual conditions visually evident two to three years later drove the largest acreage and volume reductions. The largest such acreage reduction concerned meeting the legal requirements for management within Late Successional Reserves (LSR), and the protection of riparian corridors, archeological sites, botanical sites, and geologically unstable sites. Most of this reduction concerned Standards and Guidelines that relate to the degree and extent of forest mortality within LSRs, and thus acres legally available for salvage. Where remote imaging indicated fire-killed trees existed in amounts and acreages consistent with LSR standard and guideline requirements for salvage, field reviews very often found that it did not. Between the DEIS and the FEIS approximately 7,600 acres ultimately were dropped for this reason to meet legal requirements. More such adjustments were found during actual sale layout and implementation.

After actual field review, some acres were found to contain too few merchantable-sized trees to be economical to log. Between the DEIS and the FEIS the volume from approximately 1,400 acres were reduced by this factor.

Delays between initial tree mortality and completion of the FEIS affected the merchantable timber volume on all acres because of decay. Trees less than 20" diameter decay fast following mortality. Where acres were dominated by commercial-size small-diameter (9" to 20") trees, the decay by 2004 and 2005 eliminated most of their economic viability for logging. Approximately 1200 acres were lost to this factor between DEIS and FEIS and 1350 additional acres that were legally available for harvest were eliminated from consideration between the FEIS and actual harvest due to this factor. Decay and the resulting volume reductions continue to this day.

In summary, approximately 10,200 acres believed to have been available for commercial salvage in the DEIS Alt. 7 were no longer considered available for salvage at the time of the FEIS due to decay and field verification of remote sensing data during that intervening time.

Following release of the RODs, additional adjustments were made as more detailed field information was obtained. During sale layout and continuing even during sale operations, adjustments were made to ensure legality and economic viability. The most significant was change that related to the number of riparian areas to protect since more riparian channels became evident after the fire than were known and mapped prior to the fire.

Trees grow much larger in riparian areas, than in upland areas in the Biscuit fire area. Many upland areas are dominated more by smaller threes than by larger. Decay in these smaller trees was advanced by 2005 when these areas finally became available for harvest. There resulted then, a significant number of acres dropped where merchantable timber was no longer available in amounts to be economically viable, after protection buffers were established for riparian zones. Approximately 1,350 acres were dropped for this reason. One of the largest factors affecting the number of acres salvaged to date compared to the amount estimated in the FEIS and authorized in the Records of Decision comes from the ongoing delay of salvage logging in the Inventoried Roadless Areas due to litigation. This accounts for an 8,174 acre difference between acres authorized and acres salvaged to date.

Additionally, there was overlap between the acres identified for salvage under Alternative 7 and that already being logged in the Roadside Hazard salvage sales. Volume taken out under the hazard tree sale was obviously not available for the Biscuit Recover Project ROD salvage sales

	Original Estimates	Reductions Between DEIS and FEIS	Reductions Since FEIS	Yet to salvage	Actual sold acres to date
DEIS Estimate	29,086				
Reduced to meet					
legal requirements,		Approx 7,600			
etc.					
Decay eliminated					
economic viability		Ammory 1 200			
of acres otherwise		Approx 1,200			
available to log					
Too few					
merchantable trees		Approx 1.400			
(found after field		Appi0x 1,400			
review)					
FEIS estimate	18,935				
Reduced to meet					
legal requirements,					
overlap with					
Roadside Hazard			Approx		
salvage sales, not			5 750		
economical to			5,750		
begin with, and					
remote sensing					
field verification.					
Decay eliminated					
economic viability			Approx		
of acres otherwise			1,350		
available to log					
IRA sales not yet					
logged; awaiting				8,174	
litigation results					
Actual sold harvest					3 657
acres to date					5,057

The table below summarizes the acreage affects discussed above.

From the table above, the number of acres appropriate for calculations of initial volume from legally available and economically viable acres would be a sum of the acres dropped between the DEIS and the FEIS because of decay (1,200) plus the FEIS Alternative 7 decision (18,935) minus the acres "Reduced to meet legal requirements, overlap with Roadside Hazard salvage sales, not economical to begin with, and remote sensing field verification" (5,750) for a total of 14,385 acres.

Volume per acre

Actual harvest from the Biscuit Fire Recovery Project acres to date (Matrix and LSR only) is approximately 13.1 mbf per acre. This compares with the estimate of 14mbf/acre in the Proposed Action, Alternative 2, which proposed salvage only in Matrix lands. It is a reduction from the 19.4 mbf/acre estimate for Alternative 7 which proposed salvage in Matrix, LSR, and Inventoried Roadless Areas (IRAs) yet accounts for the effect of not yet harvesting in IRAs and the fact that more riparian areas (with their higher volumes per acre) needed protection than originally estimated. The differences in original estimates between alternatives can be attributable to the differing tree sizes within these land areas. Trees in IRAs and LSRs tend to be larger than those in previously-managed Matrix lands. All of these figures, however, were reduced to account for the decay which occurred between mortality and projected year of harvest.

To estimate likely volumes per acre immediately after the fire, it is necessary to include the deductions made for decay back into the actual values from harvest. The Biscuit sales were logged in 2005, the third year out from actual mortality. Data from actual scaled timber sales show clearly that 42% of the volume per acre has been lost since late 2002. This equates to a likely average volume of 22.6 (13.1 is 58 percent of 22.6) mbf per acre. This may be somewhat conservative, since it is based on actual harvest results from only Matrix and LSR lands, and does not include harvest from Inventoried Roadless areas which are known to have larger volumes per acre. The FEIS estimated an initial 26 mbf per acre declining to 14 mbf per acre by 2004 (FEIS page III-383).

Volume of Timber conclusion

Using a volume of approximately 22.6 mbf per acre on a legally available and economically viable land base of 14,385 acres yields a potential harvest of 325 mmbf had delay not been a factor. The original volume estimate in Alternative 7 of the FEIS was for 368 mmbf based on salvaging 18,935 acres with 19.4 mmbf per acre available in 2004 (after decay).

Value of Timber

"Timber value is based on saw log pond values in Southwest Oregon obtained from the Oregon Department of Forestry website (<u>www.odf.state.or.us</u>). Pond values are what a mill pays for a log delivered to the mill location. Pond values for Douglas-fir have ranged between \$500 and \$650 per mbf over the last five years with an average of about \$550." "...the pond value used in this analysis is set at \$500 per mbf" (EIS III-401).

This pond value of \$500 per mbf, times the volume of 325 mmbf that would have been available (as defined above) yields a total value for the Biscuit Fire Recovery Project of \$162,500,000 (325 mmbf multiplied by \$500 per mbf).

The **total commercial value** is thus the estimated pond value of the timber immediately after the fire within those acres available for harvest from the Records of Decision for the Biscuit Fire Recovery Project EIS (\$162,500,000) plus the pond value of the other three salvage activities described below (\$9,296,000) for a total of \$171,796,000.

Commercial value recovered: This is defined as the pond value for all timber volume sold from all Biscuit salvage efforts plus the estimated pond value of the sold volume remaining to be removed. These include:

Project type	Value recovered
Roadside hazard tree sales	\$7,346,000
Fireline decks	\$270,000
Add-on fire salvage to previously sold sales (est.)	\$1,680,000
Biscuit Recovery EIS salvage sales	
Matrix Salvage Sales	\$6,310,500
LSR Salvage Sales	\$15,547,500
Sold but unlogged volume	\$1,059,000
total	\$32,213,000

Commercial Value Lost

The total commercial value of \$171,796,000 minus the total commercial value recovered of \$32,213,000 leaves \$139,583,000 as the commercial value lost.

Statement 3. What are all the actions included in the Records of Decision for the Biscuit Fire Recovery Project, but forgone because of delay or funding shortfall?

Response: Actions in the Biscuit Recovery Project Records of Decision (RODs) fall under four generalized categories:

- 1. Fuels Treatments & Habitat Restoration
- 2. Salvage of Dead Trees
- 3. Vegetation and Habitat Restoration
- 4. Roads and Water Quality

There is also a Landscape Scale Learning Study authorized in the LSR ROD.

Funding for many of these treatments, originally envisioned as coming from KV receipts, must now come from appropriated dollars since receipts from the timber sales are less than anticipated due to delay in harvest.

Delay has affected the <u>Salvage of Dead Trees</u>. Delay, for the purpose of this response, is defined as time lag between control of the Biscuit fire (fall of 2002), and the time when the first logs were taken from the Biscuit Fire Recovery Project salvage sales (late summer of 2004).

Private land owners within the Biscuit fire perimeter were taking fire-killed logs off their lands as early as the fall of 2002. Nearly two years later, the first sales authorized under the Biscuit RODs were salvaged⁵.

This delay was due to the legally required timeframes for NEPA public review and comment periods. The NEPA process timelines and the lawsuits that followed were the primary factors in loss of merchantable material and return to the taxpayers.

Funding shortfall has affected all other categories.

The <u>Fuel Treatments and Habitat Restoration</u> (the creation of fuels management zones through vegetation removal and burning) could have been implemented had funding been available to do so. The Biscuit Fuel Management Zones (FMZs) are not in high priority wildland urban interface (WUI) and have not been prioritized nor selected for treatment under routine program of work decisions. These FMZs are not only 'non-WUI', they are also currently at lower fire risk because of the recent Biscuit burn. Funding specifically identified for Biscuit FMZs would be necessary to implement these projects in the short term. In the longer term, they will rise appropriately in the funding priorities.

While planting, which is funded primarily from KV collections (in salvage sale areas), and appropriated dollars (for non-salvage sale areas), is not affected, other projects and treatments identified under the <u>Vegetation and Habitat Restoration</u> category that originally planned to use KV funding have been delayed for lack of sufficient KV and appropriated funding. The ability to fund much of the envisioned restoration was to have come from revenue generated from the salvage

⁵ The U.S. Forest Service sale and logging of the fireline decks (authorized using Categorical Exclusions) occurred in late 2002. The EIS sales were not available until late 2004.

timber sales. Delay reduced the volume, and thus available KV receipts. Though delayed, and significantly reduced, they are not entirely forgone.

Where not associated with salvage sales, and thus not available for KV funding, road decommissioning and maintenance for water quality improvements have also been delayed and significantly reduced for lack of funding. However, none have yet been completely forgone; the work still needs to be done.

Statement 4: The Forest Service original estimate of the acres that should be reforested and the cost in dollars per acre, including planting stock and overhead and a summary of the original schedule to do the work.

Response: Original estimate of reforestation needs were identified in the Biscuit Post Fire Assessment, January 2003. On pages 57 thru 63 is a discussion of the reforestation activities that could be done in the Fire area. Part of it states: "Approximately 67,300 acres of conifer stands were deforested by the fire (greater than 75% canopy mortality). These areas are classified as Capable and Available lands and include Management Areas 4 through 14 (MAs 4 through 14). About 37,000 of these acres should respond well to planting, (areas without excessive rocks, unstable soils, or low productivity soils)." (The 67,300 acres and the 37,000 acres above should not be confused with the 65,000 and 31,000 acres described in Statement 1, page 2. The similarity in these numbers is coincidental; they are different acres.)

No cost was given in the Assessment. The cost of \$538 per acre, however, can be used for estimation, since this is the cost for the calculations in Alternative 7 of the EIS, which includes planting stock, contract costs, contract administration, overhead, and site preparation. This results in a total planting cost of \$19,906,000 (37,000 acres @ \$538 per acre = \$19,906,000).

No actual "schedule" was prepared to accomplish these acres. However, below is a reasonable professional estimate of what a schedule may have looked like.

Planting Year	Reasonable estimate of	Actually Planted
	schedule envisioned in 2003	
2003	200	691
2004	4800	4658
2005	5000	4112
2006	10,000	
2007	10,000	
2008	5000	
2009	2000	

2003 – Planting of burnt plantations; seedlings available for purchase from neighboring landowners.

2004 – Planting burnt plantations that did not need site preparation

2005 – Planting burnt plantations that needed site preparation, salvage sale areas, and some of the "other" planting areas (landscape planting, and planting in landscape burn areas).

2006 – Plant salvage sale areas and "other" planting areas

2007 – Plant salvage sale areas and "other" planting areas

2008 – Plant salvage sale areas and "other" planting areas

2009 – Plant salvage sale areas and "other" planting areas

Statement 5: Provide a summary of the initial Forest Service plan to salvage timber; including a discussion of the acres which would have been harvested and the estimated volume and value of that salvage, as well as the cost to the Federal government to develop and administer the sale and the anticipated cost to the purchasers.

Response: The initial Forest Service plan to salvage timber was labeled as the Proposed Action in the Notice of Intent to Prepare an EIS published in the Federal Register March 19, 2003 and then submitted to the public for their initial review during scoping for the draft EIS at that same time. It is described in general terms on pages 1-6 through 1-10 of the Draft Environmental Impact Statement (DEIS) for the Biscuit Fire Recovery Project. This proposal was carried forward in the DEIS as Alternative Two and described in detail beginning on page 11-14.

In the Final Environmental Impact Statement (FEIS), this alternative was refined using additional field data gained after the additional year of field work. The FEIS estimates, therefore, more accurately reflected actual conditions for the original proposal. See detailed discussions of these changes in Statement 2. The table below compares the descriptions of the initial Forest Service plan to salvage timber as described in Alternative 2 in the DEIS and FEIS.

Alternative 2 – Proposed Action	DEIS	FEIS
Acres to be harvested	5,169	3,953 ⁶
Estimated volume	96.7 mmbf	56.6 mmbf ⁷
Total value (return to agency)	\$20.4 million ⁸	\$12.2 million ⁷
Cost to develop and administer (USFS)	\$3.75 million ⁸	\$2.3 million ⁹
Cost to purchasers (logging cost)	\$17.8 million ⁸	\$13.7 million ⁹

Acres to be harvested were approximately 3,953 acres outside of Late Successional Reserves (LSRs) and Inventoried Roadless Areas (IRAs). Salvage in LSRs was limited to that necessary for construction of Fuels Management Zones (FMZs).

Estimated volume was 42.6 mmbf from matrix salvage sales with an additional 14 mmbf from construction of FMZs, some of which would come from LSRs.

⁶ FEIS page II-16

⁷ FEIS Table III-168, the "value" here is different from the "value" discussed in Statement 2. The numbers here represent receipts to the government which is generally the pond value (the value discussed in Statement 2) minus the logging, hauling, profit, and other costs.

⁸ DEIS Table III-123. This table is incorrectly numbered but can be found just before table III-168

⁹ FEIS Table III-123. This table is incorrectly numbered but can be found just before table III-168

Statement 6: Provide a similar summary for the final Forest Service salvage plan.

Response: The final Forest Service plan to salvage timber is that which was labeled as Alternative 7 in the Final Environmental Impact Statement. Statement 5 described the initial Forest Service plan, Alternative 2. The Table below describes Alternative 7. The differences lie primarily in the inclusion of LSRs and IRAs in Alternative 7.

Alternative 7	FEIS
Acres to be harvested	$18,935 \text{ acres}^{10}$
Estimated volume	368 mmbf ¹⁰
Value (return to agency)	\$13 million ¹¹
Cost to develop and administer (USFS)	\$11.5 million ¹²
Cost to purchasers (logging cost)	\$112.6 million ¹²

Acres to be harvested: approximately 18,935 acres were proposed for salvage harvest from Matrix, LSRs and Inventoried Roadless Areas (IRAs).

Estimated volume: An estimated volume of 368 mmbf was proposed.

Statement 7: A presentation and list of the timber sales offered and planned including the volume, and appraised value. The presentation should indicate sales offered but not sold, and sales not yet underway. It should also separate out sales by land management regime.

Response:

Timber Sales Offered

All timber sales offered (fireline decks, roadside hazard, and Biscuit EIS salvage sales) were successfully auctioned and awarded. All but two of the sales have been completed. Both of those remaining two are underway, though currently shut down for wet weather. The following table presents the list of timber sales offered to date:

¹⁰ FEIS page II-35 ¹¹ FEIS Table 111-168

¹² FEIS Table 111-123. This table is incorrectly numbered but can be found just before table III-168

Timber Sale	Advertised mbf	Advertised value ¹³	Actual mbf	Actual Receipts ¹³
Hazard Tree Salvage Sales				
Rasp Hazard	2,032	\$685,108	2,565	\$1,034,814
Indigo Hazard	896	\$206,393	1,798	\$744,230
Qcamp Blowdown	6	\$1,978	11	\$4,345
River Six	737	\$30,908	1,851	\$328,722
Baby Onion	1,335	\$143,484	1,517	\$393,988
Bald Bear	772	\$66,396	3,251	\$360,824
GameHorse	1,782	\$525,931	3,105	\$1,317,191
Chetco Hazard	266	\$30,809	594	\$120,158
subtotal	7,826	\$1,691,007.00	14,692 ¹⁴	\$4,304,272.00
Fireline Log deck sales				
North Deck	149	\$37,369	148	\$104,463
South Deck	126	\$30,504	126	\$46,670
Chetco Deck	7	\$2,246	7	\$7,868
North End Decks	121	\$12,952	167	\$33,660
Buckskin Decks II	35	\$9,904	47	\$10,019
Dasher Decks II	49	\$9,835	46	\$12,003
subtotal	487	\$102,810.00	541	\$214,683.00
Matrix ROD salvage sales				
Briggs Cedar Sale	2,341	\$99,493	1,823	\$266,458
Chetco Salvage Sale	289	\$27,221	217	\$4,566
Flattop Fire Salvage	6,622	\$285,474	3,537	\$148,741
Horse Salvage Sale	2,415	\$47,769	2,800	\$101,628
Indi Timber sale	6,305	\$681,066	4,244	\$909,236
subtotal	17,972	\$1,141,023.00	12,621	\$1,430,629.00
LSR ROD salvage sales				
Berry Timber Sale	12,834	\$546,857	9,923	\$99,671
Fiddler Fire Salvage	14,482	\$1,060,807	10,613	\$524,322
Hobson Fire Salvage	7,319	\$112,786	3,810	\$29,950
Lazy Fire Salvage	5,581	\$78,190	875	\$10,394
McGuire TS	2,104	\$83,760	866	\$34,837
Steed Timber Sale	6,074	\$241,138	4,572	\$56,328
Wafer TS	688	\$11,235	436	\$4,356
subtotal	49,082	\$2,134,773.00	31,095	\$759,858.00
TOTAL	75,367	5,069,613 ¹³	58,949	\$6,709,492 ¹³

¹³ The value here is different from the "value" discussed in Statement 2. The numbers here represent receipts to the government which is generally the pond value (the value discussed in Statement 2) minus the logging, hauling, and other costs.

other costs. ¹⁴ This figure is significantly higher than the advertised volume because much additional mortality occurred in the time between award of the Hazard Tree Sales and completion of operations. Since this additional mortality along roadsides constituted a safety hazard, the volume was added to already-awarded sales.

Timber Sales Planned

A set of timber sales was authorized under the Record of Decision for the Biscuit Fire Recovery Project for salvage and planting in Inventoried Roadless Areas (IRAs). Though planned, authorized under the ROD, and successfully defended in court (to date), none of these sales have yet been offered for sale due to ongoing litigation.

Timber Sale	Estimated FY04 vol (mbf)	Advertised value	Actual Receipts	Estimated FY06 vol (mbf) ¹⁵
IRA ROD Salvage Sales				
Saddle	29,000	N/A	N/A	21,000
Blackberry	20,000	N/A	N/A	16,000
Mikes Gulch	12,400	N/A	N/A	8,700
Snailback	22,000	N/A	N/A	15,000
Mike's Gulch #2	5,700	N/A	N/A	3,800
TOTAL	89,100	N/A	N/A	64,500

¹⁵ Actual volume will likely differ due to reasons described in Statement 2. This does not include all acres authorized in the Biscuit IRA ROD, but at this point in time are the most commercially viable.