

**Minnesota Department of Natural Resources
Division of Forestry
M.S. 16A.125, Subd 5. Certification Report
Forest Suspense Account 2016**

REVENUES	School Susp. Fund: 3800	Univ. Susp. Fund: 6000	Trust Total
[A] Revenues Forestry Qualifying	\$ 11,794,934	\$ 73,632	\$ 11,868,566
[B] Revenues Non-Qualifying	\$ 317,026	\$ -	\$ 317,026
[C] Total Revenues	\$ 12,111,960	\$ 73,632	\$ 12,185,592
APPROPRIATIONS, EXPENDITURES, AND REIMBURSEMENTS			
Non-Forestry Direct Appropriations Out of Forest Suspense Account			
DNR Lands and Minerals			
Minn. Laws 15.SP1, Ch. 04, Art. 03, Sec. 02	\$ (200,000)	\$ -	\$ (200,000)
Dept. of Admin Trust Director			
Minn. Laws. 15.SP1, Ch. 04, Art. 03, Sec. 09	\$ (300,000)	\$ -	\$ (300,000)
[D] Total Non-Forestry Direct Appropriations	\$ (500,000)	\$ -	\$ (500,000)
Total Revenues Minus Direct Appropriations	\$ 11,611,960	\$ 73,632	\$ 11,685,592
Expenses - Forestry Qualifying			
[E] Management	\$ (5,974,831)	\$ (46,240)	\$ (6,021,071)
[F] Improvement	\$ (867,369)	\$ (6,713)	\$ (874,082)
[G] Forest Roads	\$ (137,046)	\$ (1,061)	\$ (138,107)
[H] Administration	\$ (1,257,065)	\$ (9,729)	\$ (1,266,794)
[J] Forestry Certified Costs	\$ (8,236,311)	\$ (63,743)	\$ (8,300,054)
Non-Forestry Reimbursements to General Fund			
Dept. of Admin Trust Director			
Minn. Stats. 15, Ch. 16A.125, Subd. 5(d)(2)	\$ (178,499)	\$ -	\$ (178,499)
Permanent School Fund Commission (PSFC)			
Minn. Stats. 15, Ch. 16A.125, Subd. 5(d)(2)	\$ (10,348)	\$ -	\$ (10,348)
[K] Total Non-Forestry Reimbursements	\$ (188,847)	\$ -	\$ (188,847)
NET INCOME			
[L] Forestry Net to Trust Funds ⁽¹⁾	\$ 3,558,623	\$ 9,889	\$ 3,568,512
[M] Net to Permanent Trust Funds ⁽²⁾	\$ 3,186,802	\$ 9,889	\$ 3,196,691
Transfers to Other Funds Per M.S. 16A.125, Subd. 5(d)			
Transfer to the Forest Management Investment Account			
M.S. 16A.125, Subd. 5(d)(1) Transfer ⁽³⁾	\$ (6,979,246)	\$ (54,014)	\$ (7,033,260)
Transfer to the State General Fund			
M.S. 16A.125, Subd. 5(d)(2) Transfer ⁽⁴⁾	\$ (188,847)	\$ -	\$ (188,847)
Transfer to the State General Fund			
M.S. 16A.125, Subd. 5(d)(3) Transfer ⁽⁵⁾	\$ (1,257,065)	\$ (9,729)	\$ (1,266,794)
Total M.S. 16A.125 Transfers to Other Funds	\$ (8,425,158)	\$ (63,743)	\$ (8,488,901)

Notes

- ⁽¹⁾ Forestry qualifying revenues [line A] minus forestry certified costs [line J]
⁽²⁾ M.S. 16A.125, Subd. 5(d)(4) Transfers to the Permanent Trust Funds
⁽³⁾ Sum of certified forest management [line E], improvement [line F], and forest roads [line G] costs.
⁽⁴⁾ Sum of Dept. of Admin, Trust Director and PSFC cost reimbursements as shown on line K.
⁽⁵⁾ Forestry qualifying administration costs as shown on line H.
Totals may not add due to rounding to the nearest dollar.

Submitted By:

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2016

Minnesota Department Of Natural Resources, Division of Forestry

M.S. 16A.125 Transfer Certification Report

This report identifies forestry revenues attributable to trust lands and the forestry operating expenditures certified against trust lands. Department of Administration trust director expenditures drawn from the State Forest Suspense Account within the Permanent School Fund are included to account for how Forest Suspense Account revenues from state managed trust lands are distributed.



December 6, 2016

M.S. 16A.125 Transfer Certification Report

Cost of Preparation

Name of Legislative Report: Transfer Certification Report

Minnesota Statute Reference: M.S 16A.125, Subd. 5(d)

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Description of Cost	Further explanation if necessary	Amount
Staff time (salary & fringe)	190 hours @ \$50/hour	9,500
Duplication	nominal	
Other	nominal	
TOTAL TO PREPARE REPORT		\$9,500

Statutory Provisions

Minnesota Statute 16A.125, Subd. 5 specifies which types of forestry costs are certified against trust fund lands and how the certified costs and net income from trust fund lands are distributed. Only those costs paid from the General Fund and Forest Management Investment Account that fund state land forest management (SLFM) are included in the cost certification. Costs charged to dedicated funds, federal funds, and capital budgets are excluded from the cost certification process. In addition, only revenues derived from Forestry funded activities are included in the process. Non-forestry revenues, such as mineral royalties, forest campground receipts, and lake shore leases are excluded. Minnesota Laws of 2012, Chapter 249, Section 3, Subd.5c amended 16A.125 to remove protection from certifiable costs effective July 1, 2013.

EXECUTIVE SUMMARY

Minnesota Department of Natural Resources, Division of Forestry (DNR-Forestry) is responsible for forest resource management on about 2.5 million surface acres of School and University Trust lands in Minnesota of which 2.37 million acres are subject to cost certification under Minnesota Statute 16A.125. In fiscal year (FY) 2016, qualifying revenue from DNR-Forestry managed trust lands totaled \$11.869 million, a decrease of \$0.578 million or 4.6 percent compared to FY2015 (Table 1). FY 2016 net qualifying forestry expenditures for DNR-Forestry managed trust lands totaled \$8.300 million, an increase of \$77,619 or 0.9 percent compared to FY 2015. FY 2016 total volume scaled (harvested) from Trust lands was 352,316 cord equivalents, a decrease of 65,798 cord equivalents or 15.7 percent compared to FY 2015. In FY 2016, the average value of wood scaled (harvested) was \$28.43 per cord, an increase of \$3.57 per cord or 14.4 percent compared to FY 2015.

Table 1: FY 2016 Summary Minn. Stat. 16A.125 Forest Suspense Account Financial Results.

FORESTRY REVENUES	FY15	FY16	Change	Change%
Timber Sales	\$11,249,712	\$10,808,246	(\$441,466)	-3.9%
TS Interest & Penalty	\$5,231	\$3,975	(\$1,256)	-24.0%
Res Mgmt Access/Other	\$1,062	\$1,286	\$224	21.1%
Land Use	\$1,190,740	\$1,055,058	(\$135,682)	-11.4%
Revenues	\$12,446,745	\$11,868,566	(\$578,179)	-4.6%
FORESTRY EXPENSES				
Management				
sub-Timber Sales	\$4,469,374	\$4,529,260	\$59,886	1.3%
sub-Mgmt Support	\$1,428,632	\$1,491,811	\$63,179	4.4%
Improvement	\$845,495	\$874,082	\$28,587	3.4%
Forest Roads	\$109,078	\$138,107	\$29,029	26.6%
Administration	\$1,369,857	\$1,266,794	(\$103,063)	-7.5%
Expenses	\$8,222,435	\$8,300,054	\$77,619	0.9%
Forestry Operating Income	\$4,224,310	\$3,568,512	(\$655,798)	-15.5%
Forestry Operating Margin	33.9%	30.1%	na	-3.9%
TIMBER VOLUMES & PRICES				
Volume SOLD (cords)	455,467	432,798	(22,669)	-5.0%
Average SOLD Price (per cord)	\$29.81	\$30.86	\$1.05	3.5%
Volume SCALED (cords)	418,114	352,316	(65,798)	-15.7%
Average SCALED Price (per cord)	\$24.86	\$28.43	\$3.57	14.4%

M.S. 16A.125 Transfer Certification Report

As required by 2016 Minn. Stat. 16A.125, Subd. 5(d), this report certifies DNR-Forestry cost recovery and the transfer of funds from the Forest Suspense Account to the Forest Management Investment Account (FMIA) of \$7,033,260 for management, improvement and road expenditures, and to the General Fund of \$1,266,794 for DNR-Forestry administration costs. Net income from forestry operations was \$3,569 million (FY2015, \$4.224 million), representing a 30.1 percent forestry operating margin (FY2015, 33.9 percent) for the combined school and university trusts.

After adjusting for non-forestry Forest Suspense Account revenues, direct appropriations, and Department of Administration General Fund reimbursements, \$3,196,691 was transferred to the trust funds with \$3,186,802 to the Permanent School Fund and \$9,889 to the University Trust.

Gross-Net Trends

In FY 2016, qualifying forestry revenues from combined trust lands decreased by \$578,179 or 4.6 percent year-over-year. FY 2016 qualifying forestry expenditures increased by \$77,619 or 0.9 percent. Forestry net income to the combined permanent school and university trust funds decreased by \$661,011 or 15.6 percent year-over-year to \$3.569 million. For the school trust, forestry net income decreased by \$571,452 or 13.8 percent to \$3.559 million year-over-year (Figure 1).

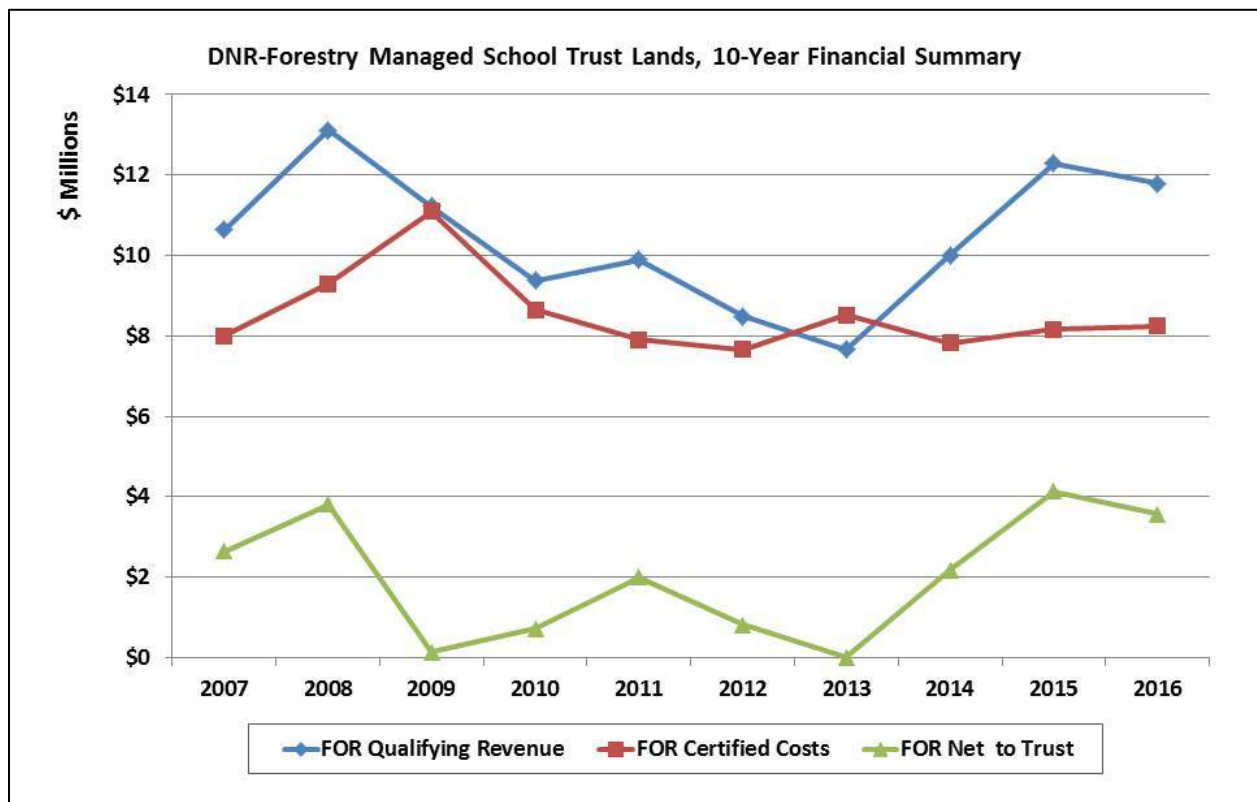


Figure 1: 10-Year Financial Summary for DNR-Forestry Managed School Trust Lands.

I. QUALIFYING REVENUES AND EXPENDITURES

This cost certification report provides details on forestry revenue and forest management costs for trust fund lands in fiscal year FY 2016. Effective July 1, 2013, two key changes were made to Minn. Stat. 16A.125: (i) fire protection was removed from qualifying activities and (ii) language was added requiring "...an analysis that compares costs certified under this section [Subd. 5] with costs incurred on other public and private lands with similar land assets." The cost certification is organized by four statutory categories: Management, Improvement, Roads, and Administration.

Qualifying Revenues

Qualifying forestry revenues are trust land revenues generated by expenditures from the General Fund and the FMIA for state land forest management (SLFM) activities. In FY 2016, revenues collected from SLFM activities spread across all state administered lands (Acquired Forestry, Acquired Wildlife, Consolidated Conservation, School Trust, University Trust, etc.) totaled \$23,062,050, a decrease of \$651,160 or 3.7 percent compared to FY 2015. Qualifying forestry revenues of \$11,868,566 were realized from trust lands, a decrease of \$578,179 or 4.6 percent year-over-year.

Qualifying Expenditures

DNR-Forestry identifies base operating expenditures using a set of cost code strings limited by fund, appropriation, and activity. The accounting strings identify qualifying and non-qualifying expenditures by activity (e.g. timber sale preparation and design, forest inventory, forest roads, private forest management, etc.) that generate the expenditure. The qualifying SLFM activities are grouped into the four (4) statutory cost categories: management, improvement, roads, and administration. In addition, general operations expenditures (fleet, facilities, information technology, and time off) are grouped as a separate category to be prorated across direct cost categories. General operations expenditures are allocated between qualifying and non-qualifying activities. Then, the qualifying portion of general operations is prorated to each statutory cost category based on the percentage of direct qualifying expenditure in each statutory category (management, improvement, roads, and administration). Qualifying expenditures are limited to SLFM activities that directly generate forestry related revenue and the activities that support forestry related revenue. Activities such as urban forestry, forest recreation, and cooperative private land forest management are excluded from the process.

For FY2016, net Minn. Stat. 16A.125 net forestry expenditures for SLFM totaled \$19,740,154 for all acres subject to cost certification. Qualifying forestry expenditures for trust lands were \$8,300,054, an increase of \$77,619 or 0.9 percent as compared FY 2015. Trust expenditures for management and improvement are prorated between Trust and non-trust acres on a percentage of total acres basis. Some 2.37 million acres (45.2 percent) of the total 5.3 million state

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administered acres subject to forest management is trust fund lands.¹ The Trust portion is allocated on a per acre basis between school and university. Some \$8,300,054 of the total net SLFM expenditure was allocated to the Trust as follows: \$8,236,311 School Trust and \$63,743 University Trust.

Management (\$6,021,071)—Expenditures are divided into two sub-categories; timber sales and forest resource management. Timber activities consist of timber sales preparation, permit supervision, scaling, and timber enforcement. Forest management expenditures, the cost of maintaining forests for future revenue, include: policy development, management planning, harvest scheduling, and forest inventory. Management costs are prorated based on the percentage of trust acres to total acres subject to certification. On a statewide basis, the trust allocation is 45.2 percent of the total \$13,327,134 qualifying expenditures.

Forest Improvement (\$874,082)—Activities include site preparation and reforestation, regeneration surveys, and timber stand improvement (TSI) activities that establish and improve forests for future revenue. Improvement costs are prorated based on the percentage of trust acres to total acres subject to certification. On a statewide basis, the trust allocation is 45.2 percent of the total \$1,934,705 qualifying expenditures.

Forest Roads (\$138,107)—State forest roads provide direct access to a relatively small portion of trust lands. Road costs are allocated to the trust based on the number of acres within one-half mile of designated state forest system roads. On a statewide basis, this amounts to 9.4 percent of total acres managed and 9.4 percent of the total \$1,465,478 qualifying expenditures.

Administration (\$1,266,794)—Department services provided to the Division of Forestry and Division of Forestry activities include: leadership services, human resources, accounting, general office & clerical, and other direct and necessary costs related to the support of staff that generates revenue. Administrative costs are allocated based on the ratio of trust land expenditures to net qualifying expenditures for: management, improvement, and roads including general operations allocations. On a statewide basis, the trust proration was 42.1 percent of the total \$3,012,837 qualifying expenditure.

¹ DNR administered acres total approximately 5.5 million. Primary land uses: cultivation, extractive, recreation, and urban development were removed to derive acres subject to forest management.

DISTRIBUTION OF SCHOOL TRUST REVENUE

Forest products revenues and certain land use revenues generated from trust lands are deposited directly in the State Forest Suspense Account within the Permanent School Fund. In FY 2016, non-forestry direct appropriations were transferred out of the Forest Suspense Account to the Department of Administration-School Trust Director (\$300,000 or 2.5 percent) and DNR-Lands and Minerals Division (\$200,000 or 1.6 percent) (Figure 2). Per Minn. Stat. 16A.125, Subd. 5(d), in the order listed, certified forestry costs for management, improvement and roads were transferred to the FMIA (\$6,979, 246 or 57.6 percent). Certain expenses incurred by the Department of Administration-Trust Director and the Permanent School Fund Commission (PSFC) were reimbursed out of the Forest Suspense Account to the General Fund (\$188,847 or 1.6 percent). Certified forestry costs for forestry administration were transferred to the General Fund (\$1,257,065 or 10.4 percent). The net balance was transferred to the Permanent School Fund Investment Account (\$3,186,802 or 26.3 percent).

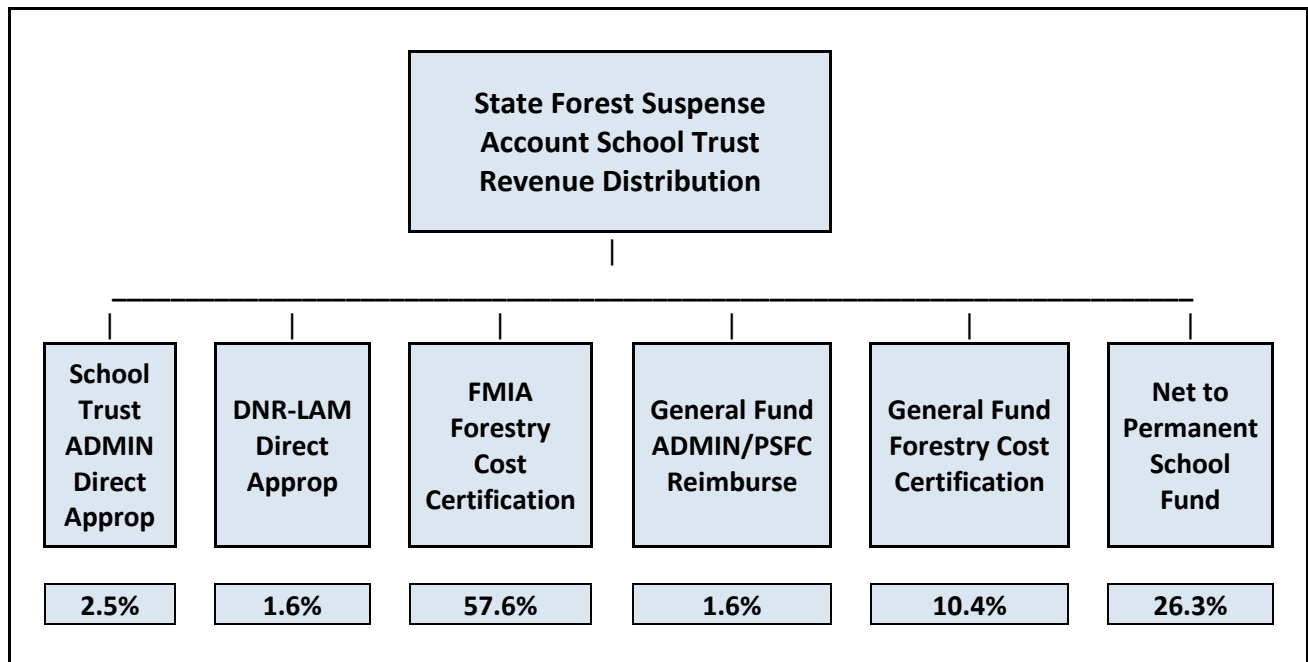


Figure 2: State Forest Suspense Account School Trust Revenue Distribution (qualifying and non-qualifying).

FORESTRY TRUST COST CERTIFICATION HISTORY

In FY 2016, forestry revenue totaled \$23.062 million. Of the total, \$11.869 million qualified for forestry trust cost certification of \$8.300 million with forestry net to the trust funds of \$3.569 million (Table 2a). After adjusting for non-forestry related revenues, non-forestry direct appropriations, and non-forestry reimbursements, net to the trust funds was \$3.197 million (Table 2b).

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Table 2a: Forest Suspense Account History (School and University)

(amounts in thousands)	FY12	FY13	FY14	FY15	FY16	5-Yr Avg
Total Forestry Revenue	\$17,114	\$15,931	\$19,809	\$23,713	\$23,062	\$19,926
Forestry Trust Revenue	\$8,577	\$7,792	\$10,140	\$12,447	\$11,869	\$10,165
Cost Transfer to GF	(\$2,793)	(\$3,551)	(\$1,278)	(\$1,370)	(\$1,267)	(\$2,052)
Cost Transfer to FMIA	(\$4,931)	(\$4,178)	(\$6,607)	(\$6,853)	(\$7,033)	(\$5,920)
Sum Cert. Cost Transfers	(\$7,723)	(\$7,729)	(\$7,885)	(\$8,222)	(\$8,300)	(\$7,972)
Forestry Net to Trust	\$854	\$64	\$2,254	\$4,224	\$3,569	\$2,193
Non-Forestry Revenues	\$232	\$290	\$224	\$205	\$317	\$254
Non-Forestry Direct Appropriations						
DNR LAM	(\$200)	(\$200)	(\$200)	(\$200)	(\$200)	(\$200)
ADMIN					(\$300)	n/a
Non-Forestry Reimbursements						
ADMIN General Fund					(\$178)	n/a
PSFC General Fund				(\$4)	(\$10)	
Net to Trust	\$886	\$154	\$2,278	\$4,226	\$3,197	\$2,148

Table 2b: Forestry Certified Costs History (School and University).

(amounts in thousands)	FY12	FY13*	FY14	FY15	FY16	5-Yr Avg
Protection	\$1,518	\$2,344	\$0	\$0	\$0	n/a
Forest Management	\$4,242	\$3,828	\$5,404	\$5,898	\$6,021	\$5,079
Forest Improvement	\$664	\$789	\$1,136	\$845	\$874	\$862
Forest Roads	\$24	\$26	\$67	\$109	\$138	\$73
Administration	\$1,275	\$1,603	\$1,278	\$1,370	\$1,267	\$1,359
Total	\$7,723	\$8,590	\$7,885	\$8,222	\$8,300	\$8,144

*Actual transfer was \$7,728,916 due to cost certification exceeding qualifying revenue.

Explanation of Table 3b Color-codes

M.S.16A.125, Subd 5(d)

- Forest Management, Forest Improvement and Forest Road Costs are transferred to FMIA.
- Effective FY 2014, Protection costs are non-qualifying.

II. DNR-FORESTRY TIMBER PROGRAM HISTORY

In FY 2016, DNR-Forestry sold 883,000 cord equivalents, and harvested 760,000 cord equivalents of all species, products, and units of measure. For the period fy 2007-2016, sold volumes ranged from 769,000 cords (FY 2013) to 1,156,000 cords (FY 2008) and harvest volumes ranged from 642,000 (FY 2007) to 887,000 (FY 2015) (Figure 3).

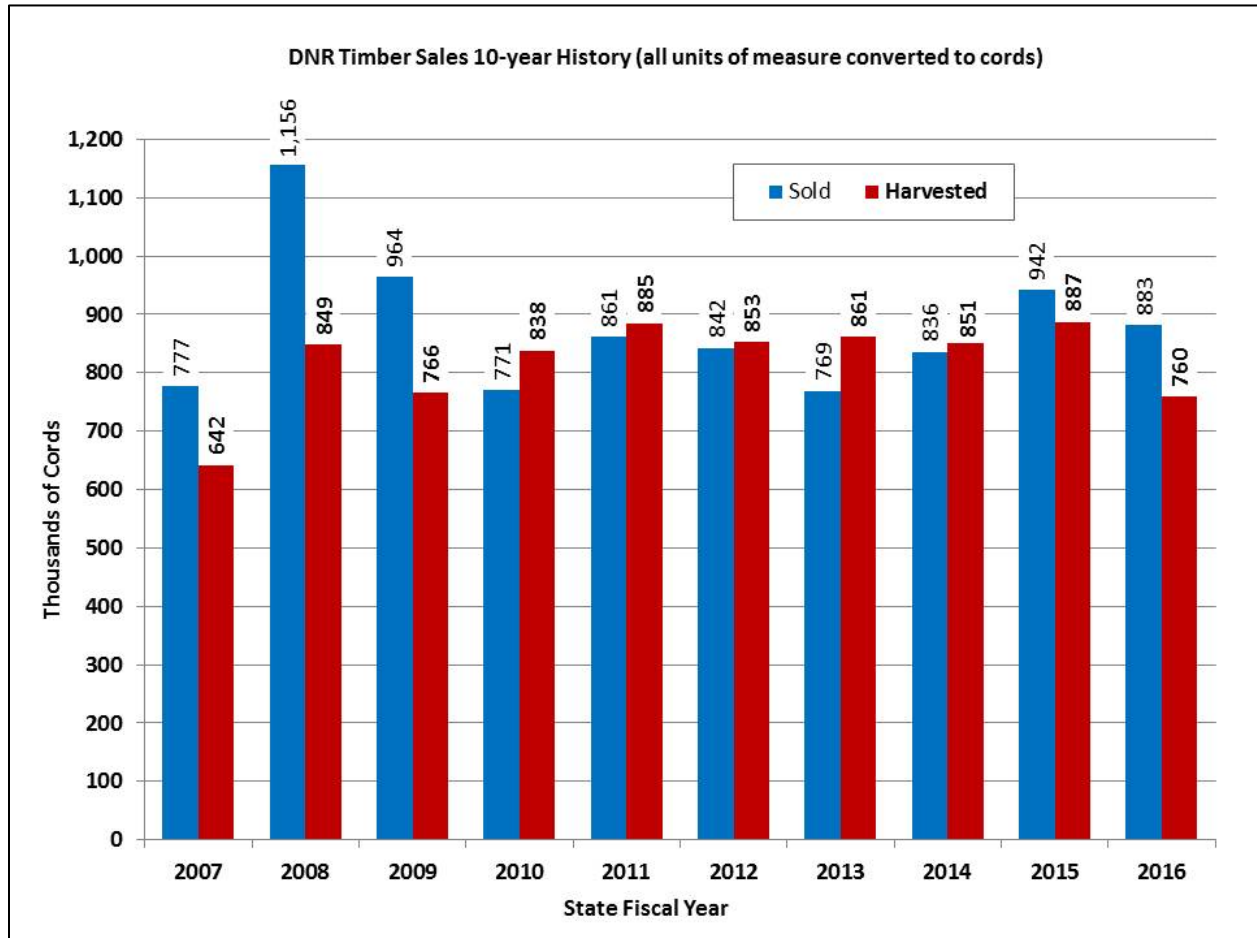


Figure 3. DNR-Forestry 10-Year Timber Sales History, Volumes Sold and Harvested.

The large increase in volume sold in FY 2008-09 was due to the re-offering of sales forfeited in 2007. The 887,000 cord harvest in FY 2015 was a modern era record harvest level from state lands. FY 2016 harvest of 759,718 cords was down about 128,000 cords or 14.4 percent compared to the FY 2015 harvest.

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In FY 2016, the average price received for timber sold increased to \$29.84 per cord equivalent compared to \$27.65 in FY 2015, a 7.9 percent increase. In FY 2016, the average price received for timber scaled (harvested) increased to \$28.01 per cord equivalent as compared to \$23.89 in FY 2015, a 17.2 percent increase (Figure 4). In a given fiscal year, timber sales revenue is a combination of a 15 percent down payment at the time of sale plus the 85 percent balance due when harvested.

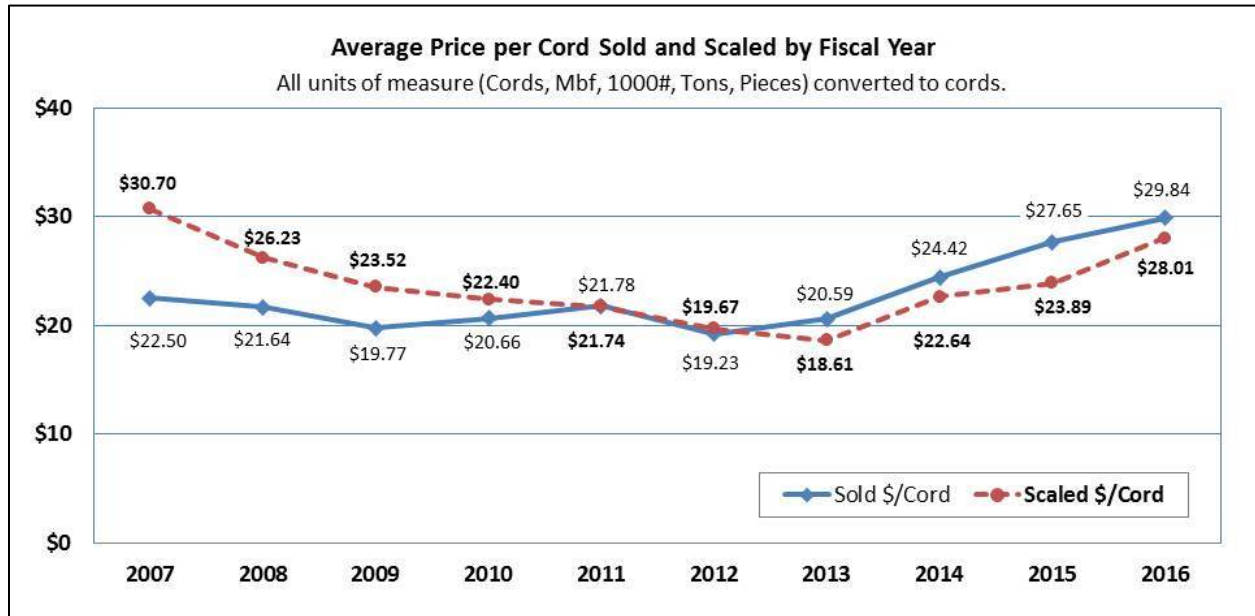


Figure 4: DNR-Forestry 10-Year History Average Prices Received for Timber Sold and Scaled.

Due to the timber market collapse that began in August 2006, the average price per cord sold for state timber dropped by about two-thirds in FY2009 compared to the value received in FY2005. Many of the sales that were sold in FY2005-06 for \$60-plus per cord were forfeited and then resold in subsequent years for \$20 per cord or less. Due to the harvest of windstorm-damaged salvage timber sales in FY2012-13, the average price per cord of timber harvested (scaled) decreased. Local market scarcity, driven by tight aspen supply, has been driving price increases for key species and products since FY 2013.

III. FINANCIAL PERFORMANCE COMPARISONS

Per Minn. Stat. 16A.125, Subd. 5(c) effective July 1, 2013, “the [cost] certificate shall include an analysis that compares costs certified under this section with costs incurred on other public and private lands with similar land assets.” This topic was addressed in the recently completed Office of the Legislative Auditor (OLA) Evaluation Report on DNR Forest Management.² In this report, OLA concluded “...that differences in forest management goals, policies, and land features prevent meaningful comparisons of profitability between state forest managers and other land managers” (2014 OLA Report, p81). However, the OLA report included an “efficiency” comparison between DNR’s combined Tower, Hibbing, and Cloquet forestry areas and Saint Louis County (SLC) Minnesota Land Department. The basis for comparison was new cords offered per full-time equivalent (FTE). OLA found “...the efficiency of the [DNR] Forestry Division’s timber sales activity compared favorably with SLC’s activity” (2014 OLA Report, p87). With that being said, a comparative analysis of financial performance is provided with the following caveats:

1. Profit potential, a function of land productivity, species/product mix, management policy, and geography, is somewhat variable within the Upper Midwest region and relatively low when compared with the Pacific Northwest and Southern U.S.
2. Availabililty of detailed financial reporting in the public domain is extremely limited.
3. Organizational differences in land and resource management entities result in a variety of combinations of land related management activities including: forestry, real estate, minerals, and recreation.
4. Sources of revenue and other funding are highly variable between organizations.
5. Cost accounting formats are not uniform among land management organizations; available accounting numbers require a range of adjustments to be somewhat comparable.
6. With one exception, financials are self reported and unaudited.

The analysis of financial performance included: profit potential, profitability, management efficiency, and land productivity. Of the land managing entities analyzed, operating margins ranged from 6.9 percent (CNF) to 55.4 percent (PCH) with DNR-Forestry managed School Trust reporting an operating margin of 30.2 percent (Table 3). Profit potential (gross revenue per cord) ranged from \$24.81 per cord (SLC) to \$81.48 per cord (PCH) with DNR-Forestry managed School Trust land reporting \$27.68 per cord. In terms of management efficiency, cost per cord ranged from \$19.21 per cord (CAS) to \$40.51 per cord (CNF) with DNR-Forestry managed School Trust reporting \$21.18 per cord. In terms of land productivity/policy, cords harvested per managed acre ranged from 0.20 (CNF) to 1.09 (PCH) with DNR-Forestry managed School Trust land reporting an average 0.23 cords harvested per managed acre.

² Office of the Legislative Auditor, Program Evaluation Division. 2014. Evaluation Report DNR Forest Management. Saint Paul, MN: Office of the Legislative Auditor, State of Minnesota. 107p.

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Table 3: Minn. Stat. 16A.125, Subd. 5.c - Financial Performance Comparisons. (a)

(amounts in thousands, except as noted)	MNDNR School Trust FY2016	CAS County CY2015	SLC County CY2015	CNF Federal FY2016	PCH REIT CY2015
REVENUES					
Timber Sales (Stumpage)	\$10,761.5	\$1,738.1	\$5,096.0	\$3,989.5	\$137,790.0
Land Use	\$1,033.4	\$77.3	\$801.5	\$160.1	
Total Revenue	\$11,794.9	\$1,815.4	\$5,897.5	\$4,149.6	\$137,790.0
EXPENSES					
Total Expenditure	\$8,236.3	\$1,015.0	\$4,317.5	\$3,864.5	\$61,440.0
INCOME FROM OPERATIONS					
Profit/(Loss) from Operations	\$3,558.6	\$800.4	\$1,580.0	\$285.1	\$76,350.0
PROFIT POTENTIAL					
Gross Timber Rev per Cord (b)	\$27.68	\$32.89	\$24.81	\$41.82	\$81.48
Gross Revenue per Mgmt Acre	\$7.86	\$10.20	\$9.38	\$9.03	\$88.90
PROFITABILITY					
Operating Margin	30.2%	44.1%	26.8%	6.9%	55.4%
Operating P/(L) per Cord (b)	\$9.15	\$15.14	\$7.69	\$2.99	\$45.15
MGMT EFFICIENCY					
Cost per cord	\$21.18	\$19.21	\$21.02	\$40.51	\$36.33
LAND PRODUCTIVITY					
Cords Harvested per Mgmt Acre (c)	0.23	0.23	0.23	0.20	1.09
STATISTICAL DATA					
Fiscal Year End	June 30	Dec 31	Dec 31	Sept 30	Dec 31
Cords Sold	427.2	65.3	203.2	98.9	
Cords Harvested	350.4	40.4	207.7	91.9	1,691.0
Avg. of Cords Sold & Harvested	388.8	52.9	205.4	95.4	
Timber Mgmt Acres	1,500.0	178.0	628.8	459.3	1,550.0
Total Admin Acres	2,520.3	255.7	893.2	666.5	1,572.0

Table Notes

- a) Comparisons include: Cass County MN (CAS), Saint Louis County MN (SLC), Chippewa National Forest MN (CNF), and Potlatch Timber REIT-Resource Management Segment AL, AR, ID, MN, MS (PCH).
- b) Used cords sold or harvested if average of cords sold and harvested not available.
- c) Used administered acres if commercial management timber acres not available.