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FOREST SERVICE

Vegetation Management Projects Approved during Calendar Years 2003 through 2005 Using Categorical Exclusions

Statement of Robin M. Nazzaro, Director
Natural Resources and Environment



Mr. Chairman and Members of the Subcommittee:

I am pleased to be here today to discuss the Forest Service's use of categorical exclusions to approve vegetation management projects.¹ As you know, under the National Environmental Policy Act of 1969 (NEPA), agencies evaluate the likely environmental effects of proposed projects using an environmental assessment (EA) or a more detailed environmental impact statement (EIS) if the projects are likely to significantly affect the environment. However, if an agency determines that the activities of a proposed project fall within a category of activities that it has already determined have no significant environmental impact, it may approve the project without an EA or EIS—instead granting the project a categorical exclusion. As of 2003, the Forest Service had established one categorical exclusion for vegetation management activities that covered certain activities intended to improve timber stands or wildlife habitat. In 2003, it added four more categorical exclusions to (1) reduce hazardous fuels, (2) allow the limited harvest of live trees, (3) salvage dead or dying trees, and (4) remove trees to control the spread of insects or disease.

The extent to which the Forest Service approves vegetation management projects using categorical exclusions has been controversial. Critics assert that the Forest Service's use of them is an attempt to circumvent NEPA by precluding the need to perform an EA or EIS. In contrast, supporters state that current analysis and documentation requirements for an EA or EIS under NEPA are too burdensome and that the categorical exclusions allow the agency to more efficiently implement vegetation management projects. Little is known about the Forest Service's use of the vegetation management categorical exclusions because, prior to 2005, the agency did not maintain nationwide data on their use.

My testimony today summarizes the findings of our October 2006 report that discusses for calendar years 2003 through 2005, how many vegetation management projects the Forest Service approved, including how many were approved using categorical exclusions; which categorical exclusions the agency used; and the primary reasons why Forest Service ranger districts are not using the categorical exclusions for vegetation management.² This report is based on

¹Vegetation management projects may include, but are not limited to, activities such as using prescribed burning, timber harvests, or herbicides; or thinning trees, grass, weeds, or brush. Projects that include these types of activities are intended to, among other things, maintain healthy ecosystems, reduce the risk of catastrophic wildland fire, and manage the nation's forests for multiple uses, such as timber, recreation, and watershed management.

²GAO, *Forest Service: Use of Categorical Exclusions for Vegetation Management Projects, Calendar Years 2003 through 2005*, GAO-07-99 (Washington, D.C.: Oct. 10, 2006).

information we collected from all 155 national forests representing 509 ranger districts that manage National Forest System lands. It is also based on interviews we conducted at 23 ranger districts at 12 national forest units.

Summary

In summary, from calendar years 2003 through 2005, the Forest Service approved 3,018 vegetation management projects to treat about 6.3 million acres. Most of these projects—about 72 percent—were approved using categorical exclusions to treat slightly less than half of the acres—2.9 million—while about 28 percent were approved using an EA or EIS to treat the remaining 3.4 million acres. Even though more projects were approved using categorical exclusions than using an EA or EIS, the total treatment acreage was about the same because the relative size of projects approved using categorical exclusions was much smaller than those approved using an EA or EIS. According to Forest Service officials, the number and size of vegetation management projects and type of environmental analysis used varied depending upon the forest's size, ecology, and location.

Of the nearly 2,200 vegetation management projects approved using categorical exclusions during calendar years 2003 through 2005, the Forest Service most frequently used the categorical exclusion for improving timber stands or wildlife habitat. This categorical exclusion accounted for half of the projects approved using the five vegetation management categorical exclusions. For the remaining projects, the Forest Service primarily used the categorical exclusion for reducing hazardous fuels, followed by salvaging dead or dying trees, conducting limited timber harvests of live trees, and removing trees to control the spread of insects or disease. While the categorical exclusion for timber stand or wildlife habitat improvement was the most frequently used and included the most treatment acres—about 2.4 million of the 2.9 million acres included in all projects approved using categorical exclusions—92 percent of the projects approved using this categorical exclusion were smaller than 5,000 acres.

Of the 509 ranger districts, about 11 percent had not used any of the five vegetation management categorical exclusions during the 3-year period. The percentage of ranger districts not using a specific categorical exclusion varied by type of categorical exclusion, however. Just over 90 percent of the 509 ranger districts had not used the categorical exclusion for the removal of trees to control the spread of insects or disease and about 32 percent had not used the categorical exclusion to improve timber stands or wildlife habitat. Reasons cited for not using a categorical exclusion varied by type of categorical exclusion and ranger district. For example, not all ranger districts had used the categorical exclusion for removing insect- or disease-infested trees because they did not have these

types of trees or because projects for removing such trees had already been or were to be included in an EA or EIS.

Background

The Forest Service is responsible for managing over 192 million acres of public lands—about 30 percent of all federal lands in the United States. In carrying out its responsibilities, the Forest Service traditionally has administered its programs through 9 regional offices, 155 national forests, 20 national grasslands, and several hundred ranger districts.

Under NEPA, agencies such as the Forest Service generally evaluate the likely effects of projects they propose using a relatively brief EA or, if the action would be likely to significantly affect the environment, a more detailed EIS. However, an agency may generally exclude categories of actions from the requirement to prepare an EA or EIS if it has determined that the actions do not individually or cumulatively have a significant impact on the environment—these categories are known as categorical exclusions. The agency may then approve projects fitting within the relevant categories using these predetermined categorical exclusions rather than carrying out project-specific environmental analyses. For a project to be approved using a categorical exclusion, the agency must determine whether any extraordinary circumstances exist in which a normally excluded action may have a significant effect.^{3,4}

As of 2003, the Forest Service had one categorical exclusion available for use in approving certain vegetation management activities—timber stand or wildlife habitat improvement—that has no acreage limitation.⁵ In 2003, after reviewing

³Resource conditions that should be considered in determining whether extraordinary circumstances exist include, among other things, the existence of federally listed threatened or endangered species or designated critical habitat; congressionally designated wilderness areas; inventoried roadless areas; and archaeological sites or historic properties. The mere presence of one or more of these conditions does not preclude the use of a categorical exclusion. Rather, it is the degree of the potential effect of the proposed action on these conditions that determines whether extraordinary circumstances exist.

⁴The Forest Service may decide to prepare an EA for a project that could qualify for approval using a categorical exclusion.

⁵In addition to the timber stand and wildlife habitat improvement categorical exclusion, the Forest Service previously had a categorical exclusion for timber sales of 250,000 board-feet or less of merchantable wood products or 1 million board-feet of salvage. In 1999, a federal district court issued a nationwide injunction barring use of this categorical exclusion, holding that the agency did not provide any rationale for why the specified magnitude of timber sales would not have a significant effect on the environment. *Heartwood v. U.S. Forest Service*, 73 F. Supp. 2d 962,975 (S.D. Ill. 1999), *aff'd on other grounds*, 230 F. 3d 947 (7th Cir. 2000).

and evaluating data on the environmental effects of vegetation management projects that had been carried out by the national forests, the Forest Service added four new vegetation management categorical exclusions, each of which has acreage limitations: (1) hazardous fuels reduction activities using prescribed fire, not to exceed 4,500 acres, and mechanical methods such as thinning, not to exceed 1,000 acres; (2) limited timber harvests of live trees, not to exceed 70 acres; (3) salvage of dead or dying trees, not to exceed 250 acres; and (4) removal of trees to control insects and disease, not to exceed 250 acres.⁶ Appendix I provides more detailed information on the Forest Service's five vegetation management categorical exclusions.

Categorical Exclusions Were Used to Approve the Majority of Vegetation Management Projects and about Half of the Total Treatment Acres

For calendar years 2003 through 2005, the Forest Service approved about 3,000 vegetation management projects to treat about 6.3 million acres. Of these projects, the Forest Service approved about 70 percent using categorical exclusions and the remaining projects using an EA or EIS. Although a majority of projects were approved using categorical exclusions, these projects accounted for slightly less than half of the total treatment acres because the size of these projects was much smaller than those approved using an EA or EIS. Table 1 provides this information in greater detail.

Table 1: Number of Vegetation Management Projects Approved and Treatment Acres for Different Types of Environmental Analyses (Calendar Years 2003 through 2005)

	Type of environmental analysis			Total
	Environmental impact statement	Environmental assessment	Categorical exclusion	
Number of projects (percent of total)	141 (4.7)	690 (22.9)	2,187 (72.5)	3,018 (100.0)^a
Number of treatment acres (percent of total)	899,225 (14.4)	2,506,984 (40.0)	2,856,472 (45.6)	6,262,681 (100.0)^a
Median number of treatment acres (range) ^b	2,768 (51 to 60,000)	1,366 (1 to 124,971)	215 (1 to 97,326)	375 (1 to 124,971)

Source: GAO.

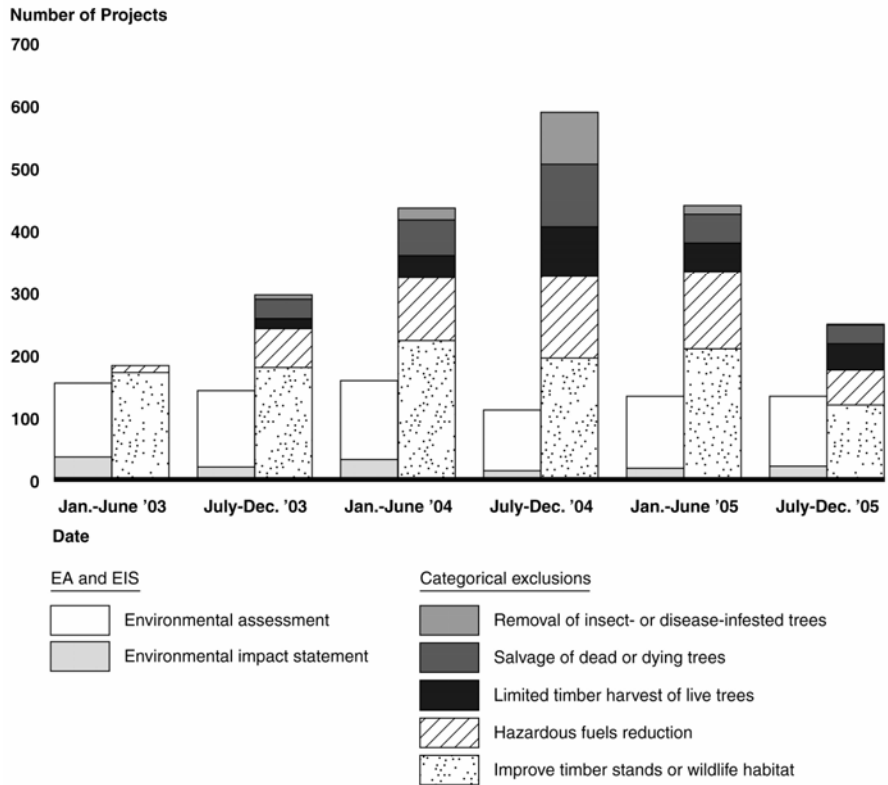
^aNumbers may not total to 100 percent due to rounding.

⁶68 *Fed. Reg.* 33814 (June 5, 2003) and 68 *Fed. Reg.* 44598 (July 29, 2003).

^bOf the 3,018 vegetation management projects, 113 had no acreage or an unknown acreage, according to the Forest Service. The acreage associated with a vegetation management project may be zero or unknown because, among other reasons, the unit of measure for the project is in miles of roadside to be treated or number of trees to be removed. These projects were not used in calculating the median or range of treatment acres.

Our analysis of the project data also revealed that the total number of vegetation management projects approved, including those approved using categorical exclusions, varied over the 3-year period, while the number of treatment acres did not. As can be seen in figure 1, the number of projects approved using an EA or EIS varied little over the 3-year period; however, the number of projects approved using categorical exclusions increased from January 2003 through December 2004—primarily because of an increased use of the four new categorical exclusions—and then decreased from January through December 2005. Forest Service officials said that any number of factors could have influenced the increase and subsequent decrease in the use of categorical exclusions over the 3-year period. However, given the relatively short period of time during which the four new categorical exclusions were in use, these officials said that it was not possible to speculate why the decrease had occurred.

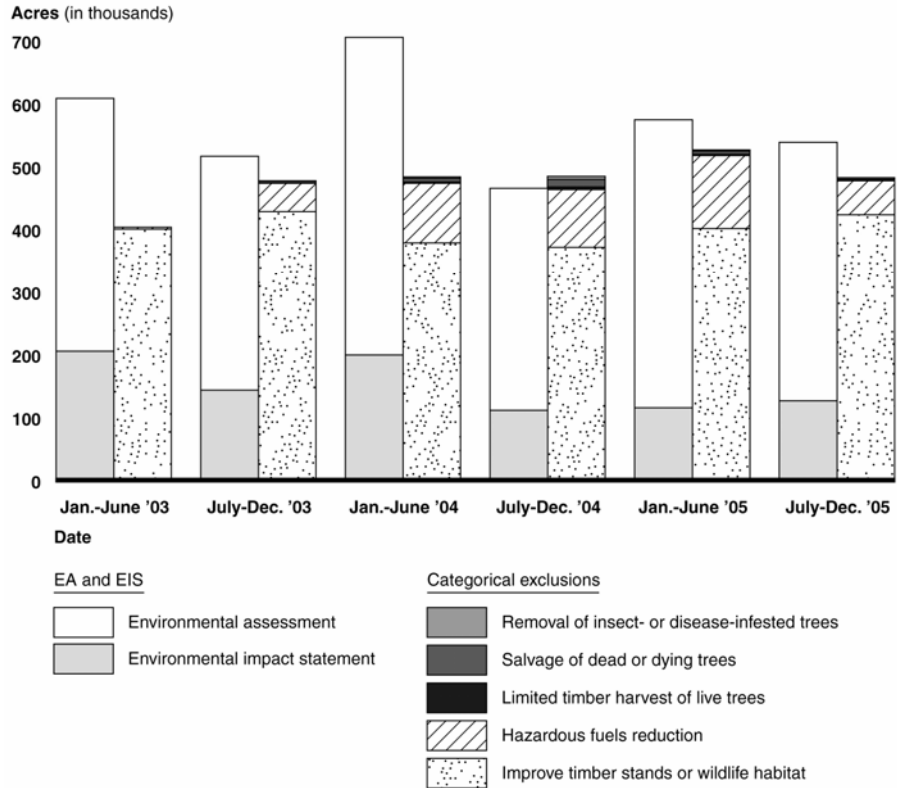
Figure 1: Number of Vegetation Management Projects Approved Using an EA, EIS, or Categorical Exclusion (Calendar Years 2003 through 2005)



Source: GAO.

In contrast, as can be seen in figure 2, an analysis of the total treatment acres included in projects approved using an EA, EIS, or a categorical exclusion did not reveal any notable change over the 3-year period.

Figure 2: Number of Treatment Acres Included in those Projects Approved Using an EA, EIS, or Categorical Exclusion (Calendar Years 2003 through 2005)



Source: GAO.

We also found that the number of vegetation management projects approved, including those approved using categorical exclusions, varied by Forest Service region and forest. For example, of all vegetation management projects approved nationwide, Region 8—the Southern Region—accounted for about 29 percent, of which just over two-thirds were approved using categorical exclusions. In contrast, Region 10—Alaska—accounted for about 2 percent of all vegetation management projects, about 60 percent of which were approved using categorical exclusions. According to several Forest Service officials, the number of vegetation management projects approved and the type of environmental analysis used in approving them depended on the forest’s size, ecology, and location, as the following illustrates:

At the 1.8 million-acre Ouachita National Forest, a pine and hickory forest in western Arkansas and southeastern Oklahoma, 163 projects were approved—119 using categorical exclusions. Forest officials said the forest has a very active

vegetation management program because, among other things, the types of trees located on the forest tend to regenerate quickly and are an excellent product for milling. In addition, a large timber harvest infrastructure is located nearby, which helps ensure that timber sale contracts can be readily competed and awarded.

At the 28,000-acre Caribbean National Forest, a humid tropical forest in Puerto Rico, no vegetation management projects were approved. According to forest officials, the forest does not have an active vegetation management program because the forest focuses more on developing recreational sites and wildlife habitat and because the island has no commercial infrastructure to support harvesting or milling timber.

Appendix II provides detailed information on the number of vegetation management projects and acres Forest Service regions approved using different types of environmental analysis, for calendar years 2003 through 2005.

The Categorical Exclusion for Improving Timber Stands or Wildlife Habitat Was the Most Frequently Used

Of the almost 2,200 projects approved using categorical exclusions over the 3-year period, the Forest Service most frequently used the vegetation management categorical exclusion for improving timber stands or wildlife habitat; this categorical exclusion was used on half of the projects to treat about 2.4 million acres. As shown in table 2, for the remaining projects, the Forest Service primarily used the categorical exclusion for reducing hazardous fuels, followed by salvaging dead or dying trees, conducting limited timber harvests of live trees, and removal of trees to control the spread of insects or disease; in all, these categorical exclusions were used to approve treatments on about a half-million acres. In addition, the size of approved projects varied depending on the categorical exclusion and any associated acreage limitation.

Table 2: Number of Vegetation Management Projects Approved and Treatment Acres for Different Types of Categorical Exclusions (Calendar Years 2003 through 2005)

	Improve timber stands or wildlife habitat (no acre limitation)	Hazardous fuels reduction (5,500-acre limitation)	Salvage of dead or dying trees (250-acre limitation)	Limited timber harvest of live trees (70-acre limitation)	Removal of insect- or disease-infested trees (250-acre limitation)	Total
Number of projects (percent of total)	1,094 (50.0)	485 (22.2)	264 (12.1)	220 (10.1)	124 (5.7)	2,187 (100.0)^a
Number of treatment acres (percent of total)	2,402,188 (84.1)	405,546 (14.2)	28,939 (1.0)	10,541 (0.4)	9,258 (0.3)	2,856,472 (100.0)^a
Median number of treatment acres (range) ^b	433 (1 to 97,326)	450 (1 to 4,637)	96 (1 to 250)	59 (1 to 70)	8 (1 to 250)	215 (1 to 97,326)

Source: GAO.

^aNumbers may not add to 100 percent due to rounding.

^bOf the 2,187 vegetation management projects approved using categorical exclusions, 71 had no acreage or an unknown acreage, according to the Forest Service. The acreage associated with a vegetation management project may be zero or unknown because, among other reasons, the unit of measure for the project is listed as miles of roadside to be treated or number of trees to be removed. These projects were not used in the calculation of the median or range. In addition, the Forest Service indicated that for 38 projects, in addition to the categorical exclusion cited as being used, one or more of the remaining four categorical exclusions was also used. We counted only the first categorical exclusion cited.

According to Forest Service officials, a number of factors influenced the reasons that the categorical exclusion for timber stand or wildlife habitat improvement was used most frequently for the most treatment acreage. For example, officials at the George Washington and Jefferson National Forests and the Monongahela National Forest said they relied on this categorical exclusion more than others because the use of this category was consistent with their forest management plans, which dictate the types of activities that may take place on their forests. Santa Fe National Forest officials said that the forest has relied heavily on this categorical exclusion because it does not have an acreage limitation.

We also analyzed the categorical exclusion for timber stand or wildlife habitat improvement to determine whether its lack of size limitation resulted in projects that are larger than those undertaken using the other four exclusions that have acreage limitations. We found that almost 92 percent of the 1,054 projects⁷

⁷Of the 1,094 projects approved using the categorical exclusion to improve timber stands or wildlife habitat, 40 had no acreage or an unknown acreage, according to the Forest Service.

approved using the categorical exclusion for timber stand or wildlife habitat improvement were smaller than 5,000 acres—which is the approximate size limitation of the categorical exclusion for hazardous fuels reduction, the largest size limitation of the four more recent categorical exclusions.

Primary Reasons for Not Using Vegetation Management Categorical Exclusions Varied Depending on the Ranger District and Type of Categorical Exclusion

Eleven percent of the 509 ranger districts had not used any of the five vegetation management categorical exclusions during the 3-year period. The percentage of ranger districts that did not use specific categorical exclusions ranged widely, from 91 percent not using the category for the removal of trees to control the spread of insects or disease, to 32 percent not using the category for timber stand or wildlife habitat improvement. Ranger districts' reasons for not using a specific categorical exclusion also varied. The primary reason cited for not using the categorical exclusion for the removal of trees to control the spread of insects or disease was that their forests did not have insect- or disease-infested trees and that projects that could have fit the category had already been or were to be included in an EA or EIS. Similarly, the primary reasons cited for not using the categorical exclusion for timber stand or wildlife habitat improvement were that projects that could have fit the category had already been or were to be included in an EA or EIS and no projects were undertaken to improve stands or wildlife habitat. Appendix III provides the number of ranger districts not using one of the five vegetation management categorical exclusions and primary reasons cited for not doing so.

Ranger district officials we interviewed offered some reasons for why specific vegetation management categorical exclusions may not be used. For example,

The Tonasket Ranger District, located in north-central Washington State in the Okanogan-Wenatchee National Forests, had not used the categorical exclusion for the removal of trees to control the spread of insects or disease because, according to district officials, the 250-acre size limitation of the categorical exclusion constrains its use. The district has huge areas infested with beetles and mistletoe and, to be effective, any salvage would have to cover a much larger area.

The Canyon Lakes Ranger District, located in north-central Colorado in the Arapaho-Roosevelt National Forests, had not used the categorical exclusion for timber stand or wildland habitat improvement. According to ranger district officials, they have not used this categorical exclusion because project planning typically consists of an EA or EIS. These types of environmental analysis allow the district to better evaluate multiple activities over large geographic areas using a single analysis—which is more efficient than approving different projects using several vegetation management categorical exclusions.

Concluding Comments

Because four of the five categorical exclusions have only been available since 2003, it is premature to draw any conclusions about trends in the Forest Service's use of them to approve vegetation management projects. More information over a longer period of time will be useful in addressing some of the controversial issues, such as whether categorical exclusions, individually or cumulatively, have any significant effect on the environment or whether their use is enabling more timely Forest Service vegetation management.

Mr. Chairman, this concludes my prepared statement. I would be pleased to answer any questions that you or other Members of the Subcommittee may have at this time.

GAO Contacts and Staff Acknowledgements

For further information about this testimony, please contact me at (202) 512-3841 or nazzaror@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this statement. David P. Bixler, Assistant Director; Rich Johnson; Marcia Brouns McWreath; Matthew Reinhart; and Carol Herrnstadt Shulman made key contributions to this statement.

Appendix I: Forest Service's Vegetation Management Categorical Exclusions

Type of categorical exclusion for vegetation management and conditions	Examples of activities
Timber stand or wildlife habitat improvement	
No acreage restrictions. May not use herbicides. No more than 1 mile of low standard road construction. ^a	<p>Girdling trees to create snags.^b</p> <p>Thinning or brush control to improve growth or reduce fire hazard, including the opening of an existing road to a dense timber stand.</p> <p>Prescribed burning to control understory hardwoods in stands of southern pine.</p> <p>Prescribed burning to reduce natural fuel build-up and improve plant vigor.</p>
Hazardous fuels reduction activities using prescribed fire; and mechanical methods for crushing, piling, thinning, pruning, cutting, chipping, mulching, and mowing	
<p>Prescribed fire not to exceed 4,500 acres and mechanical methods not to exceed 1,000 acres. Activities are limited to (1) areas in the wildland-urban interface or (2) designated areas outside the wildland-urban interface.^c Activities must</p> <ul style="list-style-type: none"> be identified through a collaborative framework as described in <i>A Collaborative Approach for Reducing Wildland Fire Risks to Communities and Environment 10-Year Comprehensive Strategy Improvement Plan</i>, May 2002; be conducted consistent with agency and departmental procedures and applicable land and resource management plans; not include the use of herbicides or pesticides or the construction of new permanent roads or other new permanent infrastructure, and may include the sale of vegetative material if the primary purpose of the activity is hazardous fuels reduction; and not be conducted in wilderness areas or impair the suitability of wilderness study areas for preservation as wilderness. 	<p>Prescribed burning.</p> <p>Mechanically crushing, piling, thinning, pruning, cutting, chipping, mulching, and mowing.</p>
Limited harvest of live trees	
Not to exceed 70 acres. No more than one-half mile of temporary road construction. This categorical exclusion is not to be used for harvesting or generating same-aged trees or converting to a different type of vegetation. May include incidentally removing trees for landings, skid trails, and road clearing.	<p>Removing individual trees for saw logs, specialty products, or fuel wood.</p> <p>Commercial thinning of overstocked stands to achieve the desired stocking level to increase health and vigor.</p>
Salvage of dead and/or dying trees	
Not to exceed 250 acres. No more than one-half mile of temporary road construction. May include incidentally removing trees for landings, skid trails, and road clearing.	<p>Harvesting a portion of a stand damaged by a wind or ice event and construction of a short temporary road to access the damaged trees.</p> <p>Harvesting fire-damaged trees.</p>

Type of categorical exclusion for vegetation management and conditions**Examples of activities****Removal of insect- or disease-infested trees**

Not to exceed 250 acres. No more than one-half mile of temporary road construction. Includes removing infested or infected trees and adjacent live un-infested or uninfected trees as determined necessary to control the spread of insects or disease. May include incidentally removing trees for landings, skid trails, and road clearing.

Felling and harvesting trees infested with southern pine beetles and immediately adjacent un-infested trees to control expanding spot infestations.

Removing and destroying infested trees affected by a new exotic insect or disease, such as emerald ash borer, Asian long horned beetle, and sudden oak death pathogen.

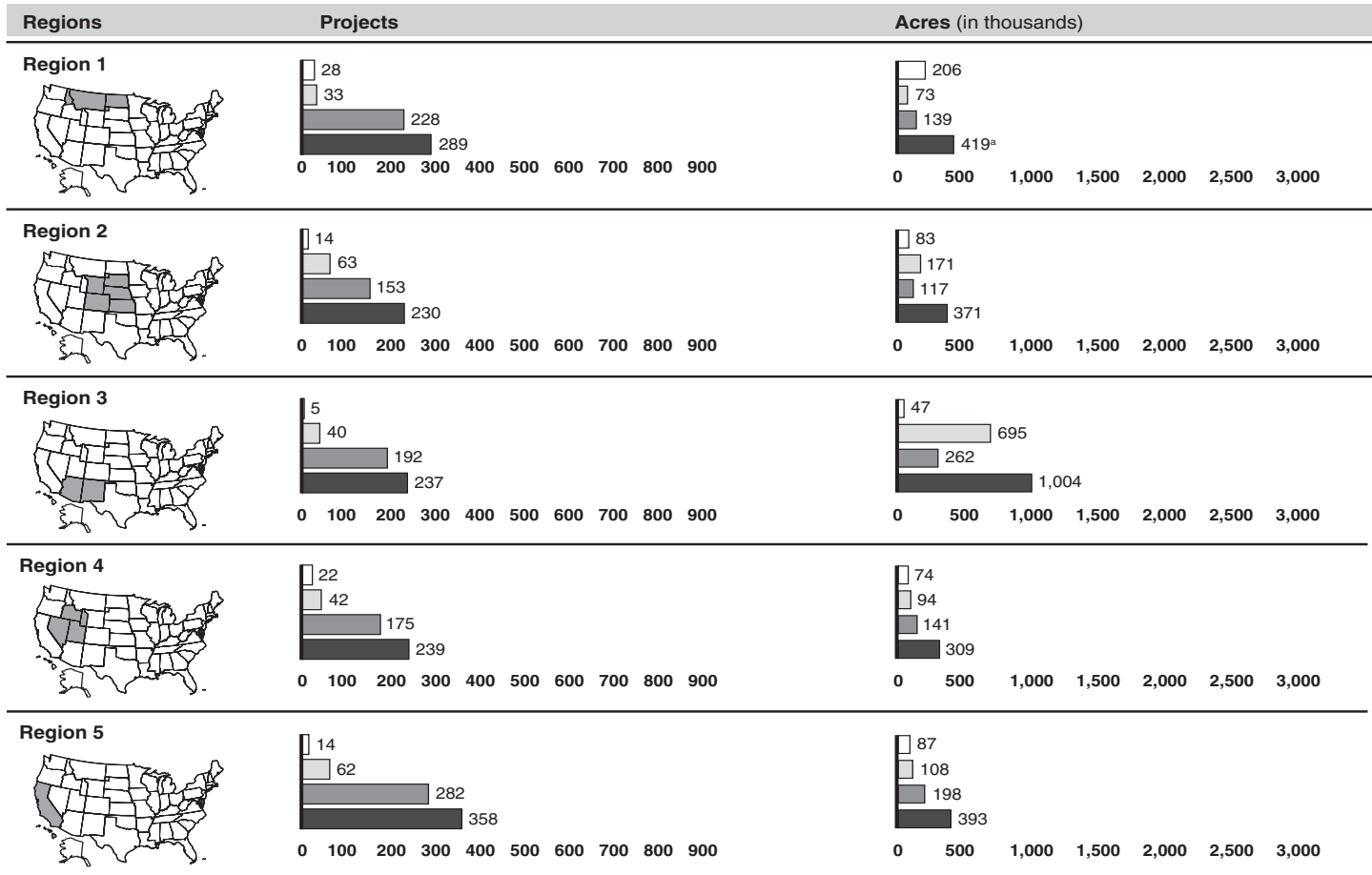
Source: Forest Service Handbook.

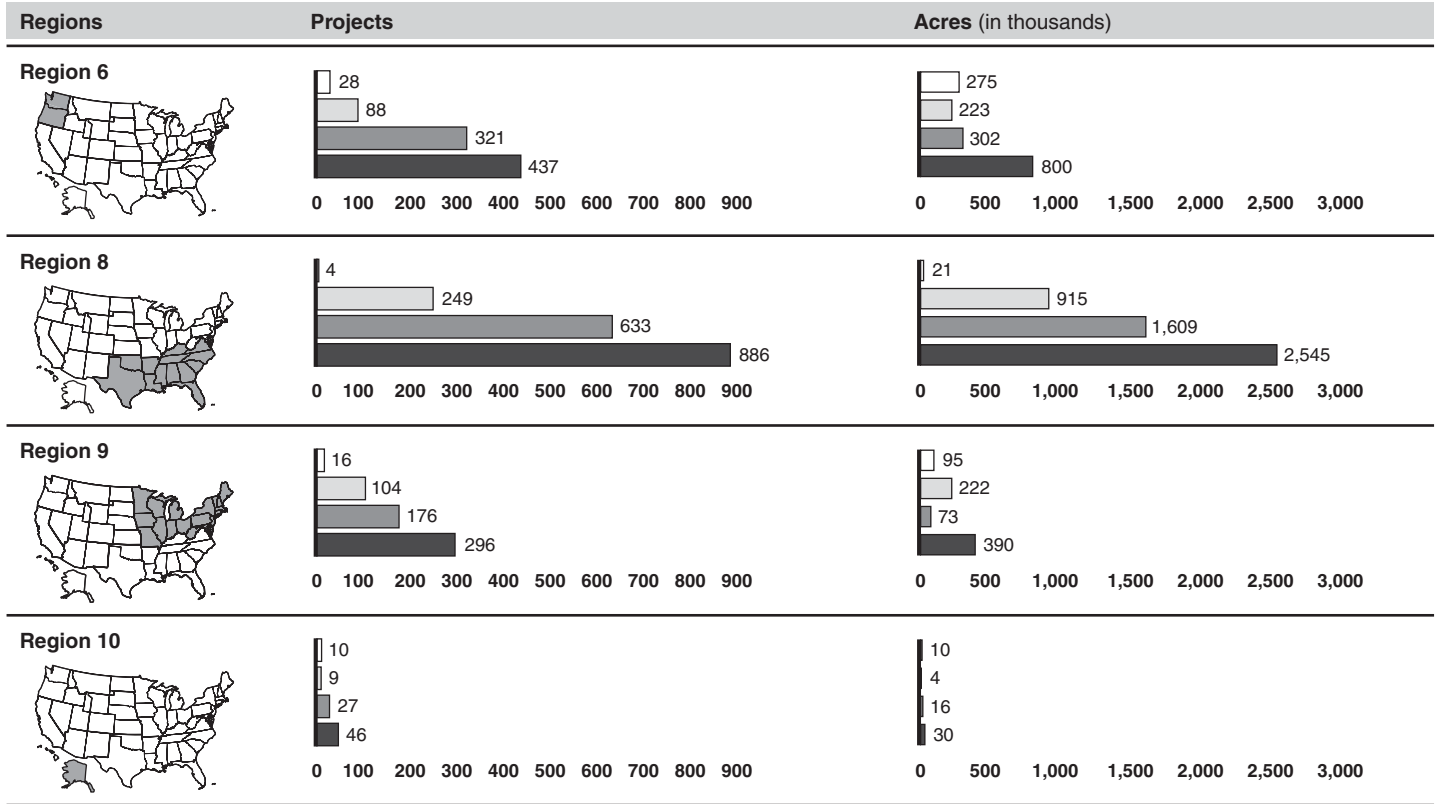
^aA low standard road is one which has a rough and irregular surface where traffic flow is slow and two-way traffic is difficult. While the road can accommodate high clearance vehicles, it may not provide safe service to all traffic.

^bGirdling is a process whereby tree trunks are severed to remove the outer layers of bark and other woody material. This constricts the level of nutrients available to support tree life and can result in a snag—a standing, dead tree.

^cThese include certain areas with fire regimes that have been moderately or significantly altered from historical ranges.

Appendix II: Number of Projects and Acres by Type of Environmental Analysis and Forest Service Region (2003 - 2005)





Environmental impact statement
 Environmental assessment
 Categorical exclusion
 Total

Source: GAO.

Note: Of the 3,018 vegetation management projects, 113 had no acreage or an unknown acreage, according to the Forest Service. The acreage associated with a vegetation management project may be zero or unknown because, among other reasons, the unit of measure for the project is listed as miles of roadside to be treated or number of trees to be removed.

^aNumbers do not add due to rounding.

Appendix III: Number of Ranger Districts Not Using One of the Five Categorical Exclusions and Reasons Why (2003 – 2005)

	Categorical exclusion				
	Removal of insect- or disease-infested trees (250-acre limitation)	Limited timber harvest of live trees (70-acre limitation)	Salvage of dead or dying trees (250-acre limitation)	Hazardous fuels reduction (5,500-acre limitation)	Improve timber stands or wildlife habitat (no acreage limitation)
Number of the 509 (percent of total) ranger districts that had not used the categorical exclusion	462 (90.8)	395 (77.6)	353 (69.4)	256 (50.3)	165 (32.4)
Primary reason for not using an exclusion	Number of ranger districts not using the categorical exclusion that cited the primary reason				
Lack of insect- or disease-infested trees	114 (24.7)	a	a	a	a
Size (acreage) of potential projects is larger than that allowed	27 (5.8)	110 (27.9)	36 (10.2)	22 (8.6)	a
Lack of dead or dying trees to salvage	a	a	95 (26.9)	a	a
Projects that could fit the category have already been or will be included in an environmental assessment or impact statement	108 (23.4)	100 (25.3)	66 (18.7)	62 (24.2)	59 (35.8)
No projects undertaken to improve timber stands or wildlife habitat	a	a	a	a	61 (37.0)
Have insect- or disease-infested trees, but other priorities precluded its use	88 (19.1)	a	a	a	a
Lack of internal Forest Service resources to propose and plan a vegetation management project	27 (5.8)	55 (13.9)	28 (7.9)	33 (12.9)	26 (15.8)
Lack of required wildland fire risk reduction plan for using the category	a	a	a	46 (18.0)	a
Have dead or dying trees, but other priorities precluded its use	a	a	47 (13.3)	a	a
Other categorical exclusion used	14 (3.0)	16 (4.1)	13 (3.7)	21 (8.2)	2 (1.2)
Lack of commercial infrastructure to harvest or salvage trees	14 (3.0)	21 (5.3)	16 (4.5)	2 (0.8)	2 (1.2)
No hazardous fuels	a	a	a	13 (5.1)	a
Ranger district or national forest preference to use an environmental assessment as opposed to the categorical exclusion	5 (1.1)	13 (3.3)	8 (2.3)	6 (2.3)	5 (3.0)
Other reasons	64 (13.9)	80 (20.3)	45 (12.7)	51 (20.0)	10 (6.1)

Source: GAO.

^aThe primary reason listed was not applicable to the categorical exclusion and, thus, was not an option for the Forest Service to choose.

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