

GAO

Report to the Ranking Minority Member,
Subcommittee on Forests and Forest
Health, Committee on Resources, House
of Representatives

October 2006

FOREST SERVICE

Use of Categorical Exclusions for Vegetation Management Projects, Calendar Years 2003 through 2005



G A O

Accountability * Integrity * Reliability



Highlights

Highlights of [GAO-07-99](#), a report to the Ranking Minority Member, Subcommittee on Forests and Forest Health, Committee on Resources, House of Representatives

Why GAO Did This Study

The Forest Service manages over 192 million acres of land, in part through vegetation management projects such as thinning trees. The National Environmental Policy Act (NEPA) requires the Forest Service to prepare either an environmental assessment (EA) or an environmental impact statement (EIS) before approving a project that may significantly affect the environment. The agency generally does not need to prepare such environmental analyses, however, if the project involves categories of activities that it previously found to have no significant environmental effects—activities known as a categorical exclusion. As of 2003, the Forest Service had one categorical exclusion—activities to improve timber stands or wildlife habitat. It has since added four new exclusions, but little is known about their use.

GAO was asked to determine, for calendar years 2003 through 2005, (1) how many vegetation management projects the Forest Service approved, including those approved using categorical exclusions; (2) which categorical exclusions the agency used in approving projects; and (3) if field offices are not using categorical exclusions, why. To answer these objectives, GAO surveyed Forest Service officials from all of the 155 national forests.

In commenting on a draft of this report, the Forest Service generally agreed with GAO's findings and observations.

www.gao.gov/cgi-bin/getrpt?GAO-07-99.

To view the full product, including the scope and methodology, click on the link above. For more information, contact Robin M. Nazzaro at (202) 512-3841 or nazzaror@gao.gov.

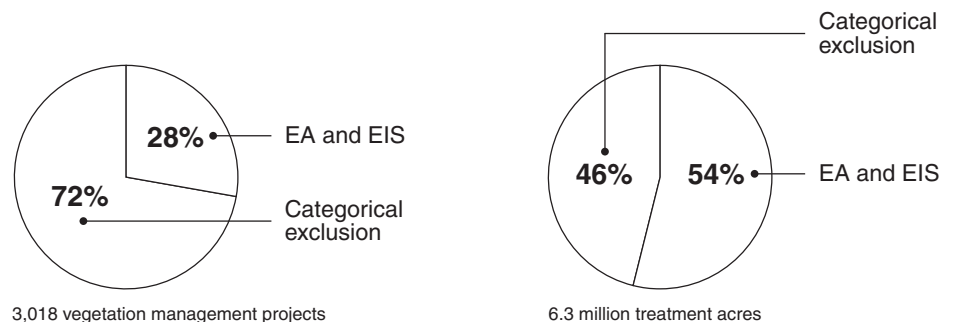
FOREST SERVICE

Use of Categorical Exclusions for Vegetation Management Projects, Calendar Years 2003 through 2005

What GAO Found

For calendar years 2003 through 2005, the Forest Service approved 3,018 vegetation management projects to treat about 6.3 million acres. Of these projects, the Forest Service approved about 28 percent using an EA or EIS to treat about 3.4 million acres, while it approved the remainder using categorical exclusions. Although a majority of the projects were approved using categorical exclusions, these projects accounted for less than half of the total treatment acres. The number and size of projects and types of environmental analysis used during the 3-year period varied, depending upon forest size, ecology, and location, according to Forest Service officials.

Percentage of Vegetation Management Projects and Treatment Acres Approved Using an EA, EIS, or Categorical Exclusion, Calendar Years 2003 through 2005



Source: GAO.

Of nearly 2,200 vegetation management projects approved using categorical exclusions, the Forest Service approved half of them using the categorical exclusion for improving timber stands or wildlife habitat. In approving the remaining projects, the agency primarily used the categorical exclusion for reducing hazardous fuels, followed by those for salvaging dead or dying trees, conducting limited harvests of live trees, and removing trees to control the spread of insects or disease. The projects approved using the categorical exclusion to improve timber stands or wildlife habitat accounted for about 2.4 million of the 2.9 million acres to be treated under projects approved using categorical exclusions.

About 11 percent of the Forest Service's 509 field offices had not used any of the five vegetation management categorical exclusions during the 3-year period. The reasons why they had not used specific categorical exclusions varied by office and categorical exclusion. For example, about 91 percent of the field offices had not used the categorical exclusion for the removal of trees to control the spread of insects or disease primarily because they did not have a sufficient number of insect- or disease-infested trees. Similarly, 32 percent of the field offices had not used the categorical exclusion to improve timber stands or wildlife habitat, primarily because no projects of this type had been proposed during the 3-year period.

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Abbreviations

EA	environmental assessment
EIS	environmental impact statement
NEPA	National Environmental Policy Act

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United States Government Accountability Office
Washington, D.C. 20548

October 10, 2006

The Honorable Tom Udall
Ranking Minority Member
Subcommittee on Forests and Forest Health
Committee on Resources
House of Representatives

Dear Mr. Udall:

The U.S. Department of Agriculture's Forest Service is responsible for managing about 192 million acres of public land—about 30 percent of all federal lands in the United States. Under the National Environmental Policy Act of 1969 (NEPA), agencies evaluate the likely environmental effects of projects they are proposing using an environmental assessment (EA) or, if the projects likely would significantly affect the environment, a more detailed environmental impact statement (EIS). For example, certain proposed vegetation management projects, which include activities such as thinning trees and shrubs and harvesting and selling timber, may require the Forest Service to prepare an EA or EIS for the treatment areas. If, however, the Forest Service determines that activities of a proposed project fall within a category of activities the agency has already determined has no significant environmental impact—called a categorical exclusion—then the agency generally need not prepare an EA or EIS. The agency may instead approve projects that fit within a relevant category by using one of the predetermined categorical exclusions. The extent to which the Forest Service approves projects using these categorical exclusions has been controversial. Some critics argue that, even though these types of projects may be relatively small, the environmental effects of excluded projects are not being fully analyzed. Others favor the expanded use of categorical exclusions as a means to accomplish routine vegetation management projects promptly.

As of 2003, the Forest Service had one categorical exclusion for vegetation management activities—it covered certain activities intended to improve timber stands or wildlife habitat. In 2003, it issued four more categorical exclusions: (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 the spread of insects or disease, not to exceed 250 acres. Little is known about the Forest Service's use of these

categorical exclusions because, prior to 2005, the agency did not maintain nationwide data on their use.

In this context, you asked us to determine, for calendar years 2003 through 2005, (1) how many vegetation management projects the Forest Service approved, including those approved using categorical exclusions, and the number of associated treatment acres; (2) for those projects approved using categorical exclusions, which categorical exclusions the agency used and the associated treatment acreage under each; and (3) if the Forest Service field offices are not approving vegetation management projects using categorical exclusions, what are the primary reasons for not doing so.

Because the Forest Service has no centralized nationwide information on vegetation management projects for calendar years 2003 through 2005, we sent a questionnaire to all 155 national forests to obtain this information.¹ We asked Forest Service officials from these forests to provide information on the number of vegetation management projects they approved during the 3-year period and the number of treatment acres in each project, and whether the Forest Service used an EA, EIS, or one of the five categorical exclusions when approving the projects and, as appropriate, which categorical exclusion was used. We also asked each forest whether each of the ranger districts in that forest—administrative units primarily responsible for deciding which types of environmental analysis should be undertaken on projects within the forests—had used each of the five categorical exclusions during the 3-year period and, if not, why the ranger districts had not done so. All 155 national forests, representing 509 ranger districts that manage National Forest System lands, responded to our questionnaire. We tested the accuracy and reliability of the information by, among other things, requesting supporting documentation from the Forest Service for a randomly selected sample of projects and verifying information submitted about these projects on the questionnaire. We found that the information submitted was sufficiently reliable for our purposes. Using a nonprobability sample, we also selected and interviewed 23 ranger districts at 12 national forest units to obtain a better understanding of why categorical exclusions may or may not have been used when approving vegetation management projects.² These ranger districts and national

¹Our work focused only on national forests; we did not include other types of Forest Service units, such as national grasslands, in our analyses.

²There are 155 national forests, which have been combined into 110 administrative units to enable better management. These 12 administrative units encompass 16 national forests.

forests were selected on the basis of their diverse ecosystems and geographic location. Appendix I provides further details on our scope and methodology. Appendix II provides a list of Forest Service categorical exclusions. Appendixes III through VII provide the results of the questionnaire in more detail. We performed our work from September 2005 through August 2006 in accordance with generally accepted government auditing standards.

Results in Brief

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 the Forest Service approved more projects using categorical exclusions than projects 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 during the 3-year period varied depending upon the forest's size, ecology, and location. For example, the relatively small 440,000-acre Cleveland National Forest, a mixed-conifer and hardwood forest in Southern California, used categorical exclusions when approving all of its 18 vegetation management projects to treat about 16,000 acres. In contrast, the 1.8 million-acre Ouachita National Forest, a pine and hickory forest in western Arkansas and southeastern Oklahoma, approved 163 vegetation management projects to treat 400,000 acres, and of these projects, 119 were approved using categorical exclusions to treat 100,000 acres and the remainder were approved using an EA.

Of the nearly 2,200 vegetation management projects approved using categorical exclusions for 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. 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, while the percentage of ranger districts not using specific categorical exclusions varied by type of categorical exclusion. Specifically, 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 the categorical exclusions varied by type of categorical exclusion and ranger district. The primary reasons cited for not using the category for the removal of trees to control the spread of insects or disease was the lack of insect- or disease-infested trees; 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 category for timber stand or wildlife habitat improvement was projects that could have fit the category had already been or were to be included in an EA or EIS; no projects were undertaken to improve timber stands or wildlife habitat.

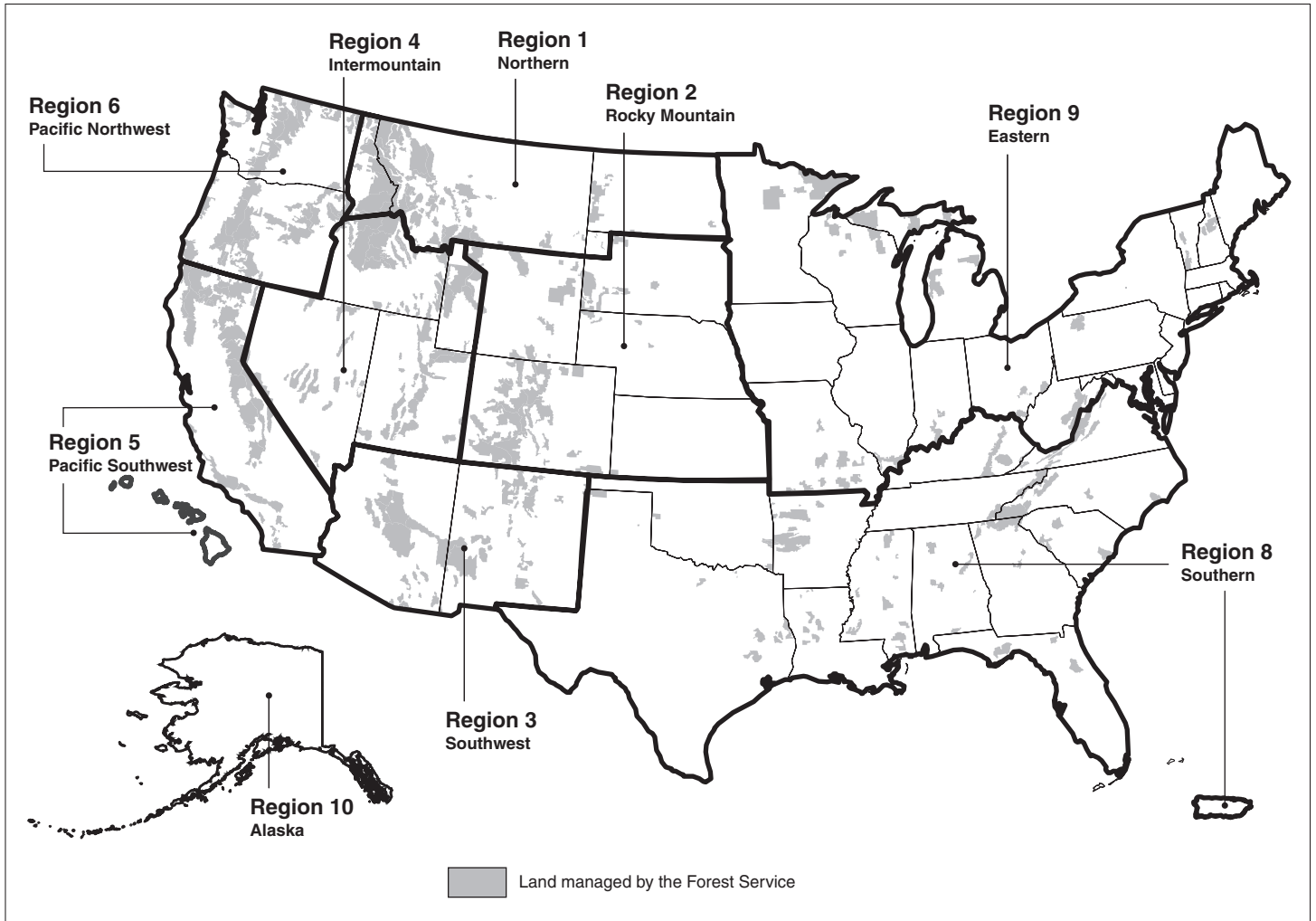
Because the new vegetation management categorical exclusions have been available for only about 3 years, it is premature to draw any conclusions about trends in the Forest Service's use of them in approving vegetation management projects. More information over a longer period of time will be useful in addressing issues surrounding their use, such as whether projects approved using them, individually or cumulatively, have any significant effect on the environment or whether their use is enabling more timely Forest Service vegetation management.

In commenting on a draft of this report, the Forest Service generally agreed with our findings and observations. The agency also provided technical comments that we incorporated in this report, where appropriate. The Forest Service's letter is reprinted in appendix VIII.

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. Figure 1 shows a map of the Forest Service regions and national forests.

Figure 1: Land Managed by the Forest Service, by Region



Source: Forest Service.

Note: The Forest Service does not have a Region 7.

To sustain the health, diversity, and productivity of the nation's forests, the Forest Service can propose land management projects that may change the existing condition of vegetation—projects referred to as vegetation management. Vegetation 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.

Under NEPA, agencies such as the Forest Service generally evaluate the likely environmental effects of projects they propose using an EA or, if the projects likely would significantly affect the environment, a more detailed EIS.³ However, an agency generally need not prepare an EA or EIS if it determines that activities of a proposed project fall within a category of activities the agency has already determined have no significant environmental impact—called categorical exclusions. The agency may then approve projects fitting within the relevant categories using these predetermined categorical exclusions rather than carrying out a project-specific EA or EIS. For a project to be approved using a categorical exclusion, the Forest Service must determine whether any extraordinary circumstances exist in which a normally excluded action or project may have a significant effect.^{4,5} To establish categorical exclusions, the Forest Service must determine that the categories of activities proposed for exclusion do not individually or cumulatively have a significant impact on the environment. In doing so, the public is to be provided an opportunity to review and comment on proposed categorical exclusions.

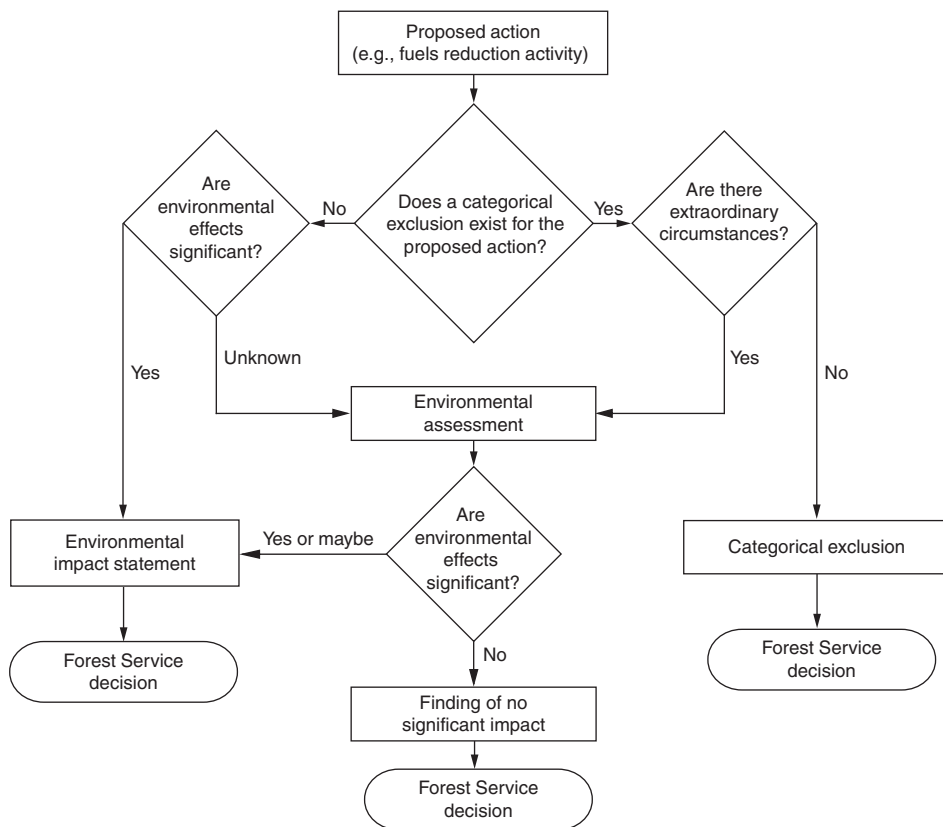
³NEPA also established the Council on Environmental Quality, which is responsible for, among other things, issuing guidelines and reviewing agencies' policies and procedures to ensure compliance with the act. CEQ regulations implementing NEPA appear at 40 C.F.R. Part 1500. Each agency shall as necessary adopt procedures supplementing the CEQ regulations. The procedures shall be adopted only after an opportunity for public review and after review by the council for conformity with the act and these regulations. Among other things, the procedures must contain specific criteria for and identification of those typical classes of actions that do not normally require an EA or EIS (i.e., categorical exclusions).

⁴Resource 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.

⁵The Forest Service may decide to prepare an environmental assessment for a project that could qualify for approval using a categorical exclusion.

Figure 2 shows the NEPA process the Forest Service generally follows for assessing the likely environmental impacts of land management activities.

Figure 2: Forest Service NEPA Process



Source: GAO.

As of 2003, the Forest Service had one categorical exclusion for use in approving projects involving certain vegetation management activities—timber stand or wildlife habitat improvement—that, still today, has no acreage limitation.⁶ In 2003, after reviewing 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, (2) limited timber harvests of live trees, (3) salvage of dead or dying trees, and (4) removal of trees to control insects and disease.⁷ Table 1 summarizes the Forest Service’s five vegetation management categorical exclusions, including the four approved in 2003, along with any corresponding acreage limitations. (App. II provides a complete list of the Forest Service’s categorical exclusions.)

Table 1: 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	<ul style="list-style-type: none"> • Girdling trees to create snags.^b • Thinning or brush control to improve growth or to reduce fire hazard, including the opening of an existing road to a dense timber stand. • Prescribed burning to control understory hardwoods in stands of southern pine. • Prescribed burning to reduce natural fuel buildup and improve plant vigor.

⁶In 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).

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

(Continued From Previous Page)

Type of categorical exclusion for vegetation management and conditions

Examples of activities

Hazardous fuels reduction activities using prescribed fire, and mechanical methods for crushing, piling, thinning, pruning, cutting, chipping, mulching, and mowing

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

- be identified through a collaborative framework as described in *A Collaborative Approach for Reducing Wildland Fire Risks to Communities and Environment 10-Year Comprehensive Strategy Improvement Plan, 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.

- Prescribed burning.
- Mechanically crushing, piling, thinning, pruning, cutting, chipping, mulching, and mowing.

Limited timber 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.

- Removing individual trees for saw logs, specialty products, or fuel wood.
- Commercial thinning of overstocked stands to achieve the desired stocking level to increase health and vigor.

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.

- 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.
- Harvesting fire-damaged trees.

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 uninfested 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 uninfested 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 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.

The Forest Service requires agency officials responsible for making vegetation management project decisions to prepare and retain a file and decision memo⁸ for each vegetation management project approved using a categorical exclusion.⁹ Decision memos are to include, among other information, the title of each proposed action, an outline of the decision being made, a description of the public's involvement in the decision-making process, and the date for implementing the project.

Controversy has surrounded the Forest Service's use of vegetation management categorical exclusions because, on the one hand, critics assert that the use of categorical exclusions is an attempt to circumvent NEPA by precluding the need to perform an EA or EIS. Supporters, on the other hand, have responded that current analysis and documentation requirements for an EA or EIS under NEPA are too burdensome and that the new categorical exclusions allow the Forest Service to more efficiently undertake routine vegetation management activities. Adding to this controversy, the Forest Service initially did not subject projects being approved using the five vegetation management categorical exclusions to a formal notice, comment, and appeal process as it did to projects being approved using an EA or EIS. As a result of litigation, the Forest Service now requires that vegetation management projects being approved using these categorical exclusions be subject to formal notice, comment, and

⁸In addition to categorical exclusions requiring decision memos, the Forest Service has categorical exclusions not requiring decision memos. Projects that do not require a decision memo include routine activities such as establishing Forest Service-wide administrative procedures, program processes, or instructions, and repairing and maintaining administrative sites by replacing roofs or storage sheds or painting buildings.

⁹According to the Forest Service, the extent of analyses and documentation prepared for projects is related to the types of actions involved; the potential for extraordinary circumstances; and compliance with other laws such as the Endangered Species Act and the National Historic Preservation Act, regulations, and policies. Analyses and documentation for projects approved using categorical exclusions are typically less than those approved using an EA or EIS and, although they may not be detailed in decision memos, are to be included in project files.

appeal.¹⁰ Critics argue that such public involvement is essential for responsive decision making, while others argue the formal appeal process is unnecessarily burdensome and prevents the Forest Service from undertaking routine vegetation management activities in a timely manner.¹¹ The debate surrounding the use of categorical exclusions centers on the types of vegetation management projects approved using categorical exclusions, how often the categorical exclusions are used, and how many acres are treated when using them.

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

For calendar years 2003 through 2005, as shown in table 2, 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.

¹⁰*Earth Island Institute v. Pengilly*, 376 F. Supp. 2d 994 (E.D. Cal. 2005), *aff'd in part sub. nom.*, *Earth Island v. Ruthenbeck*, Civ. No. 05-16975 (9th Cir. 2006). In the ruling, the court held that the Appeals Reform Act "... certainly permits exclusion of environmentally insignificant projects from the appeals process." However, it stated that "actions that concern 'land and resource management plans ... shall' be subject to notice, comment, and appeal procedures."

¹¹Legislation pending in the Senate would exempt projects being approved using categorical exclusions from formal public notice, comment, and appeal.

Table 2: 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)^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)^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)

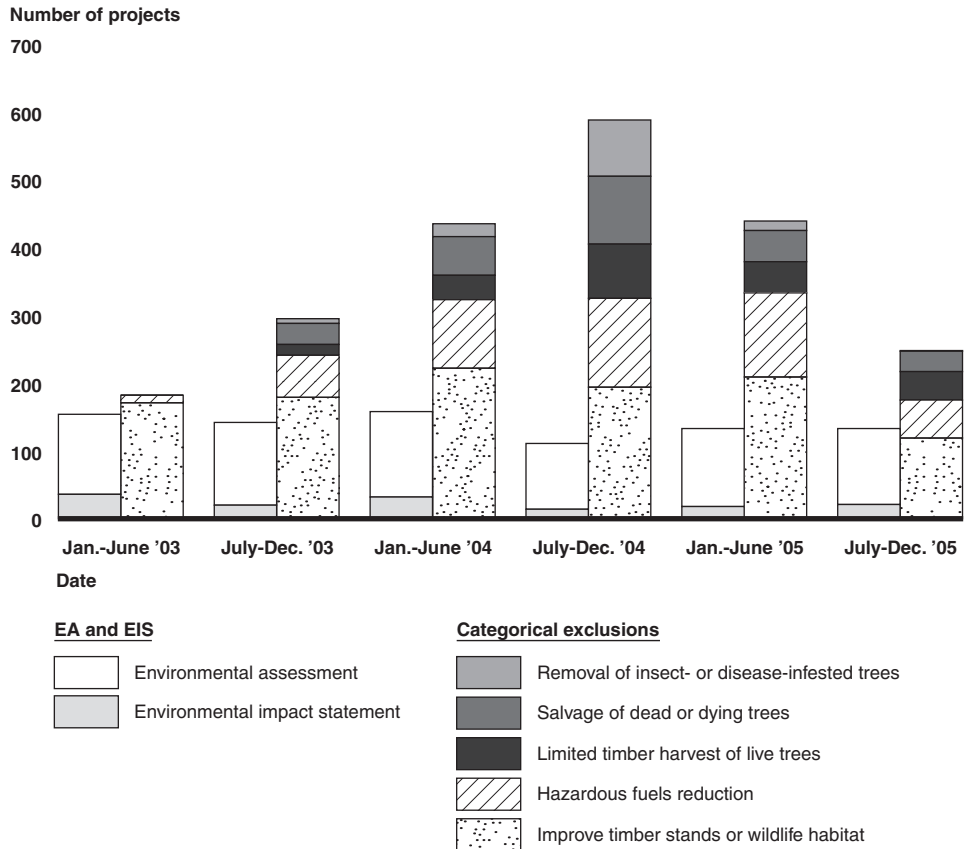
Source: GAO.

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

^bOf the 3,018 vegetation management projects, 113 had no acreage or 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 was relatively constant. As can be seen in figure 3, 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 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.

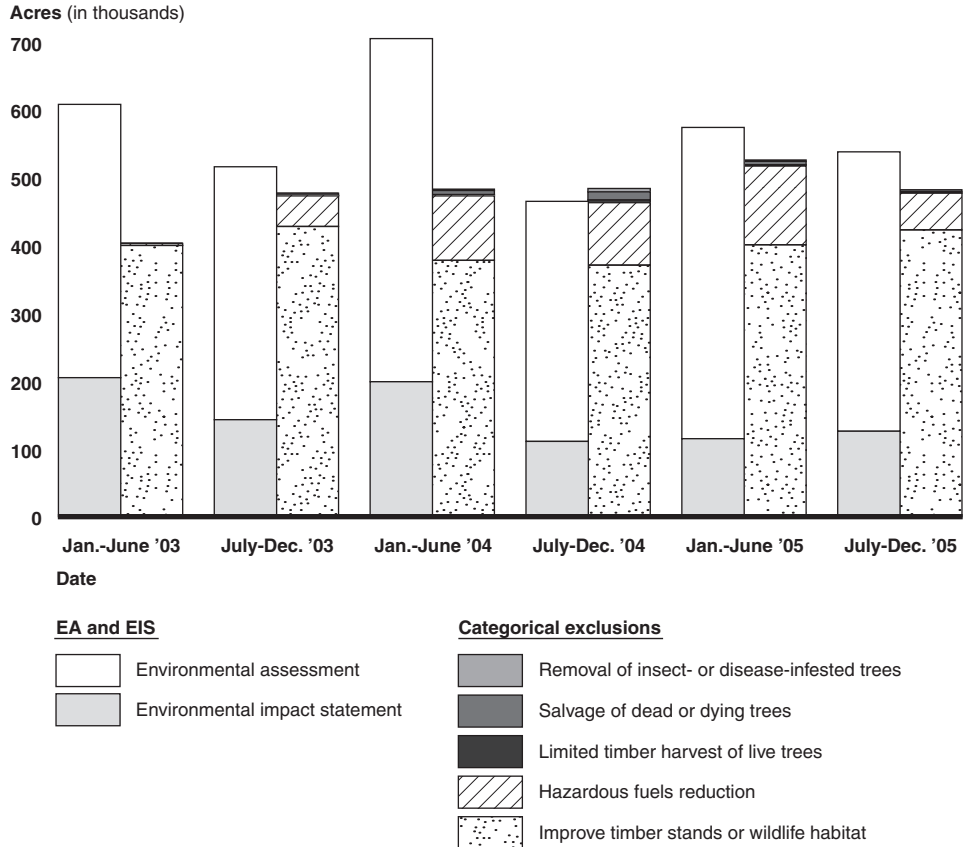
Figure 3: Number of Vegetation Management Projects Approved Using an EA, EIS, or Categorical Exclusion (Calendar Years 2003 through 2005)



Source: GAO.

In contrast, as can be seen in figure 4, an analysis of the total treatment acres included in projects approved using an EA, EIS, or categorical exclusion did not reveal any notable change over the 3-year period.

Figure 4: Number of Treatment Acres Included in Projects Approved Using an EA, EIS, or Categorical Exclusion (Calendar Years 2003 through 2005)



Source: GAO.

Additional analyses of the project data also revealed 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 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 can be seen in the following examples:

- At the 2 million-acre Superior National Forest, a pine, fir, and spruce forest, in rural northeastern Minnesota, forest officials relied more on environmental assessments and environmental impact statements in approving projects because most of the projects were larger in terms of geographic coverage and more inherently complex; they used categorical exclusions only for a few smaller scale projects or projects undertaken in response to unanticipated events such as a wind storm that blew down trees on several hundred thousands of acres and that subsequently needed to be removed to reduce the risk of wildland fire. Of the 13 projects approved, forest officials used either environmental impact statements or environmental assessments in approving 8 and categorical exclusions in approving 5.
- At the 1.8 million-acre Ouachita National Forest, a pine and hickory forest in western Arkansas and southeastern Oklahoma, 163 projects were approved—of which 119 were approved 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 440,000-acre Cleveland National Forest, a mixed conifer and hardwood forest in Southern California, Forest Service officials said they prepared an EA or EIS infrequently for managing vegetation because the projects were necessarily small, given the forest's limited size. Cleveland forest officials approved all of its 18 projects using categorical exclusions for calendar years 2003 through 2005.
- 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 does not have a commercial infrastructure to support harvesting or milling timber.

Appendixes III and IV provide detailed information on the number of vegetation management projects and acres approved using different types of environmental analyses for calendar years 2003 through 2005.

Categorical Exclusion for Improving Timber Stands or Wildlife Habitat Was Used the Most Frequently to Treat the Most Acreage

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 can be seen in table 3, 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 3: Number of Vegetation Management Projects Approved and Treatment Acres for Different Types of Categorical Exclusions (Calendar Years 2003 through 2005)

	Categorical exclusion					Total
	Improve timber stands or wildlife habitat (no acreage 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)	
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)^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)^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 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 primary categorical exclusion cited, one or more of the

remaining four categorical exclusions were also used. We counted only the primary categorical exclusion cited.

According to Forest Service officials, a number of factors influenced why the categorical exclusion for timber stand or wildlife habitat improvement was the most frequently used for the most treatment acreage. For example, Santa Fe National Forest officials said that the forest has relied heavily on this exclusion because it does not have an acreage limitation. Also, 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. Further, Okanogan-Wenatchee National Forests officials said they rely primarily on the timber stand or wildlife habitat improvement categorical exclusion because of its long-standing use and the beneficial nature of projects being undertaken, which enhances their public acceptability.

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. As can be seen in table 4, we found that almost 92 percent of the projects 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.

Table 4: Number of Projects Approved Using the Categorical Exclusion to Improve Timber Stands or Wildlife Habitat, by Number of Treatment Acres (Calendar Years 2003 through 2005)

	Number of treatment acres						Total
	1-999	1,000-1,999	2,000-2,999	3,000-3,999	4,000-4,999	5,000 or more	
Number of projects (percent of total)	701 (66.5)	125 (11.9)	69 (6.5)	37 (3.5)	35 (3.3)	87 (8.3)	1,054 ^a (100)

Source: GAO.

^aOf the 1,094 projects approved using the categorical exclusion to improve timber stands or wildlife habitat, 40 had no acreage or unknown acreage, according to the Forest Service. The acreage associated with these projects 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.

Appendixes V and VI provide detailed information on the number of vegetation management projects and acres approved using different categorical exclusions for calendar years 2003 through 2005.

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

Of the 509 ranger districts, 11 percent had not used any of the five vegetation management categorical exclusions during the 3-year period. As can be seen in table 5, 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. Reasons cited by the ranger districts also varied: The primary reasons cited for not using the category for the removal of trees to control the spread of insects or disease were the lack of 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 category 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 timber stands or wildlife habitat.

Table 5: Number of Ranger Districts Not Using One of the Five Vegetation Management Categorical Exclusions and Primary Reasons Cited for Not Doing So (Calendar Years 2003 through 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 ranger districts that had not used the categorical exclusion (percent of total)	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

(Continued From Previous Page)

	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)
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 EA 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.

Ranger district officials we interviewed offered some reasons why vegetation management categorical exclusions may not be used:

- The Laurentian Ranger District, located in northern Minnesota in the Superior National Forest, did not use the categorical exclusion for the removal of trees to control the spread of insects or disease because, according to district officials, it had no insect- or disease-infested trees suitable for harvest.
- The Tonasket Ranger District, located in north-central Washington 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 because the district has huge areas infested with beetles and mistletoe. 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, this categorical exclusion was not used because project planning typically consists of conducting an EA or EIS. These types of environmental analysis allow the district to better evaluate multiple activities over larger geographic areas using a single analysis—which is more efficient than approving different projects using several vegetation management categorical exclusions.
- The Mountainair Ranger District, located in central New Mexico in the Cibola National Forest, had not used the categorical exclusion for limited timber harvests of live trees primarily because, according to district officials, the state lacked a commercial timber industry that is capable of harvesting and milling timber. District officials also said that timber harvests would have to be much larger than 70 acres and include much larger diameter trees, to be profitable and attract timber companies from out of state.

Appendix VII provides more detailed information on the primary reasons cited by the ranger districts for not using vegetation management categorical exclusions for calendar years 2003 through 2005.

Observations

Because four of the five categorical exclusions have been available only for the past 3 years, it is premature to draw any conclusions about trends in their use. More information, over a longer period of time, is necessary to better determine how the agency is using categorical exclusions, what types of projects are being approved, and which forests are using them. More importantly, such information will be useful in addressing some of the controversial issues surrounding the use of categorical exclusions in approving projects, such as whether these projects, individually or cumulatively, have any significant effect on the environment or whether their use is enabling more timely Forest Service vegetation management.

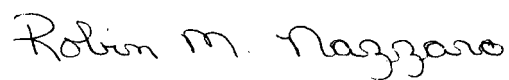
Agency Comments and Our Evaluation

We received written comments on a draft of this report from the Forest Service. The Forest Service generally agreed with our findings and observations, and specifically that it is premature to extrapolate trends given the studied categorical exclusions' limited period of use. The agency provided us with technical comments that we have incorporated, as appropriate. The Forest Service's letter is reprinted in appendix VIII.

As arranged with your office, unless you publicly announce its contents earlier, we plan no further distribution of this report until 30 days from the report date. At that time, we will send copies to the Secretary of Agriculture, the Chief of the Forest Service, and other interested parties. We will also make copies available to others upon request. This report will also be available at no charge on the GAO Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, 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 report. GAO staff who made major contributions to this report are listed in appendix IX.

Sincerely yours,

A handwritten signature in black ink that reads "Robin M. Nazzaro". The signature is written in a cursive style with a large initial 'R' and 'M'.

Robin M. Nazzaro
Director, Natural Resources
and Environment

Scope and Methodology

We were asked to determine how many vegetation management projects the Forest Service approved for calendar years 2003 through 2005, including those approved using categorical exclusions, and the number of associated acres proposed for treatment. To obtain this information, we developed a questionnaire addressed to forest supervisors. A questionnaire was used because the Forest Service has no centralized data on the (1) number of vegetation management projects that were undertaken for calendar years 2003 through 2005, or how many acres were proposed for treatment under these projects; (2) projects that were approved using categorical exclusions, which categorical exclusions were used and the associated acres being treated; or (3) reasons why categorical exclusions were not used. While the Forest Service has a national database—the Planning, Appeals, and Litigation System—that provides some information on projects and the types of environmental analysis used in approving the projects, the system does not generally include data prior to January 2005 or the number of treatment acres. Because information about individual vegetation management projects is located primarily at the district offices, we asked forest supervisors to coordinate the completion of the questionnaire through each forest’s environmental planning coordinator, who is familiar with National Environmental Policy Act (NEPA) requirements. We also asked that the environmental planning coordinator work with other forest officials, such as ranger district officials, to respond to the questionnaire. After developing the questionnaire, we pretested it at the Cibola and Santa Fe National Forests in New Mexico, Humboldt-Toiyabe National Forests in Nevada, George Washington and Jefferson National Forests in Virginia, Monongahela National Forest in West Virginia, and Ouachita National Forest in Arkansas.

For this report, we defined a vegetation management project as any project that may include, but is not limited to, activities such as timber sales; salvage sales; and the lopping, dropping, chipping, shredding, burning, masticating, or otherwise thinning of trees, scrub, shrub, grass, weeds, other understory, or brush for multiple purposes. We defined activities as discrete actions or tasks that are intended to accomplish decision objectives. Activities included, for example, stream improvements, precommercial thinning, commercial thinning, slash piling and burning harvest units, timber harvests, and underburning outside harvest units.¹ For each vegetation management project approved, we asked forest officials to identify what type of decision document was used. Decision documents

¹Underburning is prescribed burning under a timber canopy.

include records of decision for environmental impact statements, decision notices for environmental assessments, and decision memos in the case of categorical exclusions. We also asked Forest Service officials to provide data on the total number of acres proposed for vegetation management or to indicate if the acreage was unknown. We asked forest officials not to double-count acreage when multiple treatments were to occur on the same acreage. In reporting acreage data, the number of acres proposed for treatment may not necessarily correspond to the number of acres treated.

For projects approved using categorical exclusions, we asked Forest Service officials to identify the associated acreage proposed for treatment and which of the following five *Forest Service Handbook* categorical exclusions were used:

- timber stand or wildlife habitat improvement activities,
- hazardous fuels reduction activities using prescribed fire not to exceed 4,500 acres and mechanical treatments not to exceed 1,000 acres,
- harvest of live trees not to exceed 70 acres,
- salvage of dead or dying trees not to exceed 250 acres, or
- commercial and noncommercial harvest of trees to control insects or disease not to exceed 250 acres.

We asked only for information on the use of these five categorical exclusions. Thus, our evaluation does not include projects that the Forest Service approved using other categorical exclusions which may have included vegetation management activities. For example, the Forest Service has a categorical exclusion for the repair and maintenance of roads, trails, and land-line boundaries that could include vegetation management activities but the primary purpose of the projects is not vegetation management. We also did not include categorical exclusions for regeneration and postfire rehabilitation—both of which could include vegetation management in the form of planting seedlings or trees. These types of activities, however, may have been included in projects that were approved using the five categorical exclusions we evaluated.

To determine which Forest Service ranger districts were not using categorical exclusions for managing vegetation and the primary reasons for not doing so, we asked Forest Service officials whether ranger districts

within national forests used any of the five categorical exclusions for calendar years 2003 through 2005. If a ranger district had not used one of the five exclusions, we asked the forests to select a primary reason from among a list of reasons that we provided. (If the primary reasons were not included on our list, we also asked the forests to provide other reasons.) In developing our list of reasons, we reviewed the conditions established by the Forest Service that prevented the use of the categorical exclusions. We also pretested the list with Forest Service officials at six national forest units and ranger districts at those locations. While some ranger districts may have had multiple reasons for not using a particular categorical exclusion, we asked Forest Service officials to select the primary reason.

We verified the accuracy of the survey responses by randomly selecting about 3 percent of the projects identified by the Forest Service on completed questionnaires. After selecting a project, we requested supporting decision documents—for example, the record of decision for environmental impact statements, decision notices for environmental assessments, or decision memos for projects approved using categorical exclusions—and verified the documents' information submitted on the questionnaire. In total, we verified information for 84 projects and determined that the data submitted were sufficiently reliable for our purposes. We also examined the data for aberrations such as blank entries and inconsistent responses and, as necessary, contacted the appropriate forest officials for clarification.

The data we gathered have some limitations. The information obtained from the national forests was self-reported, and we were unable to independently ensure whether all vegetation management projects approved during the 3-year period were reported. To gauge the accuracy of the number of projects reported, we compared information on Forest Service Schedule of Proposed Actions reports with information submitted on our questionnaire. The action reports, which are prepared quarterly by each of the national forests, summarize activities the forests plan to undertake during the quarter, including proposed activities that have approved decision documents, such as records of decision, decision notices, or decision memos. These reports are available on individual national forest Web sites and generally span at least two quarters. We identified 113 projects that were listed on available quarterly proposed action reports as projects the Forest Service approved using an environmental assessment, environmental impact statement, or a categorical exclusion and that appeared to be for vegetation management but which were not included on the questionnaires. We randomly selected

12 of these projects for follow up with Forest Service officials to determine why. We found that (1) six of the projects were not for vegetation management and thus correctly should not have been included on the questionnaires or in our data, (2) three of the projects were initially excluded but were subsequently added to revised questionnaires and our data as a result of our previous follow-up to clarify other issues, and (3) three of the projects were erroneously omitted from the questionnaires and should have been included in our data but were not. Forest Service officials said the three projects were erroneously omitted because paperwork was misfiled due to an administrative oversight or district office consolidation or because of confusion over whether the project had been approved. Based on this analysis, we found that the data are sufficiently reliable for our reporting purposes.

Table 6 lists the 12 national forest units and 23 ranger districts we selected for interviews, using a nonprobability sample, to better determine why categorical exclusions may or may not have been used in approving vegetation management projects. The table also lists the Forest Service regions in which the forests and ranger districts are located, and their geographic location.

**Appendix I
Scope and Methodology**

Table 6: National Forests and Ranger Districts Selected for Interviews

Forest Service region	National forest	Location	Ranger district
Region 1	Bitterroot National Forest	Missoula, Montana	Stevensville Ranger District, Darby Ranger District
Region 2	Arapaho and Roosevelt National Forests	Fort Collins, Colorado	Canyon Lakes Ranger District, Boulder Ranger District
Region 3	Santa Fe National Forest	Santa Fe, New Mexico	Pecos/Las Vegas Ranger District, Espanola Ranger District
Region 3	Cibola National Forest	Albuquerque, New Mexico	Magdalena Ranger District, Mountainair Ranger District, Sandia Ranger District
Region 4	Humboldt-Toiyabe National Forests	Sparks, Nevada	Carson Ranger District, Santa Rosa Ranger District
Region 5	Cleveland National Forest	San Diego, California	Descano Ranger District, Trabuco Ranger District
Region 6	Okanogan-Wenatchee National Forests	Okanogan, Washington	Methow Valley Ranger District, Tonasket Ranger District
Region 8	George Washington and Jefferson National Forests	Roanoke, Virginia	Deerfield Ranger District, Glenwood Ranger District, Pedlar Ranger District
Region 8	Ouachita National Forest	Hot Springs, Arkansas	Jessieville Ranger District, Womble Ranger District
Region 9	Monongahela National Forest	Elkins, West Virginia	Potomac Ranger District
Region 9	Superior National Forest	Duluth, Minnesota	Laurentian Ranger District
Region 10	Tongass National Forest	Ketchikan, Alaska	Petersburg Ranger District

Source: GAO.

Note: The Forest Service does not have a Region 7.

We conducted our work from September 2005 through August 2006 in accordance with generally accepted government auditing standards.

Forest Service Categorical Exclusions

As shown in table 7, the Forest Service has two types of categorical exclusions: those that require the agency to prepare a decision memo for each project approved using a categorical exclusion, and those that do not require such documentation.¹ The *Forest Service Handbook* provides information on these categorical exclusions, as well as guidelines for preparing decision memos.

¹While a decision memo is not required for certain categories, one may be prepared at the discretion of the responsible Forest Service official.

Appendix II
Forest Service Categorical Exclusions

Table 7: Forest Service Categorical Exclusions

Decision memo	Categorical exclusion
Required	<ul style="list-style-type: none"> • Constructing and reconstructing trails. • Additional constructing or reconstructing existing telephone or utility lines in a designated corridor. • Approving, modifying, or continuing minor special-use permits of National Forest System lands that require less than 5 contiguous acres of land. • Regenerating an area to native tree species, including site preparation that does not include the use of herbicides or result in vegetation-type conversion. • Undertaking timber stand or wildlife habitat improvement activities that do not include the use of herbicides or do not require more than 1 mile of low standard road construction. • Modifying or maintaining stream or lake aquatic habitat improvement structures using native materials or normal practices. • Conducting short-term (1 year or less) mineral, energy, or geophysical investigations and incidental support activities that may require cross-country travel by vehicles and equipment, less than 1 mile of low standard road construction, or the use and minor repair of existing roads. • Implementing or modifying minor management practices to improve allotment conditions or animal distribution when an allotment management plan is not yet in place. • Conducting hazardous fuels reduction activities using prescribed fire, not to exceed 4,500 acres; and mechanical methods for crushing, piling, thinning, pruning, cutting, chipping, mulching, and mowing, not to exceed 1,000 acres. Activities are limited to certain designated areas, such as the wildland urban interface or other areas having certain types of hazardous fuels. • Carrying out postfire rehabilitation activities, not to exceed 4,200 acres (such as tree planting, fence replacement, habitat restoration, heritage site restoration, repair of roads and trails, and repair of damage to minor facilities such as campgrounds); repairing or improving lands unlikely to recover to a management-approved condition from wildland fire damage, or repairing or replacing minor facilities damaged by fire. • Harvesting live trees, not to exceed 70 acres and requiring no more than one-half mile of temporary road construction. • Salvaging dead or dying trees, not to exceed 250 acres and requiring no more than one-half mile of temporary road construction. • Conducting commercial and noncommercial harvesting of trees to control insects or disease—not to exceed 250 acres and requiring no more than one-half mile of temporary road construction, including removing infested or infected trees and adjacent live uninfested or uninfected trees as determined necessary to control the spread of insects or disease. • Issuing new special-use authorizations for a new term to replace an existing or expired special-use authorization when the only changes are administrative, there are no changes to the authorized facilities or increases in the scope or intensity of authorized activities, and the applicant or holder is in full compliance with the terms and conditions of the special-use authorization.

Appendix II
Forest Service Categorical Exclusions

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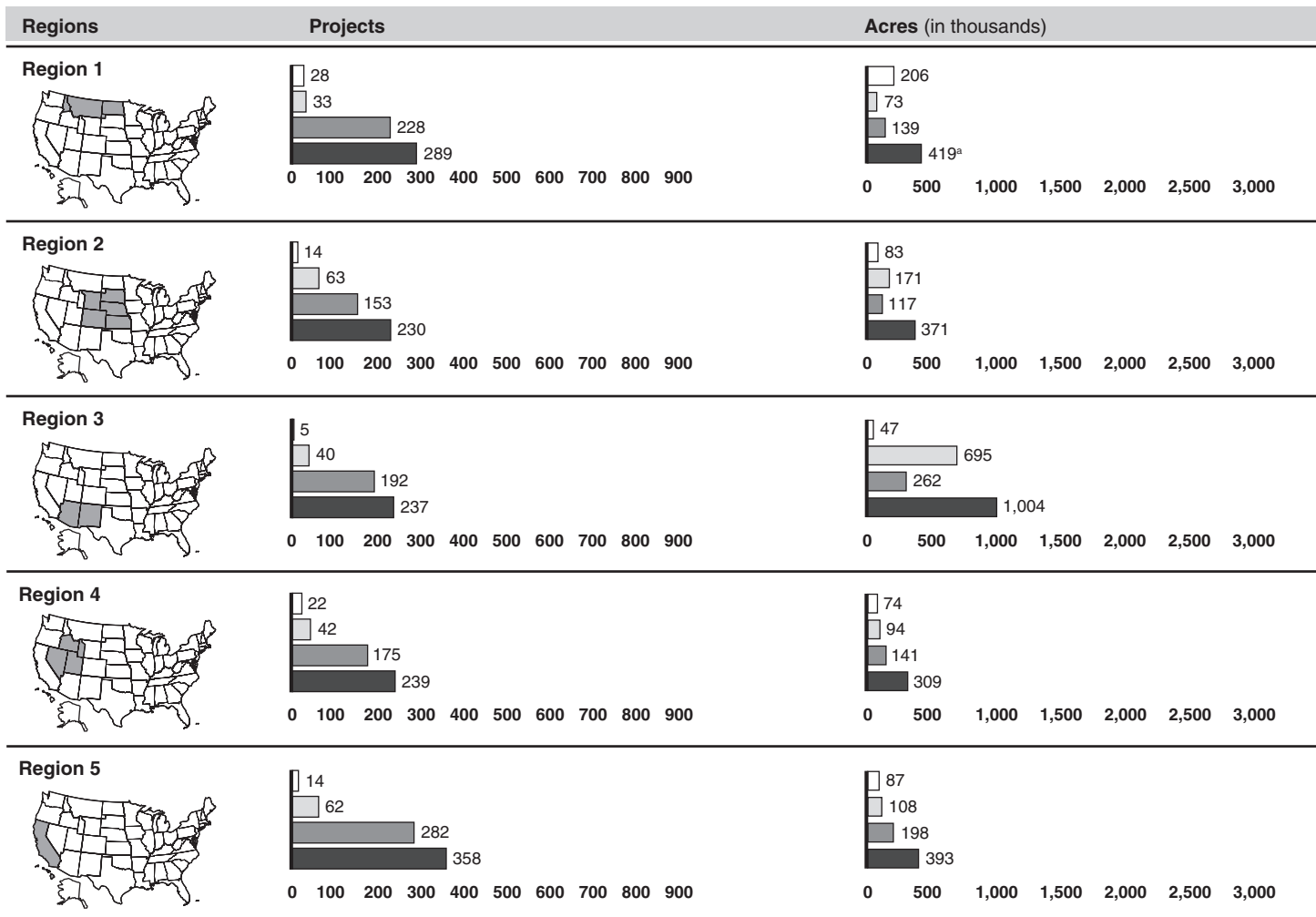
Decision memo	Categorical exclusion
Not required	<ul style="list-style-type: none">• Policy development, planning and implementation that relate to routine activities, such as personnel, organizational changes, or similar administrative functions.• Conducting activities that deal solely with the funding of programs, such as program budget proposals, disbursements, and transfer or reprogramming of funds.• Conducting inventories, research activities, and studies, such as resource inventories and routine data collection when such actions are clearly limited in context and intensity.• Developing and providing educational and informational programs and activities.• Conducting civil and criminal law enforcement and investigative activities.• Advising and consulting other agencies and public and private entities, such as with legal counsel and representation.• Conducting activities related to trade representation and market development abroad.• Issuing orders prohibiting certain activities on National Forest System lands that are intended to provide short-term resource protection or protect public health and safety.• Establishing rules, regulations, or policies for Forest Service-wide administrative procedures, program processes, or instructions.• Repairing and maintaining administrative sites.• Repairing and maintaining roads, trails, and land-line boundaries.• Repairing and maintaining recreation sites and facilities.• Acquiring land or interest in land.• Selling or exchanging land or interest in land and resources where resulting land uses remain essentially the same.• Approving, modifying, or continuing minor, short-term (1 year or less) special uses of National Forest System lands.• Issuing a new permit for up to the maximum tenure allowable under the National Forest Ski Area Permit Act of 1986 for an existing ski area when such issuance is a purely ministerial action to account for administrative changes, such as a change in ownership of ski area improvements, expiration of the current permit, or a change in the statutory authority applicable to the current permit.• Amending or replacing an existing special-use authorization that involves only administrative changes and does not involve changes in the authorized facilities, increases in the scope or intensity of authorized activities, or extensions to the term of authorization when the applicant or holder is in full compliance with the terms and conditions of the special-use authorization.

Source: Forest Service Handbook.

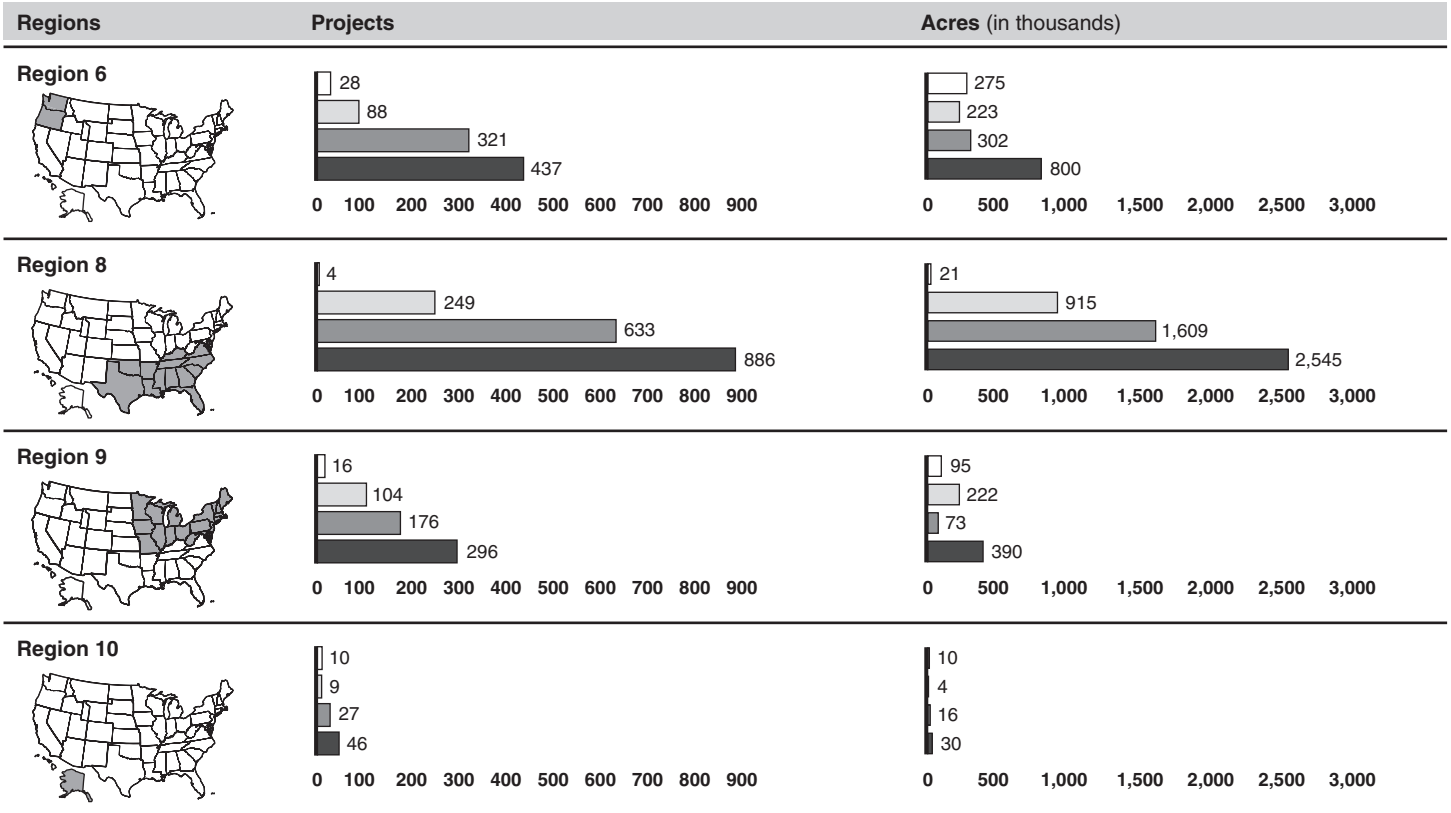
Appendix II
Forest Service Categorical Exclusions

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Number of Projects and Acres by Type of Environmental Analysis and Forest Service Region (Calendar Years 2003 through 2005)



**Appendix III
Number of Projects and Acres by Type of
Environmental Analysis and Forest Service
Region (Calendar Years 2003 through 2005)**



Environmental impact statement
 Environmental assessment
 Categorical exclusion
 Total

Source: GAO.

Notes: Of the 3,018 vegetation management projects, 113 had no acreage or 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 to total due to rounding.

Number of Projects and Acres by Type of Environmental Analysis and National Forest (Calendar Years 2003 through 2005)

Table 8: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 1 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Beaverhead-Deerlodge ^a	Mont.	4	5,357	1	640	21 ^b	3,729	26	9,726
Bitterroot	Idaho, Mont.	1	35,445	1	370	28	9,538	30	45,353
Clearwater	Idaho	1	8,700	8	8,638	9	46,505	18	63,843
Custer	Mont., S.D.	1	34,540	2	24,575	12	9,154	15	68,269
Flathead	Mont.	4	13,929	2	2,855	9	5,601	15	22,385
Gallatin	Mont.	3	16,190	4	4,744	9	6,566	16	27,500
Helena	Mont.	2	7,563	0	0	12	2,255	14	9,818
Idaho Panhandle ^c	Idaho, Mont., Wash.	1	4,036	8	7,729	43	12,763	52	24,528
Kootenai	Idaho, Mont.	7	27,331	5	7,315	36	17,296	48	51,942
Lewis and Clark	Mont.	0	0	0	0	7	2,533	7	2,533
Lolo	Mont.	1	33,681	2	16,563	31	13,545	34	63,789
Nez Perce	Idaho	3	19,566	0	0	11	9,903	14	29,469
Total		28	206,338	33	73,429	228	139,388	289	419,155

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Beaverhead and Deerlodge National Forests.

^bOf the 21 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^cIncludes the Coeur d'Alene, Kaniksu, and St. Joe National Forests.

**Appendix IV
Number of Projects and Acres by Type of
Environmental Analysis and National Forest
(Calendar Years 2003 through 2005)**

Table 9: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 2 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Arapaho-Roosevelt ^a	Colo.	2	2,515	9	38,665	10	1,560	21	42,740
Bighorn	Wyo.	1	1,860	4	2,860	6	792	11	5,512
Black Hills	S.D., Wyo.	4 ^b	42,492	10 ^c	19,247	28 ^d	8,008	42	69,747
Grand Mesa, Uncompahgre, and Gunnison ^e	Colo.	0	0	9 ^f	5,909	10	5,655	19	11,564
Medicine Bow-Routt ^g	Colo., Wyo.	3	10,008	6	11,455	11 ^h	5,716	20	27,179
National Forests of Nebraska ⁱ	Neb.	0	0	2	7,344	1	650	3	7,994
Pike and San Isabel ^j	Colo.	1	20,170	4	42,500	17	14,002	22	76,672
Rio Grande	Colo.	1	1,556	1	550	8	7,261	10	9,367
San Juan	Colo.	1	3,380	7	17,950	29	17,622	37	38,952
Shoshone	Wyo.	0	0	3	19,091	10	22,617	13	41,708
White River	Colo.	1	891	8	5,761	23 ^k	32,971	32	39,623
Total		14	82,872	63	171,332	153	116,854	230	371,058

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Arapaho and Roosevelt National Forests.

^bOf the four projects, one had no acreage or unknown acreage, according to the Forest Service.

^cOf the 10 projects, 5 had no acreage or unknown acreage, according to the Forest Service.

^dOf the 28 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^eIncludes the Grand Mesa, Uncompahgre, and Gunnison National Forests.

^fOf the nine projects, two had no acreage or unknown acreage, according to the Forest Service.

^gIncludes the Medicine Bow and Routt National Forests.

^hOf the 11 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

ⁱIncludes the Nebraska and Samuel R. McKelvie National Forests.

^jIncludes the Pike and San Isabel National Forests.

^kOf the 23 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

**Appendix IV
Number of Projects and Acres by Type of
Environmental Analysis and National Forest
(Calendar Years 2003 through 2005)**

Table 10: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 3 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Apache-Sitgreaves ^a	Ariz., N.M.	1	41,059	3	38,786	17 ^b	15,030	21	94,875
Carson	N.M.	2 ^c	51	7	10,609	13	8,284	22	18,944
Cibola	N.M.	0	0	1	50,615	21 ^d	55,940	22	106,555
Coconino	Ariz.,	1	6,229	5	16,753	14	26,448	20	49,430
Coronado	Ariz., N.M.	0	0	0	0	10 ^e	4,604	10	4,604
Gila	N.M.	0	0	3	35,261	20 ^f	11,300	23	46,561
Kaibab	Ariz.	0	0	7	102,337	19	21,293	26	123,630
Lincoln	N.M.	0	0	4	212,163	31	14,191	35	226,354
Prescott	Ariz.	0	0	2	69,700	6 ^g	2,669	8	72,369
Santa Fe	N.M.	1 ^h	0	4	13,437	27 ⁱ	18,072	32	31,509
Tonto	Ariz.	0	0	4	145,560	14	83,848	18	229,408
Total		5	47,339	40	695,221	192	261,679	237	1,004,239

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Apache and Sitgreaves National Forests.

^bOf the 17 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^cOf the two projects, one had no acreage or unknown acreage, according to the Forest Service.

^dOf the 21 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^eOf the 10 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^fOf the 20 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^gOf the six projects, one had no acreage or unknown acreage, according to the Forest Service.

^hThe Forest Service reported the project had no acreage or unknown acreage.

ⁱOf the 27 projects, the Forest Service reported 2 had no acreage or unknown acreage, according to the Forest Service.

**Appendix IV
Number of Projects and Acres by Type of
Environmental Analysis and National Forest
(Calendar Years 2003 through 2005)**

Table 11: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 4 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Ashley	Utah, Wyo.	1	2,066	1	50	7	11,012	9	13,128
Boise	Idaho	2	5,495	10	25,564	26	17,109	38	48,168
Bridger-Teton ^a	Wyo.	1	2,032	2	610	19	18,113	22	20,755
Caribou-Targhee ^b	Idaho, Utah, Wyo.	2	2,827	8	15,364	10	5,817	20	24,008
Dixie	Utah	3	17,635	5	16,157	11	4,894	19	38,686
Fishlake	Utah	0	0	1	7,300	13	16,079	14	23,379
Humboldt-Toiyabe ^c	Calif., Nev.	0	0	2	5,910	22 ^d	13,620	24	19,530
Manti-La Sal	Colo., Utah	1	24,600	0	0	11	8,178	12	32,778
Payette	Idaho	10	18,265	3 ^e	688	17	14,513	30	33,466
Salmon-Challis ^f	Idaho	0	0	5	18,496	10	9,084	15	27,580
Sawtooth	Idaho, Utah	0	0	2	2,865	11	10,833	13	13,698
Uinta	Utah	0	0	1	285	8	862	9	1,147
Wasatch-Cache	Idaho, Utah, Wyo.	2	1,471	2	335	10	11,050	14	12,856
Total		22	74,391	42	93,624	175	141,164	239	309,179

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Bridger and Teton National Forests.

^bIncludes the Caribou and Targhee National Forests.

^cIncludes the Humboldt and Toiyabe National Forests.

^dOf the 22 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^eOf the three projects, one had no acreage or unknown acreage, according to the Forest Service.

^fIncludes the Salmon and Challis National Forests.

Appendix IV
Number of Projects and Acres by Type of
Environmental Analysis and National Forest
(Calendar Years 2003 through 2005)

Table 12: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 5 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Angeles	Calif.	0	0	0	0	4 ^a	569	4	569
Cleveland	Calif.	0	0	0	0	18 ^b	15,997	18	15,997
Eldorado	Calif., Nev.	2	12,818	3	4,785	18	13,393	23	30,996
Inyo	Calif., Nev.	0	0	0	0	12	2,963	12	2,963
Klamath	Calif., Ore.	1	1,056	9	18,606	31 ^c	30,049	41	49,711
Lassen	Calif.	1	10,376	7 ^d	18,581	18 ^e	8,420	26	37,377
Los Padres	Calif.	0	0	0	0	5	20,314	5	20,314
Mendocino	Calif.	0	0	3	1,335	22	15,499	25	16,834
Modoc	Calif.	1	9,275	3	3,162	5	10,958	9	23,395
Plumas	Calif.	4	18,421	5 ^f	15,556	13	2,815	22	36,792
San Bernardino	Calif.	0	0	0	0	22 ^g	22,907	22	22,907
Sequoia	Calif.	1	4,900	3	2,715	11 ^h	10,475	15	18,090
Shasta-Trinity ⁱ	Calif.	0	0	10	11,354	23	18,891	33	30,245
Sierra	Calif.	1	960	3	1,175	18	8,539	22	10,674
Six Rivers	Calif.	0	0	3	802	12	5,578	15	6,380
Stanislaus	Calif.	1	13,306	3	10,712	29 ^j	6,153	33	30,171
Tahoe	Calif.	2	16,243	10	19,648	21 ^k	3,985	33	39,876
Total		14	87,355	62	108,431	282	197,505	358	393,291

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aOf the four projects, one had no acreage or unknown acreage, according to the Forest Service.

^bOf the 18 projects, 3 had no acreage or unknown acreage, according to the Forest Service.

^cOf the 31 projects, 7 had no acreage or unknown acreage, according to the Forest Service.

^dOf the seven projects, two had no acreage or unknown acreage, according to the Forest Service.

^eOf the 18 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^fOf the five projects, one had no acreage or unknown acreage, according to the Forest Service.

^gOf the 22 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^hOf the 11 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

ⁱIncludes the Shasta and Trinity National Forests.

^jOf the 29 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^kOf the 21 projects, 7 had no acreage or unknown acreage, according to the Forest Service.

**Appendix IV
Number of Projects and Acres by Type of
Environmental Analysis and National Forest
(Calendar Years 2003 through 2005)**

Table 13: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 6 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Colville	Wash.	4	8,642	2	4,060	19	15,286	25	27,988
Deschutes	Ore.	5	33,738	4	22,613	29 ^a	21,299	38	77,650
Fremont-Winema ^b	Ore.	1	22,982	7	32,134	31 ^c	73,273	39	128,389
Gifford Pinchot	Wash.	1	640	2	693	5	20,999	8	22,332
Malheur	Ore.	4	47,035	1	12,000	15 ^d	8,060	20	67,095
Mount Baker-Snoqualmie ^e	Wash.	0	0	2	274	2	1,045	4	1,319
Mount Hood	Ore.	1	550	7 ^f	2,537	13	21,005	21	24,092
Ochoco	Ore.	2	38,308	2	323	17	15,005	21	53,636
Okanogan-Wenatchee ^g	Wash.	1	200	12	68,374	29	47,874	42	116,448
Olympic	Wash.	0	0	5	2,295	7 ^h	2,195	12	4,490
Rogue River-Siskiyou ⁱ	Calif., Ore.	2	66,184	4 ^j	1,121	18 ^k	4,220	24	71,525
Siuslaw	Ore.	0	0	3	5,581	5	2,195	8	7,776
Umatilla	Ore., Wash.	4 ^l	53,540	7	19,857	32	12,508	43	85,905
Umpqua	Ore.	2	2,363	5 ^m	5,737	26 ⁿ	15,679	33	23,779
Wallowa-Whitman ^o	Idaho, Ore.	1	746	9	40,269	26	23,098	36	64,113
Willamette	Ore.	0	0	16 ^p	5,157	47 ^q	18,619	63	23,776
Total		28	274,928	88	223,025	321	302,360	437	800,313

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aOf the 29 projects, 3 had no acreage or unknown acreage, according to the Forest Service.

^bIncludes the Fremont and Winema National Forests.

^cOf the 31 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^dOf the 15 projects, 5 had no acreage or unknown acreage, according to the Forest Service.

^eIncludes the Mount Baker and Snoqualmie National Forests.

^fOf the seven projects, two had no acreage or unknown acreage, according to the Forest Service.

^gIncludes the Okanogan and Wenatchee National Forests.

^hOf the seven projects, one had no acreage or unknown acreage, according to the Forest Service.

ⁱIncludes the Rogue River and Siskiyou National Forests.

^jOf the four projects, one had no acreage or unknown acreage, according to the Forest Service.

^kOf the 18 projects, 5 had no acreage or unknown acreage, according to the Forest Service.

^lOf the four projects, one had no acreage or unknown acreage, according to the Forest Service.

^mOf the five projects, one had no acreage or unknown acreage, according to the Forest Service.

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^aOf the 26 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^bIncludes the Wallowa and Whitman National Forests.

^cOf the 16 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^dOf the 47 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

Table 14: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 8 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
National Forests of Alabama ^a	Ala.	3 ^b	0	8 ^c	21,276	34 ^d	103,572	45	124,848
Caribbean	P.R.	0	0	0	0	0	0	0	0
Chattahoochee-Oconee ^e	Ga.	0	0	6 ^f	16,669	19	22,323	25	38,992
Cherokee	N.C., Tenn.,	0	0	5	2,977	43	43,981	48	46,958
Daniel Boone	Ky.	0	0	1	44	14	33,255	15	33,299
National Forests of Florida ^g	Fla.	0	0	18 ^h	20,624	32	559,965	50	580,589
Francis Marion and Sumter ⁱ	S.C.	0	0	15 ^j	55,278	25	206,542	40	261,820
George Washington-Jefferson ^k	Ky., Va., W.Va.	0	0	35	66,705	48	27,979	83	94,684
Kisatchie	La.	1	21,000	25	214,517	57	27,068	83	262,585
National Forests of Mississippi ^l	Miss.	0	0	38 ^m	83,595	107 ⁿ	267,683	145	351,278
National Forests of North Carolina ^o	N.C.	0	0	25 ^p	13,958	32	12,898	57	26,856
Ouachita	Ark., Okla.	0	0	44 ^q	296,175	119 ^r	101,198	163	397,373
Ozark-St. Francis ^s	Ark.	0	0	22	93,845	46	104,681	68	198,526
National Forests of Texas ^t	Tex.	0	0	7	29,740	57 ^u	97,828	64	127,568
Total		4	21,000	249	915,403	633	1,608,973	886	2,545,376

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the William B. Bankhead, Conecuh, Talladega, and Tuskegee National Forests.

^bThe Forest Service reported that the three projects had no acreage or unknown acreage.

^cOf the eight projects, three had no acreage or unknown acreage, according to the Forest Service.

^dOf the 34 projects, 6 had no acreage or unknown acreage, according to the Forest Service.

^eIncludes the Chattahoochee and Oconee National Forests.

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(Calendar Years 2003 through 2005)

^fOf the six projects, two had no acreage or unknown acreage, according to the Forest Service.

^gIncludes the Apalachicola, Choctawhatchee, Ocala, and Osceola National Forests.

^hOf the 18 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

ⁱIncludes the Francis Marion and Sumter National Forests.

^jOf the 15 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^kIncludes the George Washington and Jefferson National Forests.

^lIncludes the Bienville, Delta, De Soto, Holly Springs, Homochitto, and Tombigbee National Forests.

^mOf the 38 projects, 6 had no acreage or unknown acreage, according to the Forest Service.

ⁿOf the 107 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^oIncludes the Nantahala, Pisgah, Croatan, and Uwharrie National Forests.

^pOf the 25 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^qOf the 44 projects, 4 had no acreage or unknown acreage, according to the Forest Service.

^rOf the 119 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^sIncludes the Ozark and St. Francis National Forests.

^tIncludes the Angelina, Davy Crockett, Sabine, and Sam Houston National Forests.

^uOf the 57 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

**Appendix IV
Number of Projects and Acres by Type of
Environmental Analysis and National Forest
(Calendar Years 2003 through 2005)**

Table 15: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 9 National Forests (Calendar Years 2003 through 2005)

National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Allegheny	Pa.	4	13,240	6	2,667	24	3,741	34	19,648
Chequamegon-Nicolet ^a	Wis.	6	49,457	8 ^b	12,084	34 ^c	7,391	48	68,932
Chippewa	Minn.	0	0	10	28,698	6	1,272	16	29,970
Green Mountain and Finger Lakes ^d	N.Y., Vt.	1	840	2	574	8	2,982	11	4,396
Hiawatha	Mich.	1	2,425	9	41,114	5	739	15	44,278
Hoosier	Ind.	0	0	1	1,436	4 ^e	1,089	5	2,525
Huron-Manistee ^f	Mich.	0	0	29	30,771	23	5,120	52	35,891
Mark Twain	Mo.	1	9,000	9	49,697	39	39,641	49	98,338
Monongahela	W.Va.	0	0	2	1,447	6	1,697	8	3,144
Ottawa	Mich.	1	5,525	5	19,276	3	474	9	25,275
Shawnee	Ill.	0	0	1	2,640	1	1,218	2	3,858
Superior	Minn.	2	14,256	6	16,025	5 ^g	294	13	30,575
Wayne	Ohio	0	0	1	4,981	11	5,464	12	10,445
White Mountain	Maine, N.H.	0	0	15	10,856	7	1,665	22	12,521
Total		16	94,743	104	222,266	176	72,787	296	389,796

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Chequamegon and Nicolet National Forests.

^bOf the eight projects, one had no acreage or unknown acreage, according to the Forest Service.

^cOf the 34 projects, 3 had no acreage or unknown acreage, according to the Forest Service.

^dIncludes the Green Mountain and Finger Lakes National Forests.

^eOf the four projects, one had no acreage or unknown acreage, according to the Forest Service.

^fIncludes the Huron and Manistee National Forests.

^gOf the five projects, one had no acreage or unknown acreage, according to the Forest Service.

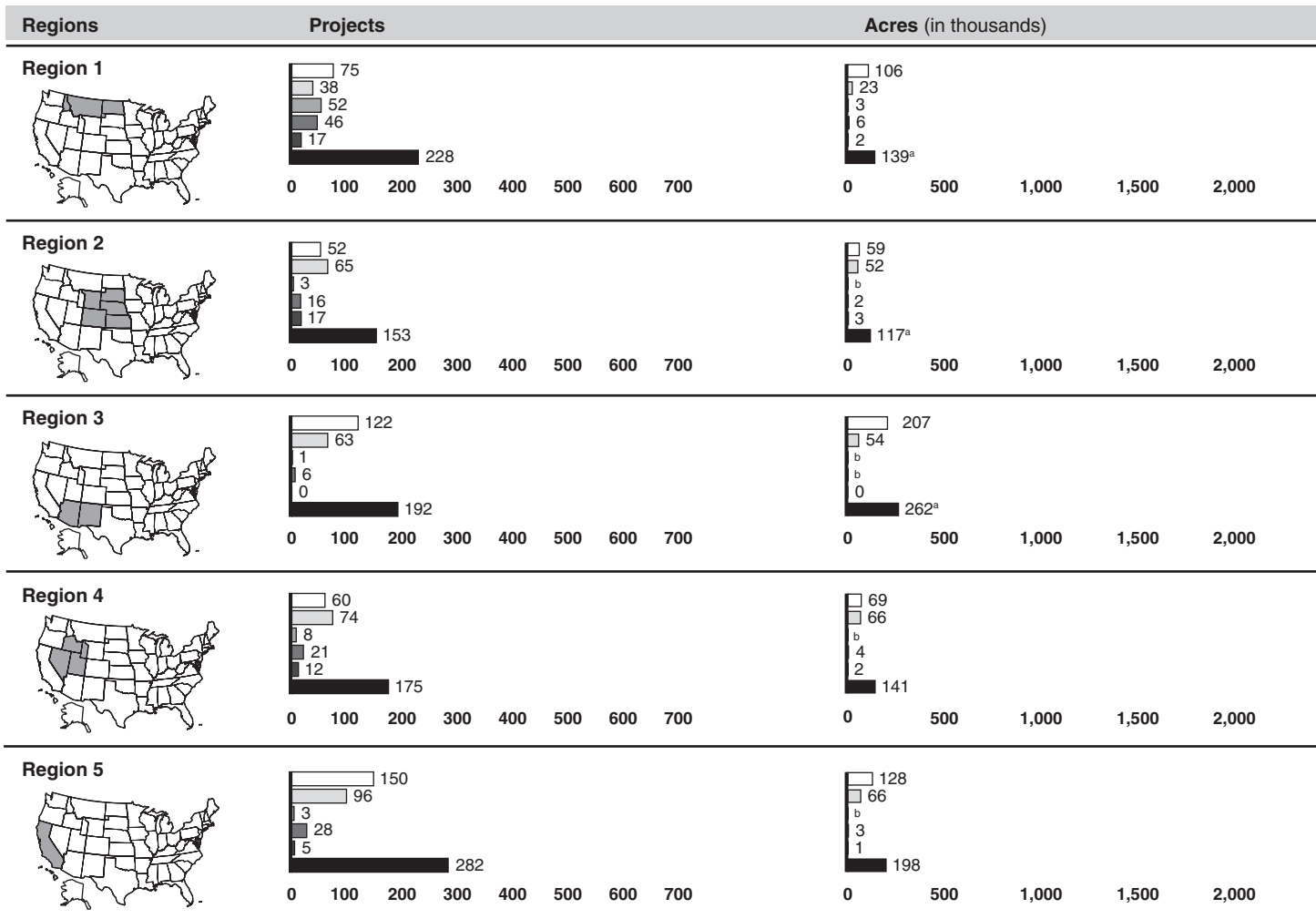
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Table 16: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Environmental Analyses, by Region 10 National Forests (Calendar Years 2003 through 2005)

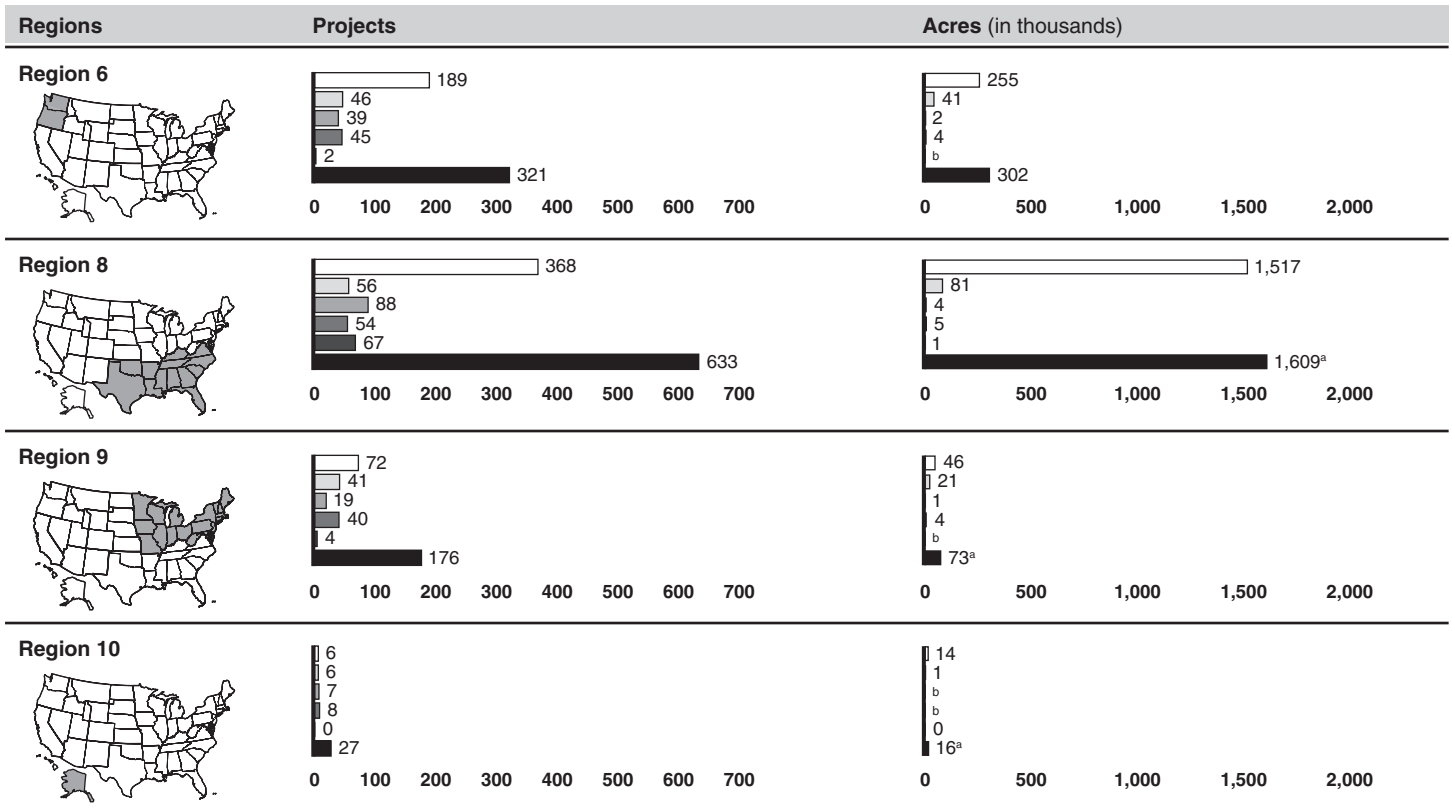
National forest	State	Environmental impact statement		Environmental assessment		Categorical exclusion		Total	
		Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
Chugach	Alaska	0	0	0	0	7	1,657	7	1,657
Tongass	Alaska	10	10,259	9	4,253	20	14,105	39	28,617
Total		10	10,259	9	4,253	27	15,762	46	30,274

Source: GAO.

Number of Projects and Acres by Type of Categorical Exclusion and Forest Service Region (Calendar Years 2003 through 2005)



**Appendix V
Number of Projects and Acres by Type of
Categorical Exclusion and Forest Service
Region (Calendar Years 2003 through 2005)**



Source: GAO.

Notes: Of the 2,187 vegetation management projects approved using a categorical exclusion, 71 had no acreage or 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. In addition, the Forest Service indicated for 38 projects that, in addition to the categorical exclusion cited as being used, one or more of the remaining four categorical exclusions were also used. We only counted the first categorical exclusion cited.

^aNumbers do not add to total due to rounding.

^bFewer than 500 acres.

Number of Projects and Acres by Type of Categorical Exclusion and National Forest (Calendar Years 2003 through 2005)

Table 17: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 1 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Beaverhead-Deerlodge ^a	Mont.	7 ^b	2,235
Bitterroot	Idaho, Mont.	11 ^c	7,600
Clearwater	Idaho	5	46,123
Custer	Mont., S.D.	9 ^e	5,920
Flathead	Mont.	3	911
Gallatin	Mont.	2	6,475
Helena	Mont.	3	330
Idaho Panhandle ⁱ	Idaho, Mont., Wash.	5	6,618
Kootenai	Idaho, Mont.	11	11,020
Lewis and Clark	Mont.	1	500
Lolo	Mont.	10	9,047
Nez Perce	Idaho	8	9,414
Total		75	106,193

**Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)**

Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
0	0	8	436	3	438	3	620	21	3,729
0	0	7	263	9 ^d	1,554	1	121	28	9,538
0	0	3	191	1	191	0	0	9	46,505
3 ^f	3,234	0	0	0	0	0	0	12	9,154
4 ^g	4,568	0	0	2	122	0	0	9	5,601
0	0	2	23	4	43	1	25	9	6,566
3	1,372	2 ^h	42	4	511	0	0	12	2,255
13	4,361	15 ⁱ	750	9	934	1	100	43	12,763
4	4,639	13	705	5	598	3 ^k	334	36	17,296
4	1,713	0	0	1 ^l	70	1	250	7	2,533
7	2,926	1	70	7	969	6	533	31	13,545
0	0	1	41	1 ^m	198	1	250	11	9,903
38	22,813	52	2,521	46	5,628	17	2,233	228	139,388

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Beaverhead and Deerlodge National Forests.

^bOf the seven projects, one had no acreage or unknown acreage, according to the Forest Service.

^cOf the 11 projects, 4 also used the categorical exclusion for hazardous fuels reduction, and 1 also used the categorical exclusion for the limited timber harvest of live trees, according to the Forest Service.

^dOf the nine projects, three projects also used the categorical exclusion for the removal of insect- or disease-infested trees, according to the Forest Service.

^eOf the nine projects, one also used the categorical exclusion for hazardous fuels reduction, according to the Forest Service.

^fOf the three projects, one also used the categorical exclusion for the salvage of dead or dying trees, according to the Forest Service.

^gOf the four projects, one also used the categorical exclusion for improving timber stands or wildlife habitat, according to the Forest Service.

^hOf the two projects, one also used the categorical exclusion for hazardous fuels reduction, according to the Forest Service.

ⁱIncludes the Coeur d'Alene, Kaniksu, and St. Joe National Forests.

^jOf the 15 projects, one also used the categorical exclusion for improving timber stands or wildlife habitat, according to the Forest Service.

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^kOf the three projects, one also used the categorical exclusion for the limited timber harvest of live trees, according to the Forest Service.

^lThe Forest Service indicated that the project also used the categorical exclusion for the removal of insect- or disease-infested trees.

^mThe Forest Service indicated that the project also used the categorical exclusion for the limited timber harvest of live trees.

**Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)**

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Appendix VI
Number of Projects and Acres by Type of
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(Calendar Years 2003 through 2005)

Table 18: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 2 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Arapaho-Roosevelt ^a	Colo.	2	87
Bighorn	Wyo.	3	232
Black Hills	S.D., Wyo.	6	1,263
Grand Mesa, Uncompahgre, and Gunnison ^c	Colo.	6	3,695
Medicine Bow-Routt ^d	Colo., Wyo.	5 ^e	4,260
National Forests of Nebraska ^f	Neb.	0	0
Pike and San Isabel ^g	Colo.	4	303
Rio Grande	Colo.	3	3,900
San Juan	Colo.	11	4,196
Shoshone	Wyo.	5 ⁱ	13,051
White River	Colo.	7 ^j	28,114
Total		52	59,101

**Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)**

Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
4	1,219	1	56	2	196	1	2	10	1,560
1	120	0	0	1	250	1	190	6	792
10 ^b	3,933	1	70	2	500	9	2,242	28	8,008
2	1,651	0	0	1	121	1	188	10	5,655
3	1,071	1	70	1	100	1	215	11	5,716
1	650	0	0	0	0	0	0	1	650
13	13,699	0	0	0	0	0	0	17	14,002
3	3,000	0	0	1	241	1	120	8	7,261
16 ^h	13,016	0	0	2	410	0	0	29	17,622
5	9,566	0	0	0	0	0	0	10	22,617
7	3,867	0	0	6 ^k	617	3	373	23	32,971
65	51,792	3	196	16	2,435	17	3,330	153	116,854

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Arapaho and Roosevelt National Forests.

^bOf the 10 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^cIncludes the Grand Mesa, Uncompahgre, and Gunnison National Forests.

^dIncludes the Medicine Bow and Routt National Forests.

^eOf the five projects, two had no acreage or unknown acreage and two also used the categorical exclusion for hazardous fuels reduction, according to the Forest Service.

^fIncludes the Nebraska and Samuel R. McKelvie National Forests.

^gIncludes the Pike and San Isabel National Forests.

^hOf the 16 projects, 1 also used the categorical exclusion for the limited timber harvest of live trees, according to the Forest Service.

ⁱOf the five projects, one also used the categorical exclusion for the removal of insect- or disease-infested trees, according to the Forest Service.

^jOf the seven projects, one also used the categorical exclusion for the salvage of dead or dying trees, according to the Forest Service.

^kOf the six projects, one had no acreage or unknown acreage and two also used the categorical exclusion for the removal of insect- or disease-infested trees, according to the Forest Service.

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Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
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Table 19: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 3 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Apache-Sitgreaves ^a	Ariz., N.M.	8 ^b	4,867
Carson	N.M.	7	5,435
Cibola	N.M.	11 ^c	47,182
Coconino	Ariz.,	9	20,672
Coronado	Ariz., N.M.	3 ^d	1,420
Gila	N.M.	7	5,237
Kaibab	Ariz.	14	17,345
Lincoln	N.M.	29	9,916
Prescott	Ariz.	3 ^f	900
Santa Fe	N.M.	22 ^g	16,430
Tonto	Ariz.	9	78,050
Total		122	207,454

**Appendix VI
Number of Projects and Acres by Type of
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(Calendar Years 2003 through 2005)**

Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
9	10,163	0	0	0	0	0	0	17	15,030
6	2,849	0	0	0	0	0	0	13	8,284
9	8,668	0	0	1	90	0	0	21	55,940
5	5,776	0	0	0	0	0	0	14	26,448
5	3,000	0	0	2	184	0	0	10	4,604
13 ^e	6,063	0	0	0	0	0	0	20	11,300
3	3,844	0	0	2	104	0	0	19	21,293
2	4,275	0	0	0	0	0	0	31	14,191
3	1,769	0	0	0	0	0	0	6	2,669
3	1,600	1	22	1	20	0	0	27	18,072
5	5,798	0	0	0	0	0	0	14	83,848
63	53,805	1	22	6	398	0	0	192	261,679

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Apache and Sitgreaves National Forests.

^bOf the 8 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^cOf the 11 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^dOf the three projects, one had no acreage or unknown acreage, according to the Forest Service.

^eOf the 13 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^fOf the three projects, one had no acreage or unknown acreage, according to the Forest Service.

^gOf the 22 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
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Table 20: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 4 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Ashley	Utah, Wyo.	2	4,212
Boise	Idaho	12	12,561
Bridger-Teton ^b	Wyo.	6	8,225
Caribou-Targhee ^c	Idaho, Utah, Wyo.	4	838
Dixie	Utah	4	3,769
Fishlake	Utah	7	9,348
Humboldt-Toiyabe ^d	Calif., Nev.	8	2,248
Manti-La Sal	Colo., Utah	1	300
Payette	Idaho	3	4,394
Salmon-Challis ^f	Idaho	2	8,282
Sawtooth	Idaho, Utah	5	5,993
Uinta	Utah	3	86
Wasatch-Cache	Idaho, Utah, Wyo.	3	9,100
Total		60	69,356

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Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
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Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
4	6,700	0	0	0	0	1	100	7	11,012
8	3,805	1	59	5 ^a	684	0	0	26	17,109
10	9,745	0	0	0	0	3	143	19	18,113
4	4,711	0	0	2	268	0	0	10	5,817
4	478	0	0	1	167	2	480	11	4,894
3	6,210	0	0	0	0	3	521	13	16,079
12 ^e	11,179	1	69	1	124	0	0	22	13,620
6	7,049	0	0	4	829	0	0	11	8,178
7	9,214	4	270	3	635	0	0	17	14,513
3	345	2	76	3	381	0	0	10	9,084
4	4,340	0	0	2	500	0	0	11	10,833
3	386	0	0	0	0	2	390	8	862
6	1,705	0	0	0	0	1	245	10	11,050
74	65,867	8	474	21	3,588	12	1,879	175	141,164

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aOf the five projects, one also used the categorical exclusion for the removal of insect- or disease-infested trees, according to the Forest Service.

^bIncludes the Bridger and Teton National Forests.

^cIncludes the Caribou and Targhee National Forests.

^dIncludes the Humboldt and Toiyabe National Forests.

^eOf the 12 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^fIncludes the Salmon and Challis National Forests.

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Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
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Table 21: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 5 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Angeles	Calif.	2 ^a	267
Cleveland	Calif.	9 ^b	10,574
Eldorado	Calif., Nev.	9	4,653
Inyo	Calif., Nev.	7	1,265
Klamath	Calif., Ore.	18 ^d	19,721
Lassen	Calif.	10 ^f	5,167
Los Padres	Calif.	4	19,614
Mendocino	Calif.	14	6,974
Modoc	Calif.	3	10,550
Plumas	Calif.	6	671
San Bernardino	Calif.	12 ^h	14,558
Sequoia	Calif.	5	8,230
Shasta-Trinity ^k	Calif.	7	9,461
Sierra	Calif.	16	8,195
Six Rivers	Calif.	6	3,443
Stanislaus	Calif.	11	1,138
Tahoe	Calif.	11 ⁿ	3,122
Total		150	127,603

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Number of Projects and Acres by Type of
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Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
1	102	0	0	0	0	1	200	4	569
8 ^c	5,399	0	0	1	24	0	0	18	15,997
8	8,490	0	0	1	250	0	0	18	13,393
3	1,356	0	0	1	250	1	92	12	2,963
11 ^e	10,038	1	40	0	0	1	250	31	30,049
6	3,047	0	0	2	206	0	0	18	8,420
1	700	0	0	0	0	0	0	5	20,314
4	7,755	0	0	4	770	0	0	22	15,499
0	0	0	0	2 ^g	408	0	0	5	10,958
5	2,138	1	5	1	1	0	0	13	2,815
10 ^j	8,349	0	0	0	0	0	0	22	22,907
6 ^j	2,245	0	0	0	0	0	0	11	10,475
7	8,514	0	0	9 ^l	916	0	0	23	18,891
2	344	0	0	0	0	0	0	18	8,539
3	1,926	0	0	3	209	0	0	12	5,578
15 ^m	4,707	0	0	3	308	0	0	29	6,153
6 ^o	817	1 ^p	0	1 ^q	0	2	46	21	3,985
96	65,927	3	45	28	3,342	5	588	282	197,505

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aOf the two projects, one had no acreage or unknown acreage, according to the Forest Service.

^bOf the nine projects, two had no acreage or unknown acreage, according to the Forest Service.

^cOf the eight projects, one had no acreage or unknown acreage, according to the Forest Service.

^dOf the 18 projects, 3 had no acreage or unknown acreage, according to the Forest Service.

^eOf the 11 projects, 4 had no acreage or unknown acreage, according to the Forest Service.

^fOf the 10 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^gOf the two projects, one also used the categorical exclusion for the limited timber harvest of live trees, according to the Forest Service.

^hOf the 12 projects, 1 had no acreage or unknown acreage and 1 also used the categorical exclusion for hazardous fuels reduction, according to the Forest Service.

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^lOf the 10 projects, 1 also used the categorical exclusion for improving timber stands or wildlife habitat, according to the Forest Service.

ⁱOf the six projects, one had no acreage or unknown acreage, according to the Forest Service.

^kIncludes the Shasta and Trinity National Forests.

^lOf the nine projects, one also used the categorical exclusion for the limited timber harvest of live trees, according to the Forest Service.

^mOf the 15 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

ⁿOf the 11 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^oOf the six projects, three had no acreage or unknown acreage, according to the Forest Service.

^pThe Forest Service reported the project had no acreage or unknown acreage.

^qThe Forest Service reported the project had no acreage or unknown acreage.

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Appendix VI
Number of Projects and Acres by Type of
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Table 22: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 6 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Colville	Wash.	8	5,786
Deschutes	Ore.	18	20,522
Fremont-Winema ^b	Ore.	26 ^c	72,266
Gifford Pinchot	Wash.	4	20,930
Malheur	Ore.	8 ^d	3,170
Mount Baker-Snoqualmie ^e	Wash.	1	1,029
Mount Hood	Ore.	2	18,793
Ochoco	Ore.	10	5,377
Okanogan-Wenatchee ^f	Wash.	20	47,293
Olympic	Wash.	6 ^g	2,145
Rogue River-Siskiyou ^h	Calif., Ore.	10 ⁱ	3,561
Siuslaw	Ore.	2	2,080
Umatilla	Ore., Wash.	11	8,736
Umpqua	Ore.	16	14,861
Wallowa-Whitman ^m	Idaho, Ore.	13	10,272
Willamette	Ore.	34	18,397
Total		189	255,218

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Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
6	9,036	3	210	2	254	0	0	19	15,286
7 ^a	291	1	70	3	416	0	0	29	21,299
3	707	1	70	1	230	0	0	31	73,273
0	0	1	69	0	0	0	0	5	20,999
2	4,464	3	203	2	223	0	0	15	8,060
0	0	0	0	1	16	0	0	2	1,045
2	1,536	4	274	5	402	0	0	13	21,005
3	9,392	2	76	2	160	0	0	17	15,005
1	180	4	213	4	188	0	0	29	47,874
0	0	1	50	0	0	0	0	7	2,195
2	307	2	100	3 ^j	2	1	250	18	4,220
1	3	2	112	0	0	0	0	5	2,195
5	2,475	7 ^k	368	8	901	1	28	32	12,508
4 ^l	195	2	43	4	580	0	0	26	15,679
10	12,532	0	0	3 ⁿ	294	0	0	26	23,098
0	0	6	90	7 ^o	132	0	0	47	18,619
46	41,118	39	1,948	45	3,798	2	278	321	302,360

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aOf the seven projects, three had no acreage or unknown acreage, according to the Forest Service.

^bIncludes the Fremont and Winema National Forests.

^cOf the 26 projects, 2 had no acreage or unknown acreage, according to the Forest Service.

^dOf the eight projects, five had no acreage or unknown acreage, according to the Forest Service.

^eIncludes the Mount Baker and Snoqualmie National Forests.

^fIncludes the Okanogan and Wenatchee National Forests.

^gOf the six projects, one had no acreage or unknown acreage, according to the Forest Service.

^hIncludes the Rogue River and Siskiyou National Forests.

ⁱOf the 10 projects, 3 had no acreage or unknown acreage, according to the Forest Service.

^jOf the three projects, two had no acreage or unknown acreage, according to the Forest Service.

^kOf the seven projects, one also used the categorical exclusion for improving timber stands or wildlife habitat, according to the Forest Service.

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^lOf the four projects, one had no acreage or unknown acreage, according to the Forest Service.

^mIncludes the Wallowa and Whitman National Forests.

ⁿOf the three projects, one also used the categorical exclusion for the removal of insect- or disease-infested trees, according to the Forest Service.

^oOf the seven projects, one had no acreage or unknown acreage, according to the Forest Service.

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Table 23: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 8 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
National Forests of Alabama ^a	Ala.	24 ^b	100,860
Caribbean	P.R.	0	0
Chattahoochee-Oconee ^d	Ga.	15	22,115
Cherokee	N.C., Tenn.,	32 ^e	43,496
Daniel Boone	Ky.	12	33,132
National Forests of Florida ^g	Fla.	28	559,482
Francis Marion and Sumter ^h	S.C.	18	202,334
George Washington-Jefferson ⁱ	Ky., Va., W.Va.	40 ^j	27,598
Kisatchie	La.	35	22,438
National Forests of Mississippi ^k	Miss.	21	265,862
National Forests of North Carolina ⁿ	N.C.	16	9,130
Ouachita	Ark., Okla.	71	87,768
Ozark-St. Francis ^r	Ark.	19	55,231
National Forests of Texas ^s	Tex.	37 ^t	87,846
Total		368	1,517,292

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Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
3	2,199	4	178	2	335	1 ^c	0	34	103,572
0	0	0	0	0	0	0	0	0	0
0	0	4	208	0	0	0	0	19	22,323
0	0	9 ^f	390	2	95	0	0	43	43,981
0	0	0	0	2	123	0	0	14	33,255
3	283	0	0	1	200	0	0	32	559,965
4	4,041	3	167	0	0	0	0	25	206,542
0	0	4	228	3	151	1	2	48	27,979
5	3,529	9	444	8	657	0	0	57	27,068
1	400	20 ^l	977	5 ^m	297	60	147	107	267,683
4	3,060	6	140	4	503	2	65	32	12,898
17 ^o	10,447	6 ^p	223	25 ^q	2,760	0	0	119	101,198
17	48,565	7	337	0	0	3	548	46	104,681
2	8,905	16	1,027	2	50	0	0	57	97,828
56	81,429	88	4,319	54	5,171	67	762	633	1,608,973

Source: GAO.

Notes: In some instances, the acreage associated with a project decision 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.

^aIncludes the William B. Bankhead, Conecuh, Talladega, and Tuskegee National Forests.

^bOf the 24 projects, 5 had no acreage or unknown acreage, according to the Forest Service.

^cThe Forest Service reported the project had no acreage or unknown acreage.

^dIncludes the Chattahoochee and Oconee National Forests.

^eOf the 32 projects, 1 also used the categorical exclusion for hazardous fuels reduction, according to the Forest Service.

^fOf the nine projects, one also used the categorical exclusion for the salvage of dead or dying trees and one also used both the categorical exclusion for the salvage of dead or dying trees and for the removal of insect- or disease-infested trees, according to the Forest Service.

^gIncludes the Apalachicola, Choctawhatchee, Ocala, and Osceola National Forests.

^hIncludes the Francis Marion and Sumter National Forests.

ⁱIncludes the George Washington and Jefferson National Forests.

^jOf the 40 projects, 1 also used the categorical exclusion for hazardous fuels reduction, according to the Forest Service.

^kIncludes the Bienville, Delta, De Soto, Holly Springs, Homochitto, and Tombigbee National Forests.

Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)

^lOf the 20 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^mOf the five projects, one also used the categorical exclusion for improving timber stands or wildlife habitat, according to the Forest Service.

ⁿIncludes the Nantahala, Pisgah, Croatan, and Uwharrie National Forests.

^oOf the 17 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^pOf the six projects, one also used the categorical exclusion for improving timber stands or wildlife habitat, according to the Forest Service.

^qOf the 25 projects, 1 had no acreage or unknown acreage and 1 also used the categorical exclusion for the limited timber harvest of live trees, according to the Forest Service.

^rIncludes the Ozark and St. Francis National Forests.

^sIncludes the Angelina, Davy Crockett, Sabine, and Sam Houston National Forests.

^tOf the 37 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

**Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)**

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Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)

Table 24: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 9 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Allegheny	Pa.	3	2,090
Chequamegon-Nicolet ^a	Wis.	13 ^b	5,623
Chippewa	Minn.	2	23
Green Mountain and Finger Lakes ^d	N.Y., Vt.	5	2,876
Hiawatha	Mich.	1	20
Hoosier	Ind.	2 ^e	855
Huron-Manistee ^f	Mich.	14	1,959
Mark Twain	Mo.	16	24,788
Monongahela	W.Va.	5	1,692
Ottawa	Mich.	0	0
Shawnee	Ill.	1	1,218
Superior	Minn.	0	0
Wayne	Ohio	5	3,287
White Mountain	Maine, N.H.	5	1,609
Total		72	46,040

**Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)**

Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
1	4	0	0	20	1,647	0	0	24	3,741
4	571	11	543	5 ^c	564	1	90	34	7,391
3	1,232	1	17	0	0	0	0	6	1,272
1	25	0	0	1	51	1	30	8	2,982
2	420	0	0	1	249	1	50	5	739
0	0	0	0	2	234	0	0	4	1,089
5	2,652	0	0	4 ^g	509	0	0	23	5,120
19	13,875	0	0	4	978	0	0	39	39,641
0	0	1	5	0	0	0	0	6	1,697
2	456	0	0	0	0	1	18	3	474
0	0	0	0	0	0	0	0	1	1,218
1	55	1 ^h	0	3	239	0	0	5	294
3	2,027	3	150	0	0	0	0	11	5,464
0	0	2	56	0	0	0	0	7	1,665
41	21,317	19	771	40	4,471	4	188	176	72,787

Source: GAO.

Notes: In some instances, the acreage associated with a 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.

^aIncludes the Chequamegon and Nicolet National Forests.

^bOf the 13 projects, 1 had no acreage or unknown acreage, according to the Forest Service.

^cOf the five projects, two had no acreage or unknown acreage, according to the Forest Service.

^dIncludes the Green Mountain and Finger Lakes National Forests.

^eOf the two projects, one had no acreage or unknown acreage, according to the Forest Service.

^fIncludes the Huron and Manistee National Forests.

^gOf the four projects, one also used the categorical exclusion for improving timber stands or wildlife habitat, according to the Forest Service.

^hThe project acreage was reported as zero or unknown, according to the Forest Service.

Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)

Table 25: Number of Vegetation Management Projects Approved and Associated Acres for Different Types of Categorical Exclusions, by Region 10 National Forests (Calendar Years 2003 through 2005)

National forest	State	Improve timber stands or wildlife habitat (no acreage limitation)	
		Projects	Acres
Chugach	Alaska	1	179
Tongass	Alaska	5	13,752
Total		6	13,931

Appendix VI
Number of Projects and Acres by Type of
Categorical Exclusion and National Forest
(Calendar Years 2003 through 2005)

Hazardous fuels reduction (5,500-acre limitation)		Limited timber harvest of live trees (70-acre limitation)		Salvage of dead or dying trees (250-acre limitation)		Removal of insect- or disease-infested trees (250-acre limitation)		Total	
Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres	Projects	Acres
6	1,478	0	0	0	0	0	0	7	1,657
0	0	7	245	8	108	0	0	20	14,105
6	1,478	7	245	8	108	0	0	27	15,762

Source: GAO.

Primary Reasons for Not Using Different Vegetation Management Categorical Exclusions (Calendar Years 2003 through 2005)

Table 26: Primary Reasons Cited by 165 Ranger Districts for Not Using the Categorical Exclusion for Improving Timber Stands or Wildlife Habitat

Reason for not using the categorical exclusion	Number (percent of total)
No projects were undertaken to improve timber stand or wildlife habitat	61 (37.0)
Projects that fit the category have already been or will be included in an environmental assessment or environmental impact statement	59 (35.8)
Lack of internal Forest Service resources	26 (15.8)
District or forest preference to use an environmental assessment	5 (3.0)
Other	5 (3.0)
Projects required more than 1 mile of low standard road construction or roads of higher service level	3 (1.8)
Lack of commercial infrastructure	2 (1.2)
Other categorical exclusion used	2 (1.2)
Extraordinary circumstances	1 (0.6)
Previous court rulings	1 (0.6)
Concern project may be litigated	0 (0.0)
Internal Forest Service policy	0 (0.0)
Perceived public acceptability	0 (0.0)
Potential for significant impact of proposed projects on the environment	0 (0.0)
Projects required the use of herbicides	0 (0.0)
Total	165 (100)^a

Source: GAO.

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

Appendix VII
Primary Reasons for Not Using Different
Vegetation Management Categorical
Exclusions (Calendar Years 2003 through
2005)

Table 27: Primary Reasons Cited by 256 Ranger Districts for Not Using the Categorical Exclusion for Reducing Hazardous Fuels

Reason for not using the categorical exclusion	Number (percent of total)
Projects that fit the category have already been or will be included in an environmental assessment or environmental impact statement	62 (24.2)
Lack of wildland fire risk reduction plan	46 (18.0)
Lack of internal Forest Service resources	33 (12.9)
Size (acreage) of the proposed projects	22 (8.6)
Other categorical exclusion used	21 (8.2)
Other	19 (7.4)
Lack of hazardous fuels	13 (5.1)
Extraordinary circumstances	8 (3.1)
District or forest preference to use an environmental assessment	6 (2.3)
Projects required the use of pesticides, herbicides, or new permanent roads or infrastructure	6 (2.3)
Projects are not consistent with applicable procedures or land resource management plans	5 (2.0)
Location of proposed hazardous fuels reduction projects did not meet criteria	4 (1.6)
Potential for significant impact of proposed projects on the environment	3 (1.2)
Internal Forest Service policy	2 (0.8)
Perceived public acceptability	2 (0.8)
Previous court rulings	2 (0.8)
Lack of commercial infrastructure	2 (0.8)
Concern project may be litigated	0 (0.0)
Total	256 (100)^a

Source: GAO.

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

**Appendix VII
 Primary Reasons for Not Using Different
 Vegetation Management Categorical
 Exclusions (Calendar Years 2003 through
 2005)**

Table 28: Primary Reasons Cited by 353 Ranger Districts for Not Using the Categorical Exclusion for Salvaging Dead or Dying Trees

Reason for not using the categorical exclusion	Number (percent of total)
Lack of trees dead or dying as a result of wind, ice, or fire-related events	95 (26.9)
Projects that fit the category have already been or will be included in an environmental assessment or environmental impact statement	66 (18.7)
Have dead or dying trees, but other priorities precluded its use	47 (13.3)
Size (acreage) of the proposed project	36 (10.2)
Other	29 (8.2)
Lack of internal Forest Service resources	28 (7.9)
Lack of commercial infrastructure	16 (4.5)
Other categorical exclusion used	13 (3.7)
District or forest preference to use an environmental assessment	8 (2.3)
Concern project may be litigated	5 (1.4)
Extraordinary circumstances	5 (1.4)
Projects would require permanent road construction or more than one-half mile of temporary road construction	4 (1.1)
Potential for significant impact of proposed projects on the environment	1 (0.3)
Internal Forest Service policy	0 (0.0)
Perceived public acceptability	0 (0.0)
Previous court rulings	0 (0.0)
Total	353 (100)^a

Source: GAO.

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

**Appendix VII
 Primary Reasons for Not Using Different
 Vegetation Management Categorical
 Exclusions (Calendar Years 2003 through
 2005)**

Table 29: Primary Reasons Cited by 395 Ranger Districts for Not Using the Categorical Exclusion for Conducting Limited Timber Harvests of Live Trees

Reason for not using the categorical exclusion	Number (percent of total)
Size (acreage) of the proposed projects	110 (27.9)
Projects that fit the category have already been or will be included in an environmental assessment or environmental impact statement	100 (25.3)
Other	62 (15.7)
Lack of internal Forest Service resources	55 (13.9)
Lack of commercial infrastructure	21 (5.3)
Other categorical exclusion used	16 (4.1)
District or forest preference to use an environmental assessment	13 (3.3)
Extraordinary circumstances	7 (1.8)
Internal Forest Service policy	4 (1.0)
Projects would require permanent road construction or more than one-half mile of temporary road construction	4 (1.0)
Concern project may be litigated	2 (0.5)
Perceived public acceptability	1 (0.3)
Potential for significant impact of proposed projects on the environment	0 (0.0)
Previous court rulings	0 (0.0)
Total	395 (100)^a

Source: GAO.

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

**Appendix VII
 Primary Reasons for Not Using Different
 Vegetation Management Categorical
 Exclusions (Calendar Years 2003 through
 2005)**

Table 30: Primary Reasons Cited by 462 Ranger Districts for Not Using the Categorical Exclusion for the Removal of Insect- or Disease-Infested Trees

Reason for not using the categorical exclusion	Number (percent of total)
Lack of insect- or disease-infested trees	114 (24.7)
Projects that fit the category have already been or will be included in an environmental assessment or environmental impact statement	108 (23.4)
Have insect- or disease-infested trees, but other priorities precluded its use	88 (19.1)
Other	39 (8.4)
Lack of internal Forest Service resources	27 (5.8)
Size (acreage) of the proposed projects	27 (5.8)
Other categorical exclusion used	14 (3.0)
Lack of commercial infrastructure	14 (3.0)
Extraordinary circumstances	9 (2.0)
Perceived public acceptability	6 (1.3)
District or forest preference to use an environmental assessment	5 (1.1)
Internal Forest Service policy	5 (1.1)
Projects would require permanent road construction or more than one-half mile of temporary road construction	4 (0.9)
Concern project may be litigated	2 (0.4)
Potential for significant impact of proposed projects on the environment	0 (0.0)
Previous court rulings	0 (0.0)
Total	462 (100)^a

Source: GAO.

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

Comments from the U.S. Department of Agriculture

Note: GAO comments supplementing those in the report text appear at the end of this appendix.



United States
Department of
Agriculture

Forest
Service

Washington
Office

1400 Independence Avenue, SW
Washington, DC 20250

File Code: 1950/1420
Date: SEP 22 2006

Robin M. Nazzaro
Director, Natural Resources and Environment
U.S. General Accounting Office
441 G Street, N.W.
Washington, DC 20548

Dear Robin Nazzaro:

It is evident that GAO conducted a thorough study of the Agency's use of categorical exclusions for vegetation management projects approved during calendar years 2003 through 2005. Not only was data collected from all 155 national forests, representing 509 ranger districts, but GAO's efforts to pretest the data collection instrument, conduct site visits, and interview employees are noteworthy.

The Forest Service generally agrees with GAO's findings and observations, and specifically that it is premature to extrapolate trends given the studied categorical exclusions' limited period of use.

The Forest Service would additionally like to provide the following five clarifications.

1. **Applicability of categorical exclusions under NEPA and the role of the Council on Environmental Quality:** Expanding on footnote 3 (p. 7), NEPA established the Council on Environmental Quality, which is responsible for, among other things, issuing guidelines and reviewing agencies' policies and procedures to ensure compliance with the Act. The Council's regulations implementing NEPA appear at 40 CFR Parts 1500-1508. Categorical exclusions are a recognized tool for compliance with NEPA, as required by the Council's implementing regulations at 40 CFR 1507.3(b)(2)(ii) and 1508.4. In developing categorical exclusions, agencies must consult with and obtain a conformity determination from the Council for compliance with NEPA and the Council's implementing regulations (40 CFR 1507.3(a)).
2. **Documentation and analyses for categorical exclusions:** Expanding on discussions of analyses and documentation (pp. 7 and 11), the purpose of a categorical exclusion is to eliminate the need for unnecessary paperwork and effort under NEPA for categories of actions that normally do not warrant preparation of an environmental impact statement (EIS) or environmental assessment (EA) (40 CFR 1500.4(p) and 1500.5(k)). The Council's implementing regulations at 40 CFR Parts 1500-1508 do not specify analyses or documentation requirements for categorical exclusions. Furthermore, "(T)he Council believes that sufficient information will usually be available during the course of normal project development to determine the need for an EIS and further that the agency's administrative record will clearly document the basis for its decision. Accordingly, the Council strongly discourages procedures that would require the preparation of additional

See comment 1. Page numbers in the draft report may differ from those in the report.

See comment 2.



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paperwork to document that an activity has been categorically excluded.” (Council on Environmental Quality, “Guidance Regarding NEPA Regulations,” 48 FR 34263 (July 28, 1983), available at <http://www.nepa.gov/nepa/regs/1983/1983guid.htm>). As noted on page 11 of the report, the Forest Service requires limited documentation of the studied categorical exclusions in a decision memo and supporting file (Forest Service Handbook 1909.15 – Environmental Policy and Procedures, sections 32.2 and 32.3). As determined appropriate by the agency Responsible Official, the extent of project-specific analyses and documentation is related to the type of action involved, the potential for extraordinary circumstances, and compliance with other laws, regulations, and policies. For example, analyses are done to comply with the Endangered Species Act and the National Historic Preservation Act and are part of the supporting file, although they are not usually detailed in a decision memo.

See comment 3.

3. **Applicability of the 2005 Earth Island Institute court ruling:** Expanding on footnote 9 (p. 11), the 2005 Earth Island Institute court ruling applies only to categorically excluded timber sales and the following types of categorically excluded activities: A) Projects involving the use of prescribed burning; B) Projects involving the creation or maintenance of wildlife openings; C) The designation of travel routes for off-highway vehicle (OHV) use which is not conducted through the travel management planning process as part of the forest planning process; D) The construction of new OHV routes and facilities intended to support OHV use; E) The upgrading, widening, or modification of OHV routes to increase either the levels or types of use by OHVs (but not projects performed for the maintenance of existing routes); F) The issuance or reissuance of special use permits for OHV activities conducted on areas, trails, or roads that are not designated for such activities; G) Projects in which the cutting of trees for thinning or wildlife purposes occurs over an area greater than 5 contiguous acres; H) Gathering geophysical data using shorthole, vibroseis, or surface charge; I) Trenching to obtain evidence of mineralization; and J) Clearing vegetation for sight paths from areas used for mineral, energy, or geophysical investigation or support facilities for such activities.
4. **Applicability of the hazardous fuels categorical exclusion outside of the wildland urban interface:** Expanding upon the categorical exclusion descriptions in Table 1 (p. 10) and Table 7 (Appendix II, p. 29), use of the studied hazardous fuels categorical exclusion is restricted outside of the wildland urban interface to areas having Condition Classes 2 and 3 in Fire Regime Groups I, II, or III. Condition Class 2 is the condition class description under which: A) Fire regimes on the land have been moderately altered from historical ranges; B) A moderate risk exists of losing key ecosystem components from fire; C) Fire frequencies have increased or decreased from historical frequencies by one or more return intervals, resulting in moderate changes to the size, frequency, intensity, or severity of fires or landscape patterns; and D) vegetation attributes have been moderately altered from their historical ranges. Condition Class 3 is the condition class description under which: A) Fire regimes on land have been significantly altered from historical ranges; B) A high risk exists of losing key ecosystem components from fire; C) Fire frequencies have departed from historical frequencies by multiple return intervals, resulting in dramatic changes to the size, frequency, intensity, or severity of fires or landscape patterns and vegetation attributes have been significantly altered from their

See comment 4.

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historical ranges. Fire Regime I consists of an area that historically has had low-severity fires every 0 to 35 years and is located primarily in low-elevation forests of pine, oak, and pinyon-juniper. Fire Regime II consists of an area that historically has had stand-replacement-severity fires every 0 to 35 years and is located primarily in low- to mid-elevation rangeland, grassland, or shrubland. Fire Regime III consists of an area that historically has had mixed-severity fires every 35 to 100 years and is located primarily in forests of mixed conifer, dry Douglas fir, or wet ponderosa pine.

5. Vegetation management categorically excluded activities not included in study:
Expanding upon the discussion in Appendix I (pp. 25 to 26), the studied vegetation management projects do not include independently approved categorically excluded reforestation or rehabilitation activities.

Thank you for the opportunity to review and comment on the draft report. Questions on these comments may be directed to Joe Carbone, Assistant Director for NEPA, at 202-205-0884.

Sincerely,


DALE N. BOSWORTH
Chief

See comment 5.

GAO Comments

1. We have added language further explaining the Council on Environmental Quality's role in overseeing agencies' actions to implement the National Environmental Policy Act.
2. We have added language clarifying that, while decision memos may not include all of the analyses performed by the Forest Service in support of its decisions to use categorical exclusions, agency project files are to include such information.
3. We have added language expanding on the court's ruling on the nature of projects subject to public notice, comment, and appeal under the Appeals Reform Act.
4. We have added language further clarifying when the Forest Service can use the hazardous fuels reduction categorical exclusion.
5. We have added language specifically identifying the categorical exclusions for regeneration and postfire rehabilitation as ones that were not included in our scope and methodology.

GAO Contact and Staff Acknowledgments

GAO Contact

Robin M. Nazzaro, (202) 512-3841 or nazzaror@gao.gov

Staff Acknowledgments

In addition to the contact named above, David Bixler (Assistant Director), Nancy Bowser, Rich Johnson, Marcia Brouns McWreath, Matthew Reinhart, Jerry Sandau, Carol Herrnstadt Shulman, and Walter Vance made major contributions to this report.

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