

Informational Memoranda

SUBJECT: Timeframes for completing Environmental Assessments for Projects Previously Categorically Excluded under Category #4.

ISSUE: Loss of Category #4 for small timber sales has resulted in the need to prepare environmental assessments for these small sales. Concerns have been expressed that the timeframes associated with preparation of the EA are substantially greater than timeframes required to document a CE and prepare a Decision Memo.

BACKGROUND: In 1992 the Forest Service promulgated the list of Categorical Exclusions in Chapter 30 of the NEPA Handbook (1909.15). One of these categories was for small timber sales of less than 250,000 board-feet of green sale and 1 million board-feet of salvage. This CE was the only categorical exclusion subject to a 30 day public comment period and the subsequent administrative appeal process.

In 1999 the Forest Service lost the use of the small timber sale categorical exclusion (Heartwood I). With loss of this category, forests were instructed to prepare environmental assessments (EAs) or find another category for which a project could be placed. The Forests has operated under this policy for the last two years. However, quantitative information was not collected on specific projects to evaluate the time and cost implications associated with loss of the CE. Anecdotal information was collected.

INFORMATION:

Anecdotal information has been collected from the Regions that characterizes the impacts associated with loss of Category #4. Below are the results of this information.

- ? All Regions report that the number of small timber sale projects has declined. Either the projects have been deleted because it is not cost effective, or the project has been combined with other actions that require an environmental assessment.
- ? There has been an increase in the use of other categories to do some of this work.
- ? The required minimum timeframes for use of the timber sale CE was 2 ½ to 4 months. This does not include analysis time or documentation time for the decision memo.
- ? Timeframe impacts to prepare EAs versus CEs are estimated below by Region. Overall increases in planning time are perhaps 1 – 4 months.
 - ✍ Region 1 -- Variable, 1-3 months added, some sales moved to other categories
 - ✍ Region 2 -- Variable 1-4 months added
 - ✍ Region 3 -- Very little, were not using the CE for small sales
 - ✍ Region 4 -- Variable from 1-4 months, some sales moved to other categories
 - ✍ Region 5 -- Small impact from a few weeks to 1 month
 - ✍ Region 6 -- Very little, very limited use of the timber sale CE before the injunction
 - ✍ Region 8 -- Variable from 2-6 months, some sales moved to other categories
 - ✍ Region 9 -- Variable, but unknown
 - ✍ Region 10 -- limited, very little reliance on the CE