



Forest Service Carbon & Ecosystem Services Update

12.07.08

No one can do everything. Everyone can do something.

From Sierra Club's the Green Life. Cosmetics are often the most chemical-laden culprits in the beauty market, and they're applied directly to the face, one of the body's most sensitive and porous areas. And the chemicals aren't great for the environment, either. Try switching to organic cosmetics – many are available in local health/natural foods stores or online.

Thanks to Sherri Wormstead, Larry Rabin, Mark Buccowich, Phillip Rodbell, and all others who contributed articles!

News:

Rich, Poor in Dispute Over Rainforest Cash

Brazil ruled out on Thursday letting rich countries offset their greenhouse gas emissions by helping to save the Amazon rain forest, an idea under active discussion by the European Union.

<http://uk.news.yahoo.com/22/20081127/twl-environment-us-carbon-forests-1202b49.html>

Trees to Fight Warming? Insurers Ponder Risks

Paying landowners to let forests grow is promoted by the United Nations as a viable way to fight global warming, but experts first have to puzzle out how to insure trees against going up in smoke.

<http://www.planetark.org/enviro-news/item/50709>

Top Scientist Dismayed at Spending Imbalance on Climate, Poverty

The head of the world's top climate scientists says he is stunned at the trillion-dollar cheques that have been signed to ease the banking crisis when funding for poverty and global warming is scrutinised or denied

<http://www.grist.org/news/2008/12/02/spending/index.html?source=rss>

EU Agrees to Cut Car Emissions

European carmakers must cut global-warming gases from new vehicles by 18 percent within the next six years, the EU agreed on Monday, after a long battle between environmentalists and an industry facing tough times.

<http://www.reuters.com/article/environmentNews/idUSTRE4B06R920081201>

Brazil Sets Plan to Cut Deforestation by 70% over 10 years

The Brazilian government on Monday announced a plan under which it would cut deforestation of the Amazon by 70 percent over the next decade. It is the first time Brazil, home to the largest area of tropical woodland on the planet, has set a target for reducing the damage wreaked by illegal loggers and ranchers.

<http://www.grist.org/news/2008/12/01/deforestation/index.html?source=rss>

Clearing Forests for Biofuels Hurts Climate: Study

Clearing tropical forests to plant biofuels is a bad idea for the climate and reduces the diversity of animal and plant life, a study found on Monday.

<http://www.reuters.com/article/environmentNews/idUSTRE4B04CA20081201?feedType=RSS&feedName=environmentNews>

Forests Under Threat from Climate Change: Study

Global forests are extremely vulnerable to climate change that is set to bring more wildfires and floods and quick action is needed to aid millions of poor people who depend on forests, a study said on Thursday.

<http://www.reuters.com/article/environmentNews/idUSTRE4AQ7EN20081127?feedType=RSS&feedName=environmentNews>

News from Climate Talks in Poznan, Poland (Dec 1-12, 2008):

Obama Climate Goals Not Enough: China, India

President-elect **Barack Obama**'s goals for curbing greenhouse gases to 2020 are inadequate to fight global warming, Chinese and Indian delegates told Reuters at U.N. climate talks on Wednesday. Developing nations welcomed Obama's plan for tougher goals than President George W. Bush but said Obama's target of cutting U.S. greenhouse gas emissions back to 1990 levels by 2020 was not enough to avoid dangerous global warming.

<http://www.reuters.com/article/environmentNews/idUSTRE4B254L20081203?feedType=RSS&feedName=environmentNews>

New UN pact may be needed for Climate Victims: WWF

The world may need a new U.N. pact to compensate victims of climate change or risk a tangle of billion-dollar lawsuits linked to heatwaves, droughts and rising seas, a study said on Wednesday.

<http://www.reuters.com/article/environmentNews/idUSTRE4B24XH20081203?feedType=RSS&feedName=environmentNews>

Island States Seek Tougher UN Climate Deal

A group of 43 small island states called on Wednesday for tougher goals for fighting global warming than those being considered at U.N. climate talks, saying that rising seas could wipe them off the map.

<http://www.reuters.com/article/environmentNews/idUSTRE4B234420081203?feedType=RSS&feedName=environmentNews>

Thinning, Carbon Sequestration not at Odds, Studies Suggest

While forest managers are on a quest to purge the nation's forests of hazardous fuels, scientists at the same time are calling for managing forests to sequester carbon. Since trees absorb carbon dioxide, that would appear to present a conflict at first glance. But new research shows that thinning actually results in more carbon storage over the long term, creating a win-win for forest managers grappling with two of the 21st century's biggest resource issues. A new study to be published in the January 2009 issue of the scientific journal *Frontiers in Ecology and the Environment* suggests that what is good for reducing the risk of catastrophic wildfire is also good for controlling climate change

Read full text of article at end of newsletter

Study cited in this news article:

<http://oak.ucc.nau.edu/mdh22/Publications/Hurteau%20and%20North%202008%20carbon.pdf>

Department of Interior Weighs Impact of Climate Change on its Mission

The Interior Department yesterday released three draft reports that evaluate how climate change will affect its mission and present an unprioritized array of more than 80 options for managing those effects. Written by more than 100 agency employees, the reports are the product of the department's Climate Change Task Force, formed by Secretary Dirk Kempthorne in May last year and chaired by its deputy secretary, Lynn Scarlett.

See full text of article at end of newsletter.

Read DOI's Climate Change Strategy: http://www.usgs.gov/global_change/doi_taskforce.asp

CCAR Releases Updated Forest Project Protocols

Revised Forest Protocol (12/5/08):

<http://www.climateregistry.org/resources/docs/protocols/project/forest/forest-revisions/draft-forest-project-protocol-december-2008.pdf>

A powerpoint summary of the updates can be found under the Dec 5, 2008 Workgroup Meeting:

<http://www.climateregistry.org/tools/protocols/project-protocols/forests/forest-protocol-updates.html>

Public comments are due by Jan 19, 2009.

UN Suspends One of its Largest Auditors of Clean Energy Projects

The U.N. climate change body recently suspended Norway's DNV, one of the largest auditors of clean energy projects, for five "non-conformities" relating to its practices, Reuters reports ([via Forbes](#)).

<http://www.environmentalleader.com/2008/12/02/un-suspends-one-of-its-largest-auditors-of-clean-energy-projects/>

Resources:

Sustainable Operations Summary Powerpoint now available on the Sust Ops Website:
<http://www.fs.fed.us/sustainableoperations/susops-summit-2008.shtml>

Updated Forest Service Green Purchasing Guidelines (12/08) – attached

Green Holiday Shopping Tips:

<http://blog.epa.gov/blog/2008/11/18/celebrate-the-environment-shopping/>

Reports:

GAO Report Questions Value of Carbon Offset Deals

GAO-09-151, International Climate Change Programs: Lessons Learned from the European Union's Emissions Trading Scheme and the Kyoto Protocol's Clean Development Mechanism, November 18, 2008
<http://www.gao.gov/new.items/d09151.pdf>

Transition to Green (NRDC)

http://docs.nrdc.org/legislation/files/leg_08112401a.pdf

Journal Articles:

Anderson, Krister; Evans, Tom P; Richards, Kenneth. National forest carbon inventories: policy needs and assessment capacity. Climatic Change. Nov 2008. DOI - 10.1007/s10584-008-9526-6
<http://www.springerlink.com/content/761644264g16065u>

Laurijssen, Jobien; Faaij, André P. C. Trading biomass or GHG emission credits? Climatic Change. Nov 2008. DOI - 10.1007/s10584-008-9517-7
<http://www.springerlink.com/content/m35382151r458760>

Webinars:

Federal Green Challenge Webinar – December 10, 2008

Energy Conservation 101

10:00 a.m. – 11:30 a.m. PST

Reserve your spot! Register now at: <http://www.trainex.org/greenweb>

For more information on the Web Academy:

<http://yosemite.epa.gov/r10/ECOCOMM.NSF/Federal+Green+Challenge/FedGreenAcademy/>

Press Releases:

CCB Standards Second Edition Launched!

The Climate, Community & Biodiversity Alliance has completed a nine-month participatory process to review and strengthen the leading standards for multiple-benefit, land-based carbon offset projects. Experts and practitioners from environmental, development and Indigenous Peoples' organizations, the private sector, government agencies and research institutes have contributed to the creation of the Second Edition of the CCB Standards, released in December 2008.

The Second Edition can be downloaded at <http://www.climate-standards.org/>.

Events:

Frontiers of Conservation Finance. Online; Dec 10, 10am-11:30am EST.

This online event is the next in a series hosted by the [Conservation Finance Forum](#). This discussion will be moderated by **Jim Levitt**, Director of the Program on Conservation Innovation at the Harvard Forest, Harvard University, and features two experts who have both pioneered new approaches to ecosystems services and conservation finance.

For more info and to register: <http://www.innovations.harvard.edu/spotlight.html?id=1871&preview=0>

Climate Change: A Threat to Life and a New Energy Future

Ongoing Exhibit at the American Museum of Natural History. NYC. Oct 18, 2008 – August 16, 2009.

<http://www.amnh.org/exhibitions/climatechange/>

Transatlantic Climate Relations after the US Elections. Brookings Institute. Nov 24, 2008. Washington, DC.

<http://www.boell.de/climate-transatlantic/index-12.html>

Corporate Water Footprinting. December 2-3, 2008. San Francisco, CA.

http://www.greenpowerconferences.com/corporateclimateresponse/corp_water.html

Biodiversity in a Rapidly Changing World. National Council for Science and the Environment. Dec 8-10, 2008.

Washington, DC. <http://ncseonline.org/conference/biodiversity/>

A Conference on Ecosystem Markets 2008: Using Science for Decision-Making in Dynamic Systems. USGS, USFS, US EPA, University of Florida, NSF. Dec 8-11, 2008. Naples, FL. <http://www.conference.ifas.ufl.edu/aces/>

Carbon Markets North America 2009. Environmental Finance. Jan 15-16, 2009. Coral Gables, FL.

<http://www.environmental-finance.com/conferences/2009/Miami09/intro.htm>

Voluntary Carbon Markets USA. Green Power Conferences. Jan 22-23, 2009. NYC.

http://www.greenpowerconferences.com/carbonmarkets/vcm_us09.html

Carbon Trading: Investment Opportunities across the Carbon Credit Markets. Finance IQ. January 26-28, 2008.

NYC. <http://www.igpc.com/ShowEvent.aspx?id=146222>

Ecosystem Services: Marketing Environmental Solutions. Virginia Tech. March 12-13, 2009. Charlottesville, VA.

<http://www.cpe.vt.edu/esmes/index.html>

National Mitigation and Ecosystem Banking Conference: Banking Under the New Rule. May 5-8, 2009. Salt Lake City, UT.

<http://www.mitigationbankingconference.com/>

Carbon in Northern Forests: Integration of Research and Management. June 10-11, 2009. Traverse City, MI.

<http://forest.mtu.edu/cinf/>

Full Text of Selected Articles:

1. TRANSITION: Environmentalists send detailed wish list to Obama (11/25/2008)

***Greenwire* staff**

Environmental groups have sent President-elect Barack Obama a lengthy set of policy recommendations reflecting the hope of activists that major portions of their agenda will be enacted after spending nearly a decade in a defensive battle against the Bush administration.

The 391-page [report](#) delivered to the Obama transition team yesterday provides agency-by-agency proposals, as well as overarching recommendations, such as crafting a new White House-led climate and energy strategy and multi-agency Arctic conservation measures.

The report also repeats a call for swift action on cap-and-trade legislation to curb greenhouse gases and the use of the Clean Air Act to regulate the heat-trapping emissions ([Greenwire](#), Nov. 13).

While white papers are flying all over Washington as the new administration and Congress prepare to take office, the new report is notable for carrying the endorsement from a broad spectrum of environmental groups. The 29 groups that crafted the report include Greenpeace and Friends of the Earth -- generally seen as the left flank of the major environmental groups -- as well as the Environmental Defense Fund, which is known for working in collaboration with industries. Other backers include the Sierra Club, the Natural Resources Defense Council, the League of Conservation Voters, the National Audubon Society, Oceana, the World Wildlife Fund and the National Parks Conservation Association.

"We welcome this opportunity to work with the transition team, and we are encouraged that President-elect Obama has signaled that he is ready to move America forward and to re-engage with the international community to reverse eight years of environmental neglect," the groups said in a joint statement.

The wish list includes a mix of new initiatives and rolling back Bush administration policies the groups oppose. Some of the report's recommendations can be accomplished by administrative action, while others require Congress to step in. Like Obama, the document argues that investments in low-carbon energy can play a major role in helping shore up the economy and creating jobs.

Priorities include greater funding for renewable energy and conservation programs, increased automobile efficiency, reimposing some restrictions on offshore oil and gas drilling and halting new lease sales in Arctic waters. The report calls for new actions at various agencies to address climate change and its effects, such as increased Department of Health and Human Services research and preparation for the public health effects of global warming.

Other recommendations address areas such as curbing exposure to endocrine-disrupting chemicals, greater cooperation with China on energy and "green" supply chain issues and a more expansive view of Clean Water Act protections.

The report also includes recommendations aimed at overhauling what the groups say is a broken regulatory review process at the White House Office of Management and Budget. Environmentalists allege that the Bush OMB has wrongly discarded the views of agency experts and employed an "inherently anti-regulatory" bias.

Some of the major recommendations follow. [Click here](#) to read the full agency-by-agency blueprint.

U.S. EPA, Bureau of Reclamation

The groups highlighted several proposals for revamping U.S. EPA. As a first step, they recommend that the agency complete the review of greenhouse gas emissions ordered by the Supreme Court in the 2007 *Massachusetts v. EPA* decision. The agency should take action to curb the emissions if they are found to be harmful, the court ruled.

Power plant cleanup should be high on the next administration's agenda, the groups said. They are urging Obama to reverse expected changes by the Bush administration to the Clean Air Act's New Source Review provisions and to develop rules to control sulfur dioxide, nitrogen oxides, carbon dioxide and mercury.

The report also emphasizes the importance of resolving the legal limbo that regulations for wetlands, headwater streams and other waters were left in following the Supreme Court's muddled 2001 *Solid Waste Agency of Northern Cook County v. U.S. Army Corps of Engineers* decision and the 2006 *Rapanos-Carabell* decision.

Additionally, they are asking the Obama administration to restore a regulatory prohibition discarded by the Bush administration on discharging solid waste into water bodies.

EPA also should restore reporting requirements for chemical releases reported to the Toxics Release Inventory that were weakened during the Bush administration, the groups said. Keeping perchlorate, a component of rocket fuel, out of drinking water and strengthening pesticide protections also should be high on the agency's agenda.

Another key item on EPA's agenda should be environmental justice, the groups said. The White House should reaffirm its commitment to environmental justice and ensure that EPA acts to protect low-income and minority communities from toxic pollution.

Revising the Bureau of Reclamation's mandate and requiring the agency to coordinate with EPA and the Army Corps of Engineers also is a high priority for the groups. They are pushing for Reclamation to include language recognizing the scarcity of freshwater resources in the West in order to promote efficient water use and to work with the corps and EPA on setting flow standards for rivers and creating a bipartisan water commission to evaluate national water policy.

The report is also asking the bureau to address climate considerations in its water management plans. Efforts to reduce greenhouse gas emissions associated with water systems and help local communities and water-dependent ecosystems cope with the effects of global warming would be a key part of that initiative.

Interior Department, Forest Service

The groups call for the new president to use his executive authority to reinstate moratoriums on offshore drilling that the White House rescinded this summer. They want the National Academy of Sciences to conduct a study on the possible effects of development on the areas, after which a new decision could be made on the drilling bans. They also call for more research on marine ecosystems and for reform of the Minerals Management Service, which has come under harsh criticism in recent years from the Interior inspector general and the Government Accountability Office.

For onshore oil and gas drilling, the groups want the new administration to take a series of steps they see as restoring balance from the Bush administration's push to expedite development on public lands, including additional review of all areas to be leased and of some areas that already have been leased. They also want the administration to convene a task force to review regulations being put in place before President Bush leaves office to allow commercial oil shale development.

The new administration should issue guidelines to all land management agencies to incorporate climate change in planning and management decisions, the report says.

The groups want the new administration to fully reinstate the Clinton-era Roadless Area Conservation Rule, which gave blanket protection to about 58 million forest acres and has been mired in legal fights since President Clinton put it in place just before leaving office. They call for reform of the Forest Service budget, about half of which now goes for firefighting, and for revision of the agency's planning regulations and of certain forest plans.

The National Park Service should receive more funding -- including money in the economic stimulus bill for parks infrastructure projects -- and help for parks to adapt to the effects of climate change, the groups said. They call for the creation of a National Parks Service Corps that would be similar to Americorps, for an Everglades restoration czar and for preventing mining near the Grand Canyon.

The report also calls for gradually increasing funding over five years for the Land and Water Conservation Fund up to its authorized level of \$900 million, starting with \$450 million in FY 2010.

Environmental groups are counting on the incoming Obama administration to reverse several Bush administration policies on endangered species.

Recommendations for the Fish and Wildlife Service include withdrawing guidance from the solicitor's office and freezing or withdrawing endangered species regulations the Bush administration is advancing. The regulations, which have not yet been finalized, would weaken longstanding rules that currently require federal agencies to consult with wildlife experts on potential harm to species for all government projects, like roads or dams. The rules would make the consultations optional.

Beyond blockading those rules, the groups want the new Obama administration to put its long-term focus on responding to climate change and its potential effects on endangered species, wildlife refuges and other habitats. Climate change "strikes to the very core of the FWS mission," according to the report -- and the agency should step up as a leader in response.

The report calls on the new Interior and FWS appointees to finalize a strategic plan on climate change, to work to understand climate change's potential effects on species and wildlife refuges and to work on recovery and adaptation strategies.

The groups also want more committed funding for endangered species, wildlife refuges and adaption planning.

Energy Department

The groups call for stronger programs at the Energy Department that address appliance and building energy efficiency -- which is often seen as the "low-hanging fruit" for curbing emissions -- while low-carbon energy technologies are brought online.

The report's recommendations range from speeding up the notoriously slow program for setting new appliance efficiency standards to a new program to help manufacturers and retailers speed deployment of highly efficient products.

The report requests a doubling of current DOE spending on energy efficiency and renewable energy research and development. But it calls for scrapping a Bush administration nuclear waste reprocessing program called the Global Nuclear Energy Partnership and for limiting nuclear power subsidies.

"There is no need and little political support on Capitol Hill for categorically excluding nuclear power technology as a future energy option, but by the same token there is no compelling justification for subsidizing it either," the report says.

"Just devise grid access and connection policies that ensure nuclear new-build is compelled to compete on a level playing field with cleaner, more cost-effective energy options, including distributed generation, and let the cards fall where they may," it adds. It also calls for suspending work on the Yucca Mountain nuclear waste repository. Other recommendations focus on removing what the report calls barriers to regional transmission for renewable energy.

Transportation

The report's recommendations for the transportation sector focus on increasing auto fuel economy, aligning the nation's transportation strategy with efforts to curb greenhouse gas emissions, and ensuring that any forthcoming economic stimulus injected into the sector is used on low-carbon transportation alternatives.

The group wants stricter corporate average fuel economy, or CAFE, standards that would push automakers to a fleetwide average of 35 miles per gallon by 2015 and 42 mpg by 2020. Under the current rule, carmakers will have until 2020 to reach the 35-mpg mark. The report also asks that any financial bailout extended to the ailing auto industry be tied heavily to carmakers' efforts to exceed fuel economy standards.

Next year's scheduled reauthorization of the highway bill should seek to align the nation's transportation and climate policies, the report says. The forthcoming authorization should incorporate mandatory performance greenhouse gas reduction targets into the planning process and increase investment in public transit and emissions-free alternatives like biking and walking.

If Congress proceeds with an economic stimulus package, the group wants cash devoted to transportation to be used mainly on low-carbon infrastructure projects as opposed to road construction. "Building new road capacity in the name of job creation is a short-sighted strategy that could move us in the wrong direction on climate and other goals," the report says.

There are also recommendations for creating a number of new Transportation Department posts, including an infrastructure czar to oversee planning and funding with an eye towards greenhouse gas reduction, and an assistant secretary for climate change.

USDA

The report calls on the new Agriculture Department appointees to revive a major land conservation effort, the Conservation Reserve Program (CRP), which has floundered, and to put a greater focus on environmental and wildlife benefits in other farmland conservation programs.

Many of the recommendations for USDA's Farm Services Agency and Natural Resources Conservation Service could be completed without new regulations or laws, the report says. But the incoming Obama administration would have to direct more cash toward conservation, it says. The groups want to see full funding for conservation programs at the levels set in the 2008 farm bill.

The groups are emphasizing a revival of the CRP, the nation's largest private-lands conservation program. The Bush administration has not held a general sign-up for the program for the past two years. Environmentalists want the new administration to allow farmers nationwide to enroll in the program and to increase the rental rates farmers get for participating in the program.

The farm bill authorizes USDA to enroll up to 32 million acres in the conservation program. Less than 34 million acres are currently enrolled in the program, and 8.4 million acres of contracts are set to expire in the next two years.

The report recommends new guidance from the Natural Resources Conservation Service to shift other conservation programs to focus on environmental priorities. The groups also want USDA to strengthen regulation of genetically modified crops, issue new rules to make recently plowed-up grasslands ineligible for crop subsidies and increase enforcement of existing rules that require subsidy recipients to meet basic conservation standards.

[Click here](#) to read the report.

By Greenwire reporters Allison Winter, Ben Geman, Katherine Boyle, Josh Voorhees and Noelle Straub.

INTERIOR: Department weighs impact of climate change on its missions (12/04/2008)

Jessica Leber, *ClimateWire* reporter

The Interior Department yesterday released three draft reports that evaluate how climate change will affect its mission and present an unprioritized array of more than 80 options for managing those effects.

Written by more than 100 agency employees, the reports are the product of the department's Climate Change Task Force, formed by Secretary Dirk Kempthorne in May last year and chaired by its deputy secretary, Lynn Scarlett.

At the same time, Kempthorne announced the creation of a new agency climate change coordinator, as well as a climate change advisory council composed of high-level staff.

For Interior, which manages 1 in every 5 acres of U.S. landmass, as well as leases that produce a third of the nation's energy supply, the implications of climate change are coming thick and fast.

The response of the Bush administration, so far, has not been fast enough, according to the Government Accountability Office, which last year strongly criticized it for failing to make climate change a priority in managing federal land and water resources.

The Bureau of Land Management, the Fish and Wildlife Service and the National Park Service, all within the Interior Department, lacked specific strategies and guidance for incorporating climate considerations into management decisions, GAO reported.

A memo of climate options for the Obama administration

The new reports -- on land and water, law and policy, and science -- do not present recommendations but rather give an informal list of specific and agencywide options that the next administration can review.

The reports assume that greenhouse gas regulation policies will come from Congress or broad executive branch action -- not from Interior Department regulation under the Endangered Species Act, a path that the current administration is steadfastly trying to avoid through last-minute changes to regulations.

The department said the reports were written by three subcommittees composed primarily of career staff. Senior officials within the agency and executive branch reviewed but did not edit them, the agency said.

These reports, however, have been expected by some since late last year. "The fact that there was more than year delay suggests that there was probably extensive review," said Mark Wenzler, who leads clean air and climate programs for the National Parks Conservation Association.

Increased flooding, wildfire and drought; rising sea levels; and more invasive species, pests and diseases are just a few of the problems that climate change presents for land, water and wildlife management.

Mitigation options that the land and water report presents include biological and geologic carbon sequestration projects, renewable energy development, and management changes to the agency's vehicle fleet and facilities.

The agency is already pursuing some of these options. In October, for example, it opened 190 million acres for geothermal energy leasing. On the other hand, in recent months, the agency has also pursued a controversial expansion of oil and gas lease sales in the West.

Climate requires some top-level agenda changes

As glaciers disappear from Glacier National Park and coastal boundaries and species ranges shift, climate change also poses major legal and jurisdictional challenges for the agency. Mining and land claims, for example, may need to be re-evaluated.

Major laws will also need to be redefined and examined. The agency could use Endangered Species Act authority to introduce experimental populations outside of their existing ranges or move species as habitat is lost, for example. It also may need to define a basis for determining when the loss of a species is inevitable and defining what exactly the law's language of "foreseeable future" means, according to the report.

New paradigms for land and water rights, such as water markets and shortage sharing, could be explored, says the report.

A common theme was that comprehensive high-level policies are needed. The secretary could issue an order, for example, that all future Interior decisions consider climate change impacts and acknowledge that historical data may no longer be appropriate. The department could also revise its adaptive management strategy to incorporate climate change and create emergency response teams tasked with responding to climate-related disasters. A national strategy for better scientific data collection and early detection and tracking of climate change impacts may also be warranted.

Wenzler said these reports are a promising sign that climate change is becoming a more important priority for the agency.

The options presented, however, are simply for discussion and haven't undergone any budgetary considerations, the agency said.

Though they are not part of any formal rulemaking process, the reports are open for public comment until Jan. 18, 2009.

Sarah J Hines
Presidential Management Fellow
USDA Forest Service, NA & NRS
Newtown Square, PA

p. 610.557.4218
shines@fs.fed.us
