



United States  
Department of  
Agriculture

Forest  
Service

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Flagstaff, AZ 86001-2529  
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File Code: 1950

Date: January 21, 2011

Dear Interested Party:

On behalf of both the Kaibab and Coconino National Forests, we are providing you with an opportunity to comment on the enclosed proposal to conduct restoration activities within a 750,000 acre ponderosa pine ecosystem over approximately 10 years.

Treatment areas are located on the Williams and Tusayan districts of the Kaibab National Forest and on the Flagstaff, Mogollon Rim and Red Rock districts of the Coconino National Forest. Project treatments would occur in the vicinity of Flagstaff, Munds Park, Mormon Lake, Tusayan, and Williams, Arizona (see figures 1-3). A brief description of the purpose and need for the project, the proposed action and a glossary of terms (Attachment 1) is enclosed.

A series of workshops are scheduled throughout the month of February, 2011. The purpose of the workshops is to review treatment proposals by firescape. Detailed information will be provided at the workshops. Your comments and/or participation at the workshops will be used to refine the proposed action. We will post revisions to the proposed action on the web at <http://fs.usda.gov/goto/kaibab/4fri> for review and comment. Revisions will include detailed information such as: desired future conditions, what type of activities would occur, as well as where and when those activities would be expected to occur. We will also provide a range of acres by treatment type.

### Opportunity to Comment on the Proposed Action

Written, facsimile, hand-delivered, oral, and electronic comments on this action will be accepted for 45 calendar days following the publication of the Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) in the Federal Register<sup>1</sup>. Comments will be most helpful if received by **March 14, 2011**.

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<sup>1</sup> Comments received in response to this solicitation, including names and addresses of those who comment, will be considered part of the public record on this proposed action, and will be available for public inspection. Comments submitted anonymously will be accepted and considered. Additionally, pursuant to 7 CFR 1.27(d), any person may request the agency to withhold a submission from the public record by showing how the Freedom of Information Act (FOIA) permits such confidentiality. Persons requesting such confidentiality should be aware that, under the FOIA, confidentiality may be granted in only very limited circumstances, such as to protect trade secrets. The Forest Service will inform the requester of the agency's decision regarding the request for confidentiality, and where the request is denied; the agency will return the submission and notify the requester that the comments may be resubmitted with or without name and address.



Please submit written comments to: Coconino National Forest, Attn: 4 FRI, 1824 South Thompson Street, Flagstaff, Arizona 86001. A comment form has been included for your convenience. The office business hours for hand-delivered comments are: 8:00-4:30 M-F, excluding holidays. Please send facsimile (fax) comments to (928) 527-3620, Attn: 4 FRI. You can also provide oral comments to the Coconino National Forest Supervisor's Office during business hours via telephone or in person, or at an official agency function (i.e., public meeting) designed to elicit public comments. Our office hours are Monday-Friday, 8:00 a.m. to 4:30 p.m., excluding federal holidays.

Submit electronic comments in a format such as an email message, plain text (.txt), rich text format (.rtf), Word (.doc), portable document format (pdf) to 4FRI\_comments@fs.fed.us. Please note, if using the e-mail address, there is an underscore (" \_ ") between the words "4FRI" and "comments". Comments must have an identifiable name attached or verification of identity will be required. A scanned signature may serve as verification on electronic comments.

As mentioned above, in addition to using the commenting options described above, a series of public workshops will be held throughout the month of February while the comment period is underway. Join us! This is a way to learn more about the project and provide site-specific comments:

- February 2, 2011, 1 p.m. to 5 p.m. – Coconino National Forest Supervisor's Office, 1824 S. Thompson Street, Flagstaff, Arizona
- February 9, 2011, 1 p.m. to 5 p.m. – Williams Ranger District, Kaibab National Forest, 742 South Clover Road, Williams, Arizona
- February 16, 2011, 1 p.m. to 5 p.m. – Coconino National Forest Supervisor's Office, 1824 S. Thompson Street, Flagstaff, Arizona
- February 24, 2011, 1 p.m. to 5 p.m. – Coconino National Forest Supervisor's Office, 1824 S. Thompson Street, Flagstaff, Arizona

Thank you for your interest in this project. Please visit either forest web-site for the latest project information at <http://www.fs.fed.us/r3/kaibab> or <http://www.fs.fed.us/r3/coconino> and navigate to the 4 Forest Restoration link. Contact Henry Provencio, project team leader at (928) 226-4684 for additional information.

Sincerely,



MICHAEL R. WILLIAMS  
Kaibab Forest Supervisor



for EARL STEWART  
Coconino Forest Supervisor

Enclosure

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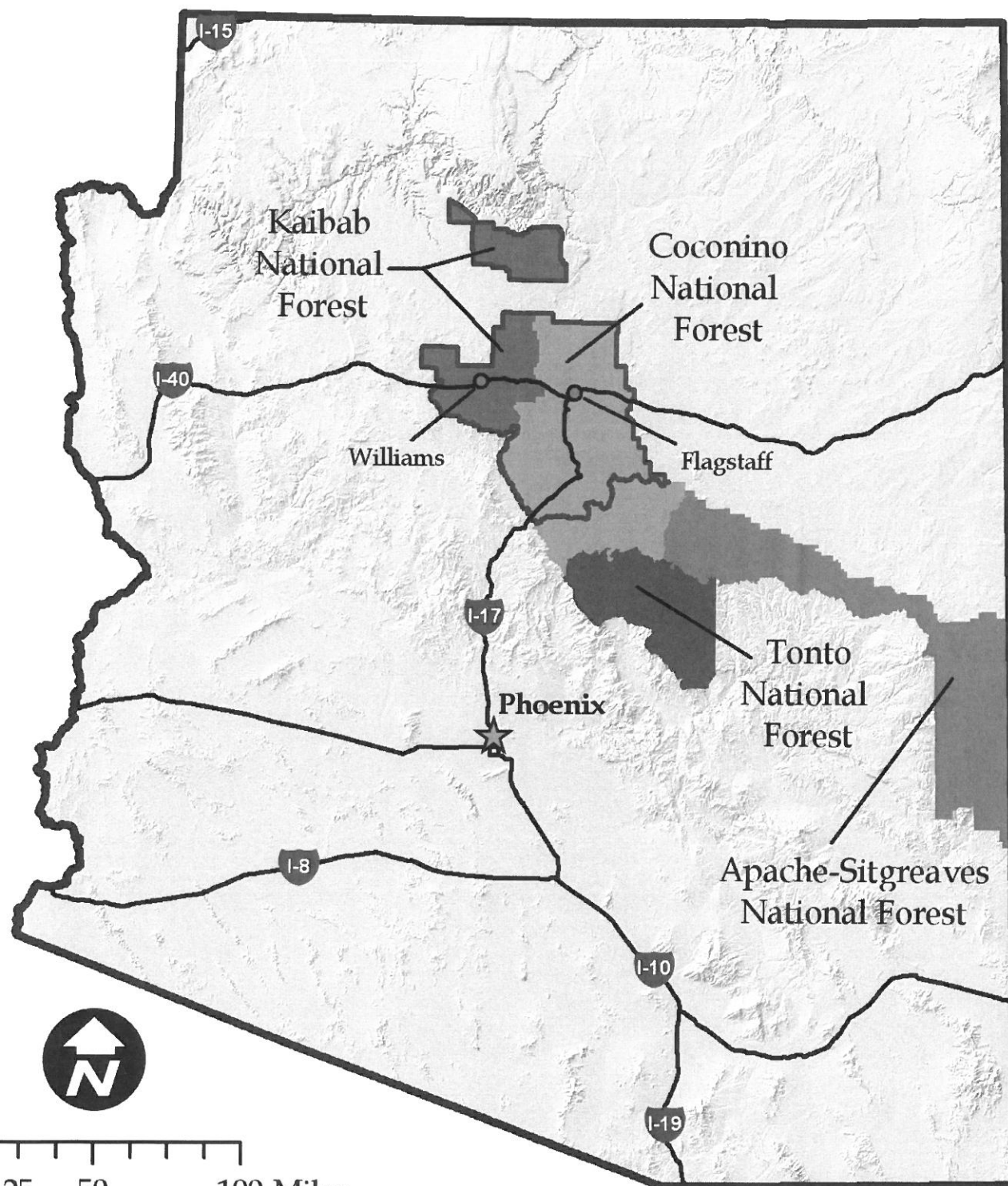
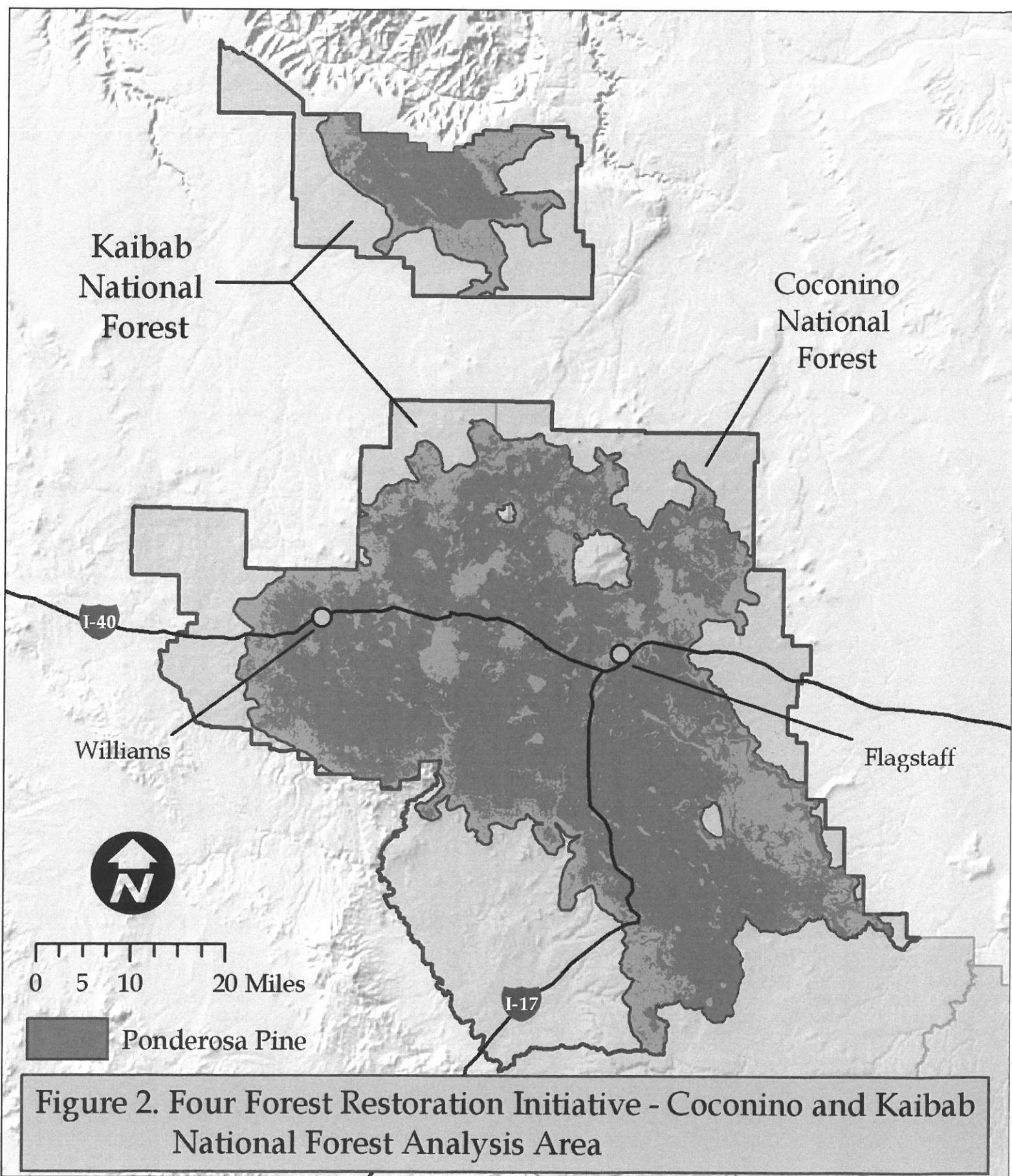
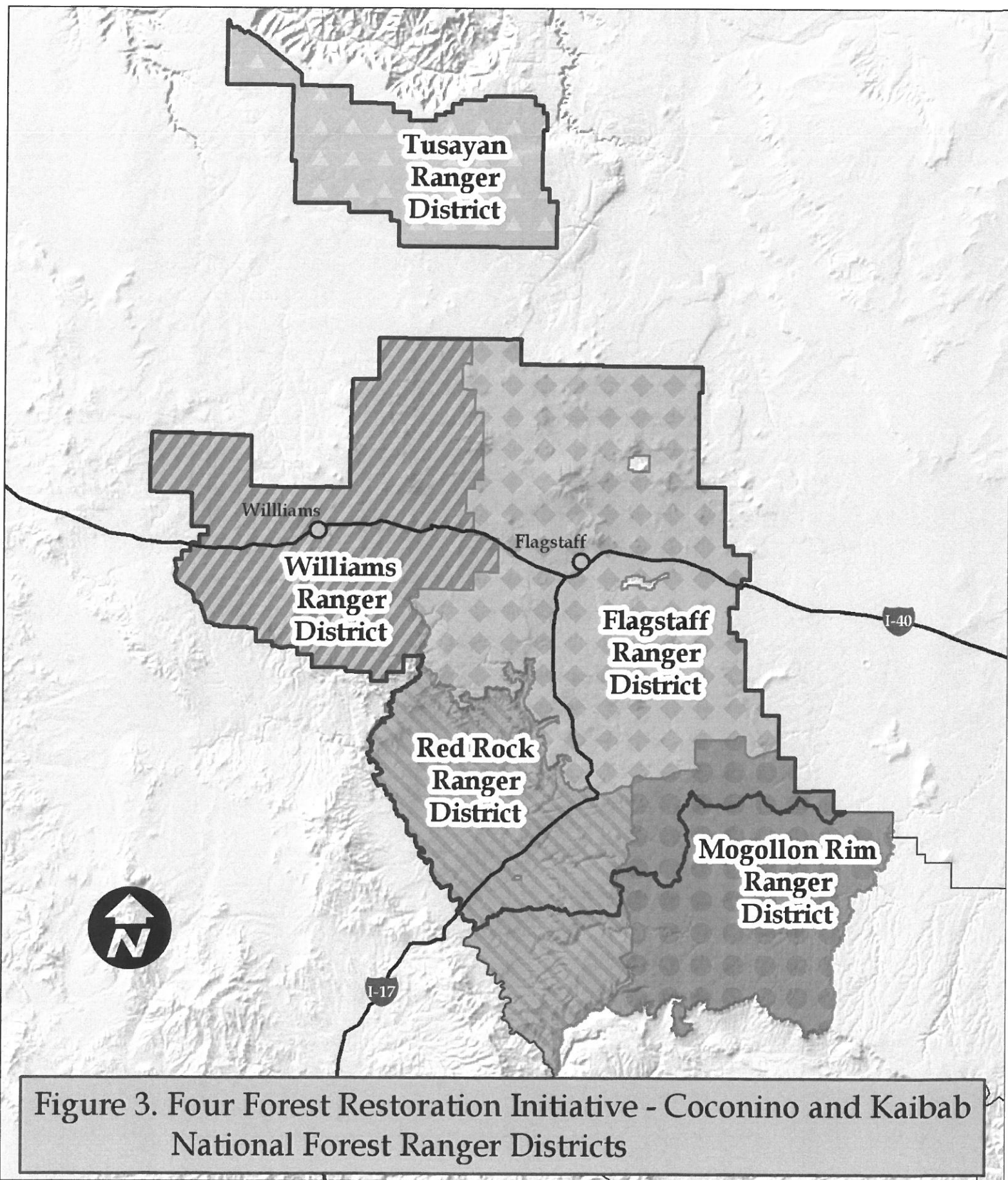


Figure 1. Four Forest Restoration Initiative General Vicinity Map





## Four Forest Restoration Initiative – Coconino and Kaibab National Forest

### Purpose and Need and Proposed Action

#### Need for Action – Why Here, Why Now?

The objective of this project is to re-establish forest structure, pattern and composition, which will lead to increased forest resiliency and function. Resiliency increases the ability of the ponderosa pine forest to survive natural disturbances such as insect and disease, fire and climate change. This project is expected to put the analysis area on a trajectory towards comprehensive, landscape-scale restoration with benefits that include improved vegetation biodiversity, wildlife habitat, soil productivity, watershed function and an opportunity for the safe use of managed fire. A summary of the need for the project is provided below.

#### **Forest Structure and Forest Health**

Historically, the ponderosa pine forest within the analysis area was a mosaic of grassy opening and interspaces with trees arranged in groups and clumps. All tree size classes (an un-even aged structure) were present. Re-occurring low-intensity fire maintained this mosaic. Under these conditions, the forest had faunal diversity and resiliency to fire and other natural disturbances. Today, a lack of re-occurring fire has resulted in a proliferation of smaller trees that have reduced or entirely replaced openings and interspaces that are important to wildlife and the health of the forest. There is a lack of age and size class diversity and the forest has moved towards an even-aged structure. Dense stand of young, small trees have reduced tree growth and health to the point there is a high risk of losing trees that are in the mid to large size classes. Reduced forest health and the lack of diversity have resulted in a forest that is less resilient to the damaging effects of drought, insect and disease, and intense wildfire.

The desired condition is to move towards an uneven-aged forest structure with all size classes represented. A mosaic of grassy openings and tree groups of varying sizes and shapes (groups and clumps) is present and maintained primarily with fire. The numbers of trees are reduced to allow for individual tree growth, vigor, and increased understory grass and forbs production. There is a need to improve forest structure and maintain the forest mosaic with frequent, low intensity fire. There is a need to implement the forest plan which states, “Manage for old age trees such that as much old forest structure as possible is sustained over time across the landscape” (USDA Forest Service 1987, as amended).

#### **Vegetation Composition and Diversity**

Vegetation diversity throughout the analysis area has declined. A lack of fire has allowed Gambel oak, an important habitat component, to become outcompeted by fast growing ponderosa pine. Ponderosa pine has been growing unimpeded since the disruption of fire. Aspen, a species that provides for habitat diversity, is dying or dead due to the combined effects of conifer encroachment, browsing, insect, disease, severe weather events, and lack of fire disturbance (USDA Forest Service 2008) (USDA Forest Service 2009). The desired condition is to have Gambel oak and aspen present and reproducing. Natural disturbance processes such as fire maintains the oak and aspen component within ponderosa pine systems. There is a need to maintain and promote Gambel oak by removing ponderosa pine competition,

stimulating new growth and maintaining growth in large diameter trees. Where possible, there is a need to regenerate aspen by removing ponderosa pine competition, stimulating growth and increasing individual recruitment.

Grasslands (which includes wet and dry meadows), which were once found throughout the analysis area, have shifted to woody vegetation as a result of tree encroachment (USDA Forest Service 2008) (USDA Forest Service 2009). Grasslands provide valuable habitat to many wildlife species including pronghorn antelope, birds and small mammals. The desired condition is to restore the historic patterns of trees within grasslands. There is a need to reduce/remove tree encroachment from historic grasslands. To maintain Gambel oak, aspen and grasslands, there is a need to reduce canopy density by thinning ponderosa pine encroachment.

### **Fire Regimes**

Fire regimes in the analysis area have shifted from frequent, low-intensity surface fires (Fire Regime Condition Class (FRCC I) to lower frequency, high-intensity crown fires (FRCC III). FRCC III indicates high departure from reference conditions and indicates there is potential to sustain a crown fire and high-intensity surface fire. The desired condition is to have the majority of the analysis area in FRCC I. There is a need to reduce the potential for crown fire and high intensity surface fire. In order to maintain grassy openings and interspaces between trees (as well as promote Gambel oak and aspen), there is a need to move towards having frequent fires that burn with low to mixed severity in 0 to 35 year intervals across most of the analysis area. There is a need to strategically place treatments to reduce the effects of high intensity and high severity wildfire on resources such as sensitive wildlife habitat and the urban interface.

### **Ecological Processes and Function**

Riparian systems on the Coconino portion of the analysis area have shifted from having large trees with open canopies to small and medium trees with closed canopies. Understory vegetation has been reduced (USDA Forest Service 2009). The desired condition is to promote large trees and understory vegetation. There is a need to reduce tree encroachment and increase/maintain grasses, forbs and woody vegetation.

This project would take opportunities to restore riparian features such as springs and seeps. There is a lack of recharge in the aquifers associated with these features due to drought, lack of fire, and closed forest canopies which increase evapotranspiration. Excessive disturbance can result in these features becoming non-functional (USDA Forest Service 2008) (USDA Forest Service 2009). The desired condition is to maintain or restore functionality. In order to restore functionality, there is a need to reduce tree encroachment, maintain these features through natural processes, and limit future disturbance where possible and practical.

Throughout the analysis area, dry ephemeral channels have been degraded by past actions. Some channels are heavily eroded with excessive bare ground, denuded vegetation and head cuts. The desired condition is to have fully functioning ephemeral channels to promote the establishment of native vegetation and have reduced sediment flows. There is a need to restore channels to a functioning condition that more closely resembles their natural condition. Throughout the analysis area, there are closed roads<sup>1</sup> and

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<sup>1</sup> This analysis would does not make decisions on what roads would be open or closed, nor would this analysis make decisions on cross country motorized travel. Decisions regarding the forest's transportation network, including

unauthorized user-created routes present. Some road prisms, which were identified for closure in other environmental analyses, are eroding and contributing sediment. Sediment can impact water resources and watershed function. In some cases, the roads and user-created routes are inhibiting the long-term establishment and retention of trees and ground-cover. The desired condition is to return road prisms (as possible and practical) to their natural condition. There is a need to promote and maintain vegetation re-establishment and physically preclude future motorized use on select closed roads and user-created routes.

## Proposed Action

In response to the purpose and need, the Coconino and Kaibab National Forests propose to conduct restoration activities within a 750,000 acre ponderosa pine ecosystem over approximately a 10-year period (figures 3 to 5). The proposed action would:

- Cut trees using a range of treatment methods including group selection, intermediate and pre-commercial thinning. Treatments would focus on the most abundant tree size classes in order to achieve and/or set the analysis area on the trajectory to attain greater diversity (heterogeneity) in spatial patterns and size class distribution. Treatments would be designed to manage for old age trees in order to have and sustain as much old forest structure as possible across the landscape. Strategically-placed treatments would be designed to create tree groups and clumps that stimulate grass, forbs and individual tree growth. The strategic placement of treatments would maximize the ability to reduce fire risk. Trees cut would be mechanically piled, burned, lopped and scattered or removed.
- Cut trees using methods that promote and stimulate the growth of Gambel oak and aspen in order to improve vegetation diversity and wildlife habitat. Protective measures (such as fencing or tree felling) would be used to protect aspen from ungulate use during critical growth periods.
- Cut trees that have encroached on grassland (including wet and dry meadows) to restore historic tree patterns using evidence based science as a guide. After treatment and when appropriate, fire would be used to maintain the grasslands.
- Cut trees within select Mexican spotted owl Protected Activity Centers (PACs) to improve habitat.
- Conduct prescribed burning over a period of 10 years. Methods would include jackpot, pile and broadcast burning. Maintenance burns would occur as needed to maintain openings and interspaces between trees, maintain tree groups and clumps, and move towards and/or maintain Fire Regime Condition Class (FRCC) I.
- Restore dry ephemeral channels to reduce sediment delivery, improve watershed function and increase the potential for future riparian vegetation establishment.
- Utilize protective measures (such as fencing) to protect sensitive riparian resources including springs, seeps and restored channels.

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closed roads, have been made in other environmental analyses. The purpose of this analysis is to disclose the effects of preventing motorized travel on select closed roads and unauthorized user-created routes.

- Utilize (and reconstructing as needed) existing closed roads. Use of the roads would be temporary. Once treatment has occurred, roads would be returned to a closed status.
- Reconstruct (as needed) roads to access treatment areas. Reconstruction may include road blading, culvert installation or replacement and gravelling.
- Decommission select closed and unauthorized roads. Decommission methods would include installing signs, gates, rock barriers, ripping, or re-contouring of slopes to preclude future motorized use. Roads that have established vegetation may need minimal treatment while others may need to be entirely ripped, seeded and slopes re-contoured.
- Obliterate select unauthorized, user-created routes on the Kaibab National Forest. Mechanical equipment would be used to install rock barriers and/or rip, seed and re-contour slopes.

## Design Features, Mitigation, Best Management Practices and Monitoring

The draft proposed action is designed to comply with Coconino and Kaibab forest plan standards and guidelines, as amended. Whether minor forest plan amendments are needed will be determined as the analysis progresses. However, no significant forest plan amendments are anticipated. Design features would be incorporated into the proposed action to protect forest resources including soil, water, scenery values, wildlife and aquatic habitat, and rare plants. Mitigation measures and best management practices will be incorporated into the proposed action to reduce impacts to soil and water resources, prevent the introduction and spread of invasive plants, reduce impacts (and create beneficial impacts) to wildlife, protect heritage resources, and protect public health and safety. A monitoring plan that will inform adaptive management is under development. As mentioned above, comments received during collaborative workshops and throughout the scoping period will guide further refinement of the proposed action, monitoring plan and adaptive management.

## Attachment 1. Glossary of Terms

**Age class** – A distinct aggregation (grouping) of trees originating from a single natural event commonly consisting of trees of similar age.

**Closed Road** - Intermittent service roads that are closed to vehicular traffic but may be available and suitable for non-motorized uses. The closure period must exceed 1 year. Basic custodial maintenance is performed to keep damage to adjacent resources to an acceptable level and to perpetuate the road to facilitate future management activities. Emphasis is normally given to maintaining drainage facilities and runoff patterns. Planned road deterioration may occur at this maintenance level. A closed road is not the same as an obliterated or decommissioned road (USDA Forest Service 2005)

**Clump** - A tight cluster of two to five trees of similar age and size originating from a common rooting zone that typically lean away from each other when mature. A clump is relatively isolated from other clumps or trees within a group of trees. A stand-alone clump of trees can function as a tree group.

**Declining** - The senescent (aging) period in the lifespan of plants that (for trees) includes the presence of large dead and/or dying limbs, snag-tops, large, old lightning scars and other characteristics that indicate the later life-stages.

**Diversity** - The distribution and abundance of different plant and animal communities and species within the area covered by a land and resource management plan.

**Ecological restoration** - The process of assisting the recovery of resilience and adaptive capacity of ecosystems that have been degraded, damaged, or destroyed. Restoration focuses on establishing the composition, structure, pattern, and ecological processes necessary to make terrestrial and aquatic ecosystems sustainable, resilient, and healthy under current and future conditions (USDA Forest Service 2008).

**Even-aged stand** - A stand of trees composed of a single age class in which the range of tree ages is usually  $\pm 20$  percent of rotation (SAF 2008).

**Even-aged management** – The application of a combination of actions that result in the creation of stands in which trees of essentially the same age grow together. Managed even-aged forests are characterized by a distribution of stands of varying ages (and, therefore, tree sizes) throughout the forest area. The difference in age between trees forming the main canopy level of a stand usually does not exceed 20 % of the age of the stand at harvest rotation age. Regeneration in a particular stand is obtained during a short period at or near the time that a stand has reached the desired age or size for regeneration and is harvested. Clearcut, shelterwood, or seed tree cutting methods produce even-aged stands.

**Evidence-based restoration** – Using indicators of trees standing at the time of settlement that are no longer present as living trees—including snags, downed logs, stumps, and stump holes to guide restoration objectives (ERI 2009).

**Fire Regime** - The patterns of fire that occur over a long period of time across a landscape vegetation community, and, its immediate effects on the ecosystem in which it occurs. There are five fire regimes which are classified based on frequency (average number of years between fires) and severity (amount of replacement on the dominant overstory vegetation) of the fire. These five regimes are:

- **Fire regime I** – 0 to 35 year frequency and low (surface fires most common, isolated torching can occur) to mixed severity (less than 75 % of dominant overstory vegetation replaced);
- **Fire regime II** – 0 to 35 year frequency and high severity (greater than 75 % of dominant overstory vegetation replaced);
- **Fire regime III** – 35 to 100+ year frequency and mixed severity;
- **Fire regime IV** – 35 to 100+ year frequency and high severity; and,
- **Fire regime V** – 200+ year frequency and high severity.

**Forage** - Browse and herbage which is available and can provide food for animals or be harvested for feeding; or (2) to search for or consume forage (ITR 1734-4).

**Forest Health** - The perceived condition of a forest derived from concerns about such factors as its age, structure, composition, function, vigor, presence of unusual levels of insects or disease, and resilience to disturbance —note perception and interpretation of forest health are influenced by individual and cultural viewpoints, land management objectives, spatial and temporal scales, the relative health of the stands that comprise the forest, and the appearance of the forest at a point in time (SAF 2008).

**Group** – A cluster of two or more trees with interlocking or nearly interlocking crowns at maturity surrounded by an opening. The size of tree groups is typically variable depending on forest community and site conditions and can range from fractions of an acre (a two-tree group) to many acres. Trees within groups are typically non-uniformly spaced, some of which may be tightly clumped (SAF 2008).

**Group Selection** - A cutting procedure which creates a new age class by removing trees in groups or patches to allow seedlings to become established in the new opening (SAF 1998).

**Intermediate Thinning** - The thinning or cutting of trees to improve the composition, structure, condition, health and growth of remaining trees (SAF, 1998).

**Mature Tree** – tree that has attained most of its potential height growth.

**Openings** - Spatial breaks between groups or patches of trees containing grass, forbs, shrub, and/or tree seedlings but are largely devoid of big trees. For clarification, there are two types of “openings”: 1) inter-group space (matrix) between rooting zones (outer extent of group) composed of few or no trees. It may be desirable to retain a low density scattering of individual trees throughout this area to provide for natural forest patterns and provide long term development of other structural components, and, 2) Regeneration openings – openings created specifically to recruit VSS 1 age class (Youtz et al 2007).

**Over-mature Tree** – A tree that has reached that stage of development when it is declining in vigor and health and reaching the end of its natural life span. Indications of later life stages in southwestern ponderosa pine include yellowing bark, large limbs, dead and/or dying limbs, flat tops, snag tops, lightning scars and burn scars (cat face).

**Pre-Commercial Thinning** – The removal of trees not for immediate financial return but to reduce stocking to concentrate growth on the more desirable trees (SAF 2008).

**Regenerate** - The act of renewing tree cover by establishing young trees naturally or artificially (SAF 2008).

**Resiliency** – The capacity of a (plant) community or ecosystem to maintain or regain normal function and development following disturbance (SAF 2008).

**Road and Route Obliteration** – *see* Road Decommission

**Road Decommission** -Activities that result in the stabilization and restoration of unneeded roads to a more natural state (36 CFR 212.1, Forest Service Manual 7705 - Transportation System [[USDA FS 2003]]). The Forest Service Manual (FSM 7712.11- Exhibit 01) identifies five levels of treatments for road decommissioning which can achieve the intent of the definition. These include the following: 1. Block entrance, 2. Revegetation and waterbarring, 3. Remove fills and culverts, 4. Establish drainageways and remove unstable road shoulders, 5. Full obliteration, recontouring and restoring natural slopes.

**Road construction or reconstruction** - Supervising, inspecting, actual building, and incurrence of all costs incidental to the construction or reconstruction of a road (36 CFR 212.1).

**Stand Density** –A measure of the degree of crowding of trees within stocked areas commonly expressed by various growing space ratios, e.g., height/spacing (SAF 2008).

**Stand Structure** - The horizontal and vertical distribution of components of a forest stand including the height, diameter, crown layers, and stems of trees, shrubs, herbaceous understory, snags, and down woody debris (SAF 2008).

**Temporary road or trail:** A road or trail necessary for emergency operations or authorized by contract, permit, lease, or other written authorization that is not a forest road or trail and that is not included in a forest transportation atlas (36 CFR 212).

**Unauthorized road:** A road that is not a forest road or a temporary road or trail and that is not included in a forest transportation atlas (36 CFR 212).

**Uneven-aged forests** - Forests that are comprised of three or more distinct age classes of trees, either intimately mixed or in small groups.

**Uneven-aged management** - The application of a combination of actions needed to

Four Forest Restoration Initiative  
Coconino and Kaibab National Forest

## Comment Sheet

Did you attend a meeting/workshop? \_\_\_\_\_ Yes \_\_\_\_\_ No

If yes, what date(s)? \_\_\_\_\_

Please check the area related to your comments, using a separate comment form for each area.

\_\_\_\_\_ Coconino Forest-Wide

\_\_\_\_\_ Red Rocks/Sedona

\_\_\_\_\_ Flagstaff District – North of I-40

\_\_\_\_\_ Verde Valley

\_\_\_\_\_ Flagstaff District – South of I-40

\_\_\_\_\_ Mogollon Rim

\_\_\_\_\_ Kaibab Forest-Wide

\_\_\_\_\_ Tusayan District

\_\_\_\_\_ Williams District

### Comment Topic

\_\_\_\_\_ Purpose and Need

\_\_\_\_\_ Vegetation/Silviculture

\_\_\_\_\_ Wildlife – Big Game

\_\_\_\_\_ Wildlife – T&E

\_\_\_\_\_ Wildlife – Sensitive Species

\_\_\_\_\_ Wildlife – Birds

\_\_\_\_\_ Wildlife – Aquatic

\_\_\_\_\_ Wildlife – Other

\_\_\_\_\_ Fuels and Fire Behavior

\_\_\_\_\_ Soils and Watershed

\_\_\_\_\_ Air Quality

\_\_\_\_\_ Transportation

\_\_\_\_\_ Cultural Resources

\_\_\_\_\_ Comment Applies to All

\_\_\_\_\_ Other

\_\_\_\_\_ Recreation Special Uses

\_\_\_\_\_ Developed Recreation

\_\_\_\_\_ Dispersed Recreation

\_\_\_\_\_ Scenery/Visuals

\_\_\_\_\_ Special Areas/Designations

### Comment:

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Thank you for your comments!

More information can be found at <http://www.fs.usda.gov/goto/kaibab/4fri>

If you have questions, please contact Paula Cote at 928-226-4686.

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If you have questions, please contact Paula Cote at 928-226-4686.

Four Forest Restoration Initiative  
Coconino and Kaibab National Forest

***Please Tell Us Your Preference for Receiving Documents including the Scoping Letter, DEIS, FEIS/ROD (we would like to keep printing costs down and send documents via e-mail or share by posting to our website):***

☐ I prefer to receive documents by e-mail which is: \_\_\_\_\_

☐ I prefer to view documents on the forest web-site

☐ I would like to receive a CD copy of the DEIS and FEIS/ROD (*Note: Scoping letter will not be available via CD*)

☐ I would like to receive documents in hard-copy form (***please make sure you have provided your address***)

***Has Your Address Changed? Please provide your new address:***

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**Please submit all comments no later than March 14, 2010.** This will allow the 4 FRI team sufficient time to consider your comments in order to identify issues, alternatives, mitigation and monitoring options.

**Web Site:** <http://www.fs.usda.gov/goto/kaibab/4fri>

**Email Address:** [4FRI\\_comments@fs.fed.us](mailto:4FRI_comments@fs.fed.us) Please note: there is an underscore “\_” between the words “4FRI” and “comments” (4FRI\_comments)

**US Mail:** Coconino National Forest, 1824 South Thompson St., Flagstaff, AZ 86001, *Attn:* 4FRI

**PLEASE NOTE:** General comments will always be accepted and considered in subsequent steps of the 4 FRI NEPA process.

Thank you for your comments!

More information can be found at <http://www.fs.usda.gov/goto/kaibab/4fri>

If you have questions, please contact Paula Cote at 928-226-4686.