June 5, 2014

This is a Notice of Appeal pursuant to the Optional Appeal procedures.

Re: Appeals may also be faxed (Fax number is 703-235-0138) or appeals may be mailed electronically in a common digital format to: <a href="maileo-appeals-chief@fs.fed.us">appeals-chief@fs.fed.us</a>.

At a minimum, notices of appeal must include:

• A statement that the document is a Notice of Appeal filed pursuant to the Optional Appeal procedures;

This is a Notice of Appeal pursuant to the Optional Appeal procedures

• The name, address, and telephone number of the appellant;

Raymond C. Keeler 26406 N. 43<sup>rd</sup> Avenue Phoenix, Arizona 85083 623-523-1760 rckeeler@cox.net

Member, Central Arizona Grotto of the National Speleological Society

- Identification of the decision to which the appeal is being made;
  Approval of the Kaibab National Forest Land and Resource Management Plan
- Identification of the document in which the decision is contained, by title and subject, date of thedecision, and name and title of the Deciding Officer;

Kaibab National Forest Land and Resource Management Plan Karst Management 2/3/2014

Responsible Official:

Calvin N. Joyner Regional Forester USDA Forest Service, Southwestern Region 333 Broadway Blvd. SE Albuquerque, NM 87102

Kaibab National Forest Land and Resource Management Plan Michael R. Williams Forest Supervisor Kaibab Forest Supervisor's Office 800 S. 6th Street Williams, AZ 86046 (928) 635-8200 Mailroom\_R3\_Kaibab@fs.fed.us • Identification of the specific portion of the decision to which the appeal is made;

## Caves, Karst, and Mines, pages 56-57

- The reasons for appeal, including issues of fact, law, or regulation, or policy and, if applicable, specifically how the decision violates law, regulation, or policy;
  - Karst management as stated in the "Desired Conditions for Caves, Karst, and Mines" and "Guidelines for Managing for Caves, Karst, and Mines" do not include karst surface management
  - Specifically, timber harvesting, grazing, and non-hard surface road construction policy in karst terrain is completely missing.
  - The Kaibab Plateau is the aquifer recharge area, and primary water source for Grand Canyon
    National Park. This is water source for both the North and South Rim public areas.
  - Attached is "Kaibab North Karst LIDAR.pptx" showing karst features on the north Kaibab.
    These four slides show the extent of the karst feature on the North Kaibab NF where karst surface management should be considered and/or employed.
  - The Forest Plan references the "Central Arizona Grotto 2013. Arizona National Forest Cave and Karst Management Plan (draft)" in section "Other" on page 189.
  - o In this document karst surface management is presented in Appendix J Karst Management.
  - As a relevant note, The Arizona National Forest Cave and Karst Management Plan document has seen substantial changes and improvements since the version included in the referenced hyperlink. The Karst Management section and appendix have remained intact.
- Identification of the specific change(s) in the decision that the appellant seeks.

In the "Caves, Karst, and Mines" section, in the "Desired Conditions for Caves, Karst, and Mines" and "Guidelines for Managing for Caves, Karst, and Mines", add bullet items addressing conservation to karst surface management for grazing, timber harvesting and non-hard-surface road construction.

In the "Management Approach for Caves, Karst, Mines" second paragraph, last sentence, change"

From: "Cave management plans will be developed as needed to address cave and karst resource concerns."

To: "Cave **and Karst** management plans will be developed as needed to address cave and karst resource concerns."

Thank you for your time,

Ray Keeler rckeeler@cox.net 623-523-1760