United States Department of Agriculture | Forest Service | Kaibab National Forest | 800 South Sixth Street Williams, AZ 86046-2899 (928) 635-8200

File Code: 1920/1570
Date: August 22, 2014

Raymond C Keeler
26406 North 43rd Ave
Phoenix, AZ 85043

eCertified: 91 7199 9991 7033 2214 5564

Dear Mr. Keeler:

Thank you for meeting with me and others from the Forest Service on July 25, 2014, to discuss your appeal of the Regional Forester's decision approving the Kaibab National Forest Land and Resource Management Plan (Forest Plan). I am encouraged that we were able to address your concerns regarding karst surface management in the Forest Plan. I believe the changes we've agreed to will help protect and maintain these important resources. You indicated the changes would alleviate your concerns and that you are willing to withdraw your appeal based on our commitment to make the changes to the Forest Plan.

I have shared our agreed upon changes to the Forest Plan with Calvin Joyner, Regional Forester, and he has also agreed to them. Please find enclosed a document showing the specific changes we've agreed to. The language changes are indicated in red and underlined, along with the Forest Plan references showing where the changes will be made. These are administrative changes that do not require a plan amendment or a plan revision. We expect new Forest Service policy on administrative corrections to forest plans will be released soon and once that occurs we will make the changes and notify you when they become effective. In the interim, our Forest Planner and watershed specialist will ensure that the information is shared and used in project planning.

In order to withdraw your appeal, please send an email to appeals-chief@fs.fed.us stating your name and that you are withdrawing your appeal (# 14-13-00-0175) of the Kaibab Forest Plan decision. Please contact Ariel Leonard, Kaibab Forest Planner, at (928) 635-8283 if you would like additional information.

Thank you for your interest in the management of the Kaibab National Forest.

Sincerely,

/s/ Michael R. Williams
MICHAEL R. WILLIAMS
Forest Supervisor

Enclosure

cc: Bob Davis
Ariel G Leonard
Matt Turner

Margaret Van Gilder

Management Approach for Vegetation Management (Kaibab Plan p.31)

See also "Recreation and Scenery," "Nonnative Invasive Species," "Wildlife", "Threatened, Endangered, and Sensitive Species", "Caves, Karst, and Mines" and relevant major vegetation communities.

Caves, Karst, and Mines (Kaibab Plan pp. 57-58)

Caves, karst, and mines provide habitat for many biota including bats, which require specialized niches for roosting and overwintering. Bats are important to cave ecosystems, especially large roosts. Cave ecosystems rely almost entirely on the surface for nutrients. As a result, bats deposit considerable amounts of surface nutrients into caves via guano. Because of this, the presence of keystone species. Eighteen bat species are known to regularly use caves in the American Southwest, and Arizona is home to all of these species. Many caves also have important traditional cultural significance to area tribes. Due to these and other resource concerns, there are no caves on the Kaibab NF currently identified as appropriate for recreational activities.

Karst features are geological landforms that predominantly result from shaping process controlled by soluble bedrock, usually calceric in nature. Karst landscape is characterized by closed depressions, disappearing streams, and solutional shaping. Karst features create unique microhabitats and are important areas for rapid subsurface drainage and aquifer recharge.

Guidelines for Managing for Caves, Karst, and Mines (Kaibab Plan p.57)

• Project design should include protections for subsurface geologic features to minimize disruptions to hydrogeology, cave microbiology and other aspects of cave ecology.
• When entering caves or mines, decontamination procedures should be followed for preventing the spread of white-nose syndrome (WNS; *Pseudogymnoascusdestructans*).
• Caves containing endemic species should be managed for the protection of those species over other uses.
• Before closing caves or mines, they should be inspected to determine if bats are using these areas. If roost sites are present, closure structures such as wildlife friendly bat gates that meet the most current recommendations should allow bats to continue to use the cave or mine.

Management Approach for Caves, Karst, and Mines (Kaibab Plan p.57)

Strategies to protect cave and karst resources include use of best management practices and site specific design features such as activity buffers that prevent silt, sediment and debris from flowing into karst features where they occur. The Kaibab NF references the Arizona National Forest Cave and Karst Management Plan, Appendix J - Karst Management, current literature, and the best available science when making site specific decisions relevant to project planning.

Currently, neither the cause nor the transmission of WNS is well understood; however, it is known that a cave or abandoned mine environment containing this fungus is infectious to hibernating bats. To ensure that management activities are using the best available information, the Kaibab NF has been collaborating with the USFWS, Bat Conservation International, AGFD, the National Speleological Society, and others to address conservation management for bat species, including the development of a response plan for WNS. A complete inventory of caves and associated endemic species may be needed on the Kaibab NF to inform management.

Additionally, strategies include working with public affairs, recreation, invasive species, cave and mine staffs; State and other Federal agency partners; and involved publics such as local caving groups to

internally and externally increase WNS awareness at local and regional levels. Cave and karst management plans will be developed as needed to address ~~cave and karst~~ resource concerns.

Management Approach for Livestock Grazing (Kaibab Plan p. 70)

Adaptive management is being used by the Kaibab NF's recent rangeland management projects. Monitoring is used to adjust management to maintain and improve the rangeland resources. In general, the Kaibab NF continues to keep grazing at conservative use levels (30 to 40 percent). This grazing intensity, based on percent use of forage by weight, should provide for plant integrity, density, diversity, and regeneration over time.

To make adjustments for changing conditions, the annual operating instructions are reviewed. Numbers may go up and down annually, but do not exceed the number set in the grazing permit. The annual operating instructions are the means by which adjustments of livestock numbers, salt locations, change of season of use, and pasture rest periods are made in response to monitoring information such as frequency plots, canopy cover, pace frequency transects, and allotment inspections. Grazing intensity (measured before the end of the growing season) in combination with other factors such as weather patterns, likelihood of plant regrowth, and previous years' utilization levels, is used in determinations. Projects involving new or modified fences, corrals, salt stations, and artificial water sources promote healthy wildlife interaction and movement, and healthy soil and watershed conditions. Deferred-rotation grazing with a special emphasis of deferment during the spring may be necessary to manage toward desired conditions.

See also the desired conditions for the relevant vegetation types, "Natural Waters," "Constructed Waters", "Caves, Karst, and Mines" and "Wetland/Cienega."

Management Approach for Transportation (Kaibab Plan p. 77)

In order to provide safe and efficient travel and support resource management on NFS lands, the Kaibab NF manages the Forest transportation system, conducts inventories, surveys and analyses, formulates plans, and executes reconstruction, maintenance, and obliteration operations. The transportation and facility management on the Kaibab NF is integrated with potentially affected resource areas and is coordinated with Federal, State, county, and other local transportation authorities. Best Management practices are used in project design. This includes working closely with the AGFD, Arizona Wildlife Linkages Working Group, and Arizona Department of Transportation (ADOT) to identify wildlife habitat needs, potential barriers to wildlife movement, and to mediate such threats during new projects by designing effective wildlife crossings and travel migration areas early in the transportation planning process.

Appendix B. Relevant Laws, Regulation, and Policy

Programmatic Agreements (Kaibab Plan pp.188-189)

Memorandum of Understanding between the National Speleological Society and the USDA Forest Service, (2011).

Other (Kaibab Plan pp.189-190)

Central Arizona Grotto 2013. Arizona National Forest Cave and Karst Management Plan https://docs.google.com/file/d/0B6ltDV4wi2eQbWFrNkxZd25DalE/edit?pli=1