

Nomination Received by Council on Environmental Quality, Executive Office of the President
For the CEQ NEPA Pilot Project Program
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations>

PART I. NOMINATOR

First Name:	Bob
Last Name:	Davis
Organization:	USDA Forest Service, Region 3
Project Title:	Four Forest Restoration Initiative (4FRI)
Submitted by:	Federal Agency
Date Received:	06/14/2011

PART II. SHORT ANSWERS

I. What Federal agency or agencies will be involved in this pilot project?

The USDA Forest Service, DOI U.S. Fish and Wildlife Service are the primary Federal agencies implementing the Four Forest Restoration Initiative (4FRI). In addition to their consultative role, the U.S. Fish and Wildlife Service has been directly involved in evaluating the existing condition of Mexican spotted owl (Threatened species status) habitat and in crafting specific proposed action design features to improve habitat. Other agencies that are involved in terms of environmental compliance include the Arizona Department of Environmental Quality (ADEQ) and the State Historic Preservation Office. In its capacity as the agency responsible for implementing the Federal Clean Air Act, ADEQ has been involved in the design of the proposed action in terms of minimizing the potential for nuisance smoke.

II. What is the Federal action to which this NEPA pilot project applies?

This effort has been recognized by the USDA Collaborative Forest Landscape Restoration Program as the top collaborative forest restoration project in the nation. It is an ideal candidate for this pilot program because it provides an opportunity to learn how NEPA efficiencies can be gained through: (1) project planning at unprecedented scales, (2) innovative methods of collaboration, (3) integration of a robust adaptive management program, and (4) other cutting-edge communication and GIS-based planning tools. The 4FRI will be conducted in multiple phases. The first environmental analysis is a site-specific Environmental Impact Statement that focuses on the Coconino and Kaibab National Forests and proposes a suite of restoration actions across approximately one million acres. Proposed actions include mechanical thinning, prescribed burning, temporary road construction and decommission, road reconstruction, road and unauthorized route decommission and obliteration, ephemeral stream channel restoration, and riparian springs and seeps restoration.

III. How will this pilot project reduce the costs and time needed to complete the NEPA process?

4FRI's collaborative planning efforts, before and during the NEPA process, have increased planning efficiency. Products generated by the 4FRI stakeholder group have informed Forest Service planning efforts. The collaborative nature of this planning process addresses controversial environmental and social issues and establishes broad public support for the project, reducing the likelihood of costly appeals.

**Nomination Received by Council on Environmental Quality, Executive Office of the President
For the CEQ NEPA Pilot Project Program**
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations>

By conducting landscape-scale environmental analyses, 4FRI hopes to gain efficiencies by eliminating redundant NEPA processes and documentation. For example, the 4FRI stakeholder-developed landscape strategy sets the stage for conducting multiple site-specific environmental analyses across 4FRI's 2.4 million acres. This novel, landscape-scale approach to NEPA planning negates the need to conduct the estimated 20 to 50 individual NEPA analyses that the Forest Service would typically complete for such an area. Site-specific planning at 4FRI's scales, however, would not be possible without the efficiencies gained through the use of cutting edge Forest Service and stakeholder technology that provides for site-specific analyses at unprecedented scales.

Efficiencies could be lost without a robust and efficient adaptive management program that limits the need for frequent NEPA supplementation. Therefore, 4FRI is working to develop an appropriate adaptive management strategy. We have created a framework that will allow necessary flexibility for efficiently and effectively designing treatments to meet site specific conditions across such a large landscape. The USFS and stakeholders are working to develop a robust monitoring program that addresses key ecological functions at multiple scales and identifies meaningful triggers to ensure that management can change as lessons are learned.

Lastly, 4FRI gains efficiencies by using a dedicated team of resource specialists who are solely dedicated to 4FRI's NEPA planning and who work across national forest boundaries. Initially using the same resource specialists for all 4FRI-related NEPA analyses ensures continuity and significantly reduces the specialists' learning curves, resulting in additional efficiencies and knowledge that can be transferred to other planning efforts.

IV. How will this pilot project ensure rigorous environmental protection?

The scale of 4FRI's NEPA analysis affords opportunities and challenges for rigorous environmental protection. Specifically, 4FRI incorporates a rigorous cumulative effects analysis, high-quality collaboration, proactive consultation with regulatory agencies, and the inclusion of a formal adaptive management and implementation framework. Additionally, 4FRI leverages information technology tools that improve information quality and the rigor of environmental analyses.

The analysis will disclose short and long-term impacts and benefits to wildlife populations across the landscape (approximately one million acres) and will consider the cumulative effect of activities planned across the entire landscape. By conducting analyses at large-scales, landscape-scale wildlife movements and fire behavior can be analyzed more effectively.

Although large-scale analyses can potentially weaken environmental protection by disclosing environmental effects via generalized discussions of resource disturbance, 4FRI offers an innovative solution. Through development of an implementation checklist and plan, resource protection can be assured. Prior to on-the-ground implementation, 4FRI's resource specialists will evaluate the actions to be implemented against the project checklist to ensure the actions

**Nomination Received by Council on Environmental Quality, Executive Office of the President
For the CEQ NEPA Pilot Project Program**
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations>

proposed include decision elements, such as protective design features (forest plan requirements, soil and water best management practices, mitigation, monitoring).

By engaging a broad spectrum of stakeholders, 4FRI is benefiting from a more thorough and thoughtful exploration of environmental issues and data sources. Consideration of these issues and data sources during 4FRI's NEPA analyses increases the likelihood of rigorous environmental protection.

The scale, magnitude, and importance of 4FRI have allowed it to benefit from an enhanced level of consultative support from the Arizona Game & Fish Department and US Fish & Wildlife Service. This support has allowed the need for improved wildlife habitat and connectivity to be at the forefront of project design and implementation.

Lastly, the 4FRI's adaptive management plan will allow for agile responses to changing conditions and lessons learned. The plan creates data-informed management changes over time to increase environmental protection through time. Whether those changes would be consistent with the NEPA analysis would be evaluated via the adaptive management plan.

V. How will this pilot project improve the quality and transparency of agency decisionmaking?

Since 2009, stakeholders have worked together to identify restoration needs and potential actions. The Forest Service and the 4FRI stakeholder group have established a MOU for NEPA collaboration that is based, in large part, on CEQ's collaboration guidance document.

Transparency has been built into the NEPA process by sharing draft products in public meeting venues prior to documents becoming finalized. The collaborative nature of 4FRI's NEPA process was demonstrated through the process of refining the proposed action. The draft proposed action was available for comment and review and public meetings were held to gather recommendations and comments. The revised proposed action will now be sent out for further public review prior to it being finalized.

In the fall of 2011, to further support collaboration and transparency, the Forest Service will have access to e-collaboration software as it will be participating in the agency's Comment Analysis Response Application (CARA) module test. With this software, stakeholders and the Forest Service will be able to complete content analysis, comment on content, and track comment consideration and disposition, all online.

Collaborative efforts before and during the NEPA process have already resulted in a more transparent process that can assist the responsible official. CEQ guidance on collaboration envisions true engagement and two-way communication between Federal agencies and collaborators throughout the NEPA process. Stakeholders frequently express a desire for collaboration to be a more democratic process with stakeholder ownership of the decision. However, as stated in the CEQ Collaboration in NEPA: A Handbook for NEPA Practitioners (page 4), the agency retains decision making authority and responsibility throughout the NEPA

**Nomination Received by Council on Environmental Quality, Executive Office of the President
For the CEQ NEPA Pilot Project Program**
<http://www.whitehouse.gov/administration/eop/ceq/initiatives/nepa/nepa-pilot-project-nominations>

process. It states, “Using collaboration does not increase or decrease the agency’s responsibilities or authority.” Also, the legal constraints caused by the Federal Advisory Committee Act and legal requirements for agency autonomy and discretion, often limit or prevent such a collaborative process as envisioned by CEQ and/or desired by stakeholders. We believe that additional guidance and support from CEQ could be beneficial in making the decision-making process as transparent and responsive as possible.

VI. Will this pilot project develop best practices that can be replicated by other agencies or applied to other Federal actions or programs? Please describe?

4FRI will develop, identify, and document replicable best practices that can be used both internally and externally. 4FRI’s planning team will closely examine NEPA planning processes used during the project’s first phase environmental analysis in order to identify which practices should be replicated in the project’s subsequent phases. Additionally, as the pre-eminent USDA Collaborative Forest Landscape Restoration Program project in the nation, 4FRI will be monitored by other CFLRP projects and has a responsibility to share its lessons learned with other CFLRP projects. Furthermore, as the largest project-level NEPA analysis ever conducted by the Forest Service, the agency has a significant interest in learning from the NEPA approaches used in planning the project. Lastly, to the extent CEQ supports the 4FRI as a pilot project, Forest Service staff and stakeholders will work closely with CEQ staff to identify and develop best practices that can be used by other agencies.

4FRI offers a variety of innovative NEPA approaches that, if successful, can be used as best practices for a variety of other projects. For example, 4FRI is already experimenting with finding new approaches to planning landscape-scale projects. With the first phase’s environmental analysis, 4FRI is conducting site-specific NEPA documents at unprecedented scales, using advanced assessment technologies. As 4FRI moves into its subsequent phases, the Forest Service and stakeholders are evaluating a range of different landscape-scale assessment approaches in order to determine which offer the most rigorous environmental protection, strongest legal footing, make the most efficient use of time and planning resources, and provide a workable solution to operational constraints. In this regard, the pilot could benefit from regular engagement with CEQ to develop and deploy a maximally efficient, rigorous and multi-scaled NEPA framework that would best serve 4FRI’s goals and the letter and intent of the law. 4FRI is also breaking new ground in garnering upfront public support and fostering public collaboration during the NEPA process. 4FRI has also developed an effective and cost-efficient implementation plan, and is creating a robust monitoring and adaptive management plan. In sum, 4FRI is pushing the bounds of NEPA planning and collaboration. If any of these efforts prove successful, they could be replicated by other agencies on other projects.

PART III. PROJECT DESCRIPTION

(See attachment on following page.)

PART III. Four Forest Restoration Initiative (4FRI) PROJECT DESCRIPTION Response

The Four Forest Restoration Initiative (4FRI) is a 20-year collaboratively planned effort by the U.S. Forest Service and over 40 stakeholders to implement forest restoration activities across 2.4 million acres of ponderosa pine forests in northern Arizona's national forests (i.e., Apache-Sitgreaves, Coconino, Kaibab, and Tonto National Forests). The 4FRI is designed to creating healthy, diverse forests that support abundant populations of native plants and animals and pose little threat of destructive wildfire.

The resource management issues driving the action include lack of a balanced forest structure, declining forest health, and a loss of vegetation diversity within Arizona's ponderosa pine ecosystems. This has resulted in an ecosystem that is less resilient to the damaging effects of drought, insects, and disease and that exhibits uncharacteristic wildfire behavior that threatens critical wildlife habitat and nearby communities. To help alleviate these issues, the 4FRI is proposing to implement mechanical thinning treatments, prescribed burns, and other ecosystem restoration activities.

The 4FRI supports several Administration priorities. Specifically, the project is using a collaborative approach to restore natural resources, making forests more resilient to climate change, protecting water resources, and improving forest health while creating jobs and opportunities.

If selected, the CEQ pilot project would involve an examination of the NEPA planning approaches and processes used for the first phase of the 4FRI – a one-million acre site-specific environmental impact statement. Collaborative data collection, analysis, and planning have been underway on the first phase of 4FRI since 2009. In January 2011, the Forest Service formally initiated its NEPA planning process for 4FRI's first phase with the release of a Proposed Action. The Forest Service is now in the process of collaboratively refining the Proposed Action. The Forest Service hopes to issue a Draft EIS during the 4th quarter of 2011 and the final EIS and ROD during the 2nd quarter of 2012.

Implementation of the project will begin shortly after issuance of the ROD and will utilize a 10-year implementation plan to assure the decision is implemented as written. As the decision ages and implementation continues, the Forest Service's Chapter 18 review process (Forest Service Handbook 1909.18) will be used to evaluate changed conditions as needed.

Additionally, depending on Forest Service and CEQ timelines, the CEQ pilot project could include NEPA planning efforts for subsequent phases of 4FRI. The Forest Service is beginning to compile data and work with stakeholders to initiate restoration planning across the remainder of the 2.4 million acre landscape in need of restoration.

The 4FRI is the largest forest restoration project ever attempted and has already been selected by the USDA's Collaborative Forest Landscape Restoration Program as the nation's top priority forest restoration project. If selected as a CEQ pilot project, 4FRI would provide CEQ with a unique opportunity to examine possible NEPA implementation efficiencies gained through innovative planning approaches that include, (1) project planning and environmental analysis at

unprecedented scales, (2) innovative methods of collaboration through the NEPA process, (3) integration of a robust adaptive management program, and (4) leveraging state-of-the-art technology for landscape-scale planning.