

December 2, 2020

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Manti-La Sal National Forest

Mr. Nehl and Mr. Beagley -

These are my first, but not my last, comments on the Draft Revised Forest Plan of October 2020. They primarily concern the Monticello Ranger District, but may apply to all of the Ranger Districts.

In December of 1995, a new National Forest Landscape Management Manual was implemented by the Forest Service: "Landscape Aesthetics, A Handbook for Scenery Management" (Agriculture Handbook Number 701). That was 25 years ago, and I'm still waiting for the Manti-La Sal National Forest to implement it. On page 20 of the Handbook, under "Purpose and Scope" is the statement: "The goal of this handbook is to explain scenery management as an integrated part of ecosystem management for all levels of planning, including forest planning." Following this statement are the objectives of the handbook. The final result will be Scenic Integrity Objective maps. Based on the maps provided to the public to date, it does not appear that the Forest Planning Team has made any effort to follow the requirements of the Handbook.

Appendix 1 of the Manual, "Case Study," includes the steps necessary to arrive at Scenic Integrity Objective maps:

INVENTORY:

Determine Landscape Character

This map has not been provided to the public. Does it exist?

Analyze Existing Scenic Integrity

A mislabeled map shows this information. However, it is in conflict with the information on other maps. This will be discussed later in these comments. "Existing scenic integrity (ESI) is defined as the current state of the landscape, considering previous human alterations." (SMS p.I-2-Case Study)

Determine Inherent Scenic Attractiveness

No map has been provided with this information. Does one exist?

Determine Landscape Visibility

"The first step in mapping is to determine which travelways and use areas will be inventoried for landscape visibility." (SMS p.4-10) Why isn't there a map that includes the Primary road system, the Secondary road system, all of the (41) hiking trails, the (23) OHV trails, the campgrounds, lakes, scenic viewpoints and other use areas on the Monticello Ranger District? This map is supposed to be the starting point for mapping the distance zones that will have "Concern Levels" added. A "Seen Area" map results from placing the Concern Levels on the Landscape Visibility map.

I have been asking the Forest for an up-to-date Seen Area map ever since the existing Forest Plan was finalized in 1986: that's 34 years!!! Evidently this map still does not exist.

Determine Initial Scenic Class Assignments

This cannot be done without a Seen Area map with Concern Levels.

IMPLEMENTATION:

Consolidate Scenic Class Assignments

Assign Scenic Integrity Objectives to Management Areas

Produce Scenic Integrity Objective Maps

Obviously implementation cannot take place until the inventory is completed. However, p.67 of the Draft states: "Appendix A includes the scenic integrity objective maps." This statement is not correct. It would mean placing implementation before the inventory. The title of the map in Appendix A is: "Scenery Management Spectrum, South Zone, Monticello." This also is not correct. The legend on the map states: "Draft Scenic Integrity Levels." And this map is in conflict with the map: "Proposed Wilderness for Further Analysis, South Zone, Monticello." Areas shown as having a "Low" scenic integrity are included in several of the areas on the "Proposed Wilderness for Further Analysis" map. Those areas include Horse Mountain, Abajo Mountains, Dry Mesa, and Milk Ranch Point. How can these areas, which are supposed to be roadless and relatively untouched by man have areas with low scenic integrity included? I repeat: "Existing scenic integrity (ESI) is defined as the current state of the landscape, considering previous human alterations." (SMS p.I-2-Case Study)

The Flow Chart on page 6 of the SMS shows that "Constituent Information" is required for most phases of the process of determining the Scenic Integrity Objectives. Without maps showing each step of the process, the public is in the dark and cannot provide intelligent comments on decisions made by the Planning Team. Please provide the necessary maps - especially a Seen Area map for the Monticello Ranger District.

One additional note: On the maps provided almost all of the roads are designated for "high clearance vehicles." I haven't had any trouble driving my Prius (3 ½" ground clearance) on the primary road system that is maintained by the County. These maps should be more realistic.

Sincerely,



Owen Severance

c: Regional Forester