

Emery County Public Lands Council



January 5, 2021

USFS
Ryan Nehl
Price, Utah 84501

Dear Mr. Nehl,
Emery County agrees with the need to change the Manti-LaSal Forest Plan, and has participated in the planning process thus far as a cooperating agency. We appreciate the opportunity to offer comments at this time.

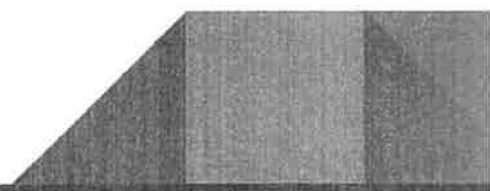
1.2.2 Based on Resource Management Themes

Recreation Management

Recreation activity has changed dramatically in the Forest since 1986. The manner in which the public recreates and the dramatic increase in numbers of visitors creates the need to evaluate, quantify and make management decisions which ensures the vitality of the natural resources which Emery County residents, and others, depend upon from the Forest. Though all resources are extremely valuable, watershed health is tops. All resource use, including recreation must be viewed through the lense of watershed health.

Access and Transportation Infrastructure

The Forest Service road and trail maintenance funds have been inadequate for a while. Emery County has partnered with the Forest in the past with road and trail maintenance, but has limited funding as well. User groups and stakeholders provide many hours of volunteer efforts to keep trails open. Strategic planning to prioritize maintenance and evaluate access and transportation needs in the future is also vital. Other partnerships and funding methods should be developed.



Watershed Health

This is top priority for EC. The communities in the western part of the county are completely dependent on runoff from the Forest for municipal, agricultural and industrial water resources. All activity on the Forest impacts watershed health, and should therefore be evaluated consistent with EC's 'no net loss of watershed health' standard. **Emery County General Plan 8.4**

Rangeland Health

EC agrees that the plan allows flexibility in rangeland management to better allow effective management under changing conditions. On-the-ground application of flexibility should be exercised in time-sensitive circumstances which are dictated by recent/current conditions. Decisions regarding livestock grazing should be consistent with the Emery County General Plan (9.2 Livestock Grazing).

Energy and Minerals Management

EC questions the need to review coal leasing unsuitability criteria. The 'need' to determine unsuitability may be the result of a national trend to eliminate coal production, rather than a legitimate need to evaluate the leasing of this valuable resource. The statement that there is an intent "to identify areas for withdrawal, as appropriate" is indicative. Decisions concerning coal and other extractable resources should be consistent with the Economic Development statement in the EC General Plan (8.15).

Desired Conditions (FW-WATER-DC)

01 Disturbance features reflect inherent watershed stability. EC assumes this is consistent with its no net loss of watershed health standard.

2.15 Fire and Fuels Management

In recent years, Emery County Communities have been heavily impacted by catastrophic fire on the Forest. The fires have been the result of both weather related conditions and past management practice. EC is encouraged by efforts to address fuel loading by implementing the

Canyons timber/fuels project. Fire and fuels decisions should be consistent with the Emery County General Plan (9.3 Air Quality and 9.4 Fire Management, Protection and Prevention).

To that end, it would be inadvisable to consider or recommend designation of wilderness for areas on the Northern Manti-LaSal. Many of the areas which have been evaluated are in need of extensive fuels treatment. Wilderness designation would make that unworkable. No areas should be carried forward in the wilderness evaluation process.

Best regards,

A handwritten signature in cursive script that reads "Rod Player".

Rod Player

Emery County Public Lands Committee, Chairman