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# CITY OF MOAB UTAH

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October 13, 2021

To: Manti-La Sal National Forest Supervisor's Office  
599 West Price River Drive  
Price, UT 84501

To Whom It May Concern:

The Moab City Council would like to express their support for the Conservation Alternative to be considered fully and equally in the Draft EIS for the Manti-La Sal Forest Plan Update scheduled for 2022. The Council believes there are many aspects of the Conservation Alternative that warrant full consideration as a means to the conditions that are in the best interests of the City of Moab and our larger community.

Specifically, we would like to draw attention to the watershed protections, climate adaptation plan, opportunities for enjoyment of recreation in a quiet environment, habitat and wildlife protections, and the encouragement of independent science on the Manti-La Sal. Our watershed is essential to our continued enjoyment of life in Moab, and the community in the City and Spanish Valley depend on the aquifer recharge and filtration provided by the water that falls on the La Sals.

The La Sals offer a wide variety of recreational opportunities which are of primary importance to both Moab residents and businesses. We think a top planning priority is to fairly allocate recreational opportunities amongst various groups, even as use numbers increase. We hope that hikers, bikers, jeepers, UTVers, skiers and others will all have ample recreational opportunities in the La Sals. In particular, we ask that you consider the noise impacts of on- and off-road motorized vehicles as a user conflict area, rather than limiting the consideration of conflict to the narrow strip of physical interaction on roads. This will not happen by accident; it will require a careful "zoning" approach by the USFS.

Given the loudness and growing popularity of UTVs, snowmobiles, and dirt bikes we think that a reasonable percentage of the planning area should be more than one mile from roads. The present road network is not the result of a careful planning process that kept recreational opportunities in mind. Intentional goals and design are an opportunity for the USFS to implement travel planning that will serve us well decades into the future. It is our understanding that roughly 69% of the La Sals in USFS land is within half a mile of a motorized route and less than 8% is more than a mile from a motorized route. This does not seem balanced to us. We hope that future travel planning will result in 15% of the area or more being more than a mile from a motorized route and 40% more than half a mile from a motorized route. Much of the east side of the La Sals has been managed and promoted for motorized recreation, and we hope the USFS managed lands can balance the recreational allocation.

Further consideration of the identified possible wilderness zones could contribute significantly to the above goals. It appears that the south edge of the zone encompassing the north La Sal peaks may include the Burro Pass trail. We encourage you to conduct a robust stakeholder process regarding possible use changes for this high use trail and we support the inclusion of bike recreation in the

analysis. We also support the Research Natural Area provisions in the Conservation Alternative as proposed, and in addition, encourage you to allow independent science and research to take place on the Manti-La Sal, in all areas as appropriate. Our mountains are under-studied, and we will all benefit from more knowledge of the ecological and geologic processes taking place in this area critical to the wellbeing of its and adjacent natural and human communities, especially the City of Moab.

Climate change adaptation and resilience are of great importance to the City of Moab and our community at large. Measures targeting this area will contribute not only to the City's ongoing provision of safe and reliable drinking water for our customers, but also a beautiful place to recreate, habitat for wildlife, and an important carbon storage area. We ask that you make this a priority for the new plan, including wildfire preparedness and smart forest planning to allow for healthy fire to be a management tool without being a disaster. Maintaining the current species mix of conifers and a healthy understory is paramount to the continued resiliency of our forest, and we hope you are prioritizing this goal. Additionally, we strongly support the Conservation Alternative's proposal to adjust, annually and early, recreational fire, grazing, and other uses, based on drought levels, to reduce the harm to our watershed from human-caused wildfire and overgrazing, such as have previously impacted the La Sals.

Allowing grazing and unregulated dispersed camping to degrade the crucial areas of our upper watershed is contrary to the best interests of our community, and we ask that you consider removing these uses from the Moab Geographic Area, as detailed in the Conservation Alternative. In addition, continuing to allow bear pursuit hunting in areas where many more people go to enjoy quiet recreation opportunities is dangerous and contrary to allowing multiple use. Even if the USFS chooses to continue to not exercise its right to manage wildlife, the use of packs of unleashed dogs by a tiny fraction of forest users for this activity can be regulated. Introduced and exotic mountain goats should be removed from the forest due to their ongoing damage to the delicate alpine ecosystem, and Mt Peale Research Natural Area.

Thank you for your ongoing work across several years and multiple Manti La Sal and Washington, DC leadership changes. As you have noted, the Forest Plan is due for revision. We wholeheartedly agree, especially in light of changing use and the changing climate, and the critical importance of the La Sals for our water, residents and visitors, and economy. We appreciate and support the creation of the Moab Geographic Area as a tool to manage the unique values and resources on the west face of the La Sals. And, we greatly appreciate the ongoing opportunities to engage with the Forest Plan Revision, and the responsiveness of USFS staff.

Sincerely,



Emily Niehaus  
Mayor of Moab