First I would like to note that I have read the Conservation Alternative that has been put together by several environmental groups. It is an impressive document that shares many of the conservation strategies of the Forest Service document and many others that should be analyzed by the Forest Service in the Draft EIS. This allows citizens to compare alternatives in the Draft EIS document so that they can provide more informed comments on that document, and it allows the Forest Service to carefully review alternatives to their proposed management strategies.

I will focus my comments on the watersheds of both Castle Valley and Spanish Valley that are contained in the Moab Geographical Area of the Forest Service Management Plan. Many items in the Forest Service Plan seem to me to be “spot on.” The prioritization of water, the idea of no trans basin transfers of water, no timber production, the closing of non-authorized motorized trails, and so on.

Here are some other important suggestions that I think need to be analyzed in the Draft EIS.

There should be a provision that does not allow oil and gas drilling in the watershed and one that does not allow mining or fracking on Forest Service land in the Moab Geographical Area.

Where there are private lands or mining claims where such provisions cannot apply, there should be a stated priority to buy those inholding whether they are SITLA lands or just private holdings. In this way eventually the watersheds within the Forest boundaries could be protected from these activities.

I noticed the following guideline on page 105 of the Forest’s proposed Forest Plan: “To reduce water quality contamination, grazing should not occur within the management area.” This is suggested as a protection for the Municipal Watershed Management Area for water supply of Blanding and Monticello. This should be guideline in the Draft EIS for the Moab Geographic Area.

In sensitive areas such as these watersheds, there should be a provision for buyouts of grazing allotments such as those that are allowed in the new Bears Ears proclamation signed by President Biden:

“Should grazing permits or leases be voluntarily relinquished by existing holders, the Secretaries shall retire from livestock grazing the lands covered by such permits or leases pursuant to the processes of applicable law.  Forage shall not be reallocated for livestock grazing purposes unless the Secretaries specifically find that such reallocation will advance the purposes of this proclamation and Proclamation 9558.”

Of course, the language would read differently with perhaps the Forest Service Chief replacing “Secretaries” and the criterion for reallocation being that such reallocation will advance the protection of watersheds within the Moab Geographic Area.

Other important suggestions for the Moab Geographic Area are in the Conservation Alternative mentioned above; I will not reiterate those here.

Thank you for your work on the Forest Plan. It is an important document for the Forest Service and for the citizens who depend on these public lands.

Sincerely,

Robert M. O’Brien

Castle Valley, Utah