CANYONLANDS WATERSHED COUNCIL

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October 25, 2021

Manti-La Sal National Forest
Attn: Forest Plan
599 West Price River Drive
Price, UT 84501

Sent via eMail to: mlnfplanrevision@usda.gov

Re: Scoping comments for Forest Plan Revision / Manti-La Sal National Forest

Dear Staff at Manti-LaSal National Forest,

A major focus of Canyonlands Watershed Council (CWC) and Living Rivers (LR) is the health of the watersheds for Moab and Castle Valley. Our comments below concentrate on that part of the proposed Manti-La Sal National Forest Management Plan; the Moab Geographical Area. Thank you for giving our on-the-ground concerns serious consideration.

We like many parts of that section: 1) prioritizing watershed health; 2) no trans-basin diversions of water; 3) limits on dispersed camping; 4) closing of unauthorized motorized routes annually, and; 5) not allowing chaining.

However, we would like to see further consideration of things that are not currently included in that section. In this comment letter we present suggestions that we would like to see addressed in the Moab Geographical Area section of the Draft EIS so that our environmental concerns and cumulative impacts can be thoroughly assessed.

Just as the 1986 plan now seems out-of-date, CWC and LR feels the Forest Service should, in this planning process, anticipate the impacts of climate change as it interfaces with: 1) wildfire; 2) grazing management; 3) watershed/vegetation health, and; 4) the impacts it has on the water supply to the communities below.

Given the recent extent of the Pack Creek fire, for example, the subsequent difficulties in the next few seasons will be: 1) altering grazing activity in areas impacted by this fire, and; 2) the quickening impacts of climate change and the consequence of mega-drought.

Is it time to consider reduced grazing or not allowing it, as suggested in the Blanding Monticello Municipal watershed?[1] CWC and LR believe this Forest Plan Revision is indeed the appropriate time to consider this action; waiting another 30-years will be much too late.

CWC feels oil and gas development and mining are not appropriate uses for the Moab Geographical Area, and should not be permitted for reasons that this watershed is a designated sole-source aquifer.

Additionally, old mining claims, undeveloped private lands and Lands owned by SITLA should be acquired by the Forest Service, whenever possible.

There should be some language that sets limits on prescribed fires in the Moab Geographical area. This could involve size limits such as no more than 10% of the watershed in any given year. It is also appropriate to consider community involvement in the decision to conduct such treatments.

Furthermore, we are strong supporters of EIS regulations that require the evaluation of all reasonable alternatives made during the scoping period. Those regulations are designed to make sure that a diverse set of alternatives is evaluated during the EIS process. Consideration and evaluation of such proposals is a central feature of the EIS process and in line with Forest Service regulations.

The Forest Service is responsible for decision-making in the production of the Final EIS for the Forest Plan. So far we do not know what comments will be submitted by citizens, but we are aware of a comprehensive plan that is being presented by several conservation groups. This proposed Conservation Alternative, on the whole, seems to contain reasonable alternatives, not only for the Moab Geographical Area, but for the Forest as a whole. We think these alternatives, as well as our own, deserve to be evaluated in the Draft EIS so that citizens have a better understanding of the strengths, weaknesses and environmental impacts of these management alternatives.

We thank the Forest Service team for all of its work during this EIS process, and guiding the community through this process, and for your inclusion of the Moab Geographical Area, which highlights the importance of the watersheds of Moab and Castle Valley.

Sincerely, John Weisheit

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[1] Page 105 of the Forest Service draft plan under review in this scoping period.