

October 25, 2021

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

To Whom It May Concern:

Thank you for this opportunity to provide comments during the scoping phase for the Manti-La Sal National Forest Plan (Forest Plan) revision.

The Nature Conservancy (Conservancy) is a non-profit organization with a mission to protect the lands and waters upon which all life depends. The Conservancy is the world's largest conservation organization, with approximately one million members. Working with public and private partners across the country and around the globe, the Conservancy has helped protect more than 119 million acres of land and thousands of miles of rivers worldwide. We have been active in Utah for over 35 years with conservation projects throughout the State, and the completion of 225 conservation projects and the protection of more than one million acres of public and private land. The Conservancy's Utah programs are supported by more than 5,700 members, 800 volunteers and an active board of 25 business and civic leaders.

Over the past three decades we have worked jointly with the Manti-La Sal Forest on several initiatives, such as identifying and helping to establish five Research Natural Areas, and inventory and monitoring of several rare plant species. The Conservancy also operates our Dugout Ranch cattle herd on the Cottonwood Allotment in the Abajo Mountains.

Proceeding from this background, our top issue with respect to the Forest Plan is the maintenance of key ecological and biological resources. The most important resources of this type to be maintained or enhanced in the Forest Plan are: (1) special-status plant and animal species (i.e., listed T or E, and Sensitive); (2) freshwater systems such as perennial streams and river segments, including both the quantity and quality of their waters; (3) rare or underrepresented ecological communities such as high-quality riparian areas; and (4) habitat for native wildlife. These resources may be maintained or enhanced through the following methods which should be considered in the Forest Plan.

- Research to understand sustainable levels of use including grazing by cattle and wildlife in the face of a changing climate.
- Forest health and resilience activities to improve water quality and quantity.

- Designation of additional Research Natural Areas, including specific management plans to evaluate Sinbad Ridge for RNA status, and designate it as such if appropriate.
- Improving flows in the rivers and streams of the watersheds in Manti La Sal Forests including but not limited to natural infrastructure (e.g. beaver dam analogs), fish passage, riparian and wetlands restoration, etc.
- Natural climate adaptations to store carbon and promote healthy soils.
- Increased management of recreation including the following:
 - Road/route designations that avoid locations of special-status species for which roads or proximity of vehicles have been identified as a stress factor.
 - Limiting dispersed camping areas and ensuring they are not placed in locations of special-status species for which proximity of vehicles and people have been identified as a stress factor.
 - Prohibiting organized recreational events (such as “Adventure Races”) within Research Natural Areas.
 - Implementing a comprehensive trail plan for the Moab Ranger District that includes the avoidance of special-status animal (wildlife) habitats and of special-status plant locations.
- Inventory, treatment, and reclamation of areas of invasive, nonnative plants and animals, including actions to prevent new occurrences through education and cooperation with recreation, hunting and stock user groups.

This concludes our comments on the Forest Plan revision materials that have been prepared and released to date. Thank you for considering these scoping comments during your process to revise the Manti-La Sal National Forest Plan and for also considering them as you continue through the subsequent stages of the Forest Plan revision process.

Sincerely,



Susan Bellagamba
Canyonlands Regional Director
The Nature Conservancy

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