482 12th Avenue

Salt Lake City, Utah 84103

October 25, 2021

mlnfplanrevision@usda.gov

Manti-La Sal National Forest Supervisor’s Office

599 West Price River Drive

Price, UT, 84501

Dear Sir;

Thank you for the opportunity to comment on the revised forest plan for the Manti-La Sal National Forest.

The Stonefly Society Chapter of Trout Unlimited located in Salt Lake County has many members who value resources contained in the Manti-La Sal National Forest. We are particularly concerned with the Fish Creek/Price River, Huntington Creek, Cottonwood Creek and Duck Creek watershed areas.

The Wasatch Plateau and the Skyline Drive are remarkable resources that deserve the highest possible protection.

As an example, there are perhaps 20 small transbasin diversions mainly above Joe's Valley Reservoir, but also above Scofield. It is not clear how they operate. Some are well maintained and other are not. During wet years with high runoff, water in excess of actual use might be being diverted to the Sanpete Valley. During dry years with low flow, much of the diverted water might be lost to porous diversion canals and never make it to the Sanpete Valley.

The operation of these systems has not been included in the forest plan.

Scofield Reservoir is important as both a recreational and water supply facility. It has water quality problems and it is not clear that your document deals with risk to this important reservoir. We have worked to support flow protection on Gooseberry Creek. Many years ago, the forest service tried to implement protective insteam flows on Gooseberry Creek. With the demise of the Gooseberry Narrows water project, we are concerned that any redesigned project provide adequate instream flow protections for Gooseberry Creek.

In the past Wild and Scenic protection was not recommended for Gooseberry/Fish Creek. Again with the demise of the Narrows Project, we feel that this issue should be revisited.

On page 17, you state the following:

“Objectives (FW-RMZ-OB)

Over the planning period, restore at least 300 acres of riparian areas or associated wetlands.

Complete a minimum of 25 acres of aquatic habitat restoration every 5 years for the life of the plan to benefit aquatic habitat for At-Risk Plant and At-Risk Animal species.

Improve or restore a minimum of 50 stream-miles for aquatic species habitat every 5 years.”

This is a wonderful plan and deserves support. How exactly are going to do this? And where will these efforts be located on your lands? As above, areas in the watershed of Scofield Reservoir should be targeted for targeted for these efforts.

On page 18, you state the following:

“Objectives (FW-WETLAND-OB)

Restore native vegetation and natural water flow patterns on at least five acres of wetlands every five years.

Field validate the Forest Fen report within ten years.

Restore or improve groundwater-dependent ecosystem hydrologic and ecological function on a minimum of one acre every five years to provide ecological conditions suitable for At-Risk Plant and At-Risk Animal species.

Improve at least one water resource feature every five years.”

Again, this is a wonderful plan and deserves support. How exactly are going to do this? And where will these efforts be located on your lands?

If you cannot be specific, a list of high priority areas would be appropriate to include in the document.

Your document needs to confront two important issues that Utah is facing: population growth and climate change.

Buried within some of the supporting documents, there is mention of climate change, but population growth is not.

Utah’s national parks, forests, national monuments, and BLM scenic areas are seeing greatly increased human use due to Utah’s growth and tourist visitation. The Manti-La Sal will also see increased use. One example of this visitation increase is dispersed camping. Much of the Manti-La Sal is open to dispersed camping. This use is in direct conflict with your need to protect both water quality and landscape health.

As an example a number of years ago, we supported a substantial reduction in dispersed camping along Huntington Creek.

Sincerely,

Justin Grover

President, Stonefly Society Chapter Trout Unlimited

Fred Reimherr

Conervation Chair, Stonefly Society Chapter Trout Unlimited