

From: [Richard Spotts](#)
To: [FS-comments-intermtn-manti-lasal-forest-plan-revision](#); [FS-comments-intermtn-manti-lasal-forest-plan-revision](#)
Cc: [Ela, Autumn -FS](#); [FS-comments-intermtn-regional-office](#)
Subject: [External Email]My scoping comments for preparation of the Manti La Sal National Forest plan revision DEIS
Date: Sunday, October 24, 2021 11:06:57 AM
Attachments: [Vilsack Oct 2021 Drought Coalition Letter Response.pdf](#)
[Recreation Report Sept 2021.pdf](#)

[External Email]

If this message comes from an **unexpected sender** or references a **vague/unexpected topic**;
Use caution before clicking links or opening attachments.
Please send any concerns or suspicious messages to: Spam.Abuse@usda.gov

October 24, 2021

RE: My scoping comments for preparation of the Manti La Sal National Forest plan revision Draft Environmental Impact Statement (DEIS)

Dear Forest Service officials:

Please accept, carefully review, respond to in the DEIS, and include in the relevant administrative record my following scoping comments and associated attachments on the proposed revision of the Manti La Sal National Forest Plan.

I am a nearly twenty-year resident of Utah, and I use and enjoy Forest Service and other federal lands in Utah and throughout the West. I deeply care about these federal lands, and I believe that most federal land managers give excessive deference to local commodity interests (logging, grazing, mining, etc.) in a manner that undermines long-term resource sustainability. These federal lands belong to all Americans and they should be managed not for short-term and narrow local needs but rather for long-term and broader sustainability in the national interest.

The rapidly worsening climate and extinction crises, coupled with the extreme mega drought, clearly indicate that the status quo management methods and approach of the past are no longer appropriate or sustainable. Fundamental management reforms are urgently needed. Native plant and wildlife species are already suffering under significant, cumulative, and adverse environmental impacts and drought-related stresses. Ecological systems are changing and native species are struggling to adapt to those changes.

I have reviewed some of the Forest Service planning materials as well as the proposed "Conservation Alternative". In general, I believe that the Forest Service planning materials reflect too much of the status quo methods and approach of the past, and do not include the reforms that are needed now and into the future. Think about all that has changed since the current forest plan was adopted over three

decades ago. Now think about how long the new or revised forest plan may be in effect and what changes are likely to occur during that time and require adequate Forest Service responses. In this light, I believe that the comprehensive "Conservation Alternative" is far better than what the Forest Service is currently proposing and likely favors.

For example, in the Federal Register Notice of Intent that started this scoping process, I noted the seven described themes for plan revision. These themes tend to follow the status quo approach for categorizing resources and uses. However, this approach separates resources and may miss the obvious connections and relationships among them. It is not clear where, how, or whether highly relevant themes like climate change resilience, biodiversity protection, landscape connectivity, and watershed health would fit within this traditional approach. Yet all of these topics must be included and factored into the NEPA analysis. This omission is merely one example of how the Forest Service clings to the past when it should be actively striving to look to the future. It is imperative that the Forest Service fully and objectively analyze the "Conservation Alternative" in the DEIS, and fairly compare it to what the Forest Service proposes. If the Forest Service fails to do so, it would demonstrate profound bias, disrespect the hard work in good faith that went into preparing the "Conservation Alternative", and should constitute a "fatal flaw" in the NEPA analysis because an otherwise feasible alternative was not carried forward.

A coalition of conservation groups recently sent a letter to USDA Secretary Vilsack asking him to adopt urgent reforms to address the management of commercial livestock grazing on Forest Service lands during this mega drought. His vague response is attached. Note that he urges these conservation groups to raise their requested reforms during forest plan revision processes. This is relevant because the "Conservation Alternative" includes these recommended reforms for commercial livestock grazing. If the Forest Service does not fully and objectively analyze these recommended reforms in the Manti La Sal DEIS it would directly conflict with Secretary Vilsack's response that this is where such reforms should be considered.

I've hiked along some stream corridors and seen how livestock grazing can significantly destroy, degrade, and fragment those corridors' ecologically important riparian habitats, and how the cattle can harm water quality and create e coli contamination in public waters. Whether through permitted use or chronic trespass, the Forest Service does not adequately protect riparian, wetland, and aquatic habitats from the significant cumulative impacts from commercial livestock grazing. These habitats are disproportionately important to most native species in the West, and increasingly rare during the mega drought. The Forest Service must stop pandering to ranchers and start doing a much better job of protecting and

restoring these habitats.

The forest plan revision includes public access, transportation planning, and recreation management. These interrelated topics combine to be relevant in the context of the scientific disciplines of landscape ecology and conservation biology. Many studies have shown a clear correlation between the density of roads and routes on the landscape and harmful effects on sensitive wildlife species. The higher the road and route density, the greater the impacts. In addition, at a watershed level, higher road and route densities tend to increase soil erosion, sedimentation, and water quality problems. For the DEIS, it is important that the alternatives analysis accurately describes what road and route density would result from implementation of each alternative, and what associated resource impacts would occur. In general, the Forest Service should strive for the lowest feasible road and route density possible, and to close and rehab roads and routes that are redundant, no longer used, or causing serious resource impacts. Aside from the environmental benefits, doing so would help the Forest Service have the capacity to properly manage and maintain the remaining roads and routes given the huge existing backlog of such work.

Please carefully review the attached recreation report. It is very relevant and should assist you in your planning and in preparing the DEIS. Recreational uses are increasing and it is important to properly limit and manage recreational uses so that they do not cause long-term resource damage or threaten sensitive wildlife or plant species.

I hope that my scoping comments and the attachments are helpful. Please keep me on this notification list at the contact information below.

Thank you very much for your consideration.

Sincerely,

Richard Spotts
255 North 2790 East
Saint George Utah 84790
raspotts2@gmail.com

cc: Interested parties

Attachments: Vilsack Response and Recreation Report