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Comments: The state of Utah has reviewed the Draft Manti-La Sal National Forest Plan. The State commends the Forest Service for taking active management measures to improve the public lands grazing infrastructure, and subsequently, improve domestic livestock grazing practices within Utah. Livestock and Grazing endures as significant for the benefits it provides industry and local government and communities. The Forest Service must coordinate the proposed forest plan with the State of Utah Resource Management Plan, as well as the relevant portions of Carbon, Emery, Grand, San Juan, Sanpete, and Sevier counties' Resource Management Plans in accordance with the National Forest Management Act of 1976. In collaboration with the Department of Agriculture and Food (UDAF), the State provides the attached pre-scoping technical comments.

The State looks forward to continually working with the Forest Service to create a forest plan that provides balance in protecting the natural resources while meeting multiple use obligations. Please direct any written correspondence to the Public Lands Policy Coordinating Office at the address below, or call to discuss any questions or concerns.

#### Technical Comments

#### Chapter 2, Forest-wide Direction

#### 2.6 Vegetation Communities and Resources

##### 2.6.2 Deciduous Forest: Description and Values, page 31

The Forest Service should edit the third sentence to read [ldquo]Stable aspen clones, ranging in age from 60 to 150 years are valued for their beauty, habitat diversity, importance to wildlife, hydrologic benefits, and forage for domestic livestock.[rdquo]

#### Chapter 2, Forest-wide Direction

#### 2.10 Recreation and Access

##### Guidelines FW-REC-GD-04, page 58

The Forest Service should edit the Guideline 04 to read [ldquo]Developed recreation sites should be fenced where feasible and possible to exclude livestock grazing.[rdquo]

#### Chapter 2, Forest-wide Direction

#### 2.16 Livestock Grazing and Range Management

##### Guidelines, FW-RANGE-GD-01 and 02, Page 80-81

UDAF requests the Forest Service eliminate entirely from the forest plan the specific utilization rates and stubble heights. It is inappropriate to implement specific utilization rates and stubble heights at the forest-wide level. Otherwise, if the Forest Service retains this language in the plan, UDAF recommends the Forest Service move Guidelines 01 and 02 to the Management Approaches within the Livestock Grazing and Range Management section. As well, the Forest Service should change the utilization rate to 40%-60%. The Forest Service should

also define and clarify [ldquo]long-term monitoring.[rdquo]

Overall, UDAF appreciates the information included in the Livestock Grazing and Range Management section and commends the Forest Service for working collaboratively when compiling this section.

## Chapter 3, Specific Area Direction

### 3.1 Designated Areas

#### 3.1.1 Wilderness Areas, page 87

This section lacks action related to the management of livestock grazing in wilderness areas. UDAF recommends the Forest Service include language that recognizes the authorization of allowing livestock grazing to occur in wilderness areas. The Forest Service should include language which allows for access to the livestock grazing allotments within the wilderness areas and maintenance of range improvements to ensure appropriate functioning condition. Livestock grazing contributes to the cultural heritage of the land, and occurred in the area long before Wilderness Area designation. Moreover, livestock grazing can be an effective management tool for treating noxious weeds. The Forest Service should recognize livestock grazing as an authorized use rather than just citing the Wilderness Grazing Checklist.

## Chapter 3, Specific Area Direction

### 3.1 Designated Areas

#### 3.1.3 Research Natural Areas, page 90

Similar to the Wilderness Areas section of the Forest Plan, the Research Natural Areas section the Forest Service should include management directives for livestock grazing. This would help show that grazing is permitted and authorized in these areas and also allow management actions to be taken which would benefit the rangeland. This includes maintaining range improvements and allowing proper access to the grazing allotments.

## Chapter 3, Specific Area Direction

### 3.1 Designated Areas

#### 3.1.6 Mont E. Lewis Botanical Area

##### DA-LEWIS-ST-02, page 96

It is unknown if livestock grazing is authorized in the Botanical Area. If livestock grazing is excluded from this area, the Forest Service should explain why.

## Chapter 3, Specific Area Direction

### 3.4 Geographic Areas

#### 3.4.4 Moab Geographic Area

##### GA-MOAB-GL-01, page 116

UDAF commends the Forest Service for the language contained in this goal. The language supports the purpose

and need of the multiple use-sustained yield mandate and benefits multiple forest users.