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Comments: Up front, we want to thank the Forest Service for the special protections offered for the Moab and Castle Valley watersheds in the initial proposal of the Forest Plan (The Moab Geographic Area section). The Forest Service HUC that includes these watersheds offers some special protections for both watersheds.The scoping period is a time for citizens to comment on the Forest Service's initial Forest Service Plan and to suggest reasonable alternatives to be included and evaluated in the subsequent Draft EIS. We urge the Forest Service to evaluate in its forthcoming Draft EIS all reasonable alternatives. These include not only those in its own initial proposal, but those supplied during the scoping period.In particular, there is a Conservation Alternative (www.mantilasalconservationalternative.org) that represents the joint work of ten conservation groups. These alternatives as a whole are reasonable and worth being evaluated side by side with the initial proposals contained in the Manti-La Sal Forest Plan that were sent out by the Forest Service for scoping. Consideration of such proposals is in line with Forest Service regulations regarding EIS procedures that require the Forest Service to consider reasonable alternatives and compare their alternatives with those reasonable alternatives.Including such proposals by citizens and by The Conservation Alternative in its entirety assures that the Forest Service considers and analyzes a wide range of alternatives and their environmental impacts in the forthcoming Draft EIS. Considering all reasonable alternatives in the EIS process for the Forest Plan is how an EIS process should be conducted.The Town of Castle Valley, not surprisingly, is especially interested in how the Forest Plan impacts our watershed, and we appreciate the special protections offered to our watershed by the Moab Geographical Area provisions of the initial proposed plan. Below, we cite some alternative examples that should be considered by the Forest Service and compared with other proposals in the Draft EIS.Section on Climate Adaptation: The health of the Manti-La Sal National Forest above Castle Valley is being severely impacted by the ongoing extreme drought. Aspen, pinon and ponderosa are succumbing to the drought as indicated by diseased, dying and dead trees. The current condition of the forest increases the potential for catastrophic wildfire, habitat loss and flooding and climate studies show that the drought will continue for years to come. It is important that the Forest Service's plan include short- and long-term strategies for climate adaptation and drought mitigation.Section on Coniferous Forest: As mentioned above, the health of the coniferous forest is being degraded by effects of the extreme drought. Management techniques should be based on the current science and updated to reflect the changing climate conditions.Section on Moab Geographical Area: One major omission in the Forest Service's plan is the prohibition of mining, fracking and oil and gas drilling in the Moab Geographical Area. Castle Valley's aquifer has been designated by the EPA as "Sole Source", and any of these activities could severely degrade or permanently damage Castle Valley's source of drinking and irrigation water. Watershed protection should be prioritized over any recreation or economic value.Section on Municipal Watershed Management Area: The residents of Castle Valley rely on our Sole Source Aquifer for drinking and irrigation water. To increase the protection of all watersheds in the Moab region, more urgent and specific actions are needed than what is outlined in the Forest Service's plan. For example, the Forest Service's plan takes up to ten years to implement a strategy that improves or maintains the watershed. Protection of one our region's most valuable resources should be a top priority and should be developed and implemented in a much shorter timeframe. Options for reduced grazing in our watershed should also be considered in the Draft EIS.Section on Fire and Fuels Management: As the population of Castle Valley increases and the current extreme drought continues into the future, more of our residents, as well as our watershed, become vulnerable to catastrophic fires. Castle Valley has had success working with the Bureau of Land Management in developing fire mitigation plans that reduce fire danger, increase the resiliency of the landscape, and prioritize native plants. The BLM has also been receptive to community concerns and guidance and has accepted feedback after implementation of the plans. A statement of working with the Town of Castle Valley on the specifics of fires and fuels management in our watershed should be considered in the Draft EIS.Section on Deciduous Forests; Aspen groves are an important part of the forest in Castle Valley's watershed and make up a significant percentage of the trees in this area. At this point, many of the aspen groves are diseased and dying, and are not reproducing sufficiently to

rejuvenate. The causes for this poor health are varied, but include damage from grazing animals, both native and introduced. The Town would like for the Forest Service to put the health of aspen stands at a high priority by implementing restrictions on grazing within our watershed, whether from cattle, goats, elk or deer.Considering these and other management options side by side in the Draft EIS will give citizens a better chance to offer informed comments during the Draft EIS process.