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Comments: Please see the attached document for the comment of the Maryland Ornithological Society concerning on the Manti-La Sal National Forest Land and Resource Management Plan #50121.

October 24, 2021

U.S. Forest Service

Submitted electronically at: <https://cara.ecosystem-management.org/Public/CommentInput?project=50121>

Dear Forest Service:

The Maryland Ornithological Society (MOS) appreciates the opportunity to comment on the Manti-La Sal National Forest Land and Resource Management Plan #50121.

MOS is a statewide nonprofit organization established in 1945 and devoted to the study and conservation of birds. Currently we have 15 chapters and approximately 1,500 members. Every year MOS members travel throughout the United States on birding and nature-watching vacations. We spend dollars on food, lodging, guide services, books and souvenirs to support the local economy wherever we go. Birding is one of the fastest-growing outdoor recreational activities. Our members have visited Manti-La Sal to enjoy the diverse avifauna that inhabit the area.

MOS favors the "Conservation Alternative" proposed by conservation organizations that seems best designed to protect wildlife habitat and the habitat used by the bird species we admire.

Bird Values - 202,825 acres of Manti-La Sal National Forest fall within the Canyonlands Important Bird Area. This designation by the National Audubon Society is primality due to the habitat it provides for the Mexican Spotted Owl. The Mexican Spotted Owl is listed as Threatened under the Endangered Species Act.[1] Other notable species concentrated along the riparian corridors are Great Blue Heron, Coopers' Hawk, Canyon Wren, Yellow-breasted Chat, Spotted Towhee, and Blue Grosbeaks. The grassland areas are used by Say's Phoebe, Black-throated Sparrow, and Western Meadowlark. Pinyon-juniper forests are used by Pinyon Jay, Woodhouse's Jay, Juniper Titmouse, and Black-throated Gray Warbler. Some 200 species have been noted in the Canyonlands IBA.[2]

Wilderness - In particular, MOS favors the Conservation Alternative's wilderness recommendations. This will preserve a broad array of ecosystems and habitats, and hold some the most remote and pristine back country on the Colorado Plateau. Many of those recommended areas have already been proposed in Congress as part of America's Red Rock Wilderness Act (S.1535, H.R.3780, 117th Congress).

Vegetation Removal and Old Growth - MOS asks that native vegetation, especially pinyon pine and juniper forests, be managed for wildlife, in particular for the birds such as the Pinyon Jay. The Pinyon Jay has declined by 85% since 1970, and are projected to lose another 50% by 2036. These declines are caused by conversion of pinyon-juniper forest to grazing lands, and fire suppression.[3]

We further urge that areas with Old Growth of trees of 150 years or more be protected and that younger forests be encouraged to mature to become Old Growth.

Recreational Values - The new forest plan should recognize that recreational values in the Manti-La Sal go far beyond off-highway vehicle (OHV) activities. The area is near Canyonlands and Arches National Parks, which are important destinations for recreational visitors. In the years ahead, the crowded conditions in Canyonlands and Arches will increasingly lead visitors to seek more remote, wildland experiences in the Manti-La Sal. In hot summer weather, visitors will want to avoid the lower elevations of Canyonlands and Arches and seek the cooler temperatures at higher elevations in the national forest. The new forest plan should keep OHVs away from places that are popular for non-motorized recreation such as wildlife watching, photography, hiking, river running, canyoneering, climbing, and mountain biking.

Sky Islands - As can be seen above, portions of Manti-La Sal are sky islands, high altitude refuges for specialized plant and mammals, such as the collared pika. These higher, cooler altitudes may also provide refuge for other species as lower elevations become hotter and drier due to climate change.

Dispersed Camping - The forest plan should identify all places where dispersed camping, outside of designated campgrounds, is creating unacceptable impacts against wildlife habitat and recreational values. The plan should include measures to curtail such impacts, either by closing areas to dispersed camping or by closing OHV routes that lead to abused areas. It should explain how the Forest Service will restore the damaged landscapes

Unauthorized Routes - There are many miles of unauthorized travel routes on the Manti-La Sal, which have been used by OHVs. The new forest plan should provide for closing all unauthorized routes, installing barriers to prevent trespass, and rehabilitating the damaged wildlife habitat.

Livestock Grazing - Livestock grazing is permitted on nearly the entire Manti-La Sal National Forest at a level of 60% utilization, a jargony term that refers to how much of a plant may be consumed. Reducing the amount of grasses, wildflowers, and shrubs that are consumed would have far-reaching benefits for native plants, wildlife, and fragile water sources. The best available science shows that 30% utilization is not only better for the health of the land, but also is better for the economics of grazing.[4] MOS supports a grazing standard of 30% utilization.

Arch Canyon - In particular, MOS supports wilderness designation for the Arch Canyon unit, No. 20 in the Forest Service's wilderness evaluation (Appendix C, page 21). The unit includes the upper reaches of Arch Canyon and the mesas surrounding it, with a total of around 20,000 acres. The evaluation found this unit to be "high" on all the criteria applied. MOS members visited the BLM-managed lower reaches of Arch Canyon and saw damage caused by OHVs, including trampled riparian vegetation and oil pollution in Arch Creek. MOS recommends that the entire Arch Canyon complex, including the FS and BLM parts, be managed for protection of bird and wildlife habitat and for quiet uses such as bird watching and hiking. It is suitable for day hiking and overnight backpacking, and it is recommended in guidebooks such as "Utah Hiking" by Buck Tilton. We urge the Forest Service to bar OHVs from the area, rehabilitate damaged habitat, and manage the area for wilderness values.

In conclusion, MOS requests the Forest Service analyze the Conservation Alternative fully and include it among the alternatives in the draft environmental impact statement (DEIS). We also ask that our points above be included in the DEIS.

Thank you for considering our views.

Sincerely,

Kurt R. Schwarz

Conservation Chair

Attachments:

[1] US Fish and Wildlife Service, Mexican Spotted Owl (*Strix occidentalis lucida*), April 25, 2016, https://www.fws.gov/southwest/es/MSO_Main.html

[2] National Audubon Society, Important Bird Areas: Canyonlands Area, <https://www.audubon.org/important-bird-areas/canyonlands-area>

[3] Cornell Laboratory of Ornithology, Pinyon Jay: Life History, 2019, https://www.allaboutbirds.org/guide/Pinyon_Jay/lifehistory#

[4] USDA, Grazing Management and Soil Health,, Keys to Better Soil, Plant, Animal, and Financial Health, February 2016, https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcseprd621806.pdf