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First name: David

Last name: Erley

Organization:

Title:

Comments: Please see my attached letter. Thank you.

As a two term Mayor of the Town of Castle Valley (2010-2017) a major focus of my work was the health of the watersheds for Moab and Castle Valley. I am very happy that the proposed Manti-La Sal National Forest Management Plan includes the Moab Geographical Area.

I like many parts of that special management area; for example prioritizing watershed health, no trans-basin diversions of water, limits on dispersed camping, closing of unauthorized motorized routes annually, not allowing chaining, and so on. I would like to see further consideration of some things that are not addressed in Moab Geographical Area section of the Draft EIS so their environmental impacts can be assessed.

Just as the 1986 plan now seems out of date, I feel the Forest Service should, in the planning process, anticipate the impacts of climate change as it interfaces with wildfire, grazing management, watershed/vegetation health and the impacts it has on the water supply in the communities below. Given the recent extent of the Pack Creek fire, the subsequent difficulty there will be in the next few seasons altering grazing activity in areas impacted by fire, the ongoing impacts of climate change and drought, is it time to consider reduced grazing or not allowing it as suggested in the Blanding Monticello Municipal watershed (page 105 of the Forest Service draft plan under review in this scoping period)? I believe this Forest Plan Revision is the appropriate time. Another 30 years will be too late!

I worked for the Grand Canyon Trust for 5 years from 2011-16 focusing on Forest Service Management with a great deal of time working on grazing issues. I was struck by the dismal future for allotments with little grazable acres above 7,500 to 8,000 feet. Given the realities of climate change, this just is not going to provide the needed water resources and associated forage to get through the late summer grazing season. You see this on Lake Fork Allotment at the north end of the Wasatch Plateau. You see it on Cottonwood and Twin Springs Allotments on Elk Ridge. In all cases, elaborate ways to increase water resources are proposed by the permittee and the FS due to the ongoing shortage. But this begs the question, if there is not enough water for the cattle, is there enough for the plants and the wildlife? This Forest Plan Revision should address these realities not put custom and culture on a pedestal above environmental and climate change reality.

I feel Oil and Gas development, Fracking, and Mining are not appropriate uses in the Moab Geographical Area and should not be allowed. Additionally, old mining claims, undeveloped private lands and Lands owned by SITLA should be acquired by the Forest Service when possible. There should be some language that sets limits on prescribed fires in the Moab Geographical area. This could involve size limits such as no more than 10% of the watershed in any given year and community involvement in the decision to conduct a treatment.

I am a strong supporter of the EIS regulations that requires the evaluation of all reasonable alternatives made during the scoping period. Those regulations are designed to make sure that a diverse set of alternatives is evaluated during the EIS process. Consideration and evaluation of such proposals is a central feature of the EIS process and in line with Forest Service regulations. The Forest Service is responsible for decision making in the production of the Final EIS for the Forest Plan. I do not know what comments will be submitted by citizens, but I do know of a comprehensive plan that is being presented by several conservation groups. The Conservation Alternative, on the whole seems to contain reasonable alternatives, not only for the Moab Geographical Area, but for the Forest as a whole. I would like to see this alternative evaluated in the Draft EIS so that citizens have a better understanding of the strengths, weaknesses and environmental impacts of these management alternatives.

I thank the Forest Service team for all of its work in this EIS process, guiding the community through this process, and for your inclusion of the Moab Geographical Area that highlights the importance of the watersheds of Moab and Castle Valley.

Sincerely,

David D. Erley