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Comments: I have reviewed the draft Land Management Plan for the Manti-LaSal National Forest and offer the following comments. My comments include those I submitted February 24, 2021, as well as additional comments.

p. 2 1.1.2 Plan Structure

A new plan component, Goals, has been added for most resources. Goals are included in the listing of plan components in the explanation section of Chapter 3 under this title as well as in the Glossary but are not included in the listing/explanation of Forest Plan Elements in this section. It would be helpful to include Goals in the listing/explanation of Forest Plan Elements to aid in better understanding when they are encountered in the resources section of the plan.

p. 21 2.1.3 Groundwater-Dependent Ecosystems and Wetlands

ST-01 "To protect groundwater-dependent ecosystems and wetlands, new road and trail development shall not be authorized." It is assumed that this statement prohibiting new road or trail development would apply without exception to groundwater-dependent ecosystems and wetlands areas throughout the forest. Such a general prohibition on new road and trail development is overly restrictive as it would not allow for mitigation of impacts which may be applicable in some areas. I suggest that the standard be revised to state "New road and trail development shall not be authorized in groundwater-dependent ecosystems and wetlands unless no other alternative exists and a sustainable crossing can be made with appropriate mitigating measures." Such a revision would be more consistent with GD-02 in 2.10.3 Access which states "New roads and trails should be located outside of riparian areas and only cross them in sustainable locations."

p. 51 2.8 Cultural and Heritage Resources

DC-03 "Cultural resources are managed to protect their current condition and the characteristics that make them valuable to tribes, other rural historic communities, and visitors." The phrase 'and scientific study' should be added to the end of this statement to show another important objective for cultural resources management.

p. 61 2.10.1 Recreation Opportunity Spectrum

ST-01 - "New roads and motorized trails shall not be located within the Semi Primitive Nonmotorized and Primitive classes. Existing roads and motorized trails in these classes shall be considered for closure in Travel Planning." The last statement in this standard is inconsistent with DC-06 "Dead-end roads extending into Semi-Primitive Nonmotorized areas are consistent with this desired recreation opportunity spectrum setting." I concur with DC-06 which would allow continued use of such roads/trails as 'cherry-stemmed' routes into nonmotorized areas. The second statement in the standard is also inconsistent with the current Travel Map which has several approved roads and motorized trails in the proposed nonmotorized areas. I strongly support the continued use of these approved roads and trails. The last statement in ST-01 should be deleted.

GL-03 - It is not clear whether the intent of this guideline is to limit or exclude livestock grazing in Semi-Primitive Nonmotorized areas or is meant to limit livestock range improvements. I suggest rewriting this guideline to clarify the intent for livestock grazing.

p. 64 2.10.3 Access

DC-06 "Road and motorized trail use do not impact wildlife winter range and quiet winter recreation opportunities." This DC would allow no impact to wildlife winter range and quiet winter recreation opportunities which is overly restrictive. I recommend replacing "do not impact" with "have minimal impact" in the statement. This would allow reasonable winter motorized trail use with minimal impact on resources.

p. 73 2.14 Minerals and Energy Resources

This section appears to overlook the historic value of older mining operations. These older mining sites may be eligible for protection under the National Historic Preservation Act and are of interest

to many forest visitors. I recommend adding reference of this historic significance to appropriate parts of this section. One such part could be in ST-05 which could be revised to read:

"Abandoned mine lands and mine sites shall be reclaimed, consistent with requirements for protection of eligible sites under the National Historic Preservation Act, to meet assigned scenic integrity objectives, as well as to eliminate hazards, to create stable site conditions, and ensure the long-term health of the Forest resources."

p. 80 2.16 Livestock Grazing and Range Management

ST -04 "In contour trenched or furrowed areas, no new livestock water developments shall be allowed and where feasible, existing water developments shall be removed." Such a broad statement is overly restrictive and should apply only to areas where water developments would contribute to or cause accelerated erosion or are presently contributing to or causing accelerated erosion. I recommend this statement be removed or added as a Guideline for new water developments.

GD-01 and GD-02 (GD-01 "Utilization of key forage species should be no greater than 50 percent of current year's growth, except where long-term monitoring demonstrates a different allowable use level that will meet desired conditions for soils and terrestrial vegetation." and GD-02 "A four-inch or greater stubble height of herbaceous species should be present within riparian management zones at the end of the grazing season, except where ... ")., even though stated as guidelines, should not be included in the Forest Plan as they will be interpreted to be grazing permit standards or objectives to be achieved in grazing plans. Michael Ralphs, in his comments submitted for the San Rafael Conservation District ( and endorsed by the San Juan Conservation District) gave an excellent summary of the history and issues involved in using such statements as standards or objectives and why range management professionals and the Society for Range Management objected to use of these utilization or residue measurements as general, one size fits all guidelines. I recommend that these two guidelines be replaced with the following as drafted by Mr. Ralphs.

GS-OJ ' Utilization guidelines in Annual Operating Instructions (AOI) will be developed using long-term monitoring data and annual indicators such as Rangeland Health analyses, taking into consideration the time and duration of livestock use,[middot] in general, they will be conservative to moderate.'

GD-02 'Stubble height guidelines for riparian management zones in allotment AOI should be developed using long-term monitoring and riparian stability data, taking into consideration the time and duration of livestock use, and should be measured at the end of the grazing season. '

p. 81 Management Approaches

Grazing season 'on' and 'off' dates for specific allotments have been very rigid except in drought when permittees have been asked to move livestock off early. For adaptive management to be fully effective, District Rangers should have the flexibility to adjust 'on' and 'off' dates to adjust to changing climatic conditions and times when abundant forage is available at the end of the grazing season. I recommend that the following statement be

added to the third bullet statement in Management Approaches. This statement would be complementary to GL-01 "Work continually with permittees to adjust the timing, intensity, and frequency of livestock grazing to respond to changing resource conditions and livestock needs of the grazing permittees. "

'Flexibility in season of use may be appropriate to address changes in allotment-specific conditions and to promote successful grazing operations. '

#### p. 81 Management Approaches

The phrase " ... and that the lands are still suitable for livestock grazing." in the seventh bullet statement casts a negative context on livestock grazing. Such a review of suitability of a resource use isn't required in any other resource evaluation. This statement should be rewritten to read "Assess and update allotment management plans to ensure that sustainable stocking levels, forage utilization guidelines, mitigation measures, and appropriate grazing systems are used to maintain or move toward Desired Conditions. "

#### p. 81 Management Approaches

During the 1960s and 1970s, reductions in livestock numbers and season of use were made mid range improvement projects constructed to improve range condition and bring livestock use in line with the carrying capacity of the ranges. It was understood that when the results of these livestock adjustments and projects showed improvement in range condition, restoration of the reductions in livestock use would be considered. This was stated in the 1986 Forest Plan on page 11-39 as "Likewise, when improvements in range condition and carrying capacity occur, increase in livestock stocking can be considered." This was never done but this guidance is still appropriate today. I recommend that the following statement be added to Management Approaches.

"Head Months should be retained at current permitted levels when rangeland conditions are meeting or moving toward desired conditions. Increases in Head Months would be considered when desired conditions are being met and analysis indicates that the increase would continue to meet desired conditions. "

#### p. 87 3. 1.1 Wilderness Areas

DC-10 "Use within the Peavine Corridor in Dark Canyon Wilderness has a minimal effect on adjacent wilderness resources." This statement is inconsistent with the legislation establishing the wilderness area and Peavine Corridor. Nowhere in the legislation is there a requirement that use in the Corridor have minimal effect on adjacent wilderness resources. In fact, Section 303 Prohibition on Buffer Zones in the legislation states "Congress does not intend that designation of wilderness areas in the State of Utah lead to the creation of protective perimeters or buffer zones around any wilderness area. The fact that nonwilderness activities or uses can be seen or heard from areas within the wilderness shall not, of itself, preclude such activities or uses up to the boundary of the wilderness area." This Desired Condition should be removed from the Plan.

#### p. 89 3.1.1 Wilderness Areas

Management Approach - the 2nd bullet statement includes actions that are inconsistent with the legislation designating the wilderness. These include monitoring the Peavine Corridor to determine if use is affecting adjacent wilderness character and considering closing or restricting use if unacceptable impacts cannot be addressed. As noted in the above comment, effects of Corridor uses on adjacent wilderness values are not to be used to preclude such Corridor uses. And consideration of closing motorized use of the Corridor would be totally inconsistent with the legislation establishing the Corridor for motorized uses. This bullet statement, if retained in the Plan, should be modified to read:

"Routinely monitor the Peavine Corridor to determine if use is causing user conflicts or affecting resources within

the corridor. Unacceptable impacts would be addressed as practical and appropriate. "

p. 99 3.1.9 Inventoried Roadless Areas There are no maps depicting Inventoried Road less Areas (IRAs). Maps of IRAs should be added to the maps section of the Plan to aid in better understanding of the location of these areas and their relationship to other management designations.

p. 103 3.1 Recommended Wilderness Management Area ST-06 "Motorized use shall not occur, at any time during the year, within these areas." As written, this standard would not allow motorized use for emergencies such as search and rescue when motorized use may be critical in a life and safety situation or may be necessary in the exercise of valid existing rights. A clarification phrase such as 'except for emergencies or as appropriate in the exercise of valid existing rights' should be added to this standard.

p. 109 3.4.1 Elk Ridge Geographic Area

ST-06 "Road density shall be maintained or decreased." This standard is inconsistent with ST-17 which allows for new motorized roads or trails under certain conditions. New motorized roads or trails should be an option under certain circumstances without having to eliminate other roads or trails to maintain a certain road/trail density. I suggest eliminating ST-06 altogether or eliminating it from Standards and including it as a Guideline.

p. 110 3.4.1 Elk Ridge Geographic Area

ST-17 "New roads or motorized trails shall only be designated if they do not create direct or indirect impacts on cultural resources." This standard is overly restrictive and precludes the option of mitigation of road or trail impacts to cultural resources. I recommend adding "that cannot be mitigated or minimized" to the end of the standard.

GD-09 "Recreational opportunities and developments should be designed to meet the Primitive or Semi-primitive Nonmotorized recreation opportunity class." This guideline should be clarified with the addition of 'in these ROS class areas'. As presently stated, it appears that these more restrictive requirements for recreation opportunities and developments would be applied to all ROS class areas including Roaded Natural and Semi-primitive motorized areas. This would be inconsistent with the management guidelines for these other ROS class areas and should not be applied.

p. 130 Glossary - Goal

It appears that a better definition for the public's understanding of a goal is that stated in FSH 1909 .12, Chapter 20, 22.16, particularly the statement "Goals are broad statements of intent, other than desired conditions, usually related to process or interaction with the public." This statement from the FSH fits the manner in which Goals are used in the Draft Plan. Also, the statement in the Glossary that "Goal statements form the principal basis from which objectives are developed." doesn't seem to fit as it would make more sense that Desired Conditions would be the basis from which objectives are developed. Likewise the reference to 36 CFR 291.3 doesn't appear to be relevant to the definition.