

Data Submitted (UTC 11): 10/20/2021 11:00:00 AM

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Comments: Grand County Commission Scoping Comments for Revision of Manti-La Sal National Forest Land Management Plan Submitted via certified mail and electronically at [mlnfpplanrevision@usda.gov](mailto:mlnfpplanrevision@usda.gov)

We appreciate the opportunity to continue to provide input from Grand County into revision of the Manti-La Sal National Forest Land Management Plan (LMP). We provide comments that are both specific to Grand County and, in the case of climate adaptation, applicable throughout the Forest. We look forward to continuing engagement with the revision process through the final Environmental Impact Statement and Record of Decision.

#### Moab Geographic Area

We support the Forest's acknowledgment that Moab and Castle Valley are dependent on the La

Sal Mountains for recharge of their sole-source aquifers and municipal water, and we support the proposed measures for the Forest's Moab Geographic Area. We urge that drilling for oil and gas be prohibited within the Moab Geographic Area. Because the knowledge of and use of all water is critically important to the county, we support the mapping of all springs, aquifers, and surface water throughout the Moab Ranger District, and the protection of all springs from human or ungulate trampling.

#### Climate Adaptation

We support the continuous development of Forest strategies to reduce greenhouse gases and increase carbon storage. Given that the La Sal Mountains are subject to myriad commercial and public uses, we urge the development of use-specific drought mitigation strategies and triggers for response to extreme and exceptional drought.

#### A Range of Alternatives

We are aware that a Manti-La Sal LMP Conservation Alternative has been developed that emphasizes Forest management changes in response to climate change, conservation of water, and health of the native ecosystems and species in our county and elsewhere on the Forest. We support comparison of the Conservation Alternative with other alternatives in the Draft EIS that the Forest indicates will be published in summer 2022. This comparison will inform both the Grand County Commission and county residents of the potential environmental and social impacts of reasonable options for management of Forest projects and uses. Wilderness Evaluation

We support the Forest's proposal to carry forward the following areas on the Moab Ranger District to the analysis stage of the Wilderness Evaluation process: Southern La Sais; Central La Sais, East; Roe Creek; Mill Creek Canyon, North WSA; North La Sal Peaks; and Beaver Creek. Though not all of these units fall entirely within the boundaries of Grand County, our southern county boundary line is a straight line, not based on watershed or geography. Moab's watershed extends south into San Juan County, and our watershed does as well. Given that the La Sal Mountains are part of our iconic scenery that many Grand County residents value highly and given the fundamental importance of Moab and Castle Valley's watersheds to our community, we support and endorse not only carrying these areas forward in the evaluation process, but we also support a wilderness recommendation for these areas. Beyond these areas that have emerged from the planning process thus far, we encourage the Forest to take a second look at areas also important to the preservation of our watershed and to county residents. Mary Jane Canyon, other additions to Mill Creek, Porcupine Rim, and Pinhook are all areas directly contiguous to larger roadless BLM lands; each of these areas deserves more careful consideration in your

evaluation process. In addition, large, bulbous exclusions from the Beaver Creek unit deserve to be included in the analysis phase. If impacts that caused these exclusions are either ephemeral or substantially unnoticeable to the average lay visitor, these areas merit additional consideration and analysis.

#### Inventoried Roadless Areas

Inventoried Roadless Areas (IRAs) deserve special care and attention in the planning process as well. Codified in the 2001 Roadless Area Conservation Rule, IRAs provide numerous benefits, including excellent habitat, clean water, recreation, and other values important to the county and county residents. All alternatives that are developed in the DIES stage must fully and completely uphold the provisions found within the 2001 Roadless Area Conservation Rule, and commercial timber harvest and new road construction must be prohibited in these areas.

#### Recreation and Access

We are fortunate that the Forest is cognizant of the diversity and intensity of recreational use of the Moab Ranger District. We support the recreation and access provisions proposed by the Forest, and urge consideration in the Draft EIS of additional elements proposed in the Conservation Alternative

#### La Sal Alpine Area

The alpine region of the La Sal Mountains is a rare habitat, highly valued by recreationists, and under threat from the drought and heat associated with climate change. We urge the Forest to use its authority and responsibility for maintaining Forest habitats to effectuate the removal of the non-native Mountain Goat as an unnecessary added stressor on a habitat type that is shrinking due to climate change.