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Comments: Comment letter attached.

February 25, 2021

Manti-La Sal National Forest

Attn: Plan Revision Team

599 West Price River Dr.

Price, UT 84501

Submitted via: CARA public comment portal

Re: Manti-La Sal Draft Revised Forest Plan

REVIEW ENTIRE LETTER

Dear Plan Revision Team,

Thank you for considering the following feedback from Outdoor Alliance regarding the Manti-La Sal Forest Draft Revised Forest Plan (#50121). These comments are submitted on behalf of Outdoor Alliance in partnership with local and regional advocacy organizations that include Friends of Indian Creek, Public Land Solutions, and Salt Lake Climbers Alliance. We recognize and genuinely appreciate the effort that the Manti-La Sal Planning Team has dedicated to the Manti-La Sal Draft Revised Forest Plan and are grateful for the opportunity to provide feedback.

Outdoor Alliance is a coalition of ten member-based organizations representing the human powered outdoor recreation community. The coalition includes Access Fund, American Canoe Association, American Whitewater, International Mountain Bicycling Association, Winter Wildlands Alliance, The Mountaineers, the American Alpine Club, the Mazamas, Colorado Mountain Club, and Surfrider Foundation and represents the interests of the millions of Americans who climb, paddle, mountain bike, backcountry ski and snowshoe, and enjoy coastal recreation on our nation's public lands, waters, and snowscapes.

A Shared Vision for the Manti-La Sal National Forest

The Manti-La Sal National Forest (herein Forest) covers more than 1.2 million acres of public land in the central and southeastern parts of Utah and a small portion in western Colorado, and is known for its diverse landscape of deep sandstone canyons and large mountain ranges. From the Abajo and La Sal mountains in southeastern Utah to the Wasatch Plateau and Sanpitch mountains hundreds of miles away in central Utah, the Forest offers some of the best rock climbing, mountain biking, backcountry skiing, trail running, backpacking, whitewater rafting and paddling in the intermountain west, all within driving distance to large metropolitan areas in Utah and Colorado.

To help the Forest Service reach consensus during the Manti La-Sal Forest Plan Revision process, Outdoor Alliance provides support for grasstops leaders to pursue consensus positions with other stakeholders, and

through this process, create a shared vision for the Forest amongst wide ranging interests. Although we are a human powered recreation advocacy organization, our approach is to view the Forest holistically, with careful considerations for Tribal lands, wildlife habitat, sensitive landscapes, water resources, and many of the other forest plan components where recreation intersects with other uses or resources. Our working group is composed of local, regional, and national groups that include the Access Fund, American Whitewater, Friends of Indian Creek, International Mountain Bicycling Association, Public Land Solutions, Salt Lake Climbers Alliance, and Winter Wildlands Alliance. We have begun a dialogue with the Manti-La Sal planning team, conservation groups, wildlife groups, and Utah Din[eacute] Bik[eacute]yah as the first step toward developing a shared vision for the Manti-La Sal National Forest. We envision a revised forest plan that provides thoughtful management for the future of our public lands by supporting sustainable recreation opportunities, while preserving the health and integrity of the surrounding cultural and natural resources. The following comments provide high level feedback on the Manti-La Sal Draft Revised Forest Plan, and are organized by sections in the table below.

Comment Sections

I. Tribal Consultation 3

II. Forest-wide Direction 4

III. Recreation and Access 4

i. Recreation Opportunity Spectrum (ROS) 5

ii. Backcountry Skiing/Snow Sports 6

iii. Camping 7

iv. E-Bikes 7

v. Motorized Recreation 7

vi. Mountain Biking and Trail-Based Recreation 8

vii. Rock Climbing 8

1. Maple Canyon Climbing 9

2. Joe's Valley 9

viii. Trailhead Experience 9

ix. River Recreation 10

IV. Management Areas 10

i. Recommended Wilderness Area 10

V. Recommended Eligible Wild and Scenic Rivers 11

VI. Scenery Management 11

VII. Watershed and Aquatic Resources 12

i. Community Water Sources 12

VIII. Monitoring 12

I. Tribal Consultation

It is important that this planning process proactively engage in effective and meaningful Tribal consultation in order to understand the overlap between traditional values, sacred sites, current and historical Native practices, and other public uses on the Manti-La Sal National Forest and adjacent areas. This work should involve all interested Tribal government officials and stakeholders, consider geographic locations where overlaps exist between Native American sacred sites or traditional resources (e.g. hunting, medicine collection, wood gathering, ceremonial sites, etc.) and other activities, and identify management strategies that respect the current needs and history of Native American communities.

In striving to create the most effective, harmonious, and sustainable management plan possible, Outdoor Alliance will work alongside local Indigenous Tribes who possess centuries of experience maintaining natural resources and moving across the land. Numerous archaeological sites and oral accounts provide ample evidence for the connection between traditional uses of the land and recreation. Whether climbing technical rock faces to access home sites and granaries in the southwest, running trails to deliver messages in the Andes, seasonally migrating between desert lowlands and alpine environments to herd livestock and find temperate weather in the Sierra Nevada and the Rockies, or constructing shelters and hunting blinds just below the summits of some of the nation's most prominent mountains, Indigenous people have been running trails, climbing rock, hunting and fishing, and summiting peaks long before the modern concept of outdoor recreation - and continue to do so today.

Outdoor Alliance is committed to fostering the natural allyship between Indigenous Tribes and outdoor recreation in order to realize our shared aspirations. To accomplish this, Outdoor Alliance, in partnership with Access Fund has created the Native Lands Coordinator position to serve as a catalyst for meaningful relationship building with Tribes and to ensure we are listening to the voices of Indigenous peoples. As the original stewards, residents, and recreationists of the land, Tribes have approached its up-keep in a manner that understands both ecological processes and sacred values. Outdoor Alliance believes that these practices must be respected and prioritized in our modern era so that future generations of user groups continue to share the deep connection to the land we all so value.

II. Forest-wide Direction

Outdoor Alliance and partner organizations value fish and wildlife habitats, clean water, clean air, and diverse forests. We recognize that a positive recreation experience is dependent upon the quality of the surrounding natural resources, which provide for scenic viewsheds, environmental health, wildlife encounters, the feeling of solitude, and a natural experience. Population growth, technological advances, climate change, and many other variables will affect the Manti-La Sal in future years. We recommend that the Forest Service prioritize the long-term ecological health of public lands, wildlife, and watersheds, as well as the increased need for opportunities to sustainably enjoy the forests. We support forest plan components and decision-making processes that focus on long-term solutions, preserve access to public lands, and protect natural environments and wildlife habitat in order to leave a legacy for future generations. This should also take into consideration the ongoing and accelerating effects of climate change.

III. Recreation and Access

The Manti-La Sal National Forest contains incredible and diverse recreation opportunities, including more than 880 miles of trails, 160 rock climbing sites, 27 miles of whitewater paddling, and 170,000 acres that are explored for backcountry skiing. In April of 2019, Outdoor Alliance shared a geospatial database of our recreation assets with Megan Eno, acting Forest Plan Revision Team Lead. To complement and support our comments here, we will be sending the Planning Team an updated geospatial database of recreation resources within the Manti-La Sal National Forest. In sharing this data, our intent is to improve collaboration that results in sustainable recreation outcomes that are compatible with other multiple uses, protects cultural and natural resources, and garners support, advocacy, and shared stewardship by the public. In addition, our recreation data can be explored through an interactive online web map.1

Based on the wide spectrum of recreation activities that occur on the Manti-La Sal National Forest and the demand for outdoor recreation opportunities, we believe recreation management is needed to ensure the quality of diverse recreation opportunities and to protect the integrity of cultural and natural resources. The following section details forest-wide policy and management recommendations that may assist the Manti-La Sal National Forest in successfully and sustainably managing recreation. We support the Forest Service's goal to develop and maintain volunteer programs and partnerships that engage the public in stewardship of natural and cultural resources.

To assist implementing this goal, the Forest Service should complete a strategic partner assessment across the Manti-La Sal National Forest to determine the scope and scale of partnered efforts, gaps in support and leverage, needs, and issues related to Forest Service capacity.

This assessment could help create a "Recreation Users Council" (RUC) that includes representatives from various user groups and stewardship groups (including local community representatives) to monitor, mitigate, and resolve potential conflicts. We support preserving the wild and natural character on the forest while maintaining diverse recreational opportunities for solitude, primitive and human powered forms of recreation. High use recreation areas and areas of special recreational significance should be recognized and sustainably managed in a way that protects their unique settings and the place-based activities they support.

i. Recreation Opportunity Spectrum (ROS)

The Recreation Opportunity Spectrum (ROS) is a system for classifying and managing existing and desired recreation opportunities. The ROS framework integrates individual recreation setting characteristics (including access and scenic character) to function collectively in providing distinct recreation opportunities. Because setting characteristics may change by season, the resulting ROS class may also change by season. As a result, we recommend that the Forest Service develop ROS classes for both summer and winter (see backcountry skiing/snow sports).

At the forest scale, sustainable recreation is derived through an integrated planning process and emerges as the resultant set of desired ROS spectrum classes. The desired set of ROS classes is achieved by integrating other cultural and natural resource values, and by engaging and garnering the support, advocacy, and shared stewardship of the public. To help inform Manti-La Sal's niche or distinctive roles and contributions, we recommend the ability to assess, compare, and contrast the draft revised forest plan's ROS classes with those in the broader landscape. To do this, the Forest Service should develop ROS classes that extend beyond the boundary of the forest. At a minimum, all lands within the Manti-La Sal administrative boundary should be mapped (including non-forest service lands).

While ROS and other zoning frameworks lump various attributes and then categorize them into distinct settings that serve to sub-divide an area into management-focused polygons, place-based planning identifies values and attachment to a specific location within a landscape that are unique and specific to the place. By understanding the meanings that places have for individuals and groups, management direction and activities can be designed

to preserve or enhance those characteristics that make a specific place valued (e.g. rock climbing in Joe's Valley). The Forest Service should gather input from the public and inventory important place-specific recreation uses (e.g. Outdoor Alliance's GIS data) to refine management direction and address specific features, opportunities, and values that are not addressed in broader zoning frameworks.

ii. Backcountry Skiing/Snow Sports

While we recognize that the forest will not make site-specific decisions during the forest plan revision process, we do recommend a comprehensive review of current and future winter recreation uses, suitability of over snow vehicle (OSV) use, and application of a Winter Recreation Opportunity Spectrum (ROS) in order for the revised forest plan to provide a solid foundation for future over-snow travel planning efforts. For example, establishing winter ROS settings for the Manti-La Sal will help build a framework for winter travel planning, required by the 2015 Over-Snow Vehicle (OSV) Rule (36 C.F.R. part 212), by identifying which areas of the forest are suitable, or not, for OSV designations. The winter ROS should be mapped so that non-motorized experiences can be easily enjoyed in both the front-country and backcountry.

In the revised forest plan, the Forest should also clearly identify seasons for off-highway vehicle and OSV use based on wildlife needs, water quality considerations, average snow depth figures, and other relevant information. Seasons are required in travel management planning, but can be addressed in forest plan revision as well. The Forest Plan should also specify that OSV travel within designated areas should only be allowed when consolidated snow depth at established, representative locations, measures at least 18 inches, regardless of the date. This dual approach of season dates and minimum snow depth will help the forest easily adapt OSV recreation management as the climate changes. The revised forest plan should also include an objective stating that winter travel management planning will be initiated within one year of completing the forest plan revision, with the goal of issuing an OSV Use Map within four years.

iii. Camping

We recommend that a comprehensive inventory of dispersed camping areas be completed to identify areas that need additional management including: designated dispersed camping with accessible restroom facilities, developed/fee-based campgrounds, barrier installations or vehicle controls to restrict access, and/or prohibition of dispersed camping in certain areas to protect resources. Dispersed camping should be properly signed and located. Signage and enforcement are key to ensuring user education and compliance with new camping regulations, and we recommend that the Forest Service work with user groups, as well as tourism and media outlets (e.g. chambers of commerce, social media), to communicate with visitors.

iv. E-Bikes

Because of recent changes in technology and the increased use of e-bikes, including e-mtbs, it is important that the Forest Service proactively consider how this technology will be managed. The revised forest plan should state that e-bikes should be permitted only on natural surface trails where those trails allow for motorized use. In some cases, it may be appropriate to re-categorize non-motorized trails to allow for Class 1 e-bike use (while continuing to exclude other classes of motorized uses, including Class 2 and 3 e-bikes). The revised Forest Plan should state that these decisions will exclusively be made through the travel management process, including full application of NEPA and robust public engagement, and that e-bikes will not be permitted in areas with ROS settings of Primitive or Semi-Primitive Non-Motorized.

v. Motorized Recreation

The Manti-La Sal National Forest provides extensive opportunities for motorized recreation. The revised forest plan should consider existing uses, as well as new, emerging motorized recreation uses that may bring new

impacts to the forest. Increased efforts should be considered to enforce rules that limit motorized uses in specific areas and to enforce speed limits on forest roads; limits that are regularly exceeded impact the experience of all forest users. As with all recreational activities, resource damage from motorized recreation should be monitored and adaptive management actions taken to limit such impacts. The revised forest plan should assess all existing trail stream crossings within the planning area within five years of plan approval to assess stream sediment impacts and reroute roads and trails as needed. All designated routes and areas for motor vehicle use made through travel management planning should be located to minimize resource impacts and conflicts with other recreational uses, in compliance with 36 C.F.R. [sect] 212.55(b), "Specific criteria for designation of trails and areas." The Draft Environmental Impact Statement and Draft Forest Plan should clearly state that ROS settings do not preclude travel planning decisions. The final plans should explain that site-specific travel planning is needed to determine where motorized vehicle use will be allowed (including over-snow) within semi-primitive, roaded natural, and rural areas.

vi. Mountain Biking and Trail-Based Recreation

The Manti-La Sal offers extensive trail opportunities for mountain biking, hiking, trail running, and equestrian use. This plan should maintain opportunities for diverse non-motorized trail experiences, including use specific trails and new trail opportunities. Mountain biking is a very popular activity on the Manti-La Sal National Forest that should be managed sustainably to protect the resource and enhance the user experience. The plan should consider management actions that separate non-motorized biking activities from motorized recreation where appropriate and consider planning actions that authorize new non-motorized mountain biking trails, as well as other use specific non-motorized trails. We encourage the Forest Service to work with the local mountain bike community to develop an appropriate planning and management framework.

vii. Rock Climbing

Rock climbing is an important recreation activity on the Manti-La Sal National Forest, and is an appropriate and sustainable form of recreation on National Forest lands. Approximately 37 percent of America's climbing resources (about 10,000 climbing sites) are managed by the Forest Service. The Manti-La Sal affords exceptional and diverse climbing opportunities, including Mill Creek, Joe's Valley, and Maple Canyon. We recommend that the revised forest plan include provisions that recognize rock climbing as a legitimate Wilderness and non-Wilderness activity and supports the use of fixed climbing anchors as appropriate. In order to achieve this goal, the Forest Service should develop strategies for human waste management, resource protection, and erosion control and collaborate with local climbing organizations on education and stewardship initiatives.

1. Maple Canyon Climbing

Maple Canyon provides world class sport climbing opportunities and is also breeding territory for golden eagles. Climbing areas across the United States share habitat with nesting raptors including golden eagles. Seasonal monitoring is suggested to locate exact nest locations each season. We encourage ongoing partnerships with Hawk Watch International, Salt Lake Climbers Alliance, and Access Fund to assist in monitoring and public outreach to promote avoidance areas. The climbing community has a proven track record of respecting seasonal avoidance areas as well as assisting in collection of monitoring data. We support ongoing stewardship of the area being shared with the climbing community to facilitate maintenance of fixed anchors and climbing access trails. Access Fund and Salt Lake Climbers Alliance have the resources and knowledge to assist and lead efforts in these areas of need. We encourage the Forest Service to include language in the plan that explicitly allows for the use and maintenance of fixed anchors as appropriate in Maple Canyon.

2. Joe's Valley

Joe's Valley is a world class destination for bouldering. The area has been through an extensive planning process with the Forest Service, including an Environmental Assessment (EA) in 20172 to aid in management of the area as a recreational resource. In addition, the Salt Lake Climbers Alliance compiled a detailed assessment of existing climbing resources and access paths including images and maps. This assessment was submitted to the Manti-La Sal National Forest in 2015. We can provide this data again if needed. This previous planning process included in-depth partnerships and feedback from Salt Lake Climbers Alliance, Access Fund, and the local climbing community. We encourage that the findings and management decisions of this EA be incorporated, as appropriate, into this Forest Plan.

viii. Trailhead Experience

The quality of a user's outdoor experience, especially on shared terrain and on popular trails within a few-mile radius of multi-use trailheads, can be adversely affected by other users in high-density settings. For safety reasons, and to reduce conflicts between user groups, the Forest Service should consider providing separate trails or varied closure periods for different user groups in high-use recreation areas. The trailhead proximity issue could be exacerbated in the winter, when access to summer trailheads is not feasible. Additionally, high density trailheads may also require more developed infrastructure including toilets, designated or developed campsites, parking improvements, and vehicle controls to minimize impacts to natural resources. Within five years of plan approval, the Forest Service should complete an inventory of all non-system trails (including social trails) and have the option of; utilizing erosion control/mitigation activities to sustainably manage non-system access trails where appropriate, adding non-system trails (to the system), or obliterating/naturalizing non-system trails that are not sustainable.

ix. River Recreation

Canoeing, kayaking, and rafting are likely some of the oldest forms of travel and exploration. Even though technological advances have improved safety, the core elements of the activity remain - exploring natural areas by paddling a small boat through the landscape on rivers. Each river is a "natural trail" through the landscape, reflecting the character of the geology and natural beauty. Paddling is human-powered, place-based, low-impact, quiet, non-consumptive, skill-based, and wilderness-compliant; it is exactly the kind of activity and experience covered under the definition of "sustainable recreation" in the new Forest Planning Rule.3 As such, paddling opportunities in the Manti La Sal National Forests should be recognized, and management measures should protect these recreation opportunities now and for future generations.

IV. Management Areas

i. Recommended Wilderness Area

A Recommended Wilderness Area (RWA) is a designation that protects undeveloped land with wilderness characteristics, and it also supports many human-powered recreation opportunities. However, some wild backcountry areas contain high-value mountain biking trails or recreation infrastructure, such as bolted climbing areas, that may conflict with a wilderness recommendation. We are working with the Grand Canyon Trust, Pew Charitable Trusts, and other conservation organizations to assess RWAs for potential recreation conflicts. Access Fund and Salt Lake Climbers Alliance have provided detailed rock climbing site location information to the Forest Service during the 2017 Wilderness

Inventory and Evaluation process. Our goal is to identify and resolve any potential conflicts, so that we can support RWA designations in the revised forest plan.

The Forest Service should work with recreationists to identify potential conflicts between non-conforming recreation uses and RWA designations early in the forest plan revision process to avoid creating or escalating

conflicts. Existing bolt intensive climbing areas such as Mill Creek and Maple Canyon may not be compatible with an RWA designation. RWA boundaries should be drawn in a manner that minimizes effects to established recreation infrastructure or uses. To properly assess RWAs for recreation infrastructure, the Forest Service should publish an updated Infra System Trails dataset that includes the "Allowed Terra Use" and "Allowed Snow Use" attributes.

V. Recommended Eligible Wild and Scenic Rivers

We appreciate the work that the Forest Service has done thus far on the Wild and Scenic River eligibility evaluation. However, the inclusion of a single eligible Wild and Scenic stream segment, totaling 1.2 miles, is disappointing. The Manti-La Sal Wild and Scenic River Report ignores numerous rivers that are both free-flowing and possess at least one Outstandingly Remarkable Value (ORV). The eligibility phase of the Wild and Scenic Rivers Act is designed to be broad, with only two qualifications. We ask that the Forest Service complete a more robust Wild and Scenic eligibility review and consider every river segment that is both free-flowing and has at least one ORV; there are many streams within the Manti-La Sal National Forest that meet these qualifications.

We support the identification of Duck Fork Creek as eligible for Wild and Scenic River designation. However, numerous stream segments that qualify for eligibility have been overlooked. American Whitewater has provided detailed segment-specific eligibility recommendations to inform the Wild and Scenic River Report and the Draft Revised Forest Plan for the Manti-La Sal National Forest in a separate comment letter. We encourage the Forest Service to review these recommendations.

VI. Scenery Management

The Scenery Management System (SMS) provides a systematic approach to inventory, assess, define, and monitor both existing and desired scenic resource conditions on national forest system lands. Specific components of the SMS include: scenic character, the degree of scenic diversity (scenic attractiveness), how and where people view the scenery (distance zones), the importance of scenery to those viewing it (concern levels), and the desired degree of intactness (scenic integrity objectives).

The Forest Service should consider how the existing condition of the scenery (existing scenic integrity) interfaces with the unit's newly mapped existing ROS classes. Since an important characteristic of ROS classes is the scenery, it is important that the existing condition of the scenery is consistent with the types of recreation opportunities and experiences of each setting.

VII. Watershed and Aquatic Resources

i. Community Water Sources

Water quality and quantity is a significant point of interest for both Grand County and the City of Moab, and recreational opportunities are also reliant on adequate water quality and quantity. Negative impacts to water may result from unmanaged recreation, vegetation treatments, timber harvesting, and hard rock mining. Source Water Protection Zones that provide drinking water must be properly delineated and activities in these zones should be managed to avoid potential contamination of ground and surface water.

Of particular significance on the Manti-La Sal National Forest are the impacts to water from livestock grazing. In several locations throughout the Manti-La Sal National Forest it is apparent that the management of livestock is inadequate, impairing the resource, and negatively impacting the recreation experience. For example, exclusion areas near Warner Lake in the La Sal Mountains (Wet and Dry Fork) are not being enforced, and throughout the La Sal Mountains nearly every single water source is fouled by cattle manure and trampling, significantly impacting the water quality of springs, streams, ponds, and lakes. The revised forest plan should implement

better livestock management protocols to protect and enhance rangeland resources, not just for cattle operations, but also for recreational users. We also recognize that recreationists may have adverse impacts on grazing, including frightening livestock or leaving gates open. Potential conflicts between grazing and recreation should be identified and mitigated through planning and/or education of users. The Forest Service should assess the overlap between grazing allotments and recreational infrastructure (e.g. trails, campgrounds, dispersed camping areas) to identify potential conflicts, and implement mitigation strategies that help manage these conflicts where possible.

VIII. Monitoring

The 2012 Planning Rule identifies eight specific monitoring requirements. Of those eight, three are either directly related to sustainable recreation or can incorporate sustainable recreation questions and indicators. Each plan monitoring program must contain one or more monitoring questions and associated indicators addressing each of the following:

1. The status of visitor use, visitor satisfaction and progress toward meeting recreation objectives.

2. Measurable changes on the plan area related to climate change and other stressors that may be affecting the plan area.

3. Progress toward meeting the desired conditions and objectives in the plan, including for providing multiple use opportunities.

Since desired conditions for sustainable recreation must include mapped desired ROS settings, one of the most useful indicators in measuring and monitoring sustainable recreation is the condition and trend of the unit's ROS settings. By comparing existing ROS settings with desired ROS settings, achievement or movement toward sustainable recreation can be accomplished.

Recreation objectives must also be monitored. These objectives are designed in the plan development phase to maintain or enhance the unit's distinctive roles and contributions, move existing conditions to desired conditions, and/or address specific issues, concerns, and/or opportunities identified through public engagement and integration with other resources. Tools and systems to measure desired conditions and objectives include the Scenery Management System to measure the integrity and stability of the desired scenic character, Special Uses Data to monitor compatibility of visitor services delivered through recreation special uses, and Infra to monitor the condition and trend of recreation facilities and access.

Caution should be used when using National Visitor Use Monitoring data to assess visitor use and visitor satisfaction across the forest. The limited survey periods conducted by the NVUM program do not adequately capture visitor use regarding seasonality, types of uses, new emerging uses, and volume. Moreover, some recreational activities (e.g., rock climbing) do not have protocols for data collection within the NVUM system. We encourage the Forest Service to expand upon its NVUM protocols and partner with universities, local stewardship groups, and other institutions that can assist with monitoring through formal programs and/or volunteer efforts.

* * *

Outdoor Alliance and our partners are invested in the Manti-La Sal Forest Plan Revision process and we are available as a resource to the Manti-La Sal Planning Team. We look forward to continuing our work on the Manti-La Sal National Forest, engaging with Indigenous Tribes, and collaborating with other forest stakeholders. Please do not hesitate to contact us with any questions.

1 https://bit.ly/Manti-LaSal

2 Joe's Valley Bouldering Area, Environmental Assessment. 2017
https://www.fs.usda.gov/nfs/11558/www/nepa/101516_FSPLT3_4032859.pdf

3 FSH 1909.12, zero code, section 05