Data Submitted (UTC 11): 5/5/2021 10:34:02 PM

First name: Richard Last name: Spotts Organization:

Title:

Comments: March 1, 2021

Dear Forest Service officials:

Please include the "Manti-La Sal Conservation Alternative" in your forthcoming draft forest plan Draft Environmental Impact Statement (DEIS) as one of the stand-alone alternatives carried forward for detailed analysis.

This "Manti-La Sal Conservation Alternative" is described at this website:

https://www.mantilasalconservationalternative.org/

I have reviewed this website information. I strongly believe that this "Manti-La Sal Conservation Alternative" is reasonable, comprehensive, scientifically sound, and feasible to implement. It was developed by a broad coalition of environmental groups and their experts, including the Grand Canyon Trust, Western Watersheds Project, Defenders of Wildlife, Southern Utah Wilderness Alliance, and WildEarth Guardians.

As you know, under the National Environmental Policy Act (NEPA) and implementing Council on Environmental Quality (CEQ) regulations, the alternatives analysis is the "heart" of any DEIS. It is where the environmental consequences, positive or negative, of each alternative can be objectively compared and evaluated with the other alternatives to help the public understand the choices and to help the agency ultimately reach an informed and proper decision. The existing 1986 forest plan is clearly out of date. Since then, there has been significant new and relevant scientific studies on emerging and increasing threats to forest resources, such as prolonged drought and extended fire seasons from climate change, expanding cheatgrass and other invasive species, serious habitat fragmentation, destruction of biological soil crusts by livestock grazing, and greater popularity of OHV recreation.

The Biden administration has properly committed to taking aggressive positive actions to respond to the mounting climate and extinction crises. As one example, President Biden endorsed the campaign to protect 30 percent of our nation's lands and waters by 2030. This is commendable, although what the threshold will be for determining that an area is "protected" has not yet been resolved. In any case, Forest Service lands can and should play a key role in helping to achieve these goals.

I am concerned that the Forest Service's draft plan has already been released to some government officials and stakeholders. Although this caused some confusion, it is now "water under the bridge." Since the Forest Service has apparently not finalized the Notice of Intent (NOI) to initiate the formal comment period to begin the plan revision NEPA process, I request and recommend that, when that NOI is submitted for publication in the Federal Register, that it include an overt statement that the "Manti-La Sal Conservation Alternative" has been accepted and a commitment that it will be fully analyzed as a stand-alone alternative in the DEIS. This will inform the public and allow them to compare the Forest Service draft plan on its website and the "Manti-La Sal Conservation Alternative" on its website. This advance notice of at least two of the DEIS action alternatives (not counting the obligatory "no action" or "current management" alternative) will also remove the need for the public to advocate for inclusion of the "Manti-La Sal Conservation Alternative" in the DEIS.

I am counting on the Biden administration to keep its promises for meaningful change and to not continue

"business as usual." Many resource trends are in a downward trajectory and not sustainable over the long term. Bold reforms are necessary to stop and then reverse these trends. Restoring land health and climate change resilience should be the top management priorities.

As a long-time Utah resident, I know how important the Manti-La Sal National Forest lands and resources are in terms of their potential to help achieve the Biden administration's environmental goals. Please turn this great potential into reality.

Thank you very much for your consideration.

Sincerely,

Richard Spotts

255 North 2790 East Saint George Utah 84790 raspotts2@gmail.com

cc: Interested parties