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Comments: I am a Moab resident with a background in botany and education. I have been hiking, camping, and observing nature in the Manti-La Sal Forest for many years. I have volunteered countless hours doing environmental advocacy work and research, particularly in the area of grazing reform. I have participated in the photographing and documentation of the declining conditions of our forests, and have attended numerous Forest Service meetings regarding these concerns. It is essential that the Forest Service analyze the Conservation Alternative in its full and complete form in the draft environmental impact statement. According to NEPA, a reasonable range of alternatives need to be considered as long as they are significantly different and have significantly different consequences. After reviewing the differences between the Forest plan and the Conservation Alternative, it is clear that the Conservation Alternative is reasonable, significantly different, and the consequences, especially in light of climate change, are profound.
Grazing management reform
Grazing is the most widespread "land use" on the Forest. Although the FS has a mission of "multiple use," in many areas, the presence of cow feces, offensive odors and decimation of native plants renders many recreational areas unusable for hiking, camping, and observing nature. Allowing anything above 30% utilization (and 25% during a drought), creates systematic degradation of the habitat. Even the tools for measuring utilization are problematic and often subjective. I have seen many instances where an area that is clearly not meeting standards is considered acceptable. Springs are being polluted and native plants that wildlife species depend upon are being eradicated. Plants not considered forage for livestock are not even considered in annual operating instructions as they are not "key forage species." A 50% utilization rate or more, as recommended by the FS, and the lack of prohibition of seeding and maintenance of non-native "forage," will eliminate many species over time that play essential roles in our ecosystem.

Native Plant Materials
There needs to be a standard for using only native plant materials in seed mixes used on the forest. These seedings, as well as naturally generated seedlings need to be protected from the effects of trampling, browsing, grazing and girdling by livestock and wildlife until they are established. Established stands of introduced, rhizomatous perennial grasses such as Bromus inermis, Poa pratensis and Thinopyrum intermedium, as well as vigorous bunch grasses such as Agropyrum cristatum and Dactylus glomeratus, should no longer be maintained as they result in the suppression and eradication of native plants and their associated wildlife.

Pollinators
Permits for Honeybee apiaries should neither be granted nor renewed on National Forest land. Honeybees displace native pollinators which can result in the elimination of native plants that depend on the native pollinators. A species list of native pollinators known to be present of the Manti-La Sal Forest needs to be generated and published. Without this information there can be no way to quantify the damage that is being done to the ecosystem by the introduction of potentially millions of non-native bees that outcompete the native species and spread diseases.

The Western Bumble Bee, has been netted and documented on the La Sal Mountains by entomologist Tim Graham. This bee, which requires a series of flowers for gathering pollen throughout the season, needs to be designated as a species of Conservation Concern, in order to provide for and protect its habitat.

Protect At-Risk Plants
Over the years I have been observing and monitoring several endangered plants that are slowly disappearing in the Moab area. At-risk plants need to be better understood and protected. The Forest Service must research and monitor these species with academic and non-profit partners.

The Heliotrope Milkvetch is the only listed threatened plant on the Forest, and yet there is no conservation management plan as required by the Fish and Wildlife Service when it was listed. A plan needs to be created to protect this plant and the other species of conservation concern that grow in the same alpine habitat of the Wasatch Plateau. Establishing the Heliotrope Botanical Area is necessary to protecting this plant.

In order to protect the rare plants of the Mount Peale Research Natural Area (RNA) the non-native mountain goats should be removed. The goats threaten the endemic La Sal daisy, the endemic La Sal mountain ragwort, Baker's alpine parsley and other rare alpine plants this RNA was established to protect in this small, alpine ecosystem in Southern Utah.

Proposed Special Designations
One of my favorite spots in the mountains is Andy Mesa, located in the north foothills of the La Sals. It is composed of 500-year old trees with a robust and diverse native plant understory. It has stunning views of bedrock and peaks and significant biocrust. It is a valuable representation of a healthy ponderosa forest and could provide opportunities for environmental education by creating a signed nature trail about the healthy native plant community. This area, known as the Andy Mesa Red Towers Botanical Area, should be established in order to protect and appropriately manage it. ?
A Heliotrope Botanical Area needs to be established in the Wasatch Plateau to protect the Heliotrope Milkvetch, the only listed threatened plant on the forest. Although it was required by the Fish and Wildlife Service when it was listed, it does not have a management plan to protect it.

The Sinbad Ridge RNA should be recommended in the Forest Plan. This area on the east side of the La Sal Mountains has healthy mature ponderosa, aspen and shrubland communities that have had minimal human disturbance due to its remote setting.

Thank you for your consideration.