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Comments: To whom it may concern,

I am writing today to submit a scoping comment regarding the revision of the Manti La Sal Forest Management Plan. We are amid a climate catastrophe, one that's consequences and effects are only going to worsen over the coming years. I believe that in this age of climatological shifts it is deeply important that forest management shifts in the direction of preserving ecosystem functions and mitigating the extreme effects that human use has on our forest systems. Perhaps the largest of these effects is that of livestock grazing and the lack of sustainable management practices. The current proposed forest plan states as a guideline that "utilization of key forage species should be no greater than 50 percent of current year's growth" (Pg.80). A 50 percent utilization of growth clearly falls into the category of heavy grazing, a standard defined in a widely respected paper on rangeland management as "a degree of herbage utilization that does not permit desirable forage species to maintain themselves" (Holechek, et al.). In order to ensure palatable species are able to maximize their herbage producing ability, the livestock utilization limit must be reduced to 30%. Additionally, this guideline must be revised into a standard to ensure proper adherence by permittees.

I am disheartened to see that the current proposed plan lacks any limitations on the creation of new livestock watering projects or the modification of existing projects. As drought conditions are expected to worsen across the American West the implementation of standards that ensure water is held and stored within is natural watersheds, rather than extracted, is more important than ever. The new forest management plan needs to include a standard that "No new drilling, new spring development, new water trough, or excavation of additional stock ponds will be permitted for livestock watering without an equal decrease by documented volume of water extraction elsewhere on the allotment at the time of the proposed development." (Conservation Alternative pg. 103). The availability of declining water abundance is increased when riparian areas are healthy and protected, while the current forest plan proposes as a standard that " New livestock corrals shall be located outside riparian management zones" (MLSF Draft Plan, pg 80), this standard also needs to include that all livestock water projects are also located outside of riparian management zones in order to ensure maximum protection or already degraded and fragile riparian areas.

As a collective, our communities must begin to shift away from old-standing traditions and cultural norms to adequately protect and preserve our public lands. While the state of Utah has a rich history of livestock production, it is vital that permittees can respond to changing conditions on their allotments, and prioritize the protection of ecosystems they use, without fear of retribution for not running their cattle at near-permit numbers or having their permit numbers reduced. The new management plan needs to include an objective that states: "Within 2 years of plan approval, develop processes by which permittees may apply for (a) reduced use for conservation and restoration purposes (while retaining existing permit numbers); and/or (b) voluntary closure of all or part of an allotment based on ecological values, location within wilderness, conflicts with other forest uses, and/or lack of sufficient production for economic sustainability" (Conservation Alternative pg. 102)

Lastly, at this forest is a public resource I believe that the new management plan will only be effective if the maximum number of voices are included in its creation. I ask that the Conservation Alternative plan be included in the final forest management plan, as it includes the voices of countless experts who truly have the best interest the Manti La Sal at the forefront of their minds.