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Comments: In the summer of 2021, I had the opportunity to volunteer for a Weeding With Purpose project for the Grand Canyon Trust in the Left Fork of Huntington Creek (LFHC) of the Manti La Sal National Forest.

I have spent time in the Moab and Canyonland areas of Utah in the past but never this area of the Manti La Sal. Driving from my home in Longmont, Colorado, the air-quality and visibility was the worst that I had ever seen given wildfire impacts all over the west. As I ascended the area west of Huntington I was greeted with cleaner air and a most remarkable forest vista. It felt like I had climbed out of Mordor into Rivendell.

During the days weeding we had the opportunity to speak to other scientist volunteers and even the Forest Service grazing manager for that area. One could see a clear difference in neighboring riparian and wetland areas that allowed motorized vehicles and grazing (including some four-wheelers that had collided and gone off trail). The LFHC reference area is in excellent condition given that it has been ungrazed for several years and that the Grand Canyon Trust has been removing invasive species for seven years. Given its condition, this non-motorized, livestock-free area is justification for establishing it as a Research Natural Area.

I am recommending the following be implemented into the revised Manti La Sal Forest plan:

Designate Left Fork Huntington Creek as a Research Natural Area

Designate Sinbad Ridge as a Research Natural Area

Designate Andy Mesa Towers as a Botanical Area

Designate Heliotrope as a Botanical Area

I am especially concerned about grazing impacts overall. Climate change plus the volume and types of animals who graze are having much more of an adverse impact than they may have back in 1986 when the last Manti La Sal Forest Plan was developed. For those areas that allow grazing, change the 60% utilization allowance to 30%. Science is showing that 30% utilization is not only better for the health of the land, but is also better for the economics of grazing.

Protect old-growth trees (over 150 years old) and allow younger forests to develop into old-growth stands in the future. I want the generations after me to be able to enjoy the majesty of centuries-old ponderosa, pinyon, and juniper trees.

The new forest plan should place the highest priority on preservation of cultural sites and expand the definition of cultural sites beyond the Western constructs of archaeology. The forest plan should include cultural resources as defined by Native Nations, including culturally significant plants, waters, gathering places, and more. For thousands of years, the entire area encompassed by the Manti La Sal Forest was home to multiple Native nations. These Tribes have thousands of years of locally relevant experience managing natural resources. I strongly encourage partnerships and true collaboration with Native nations to incorporate Indigenous traditional knowledge in the final plan.

While I appreciate that drafts of the revised Manti La Sal Forest Plan have tried to increase protections for Bears Ears National Monument, it should not be included in this plan update. Planning for a renewed Bears Ears National Monument belongs in a revised monument management plan and should be written in cooperation with the Bureau of Land Management and with shared governance from Native nations.

Fully adopt the final version of the Conservation Alternative:

<https://www.mantilasalconservationalternative.org/the-conservation-alternative-1>