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Comments: I am writing to recommend that the Conservation Alternative be fully compared to all Forest Service supplied alternatives in the Draft Environmental Impact Statement. It is an excellent, comprehensive alternative, replete with well thought out and concrete statements of Desired Condition, Objectives, and Guidelines. I request that the Forest Service consider all suggestions in the Conservation, incorporating many of the good ideas from it in their Forest Plan and fully justifying those that they decide to pass over.

I write as an ecologist, part of whose dissertation dealt with climate-change linked declines in alpine butterfly species in the Sierra Nevada mountains of California. I am very concerned that the Manti La Sal National Forest's (MLNF) current alternatives do not adequately address and plan for the foreseeable impacts that climate change will have over the Forest Plan's life. Those impacts need to be anticipated and addressed in nearly every aspect of Forest Service management, difficult though that may be.

To take one example, the Conservation Alternative (in Section 2.6.6: Alpine Communities) proposes a detailed concrete plan for protecting rare alpine vegetation and the species that depend on it. It includes Desired Conditions, Objectives, and Standards that realistically address and respond to the challenges that climate change plus increasing numbers of mountain goats pose to that vegetation. The MLNF's alternative does not.

Alpine vegetation, for reasons discussed by Diaz and Eischeid (2007), is especially vulnerable to climate change and is already disappearing throughout the western US. Even absent the recent introduction of mountain goats to the La Sals, alpine areas would be imperiled. Yet the Forest Service's plan contains no Standards for addressing the threat posed by the goats, and only one Objective (in Section 2.6.6), which is to, "Establish a minimum of twenty repeat photography study sites to monitor recreation and wildlife impacts on alpine soil and vegetation within five years of the plan approval". How does taking repeat photographs of the area, starting sometime in the next five plus years address the damage being done by goats plus climate change? The obvious answer is that it does not. Beyond waiting far too long to start assessing damage, and proposing a method that's samples far too little of the impacted area to adequately characterize those impacts, it prescribes no concrete action that will be taken even if/when damage is detected. We know enough about the impacts of climate change and mountain goats on alpine vegetation to plan accordingly right now, and should use that knowledge proactively. The Forest Service plan seems to pretend that we know nothing about that, and take a half-hearted stab at researching the issue, with no plan to act on what we then learn. It reads very much as being simply a delay tactic, and is thus much inferior - both less proactive and less science-based - than the Conservation Alternative's plan.

Thank you for considering my comment. I look forward to seeing how you incorporate the many excellent Goals, Desired Conditions, Objective, and Standards in the Conservation Alternatives in the MLNF's new Forest Plan.

References:

Diaz, H. F. and Eischeid, J. K. (2007). Disappearing "alpine tundra" K[ouml]ppen climatic type in the western United States. *Geophysical Research Letters*, 34: L18707, doi:10.1029/2007GL031253.