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Comments: These are my first, but not my last, comments on the Draft Revised Forest Plan of October 2020. They primarily concern the Monticello Ranger District, but may apply to all of the Ranger Districts.

In December of 1995, a new National Forest Landscape Management Manual was implemented by the Forest Service: "Landscape Aesthetics, A Handbook for Scenery Management" (Agriculture Handbook Number 701). That was 25 years ago, and I'm still waiting for the MantiLa Sal National Forest to implement it. On page 20 of the Handbook, under "Purpose and Scope" is the statement: "The goal of this handbook is to explain scenery management as an integrated part of ecosystem management for all levels of planning, including forest planning." Following this statement are the objectives of the handbook. The final result will be Scenic Integrity Objective maps. Based on the maps provided to the public to date, it does not appear that the Forest Planning Team has made any effort to follow the requirements of the Handbook.

Appendix 1 of the Manual, "Case Study," includes the steps necessary to arrive at Scenic Integrity Objective maps:

INVENTORY:

Determine Landscape Character

This map has not been provided to the public. Does it exist?

Analyze Existing Scenic Integrity

A mislabeled map shows this information. However, it is in conflict with the information on other maps. This will be discussed later in these comments. "Existing scenic integrity (ESI) is defined as the current state of the landscape, considering previous human alterations." (SMS p.1-2-Case Study)

Determine Inherent Scenic Attractiveness

No map has been provided with this information. Does one exist?

Determine Landscape Visibility

"The first step in mapping is to determine which travelways and use areas will be inventoried for landscape visibility." (SMS p.4-10) Why isn't there a map that includes the Primary road system, the Secondary road system, a list of the (41) hiking trails, the (23) ORV trails, the campgrounds, lakes, scenic viewpoints and other use areas on the

Monticello Ranger District? This map is supposed to be the starting point for mapping the distance zones that will have "Concern Levels" added. A "Seen Area" map results from placing the Concern Levels on the Landscape Visibility map.

I have been asking the Forest for an up-to-date Seen Area map ever since the existing Forest Plan was finalized in 1986: that's 34 years!!! Evidently this map still does not exist.

Determine Initial Scenic Class Assignments

This cannot be done without a Seen Area map with Concern Levels.

IMPLEMENTATION:

Consolidate Scenic Class Assignments

Assign Scenic Integrity Objectives to Management Areas

Produce Scenic Integrity Objective Maps

Obviously implementation cannot take place until the inventory is completed. However, p.67 of the Draft states: "Appendix A includes the scenic integrity objective maps." This statement is not correct. It would mean placing implementation before the inventory. The title of the map in Appendix A is: "Scenery Management Spectrum, South Zone, Monticello." This also is not correct. The legend on the map states: "Draft Scenic Integrity Levels." And this map is in conflict with the map: "Proposed Wilderness for Further Analysis, South Zone, Monticello." Areas shown as having a "Low" scenic integrity are included in several of the areas on the "Proposed Wilderness for Further Analysis" map. Those areas include Horse Mountain, Abaja Mountains, Dry Mesa, and Milk Ranch Point. How can these areas, which are supposed to be roadless and relatively untouched by man have areas with low scenic integrity included? I repeat: "Existing scenic integrity (ESI) is defined as the current state of the landscape, considering previous human alterations." (SMS p.I-2-Case Study)

The Flow Chart on page 6 of the SMS shows that "Constituent Information" is required for most phases of the process of determining the Scenic Integrity Objectives. Without maps showing each step of the process, the public is in the dark and cannot provide intelligent comments on decisions made by the Planning Team. Please provide the necessary maps - especially a Seen Area map for the Monticello Ranger District.

One additional note: On the maps provided almost all of the roads are designated for "high clearance vehicles." I haven't had any trouble driving my Prius (3 $\frac{1}{2}$ " ground clearance) on the primary road system that is maintained by the County. These maps should be more realistic.

This is my second set of comments on the Draft Revised Forest Plan dated October 2020. They concern cultural resources on the Monticello Ranger District.

Section 2.8 Cultural and Heritage Resources

Section 106 of the NHP A is the only protection being provided to cultural resources on the Monticello Ranger District in the draft plan, and it is a Federal requirement. Much more in the way of recognition and protective measures for cultural resources and cultural landscapes should be included. The two largest threats to these cultural resources are wildfire and grazing. Nowhere does this draft document discuss a requirement to limit grazing in areas with important cultural resources. Why not? Either you are going to protect cultural resources or you are not.

In the draft plan, the Forest Service seems to be saying that nothing is known about the significance of the cultural resources or the cultural landscapes on the Monticello Ranger District, and therefore a start will be made to identify them sometime in the future. The record shows that over the years more archaeological sites have been recorded than are needed for the Forest Service to recognize their significance by nominating National Register Districts and by nominating of specific sites to the National Register as required by Section 110 of the NHP A (Sec. 11 0(a)(2)(A)). Back in the 1950s the Monticello Ranger District proposed an "Archaeological Area" for Hammond Canyon (Gunnerson 1960). (I photographed the sign years ago when I was in that area [see photo]). The proposal was not implemented, but even in the 1950s the significance of the cultural resources on

the Monticello Ranger District was being recognized. In the late 1960s, an undisturbed archaeological site was found in Woodenshoe Canyon by Forest Service personnel. As a direct result, the first District Archaeologist was hired in 1970. Then in 1971 the Elk Ridge Archaeological Project was started. It lasted until 1974 and "over 2,000 archaeological sites have been located" (DeBloois 1975,vii). In the 50 years since that first District Archaeologist was hired, hundreds of additional archaeological sites have been recorded by subsequent District Archaeologists. The lack of a commitment in the draft plan to use the existing information about cultural resources and cultural landscapes to start providing recognition and protection for them indicates an unwillingness by the Forest Service to admit to the importance of these non-renewable resources.

Section 3.4.1 Elk Ridge Geographic Area: Goals (03) states: "Define, document and nominate a South Cottonwood Wash archaeological district or multiple property listing for listing on the National Register of Historic Places over the life of the plan." Over the life of the plan? The Forest Service already has all of the necessary information to nominate a National Register District. What the Forest Service doesn't have is a commitment to do this. It would require providing adequate funding to hire either an in-house archaeologist or an outside contractor to write the nomination. Either way, adequate funding is the key. This should be done immediately. In my files I found a copy of a 1992 draft "Request for Proposal: Monticello Ranger District Prehistoric Overview and Abajo Anasazi National Register District Nomination." Obviously nothing became of this attempt at a National Register District nomination. Why?

And nowhere in the draft plan (Sections 2.14, 2.8, 3 .4.1) is there mention of the "Record of Decision Modifying Specific Aspects of the January 12, 1993 Record of Decision" for the FEIS for Oil and Gas Leasing on Lands Administered by the Manti-La Sal National Forest. This decision created a "No Leasing" area of about 45,000 acres to protect cultural resources and cultural landscapes on the Monticello Ranger District. (See attached map.) While it was a start, an even larger area should have been protected. Why doesn't the draft plan acknowledge this decision and establish a cultural emphasis area on the District?

I repeat: The Forest Service has more than adequate information on the cultural resources and cultural landscapes on the Monticello Ranger District to start recognizing and protecting them now. It is inexcusable to claim that something will (may?) be done sometime in the indefinite future.

The significance of the cultural resources on the Monticello Ranger District has been ignored for too long. The revised Forest Plan should make some concrete decisions on cultural resource protection, not just vague promises that can be ignored by future Forest Supervisors.

References:

Gunnerson, James H. 1960 Archeological Survey in the Hammond Canyon Area, Southeastern Utah. University of Utah Anthropological Series #60. Salt Lake City.

DeBloois, Evan I. 1975 Archeological Report No. 2. USDA Forest Service, Intermountain Region, Ogden.

SEE LETTER SUBMISSION: Appendix I Map Showing the Revised NAL Area