Data Submitted (UTC 11): 5/5/2021 11:00:00 AM
First name: Owen
Last name: Severance
Organization:
Title:
Comments: 1. INTRODUCTION

This document is the United States Department of Agriculture, Forest Service[rsquo]s proposal for revising the Manti-La Sal National Forest Land Management Plan. What follows is an initial proposal that provides a starting point for public feedback and engagement as we enter the first formal public comment period, often referred to as scoping, of our environmental analysis process.

If this is a scoping document, what have you been doing for the last two years? You have been asking for public comment for well over a year. What[rsquo]s going on? I have to keep repeating my comments.

Page 6, top:

[bull] There is a need to inform the Forest Plan with the best available scientific information (2012 Planning Rule at Section 219.3).

Scientific information would be welcome. Where is it? This draft is so generalized as to be meaningless. I brought out my set of documents on the 1986 Forest Plan to see what was done differently back then. (Yes, I made comments on the draft of that Plan.) First, the 1986 documents used a lot of data to both show the existing condition and the proposed changes. None of that made it in to this draft Plan. Second, the proposals included activity schedules. The draft Plan just states that something may be done somewhere sometime in the future. No activity schedules for individual Ranger Districts are included, and few goals are included for the individual Ranger Districts because most of the draft Plan treats the entire Manti-La Sal National Forest as one unit. Third, there are no alternatives in the draft like there were in the 1986 Plan. Fourth, the locations of the Ranger District Offices and their descriptions aren[rsquo]t even included. Do a text search of the draft for [ldquo]Monticello Ranger District[rdquo] and it is found in only two places in the draft. Search for [ldquo]Moab Ranger District[rdquo] and it is only appears once. The 1986 Forest Plan states on page II-1: [ldquo]The Forest is made up of three divisions (see Figure I-1). It is managed by five Ranger Districts. The San Pitch Division and the west slope of the Manti Division forms the Sanpete Ranger District. The east side of the Manti Division is divided on the Huntington Canyon - Cottonwood Creek water divide, with the southern portion forming the Ferron Ranger District and the northern portion forming the Price Ranger District. The LaSal Mountain portion of the LaSal Division forms the Moab Ranger District. The Abajo (Blue Mountain) and Elk Ridge portion of the LaSal Division is the Monticello Ranger District.[rdquo] How hard would it be to include this information in the draft Plan? The 1986 Plan also showed how the Ranger Districts differed. This draft Plan appears to make the Manti- La Sal National Forest homogeneous. Nothing could be farther from the truth.

There is no discussion whether any of the goals from the 1986 Forest Plan have been met. If those goals haven[rsquo]t been met in the last 34 years, why should anyone expect this draft plan to produce any different results? The 1986 Plan states on page III-2:

[ldquo]Locate and determine the significance of paleontological, historical, and archaeological sites and, as appropriate, nominate sites to the National Register.

Thirty-four years have passed since the Forest Service made that commitment, and no archaeological sites or archaeological districts on the Monticello Ranger District have been nominated to the National Register. Now this draft Plan only proposes (p.108):

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.

That[rsquo]s sad. There are thousands of archaeological sites that are potentially eligible for the National Register, many more than on any other Ranger District on the Forest, and possibly more than any other Ranger District in the National Forest System. Yet only a non-defined district in the South Cottonwood drainage is mentioned. What about Lewis Lodge? What about the Doll House? They are just two examples of sites that should already have been listed on the National Register.

In Section 1.2, Need to Change the Forest Plan, nothing is said about the requirement to do the necessary work to comply with Agriculture Handbook No. 701, [ldquo]Landscape Aesthetics: A Handbook for Scenery Management[rdquo] before a revised Plan is produced. The Handbook states: [ldquo]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.[rdquo] The lack of an up-to-date visual resource inventory of the scenic values on the Monticello Ranger District, along with the lack of a map that shows all of the roads, trails, lakes, viewpoints, campgrounds and use areas on the Monticello Ranger District are among the largest problems with the draft Plan.

I found the following in a 2004 document: [ldquo]Preliminary Analysis of the Management Situation,[rdquo] that was part of a previous attempt at a revised Forest Plan:

Page 4-12. [ldquo]Topics where existing direction is inconsistent with meeting Agency direction[rdquo]

[ldquo]Scenery Management - Finding:[rdquo]

. . . [ldquo]In response to an appeal on November 18, 1993, an agreement between the Forest Service, Southern Utah Wilderness Alliance, and Owen Severance was reached stating that the Forest Service would complete a visual resource inventory of the Monticello Ranger District prior to revision of the Forest Plan.

[ldquo]Action:[rdquo]

[ldquo]We propose to:

Develop scenery management objectives as part of the desired conditions, which will utilize an inventory of landscape character, visual sensitivity, and scenic integrity. These attributes, along with the objectives, will provide the framework for the Scenery Management System. A detailed resource inventory will be completed to bring the Forest in compliance with the Scenery Management System prior to completion of the Forest Plan revision.

I[rsquo]m still waiting for the Forest Service to honor this commitment. Why wasn[rsquo]t it included in the draft Plan?

All-in-all, this draft Plan is a major disappointment. I suppose that the lack of activity schedules means that no one can be held accountable when the vague goals in the draft Plan aren[rsquo]t met. It is so vague that little can be learned about what is being proposed for individual Ranger Districts. And again I ask, what have the Forest Service personnel been doing for the last two years?