Moab City Council Agenda Item  
Meeting Date: October 12th, 2021

Title: Comment letter for the United States Forest Service Manti-La Sal Forest Plan Revision

Presenter: Mila Dunbar-Irwin

Attachment(s): Draft letter

Recommended Motion: I move to approve the comment letter for the Forest Service Manti-La Sal Forest Plan Revision.

Background/Summary: The Manti-La Sal National Forest signed its current forest plan in 1986, 35 years ago. The National Forest Management Act requires that all National Forests have land management plans to provide strategic guidance for how forests are managed for multiple uses. These plans must be updated to remain current. The plan revision addresses the ecological, social, and economic changes over the past 35 years by adapting to new scientific information, rules, and laws.

The City of Moab, in addition to County of Grand, San Juan County, and the Town of Castle Valley are cooperating agencies, a formal role available to local governments. Moab has periodically engaged with the USFS planning team during the last few years as they did the pre-planning tasks of this process.

The process begins with the United States Forest Service (USFS) putting together a draft plan revision, which then goes out to the public for a public comment scoping period. This period began on August 25th, 2021 and ends October 25, 2021, and is the time when interested parties can submit a comment asking the USFS to consider certain things, including alternative plans, for the Environmental Impact Statement (EIS). The Draft EIS will be published in Summer 2022 and will include the environmental consequences of implementing each of the considered alternatives. There is another public comment period after the Draft EIS is released, in which the City will have an opportunity to comment on the various alternatives the USFS has decided to propose. After this, the USFS will publish a Final EIS and Final Forest Plan, which will then have a 60-day objection period. The USFS will then resolve any objections and record the Final Forest Plan and Final EIS, followed by implementation and monitoring.
The current public comment period (to produce the Draft EIS) is where the Council has the opportunity to express their desired priorities and encourage the USFS to consider alternative plans. They must consider submitted alternatives, but there is no rule governing how much attention they give them, which is where the Council can weigh in.

For more background on the forest planning process from the Manti-La Sal planning website (https://www.fs.usda.gov/main/mantilasal/landmanagement/planning):

“Forest plans are legally required documents that establish broad, long-range, general management direction to maintain or achieve desired conditions. Together, desired conditions and objectives describe what actions Forest Service managers intend to implement across the Manti-La Sal landscape while still providing sustainable usage by individuals and communities. As forest and community needs change, forest plans should be amended or revised to respond to these changes and incorporate the latest scientific knowledge and understanding of land management.

The process of revising a forest plan includes the following steps: assessment, preliminary identification of the need to change the plan based on the assessment, development of a proposed plan, consideration of the environmental effects of the proposal (environmental impact statement), providing an opportunity to comment on the proposed plan and environmental effects analysis, providing an opportunity to object before the proposal is approved, and, finally, approval of the plan revision. The legal notice of intent was published on August 25th, 2021 in the federal register.”

The **Conservation Alternative** is an alternative Forest Management Plan for the Manti-La Sal put together by a group of organizations committed to responsible environmental stewardship and natural resource protection. It parallels the USFS Draft Plan in structure, format, and scope, and puts forth alternative options. The final plan can incorporate any aspects of the Conservation Alternative, and / or other alternatives submitted. The Draft EIS may or may not publish alternatives in full. This letter is seeking to support the publishing and full consideration of the Conservation Alternative. It does not support all aspects of the alternative plan, but merely the full consideration.
More information on the Conservation Alternative from their website (https://www.mantilasalconservationalternative.org/):

“Compared to the MLNF draft plan, the Conservation Alternative places greater emphasis on the following:

- Reasonable sideboards on uses of the forest and its natural resources in light of the climate crisis
- Protection of native species and habitats over intense commercial and recreational pressures
- Meaningful inclusion of Tribal perspectives and proposals in planning and management
- Important commitments of the MLNF to the public throughout the life of the plan

Since 2019, several non-governmental conservation organizations have been contributing to the development of a Conservation Alternative to the Manti-La Sal NF (MLNF) initial draft plan. It is our vision of how the Manti-La Sal NF should be managed and cared for by the Forest Service and users in the coming 10-15 years.

The MLNF released its preliminary draft plan to the public on October 1, 2020. We released a draft Conservation Alternative to the public on October 5. The Conservation Alternative parallels the MLNF draft plan for all sections and elements (Goals, Desired Conditions, Objectives, Standards and Guidelines) so that the two plans can be directly compared. The two plans are similar for some elements, but also differ in significant places.

The alternatives section should present the environmental impacts of the proposed action and the alternatives in comparative form based on the information and analysis presented in the sections on the affected environment (§ 1502.15) and the environmental consequences (§ 1502.16). In this section, agencies shall:

- Evaluate reasonable alternatives to the proposed action, and, for alternatives that the agency eliminated from detailed study, briefly discuss the reasons for their elimination.
- Discuss each alternative considered in detail, including the proposed action, so that reviewers may evaluate their comparative merits.

Generally, the federal agency (in this case the Manti-La Sal NF, or MLNF) that is undertaking an EIS develops alternatives out of comments provided by the public (including Grand County, other agencies, businesses, scientists, citizens) during a scoping period. But in fact, other agencies and non-government organizations and even individuals can submit comprehensive alternatives that parallel the agency alternatives. If an alternative is reasonable and different from the agency’s
alternative(s), it can be expected to be published and compared to agency alternatives in the Draft and Final EIS. This has happened many times before.

It is important that the Conservation Alternative appear in the Draft EIS because the MLNF will then need to compare the environmental consequences of implementing each of the alternatives. It also allows the public to comment on which pieces of which alternatives they would like to see in the final forest plan.

In its final forest plan (in Summer 2023), the MLNF can incorporate pieces from any/all of the alternatives displayed in the Draft EIS (Summer 2022)."