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First name: Michael Last name: Bald

Organization: Got Weeds?

Title:

Comments: Thank you for the opportunity to comment.

The soils section in the Notice of Proposed Action is remarkably thin; not sure whether that is a reflection of current conditions on the national forest or simply a parallel to the 2006 Forest Plan (outdated). In reading the soils paragraph, the focus is entirely on erosion control along roads and trails. The functionality of healthy soils is described and Goal 3 of the Forest Plan (outdated) is referenced but nothing more; this seems minimalist. Is further information available to support the proposed actions?

Some of the proposals would help build the soil organic matter; leaving cut material on site in the 348 acres of oak habitat enhancement is a good move. Spraying or squirting herbicide would not be at all positive, however. Have soil tests been carried out to pick up on mineral deficiencies, compaction issues, and percentages of soil organic matter? I run into those situations periodically: low organic matter, low calcium, and soil compaction. Section 2.3.2 of the 2006 Forest Plan (outdated) lays out some guidance for ensuring adequate soil depth (G-3) and addressing deteriorated conditions (G-14). If exposed tree roots and widespread bare mineral soil are indicators of deteriorated conditions, I'd say we have a big problem. And there is plenty of "reduced vigor", just to highlight another indicator from page 22; I have seen it while pruning trees this winter.

Knowing the history of a site is also vital; people have described how their land was bulldozed to keep it from regenerating quickly. Another client with virtually no topsoil mentioned that it had all been trucked off decades ago to supply material for a dam construction project. She definitely had little left to work with. I suppose there is a socio-economic aspect to that story: people sell off their topsoil to make ends meet and then end up worse off in the long run. I don't have all the details and history, but I hope the Forest Service will do some deeper digging to get a true understanding of the soil conditions throughout the Telephone Gap project area. Or maybe that has been done already, since the actions have already been proposed; please share those results. Thank you again.