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Comments: Comments on Revised Draft Plan for Coconino National Forest.

My comments address concerns about soil condition under the plan, and how the plan will be able to improve soil health, and thus, the health of the forest ecosystem.

I applaud the objective stated in FW-Soil-Obj: "Maintain satisfactory soil conditions and improve impaired and unsatisfactory soil conditions on 100,000 to 350,000 acres during the 10 years following plan approval". I believe that alternative C is the best alternative to achieve this goal because it prioritizes activities that cause the least ground disturbance as stipulated in FW-Soil-G.

My concerns are the following:

1)The DEIS states on pp 100 that "Most areas where crusts have been observed show damage to biological soil crusts and currently cover less than 5 percent of the soil surface. Biological soil crusts are most prevalent in coarse-textured soils especially in Piñon-Juniper and Semidesert Grassland (Steinke, R., personal observations, 1989-2011)."

However, according to FW-Soil-DC in the Draft Plan "Biological soil crusts are present with limited soil disturbance (<1/3 of area impacted) and functioning on coarse textured and sandy soils."

Which is correct, "most areas" show damage, or "limited soil disturbance" ?

Since biological soil crusts are critical in soil productivity and stability, but they are poorly adapted to compressional disturbance. Therefore, areas with these soils should have the highest protection possible, with largest possible area in wilderness.

I am concerned the plan allows 30% disturbance on the soil crusts, and ask what research demonstrates this is compatible with FW-Soil-Obj.

2)The DEIS states on page 100: "Compared to alternatives B and D, implementing direction in alternative C plan direction would probably result in similar improvement in soil condition and productivity. Few roads and motorized trails are present under current conditions and so the improvement to soil would be small." Perhaps soil improvement would be small, but prevention of future damage would be prevented. The DEIS statement ignores the fact that it has been very difficult to monitor and enforce off-highway vehicle use. I have seen many places where OHV traffic has gone completely off road, destroying soil cover and structure. Designated wilderness and semiprimitive nonmotorized will provide the most protection for soils, which promotes FW-Soil-G.

3)In addition, although it is not mentioned in the Plan or the DEIS, larger and more wilderness areas will increase the connectivity of habitat. This may encourage top predators to increase their range. In Yellowstone, the arrival of wolves served to improve many parts of the habitat, including soil and water. This was attributed to moving the grazing wildlife and preventing trampling of soils and vegetation. On the Coconino, trampling by elk is one of the stresses on soils recorded in the DEIS. A healthy ecosystem, complete with top predators can help restore forest resources as in the plan objective, FW-Forest-G.

4)The DEIS discusses the predicted impacts of climate change, (p567) as drought and temperatures will bring many changes to the forest. Understanding that drought, increased fire, catastrophic storms, and vegetation changes will all contribute to soil erosion, it is critical that the plan allow for the most protection of intact ecosystems. The DEIS states: "Promote interconnectedness of continuous blocks of habitat to allow for adaptation, including genetic and behavioral interactions; and Maintain the abundance and distribution of habitats

to support recovery or stabilization of federally listed and other species." (Pp 567). These goals are best met with the maximum area in wilderness and primitive nonmotorized designation, Alternative C.