



Soils

Eligible Objectors & Interested Persons for this issue:

- Sierra Club/Alliance for the Wild Rockies
- The Lands Council
- Stevens County Cattleman's Association

Objections:

- The revised Land Management Plan (LMP) and final Environmental Impact Statement (FEIS) do not provide meaningful forest-wide soil standards. The LMP therefore fails to conform with regulation (FW-STD-SOIL-01).
- The revised LMP does not disclose the total area needing soil restoration and does not disclose losses of soil productivity due to foreseeable increases in noxious weeds.
- There is no limit set for soil loss or damaged by livestock, harvest, or human use. The revised LMP therefore does not conform with Region 6 Soil Quality Standards and Guidelines.
- The FEIS does not examine the impacts of proposed management actions on the six soil functions identified in the Forest Service Manual, nor does it quantify impacts on future timber yield due to cumulative soil damage.
- The FEIS presents no quantified analyses of the impact of past management activities on soil quality and productivity. The adequacy of stated soil quality standards to address soil damage is therefore unknown.
- The revised LMP adopts a proxy—detrimental soil conditions (DSC)—rather than more direct measures of management-induced losses or reductions of soil productivity. The adequacy of this proxy is questionable.
- The revised LMP does not assess the cumulative impacts (current or projected) of log landings and does not set a limit for total DSC from landings.
- The revised LMP does not compel the Forest Service to take actions to restore soil productivity in areas that are not within the boundaries of project areas.
- The FEIS does not disclose that DSC limits are based on the amount of damage that is operationally feasible, not scientific data that measures land and soil productivity losses.
- The revised LMP definition of DSC only considers alterations to physical properties, not chemical or biological properties. This is inconsistent with best available science.
- There is no quantitative monitoring data that demonstrates the FEIS's recommended DSC activities have reduced an active area's DSM from violating the standard.
- Concern about the restoration of soil processes and function at a pace of 20 to 30 acres over the next five years.

Resolution Options Proposed by Objectors:

- Establish guidelines and standards that suspend grazing authorizations in upland meadows and other high concentration grazing areas where soil damage, loss of ground cover (including native grasses & shrubs) exceeds 85% of historic range of variability (including pre-grazing of domestic livestock); [The Lands Council]



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- Provide clearly worded and closely enumerated description of objective methodology (meaning numeric, using peer-reviewed methodology) to produce measurable and repeatable metrics. [Stevens County Cattleman's Association]