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Ranger Kris Stein, Joseph Mountains Office
Wallowa-Whitman National Forest
P.O. Box 905
Joseph, OR 97846

Dear Kris,

The Wallowa County Board of Commissioners appreciates the opportunity to provide input during the objection period of the Cold Elk Range Analysis Draft Decision Notice & Finding of No Significant Impact for Wallowa County on National Forest Lands.

Page 1 Alternative 2 - Proposed Action

This decision authorizes livestock grazing within the Cold Spring and Teepee Elk Allotments of the Cold Elk Range Analysis project area and closes the Lost Cow Allotment. The proposed action will 1) reduce the grazing season from six months to five months, 2) reduces utilization standards in three pastures with unsatisfactory locations, until those pastures are determined to be in satisfactory condition, and 3) adds the design criteria of deferment, rest and fencing to further protect resources. Specific actions within each allotment include:

Objection: We object to the reduction of the grazing season from six months to five months. Much of the current research is showing that flexibility in management is often the most effective in controlling invasive annual grasses. Preliminary data from field trials and ongoing research is looking at early or late grazing as tools to control annual grasses. Reducing the grazing season is limiting our opportunity to do such management in the future. We understand that the current permittee may not need the early and or late grazing under current management planning. This change can be accomplished in the Annual Operating Plans while leaving the AMP at the longer season to allow for different management options in the future. This is particularly true with this permit as when it was (and may be in the future) connected to the private land around it; early season grazing is very important.

Page 2 Cold Springs Allotment

Rest - Grazing will not be authorized for up to five years in Lower Cottonwood pasture of Cold Spring Allotment, to allow for stream and riparian recovery from 2017 debris flow. If the Forest Service determines that the area has recovered to satisfactory condition prior to the end of the five years, then grazing use could be authorized.

Objection: This decision is attempting to fix a problem that was not caused by livestock and this will fail. The same effort of keeping livestock off the riparian area can be accomplished by much

less drastic measures. To not authorize grazing is very problematic in an AMP. Grazing should be authorized and then discussion of resting for a number of years will allow you to return to grazing with much less effort.

Page 2 Cold Springs Allotment

Rest - Grazing will not be authorized in Upper Cottonwood pasture every other year to allow for continuing recovery of riparian vegetation from the effects of the 1988 Teepee Fire.

Objection: We object to this action. We disagree that resting the area and restricting grazing to fix effects of a fire that occurred over 30 years ago is appropriate. We recommend deferred grazing, a proven management strategy that will do as much good as resting the pasture to repair damage done by something other than livestock.

According to Society of Range Management, 2004, "Deferred grazing is the delay of grazing in a nonsystematic rotation with other land units and rotational-deferred (deferred-rotational) grazing is a systematic rotation of the deferment among pastures."

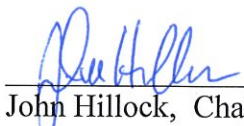
Both strategies have been successful in restoring and improving riparian areas and the amount of bank sloughing was found to be statistically similar on non-grazed control pastures along northeastern Oregon's Meadow Creek (Buckhouse et al. 1981). We propose implementing one of these strategies in place of a no grazing alternative. This will provide grazing access and will accomplish the same result while still providing the grazing alternative.

Page 2 Teepee Elk

Construct new fence - Exclude cattle from grazing within the riparian area of Peavine Creek of Elk Pasture to protect steelhead habitat. Water gaps would be provided approximately each .5 mile at naturally hardened areas and where suitable spawning substrate is not present. This action would enclose about 1.5 miles (60 acres) of Peavine Creek.

Objections: We object to this action. This is adding 1.5 miles of fence to again fix a problem that is not caused by cattle. Instead, the action protects a riparian area invaded by conifer trees in high densities that limit the natural characteristics. Without addressing the conifer problem, removing cows will not rectify the direct ecological issue. Before this double fence proposal is implemented a single fence should be attempted along with herding. Additionally, more effort could be made to address the forestry problems in this headwater area to increase water quantity and flow. Fencing this riparian area with the density of conifers will not only show little change on riparian health but it will create a significant maintenance issue.

Sincerely,


John Hillock, Chairman


Susan Roberts, Commissioner


Todd Nash, Commissioner