

Ranger Kris Stein, Joseph Mountains Office

Attention: Andrea Holmquist

Wallowa-Whitman National Forest

P.O. Box 905

Joseph, OR 97846

Dear Andrea,

Rock N' J Properties appreciates this opportunity to provide input on the Cold Elk Range Analysis Draft Environmental Assessment for Wallowa County on National Forest Lands especially as it pertains to the TeePee Elk allotment. This input, out of necessity, will be general in nature because we were not informed of the impending 2/11/20 midnight deadline by any Forest related employee or staff and had to rely on our concerned neighbors and friends. We established "standing" in the first comment period and have received no information since. Not even an acknowledgment we have "standing". The process was and is tainted.

Rock N' J is a family owned and operated Ranch. We operate with integrity, honesty and always operate within the boundaries of good stewardship, sustainability and better yet embrace the concept of regenerative resource management. We work openly and honestly with the Forest Service. We always have and will continue to do so.

You might imagine our surprise when we found out for the first time the Elk Pasture was in a deteriorating condition and Peavine Creek (which is dry with very little pooling through the summer and frozen solid through the winter) was in an unstable condition due in most part to timber encroachment and not livestock use. You can also imagine our even greater surprise when we were told that we would be held to a 6 inch stubble height standard until the Riparian Fence along Peavine was completed. We also will have a hard and fast entry date into the pasture of July 15th until the fence is completed (remember there has never been a steelhead or salmon observed that high in the drainage) and a rest imposed on all pastures for 1 in 3 years which will be difficult to accomplish at best and impossible without the immediate fencing of the creek.

At this present time there appears to be very little flexibility by the FS relative to implementation. There are not funds to build the fence, no plans, absolutely nothing but a reduction in stocking rates until the fence is completed. There are also no plans to manage the timber resource within the pasture. This in my mind leaves all of us in an unacceptable place. This is a no win situation for both permittees, the Forest Service, and the livestock community as a whole. You have set all of us up for failure. We have worked in partnership, openness and in the spirit of fair play and now instead of a well planned approach to resource management we will have a hurried, unplanned knee jerk reaction to a serious problem!

Chris Cunningham/Rock N' J Manager

