Data Submitted (UTC 11): 11/18/2019 11:00:00 AM
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Organization:
Title:
Comments: Re: Comments on the Sunflower Project Area Proposals-Transmitted via email

Please accept the following comments regarding the contemplated Sunflower Project Area Proposals:

Livestock Grazing:

Prudent and well managed livestock grazing practices can provide beneficial resource outcomes. However, decades of poorly managed grazing activities have resulted in significant environmental degradation throughout the Sunflower Project Area. The recovery and rehabilitation of the subject area will require meaningful and significant changes from previous grazing practices.

The historic grazing practices in and near riparian areas have created significant stream bank erosion and sluffing. Large denuded stock trails in the riparian zone have also increased the sediment load going into the associated waterways. Throughout the Project Area damaged and sensitive riparian areas, along with the associated waterways, should be identified and protected from further damage by employing temporary electric fencing to eliminate stock grazing in and around these fragile sites.

Noxious weeds have become an ever increasing threat to the environment. Fortunately, the Forest Service has generated several "Best Management Practice for Weed Control" publications, and the pertinent techniques and language from these documents should be incorporated into all grazing permits in the subject area.

Fecal coliform testing in major wet drainages on or near the Forest Boundary should be conducted before and periodically after the issuance of grazing permits. This will establish that the authorized grazing is not resulting in unhealthy water discharges from the Forest into the nearby John Day river system.

The acreage that is found in the sensitive riparian zones, rehabilitation areas, private in holdings, noxious weed sites and other use areas should be eliminated from the AMU holding capacity calculations. In other words, the number of AMUs should be reconciled to reflect the revised range and resource management objectives in the Sunflower Project Area.

Roads:

The proposed closure of the roads delineated on the project area map were well selected for decommissioning. The remaining open system roads will still allow adequate access for management and recreation in the project area without unduly threatening wildlife security.

Wildlife:

The inevitable increase in the number of large predators (wolves and lions) in the Sunflower project area should be considered in the contemplated wildlife enhancement projects. The ungulates will react to increases in predation pressure by seeking new winter ranges, migration routes and calving areas. Factoring increase predation considerations into the enhancement projects locations and objectives, should help to address some of the negative dynamics of the ever increasing number of large predators in the Project Area.

Rehabilitation:

Fire events should play an essential role in restoring the ecosystems in the Sunflower Project Area. A concerted and routine regiment of controlled burns should be at the core of the rehabilitation efforts throughout the subject area. On the other hand, unchecked wildfires can cause enormous damage and should be aggressively fought using all available resources. In appropriate and protected riparian areas, the reintroduction of small pocket stands of Aspen would provide for a more historic stand composition in the project area and should be considered.

Thank you for the opportunity to comment on the proposals for the Sunflower Project Area.

Chris Paulson