

Mark and Amy Ramsden

February 11, 2020

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

Dear Kris,

We appreciate the opportunity, as USFS permittees on the Cold Springs allotment, to provide input during the objection period of the Cold Elk Analysis Draft Decision Notice and Finding for 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. We would like the grazing season to be for six months, from May 15 to November 15. Any 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. 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.

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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. On the contrary, the problem was caused by a forestry management decision to not log Cottonwood after the TeePee Butte fire. Which 30 years later the timber had fallen and littered the bottom with debris. In the recent flood that debris washed down the creek and in some places eroded the stream bank vertical and in other places widened the stream channel. Since

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the flood there has been minimal signs of cattle on the creek bottom. We think that cattle, with the right AOP, will have a positive effect on the creek. To not authorize grazing is very problematic in an AMP. Grazing should be authorized and then discussion of pasture management will allow a return to grazing with much less effort.

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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 of attempting to fix effects of a fire that is over 30 years old by resting the area and restricting grazing. It is a proven management strategy that deferred grazing will do as much good as rest 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. Both strategies were found to be statically similar in the amount of bank sloughing that occurred on non-grazed control pastures on Meadow Creek in northeast Oregon (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.

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Defer - Grazing will not be authorized during June in spring use pastures, every third year, to allow bunchgrass to mature and seed. Grazing will be authorized from July through October each 3rd year. In other words all pastures will be deferred of June grazing 1 year in 3.

Objection: The months of May and June are our breed up pasture times. With the establishment of wolves, and the fact that it's a critical time for our cows to be bred, we need to be in good breed up pastures. Pastures that are not steep and that are easily accessible for herding and protecting our cattle from wolves. The wolves have already made a change, causing us to have fall calves, which means they are not getting bred on time causing financial hardship for us. Where is our breeding pasture under this proposal? We have not seen any pasture proposals, so we object to this until we see what the plan entails.

Page 2 Mitigations

These mitigations are included under Alternative 2.

Actions to protect springs would include constructing new or enlarging fences around springs and replace water troughs in the Cold Spring Allotment at; Road Gulch in North Cold Spring Pasture, Old Barrel in Lower Basin Pasture, Cold Spring 1 and 2 at Cow Camp, and Wild Horse

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Spring in North Wild Horse Pasture. One location in Teepee Elk Allotment at Long Ridge 2 in Long Ridge Pasture.

Additional mitigation measures in Cold Spring Allotment include construction of short stretches of fence to define pasture boundaries and encouraging redistribution within the pasture. These locations are as follows; Dry Creek Trail and 5 Points Trail in Cook Creek Pasture, Howard Crossing Trail on East Fork Cottonwood Creek in Upper Cottonwood Pasture, and Deadhorse Creek Trail on the boundary of the Beef Pasture and Lower Cottonwood Pasture.

Objection: We oppose if, us as the permittees, have to do all the work. It is a heavy financial burden on us. We support the proposal if the USFS does the construction and we will do some of the maintenance. Plus this proposal is new to us, we haven't seen the plan details. Presently we are expected to do deferred maintenance from previous permittee that wasn't enforced by the USFS for the past 30 years. As always, we will do our best to help out by working with the Forest Service range department on annual goals.

Sincerely,

Mark A. Ramsden

C. Amy Ramsden