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October 6, 2025

Umatilla National Forest Supervisor's Office
Attn: Blue Mountains Forest Plan Revision
72510 Coyote Road
Pendleton, OR 97801

Forest Land Management Plan Revision Team,

The Washington Department of Fish and Wildlife (WDFW) has enjoyed a long standing and valued relationship with the United States Forest Service (USFS), the Forest Supervisors, and staff within Washington state. In Southeast Washington, we regularly work in partnership with the Umatilla National Forest, and WDFW appreciates the effort and hard work the USFS and Umatilla National Forest has put into the Preliminary Draft Proposed Blue Mountains National Forests Land Management Plan.

The comments provided by WDFW are intended to assist the Forest Plan Revision Team in improving the plan and developing alternatives in the upcoming draft Environmental Impact Statement. Our comments reflect WDFW's mission: "To preserve, protect and perpetuate fish, wildlife and ecosystems while providing sustainable fish and wildlife recreational and commercial opportunities," within the state of Washington and across all ownerships. Land management decisions on federally owned and managed lands affect fish and wildlife species and their habitats and thus can have an impact on our ability to fulfill our mission. This clearly speaks to the need for our continued cooperation and partnership.

Comments on specific sections of the Draft Land Management Plan document for the Umatilla National Forest are as follows:

WILDLIFE

Page 56, Species Diversity (SPDIV), Desired Conditions (FW-SPDIV-DC), 01. WDFW suggests adding … in a manner that encourages elk to remain on public lands "year-round" and…

Page 58, Desired Condition (FW-SPRSK-DC), 04. Add "native pollinators" along with bumble bees and monarchs.

Page 58, Desired Condition (FW-SPRSK-DC), WDFW suggests adding a section on bats, which fits with the Desired Condition 03), 05), and 06). WDFW suggests adding a section for forest raptors (specifically goshawks, golden eagles, and great gray owls), which fits with the Desired Condition 08).

Page 60, Guidelines (FW-SPRSK-GDL), WDFW suggests adding a statement about bighorn sheep. Consider adding "To prevent the introduction or spread of pathogens in bighorn sheep, management shall quantitatively assess risk of contact between bighorn sheep and domestic sheep and goats and estimate the potential for pathogen transmission using the best available information including the "risk of contact" model, indigenous, and local ecological knowledge."

Page 61, Management Approach (FW-SPRSK-MAPR), Wolves 05: WDFW recommends adding "Increased and regular human presence (e.g., ranch employees, family members, or sheep herders) to protect livestock by patrolling the vicinity occupied by livestock on a daily or near daily basis." to best management practices.
Page 61, Management Approach (FW-SPRSK-MAPR), Bighorn Sheep 06. WDFW recommends adding:

- As opportunities arise, reduce risk of association either by closing or converting (to another species with lower transmission risk) domestic sheep or goat allotments, grazing permits, or tenures that overlap, or are within foray distances of, wild sheep habitat.
- Restrict domestic goats as pack animals by people that travel or hunt in areas at risk of contact to bighorn sheep.

Page 65, Transportation Infrastructure (TRNSPT), Introduction, WDFW recommends including standards and guidelines that will be used to develop the forest management plan. A comprehensive Travel Management Plan is critical to maintaining ecological integrity on the forest and will be crucial for meeting desired future conditions.

The proposed recission of the 2001 Roadless Rule that USFS announced in June 2025 could impact fish and wildlife habitat. WDFW is particularly concerned about high road densities (>2 miles/square mile) that reduce cover for elk at large scales. These high road densities will likely redistribute elk to secure habitat, if available at the scale necessary for elk. WDFW is particularly concerned about the summer and fall time periods when summer nutrition is critical and fall hunting pressure will be intense.

The main drivers of elk populations are cow survival and recruitment, both of which are driven by habitat. The quality of summer habitat (Blue Mountains elk nutrition and habitat models) has been found to be a very important influence on elk population reproductive success. The main two metrics in the model are cover and road proximity. The reduction of cover in large portions of the forest will make road density that much more important in helping elk meet their nutritional needs. If security cover is reduced below a threshold, elk may move to low quality habitat or off the Forest to private lands, which would further require WDFW to address depredation concerns by reducing the elk population.

Page 67, Transportation Infrastructure (TRNSPT), Management Approaches (FW-TRSPT-MAPR), WDFW recommends including another point to maintain functional use of gates to ensure road closures are upheld and add gates when seasonal closures are not observed.

Page 84, Rangelands, Forage, Livestock Grazing (RNG), Guidelines (FW-RNG-GDL) 06. WDFW recommends change to standard and modify that Ecological vegetation condition "shall" be determined by a rangeland health assessment or data collection.

Page 175, Appendix B: Proposed and Possible Actions, Wildlife, WDFW recommends modifying activity to "Utilize vegetation management, increasing cover and other activities to improve distribution of elk and encourage elk to remain on public lands."

RANGELANDS

General comments: The draft plan language places emphasis on expanding livestock grazing, which may create an imbalance in management direction. Grazing objectives should be framed more neutrally and be tied to monitoring results, with adjustments made based on local ecological conditions. There is also very little mention of riparian impacts and how grazing will be managed to minimize damage to riparian areas.

Desired Conditions:

In listed sections on Page 82 of the Draft Proposed Blues Land Management Plan:

- 02: WDFW requests that USFS list the ground cover percentages in the NRCS ecological site descriptions.
- 06: Clarify wording – WDFW suggests something like: "Rangeland allotments provide sustainable forage that maintains or increases ecological integrity, which supports grazing of permitted livestock that contribute socially, culturally, and economically to local ranching operations and communities."

Objectives:

In listed sections on Page 82 – 83 of the Draft Proposed Blues Land Management Plan:

- 01: This has an emphasis on "seeking opportunities to expand use" and is not clear that site specific conditions may require temporary/full time reductions to AUMs or seasonal use. To improve rangeland health and general ecological integrity, equal weight should also be given to maintain and suspending use, as appropriate.

Guidelines:

In listed sections on Page 83 of the Draft Proposed Blues Land Management Plan:

- 01: It's unclear whether perennial nonnative plants will be planted/seeded, or just utilized as forage where previously existing.

Management Approach:

In listed sections on Page 84 of the Draft Proposed Blues Land Management Plan:

- 01: One year of rest is usually the minimum following a wildfire but depends on site conditions. Also, will deferment or rest be considered because of any other ecological processes? i.e. drought, overgrazing, etc.
- 02: Measures to assess ecological integrity, such as C&T or MIM, should *inform* (not include) range improvements. WDFW recommends revising the language to clearly distinguish between outcome-based measures of ecological condition and management actions taken in response to monitoring results.
- 03: This section also emphasizes increasing use, not managing based on local site conditions.

FORESTRY

WDFW supports the implementation of forest management efforts that shift forest structure and composition, landscape patterns, and density to align with the historic range of variability, acknowledging the significant impact of catastrophic fires in altering habitats over the past decade.

- In listed sections on Pages 27- 81 of the Draft Proposed Blues Land Management Plan:
- (Pg.27-28). Management Approach (FW-WF-MAPR) describes using wildland fire, fuel treatments, vegetation management, and targeted grazing to manage wildfire risk in Community Protection Areas. WDFW supports the strategic use of ecologically sound land management activities that prioritize implementing fuel modification near communities and infrastructure that are at risk to wildfires and promote fire-adapted landscapes. WDFW applauds the USFS plan to partner with local entities to harness the power of collaboration to implement fuel reduction projects. WDFW recommends that the planning process incorporate best available science for fish, wildlife, and their habitats to ensure that fuel reduction efforts do not consequently impact wildlife and their habitats.
- (Pg. 28). WDFW recognizes that past and present land use practices have resulted in homogeneous forest conditions that allow for native insects and diseases to spread at a rate that is outside of the historic range of variability, resulting in uncharacteristic disturbance patterns across the landscape. WDFW supports Management Approach (FW-INSDIS) that aims to shift forest conditions to support ecologically resilient and resistant forests and limit the temporal and spatial scales of insect and disease disturbances. WDFW recognizes the importance of FW-FOR-OLD-DC-03 and FW-SNAG-GDL-02 that provide desired wildlife habitat components such as hollow trees, dead wood, dead tops, and mistletoe brooms.
- (Pg. 30-31.) WDFW supports (FW-INV) and the need to stop the rate of spread of terrestrial and aquatic invasive species. WDFW recommends that minimum and maximum buffers be established for herbicide application near fish bearing waters and that there is a requirement to use aquatic-labelled herbicides in treatment areas that are upslope from waterways to reduce the impact to aquatic organisms and habitat.
- (Pg.33). WDFW supports (FW-WTR-GDL-01) that aims to protect water quality by improving the design and construction of roads and landings to avoid or minimize: 1) delivery of water and sediment to streams, 2) interception of surface and subsurface flow, and 3) routing water on unstable channels, fills, and hillslopes. If feasible, WDFW recommends using the existing 2019 Pacific Northwest Region Aquatic Restoration Project

Environmental Assessment to coordinate with the terrestrial projects, in coordination with salmon recovery partners where feasible. This coordination should include opportunities to remove or enhance stream crossings for aquatic organism passage (AOP) and the subsequent benefit to fish, fish habitat, and streams. Given the direct relationship between roads and the potential for unwanted sediment delivery to streams, we recommend considering the potential impacts and benefits of coordinating additional road work covered under the Pacific Northwest Region Aquatic Restoration Project Environmental Assessment, to maximize the funding resources available to improve the aquatic environment.

- (pg. 36). WDFW supports Management Approach (FW-CON-MAPR) Collaborate with state agencies and other land managers across broader landscapes to promote connectivity of terrestrial, riparian, and aquatic ecosystems in the Blue Mountains. We encourage the USFS to work closely with stakeholder groups, including but not limited to state agencies, tribes, partner organizations, and private landowners to set cross-boundary priorities that improve landscape connectivity and support aquatic and terrestrial species dispersal.
- (Pg.37-46). WDFW supports the use of best available science and ecologically sound silvicultural practices to promote forested ecosystems with ecological integrity in their composition, structure, function, and connectivity. The preliminary Land Management Plan describes management approaches to address forest vegetation (FW-FOR-MAPR), density (FW-FOR-DEN-MAPR), composition (FW-FOR-CMP-MAPR), and structural stages (FW-FOR-STR-MAPR); but lacks sufficient detail in how project analysis will occur and the level of stakeholder engagement that will be required in the development of project-level plans. We recommend the final Land Management Plan require a collaborative planning process at the watershed or subbasin scale to support project level planning. We recommend a comprehensive monitoring and reporting program be incorporated to increase transparency and adherence to plan objectives and desired results. WDFW recommends monitoring actual conditions to use as a basis of comparison for target conditions to inform treatment plans. WDFW recommends including a requirement for post-treatment vegetative and biological species response monitoring to inform adaptive management.
- (Pg. 46-48). FW-FOR-OLD-GDL describes numerous exemptions to the restrictions on felling or removing large, old, or legacy trees. Tying exemptions to Community Protection Areas and future project plan components allows for broad interpretation. As affected communities grow, these areas will continue to adjust such that more and more old forest stands and trees will become subject to these exemptions, resulting in a lack of protection for these biological resources. WDFW would like to see additional restrictions for old forest stands and individual trees that meet ‘old growth’ characteristics. If this Management Approach increases opportunities for management within old forest stands or individual trees, then we recommend the USFS include a framework for how the USFS will review and approve treatments within these stands. We recommend that there be a requirement for the USFS to utilize a collaborative approach with stakeholder groups, including WDFW, at the forest and project level to identify restoration objectives, develop treatment plans, and implement restoration prescriptions within the LSR. We recommend that both compliance and post-operational monitoring be required to ensure that prescriptions and objectives are met.

- (Pg. 48-49). WDFW supports the protection, retention, and creation of snags and down wood consistent with FW-SNAG-DC. WDFW does not support exemptions for salvage logging in FW-SNAG-GDL-01 as there is no scientific consensus that salvage is substantially beneficial to ecosystem health and numerous studies have demonstrated that salvage logging can have negative impacts to wildlife, particularly birds and cavity dwelling wildlife.
- (Pg. 52-53). WDFW supports FW-VEGNF-MAPR and the protection and restoration of non-forest vegetation, considerations might include ecological site potential, ecological integrity, and site-specific desired conditions based on the best available science
- (Pg. 55-58). WDFW supports FW-SPDIV-MAPR and FW-SPRSK-MAPR. We support the use of ecologically sound forestry practices and silvicultural activities to improve and protect priority species and habitats. We suggest that the Land Management plan include a framework for evaluating project-level that could impact priority habitats and listed species. We believe that state wildlife agencies, such as WDFW and ODFW, should be part of the consultation process when making these evaluations.
- (Pg. 80-81). WDFW supports FW-FORPROD-MAPR and agrees with the guideline that silvicultural treatments should be designed to maintain or restore ecological integrity and not based solely on their ability to provide the greatest dollar return or output of timber. WDFW recognizes the emergence of silvicultural systems such as "individuals, clumps, and openings" and free selection as optimal methods for creating variable forest spatial patterns that emphasize greater ecological complexity and adaptability over traditional silvicultural methods.

FISHERIES

Document: Evaluations for Wildlife Species Considered for Species of Conservation Concern

Sturgeon

Pg 5. In Rationale Statement for White Sturgeon, it says "the population of white sturgeon in this riverine area is considered of sufficient size to allow for limited angler harvest…" There is no allowed angler harvest in this area. Catch and release angling is allowed, and while there will be some loss associated with this fishery there is no directed harvest. WDFW requests the USFS revise the language to reflect catch and release only fishing regulations.

Inland Columbia Basin Redband Trout

Pg 2094 Redband trout maps do not show populations in the Tucannon River or Asotin Creek Basins. WDFW requests the USFS coordinate with our fish biologists to ensure the maps of redband trout distribution in Washington are accurate.

Species of Conservation Concern list - Umatilla National Forest

- WDFW requests that USFS include Species of Greatest Conservation Need (SGCN) listed in Washington's State Wildlife Action Plan (SWAP) on the Umatilla National Forest Species of Concern List. An updated SWAP is scheduled for completion in December 2025.
- WDFW requests including federally listed fish species (steelhead, bull trout and spring Chinook) in the Species of Conservation Concern list. They were included as aquatic species at risk in the Draft Summary Assessment.
- Although not listed by Washington State, Oregon considers American marten as a state sensitive species and this species does not appear on the Umatilla National Forest list.
- Wolverine is mentioned in the report but doesn't show up on any of the 3 NF lists.

We appreciate the opportunity to provide comments on this forest plan revision and more importantly the long-standing cooperative relationship between WDFW and the Umatilla National Forest which benefits fish and wildlife, and people in Southeast Washington. If you have any questions regarding these comments, please feel free to contact me.

Sincerely,

Mike Kuttel, Jr. Eastern Region Director