Washington Native Plant Society
Appreciate, Conserve, and Study Our Native Flora

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October 6, 2025

Eric Watrud, Umatilla National Forest Supervisor
Michael Neuenschwander, Blue Mountains Forest Plan Revision Team Leader
72510 Coyote Road
Pendleton, OR 97801

RE: Comment: Document: 2025-14846 (90 FR37458), Publication Number: 64157 Preliminary Draft Proposed Malheur, Umatilla and Wallowa-Whitman National Forest Land Management Plans

Dear Supervisor Watrud and Mr. Neuenschwander,

The Washington Native Plant Society (WNPS) requests that you examine our specific concerns raised during our review of the Draft Proposed National Forest Plans affecting future management directions on the Umatilla National Forest which includes lands within Walla Walla, Columbia, Garfield and Asotin Counties.

WNPS is a non-profit organization of 2,750 members statewide. For 49 years, our members have prioritized the appreciation, study, education, conservation and advocacy of both common and rare native plants and their habitats, for their intrinsic values and ecological functions. WNPS provides educational activities across the State of Washington that are open to the public.

Professional and citizen botanists at WNPS work to conserve not only native vascular and non-vascular plants, but also fungi, lichens and algae and their habitats. Protection from non-native and invasive species is a **critical** WNPS mission. Our goal is to ensure that current and future generations will experience and benefit from functional and biologically diverse natural environments in Washington State - those species and habitats that evolved in-place here for many thousands of years, stewarded by First Peoples, and encountered by European and Asian settlers.

SPECIES OF CONSERVATION CONCERN (SCC)
The Draft Proposed Forest Land Management Plan has gone to great efforts to include SCC identified by the Washington Natural Heritage Program **Thank You!** The Blue Mountains may be the smallest ecoregion of Washington State, but they "are perhaps the one most in need of comprehensive survey to document new species and identify additional occurrences of rare species."[1] This fact, in addition to our mission statements above, motivate our Plan comments.

[1] Fertig, Walter, et al. 2022. Conservation Status and Protection Needs of Priority Plant Species in the Blue Mountains Ecoregion. Prepared for US Fish and Wildlife Service, Region 1. Washington Natural Heritage Report Number 2022-6. WA Department of Natural Resources, Olympia, WA. Page 3 of 97

CHAPTER 4: MONITORING PROGRAM (pp. 126-134)

Table 30. Monitoring Program for Ecological Integrity (pp. 131-132) does not address monitoring to determine if the health status or integrity of native plants and communities are being maintained.

WNPS specifically requests that the forthcoming Draft Environmental Impact Statement (DEIS) **includes precise protocols and processes to support the following**:

(1) Routine monitoring of all G1/G2-S1/S2 plant SCC's.

(2) The addition of newly discovered plant species to the SCC List.

(3) The addition of location data on newly discovered populations of plants already on the SCC List or other rare and uncommon plants not known previously to be in the Forest Plan area, so that appropriate monitoring can be expanded.

(4) Precise protocols to implement Active Management responses when a SCC or any of its populations shows sign of decline due to the Land Management Plan's prescribed practices or other disturbances such as changes to weather and climate patterns.

In addition, WNPS requests that when surveying the rare plant categories above:

(1) That all plant species within given project survey area boundaries (whether the SCC is present or not) be recorded in the field and then entered into the USFS NRM database, as presently required in the Umatilla N.F. 1990 Planning Rule (Chapter 4, p.27).

(2) That botany survey tracks by USFS botanists and botany contractors be recorded, uploaded to ArcGIS, and buffered at 15 meters This buffering provides a reasonably accurate assessment of how much actual ground has been surveyed.

***These two requested actions related to monitoring will have the direct effect to ensure*:**

(1) That Desired Conditions for Species Diversity (P. 54, parts 01.-04.) can be upheld as stated in the Preliminary Plan in relation to "functionality of native ecological systems."

(2) That habitats for native plants are of "adequate quality" and that native plant community conditions support "diverse pollinator communities."

(3) That "habitat conditions are resilient and sustainable" in relation to changing climate and wildfire stressors.

(4) That datasets and survey track information will be recorded and available to researchers for analysis of all native and invasive plant trends on survey tracks and within SCC survey areas.

(5) That plant survey data collected will be robust enough to fully inform "proposed actions" within specific project area boundaries.

WNPS specifically requests that the sentence clause "The range of habitats for native and desired non-native species is of adequate quality…." (P. 54, part 02.), that the words ***"desired non-native"*** be expunged in the preparation of the DEIS as regards to plants. There is no such thing as a "desired" non-native plant when the goal is to create a Forest Plan with a cornerstone Desired Condition to maintain ecological integrity.

This will have the direct effect of ensuring that DEIS language and alternatives are clear and consistent on this point.

PRELIMINARY PLAN SECTIONS RELATED TO LIVESTOCK GRAZING

WNPS has adopted a "*Policy on grazing of domestic livestock on public lands*"[2] and understands that this can, in limited cases, be an appropriate land use practice if the site itself is appropriate but recognizes that there are **many potential harmful effects** to both native plants and plant communities as we strive towards ecological integrity into perpetuity. These harmful effects are well documented in the scientific literature (example: Kauffman. 2022[3]), and there is a constant theme to these effects:

(1) degradation by trampling of riparian zones and wetlands,
(2) altered and simplified vegetation structures and native plant community composition,
(3) overall reduced biological diversity,
(4) introduction of invasive, non-native plant species that once present, are almost impossible to eradicate in the disturbed grazing setting.

WNPS specifically requests that the phrase (Chapter 2, RNG Intro, p.81 & Desired Conditions, MA3A-RMA-DC, Part 05., p.112) "riparian wetland plant communities, including marshes and wet meadows," be completely removed from consideration as "suitable" forest rangeland forage habitat. This **should also include** perennially and seasonable wet meadows, Groundwater-Dependent Ecosystems (fens, seeps and "cryptic forest wetlands"[4]).

This will have at least two direct effects:

(1) maintaining the diversity of wet-loving vascular plants and bryophytes which in the plan footprint exist only in these habitats,
(2) ensure the hydrological stability of the tiny forest headwater streams and wetlands, in this seasonally dry forest, where water is truly "gold," and where formerly consistent precipitation regimes are changing, not just within those forested ecosystems, but for all ecosystems and stakeholders downstream.

OBJECTIVES (Chapter 2, FW-RNG-OBJ, part 01., p.82)

WNPS specifically requests that you abandon plans to "seek opportunities to expand" grazing activities by conversion of allotments from vacant to active.

This will have the direct effect of allowing the plant diversity and structure to continue to recover towards "ecological health" (Glossary Definition, p.136).

SECTIONS ON AQUATIC AND RIPARIAN CONSERVATION & STRATEGIES

WNPS **commends** the USFS commitment to the ongoing evolution of a "unified strategy" in its complex collaboration with the many stakeholders for the water resources that originate on the ridgetops of the Preliminary Forest Plan area (Appendix A, p.154). We generally agree with the "Proposed and Possible Actions" as detailed in Appendix B (p.174). **We thank you!**

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[2] Policy on grazing of domestic livestock on public lands". Washington Native Plant Society. This document is available for review at: https://www.wnps.org/advocacy-reports/public-lands-grazing-policy

[3] Kauffman, J. Boone, et al. 2022. Livestock Use in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation. Environmental Management. 69:1137-1152. Web Access: https://pmc.ncbi.nlm.nih.gov/articles/PMC9079022/pdf/267_2022_Article_1633.pdf

[4] Stewart, Anthony J., et al. 2024. Revealing the Hidden Carbon in Forested Wetland Soils. Nature Communications. 2024(15): 726.

WNPS specifically requests that in regard to determining Riparian Management Area widths (Chapter 3, Section MA 3A, Intro RMA's) that you do not elect to use Watershed Analysis to establish "narrower widths" and that in all cases possible, perform project-level refinements to establish wider than "default" plan widths.
This will have the direct effect of capturing the ecological and hydrological importance of "spheres of discharge"[5] and refers to those areas affected by groundwater emergence from springs, fens, **cryptic wetlands** and other groundwater-dependent ecosystems which are so precious in the Preliminary Plan area and support a unique concentration of plants and wildlife. This type of watershed analysis is ***imperative*** in this time of fluctuation of precipitation regimes that are starting to characterize the Blue Mountains and is a sensible approach to looking at all four categories of hydrological resources in the Plan area.

WNPS specifically requests that the USFS re-evaluate the plan for mechanical *"thinning in riparian stands to maintain or improve 'forest health'"* (Appendix B, Proposed and Possible Actions, Forested Vegetation, p.175). We understand that riparian stands have a natural frequency of fire similar to surrounding forests or uplands and that fuel build-ups in them can occur but thinning within these buffers can create more damage than cure. A 34 study meta-analysis[6] of forestry operations in riparian zones concluded that while responses to such harvesting can vary greatly from site to site, and that some studies presented certain biases, there was an overall theme of negative outcomes such as altered water temperature regimes, erosion, increased sediment fluxes, and negative effects on fish and benthic invertebrate populations.
Heeding this request will have the direct effect of supporting native plant diversity. These areas are habitat in the Blue Mountains Ecoregion for vulnerable OBL and FACW species that can exist/recover nowhere else in the Preliminary Plan area.

The Washington Native Plant Society thanks you for the opportunity to submit comments during the Blue Mountains Forest Planning process.

Sincerely,

Gail Sklar
WNPS President
and the WNPS Conservation Committee

[5] Springer, Abraham E. and Stevens, Lawrence E. 2008. Spheres of Discharge of Springs. Hydrogeology Journal. 17(1): 83-93.
[6] Richardson, John S. and Beraud, Salome. 2014. Effects of riparian harvest on streams: a meta-analysis. Journal of Applied Ecology. 51: 1712-1721.