



**ROCKY MOUNTAIN
ELK FOUNDATION**

October 6, 2025

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

Re: Blue Mountains Forest Plan Revision #64157

Dear Forest Plan Revision Team,

The Rocky Mountain Elk Foundation (RMEF) appreciates the opportunity to comment on the Blue Mountains National Forest Plan Revision-Scoping.

The mission of RMEF is to ensure the future of elk, other wildlife, their habitat, and our hunting heritage. RMEF's 225,000+ members include hunters, ranchers, guides, outfitters, other business owners, wildlife enthusiasts, and other conservationists who have both recreational and economic interests in hunting and enjoying elk on National Forest lands. Since 1984, RMEF has conserved and enhanced more than 9.1 million acres of North America's most vital habitat for elk and other wildlife. RMEF has conserved or enhanced more than 3.9 million acres across U.S. Forest Service (USFS) lands and opened or improved public access to over 366,000 acres. Together, the combined value of RMEF-USFS cooperative efforts totals more than \$408 million.

RMEF recognizes the Forest Plan Revision process under the 2012 planning rule is designed to emphasize restoration of natural resources to make our public lands more resilient to climate change, protect water resources, and improve overall forest health. Within that context, RMEF requests that the following recommendations be considered as the planning process proceeds.

General Comments:

Inclusion of Elk and Elk Habitat in Planning Efforts

Healthy, free-roaming elk herds contribute to and are intermingled with the social well-being, ecological integrity, cultural, and economic goals of the Forest. Elk and other big game serve 'distinct roles and contributions' to multiple user types on the Forest (wildlife viewing, hunting, etc.) and the Forest Plan plays a significant role in supporting future big game populations. RMEF recommends recognition of elk as an important species that provides economic and cultural value.

Coordination with State Wildlife Agencies

RMEF works closely with each state's wildlife agency. These agencies are our vital partners. In setting new management directions in Forest Plans, RMEF encourages coordination with each state wildlife agency - and that state agency goals for big game hunting are considered. RMEF

recommends including forest vegetation, timber, wildlife habitat, and recreation goals that help manage wildlife populations at levels meeting big game management plan objectives.

Connectivity

Big game habitat connectivity is increasingly threatened by habitat loss and degradation, as well as development activities. RMEF recommends Plan components that recognize the importance of big game movement corridors and include management direction for conserving corridors across National Forest and neighboring lands.

Science-based Management

RMEF appreciates USFS recognition and use of the best available science to guide the assessment. Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasions of weeds, lack of dependable water sources, and many others. RMEF often leans on the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat (Wisdom 2005). More recent research on ungulate migration (Kauffman et al. 2020, 2022), nutrition (Cook et al. 2013, Rowland et al. 2018), and elk security (Wisdom et al. 2018, Miller et al. 2020) continue to build on this foundation. RMEF recommends that recent research on the benefits of actively managed landscapes, impacts of high use recreation, wildlife connectivity, etc. continue to inform Plan components.

Comments Specific to the Plan Sections:

Wildland Fire

- RMEF supports a landscape-scale approach to increase the pace and scale of fuels reduction across the Blue Mountain National Forests. USFS lands have been at the forefront of severe wildfires over the past several years. The impacts of larger and more severe fires have been widespread, affecting wildlife habitat, recreational opportunity, and local economies. Given the multiple landowner framework of the project area, RMEF recommends including cross-boundary opportunities for active management and fuels reduction across private, state, and federal lands using tools such as good neighbor authority, shared stewardship, etc.

Invasive Species

- Noxious and invasive species are slowly replacing native forage for elk and other species and impacting forest resources. RMEF encourages the USFS to prioritize controlling and reducing invasive weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remain a critical component of effective weed management (Westbrooks 2004). Native plant communities provide the highest nutritional value for wildlife; RMEF encourages the use of native plant seed mixes in all restoration work.

Landscape Patterns and Connectivity

- RMEF generally supports the components in this section, particularly in working across landownership to improve connectivity. RMEF suggests including an Objective aimed at seeking opportunities for land acquisitions that improve connectivity.

- RMEF supports Objective FW-CON-OBJ-01, to remove fencing that is no longer needed and replace or modify existing fencing with wildlife friendly specifications. However, the numeric objectives for each forest are far too low. It currently suggests 15, 5 and 6 miles (per decade) for the Malheur, Umatilla and Wallowa-Whitman, respectively. RMEF volunteers regularly partner with the Forest Service on fencing projects, often removing/modifying more than 5 miles of fencing in a single day. The targets for each forest should be at a minimum, 5 miles/year. Please see RMEF's Wildlife-Friendly Fence Modification & Construction guide: <https://rmef.org/how-we- conserve/wildlife-fencing/>

Forested Vegetation

- The ecological integrity of forest ecosystems is dependent on maintaining vegetation diversity. RMEF supports a focus on a more heterogeneous forest structure, restoring more frequent fire, increased reforestation, and sustaining the existing late successional stage, all with an adaptive management framework given changing conditions and new information.
- RMEF is very supportive of active management on our public lands to benefit wildlife habitat and fire risk management. Executing active forest management techniques such as prescribed burns, thinning, and other treatments helps prevent severe wildfires and assists in long-term ecosystem resilience. In addition, managing natural ignitions can help achieve fuel and vegetation goals.
- Early seral forest provides important habitat for elk and other wildlife and is often achieved following disturbance. Decades of fire suppression have reduced early successional stages across USFS lands. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees that provide critical forage and cover for elk and other species.

Aspen, Woodland, Shrubland, Grassland, Meadow, other Non-forested Habitats

- Aspen stands represent a unique ecosystem, providing a variety of services. With an expectation of continued aspen decline, RMEF supports a focus on restoring prescribed fire treatments, removing conifers, and excluding herbivores in clones that are impaired or in decline, and revisiting current classification objectives.
- RMEF supports proposed efforts to remove invading conifers from sagebrush and grassland systems. However, while the Malheur Forest has a numeric objective for conifer removal in sagebrush, the Umatilla and Wallowa-Whitman have no objective. The Terrestrial Ecosystems Assessment indicates that at least 80% of sagebrush systems are within the “Juniper: low-mid cover” ecostate group - shrubland with a juniper encroachment threat. RMEF suggests setting numeric objectives for the two Forests.
- In addition, Objective 03 proposed to maintain existing meadows and grasslands by reducing conifer encroachment into them. However, the Plan proposed improvement on only 5 meadows per decade (for each forest). The Terrestrial Ecosystems Assessment indicates that more than half of the dry upland grasslands show existing conditions in Phase C or D (strongly or completely departed from reference conditions). With big game reliance on these systems for winter range, RMEF suggests increasing the numeric objectives significantly.

Species Diversity

- RMEF generally supports the Desired Conditions for wildlife proposed in the Plan. Several hundred wildlife species occur across the Blue Mountain National Forests, many that contribute significantly to ecosystem integrity and deliver ecosystem services (recreational, aesthetic, vegetation health, etc.). In addition to at-risk species, the Forest Plan is integral in helping ensure common species remain common. RMEF recommends consideration of fish and wildlife that are not identified as 'at risk' and their full integration in the Forest Plan Revision.
- With that, RMEF appreciates inclusion of Desired Condition 06. Forest vegetation and use support a broad distribution of elk on National Forest lands based on their seasonal needs, providing for healthy elk populations, and contributing to social and economic benefits.
- RMEF also appreciates inclusion of Management Approach 01. Consider vegetation management projects designed to maintain or restore elk habitat quality and quantity in a manner that encourages elk to remain on public lands and on sites that are capable of providing moderate or high nutrition potential.
- RMEF supports recognition of bighorn sheep as a potential species at risk and appreciates inclusion of plan components that decrease risk of disease spread: Desired Condition 07. Bighorn sheep herds are sustained at current or larger population size with minimal disease transfer from permitted domestic sheep and goats. Grasslands with nearby rocky escape areas provide native, high protein grass and forbs for bighorn sheep, as in Management Approach 06. The potential for spread of disease from domestic sheep and goats to bighorn sheep may be reduced by following a site-specific plan for sheep grazing allotments and special use permit areas for sheep and goats within 21.75 miles (35 km) of bighorn sheep herds. At minimum, plans would consider the best management practices recommended by Oregon Department of Fish & Wildlife (ODFW) and Washington Department of Fish & Wildlife (WDFW).

Recreation

- For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. RMEF strongly encourages inclusion of hunting, fishing, trapping, and shooting sports as contributing to local economies and the well-being and quality of life of forest land users. The Plan should provide for the continuation of these activities as a valid and vital component of the recreation spectrum. The Federal Lands Hunting, Fishing and Shooting Sports Roundtable Memorandum of Understanding between the U.S. Department of Agriculture, the U.S. Department of the Army, and the U.S. Department of the Interior (2011) develops and expands a framework of cooperation among the partners at all levels for planning and implementing mutually beneficial projects and activities related to hunting, fishing, trapping, and shooting sports conducted on federal land.
- With dramatic increases in public land use, RMEF recommends inclusion of past and recent research on the potential impacts of recreation to elk and other wildlife (e.g., Wisdom et al. 2018, Marion et al. 2020, Miller et al. 2020, Dertien et al. 2021, and others). Specifically, research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized (Wisdom et al. 2005) and non-motorized traffic on elk (Wisdom et al. 2018). RMEF supports a balanced approach

regarding the Recreation Opportunity Spectrum. Multi-use activities occur year-round and RMEF recommends that the USFS provide access for those seeking varied experiences (primitive and roaded). However, RMEF also recommends inclusion of Plan components that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and non-motorized traffic). Timing restrictions should be based on the best available science as well as site-specific factors (topography, available habitat, etc.).

Forest Products

- Given the importance of timber harvest for managing fuels and wildlife habitat, RMEF encourages creative solutions to maintain timber as a predominant factor in sustainable forest management, particularly given industry closures.
- To prevent unnecessary delays in project implementation, and to support landscape scale treatments, RMEF suggests removal of Standard 06: Openings created by the application of even-aged or two-aged regeneration harvest methods shall be limited to a maximum size of 40 acres. Where units larger than 40 acres are considered to help achieve ecological desired conditions, harvest openings larger than 40 acres may be permitted on an individual timber sale basis after 60 days public notice and review by the regional forester.

Rangelands, Forage, Livestock Grazing

- Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. RMEF encourages the USFS to employ grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife.

Landownership

- Identified as a significant barrier to maintaining hunting and angling participants, access to public land plays a critical role in ensuring the future of our hunting heritage (Eliason 2020). RMEF recommends consideration of public land access needs in USFS planning efforts, including close collaboration with ODFW and WDFW to create or maintain access points to USFS lands that are important for managing wildlife. In addition, RMEF recommends inclusion of relevant components within Executive Order 13443 on facilitation of hunting heritage and wildlife conservation (2007), the John D. Dingell, Jr. Conservation, Management, and Recreation Act (2019), and the Great American Outdoors Act (2020).
- Realty-Use Authorizations: RMEF recommends inclusion of Plan components that seek opportunities to improve road and trail rights-of-way for access to hunting, fishing, and other recreational opportunities.
- RMEF supports Plan components recognizing that acquisition or land ownership adjustments should improve management of USFS lands by consolidating land ownership, providing public access to public lands, and conserving and enhancing resources. Components should include land tenure goals and objectives to support

recreational priorities identified in the Dingell Act, utilizing section 4105 (Land and Water Conservation Fund).

- RMEF recommends inclusion of Plan components that seek opportunities to maintain or increase public land connectivity across USFS lands through land acquisitions, land transfers, etc., and prioritize such actions based on increasing public access, habitat connectivity, wildlife corridors, enhancement of recreational opportunities, etc.
- RMEF recommends that the Forest Plan Revision be intricately connected to travel management goals.

Designated Areas

- RMEF supports active management on our public lands to benefit wildlife habitat and manage fire risk. Wilderness (Wilderness Areas, Lands with Wilderness Characteristics, and Wilderness Study Areas) and other special designations often restrict active land management activities that are needed to ensure healthy, sustainable landscapes.
- Given the current condition of many public forests and rangelands, RMEF supports planning components that limit additional wilderness and other special designations that may limit management options.

Management Area 2H Starkey Experimental Forest and Range

- RMEF has been a long-term supporter for research on habitat relationships of elk and other early-seral wildlife in the Blue Mountains Ecoregion of northeast Oregon and southeast Washington. For over 40 years, RMEF has leaned on research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat. RMEF supports Plan components that maintain this management area as a priority.

Management Area 2I Murderer's Creek Wild Horse Territory

- RMEF supports continued management to keep wild horse populations from impacting big game species. However, RMEF suggests that the Desired Condition 02 be changed to a Guideline: Maintain the Murderers Creek wild horse herd within the determined appropriate management level and to meet big game population needs based on levels agreed upon between the Forest and ODFW.
- RMEF also suggests the USFS consider including guideline to minimize habitat deterioration caused by wild horses.

RMEF appreciates the opportunity to engage in the Blue Mountains planning process. RMEF desires continued involvement in this planning process and offers our technical assistance if needed.

Sincerely,



Karie Decker
Director of Wildlife & Habitat