Wallowa County Stockgrowers Association

[redacted]

Forest Supervisor Shaun McKinney
Wallowa-Whitman National Forest
1550 Dewey Ave Suite A
Baker City, OR 97814

October 2, 2025

Dear Shaun,

The Wallowa County Stockgrowers (Stockgrowers) are submitting our comments on the Preliminary Draft Proposed Blues Land Management Plans.

The Stockgrowers represents 66 members of the livestock industry in Wallowa County with many of these as USFS permittees. The Stockgrowers has tracked the development of the Blue Mountains Forest Plan Revision since the planning process began more than 20 years ago. We have provided comments many times on the various versions of the revisions.

We want to thank the United States Forest Service (USFS) for listening the local communities of the past few years and responding to feedback from the citizens who live in the Blue Mountains, and Wallowa County. The USFS lands greatly contribute to the livestock industries economic wellbeing as well as the individual ranches that rely on these lands to make a complete ranching operation.

The Stockgrowers are encouraged that the scoping document recognizes the value grazing in the ecosystem management. Specifically, the value of grazing in controlling fine fuels and controlling some of the invasive species. We also are particularly encouraged that this document recognizes that grazing provides sustainable forage that also maintains or moves watersheds toward ecological integrity and that grazing permitted livestock contribute socially, culturally, and economically to local ranching operations and communities.

The Stockgrowers has reviewed the document and do have some specific concerns as well as support for different sections. The specific input was developed in concert with the Wallowa County Natural Resources Advisory Committee and the County Board of Commissions. Therefore our specific comments are the same as the Wallowa County Board of Commissioners. We have attached a copy of these comments for clarity.

John Williams
President
Wallowa County Stockgrowers

The following are comments per specific points made in the preliminary draft plan.

PAGE 16

Ranchers are issued permits to graze cattle on specified allotments within the national forests during late spring, summer, and early fall.

Comment: Include winter grazing (Imnaha Canyon)

Comment: Ranching is one of Wallowa County's primary economic drivers and cultural identity.

"*According to the most recent Census of Agriculture, 1,008 Wallowa County producers owned 539 farms and ranches that operated on 520,213 acres, which is about a quarter of the total area of Wallowa County. Of that acreage, 18 percent is used to grow crops, 68 percent for pasture and rangeland, and 13 percent are woodlands.*" Wallowa County Natural Resource Management Plan, p. 29.

The Blue Mountains National Forests also have a long history of supplying timber and other forest products to meet local and national needs.

Comment: Timber harvest is hampered by a number of factors.

"*Changing market conditions, increased regulation, and special area designation on federal lands led to the collapse of the local timber industry starting in the early 1990s. Timber harvests from the Wallowa-Whitman National Forest fell from about 80 million board feet per year to less than 10 million from the 1990s through 2015.*" Wallowa County Natural Resource Management Plan, p. 30.

Residents and visitors alike seek out the national forests year-round for recreational opportunities.

Comment: Agriculture, timber harvest and recreation are vital to Wallowa County's socio-economic status.

"*Today agriculture and timber remain vital contributors to the local economy, as well as tourism and recreation - all of which depend on appropriate land use.*" Wallowa County Natural Resource Management
p. 5.

PAGE 17

The Blue Mountains National Forests provide a scenic backdrop to local communities. Several of the roads that provide access to the national forests are part of national, regional, and state scenic byways.

Comment: Forest Road 39/Hells Canyon Scenic Byway in Wallowa County has been in dangerously poor condition for more than 20 years. The road is scheduled for repair between the national forest boundary and Salt Creek Summit in 2027, but the county would like to see the Forest Service invest in regularly scheduled infrastructure upgrades and maintenance, especially along well-traveled routes like Forest Road 39/Hells Canyon Scenic Byway.

"Objective Acc-O1.1: Manage the transportation system to provide safe and efficient access for the movement of people and materials on public lands. Provide and manage facilities that permit access to a variety of settings, opportunities, and experiences, regardless of visitor's physical abilities." Wallowa County Natural Resource Management Plan, p. 71

PAGE 18

Monitoring Program

Comment: Wallowa County strongly encourages monitoring and adaptive management in all project planning and implementation.

"Identified management activities, when funding allows, are monitored and evaluated to determine whether goals and objectives were achieved and met the intent of the enabling laws. If an evaluation of monitoring data determines management activities should be adapted, the Wallowa County Natural Resources Advisory Committee recommends management adaptations to the Board of Commissioners.

If approved, the Commission would then recommend changes in public land management direction to the appropriate local, federal or state agency contact." Wallowa County Natural Resource Management Plan, p. 70

PAGE 24
Soils
01. Soil productivity and function contributes to the long-term resilience of ecosystems, including soil types that support unique native plant communities.
Comment: To maintain soils, disturbance activities should be modified with aggressive weed abatement and treatment; cleaning machinery before and after use in project area and treatment applied to disturbed site - chemical, mechanical, and or biological.
"Objective Nox-O1.1: Use all feasible means to eradicate, control, contain, or otherwise reduce negative impacts of noxious weeds." Wallowa County Natural Resource Management Plan, p. 86

Page 25
01. To reduce detrimental impacts to soil productivity and function, all ground based mechanical equipment should not operate on sustained steeper slopes. Based on site-specific analysis of soil, slope, and equipment, a higher or lower slope limitation may be authorized. Exceptions to this may include equipment designed for steep slopes that are determined appropriate to maintain soil function.
Comment: Systems such as tethered logging systems can operate on steep slopes without causing damage to soils while providing fiber to the market, fuels reduction and improved forest health. Soil standards and guidelines are to limit damage to soils, not to prohibit activity. We agree that permanent soil damage should be mitigated and steep slopes are particularly prone to sediment loading. *"Manage land to mimic the role of natural fire, build soil health, sequester and store carbon, and enhance moisture retention." Wallowa County Natural Resource Management Plan, p. 35*

PAGE 27
To maintain the intent of Community Protection Areas and protect values at risk, fuel reduction treatments should be prioritized over other standards and guidelines.
Comment: In a county with a high level of wildland urban interface and communities at risk of wildfire, and dedicated to updating its Community Wildfire Protection Plan every ten years, we support this statement.

Consider using fire as a management tool to restore ecosystem processes essential to maintaining resilient landscapes.
Comment: Keeping health and safety in mind, particularly smoke impact.

Consider partnering with counties, agencies, states, Tribes, local governments, and landowners
Comment: Add "Firewise Communities/organizers to maximize wildfire response capabilities and meet multiple land management objectives across ownership boundaries. Develop and keep Community Wildfire Protection Plans current.

Objectives (FW-WF-OBJ)
01. Hazardous fuel mitigation treatments (prescribed fire, natural fire, mechanical fuel, silvicultural) occur annually. Treatment includes initial entry and maintenance. See also FW-FOR-OBJ-01.
Malheur NF: 30,000 acres annually
Umatilla NF: 20,000 acres annually
Wallowa-Whitman NF: 20,000 acres annually
Comment: While this section focuses on wildfire, add mechanical treatment/timber harvest to prescribed fire recommendations and include in "silvicultural treatments".

Guidelines (FW-WF-GDL):
01. To create resilient, healthy ecosystems, wildland fire management strategies should promote desired vegetation conditions where wildland fire results in fire severities and intensities that are within the historical fire regimes.
Comment: add "when values at risk can be protected as well as the health and safety of the public and fire fighters."

PAGE 28
Forestland susceptibility to major insects and disease disturbances is heavily influenced by stand and landscape-level tree species composition, stand density, and stand structure, which can be affected by many factors such as timber harvest, grazing, extended drought, and fire suppression
Comment: Lack of management, including mechanical harvest and thinning, encourages conifer encroachment that compete with dry site/fire-adapted species.

Page 29
Invasive Species
Comment: This section should include chemical treatment of invasive annual grasses and use or aerial application. These objectives are not being met, nor is the Forest Service planning any meaningful way to combat this issue. There is nothing in this plan that gets to the real issue for managing noxious weeds, especially grasses.

Page 31
02. To prevent the introduction or spread of invasive species, consider restoring or revegetating sites disturbed by management activities, including sites treated specifically to control invasive plants, preferentially with native species. Where available native species or cultivars cannot prevent invasive species from dominating the landscape, non- invasive non-native plants may be used in treatments. See also FW-VEGNF DCs.
Comment: Strongly support the use of non-native seed when appropriate. In many cases the native seeds are so slow to develop and the native plants so slow to fully fill a site, that the site loses to the invasive plants. Many times the appropriate non-native species can compete and hold off the invasion of the annuals and other noxious weeds.
"The best management practices to fight annual invasive grasses are to manage native rangelands in the healthiest condition possible, leave as little open ground as possible, and seeding areas of disturbance with native or improved species dependent on goals. However, planting species that will best compete against these annuals need to be considered. The Wallowa County Invasive Annual Grasses Working Group is part of the process in deciding which practices to put in place for a specific landscape." Wallowa County Natural Resource Management Plan, p. 41

Page 33
02. To protect aquatic resources, hydroelectric and other water development authorizations should include requirements for in-stream flow regimes and habitat conditions that maintain or restore native fish and other desired aquatic species populations, riparian-dependent resources, favorable channel conditions, and aquatic connectivity.
Comment: This is the worst statement in the entire plan and could shut down agriculture. This needs to be removed or changed to allow management activities to continue and could include headgates for ditches, pump stations etc. which require in-stream flow regimes and are a back door way to establish an instream water right.

Page 34

06. Watersheds occupied by threatened or endangered aquatic species or their critical habitats are managed for high-quality habitat, functionally intact ecosystems, production of high-quality downstream water, and high watershed integrity and resilience to contribute towards their recovery and conservation.
Comment: This is another statement that could shut down management. All of Wallowa County's watersheds have threatened aquatic species. The national forests need to be managed for multiple-use, *including* these attributes.

Page 37
Desired Conditions (FW-FOR-DC)
01. Forested ecosystems have ecological integrity in their composition, structure, function, and connectivity. Forested vegetation reflects the natural range of variation while providing for wildlife habitat needs, existing or anticipated human use patterns, resiliency to future disturbances, and ecosystem services that may be desired (such as reduction of fire hazard or production of forest products).
Comment: We agree, ecosystem services are a necessary part of the desired condition. We appreciate guidance for 15,000-acre minimum project areas and we urge the Forest Service to plan projects larger than 15,000 acres that include cross-boundary treatments with private landowners, when opportunities are available.
<u>Wallowa County Natural Resource Management Plan, p. 75</u>
Objective For-O1: Follow the watershed approaches of the original Wallowa County - Nez Perce Tribe Salmon Habitat Recovery Plan for forest management as listed below.

Standard For-S1.1: This plan identifies 209,950 acres on the Wallowa Valley and Eagle Cap Ranger Districts and 39,000 acres on the Hells Canyon National Recreation Area as available, capable, and suitable for timber production. From these acres, timber harvests should occur on 12,448 acres with an estimated 40 million board feet being removed annually.
Standard For-S1.2: Silvicultural treatment activities shall maintain a viable and healthy ecosystem, referencing the historic range of variation in stand structure and seral stage for different biophysical environments, as well as future ranges dictated by changing environmental/climatic conditions.

Guideline For-G1.2.1: The tree density should be 40-50 percent shading (winter sun) at noon on 50 percent of all forested watersheds.
Guideline For-G1.2.2: Maintain appropriate average density of trees, e.g. 50 - 110 square feet per acre basal area on south facing slopes and ridges and 90-160 square feet per acre basal area on north facing slopes.
Guideline For-G1.2.3: Riparian management should be site-specific with the realization that the design of silvicultural treatments will be to enhance all the attributes of the riparian zone.
Guideline For-G1.2.4: Vary thinning to emphasize spatial heterogeneity and achieve patchy/clumpy tree distributions. Leave skips (untreated areas) and gaps (openings) in units following treatment. Leave clumps of trees. Embed denser forest patches within a treated landscape to provide for sustainable diverse wildlife habitat over time.
Guideline For-G1.2.5: Shift species composition from drought and fire intolerant species to drought and fire tolerant species.
Guideline For-G1.2.6: Reduce dwarf mistletoe's detrimental effects to the forest on a site-by-site basis.
Guideline For-G1.2.7: Place treatment units strategically on the landscape to moderate wildfire behavior and aid in control. Consider breaking up the fire continuum at a landscape scale.

Objective For-O2: Silvicultural treatments may include but not limited to: Uneven aged management, single tree selection, group selection, prescribed natural fire, management-prescribed fire, commercial thinning, pre-commercial thinning, salvage, sanitation cutting, and even-aged management: pre-commercial thinning, commercial thinning, seed tree, shelterwood preparatory, shelterwood seed, shelterwood removal, clear cut, and irregular shelterwood.

Standard For-S2.1: This silvicultural system, Uneven-Aged Management-Single Tree Selection, is intended to perpetuate uneven-aged stands composed of intermingled trees of differing ages, species, and sizes.

Guideline For-G2.1.1: Individually selected trees are removed to maintain a desired range of tree sizes over a prescribed distribution. Cyclic entries designed to control the structure and species composition and provide the openings necessary for establishment and growth of the continuously occurring regeneration are a function of the site quality and resource considerations.

Standard For-S2.2: The group selection variant of uneven-aged management is designed to facilitate the establishment of shade intolerant species, reduce damage to the residual stand, and lengthen the cyclic entry period.

Guideline For-G2.2.1: The opening created under the group selection prescription will often be no larger than one to two tree heights (as influenced by aspect and slope) so as not to lose the site protection afforded by the surrounding trees.

Guideline For-G2.2.2: Size, shape, and location of groups should be designed to achieve landscape character goals and scenic integrity objectives.

Page 48

Management Approach (FW-FOR-OLD-MAPR):

01. Consider forest management activities that are completed in a manner to set the landscape on a trajectory to meet desired conditions for structure, species composition, density, and landscape patterns and connectivity. This may necessitate a short-term loss of large or old trees in some areas for a long-term gain of meeting multiple desired conditions.

02. For each project proposing the removal of large trees or old trees, demonstrate through project analysis that over time management actions move the landscape towards desired conditions and that large and old trees are distributed in a manner and are of enough abundance to sustain old forest conditions and wildlife habitat through time.

Comment: This section is the most important section so far. Common sense rules here. Support managing forest for large or old trees but able to manage including removing them across the landscape.

Landscape Patterns and Connectivity

Introduction to the Landscape Patterns and Connectivity: “Connectivity is defined as ecological conditions that exist at several spatial and temporal scales that provide landscape linkages that permit the exchange of flow, sediments, and nutrients; the daily and seasonal movements of animals within home ranges; the dispersal and genetic interchange between populations; and the long distance range shifts in use of changing habitats.”

Comment: Most references to connectivity in the draft forest plan fail to provide a specific account of species needs necessary for effective management guidance. Without describing what is structurally complex forest, or what species depend on structurally complex forest, this guidance could easily be read to prohibit thinning that removes understory trees in dry forest stands that currently have multiple canopy layers (i.e., “structurally complex”), which would significantly undermine efforts to create forest resilience.

Page 52

Desired Conditions (FW-VEGNF-DC)

01. The composition, distribution, and abundance of vegetation within aspen, woodlands, shrublands, grasslands, and meadows are maintained, restored, or making progress toward an ecologically sustainable state.
Comment: Reaching site potential may be difficult, consider other wording. Other factors such as conifer encroachment, ungulate predation, and fire may limit sites from reaching "potential".
Comment: In areas currently dominated by invasive annual grasses, consider the introduction of cultivar grasses to at least allow the site to function.

PAGE 53
Management Approaches (FW-VEGNF-MAPR)
01. For restoration of non-forest vegetation, considerations might include ecological site potential, ecological integrity, and site-specific desired conditions based on the best available science.
Comment: Use Natural Resource Conservation Service (NRCS) ecological site descriptions, additional soil information, local plant association guides, and historical records as well as information from local landowners and land managers.
Forest management should be inclusive of forested sites, meadows, shrub-dominant landscapes. Restoration to functioning systems sometimes means removing trees encroaching on meadows or trees that outcompete species more resilient to the soil, slope, aspect, rainfall, and elevation. While regeneration in timber harvest sites is optimal, so is fuel reduction and forest health treatments like insect outbreak intervention, and tree spacing to reduce competition among trees for water and nutrients, creating a more resilient landscape.

03. Maintain existing meadows and grasslands by reducing conifer encroachment into them.
Malheur NF: 5 meadows per decade
Umatilla NF: 5 meadows per decade
Wallowa-Whitman NF: 5 meadows per decade
Comment: The Wallowa Whitman has many of these, consider increasing this objective to 10.

Page 53/54
03. Utilization of livestock (normally sheep, goats, or cattle) are appropriate tools for targeted grazing for vegetation management, such as fuels reduction or invasive plant control. Preliminary Draft Proposed Blue Mountain National Forests Land Management Plan Outputs are acres not limited by AUMs, and may be authorized with a special use or livestock use permit.
Comment: Consider use of non-native grass species in locations at high risk of invasion or already invaded sites by annual invasive grasses to fight in reducing the invasive population, increasing available forage for wildlife and livestock. It could also be used to manage the distribution of livestock away from sensitive or ecologically desirable sites.

Page 54
05. Beaver habitat conditions enable beaver populations to persist at levels and distribution sufficient to modify the aquatic and riparian ecosystems to increase water holding capacity, expand the wetted surface area, and increase the complexity and connectivity of the aquatic and riparian ecosystems, which provides resiliency to these ecosystems.
Comment: This insinuates beavers should be everywhere. It needs a qualifier like, “where appropriate and where not intrusive of neighboring landowners.”

Page 55
02. Replanting efforts shall use native species with genetically appropriate seed and plant material when available, except where native species cannot prevent invasive species from dominating the landscape, to maintain ecological integrity.
Comment: agree with using non-native species when necessary.

Page 56
06. To prevent bat, owl, and bird collision while dipping in livestock water troughs at night, wire strands or boards should not be used to support trough brace posts.
Comment: This bracing mechanism is needed to keep the troughs from warping, spilling, undercutting, and creating a large disturbance. What causes the greater damage? If we are restricted from using these materials and we know that troughs need to be braced, what alternatives are being suggested. When use is restricted, an economically viable alternative should be offered.

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.
Comment: We recommend treatment of invasive annual grasses monopolizing needed forage areas be a part of this plan.

Page 57
09. To maintain the presence of biological soil crusts, in areas with these crusts, management activities consider methods that minimize surface disturbance.
Comment: what methods?

Page 59
05. Forest and alpine habitat characterized by persistent snow cover and cooler temperatures provide wolverine denning and foraging opportunities. High elevation habitat and associated micro-climates provide refugia and habitat connectivity for species at risk in the face of changing temperature and precipitation patterns, and other emerging threats.
Comment: Why are we providing denning habitat for wolverines when they are considered an occasional visitor?

Species of Concern/Desired Condition
Page 60
04. To reduce disturbance to denning wolves, and the potential for livestock conflict, management activities within one mile of known, active (during same calendar year that use is documented) wolf den and rendezvous sites should implement appropriate site-specific restrictions
Comment: For this to happen, Oregon Department of Fish and Wildlife must communicate to producers and the Forest Service the denning locations and rendezvous sites in a timely manner and work cooperatively with both to use common sense in management options, not restrictions.

05. The potential for conflicts between domestic livestock and wolves may be reduced by considering the following best management practices recommended by ODFW and WDFW:
• Placement of salt and trailing of livestock away from denning areas.
• Herders stay with sheep.
• Known stray domestic sheep are retrieved promptly.
• Sick or injured livestock are removed from the allotment as soon as discovered.
• Livestock carcasses are removed from National Forest System lands, if that is not viable, coordinate with state agencies to seek other option(s).
Comment: Carcass removal is many times impractical. This is overkill. it should say remove if practicable, period.

Page 61
Management Approach (FW-SPRSK-MAPR):
Bighorn Sheep
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 following best management practices recommended by ODFW and WDFW:
• Maintain control of sheep or goats with use of herders and dogs.
• Individually mark domestic sheep in a manner that allows field identification of ownership while on National Forest System lands.
• Count domestic sheep as they go onto and off the permitted area to determine if any are missing. Report discrepancies to the District Ranger within 24 hours, and the permittee is to make a concerted effort to find missing sheep.
• Remove sick or injured sheep or goats from the allotment as soon as discovered.
• Manage recreational uses to consider health to bighorn sheep herds.
• Report bighorn sheep observed near active sheep allotments to the state wildlife agency.

Comment: Replace the distance in item number 6 from the 21.74 miles (35KM) to 5 miles.
Comment: Replace the section on page 61 under Management Approaches/Botanical discussing best management practices with the following:

Big Horn Sheep

These best management practices and communication protocols will allow management to be responsive to changing conditions including BHS population changes and movement, if they occur. Management practices and communication protocols will be discussed by the Forest Service and the permittee during annual meetings and will be utilized each year. Below is a summary of these management practices:

During the annual meeting where Annual Operating Instructions (AOI) are reviewed, the Forest Service and the permittee will review and discuss best management practices, permit terms and conditions, domestic sheep marking efforts, bighorn sheep identification, movement and observations, and communication protocols.

A BHS communication protocol will be discussed and revised annually during the AOI meeting, as needed.

The Forest Service will encourage the permittee to include employees (i.e. herder, camptender, and other "on-the-ground" employees), and an interpreter if needed in this meeting.

The Forest Service and Oregon Department of Fish and Wildlife will communicate throughout the grazing season for updates on any bighorn sheep sightings and changes in movement patterns within and around the Mud Creek allotment.

The permittee will notify the Forest Service by telephone or in person, at least 24 hours before entering and exiting the allotment.

The permittee will count all individual sheep (ewes, lambs, and rams) upon entering and exiting the allotment.

If during the full off-season count, domestic sheep are missing, the permittee will confer with the Forest Service to determine if any additional actions will be needed.

The permittee will maintain separation of domestic sheep from bighorn sheep by retaining herders with the band of domestic sheep while on the allotment.

The permittee shall mark domestic sheep in such a way as to ensure an accurate count and ownership.

Each sheepherder must carry communication equipment such as; cell phones, satellite phones, or hand held radios.

PAGE 62
…any species of plants were used as sources of food.
Comment: ARE used as sources of food.

PAGE 63
Management Approach (FW-TRI-MAPR):
01. Work with Tribes to develop a long-term strategy to secure treaty reserved resources, consistent with applicable federal laws and executive orders.
Comment: Clarify grazing requirements and treaty rights on U.S. Forest Service-managed open and unclaimed land.

PAGE 64
Management Approach (FW-LOCCOM-MAPR):
01. The Blue Mountains National Forests engage with county and local governments, partner organizations, and the public in a learning and collaborative environment. Consider communities with social and economic conditions that are more highly influenced by changes in forest policy and management decisions.
Comment: More than half of Wallowa County's land is publicly owned and managed by the U.S. Forest Service, thus highly influenced by forest policies and management decisions. We request open and frequent dialog, through our coordination status, with forest and district leadership.
Comment: Add - "The Forest Service maintains government-to-government relationships with counties containing the national forests of the Blue Mountains. Government-to-government relationships are vital for coordinating, protecting and managing ecological and economic resources vital to the local communities interests."

PAGE 76
Both the projected wood sale quantity and the projected timber sale quantity are limited by the projected fiscal capability and organizational capacity of each forest.
Comment: …as well as proximity to mills and timber market conditions.
PAGE 82
Grazing allotments provide sustainable forage that maintains or moves toward ecological integrity for grazing permitted livestock that contribute socially, culturally, and economically to local ranching operations and communities.
Comment: We strongly support this desired condition.

Vacant and forage reserve allotments may be analyzed and authorized using 36 CFR 220 regulations for grazing use to provide temporary permitted livestock grazing opportunities, especially when active allotments are rested for ecological needs.
Comment: Add - and find opportunities to reauthorize permanent term vacant and closed allotments.

Page 83
To promote recovery of desired vegetation conditions, unplanned burned areas should be evaluated to determine appropriate use and timing of livestock grazing re-entry, site preparation for future treatments, and fine fuels management.
Comment: Add - But not more than two growing seasons unless alternative grazing options are available.

To allow desirable plants time to recover following livestock grazing and to retain sufficient photosynthetic material for future growth and reproduction, grazing systems should be designed so that

plants are generally not grazed more than once a season, not grazed the same time every year, and not during the entire vegetative growth period (season-long grazing).
Comment: When listed fish and plant species are within the same pasture, often grazing is limited to the same time annually. Consider changes that would allow a rotational system to be in place, improving the overall ecological functioning, not just targeting practices to a few species, regardless of other impacts.

Page 83/84
05. To allow desirable plants time to recover following livestock grazing and to retain sufficient photosynthetic material for future growth and reproduction, grazing systems should be designed so that plants are generally not grazed more than once a season, not grazed the same time every year, and not during the entire vegetative growth period (season-long grazing).
Comment: These restrictions are not needed in many wet meadows or improved species situations. Need qualifier for grazing sensitive species.

Page 84
Introduction
The Forest Service provides and manages a wide range of non- recreation special use permits that authorize the occupancy and use of National Forest System lands. Authorizations may come through a permit, term permit, lease, or easement, which allows occupancy, use, rights of way, or other privileges of agency land. The authorization is granted for a specific use of the land for a specific period of time. Private individuals, organizations, companies, governmental entities, and educational institutions hold special use authorizations for wide variety of uses. Lands special uses include roads, dams, water systems, utility corridors, communication sites, and other private or commercial uses that cannot be accommodated off National Forest System
lands.
Comment: Other uses ought to be mentioned such as line camp occupancy for grazing allotments and many ag practices such as farming (land below a ditch that allows farmers to farm land in a logical manner.)

Page 92
Table 14: Blue Mountains National Forests Preliminary Administratively Recommended Wilderness - 0
Comment: Wallowa County recommends no more wilderness.

Standards (MA1B-RWA-STD):
Comment: ***Add words in bold:***
01. Proposed uses that compromise wilderness eligibility prior to congressional designation shall not be authorized (**subject to valid existing rights**) to preserve wilderness characteristics for which the areas were recommended. **Pre-existing authorized, non-conforming uses may continue so long as they do not impair the area's wilderness characteristics.**

PAGE 98
Nationally designated trails are well maintained and are upgraded where necessary to minimize resource damage while providing a safe, consistent surface.
Comment: Trails in the national forest system are poorly maintained and maintenance woefully underfunded.

Page 101, 102
Areas listed here as proposed were developed as part of Oregon Natural Area Plan of 2015 or other plans that are outside of this revision process. There are no newly proposed areas as part of this review.
Clear Creek Ridge 637 Proposed

Craig Mountain Lake 172 Proposed
Glacier Lake 102 Proposed
Haystack Rock 425 Designated
Horse Pasture Ridge 342 Designated
Indian Creek 1,003 Designated
Charles Grier Johnson Jr. (formerly Cougar Meadow) 130 Proposed 2
Lake Fork 223 Proposed
Mount Joseph 705 Proposed 2
Nebo 1,693 Proposed
Point Prominence 365 Proposed
Standley 742 Proposed
Gerald S. Strickler (formerly Government Meadow) 185 Designated
Sturgill 139 Proposed
Tenderfoot Basin 891 Proposed
Vance Knoll 192 Designated
West Razz Lake 47 Proposed
Total acres – Wallowa-Whitman National Forest 7,993
Comment: Need map to find out where these are to be able to comment effectively on them. Without the map we object to all of them.

PAGE 106
Hells Canyon Scenic Byway
Comment: Forest Road 39 is scheduled for repair in 2027 from where Wallowa County maintenance ends at a cattle guard five miles from the intersection with Highway 351, east five miles to Salt Creek Summit. This road is heavily traveled and dangerous due to its degraded condition and we urge the Forest Service to stay on schedule for the repairs.

PAGE 107
MA 2H Starkey Experimental Forest and Range (EXFOR) (Wallowa-Whitman National Forest only)
Comment: Keep Starkey funded!

PAGE 112
Livestock grazing of riparian vegetation is managed to retain sufficient plant cover, rooting depth and vegetative vigor to protect streambank and floodplain integrity against accelerated erosional processes and allow for appropriate deposition of overbank sediment.
Comment: The potential for the site needs to be realized with statements such as this.

02. Riparian Management Areas feature key processes and conditions that function consistent with local disturbance regimes, including slope stability and associated vegetative root strength, wood delivery to streams, input of leaf and organic matter to aquatic and terrestrial systems, solar shading, microclimate, and water quality.
Comment: What does microclimate mean in this instance. Remove it from the statement.

03. Riparian Management Areas provide stream habitat and ecological conditions (e.g., bank stability, substrate size, pool depths and frequencies, channel morphology, large wood size and frequency) capable of supporting self-sustaining populations of native and desired non-native aquatic and riparian-dependent plant and animal species, including species at risk. See also FW-SPDIV-DCs.
Comment: Not all category 4 streams should be expected to do this.

03. Aerial application of chemical retardant, foam, or other fire chemicals shall not be authorized within 300 feet (slope distance) of any waterway (including but not limited to perennial streams, intermittent

streams, lakes, ponds, identified springs, reservoirs, vernal pools, wetlands, and peatlands). This includes open water that may not be mapped as such on avoidance area maps and intermittent streams with surface water at the time of retardant use. Exceptions include cases where human life or public safety is threatened, and chemical retardant use could be reasonably expected to alleviate that threat.
Comment: Exception: when the devastation from the fire out ways the risk associated with the application. ie: when a risk of losing a manageable fire to a mass fire only because you don't apply the chemical

Page 113
Maintain or restore riparian management area habitat conditions through active vegetation and floodplain management, such as planting, seeding, silvicultural thinning, use of fire, floodplain reconnection, changes to livestock distribution, or invasives species removal.
Comment: Upland species management is essential for the longevity of the systems, especially sediment loads.

PAGE 114
06. To protect water, aquatic, and riparian resources, fill material, side-cast material, or organic debris should not be placed in RMAs except where needed to construct or replace stream crossings, or for stream restoration projects.
Comment: What about side casting of existing roads in RMA's that must be graded and snow plowed for access to private property or to utilize frozen ground harvest. Many times those activities cannot be done when frozen ground.

PAGE 116
To support long-term riparian function, consider silvicultural practices and timber harvest that reduce fuel loading and fire risk.
Comment: We support this statement.

PAGE 118
To support watershed resiliency, consider silvicultural practices and timber harvest that reduce fuel loading and fire risk.
Comment: We support this statement.

16. To protect water, aquatic, and riparian resources, new saleable mineral activities such as sand and gravel extraction should not be authorized within RMAs unless no alternatives exist or if the action(s) would not retard or prevent attainment of aquatic and riparian desired conditions.
Comment: Exception: when gravel and sand deposits, during high water, produce deep levels of deposit and removal would benefit the surrounding Riparian Management Area, private property, or structures, or when no-action would force the stream toward an undesirable location.

PAGE 119
02. Administrative facilities and adjacent lands are safe, efficient, cost-effective, and are maintained at a function and use level that meets management needs. Facilities meet all applicable health, safety, and accessibility standards. The level of development of administrative areas, adjacent lands, and infrastructure, such as water and power systems, is based on need and is appropriate to support the site or area.
03. Infrastructure design promotes employee, permit holder, and visitor safety and accessibility for all users. Facilities are maintained to provide a safe and suitable work and visitor environment. Grounds, landscaping, and natural vegetation are maintained in a safe condition free of hazards. The appearance is neat, orderly, and complementary to the surrounding landscape setting.
Comment: Keep properly maintained.

Monitoring
Comment: The monitoring program (Table 30. Monitoring Program for Ecological Integrity) should contain questions related to changes in vegetation in riparian management areas. Thinning may be appropriate in riparian management areas to improve aquatic function and reduce potential for stand replacing fire, but vegetation in the wake of these treatments should be monitored. Grazing impacts to riparian management areas should also be monitored.

Page 127
The first biennial monitoring evaluation report will be available to the public two years following publication of the LMP Record of Decision.
Comment: Two years should have passed before writing the report. We suggest moving this to year three.

Page 129
Species habitat conditions
Evaluations of plan components for species diversity and species at risk occur through monitoring their habitat (ecological conditions required for recovery and persistence of these species) see 36 CFR 219.12(a)(5)(#s 1 and 4). Monitoring species presence/ absence or population trends is not required to demonstrate that suitable habitat conditions and quantities are available for the species.
Comment: This is a major assumption of the Wallowa County Natural Resource Management Plan. We don't control the species population, We can only supply the hotel for them when they return! We support this method.

Page 156
Implementation of the ARCS is expected to substantially contribute to the recovery of federally listed fish, including anadromous salmon and trout, by increasing the quantity and quality of freshwater habitat.
Comment:" Substantial contribution" to the actual recovery of federally listed fish; is a vast overstatement as it pertains to implementation on the Wallowa Whitman Forest. Earlier common sense has been prevalent in the standard guides and goals, desired conditions, however, this is not in that vein. The anadromous fish has vast risks as it travels through the 8 dams, past the predators in the Columbia and then must survive the Russian and other over fishing and other risks. It may contribute to the fish habitat, but not the recovery of the population.
10-digit HUC/8-12 digit hydrologic units
Comment: These need to be defined with a map of an example size.

Page 157
Implementation of the ARCS is expected to substantially contribute to the recovery of federally listed fish, including anadromous salmon and trout, by increasing the quantity and quality of freshwater habitat (FEMAT 1993).
Comment: The Forest Service should go back and look at past conditions and improvements before assuming conditions and future needs.

Through identification of actions needed to avoid or minimize adverse effects and/or restore ecosystem conditions and processes, watershed analysis is also intended to enable protection and recovery of listed species and their habitats and to facilitate efficient project-level conferencing and consulting under section 7 of the Endangered Species Act. Similarly, it should enable protection and restoration of water quality and the full range of beneficial uses of water identified by the states and Tribes under the Clean Water Act.

Comment: Many limiting factors that put watersheds at risk are natural and not man made and cannot be "fixed" ie: water temperature that is naturally out of compliance as it exits wilderness areas. Again, over stating expectations.

Page 158

Watershed analyses will generally be conducted or updated prior to or as part of the process of developing watershed restoration action plans for priority watersheds.

Comment: This is all watersheds in Wallowa County as all have listed species.

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Key Watershed network and National Watershed Condition Framework process

Comment: Concerned these networks and frameworks are overly general and vague. Site specific and local data and information should be used first and foremost without relying on these national processes.

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These watersheds will likely serve as the next generation of refugia for fish and other aquatic-riparian biota and provide high-quality water in the future. Their selection should consider the extent of habitat degradation and the degree to which their natural diversity and ecological processes are retained (Reeves et al. 1995). Active restoration programs should consider and complement recovery plans for fish, water quality, and other riparian-dependent species.

Comment: Most actions don't recover fish. they recover fish habitat. we can create the hotel, the issues relative to fish are mostly downstream as in dams, ocean fishing, sea lions etc.

Page 171

Tracking Restoration Accomplishments

Implementation of restoration actions will be tracked for individual essential restoration projects, as identified in a watershed restoration action plan for each Watershed Condition Framework (WCF) priority watershed. These will be recorded in corporate databases. In addition, once all essential projects are completed, per the Watershed Condition Framework, the watershed is considered to have been improved or restored.

Comment: Watersheds are dynamic and always changing, watershed conditions move up and down due to human activities and natural conditions. To state that the watershed is considered to have been improved or restored is an unacceptable statement. Watersheds should always be available for restoration actions.

Page 174

Invasive species

Comment: also consider NEPA to allow for invasive annual grasses treatment using Indaziflam and aerial application of herbicides. These items are crucial to the fight of conserving our Forest lands.

Page 176

Social and Economic Sustainability

The public expects a diversity of uses from National Forest System lands. Social well-being contributes to resilience in national forests by fostering public use patterns and restoration strategies that help support human communities, livelihoods, cultures, and social values. Actions within the national forest contribute to outputs and opportunities that support community infrastructure and may include…

Comment: Include here the two purposes for creating the USFS: Make timber and water available to Dependent communities. Add a statement regarding supplying water for economic activities here.

Page 177

Transportation Infrastructure

Road actions serve to maintain and improve the national forest transportation system to enhance recreation opportunity, provide administrative access for resource management, and reduce negative impacts on ecosystems and natural and cultural resources. Actions may include:

Comment: Add: "general public to the national forest lands for many uses such as recreation, harvesting berries and mushrooms, cutting wood and other uses."

Recreation

Actions to support developed, dispersed, and backcountry recreation provide for a variety of recreational opportunities on the national forest. Possible recreation Actions may include the following:

Comment: Add - "Implement road maintenance to support all types of recreation on the National Forest lands."

Land Special Uses

The National Forest System lands program emphasizes land acquisitions that protect and enhance identified management resource needs. The program also pursues opportunities to consolidate land ownership, decrease management conflicts, increase management efficiencies, secure and mark property boundaries, and secure rights-of-way to meet administrative and public needs. Special use permits provide a wide range of recreation and non-recreation special use permits that authorize the occupancy and use of National Forest System lands. Lands and special use program actions may include:

Comment: Add - "Agricultural Special Use permits such as ditches, farming where property lines don't follow land form."

Page 182

Revised Land Management Plans must be designed to sustain or restore habitat for SCC populations and ensure, to the extent possible, that these species can remain on the landscape over the long term. Stated simply, Land Management Plans help us maintain conditions that provide SCCs with the habitat they need to persist in the Plan area.

Comment: This section is very worrisome. What mitigations based on these species might be proposed in the future? Why are common species such as Scouler's catchfly on this list?

Page 200

Wild and Scenic River Eligibility

Comment: It was not that long ago that we were dealing with the "River Democracy Act" in the state of Oregon. Proposing additional miles could mean increased mitigation measures in the future.