September 18, 2025

U.S. Department of Agriculture, USDA Forest Service
2025 Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests
Forest Supervisors Office, 236 pp
Re: Comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests pertaining to **Grazing**

Dear Sir:

Enclosed are my comments on the Preliminary Draft Proposed Land Management Plan for Malheur, Umatilla and Wallowa-Whitman National Forests (Draft Plan) pertaining to Grazing. I live in a rural area and my friends and neighbors raise cattle, and many depend on National Forest grazing allotments for their operations.

Readability
The Plain Writing Act of 2010, also known as Public Law 111-274, requires all federal agencies to use plain language in all new and revised documents intended for the public. This means writing in a clear, concise, and well-organized manner, making information easily understandable and usable by the public. The *Draft Plan* fails to meet the intent of this law.

Throughout the *Draft Plan,* we see hundreds of abbreviations. By the time I got to the Range section, I was seeing FW-WTR-STD, SPDIV, VEGNF, MA3A and MA4. The 1990 Forest Plan was clear and concise. That 1990 Plan had an introduction and a Desired Condition, and everything was written in plain language, and it was easy to understand.

These Draft Plan Component Codes, or abbreviations, which continue throughout the document, may mean something to the Bureaucrats, but they are distracting, and mean nothing to the ordinary reader. When these abbreviations mean something that is important to the document, each should be written out in English.

Another factor distracting from readability, is when the Draft Plan refers to documents like the *PACFISH/INFISH Biological Opinion*, or *Assessment Report of Ecological, Social, and Economic Conditions on the Blue Mountains National Forests (September 2024), National Forest Transportation Atlas*, or some other document. For readability, these documents should have pertinent portions included in the Plan. Even including these in an appendix doesn't work; see page 67 and 68 where it refers the reader to Appendix E. The reader should not be expected to

find these documents, and then read and understand them in context with the Draft Plan information.

Worse yet, the wild and scenic rivers Plan Component on page 94-96, fails to include the important information from Appendix G, but doesn't even alert the reader that appendix G exists. I only found it because I methodically paged through the entire confusing document.

In my efforts to read and understand other sections of the Draft Plan, I found on page 60-61 where there is a recommendation that sick or injured livestock, or dead carcasses be removed from the National Forest. The carcass is deep within the forest, weighs 1,000 pounds or more and all the roads are closed. Deer and elk die all the time and are left to rot or be eaten by carnivores and birds. Some of these recommendations in the Draft Plan are so dumb, the reader just focuses on these, and is distracted from understanding what the Plan Component section is attempting to say.

Consistency

The *Draft Plan* component descriptions are not at all consistent. This makes it very difficult to understand each section, and how they fit together, when each is so different. The Draft Plan states on page 22 that the Aquatic and Riparian Conservation Strategy requires plan components to be desired condition, objectives, standards and guidelines and suitability determinations. The Draft Plan does not comply with that ARCS requirement. In fact, in Chapter 2, the *Draft Plan* states that not every topic requires a full range of plan components.

And it just adds to the confusion. We see concepts which have Introduction, Desired Conditions and then these add Standards and Guideline, and some add Objectives to the list, and if that isn't enough, they then add Management Approach. The Management Approach section isn't even required, and as such should just be eliminated. This Management Approach section can be so detailed that an on the ground project manager would be left without the ability to make his/her own project decisions.

The Insect and Disease section has Desired Condition, Scale, but NO Standards, NO Objectives, NO Guidelines, but this one does have Management Approach, which isn't even necessary for the Plan. Again, there is simply no consistency.

In the Range section, beginning on page 81 of the Draft Plan, in the first paragraph, there is no description of the Desired Condition for rangelands. Instead, the reader is supposed to look up FW-VEGNF, FW-INV and FW-WTR-Dc. The Draft Plan goes on to explain that the Future Condition *"is not repeated here"*. This information should be presented in plain English right in this section. Cattle grazing on the forest is very important to the economy, custom and culture

of Baker and surrounding counties. 01-05 address vegetation and how cattle should be grazed. This section talks about grazing by all ungulates. Cattle should not have to be moved if elk are devastating the vegetation. 06 says grazing should move the forage toward *"ecological integrity "*. I had to look these words up. It means an ecosystem is whole, unimpaired, and able to function naturally. In other words, I read this to mean the desired condition is no more cattle. And, if this is what it means, the Draft Plan should just say this in plain English. That way, the reader can make comments concerning the importance of grazing to the forest and local communities.

Under 02, on page 83, what are the *Natural Resources Conservation Service Ecological Site Descriptions*? The Draft Plan must provide pertinent portions of this document in plain English, or delete this section entirely, On page 83, the Draft Plan states the Wallowa Whitman's plan is to authorize grazing of 81,673 Aums. The 1990 Forest Plan authorized 186,000 AUMs, and foresaw grazing in the year 2030 at 160,000 AUMs. Why have the AUMs been reduced so drastically?

As I looked through the Draft Plan, on page 115, under 12. In the Riparian Management section, I see a guideline that states that to reduce grazing effects within Riparian Management Areas cattle may have to be moved away from the stream. But in another section, I read that a riparian management area is 300 feet on either side of a fish stream. If the Forest Service is planning to make ranchers fence areas 300 feet from streams, this Draft Plan should just say that in plain English. I really am confused about what this guideline means. Also, it should be in the range section, not tucked away in the back of the Document.

In the Management Approach section, also tucked away in the back of the document, instead of in the range section, there is a statement that stubble height must be at least 10 inches to 15 inches at the greenline. This is dumb suggestion. Many forage species don't even grow that tall, nor do many species of grasses, such as rye grasses.

In conclusion, the Draft Plan should be rewritten in in a clear, concise, and well-organized manner. Everything pertaining to the range resource should be located in one section. Language should be easy to understand, abbreviations should be written out. If the Draft Plan is rewritten so it complies with the Plain Writing Act of 2010, the public will then be able to understand the what the Drat Plan is proposing and then we can make meaningful comments.

Sincerely,
Jan Alexander
Concerned Citizen and User of the National Forest