

FORMAL COMMENT ON INVASIVE ANNUAL GRASSES

Failure to Adequately Address Ventenata and Medusahead Rye in the Blue Mountains Forest Plan Revision

Submitted by	Loren Stout
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Regarding	Malheur, Umatilla, and Wallowa-Whitman National Forests

Principal Comment and Objection

I object to the Draft Blue Mountains Forest Plan's failure to specifically and adequately analyze, prevent, treat, and monitor the landscape-scale spread of ventenata (African wiregrass) and medusahead rye. These silica-accumulating invasive annual grasses are among the most destructive ecological stressors affecting low-elevation grasslands, scablands, winter range, and open forest communities in the Blue Mountains. General statements about controlling "invasive species" are not an adequate substitute for a baseline, effects analysis, measurable objectives, treatment priorities, monitoring triggers, and enforceable management direction for these two grasses.

The plan proposes or facilitates activities that can influence invasive-grass spread, including logging, prescribed fire, road use, grazing, equipment movement, and soil disturbance. Yet the plan does not clearly disclose the present distribution of ventenata and medusahead, project their expansion under each alternative, or establish measurable requirements for preventing their movement into uninvaded areas and restoring lands that have crossed into annual-grass dominance.

Murderers Creek Is a Documented Warning

The Murderers Creek Basin should be analyzed as a nearby, real-world example of what can happen when invasive annual grasses are recognized but research, treatment, grazing management, and cross-boundary restoration are delayed or frustrated. Substantial portions of this landscape have undergone conversion from native perennial grass and shrub communities to annual-grass dominance. Usable wildlife and livestock forage has declined, continuous fine fuels have increased, and the land's ecological carrying capacity and resilience have been severely reduced.

The Rail Ridge Fire intensified the crisis, but it did not create the underlying invasive-grass problem. In November 2024, federal agencies acknowledged a critical forage shortage and the risk that wild horses would starve. An emergency gather removed 410 horses, and sick, starving, and dying horses were still reported afterward. This emergency demonstrates the consequences of allowing forage capacity and native ecological function to deteriorate without an effective, coordinated response.

Local efforts were previously made to involve Oregon State University researchers in work that could help address ventenata. BLM did not allow the proposed researchers access to the necessary BLM lands in the Murderers Creek Basin. Court records from prior litigation also document that an ODFW employee represented to a research team that fish were not present, which caused the researchers not to study the area above the forks in Murderers Creek. The agencies should not rely on a lack of information where agency conduct helped create or perpetuate the data gap. The Forest Service should disclose how this history was considered and how the revised plan will ensure independent research access and meaningful cross-boundary coordination.

Current Grazing Timing Is Poorly Matched to the Invasive Grasses

The Forest Service has continued to withhold cattle from invaded low-elevation hills during spring, when ventenata and medusahead are still green and potentially palatable, and then allows livestock use after the annual grasses have cured. By that time, the silica-rich stems and mature seed heads are generally rejected by cattle and horses. The dried invasive material remains on the landscape as continuous fine fuel, while livestock may selectively graze the remaining desirable perennial plants.

Alternative 3's removal of the targeted-grazing objective is especially concerning. If that alternative is selected, the Forest Service should explain how it will reduce invasive annual-grass seed production and fine fuels at a meaningful landscape scale without eliminating a potentially useful adaptive-management tool.

The Steelhead Justification Requires Reach-Specific Evidence

The Forest Service has cited steelhead-habitat protection as a reason for restricting spring livestock use. Protection of occupied habitat and designated critical habitat is important, but the term "steelhead habitat" should not be used as a blanket explanation for excluding controlled grazing from every invasive-dominated upland within the watershed

Planning and Environmental-Review Deficiencies

The 2012 Planning Rule requires revised plans to include standards or guidelines that maintain or restore ecological integrity while taking stressors such as invasive species into account. It also calls for coordination with other governments and consideration of interrelated impacts. Murderers Creek spans federal and state management responsibilities and contains a large area of Malheur National Forest land. Its condition cannot reasonably be treated solely as a BLM or ODFW problem.

The final environmental analysis should take a hard look at how each alternative may contribute to, control, or fail to control the spread of ventenata and medusahead. It should analyze the combined effects of roads, vehicles, timber operations, prescribed fire, wildfire, livestock, feral horses, recreation, soil disturbance, delayed treatment, and climate-related changes. It should also disclose whether existing invasive-plant treatment decisions have sufficient authority, funding, staffing, herbicide coverage, restoration capacity, and monitoring to address the present scale of the problem.

Requested Changes and Specific Questions

1. Map and disclose the current distribution and condition of ventenata and medusahead separately across all three national forests, including infested, at-risk, and currently uninvaded areas.
2. Analyze how each plan alternative, including its expected logging, prescribed fire, grazing, road use, and other disturbance, is likely to affect the establishment and spread of each invasive grass.
3. Analyze Murderers Creek as a case study of foreseeable cumulative effects, loss of ecological carrying capacity, annual-grass conversion, fine-fuel accumulation, and failure of cross-boundary management.
4. Establish measurable prevention, treatment, restoration, and monitoring objectives, including acreage targets, response timelines, treatment-priority criteria, post-disturbance monitoring periods, and ecological thresholds that trigger corrective action.
5. Require equipment cleaning, weed-free seed and materials, early detection, rapid response, and multi-year monitoring for projects that disturb soil or move vehicles, livestock, or equipment through infested areas.
6. Authorize and fund independently monitored, short-duration targeted-grazing trials during the green, pre-seed-head stage, with riparian safeguards, native-plant utilization limits, off-stream water, herding, paired controls, and public reporting of results.
7. Explain why prior OSU research access was not allowed, disclose how the resulting scientific gap was considered, and establish a process that permits qualified independent researchers to conduct necessary cross-boundary studies.
8. Provide current, reach-specific fish data for the areas where steelhead protection is cited; distinguish occupied, unoccupied critical, and modeled potential habitat; and tailor grazing restrictions to demonstrated site-specific risks.
9. Explain why Alternative 3 removes the targeted-grazing objective and identify the equally effective, measurable method that would replace it for reducing annual-grass seed production and accumulated fine fuels.
10. Provide a direct written response to each issue and requested change in the final environmental impact statement and record of decision.

Conclusion

Murderers Creek shows that failure to act on ventenata and medusahead can end in landscape-scale loss of native vegetation, forage, fire resilience, and ecological carrying capacity. The Blue Mountains Forest Plan should not repeat that failure through broad aspirations with no measurable duty to act. The final plan should contain specific, enforceable, and scientifically monitored direction that addresses these invasive annual grasses before additional areas cross an ecological threshold that is extremely difficult and costly to reverse.

I request that this comment, the issues identified above, and the requested remedies be included in the administrative record. If the Forest Service does not adopt the requested changes, it should explain the factual, scientific, and legal basis for declining each request.

Authorities and Supporting Information

36 C.F.R. §§ 219.4 and 219.8 (coordination; sustainability and ecological integrity under the 2012 Planning Rule).

U.S. Forest Service, Fire Effects Information System, *Venttenata dubia* species review.

U.S. Forest Service research concerning ventenata invasion in Blue Mountains plant communities.

Oregon State University, phenology-based guidance for grazing invasive annual grasses and medusahead management.

BLM and U.S. Forest Service, November 2024 Murderers Creek emergency wild-horse gather announcement concerning critical forage shortage and starvation risk.