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Comments:

Please see the attached comment letter from the Blue Mountain Chapter of the Oregon Hunters Association.

Thank you.

Kevin

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Subject: Blue Mountains Forest Plan - Preliminary Draft Malheur, Umatilla, and Wallowa-Whitman National Forests Land Management Plans.

The Blue Mountain Chapter, Oregon Hunters Association (BM OHA) Chapter's mission is to protect Oregon's wildlife, habitat, and hunting heritage. Our Chapter participates in youth programs, public land service projects, planning projects that affect our public lands, wildlife resources, and our hunting heritage. We are proud partners with the Oregon Department of Fish and Wildlife (ODFW), the USDA Forest Service (FS) and the USDI Bureau of Land Management (BLM), our Land and Wildlife Management Agencies across northeastern Oregon.

Following is the Blue Mountain Chapter; Oregon Hunters Association's comments related to the Preliminary DRAFT Blue Mountain Forest Plan.

As the BMNFs Assessment Report indicates "Hunting and fishing remain important to Tribes, national forest visitors, and people who live throughout the region. The activities contribute to and diversify local economies, and the national forests of the Blue Mountains maintain a reputation as one of the best places to hunt big game in the Pacific Northwest." The assessment report also states "Hunting was the most popular activity" amongst all the recreational uses. Maintaining and improving this popular recreational activity should be a priority throughout the planning process.

Because of the economic, recreational, cultural and social value, we believe there should be additional emphasis on game species and hunting. You have identified hunting as the most popular activity on the three forests; the plan should reflect the importance of this activity and include desired conditions with identified objectives.

Hunting organizations demonstrated leadership and support for public lands during the latest budget

reconciliation act when there was a proposal to sell large amounts of Federal Estate. At the same time, most hunting organizations recognize that public land management can, should, and must improve. These are BM OHS's thoughts on how the three Forests can improve this draft plan and thus management of this part of the federal estate.

Under Chapter 2 - Forest-Wide Plan Components - there should be desired conditions with identified objectives for hunting and the principal game species. This should include at least BHS, Rocky Mountain Goat, elk, and mule deer.

There needs to be discussion in the section on Social and Economic Sustainability, in Chapter 2 on the importance of hunting in the BMNFs as a significant economic driver for our local economies. Especially for our smaller, more remote communities. This discussion should include cultural and social needs and desires.

The draft plan as written states: Social and Economic Characteristics: (page 17 of plan doc). An abundance and variety of wildlife species may be seen, including bald eagles in the winter and bighorn sheep in the summer and fall.

* We do not believe this demonstrates the importance of hunting and wildlife viewing as two of the most popular activities in the BMNFs. It says nothing of the economic, cultural and social importance of hunting and the associated wildlife species to Tribes, to our public and our communities.

* There should be standards and guidelines on how you are going to balance the needs of the hunting community (your largest recreational user group) with the desires and needs of other interests.

* The plan should include standards and guidelines to maintain or improve these valuable economic, cultural and social resources. Examples of this should include management for security, management of risk from disease, managing impacts, and habitat.

Blue Mountain Chapter, OHA's proposals related to elk management, are much the same as we shared in earlier opportunities for input. We have yet to see much of our input, or those of other hunter, conservationist organizations reflected in the draft plan.

There is an increasing/continuing problem of too many elk occupying nearby private property causing hardship for livestock and agricultural producers. Elk distribution has been a very difficult and controversial issue. Elk use over time has shifted towards private lands and away from public lands. This has led to reduced hunter opportunity and satisfaction on public lands and increased problems of elk damage on private lands.

Elk redistribution from private back onto public land is a huge issue. Appropriate management of the public lands is key to making this happen. BM OHA believes that habitat enhancements coupled with increased security (access management) will begin to change this dynamic and be a first step in maintaining elk distribution on public lands. BM OHA supports continued engagement of partners including ODFW, BLM, Tribes, sportsmen/recreation organizations, and adjacent private landowners to look for effective results. There will continue to be a need to work with and on private lands to redistribute elk back to public lands (aggressive hazing, hunting, habitat, security, and forage improvements, etc.).

We believe the National Forests have a role in changing this elk distribution shift by creating favorable forage through logging, thinning and burning, as well as by managing open road densities to improve elk security.

During most years many of the elk in the blue mountains leave the public lands before first season elk season ends (October). ODFW and OHA have been working with the Forest Service to keep elk on public lands and accessible to the public hunters and wildlife viewers by utilizing salt sites in the spring to move elk onto public lands from wintering areas, trying to reduce road densities adjacent to private property and encouraging controlled burns to improve forage.

Elk generally are disturbed by roads within a half mile of their location and closing strategic roads would help create more elk security and assist in maintaining elk on the National Forest for a longer period. BM OHA recommends that the Forest Service (FS) create areas of elk security that also includes good forage so that the elk do not have to leave the security areas to find high value forage. The juxtaposition of thinning, burning and road closures need to be planned so that elk have the best opportunity to fully utilize the resources available in the project area. Creating high quality forage in areas with little elk security would provide less benefit to the elk herd than having high quality forage in an area where elk are secure.

Elk security will be improved by closing or seasonally closing open motorized access. Local research in the Blue Mountains indicate that elk select for areas with increasing distance from open motorized routes, with an average minimum distance of ½ mile (Hillis et al. 1991, Johnson et al. 2005a, Rowland et al. 2000, Rowland et al. 2004). Decreasing disturbance will allow elk to utilize available forage and cover during calving and winter seasons, improve distribution across all seasonal ranges and encourage elk to remain on public lands. We recommend seasonal closures begin before the first hunting season in the fall (archery season) and do not end until the end of elk calving and good green up on the public lands (spring).

BM OHA supports the need to maintain hiding and security cover, while also applying silvicultural actions that stimulate big game forage. We strongly support active forest management and are supportive of timber harvest, thinning, and prescribed burning.

The existing literature does suggest that high quality forage, specifically predictable high quality native forage, can encourage migration off agriculture lands, particularly with the use of fire, timber harvest and livestock grazing strategies to improve forage (Baker et. al. 2019).

We continue to encourage the FS to partner with the Bureau of Land Management (BLM) and ODFW on adjacent and nearby federal and State lands as to adequately deal with the ongoing issues of elk on private lands lends the larger landscape to address. Including exploring the opportunity to utilize livestock grazing and prescribed fire to improve forage resources for elk. Intercepting and holding elk on public lands is to the benefit of both the members of the public and the adjacent private landowners and exploring all potential options and landscapes to do so is recommended. We feel that these issues need to be addressed both on public and private lands.

Elk redistribution from private back onto public land is a huge issue in the Blue Mountains and across the West and managing the public land is key to making this happen. BM OHA believe that habitat enhancements coupled with increased security (motorized access reductions) will begin to change this dynamic and be a first step in maintaining elk distribution on the public lands. BM OHA supports continued engagement of partner agencies including ODFW, BLM, Tribes, sportsmen/recreation organizations, and adjacent private landowners to look to yield effective results. There will continue to be a need to work with and on the private lands and with key partners to redistribute, both the migratory and now some localized, elk back to public lands (aggressive hazing, hunting, habitat, security, and forage improvements, etc.). We suggest a monitoring plan be developed to determine the effectiveness of the different strategies on elk movements, so effective strategies can be shared and replicated.

Mule Deer -

Mule deer have struggled across the Blue Mountains and maintaining high quality forage, security, and overstory cover is important.

Mule Deer nutritional benefits are primarily found on summer ranges but there needs to be more emphasis and recommendations in the plan for the management of winter ranges. Most permanent and/or long-term threats to mule deer habitats will likely occur in shrub habitats and winter range. Direct loss of habitat quantity can occur through landscape development and indirect loss of habitat quality through fire and non-native invasive vegetation. Wildfire and prescribed fire, used without a focus on mule deer habitat needs can cause the loss of non-fire tolerant shrubs and the establishment of non-native annual grasses. The plan needs to include discussion on the importance of shrub habitats and winter range and include strategies for managing these landscapes.

Fire is often not beneficial in the shrub steppe; dominant shrub species such as sagebrush and bitterbrush are fire intolerant and can take a very long time to get back to 10% or more shrub component following fires and prescribed burning. Fawning habitat often occurs in the bottoms and draws, if burned can take many years to replace and this can be some of the best fawning habitats.

State management objectives (MOs) are a critical component in effectively managing elk and mule deer and their habitat.

Bighorn Sheep -

The most significant threat facing bighorn sheep in the Blue Mountains of Oregon and Washington, Hells Canyon in Idaho, and throughout the West is disease transmission from contact with domestic sheep and goats. The effects on bighorn populations can take several forms, including acute all-age die-off events, high mortality rates in lambs for decades, and chronic or sporadic adult mortality. Pathogens associated with the respiratory disease complex are spread among interconnected bighorn populations over a period of years, resulting in mortality in multiple populations over time. Overall, this will chronically limit bighorn numbers and distribution in areas where respiratory disease occurs. Consequently disease, especially recurring events, will depress bighorn populations and/or eventually lead to local extinction.

There are lesser impacts to bighorn sheep habitat from invasive weed invasion, forest succession and climate change. These need to be addressed and managed as well.

You should include an analysis related to migration corridors and the potential for genetic exchange between bighorn sheep herds. These are potential issues that should be explored in some detail to assure long-term viability.

We are very glad to see that Bighorn Sheep have been identified as a Species of Conservation Concern (SCC) on all three Blue Mountain Forests (Umatilla, Wallowa-Whitman, and Malheur). We are interested in the monitoring component of the planning rule for the SCC list. Monitoring BHS population dynamics is important to ensure that adaptive and proactive measures are taken immediately if species population viability is threatened. We do not expect the USFS to actively monitor populations, however, we propose that the Blues Forests specify the use of annually collected ODFW data to fulfill the monitoring requirement of the 2012 Planning Rule.

Multiple bighorn sheep populations in the Hells Canyon area, the Wallowa's and throughout the Blue Mountains experienced high rates of mortality due to pneumonia outbreaks from the 1980s, through the 2000s. The origin of these outbreaks has been documented as domestic sheep and/or goat strains of *Mycoplasma ovipneumonia* (Movi). Many of these populations have not recovered, and are currently limited by low lamb survival, primarily due to persistent pneumonia caused mortality. Pathogen transmission to bighorn sheep is controlled by maintaining separation between bighorn sheep and domestic sheep and/or goats.

Regarding domestic/wild sheep conflicts, Forest Service (FS) policy and direction should be to: (1) achieve effective spatial and temporal separation of authorized domestic sheep and/or goats from wild sheep, and (2) minimize risk of contact between the species. We believe that well designed Risk

Assessments (using the updated Risk of Contact Model that the FS, BLM, and Western Association of Fish and Wildlife Agencies have invested in) coupled with wild and domestic sheep/goat monitoring are critical to evaluate effectiveness of grazing management, especially when it comes to maintaining and restoring wild sheep populations.

Regarding domestic/wild sheep conflicts, policy and direction should be to: (1) achieve effective separation of domestic sheep and/or goats from wild sheep, and (2) minimize risk of contact between the species.

We fully respect the access sought by those that use domestic goats as pack goats. However, it is simply not worth the risk to bighorn sheep populations. The States of Washington and Oregon have banned the use of pack goats on wildlife management areas where there is a risk to wild sheep, the Federal agencies should do the same. There is a place for pack goats but NOT near bighorn sheep! It only takes one incident to have catastrophic consequences that could take decades to overcome.

The plan should address impacts to wildlife habitat from invasive plants, forest succession, increased recreational uses and climate change.

* Habitat, wildlife, and recreational management are all important elements that should be focal points. Healthy abundant wildlife populations can only be achieved through good forest, range and recreation management practices. Invasive nonnative plants can replace native vegetation, rendering foraging areas unusable. Fire can rejuvenate native forage and reduce conifer encroachment, which increases connectivity between source habitats. Fires can increase security by reducing trees or shrubs cover increasing sight distances.

* We support silvicultural activities that enhance the unique habitats of aspen stands, wet meadows, and sagebrush steppe habitat types. With respect to aspen enhancement, we suggest that all conifers within aspen groves be removed regardless of DBH. We support revegetating all soil disturbed by operations (i.e., skid trails, landings, decommissioned roads, etc.) by seeding with grasses and forbs which will improve forage for big game and livestock, while reducing sedimentation of streams.

To ensure long-term viability of wildlife, the plan should include an analysis related to identifying and maintaining migration corridors.

Chapter 3 - Management Area Components -

It is unfortunate that the Draft Plan discusses in detail the importance of some uses but does little to discuss interests and management for the largest user group in the Blue Mountains, the hunting community. This is a user group that is a huge economic driver, users that financially and actively reinvest in the BMNFs resources.

Landscape vegetation treatments and large fires have the potential to change wildlife habitat or increase connectivity between existing habitats. This could allow wildlife to utilize new or additional areas. These should be identified and adjustments made as needed.

We thank you for the opportunity to comment on the three Blue Mountain National Forest's Forest Plan Revision process and we look forward to continued participation.

Respectfully,

Kevin Martin
President, Blue Mountain Chapter, Oregon Hunters Association
Cc Mike Totey, Tyler Dungannon

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