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Title:

Comments: September 24, 2025
Office of the Umatilla National Forest Supervisor
Attn: Blue Mountains Forest Plan Revision
72510 Coyote Road
Pendleton, OR 97801
Dear Blue Mountain Forest Plan Revision Team: On behalf of the Oregon Cattlemen's Association and Oregon Public Lands Council, the following concerns are submitted for the Preliminary Draft Proposed Malheur, Umatilla, and Wallowa-Whitman National Forest Land Management Plans, referred to throughout this document as "the Plan".

Invasive Annual Species: In this document, the Plan discusses the desire to improve ecological condition; including those of the grasslands, (page 52), encourage species diversity (page 54), promote use of vegetation on Forest areas by native species such as elk (page 56), provide habitat for butterflies and bees (page 58), and finally ensure habitat for Spalding's catchfly (page 59). Further, there is also a desire for rangelands to ecologically recover (page 85) and maintain integrity (page 86). The "elephant in the room" with all of these desires, standard, and objectives, is the lack of treatment of invasive annual grasses. Within the "Invasive Species" section of the document, the Plan states: The intent of the invasive species components in this plan are to emphasize that all management activities authorized by the Forest Service are designed to minimize or eliminate establishment or spread of invasive species on National Forest System lands, or to adjacent areas. - page 29, Invasive Species.

Invasive annual grasses such as cheatgrass, medusahead rye, and Ventenata are absent or are present in trace amounts. Invasive annual grass growth after wildfire is controlled. - page 29, desired condition, Invasive Species.

Actions intended to prevent and respond to invasive plants is dynamic and designed in a manner that allows for an adaptive management approach. - page 31, management approach, invasive Species.

As the Plan expresses throughout its pages, the Forests want to improve in condition and minimize invasive annual grasses. The Desired Condition section of this document clearly explains that treatment is anticipated, however, it does not explicitly state that new tools such as use of Indaziflam, (Rejuvra), or aerial treatment are being considered, and/or will be possible to implement after this plan is signed. We are concerned that without this straight-forward language, this section may be misleading and cause unnecessary tension when NEPA for individual invasive annual grass projects are prepared. The Oregon Cattlemen's Association would like to see transparent language that allows for the Forest Service to use herbicides such as Indaziflam or the family of chemicals associated with Indaziflam, to treat the invasive annual grass issue that threatens all these Forests. Further, we request language that includes the use of aerial application of herbicides. Unfortunately, many of the areas of concern and areas that are already infested are too rugged to treat by other means.

Species of Conservation Concern: Species of Conservation Concern have been identified. According to the CFR rules as written within the Plan, these species of conservation concern are: "A species, other than a federally recognized threatened, endangered, proposed or candidate species, that is known to occur in the plan area and for which the regional forester has determined that the best available scientific information indicates substantial concern about the species' capability to persist over the long-term in the plan area" (36 CFR 219.9). Page 182

The Plan gives extensive lists of species. The Plan does not include any discussion about potential future mitigation that may have impacts on livestock grazing or other multiple uses with this list of species. This is very concerning to the Oregon Cattlemen's Association. Further, because mitigation is not addressed in this document, the FS is opening an opportunity for future litigation by interest groups on behalf of these species. Some of these species are fairly common on the landscapes and/or have not been thoroughly inventoried prior to being put on this list. We request that the Forest Service includes more information about the impact of this list on other multiple uses on the Forests. Also, we request that the Forest Service collaborate with other local specialists, who work outside of the Forest service, such as range specialists, foresters, and ecologists about these species before putting them on this list.

Wild and Scenic Designations: Prior to this plan, 157.8 miles of stream have already been designated on the three forests. The Plan has identified another 68.1 miles that are eligible for wild and scenic designation. Most of these miles are on the Wallowa-Whitman, which already has over 90 miles designated. At this time, Oregon Cattlemen's Association requests that no further designations be proposed or passed.

Trough Management: "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." Page 56 - Species Diversity Guideline. If a trough is not properly braced, the trough will warp and begin leaking water. The water then softens the ground and the area around the trough begins to erode. With livestock use, the saturated soil areas begin to undermine the trough. Eventually, the system fails, causing a high amount of damage to the surrounding landscape and a lack of off-site water for livestock. By properly bracing a trough, this damage can be prevented. The Plan is recommending that the troughs not be properly braced. Does the Forest Service have an alternative recommended way to brace these troughs to prevent damage? If not, we request that the trough management guideline be removed.

Use of Non-native Seed: 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. - Page 55, Standard Aspen, Woodland, Shrubland, Grassland, Meadow, other Non-forested Habitats (VEGNF)

The Oregon Cattlemen's Association is grateful for this standard as many areas have crossed a threshold and will not recover from disturbance naturally or with native species. This tool, in time, will allow these sites to have the opportunity to ecologically function.

Riparian Area Management: 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. - Page 112

The potential of a site or riparian reach needs to be understood with a statement such as this one. This will ensure that misrepresentation of livestock use in historically degraded riparian systems is avoided. Further, we appreciate that the Plan is looking more in-depth into these concerns as written: Not all numeric values may apply to a particular site if the site is not ecologically capable of producing vegetation that the indicator could be applied to, such as sites with short grasses or grass-like plants. - Page 116, Management Approach in Riparian Area Management.

Riparian Management: Within the Rangelands, Forage, Livestock Grazing section of the Plan, the following guideline is written: 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). - Page 83

For many pastures, especially those with anadromous fish, grazing is limited to the same time annually, which is typically during the hot season when fish are not spawning. This, in turn, creates an issue where the livestock loaf in the riparian areas (due to the hot and dry summers), avoiding upland dry feed, and focusing on protein-rich riparian species. This then increases the use of these riparian areas, causing increased potential for habitat disturbance. If adaptive management could be used to allow rotational grazing, it would be beneficial to the rangeland resources and the riparian systems. Further, because the populations of the listed fish species will not be detrimentally impacted by use during spawning season, consultation should be done to allow a wider breadth of grazing times. A rotational system would allow for the improvement of the overall ecological function, not just targeting practices to a few species, regardless of other impacts. Another matter that we would like you to consider is to allow for the creation of additional ponds and/or other off-site water sources where riparian habitat is a concern and use is limited due to fish bearing streams.

Bighorn Sheep: Within the Management Approach portion of the Plan, there is language pertaining to the management of bighorn sheep, page 61. In the 2010 Wallowa-Whitman Westside EIS, a management protocol was already decided upon and agreed to by all the parties involved. The Oregon Cattlemen's Association would like to see this protocol stay in place. Below is an excerpt from the Westside ROD that explains this portion of the decision.

- * 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, camp tender, and other "on-the-ground" employees), and an interpreter if needed in this meeting.
- * The Forest Service and the ODFW biologists 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
- * handheld radios.

Also within the Plan is the following excerpt: 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. When assessing the location of sheep and goats in Wallowa County on private lands, there is no way to achieve this 21.75 mile buffer. Further, by following this protocol, it would effectively remove the last operating sheep allotments. A five to seven mile buffer was used within the Westside EIS. This buffer along with the protocol described above has worked well for the last 15 years at eliminating co-mingling of these species on Federal lands. Oregon Cattlemen's Association would like for this 21.75 mile buffer to be reconsidered.

Wilderness Evaluation: At the time of the draft plan, there was not any Preliminary Administratively Recommended Wilderness Area proposed. If this proposed action were to change, the Oregon Cattlemen's Association requests to be notified. Further, we appreciate that no further areas are being considered as these designations can make it difficult for permittees to manage livestock. Thank you for your consideration of these concerns. Please reach out if you have any comments, suggestions, or questions. As always, we are happy to work with you and always hope to build relationships that can improve the Forest and continue to allow for Livestock grazing on National Forests.

Respectfully, Matt McElligott, President Oregon Cattlemen's Association
Kelly Birkmaier, Co-Chair Oregon Public Lands Council