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Organization:

Title:

Comments: October 2, 2025

Eric Watrud

Forest Supervisor, Umatilla National Forest

72510 Coyote Road Pendleton, OR 97801

Subject: Blue Mountain Forest Plan, Bighorn Provision

Dear Eric Watrud,

As the owner of Krebs Livestock, I hold the term grazing permit for the North end Sheep Allotment. After reviewing the Blue Mountain Forest Plan, specifically, the "Bighorn Sheep" section on page 61 of the Blue Mountain Forest Plan, I interpret the plan to mean the following:- Sheep Allotments located within the 35km of a known bighorn herd as determined by ODFW must have a "site-specific" contact reduction plan. No allotments will be closed.- Adhering to a "site-specific" will ensure continued use of the permitted allotment. In addition to maintaining the current presence in the allotment, I further ask consideration be given to opening allotment acres that were closed in the past. With technological advances, holding true to the mission of "multiuse resource management" is possible while simultaneously allowing for change. The original (10 mile) setbacks may have made sense in 1990 when the plan was last drafted, but today they seem extreme. As tools like (Virtual Fence, poly-woven wire night pens, UHF ear tags, satellite communications, AI capabilities, and Geo-PDF) become available and deployed, the risk is being continually reduced. This prompts the question: Can the distance of separation be reduced? Does the current "risk of contact model" consider wolves? Wolves are incredible land managers and drastically change animal behavior as numerous studies across various ecosystems have shown. Although I have not seen a report describing the interactions of wolves and bighorns, I would suspect the migration behavior and habitat use has been changing for them as well. Examining the current patterns would potentially allow for expansion of acres available to domestic sheep producers (assuming "site-specific" plans are drafted and adhered to). New plans may reflect a selection of tools listed in the previous paragraph. One of the tools which I am personally using on the landscape is night penning. This practice allows for multiple inventory checks daily. Wolves are the driver of these control measures, but the benefit is going towards reduction of contact with bighorns. I sent a letter in March 2019 (a copy of which should be in my file) asking for participation in expanding research and technology. Although USFS and other members choose not to actively participate I pushed forward, built a research team out of Colorado State University that includes Dr. Temple Grandin. Our means of controlling stray and missing livestock are working. The Blue Mountain Plan is provided through an App called "Box." It is available to the world, because the USFS is utilizing technology. In 1990 (I was 5), I am guessing the plan was presented to the public in hard copies and testimony was either in person or submitted in hard copy. Technology has significantly changed life over the past two decades. Livestock production is feeling the effects of rapidly changing technology, much like USFS. Going forward, a Blue Mountain Forest Plan that allows and rewards good behavior on the forest while simultaneously being flexible in the changing world is necessary. In the last 10 years, per capita consumption of Lamb in the United States has increased around 0.5lbs per American. At the same time, national sheep numbers have decreased. A fair amount of that decrease has been due to USFS regulatory pressure, namely setbacks for bighorns. Foreign products are making up the difference. The multiuse mission is to protect and provide for Americans. Americans are eating lamb. The new generations are leading the charge (Gen Z and Alphas); we need more access to resources to feed and clothe the American

Populations going forward. I encourage you to make decisions with the USFS multi use mission in mind for the benefit of our fellow Americans, as well as the land. I end with the following requests: Don't Extend the setback requirements for bighorns.- Consider Opening or Expanding acres for domestic sheep into closed areas, using "site-specific" contact reduction plans. Prioritize the American consumer when you make any decision that effects livestock on the forest. My goal is to find a path that fosters biological diversity, respects public lands, and feeds America. I am always open to exploring new approaches and would love nothing more than co-designing the future with a partner like USFS. Sincerely, Cameron Krebs