

Data Submitted (UTC 11): 9/21/2026 8:34:34 PM

First name: Katy

Last name: Nesbitt

Organization: Wallowa County

Title: Natural Resources Director

Comments: Since 2003, the Wallowa County Board of Commissioners, with support from its Natural Resource Advisory Committee, has provided input and recommendations for the Blue Mountains Forest Plan Revision at each iteration. The BOC also helped lead a new partnership, the Blues Intergovernmental Council representatives who have worked together since 2019 to ensure the Plan represents the needs and concerns of their constituents when it comes to forest management.

In general, we support the Blue Mountains Forest Plan Revision Draft Environmental Impact Statement's Alternative 2. The following recommendations highlight where we support the Plan and where we offer changes to improve it. While other sources will be referenced, Recommendations that point to Goals, Objectives, Standards and Guidelines for active forest management are taken from the Wallowa County Natural Resource Management Plan. <https://www.co.wallowa.or.us/media/4091>

One of the strongest points of the proposed alternative, or Alternative 2, is that there is no wilderness or protected land proposed. On page 20 of the Wallowa County Natural Resource Management Plan, it states, "Due to the abundance of wilderness and other protected areas on the national forest land within Wallowa County, no further expansion is desired."

We understand that Travel Management is not a part of the BMFPR DEIS, and do not offer recommendations regarding that subject; however, we will soon have updated maps and spreadsheets of all the open and closed Wallowa County national forest roads. The first ground-truth mapping occurred in 2009. The effort was replicated over the summers of 2022-2025. If roads are proposed to be closed under future management decisions and Wallowa County's forest road maps indicate that they are open, our position is they remain open.

We urge the Forest Supervisors to follow national direction and eliminate the 1991 Roadless Rule and from Alternative 2. For example, re-evaluate the Recreation Opportunity Spectrum classifications in Appendix B. Classifying areas as semi-primitive Non-motorized is an informal way of perpetuating the 1991 Roadless Rule.

The Blue Mountain forests have moderate ecological integrity with some declining factors according to the analyses conducted. There is no question that our forests are predominantly overstocked with young and middle-aged trees and our grasslands are overrun with annual invasive grasses. We are experiencing more wildfire burning larger areas - a combination of climate and density of available fuel - both in the forest and on the rangelands. When the range burns with a high level of fine fuels, native plants are killed, opening up the landscape to annual invasive grasses that if not grazed annually, burn every two to three years, reducing fire intervals and increasing their intensity.

Increasing the pace and scale of fuels reductions in our forests, coupled with the use of grazing to control fine fuel build-up, national forest lands will regain ecological integrity with an upward trend, creating a forest that will survive future fires and continue to thrive.

We appreciate that the BMFPR reports and drafts released over the past few years better represent those who live and work in the Blue Mountain counties of Eastern Oregon and Southeastern Washington. In particular, we support the inclusion of the BIC's Socio Economic Report (Revised August 2023) commissioned as a baseline to ensure the US Forest Service's analysis was sensitive to the differing socio-economic communities of the Blues - while Baker City, La Grande, Pendleton and Walla Walla have substantial populations and access to major

interstates, many of the communities in the Wallowa-Whitman, Umatilla and Malheur national forests are remote, rely more on farming, ranching and timber for their base economies, and are hampered by haul costs to transport their products to regional markets.

The Report identified Wallowa County with the second highest exposure to US Forest Service management actions and fifth lowest in resilience. In short, the new Forest Plan will have a significant impact on the future trajectory of Wallowa County's economy, which today is influenced more by ranching and farming than timber. We agree with this statement of ecological and economic integration across public and private land -

"There is a strong interdependency between the Forest Service's need for forest management work and the degree to which local industries, infrastructure, employment (including youth), skilled workforce, and other factors provide for this need. Similarly, the larger social, economic and ecological resilience of this region depends on the condition, function and diverse benefit streams arising from the matrix of public, private and tribal lands. This matrix of forest lands provides a broad range of cultural, commercial, and non-commercial goods, services and associated values. Given the size and importance of the national forests in the region, changes in USFS management affect the challenges and opportunities accruing to adjacent landowners - which will generate feedback loops to the national forests."

The County's central concern is that the DEIS continues a planning approach rooted in the original 1969 National Environmental Policy Act era, when it was assumed that a landscape could be steered toward, and then held at, a fixed desired condition through management allocations and site-specific prescriptions. By the late 20th century, ecologists had largely abandoned the "balance of nature" model in favor of a disturbance-ecology framework in which fire, insects, disease, and drought are normal, integral drivers of landscape pattern rather than disruptions of an equilibrium state. The 2012 Planning Rule itself is built around this framework: it directs plans toward ecological integrity and ecosystem resilience under a changing climate, not toward fixed structural endpoints.

Recommendation: The Final EIS should replace or substantially supplement fixed management-area structural targets with landscape-scale, process-based direction that manages for the maintenance of characteristic disturbance regimes and self-similar, ever-shifting patterns of forest and non-forest conditions.

Forestry and Vegetation Management

Historical Range of Variability

Comment: The 2012 Planning Rule requires the use of the best available scientific information. The DEIS's tables of desired structural and compositional conditions are drawn from historical range of variability (HRV) estimates that many scientists have characterized as outdated, expert-opinion-based approximations rather than data-driven reconstructions. Better data and updated methods now exist to estimate a climate and fire-adapted future range of variability (FRV). Because the desired conditions in the DEIS are calibrated to an HRV baseline that does not represent the range of conditions the landscape actually produced historically, and does not anticipate the warmer, drier climate the region is now experiencing, the Plan's desired future conditions will become progressively harder to meet; not because implementation fails, but because the targets themselves are wrong.

Recommendation: Prior to finalizing the Plan, the Forest Service should re-examine the HRV/FRV reference conditions using current data and methods, in coordination with the Blue Mountains National Forests, Wallowa County, and other partners. Where updated FRV work cannot be completed before the Record of Decision, the Final EIS should explicitly identify FRV refinement as a priority near-term management tool to be applied at the project level, and should build enough flexibility into plan components that project-level decisions are not locked into an outdated HRV baseline.

Comment: In the discussion on "Departure in Forested Vegetation Structure and Composition" (page 25) - the DEIS states the following: "All alternatives would somewhat improve conditions, especially alternative 2, but not enough to shift integrity beyond moderate in the next 20 years. Because of the magnitude of treatments needed across the landscape, more active management would restore the forest and be more resilient. Ecological

change is anticipated to intensify and compound system stressors. However, given the ecosystem's low vulnerability and the high availability of habitat currently occupied by moist upland forests (allowing for shifts in distribution and relative abundance), it is likely this system would be resilient and persist in the face of future challenges (Halofsky and Peterson 2017). Therefore, we expect dry upland forests to deliver major ecological functions and services at a reduced but improving level relative to high integrity throughout the life of the plan." In the Blue Mountains potential vegetation classification, Moist Upland Forest (Moist UF) and Dry Upland Forest (Dry UF) are distinct systems with different elevational ranges, species composition, and - critically - different vulnerability profiles. If the DEIS is using a moist-forest vulnerability finding to justify a dry-forest conclusion, that's either a drafting/copy-paste error or a logical slide that the passage doesn't own up to. Either way, as written, logic is lacking.

Separately, the legacy of fire exclusion in Blue Mountains dry forests creating fir encroachment on historically pine-dominated, open sites is well documented as a structural driver of elevated insect/disease and uncharacteristic-fire risk - a decades-old finding that predates and compounds the climate signal.

The passage acknowledges stressors will "intensify and compound," then pivots straight to reassurance, without addressing whether the projected "reduced but improving" trajectory is contingent on whether active management (thinning, prescribed fire reintroduction to correct fire-exclusion legacy) is being implemented at a large enough scale.

Recommendation: The action required is greater than described in the Preferred Alternative. The US Forest Service should acknowledge the vulnerabilities of these landscapes to changing climate, disturbance and land use stressors and must develop a management strategy that restores forest health to the Blue Mountains through an integrated strategy of silvicultural and fire prescriptions and by managing lower elevation, seral ponderosa pine and western larch stands for lower tree densities with a more open coniferous understory.

Comment: None of the above will matter if the Plan cannot be implemented at the pace and scale the landscape requires. One factor that inhibits the scale of large projects is the "21-inch rule", otherwise known as the Eastside Screens, limiting timber harvest to trees over 21 inches. This is an arbitrary rule, not based on forest health or carrying capacity and hinders restoration.

Besides restrictions on the harvest of trees larger than 21 inches, project-level NEPA review timelines have repeatedly proven to be a binding constraint on active management in the Blue Mountains, and that process is easily used by opponents to delay work regardless of its ecological merit.

Recommendation: The Final EIS and Record of Decision should direct development of, or at minimum, explicitly support pursuit of, programmatic Categorical Exclusion authorities of this kind for the Blue Mountains National Forests.

DEIS Landscape Patterns and Connectivity (LPC), Page 129

Recommendations from the Wallowa County Natural Resource Management Plan:

GOAL: THE PUBLIC AND PRIVATE LAND IN WALLOWA COUNTY FUNCTIONS AS A HEALTHY ECOSYSTEM THAT IS AN INTEGRAL COMPONENT OF A LARGER BIOLOGICAL REGION. SUSTAINABILITY OF ECOLOGICAL FUNCTIONS AND PROCESSES IS DEEMED IMPORTANT TO MAINTAINING ECOSYSTEM HEALTH AND SHALL BE ATTAINED BY PROMOTING VEGETATION FOR SERAL STAGES.

» Objective Veg-O1.1: Manage the forest and grassland vegetation to maintain viable and healthy ecosystems that ensure the maintenance and/or enhancement of fish and wildlife habitats; conservation of scenic, wilderness, and scientific values; preservation of biologically unique species, habitats, and rare combinations of outstanding ecosystems; and wild and scenic rivers' outstandingly remarkable values.

» Objective Veg-O1.2: Manage vegetation to control insect and disease levels.

» Objective Veg-O1.3: Manage native and introduced vegetation at administrative and developed recreation sites to meet the objectives of the site plan and to meet health and safety needs of all users.

» Objective Veg-O1.4: As appropriate, maintain or restore ecosystem function, conserve soil, and enhance native plant species and communities. Maintain biological diversity and sustain long-term site productivity.

» Objective For-O6.1: Use salvage cuts for the primary purpose of removing trees that have been or are in

imminent danger of being killed or damaged by injurious agents other than competition between trees, or are damaged by fungi, insects, fire, wind, or other agents.

» Objective For-O7: Use sanitation cuts to eliminate trees that have been attacked or appear in imminent danger of attack by dangerous insects and fungi to prevent these pests from spreading to other trees.

GOAL: MANAGE FORESTED VEGETATION TO MAINTAIN AND/OR ENHANCE 1 FORESTED WATERSHED CONDITIONS.

» Objective For-O1: Follow the watershed approaches of the original Wallowa County - Nez Perce Tribe Salmon Habitat Recovery Plan for forest management as listed below:

- Guideline For-G1.2.7: Place (prescribed fire) treatment units strategically on the landscape to moderate wildfire behavior and aid in control. Consider breaking up the fire continuum at a landscape scale.

- * Standard For-S2.2: The group selection variant of uneven-aged management is designed to facilitate the establishment of shade intolerant species, reduce damage to the residual stand, and lengthen the cyclic entry period.

- Guideline For-G1.2.1: The tree density should be 40-50 percent shading (winter sun) at noon on 50 percent of all forested watersheds.

- Guideline For-G1.2.2: Maintain appropriate average density of trees, e.g. 50 - 110 square feet per acre basal area on south facing slopes and ridges and 90-160 square feet per acre basal area on north facing slopes.

- Guideline For-G1.2.3: Riparian management should be site-specific with the realization that the design of silvicultural treatments will be to enhance all the attributes of the riparian zone.

- Guideline For-G1.2.4: Vary thinning to emphasize spatial heterogeneity and achieve patchy/clumpy tree distributions. Leave skips (untreated areas) and gaps (openings) in units following treatment. Leave clumps of trees. Embed denser forest patches within a treated landscape to provide for sustainable diverse wildlife habitat over time.

- Guideline For-G1.2.5: Shift species composition from drought and fire intolerant species to drought and fire tolerant species. - Guideline For-G1.2.6: Reduce dwarf mistletoe's detrimental effects to the forest on a site-by-site basis.

- Guideline For-G1.2.7: Place treatment units strategically on the landscape to moderate wildfire behavior and aid in control. Consider breaking up the fire continuum at a landscape scale.

- Guideline For-G2.1.1: Individually selected trees are removed to maintain a desired range of tree sizes over a prescribed distribution. Cyclic entries designed to control the structure and species composition and provide the openings necessary for establishment and growth of the continuously occurring regeneration are a function of the site quality and resource considerations.

- Guideline For-G2.2.1: The opening created under the group selection prescription will often be no larger than one to two tree heights (as influenced by aspect and slope) so as not to lose the site protection afforded by the surrounding trees.

- Guideline For-G2.2.2: Size, shape, and location of groups should be designed to achieve landscape character goals and scenic integrity objectives.

» Objective For-O4.1: Use commercial thinning opportunities to accelerate the development of the "large diameter tree" component of late seral stand structure, improve stand health and vigor, and reduce the potential of major, stand-replacing disturbance events.

» Objective For-O5.1: Use precommercial thinning to improve the health and vigor of sapling-sized material and promote stand differentiation (a condition where individual tree dominance is expressed, rather than overall stand stagnation).

- * Standard For-S4.1: Choose residual densities to maintain wildlife habitat requirements, optimize stand vigor and health, meet landscape character goals and scenic integrity objectives, and allow for the future function of natural fire.

Wildfire

In the Blue Mountains, wildfires and other natural disturbances will continue to manage far more of the landscape than any combination of timber, thinning, or prescribed-fire program the Plan can fund or implement. The DEIS'

reliance on green-tree thinning as the primary tool for achieving desired conditions understates this reality. Thinning without follow-up prescribed fire is, at best, a partial treatment: several estimates suggest that prescribed burning is successfully applied to thinned units only about 25 to 30 percent of the time in the Blue Mountains.

Recommendation: The Final EIS should more directly acknowledge wildfire's role as the dominant landscape disturbance and avoid overstating the degree to which green-tree vegetation management alone can achieve landscape resilience objectives.

Forest Management should focus on the small to mid-size patches and patterns that will limit the size, severity and consequence of future fires. In some areas well-managed grazing may also be beneficial. The goal should be to establish the landscape patterns of forest and non-forest vegetation that allow the land and the associated biodiversity to continue to evolve with changing climate conditions.

Comment: This shift in approach will provide ample economic opportunity and benefit to local communities, as well as the regional forest workforce and infrastructure through a broad range of contracted work, increased harvest volumes, and opportunities to harvest small to mid-size burned trees from the post-fire landscape. Regional mill operators have told County officials that a sustained wood supply keeps mills open and that recently burned timber, harvested promptly, is a viable component of that supply.

Recommendation: The Final EIS should elevate postfire restoration - including postfire thinning distinct from conventional economic salvage - to a co-equal management priority alongside green-tree treatments and should quantify the volume and economic opportunity associated with a sustained postfire program.

DEIS Issue 5: Inventoried Roadless Areas, Page 7

Recommendation: Add an air quality analysis to Issue 5 on Inventoried Roadless Areas. The consequence of eliminating most fuels management from these areas contributes to large stand replacement wildfires, which are affecting our communities with unhealthy smoke each summer.

Recommendations from the Wallowa County Natural Resource Management Plan:

GOAL: MANAGE NATURAL AND PRESCRIBED FIRE TO EMULATE HISTORIC FUNCTION OF FIRE.

PROVIDE BASIC PROTECTION TO HUMAN LIFE AND PROPERTY.

» Objective For-O3.1: Where applicable, reintroduce fire into the ecosystem to protect and maintain diversified stand structures across the landscape.

* Standard Fire-S1.1: Management-ignited fires shall be conducted to mimic historic fire effects to the extent that safety, fuel accumulations, and social constraints permit. The use of fire would help reduce the negative impacts of future wildfires and past fire exclusion. Historic patterns of fire frequency, patch size, and seasonality would be considered in project design and program management. The role of fire as a component of landscape function should be assessed for all significant land management actions.

* Standard Fire-S1.2: Management-ignited fire from planned ignitions may be used in developed recreation sites, consistent with the management direction from adjacent management areas.

* Standard Fire-S1.3: Fire suppression shall continue as a necessary management action to protect life, property, and resources. Suppression actions will be conducted so as to provide the least cost-plus-loss that will meet land management objectives and provide the greatest degree of firefighter safety.

* Standard Fire -S1.4: Prescribed fire will be used for range management, watershed improvement and improve scenic values. Prescribed fires should not consume significant quantities of commercial wood products or herbaceous forage that could be removed in a commercially viable manner in a way that damages the long-term commercial viability of the resources.

- Guideline For-G3.1.1: Reduce the risk of fires burning outside of historic intensities and severities that could substantially reduce long-term productivity.

- Guideline For-G3.1.2: Use prescribed fire to maintain tree species compositions that occur under the natural disturbance regime, reduce competition, increase nutrients, prepare sites for natural regeneration, improve forage resources (including culturally significant food resources), enhance/create wildlife habitat, and protect private and public property values.

Invasive Species

DEIS Page 35

Alternative 2 uses a possible addition of 5,000 acres or targeted grazing to help reduce invasive species.

Recommendation: We request 5,000 acres be increased to 10,000 acres for targeted grazing to help reduce invasive plant species.

DEIS Page 123

Recommendation: Add jointed goat grass to the list of invasive annual grasses.

10. On Page 148, remove the phrase "but are not increasing in abundance or extent" from Desired Condition 8. Kentucky bluegrass, Timothy, and smooth brome can be important for forage abundance and noxious weed control. There's no need to suppress the abundance or extent of these species if they're serving a bigger purpose.

DEIS, Page 121, Management Approach (FW-WF-MAPR)

Add a management approach to Page 121 that shows a bias towards aggressive initial attack for suppressing all wildfires. Include a management approach to favor new technologies like remote sensing and drones to facilitate effective initial attack. Save prescribed fire for the spring and fall when fire intensity and soil damage can be better controlled.

DEIS Page 124

01. Detect and treat infestations of terrestrial and aquatic invasive plant species to reduce their occurrence.

Prioritize treatment of new infestations before they become established.

Umatilla NF: 3,000 acres annually

Wallowa-Whitman NF: 4,000 acres annually

Recommendation: The objective within the Invasive Species section of the document is to treat 3,000 to 4,000 acres annually for invasive species. At the rate suggested, most likely, more acres are becoming infested than are treated annually. For example, it is projected that the Great Basin loses 0.5% to 1.2% of the landscape to invasive annual grasses on an annual basis, this is an average of 25,000 square miles annually (<https://www.wifw.org>, 2026). We recommend that no less than 10,000 acres annually be treated within each of the forests until some of the areas that can increase the risk of catastrophic fires and threaten native perennial grass communities are significantly decreased.

Recommendations from the WC NRMP, Page 40

» Support the continuing efforts of the Wallowa County Weed board, Wallowa Canyons Partnership, and other partners as they implement the Wallowa County Integrated Weed Management Plan and efforts to address other invasive species.

Recommendations from the WC NRMP Page 74

* Standard Veg-S1.1: Insect and disease control methods will be holistically evaluated in appropriately scaled site-specific analyses before they are adopted or implemented.

- Guideline Veg-G1.2.1: Early prevention of (insect and disease) epidemics is favored over application of control methods after infestations have occurred. However, control must be a viable option, when necessary. Prevention methods may include silvicultural treatments, prescribed fire, biological controls, and grazing. Control options may include biological controls and spraying of appropriate pesticides.

Recommendations from the WC NRMP, Page 86

GOAL: MANAGE NOXIOUS WEEDS TO REDUCE NEGATIVE IMPACTS TO NATIVE PLANTS, WILDLIFE, AND OTHER RESOURCES.

» Objective Nox-O1.1: Use all feasible means to eradicate, control, contain, or otherwise reduce negative impacts of noxious weeds.

NRMP Chapter 6, pages 48-68

Invasive annual grasses and noxious weeds are identified as challenges throughout the NRMP's Chapter 6, Basin Briefs, with descriptions, challenges, and opportunities listed for each of the County's 20 HUC 10 and 12 watersheds.

Water Quality and Aquatic Ecosystems

DEIS Page 126

Management Approach 06. "Watersheds occupied by threatened or endangered aquatic species or their critical habitats...and resilience to contribute towards their recovery and conservation"

Recommendation: Reassess critical habitat consider past management activities how they continue to change conditions today.

Recommendations from the Wallowa County Natural Resources Management Plan, Page 38

ADDRESSING WATER QUALITY AND QUANTITY:

- » Manage water use to ensure water availability for the local ecosystems and economy.
- » Encourage natural water storage by restoring floodplains and wetland function.
- » Improve forest structure to store water in the snowpack.
- » Improve the water-holding capacity of working land soils.
- » Encourage good water management by supporting voluntary efforts to increase the efficiency of irrigation water storage, delivery, and application.
- » Maintain or restore the quality of surface water and groundwater.
- » Support voluntary efforts that manage cropland and uplands to minimize impact on riparian areas.
- » Encourage managing riparian areas on public land to supply shade, filtering and bank stability to the waterway.
- » Continue to improve vegetation in riparian areas unless it conflicts with fuels reduction efforts, public motorized access, or public recreation.

Non-forest Conditions

Aspen, Woodland, Shrubland, Grassland, Meadow, other Non-forested Habitats

DEIS Page 144

Comment: Roughly half of the historical Blue Mountains landscape - an estimated 48 percent - was in non-forest condition: wet and dry meadows, grasslands, shrublands, sparsely treed woodlands and savannas, wetlands, and burned or recovering areas. More than 80 percent of today's ponderosa pine forest type historically carried less than 30 percent canopy cover and functioned as woodland or savanna rather than closed forest, with most of the basal area concentrated in larger, older trees.

These non-forest and open-canopy elements are not a byproduct of degraded management; they are a primary regulator of fire behavior. The DEIS and its supporting desired-conditions direction do not adequately account for this dynamic.

Recommendation: The Final EIS should revise desired conditions, standards, and guidelines to (a) recognize non-forest and open-canopy conditions as a target outcome rather than a deficiency to be corrected, and (b) quantify anticipated increases in non-forest area under a warmer, drier future climate.

DEIS Page 145

Desired Condition, 01. "The composition distribution, and abundance of vegetation...resistant to disturbance and within an ecologically sustainable state"

Comment: Unfortunately, many areas have already reached a threshold and are now in a state that is not ecologically processing in a sustainable fashion. Fire, past management activities, prolonged absence of disturbance, climate change, invasive species, and other factors have altered vegetation composition, structure, and ecological processes across portions of the landscape.

Recommendation: Rather than treating all areas equally, we could provide a framework (Defend and Grow the Core strategy) for prioritizing areas where investment can maintain or expand existing ecological integrity and resilience, while also identifying areas where restoration is necessary to prevent further loss of function. Areas that retain relatively intact native plant communities, functioning soils and hydrology, and greater resistance and resilience to disturbance should be identified as priority areas for protection and proactive management. Surrounding areas where ecological function can realistically be restored should then be prioritized to expand and connect these resilient cores and reduce the likelihood that disturbance or invasive species will compromise them. Where thresholds have already been crossed management should be guided by site potential, feasibility, ecological function, and long-term resilience, rather than assuming that every site can or should be restored to a historic condition.

Desired Condition, 08. "Where the lack of native vegetation weakens ecological integrity...and not disruption ecological processes or function"

Recommendation: In areas where invasive annual grasses are well established, focusing only on restoring native vegetation may not address the immediate ecological risks. Invasive annual grasses can increase fire risk, reduce soil stability, compete with perennial plants, and contribute to continued site degradation. As climate conditions become warmer and more variable, some native perennial grasses may have a harder time competing with invasive annual grasses. In these situations, well-adapted perennial species, including some non-native or introduced species, may provide greater soil stability, forage value, erosion protection, and resilience than a site dominated by annual grasses.

Where appropriate, established perennial species or adapted cultivars could be used as a transitional management tool to prevent further degradation, improve site conditions, and create opportunities for more diverse and resilient vegetation to establish over time. The goal should be to maintain and improve ecological function while moving sites toward their greatest practical potential. The objective should be to prevent further degradation, maintain ecological function, and create conditions that allow desirable perennial vegetation to persist and expand - which follows the Defend and Grow the Core strategy.

Recommendation: Remove "but are not increasing in abundance or extent"

Recommendations from the WC NRMP, Page 83

GOAL: MAINTAIN OR ENHANCE THE RIPARIAN CONDITIONS IN WALLOWA COUNTY.

» Objective Rip-O1.1: Improve hardwood diversity that is appropriate (within) site capability (riparian shrubs right next to stream, terrace shrubs on drier sites)

» Objective Rip-O2.1: Improve riparian/wetland vegetation to increase streambank stability, water quality, dissipate energy during high flows and appropriately filter sediment/nutrients from runoff.

- Guideline Rip-G1.1.1: An adequate forage base for harvest by wildlife and domestic livestock at the livestock levels being grazed shall be maintained.

- Guideline Rip-G1.1.2: Maintain or enhance streambank vegetation.

* Standard Rip-S1.2: Managing to maintain native and desirable non-native plant species will provide for all seral stages in abundance and distribution.

Species Diversity/Species at Risk/Species-Specific Consequences

DEIS Page 37

Recommendation: Add pressure from predators as a factor when analyzing the species-specific consequences for elk.

DEIS Page 147

Recommendation: We support the changes made to incorporate Standard 02 as well as the change in the language regarding the water trough designs and agree with Management Approach 03.

DEIS Page 148

Recommendation: Remove "specific ecological niche depending on species habitat characteristics involved" from

the scale of how Species of Conservation Concern will be considered on SCCs are important to consider overall viability of these species on a forest-wide scale. Analyzing effects on individuals or local populations for the over 300 species on that list creates an unrealistic burden on project-level analysis.

DEIS Page 151

"Section 7(a)(1)...while pursuing land management activities", Also, Standard 01.

Recommendation: We request that the critical habitat piece within The Plan area be reassessed based on the changes made to ESA.

DEIS Page 155, Wolves

Guidelines 02. "To reduce disturbance to denning wolves.....wolf den and rendezvous sites should implement appropriate site-specific restrictions",

Recommendation: Since wolves have become a prominent feature on the landscape in Eastern Oregon, the Forest Service has not had much involvement in the management of the wolves or reducing the conflict. This is not a guideline that seems appropriate due to the lack of involvement so far, and the lack of personnel within the Forest Service who can become involved. We request that this guideline be removed.

DEIS Page 155, Bighorn Sheep

"The potential for spread of disease for domestic sheep.....within a 21.75 miles (35km) of bighorn sheep herds,"

Recommendation: A five-to-seven-mile buffer was used within the Westside EIS. This buffer along with the protocol described within the Westside EIS, similar to the one describes within the Bighorn section of The Plan, has worked well for the last 16 years at eliminating co-mingling of these species on federal lands. We recommend changing the 21.75 miles to 6 miles or less if geographic barriers are present and will limit contact with bighorn sheep herds. This is recommended as this is the control area used for foot and mouth which is a much more contagious disease.

The third bullet point states "Count domestic sheep as they go onto and off the permitted areas...within 24 hours, and the permittee is to make a concerted effort to find the missing sheep."

Recommendation: Change "24 hours" to "in a timely manner".

"Manage recreational uses to prioritize heath to bighorn sheep herds". This point does not seem to fit within the context of a section discussing grazing domestic sheep.

Recommendation: Place this point within the recreation section of The Plan or create a separate section under Bighorn sheep that discusses recreational concerns.

DEIS Page 156, Marten

The measures to protect marten (Guideline 9 on Page 156) are another example of micromanaging individual species habitat at the expense of broader forest objectives.

Their sentence

But not at the expense of appropriate fuel breaks along roads.

09. To reduce the risk of population-level fragmentation, when working in marten habitat:

- * Consider retaining higher canopy cover in drainages, north facing slopes, and riparian corridors where conditions permit,

- * Consider improving connectivity where cover is lacking by retaining some brush piles or slash piles that are large enough for marten to use, contain at least two large-diameter logs, and c

Rangelands, Forage, Livestock Grazing (RNG)

DEIS Page 176, Range Objective 01. This plan establishes a framework for managing and maintaining healthy rangelands that support the local community by providing sustainable economic opportunities for livestock grazing. Additional opportunities for livestock use are pursued where appropriate. Authorized livestock grazing on active and vacant allotments is available based on resource conditions...

Recommendation: Follow the above objective authorizing livestock grazing on active and vacant allotments when managing grazing allotments on US Forest Service-managed public land.

DEIS Page 178 Guidelines (FW-RNG-GDL) 07. To maintain shrub health and reproduction capability, upland shrub utilization of annual leader growth or other agency accepted monitoring protocol should not exceed 40 percent by all ungulates as determined by a science-based method.

Recommendation: Change utilization to "percent use". You cannot measure what is missing, therefore you cannot get to utilization. Percent use is simply the number of leaders that are grazed vs. non grazed. Protocol should be 50 percent, as the easiest to calculate, and the difference between 40 and 50 percent is not detectable in ecological terms.

DEIS Page 178, Management Approach 04. Consider analyzing vacant and forage reserve allotments for livestock grazing to provide temporary permitted livestock grazing opportunities, especially when active allotments are rested for ecological needs.

Recommendation: To support Wallowa County's beef industry and the local economic input it provides, we request the following be considered from the Grazing Action Plan and the associated Line Officer Implementation of the Advancing Grazing on Forest Service and BLM Lands Memorandum of Understanding.

Grazing on National Forest System (NFS) lands is critical to the health of our landscapes; to providing sustainable beef, lamb and wool for America's food and fiber supply; and for maintaining the fabric of rural America.

Recommendation: The continued use of livestock grazing to reduce fine fuels susceptible to wildfire, reopening vacant allotments, and using vacant allotments to expand ranchers' opportunity for long term grazing stability language from the MOU:

h. Maximize the use of targeted grazing, considering vacant allotments, as an active management tool to achieve cost effective resource improvements utilizing the Targeted Grazing Toolbox.

Recommendation: Follow the MOU's list of steps consistent with applicable law and regulations to further support ranchers and remove barriers to grazing on their units starting now. This includes:

- A. Expanding access to prioritize permitting vacant and closed allotments,
- B. Maximizing grazing flexibilities to keep working lands working,
- C. Eliminating delays by streamlining permitting and allotment authorizations,
- D. Elevating rural Americans by giving ranchers a better voice, and
- E. Improving service by setting expectations for positive engagement with ranchers.

DEIS Page 177

Guideline 05. "To allow desirable plants time to recover...not grazing at the same time every year, and not during the entire vegetative growth period..."

Recommendations:

- 1) As a result of past consultation and concerns with "critical habitat" as well as the idea of potential "harm", many pastures within allotments have been pigeon-holed into very specific dates annually where grazing is allowed. This means grazing at the same time of year, every year. With the change in critical habitat and the rescission of harm, we request that pastures within allotments be re-assessed after the finalization of The Plan, and a more flexible grazing schedule followed to allow this guideline to be met.
- 2) Consider virtual fence to manage livestock herds.
- 3) Reduce time to reauthorize allotments from a 15-year schedule to a 10-year schedule.

MA2B Research Natural Areas (RNA)

DEIS Pages 191-193

Recommendation: There are three management approaches that are specified for RNA's within The Plan. We request that these approaches do not inhibit current grazing practices that may overlap the RNAs.

DEIS Page 203

Guideline 03. Aerial application of chemical retardant, foam, or other fire chemicals must not be authorized within 300 feet (slope distance) of any waterway (including but not limited to perennial streams, intermittent streams, lakes, ponds, identified springs, reservoirs, vernal pools, wetlands, and peatlands).

Recommendation: Eliminate or edit Standard 3 on Page 203 regarding aerial application of retardant from "must not" to "avoid" to match the 2024 Record of Decision for Nationwide Aerial Application of Fire Retardant on National Forest System Lands. Fire managers need as many tools as possible for effective initial attack. As currently worded, this standard restricts aerial application of retardant beyond the national standard and arbitrarily removes an important firefighting tool.

DEIS Page 203

Standard 04. "Authorizations must be designated to avoid livestock trampling of federally listed threatened or endangered fish redds"

DEIS Page 205 Guidelines 12. "To reduce grazing management activities in riparian management areas....use during a less sensitive time"

Recommendation: Livestock grazing will not cause impairment to the population if cattle graze within a riparian area while fish are spawning or eggs are incubating in the redds. As a result of eliminating grazing during these times, livestock typically only use the riparian areas during the hot, dry part of the season. This in turn causes more damage to the riparian system through loafing and protein-seeking activities of the livestock. If the livestock used these areas earlier in the season, and in a rest-rotational manner, less overall impacts to stream banks and riparian areas would occur, which would be better for both the fish and the resources within the watershed. We would like The Plan to consider this aspect within the analysis.

Monitoring

DEIS Pages 224-226

Recommendation: Because the desired conditions and structural targets in the DEIS rest on an outdated HRV baseline and a static allocation model, the monitoring plan built to track progress toward those targets inherits the same problem: it is designed to monitor conditions and trends that do not reflect how this landscape actually functions or what a resilient future condition should look like. Wallowa County finds it difficult to constructively review a monitoring plan built on this foundation.

Recommendation: Monitoring questions and indicators should be revised in tandem with the desired-condition and reference-condition changes requested above, with explicit attention to landscape-scale patterns of forest and non-forest area, disturbance extent and severity, and postfire treatment outcomes - not solely stand-level structural metrics tied to the current HRV tables.

Appendix B-1: Aquatic and Riparian Conservation Strategy

DEIS Page 259

...the Aquatic and Riparian Conservation Strategy (ARCS) for the Blue Mountains National Forests is comprised of several elements: Key Watersheds, Riparian Management Areas, Watershed Analysis, Watershed Restoration, and Monitoring and Adaptive Management. Interaction of all five elements at the watershed and landscape-scales provides the basis for watershed, aquatic, and riparian ecosystem management and restoration. These elements work together and complement each other to achieve the goal of appropriately distributed watershed conditions.

Comment: This strategy focuses on restoring the habitat but doesn't take into consideration the other impacts to anadromous fish - hydroelectric dam and hatchery impacts, avian predation, ocean predation, and most importantly, ocean conditions. We manage the rearing and spawning grounds, but listed steelhead and salmon

use hundreds of miles of habitat to complete their life history.

Recommendation: We recommend studying streams for fish presence/absence and if a trend shows that no fish are using a stream, it could be reclassified as "non-fish bearing." Wallowa County Atlas. <https://www.grmw.org/>

Appendix B-2: Proposed and Possible Actions

DEIS Page 275

Recommendation: Consider adding virtual fences to the list of active restoration actions in the Aquatic and Riparian Ecosystems.

DEIS Transportation Infrastructure, page 279

Recommendation: In recent years the Forest Service has not had the funds to support annual maintenance of existing roads. Will there be funding to make this happen into the future? If not, we recommend stating a road maintenance action that is attainable.

Appendix C: Species of Conservation Concern

DEIS Page 296

Recommendation: Remove "specific ecological niche depending on species habitat characteristics involved" from the scale of how Species of Conservation Concern will be considered.

DEIS Pages 300-308, Species of Conservation Concern lists

Recommendation: 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. Wallowa County requests that these species be reviewed by biologists who recommend future actions that might help their overall survival and vet those recommendations before beginning a project planning process. Additionally, remove any species of concern that are only found in the Hells Canyon NRA.

Critical Habitat

On August 20, 2026, the following rule became effective. This was posted in the Federal Register on July 31, 2026: "...the U.S. Fish and Wildlife Service (FWS or the Service), amend portions of our regulations for section 4 of the Endangered Species Act of 1973, as amended (Act or ESA). Specifically, we revise regulations related to section 4(b)(2) of the Act. Section 4(b)(2) requires consideration of the economic impact, the impact on national security, and any other relevant impact of designating any particular area as critical habitat and authorizes the exclusion of areas from critical habitat if the benefits of excluding the area outweigh the benefits of designating it as critical habitat."

Recommendation: With the changing of the rule for critical habitat, we request that some of the areas currently considered as critical habitat within The Plan be re-evaluated due to recent administrative orders. The rationale behind this request are that some areas on these forests, particularly ephemeral and intermittent channels that have been labeled as critical habitat, but are not fish bearing, nor have the ability to provide habitat, have been used in the past as a contention for causing non-compliance with livestock permittees.

Harm (ESA)

On September 14, 2026, the following rule became effective. This was posted in the Federal Register on July 14, 2026:

"We, the U.S. Fish and Wildlife Service (FWS) and the National Marine Fisheries Service (NMFS; collectively referred to as the "Services") rescind the regulatory definition of "harm" in our Endangered Species Act (ESA or the Act) regulations. This rescission removes the regulatory definition of "harm" from the Code of Federal Regulations (CFR) in Title 50 parts 17 and 222."

Recommendation: With this rescission, look at areas of critical habitat and or areas that have been subject to permit non-compliance. We request that this especially be true in areas where ephemeral and intermittent channels have been the cause of non-compliance issues where ESA listed species have been identified in

perennial stream reaches lower in the watershed.

Blue Mountains National Forests Watershed Condition and Water Quality Assessment
BMNF WCWQA Page 8

Trends - Completion of all essential projects identified within a watershed restoration action plan is assumed to result in an improved watershed condition.

Comment: This report assesses watershed conditions with very limited data, derived from many different sources with different goals and methods. From that data a solution is devised and implemented, and it is assumed the action implemented improved the watershed conditions without follow-up monitoring or quality control.

The main cause of at-risk conditions is water temperature. Many streams are above temperature standards as they enter managed forest land from the wilderness.

Recommendation: Monitor sites pre and post restoration and document results and trends.

BMNF WCWQA Page 10

It is important to note that the Blue Mountain national forests and ecoregion include five and nine percent of the 207 PIBO reference streams, respectively. Most of these reference streams are in wilderness at high elevations with higher precipitation than managed sites. Although physical and climatic variables are used to normalize results across all locations of the PIBO monitoring programs.

Comment: Reference site locations make this report invalid; they are all in the wilderness at high elevation where the sites receive high amounts of precipitation.

Recommendation: Use site locations at variable elevations with variable precipitation and temperature to ensure good data collection.

Understanding that these comments are comprehensive, we invite you to meet with us to discuss these recommendations as you work toward an FEIS and Record of Decision for the Blue Mountains Forest Plan Revision.

Sincerely,

John Hillock

Lisa Collier

Cody Lathrop

References

Robert W Mutch, et al. 1993. Forest Health in the Blue Mountains: A Management Strategy for Fire-Adapted Ecosystems. USDA FS PNW-GTR-310.

Johnston, J.D., Bailey, J.D., Dunn, C.J. et al. Historical Fire-Climate Relationships in Contrasting Interior Pacific Northwest Forest Types. *fire ecology* 13, 18-36 (2017). <https://doi.org/10.4996/fireecology.130257453>

Paul F. Hessburg, James K. Agee, Jerry F. Franklin. Dry forests and wildland fires of the inland Northwest USA: Contrasting the landscape ecology of the pre-settlement and modern eras. *Forest Ecology and Management* 211

(2005) 117-139.

Emil K Heyerdahl, Linda B Brubaker, and James K Agee. Spatial Controls of Historical Fire Regimes: A Multiscale example from the Interior West, USA. *Ecology*, 82(3), 2001, pp. 660-678

Paul F Hessburg, Miller CL, Parks SA, et al. 2019. Climate, Environment, and Disturbance History Govern Resilience of Western North American Forests. *Front. Ecol. Evol.* 7:239. doi: 10.3389/fevo.2019.00239

Paul F Hessburg, Kurz, W.A., Prichard, S.J., et al. 2025, The western North American forestland carbon sink: will our climate commitments go up in smoke? *Front Ecol Environ*, 23: e2869. <https://doi.org/10.1002/fee.2869>

Paul F Hessburg, S. J. Prichard, R. K. Hagmann, N. A. Povak, and F. K. Lake. 2021. Wildfire and climate change adaptation of western North American forests: a case for intentional management. *Ecological Applications* 31(8):e02432. 10.1002/eap.2432

Blues Intergovernmental Council. 2023. Final Socio-Economic Report.

Doug Burgum, US Secretary of the Interior, Brooke Rollins, US Secretary of Agriculture, March 31, 2026, Grazing on Forest Service and BLM Lands Memorandum of Understanding.

https://www.usda.gov/sites/default/files/documents/mou-advancing-grazing-usfs-blm.pdf?utm_medium=email&utm_source=govdelivery

Brooke Rollins, US Secretary of Agriculture, June 12, 2026, Line Officer Implementation of the Advancing Grazing on Forest Service and BLM Lands Memorandum of Understanding and the USDA-DOI Grazing Action Plan. <https://www.usda.gov/sites/default/files/documents/forest-service-grazing-memo.pdf>

Frederick C. Hall and Timothy Max, November, 1999, Technical Note: Test of observer variability in measuring riparian shrub twig length, *Journal of Range Management* 52:633-636.

Wallowa County Atlas Fish Habitat Restoration Partnership Technical Assistance, Wallowa Fish Habitat Restoration Partnership Technical Assistance

Grande Ronde Model Watershed, Wallowa County Atlas, <https://www.grmw.org/>