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Comments: see attached please

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RE: Blue Mountains Forest Plan Revision Release Final Assessment and Draft Preliminary Need to Change

The Oregon Hunters Association (OHA) is a sportsmen[rsquo]s conservation organization with over 12,000

members in 26 chapters across Oregon. OHA values our National Forests as a public place to hunt and recreate, and as a valuable asset providing habitat for the wildlife we care about. As such, the management and access of these lands are of critical importance to OHA. We have been engaged in numerous projects to improve and protect habitat conditions, and we value our partnership with the U.S. Forest Service (USFS). We are providing comments and input on the Blue Mountains Forest Plan Revision Final Assessment and Draft Preliminary Need to Change.

As the Assessment Report points out [ldquo]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.[rdquo] The assessment report also states [ldquo]Hunting was the most popular activity[rdquo] amongst all the recreational uses. Maintaining and improving this popular recreational activity should be a priority throughout the planning process.

We would like to see the Forest Plan focus on several on-going challenges to address several key factors. Habitat management, wildlife management and recreational management are all important elements that OHA believes should be focal points. Healthy abundant wildlife populations can only be achieved through good forest management practices and habitat management principals.

With that, we would like to call attention to several key species.

Rocky Mountain Elk

As the assessment report points out, overall elk populations are generally good throughout the planning area. However, there are several specific areas where populations are below the Oregon Department of Fish and Wildlife (ODFW) Management Objectives.

Elk distribution has been a very difficult and controversial issue. A lack of proactive habitat management to promote and sustain quality summer and winter range has shifted elk use towards private lands and away from public lands. This has led to reduced hunting and viewing opportunities and satisfaction on the public lands and increased problems of elk damage on private lands.

We feel that this issue needs to be addressed from multiple perspectives and one of the key opportunities is habitat enhancement performed on the public lands, which connect to the elk-impacted private land. We believe direction in the Blue Mountain[rsquo]s Forest Plans should address the challenges of elk distribution by focusing on the following factors.

1. Creating favorable forage conditions to attract, sustain, and hold elk on public lands to reduce conflicts on private lands. During most years elk in the blues begin moving off with the first archery season (end of August) and many leave the public lands before the first elk season ends (October).
2. Active management such as thinning and prescribed burning to promote forage production. OHA strongly supports active forest management and are supportive of timber harvest, thinning, and prescribed burning. We suggest incorporating creation of gaps to enhance big game forage for a longer period than provided by a normal thinning. Skips in the thinning process should be carefully incorporated into thinning prescriptions and be well distributed to retain a cover component throughout treatment areas.
3. Reducing open road densities to improve elk security. Elk generally are disturbed by roads within a half mile of their location and managing strategic roads could help create more elk security and assist in maintaining elk on the National Forest. Elk security can be improved by closing or seasonally closing open motorized access. 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).

OHA recommends that the Forest Service identify and create areas of elk security that also includes good forage so that the elk do not have to leave these areas to find high value forage. This could include 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. Keeping in mind that 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.

Mule Deer

The assessment report recognized the current state of mule deer populations in the region stating [ldquo]Decreasing deer numbers throughout the western United States is complex but can be partially

explained by mule deer[rsquo]s need for early and mid-successional habitats that have declined due to a

lack of disturbance either from fire or mechanical (timber harvest) treatment. Managing forest stands

toward a natural range of variation and increasing the amount of open canopy forest may be

beneficial to mule deer but is not expected to cause a perceptible increase in populations.[rdquo]

The assessment report also referenced the then DRAFT Oregon Mule Deer Management Plan. That plan was finalized in June of 2024 and includes the latest information on mule deer in the Blue Mountains region. That plan also identifies multiple mule deer herd ranges that overlap with the planning area, the current population status and trend of each herd range, and includes a number of high priority strategies that should be incorporated into the forest plans.

Specific items of consideration for mule deer management and recovery should include:

1. The plan needs to include a discussion on the importance of shrub steppe 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.
2. OHA supports the emphasis and recognition of Connectivity Corridors. The conservation of migration corridors for mule deer are critically important and should be managed as such. High use mule deer migration corridors are now identified by ODFW and should be a key consideration in the plan. The updated forest plans should adhere to the language addressing migration corridors from the Secretary[rsquo]s Memorandum 1077-013 [ldquo]Conserving and Restoring Terrestrial Wildlife Habitat Connectivity and Corridors in the United States[rdquo].
3. Only the Malheur 1990 forest plan specifically references mule deer. Mule deer deserve specific habitat and management needs throughout all the forest planning process. This should include an objective to manage cover, forage quality, quantity, and distribution as well as road use to recover and sustain population levels as identified in the Oregon Mule Deer Management Plan (best available science).

Bighorn Sheep

OHA is very happy 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 also interested in the monitoring component of the planning rule for the SCC list. Monitoring of bighorn 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 Blue Mountain Forests specify the use of annually collected ODFW data to fulfill the monitoring requirement of the 2012 Planning Rule.

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, respiratory disease will chronically limit bighorn numbers and distribution.

The plan should address the primary impacts to bighorn sheep:

1. 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, chronic or sporadic adult mortality up to local population extirpations.

Pathogen transmission to bighorn sheep is controlled by maintaining separation between bighorn sheep and domestic sheep and/or goats. Regarding domestic sheep and goat/wild sheep conflicts, Forest Service (FS) policy and direction should be to:

(A) achieve effective spatial and temporal separation of authorized domestic sheep and/or goats from wild sheep, and

(B) to minimize risk of contact between the species.

(C) Actively monitor for stray domestic sheep and goats within occupied bighorn sheep habitat

OHA believes 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. When making resource management decisions and conducting environmental analyses of proposed grazing management the FS should continue to provide opportunity for public participation.

1. Habitat degradation from invasive weed invasion, forest succession and climate change should be proactively addressed. Much of the invasive weed invasion stems from post fire emergence. Proactive post fire restoration can at least partially address this.
2. An analysis related to migration corridors and the potential for genetic exchange between bighorn sheep herds to ensure long term viability should be considered in the planning process. This should be emphasized in the connective corridors discussion.

As stated earlier, the assessment recognizes the popularity of hunting in the region, and its benefits to the local communities and economies. As recreational user demands continue to increase on our national forests, hunting as the leading recreational use in this planning area, should not be compromised in any future planning process. Ensuring the plan has strong elements to address dispersed recreation, and provides for the habitat needs to support strong resilient wildlife populations will be key to keeping this vital recreational opportunity available.

Thank you for the opportunity to comment.

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