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To Whom it May Concern:

I'm submitting public comment in response to the grazing portion of the Draft Environmental Impact Statement (DEIS) for the Blue Mountains Forest Plan Revision. I am going to focus on sections specifically addressing rangelands, forage, livestock grazing, and related management objectives, standards, and alternatives.

It's understood that the role and importance of livestock grazing is a historical and ongoing use of the Blue Mountains National Forest, contributing to local economies, culture, and land management (e.g., fine fuels reduction and invasive species control). Grazing is managed through term permits and is required by federal law (Multiple-Use Sustained-Yield Act of 1960) to be considered as part of multiple-use management. I would start by dropping it as a consideration and enacting the language to make it more of a standard tool.

Obviously, I have opposition to both Management Alternatives 1 and 3. No action and use under Alternative 1 does nothing to address the need for targeted livestock grazing to reduce non-beneficial species or the potential to increase stocking rates. Alternative 3, even though it maintains the current grazing plan, allows for more restrictive and subjective management that will hinder appropriate management and flexibility. Alternative 2 is highly preferred and will open up more options for flexibility and adaptation to conditions on the landscape. I would also highly recommend the use of technology, i.e., virtual fence options, in all scenarios to enhance targeted grazing.

Grazing objectives should be to maintain healthy rangelands that support sustainable livestock grazing practices and enhance the local economy. Livestock grazing should be used for vegetation management, including fine fuels reduction and invasive or non-beneficial plant species reduction. The language stating that general upland forage utilization by "all" ungulates should range from 35% to 50%, depending on ecological condition and factors, as well as that shrub utilization should not exceed 40% of annual leader growth, again demonstrates the subjectivity these ranges could have.

In Alternative 2, targeted grazing as a tool for reducing fine fuels and invasive plants states that it carries a risk of a potential increase in non-native forages and invasive species if not closely monitored. Again, this is a subjective approach to monitoring, as well as overlooking the benefits of non-native forages to "all" ungulates. All non-native forages still hold an abundance of benefits to wildlife and livestock that graze, as they may reduce pressures on the native forages available. Also, in Alternative 2, there are fewer impacts to botanical species through planning and design, as it is inefficient to use temporary fences and herding to achieve targeted grazing. Instead, this reinforces the use of virtual fencing to accomplish the task with minimal impacts.

Currently, the permitted annual Animal Unit Months (AUMs) are stated at 104,095 AUMs in the Malheur NF, 46,621 AUMs in the Umatilla NF, and 81,673 AUMs in the Wallowa-Whitman NF. These levels should be adjusted to increase or decrease depending on range condition, while maintaining a target of a 5% increase in base numbers. To achieve this goal, the current vacant allotments should be utilized.

In summary, grazing management is adaptive, with adjustments made based on resource conditions and utilization goals as previously mentioned, with less restrictive NEPA analyses. The grazing portion of this Blue Mountains Forest Plan, although maintaining current permitted grazing levels, should still be flexible, with a suggested growth in utilization through introduced targeted grazing to enhance vegetation management. This approach emphasizes adaptive management techniques, ecological integrity, and protection of sensitive habitats.

The plan needs to address concise and clear standards, guidelines, and monitoring requirements by the applicable forest managers to ensure grazing is sustainable and compatible with resource objectives, with less restrictive attributes.

Sincerely,

Jake Seavert
Commissioner