Exhibit B

Public Correspondence Received as of February 25, 2026

From: Jason Isaacson
To: Minam Plan * ODFW
Subject: access for disabled or handicapped outdoors men and women
Date: Tuesday, September 9, 2025 3:32:43 PM

> You don't often get email from minamtown@gmail.com. Learn why this is important

To Whom It May Concern,

Does the plan include consideration for those that cannot ride or walk into the lower reaches of the area as it is not wilderness? If not, is there consideration for this type of access to the area? As Boise Cascade Land it was, at times, available from the Minam Grade green gate toward the top, or up Big Canyon.

Thanks for your response.

Jason Isaacson

From: YANKE Jeff * ODFW
To: Minam Plan * ODFW
Subject: FW: MRWA
Date: Thursday, September 11, 2025 3:11:37 PM

From: Joe McCormack <joemc@nezperce.org>
Sent: Wednesday, September 10, 2025 12:49 PM
To: YANKE Jeff * ODFW <jeff.yanke@odfw.oregon.gov>
Subject: MRWA

Jeff, I'm going to ask a question about Treaty right on the Minum River Wild life area, how's the State view them on that particular area is my question.

Best regards
Joseph McCormack
Tribal Activist

Sent from my U.S.Cellular© Smartphone
Get Outlook for Android

From: Grant Richie
To: Minam Plan * ODFW
Subject: Feedback-Minam River Wildlife Area Draft Management Plan
Date: Thursday, September 18, 2025 3:17:29 PM

As a landowner beside the Minam Wildlife Area, the management plan is very important to me as it affects me, my family, and my business more than most.

I am excited to see there are plans to add camping and a foot bridge someday.

My only real disappointment with the plan is the overly restrictive access 4 months out of the year. I never thought public acquisition of private property would reduce public access, but this is precisely what has happened. Where we had year round access to the property under corporate timber ownership, we have now lost access 4 months out of the year.

I understand the desire to protect winter range for elk, but the closure begins too early. It is one of the few places I can take my young boys to go upland bird hunting that isn't too steep for them, I am gone guiding multi-day trips through November and not able to take them out bird hunting until December when our guide season has ended. The early closure of the Minam Wildlife Area has erased a tradition we had each winter when I was finally home for the winter and able to spend quality time in the woods and canyons with them.

Please reconsider the winter closure and make it a more reasonable length if you have it at all. Public acquisition of private land should not reduce public access. The current closure stops public access for 2 months of the upland bird season and prevents local residents from being able to introduce youth to the opportunities that were available before it became public land.

Thank you,

Grant Richie
Minam Store Outfitters
541-437-1111
www.minamstore.com

From: ODFW Minam River
To: Minam Plan * ODFW
Subject: Minam River Wildlife Area draft management plan [#1]
Date: Tuesday, September 23, 2025 9:11:43 AM

Name	LOGAN COOK
Email	loganpcook@gmail.com

Enter comments here:

Please keep any camping in the area simple. Put extra emphasis on leave no trace. From what I have seen, Fire rings and horse camps have the highest ecological impact in the adjacent area. Perhaps only allow camping winter-summer, so as to minimze impacts of siginifcant hunting camps being set up. While the suspension bridge will allow better acess it may also create higher impact by enabling the use of more elaborate camping setups in the area so I would encourage that It be built as small and simply as possible. Lastly, If trail systems are to be further developed I would highly encourage a separation between horse traffic and foot traffic. Hiking through highly eroded, dusty, horse manure filled trails really takes away from a hiking or hunting experience.

From: Jeremy Davis
To: Minam Plan * ODFW
Subject: Minam River Wildlife Area (MRWA) draft management plan
Date: Tuesday, September 23, 2025 10:13:12 PM

Hello ODFW -

The plan is well written and goals 1,2 and 4 I agree with. However, Goal 3 proposes allowing camping in the wildlife area in the future, and this is my concern.

Reasons I disapprove of changing the rules to allow camping in future:

- Allowing day use only as currently managed, makes this place unique and different from the thousands of acres of forest service and BLM land in this area.
- There are currently 5 drive up access sites that currently allow ample access to the area.
- Access is easy already with the various roads and trails, and it is no more than 5 miles to center of property from an access point. Hardly remote or challenging for most users.
- Multilple user groups already use the area as is from hiking, horseriding, and biking.
- Would rather the state focus their time and resources on habit improvement and maintenance of current infastucture rather than managing and cleaning up after campers.
- Already plenty of camping opportunites in the area: Minam State recreation campground, Alder springs access point, and along the Minam river on the Forest service south of Mead flat.
- Though 17,000 acres, the area is not that big in comparison to wildlife needs and camping would cause more unneeded pressure.
- With the Anderson ranch located on property and the managment of cattle, there is already more than enough human activity during hunting season to not need to allow camping as well.
- I enjoy seeing the beauty of the area and would rather not see fire rings, log benches, meat poles and remnants of latrines - not to mention garbage that campers don't feel like packing out.
- I currenlty enjoy this wildlife area for hunting as I know when I leave the trailhead in the morning I am not going to end up hiking for an hour only to find a hunting camp with someone at it, and that got put in a week before the hunt even started.

I work in healthcare and find it difficult to take long stretches of time off so I don’t have the ability to have time off work to allow me to camp for multiple days during the hunting season, but enjoy a place I can go for one day and know there are no ATVs and campsites where I am going. It truly becomes an escape for my wellbeing. In fact, after almost 2 decades of hunting, I got my first buck out of there on a day trip and is an experience I will never forget and one that I hope fellow Oregonians will get to enjoy for decades to come.

Respectfully,

Jeremy

Sent from my iPhone

From: Blake Hamalainen
To: Minam Plan * ODFW
Subject: Comments on Draft Plan - Access Dates
Date: Friday, September 26, 2025 2:10:12 PM

Hi,

Under current interim rules the uplands of the Minam River Wildlife Area are closed to public access beginning Dec. 1. ODFW issues youth cow elk tags for the Minam GMU through the tag lottery system that are valid until the end of the calendar year (Dec. 31). I strongly recommend ODFW adopts rules allowing access to the uplands of the Minam River Wildlife Area through the end of the calendar year in alignment with this hunting opportunity extended to youth hunters.

Prior to purchase by ODFW, this tract was open to public hunters through December thanks to the Access and Habitat program and I'm not aware of any adverse effects on wildlife habitat or populations.

Thank you for your consideration,

Blake Hamalainen
503.341.7836

September 29, 2025

To: Director Colbert

Subject: Minam River Wildlife Area – Draft Management Plan.

The following comments on the Draft Minam River Wildlife Area (MRWA), Draft Management Plan are from the Oregon (OR WSF), Midwest (MW WSF) Chapters Wild Sheep Foundation, and the Wild Sheep Foundation (WSF).

We have provided comments to Oregon Department of Fish and Wildlife (ODFW) concerning bighorn sheep (BHS) management needs on the MRWA on several occasions since the purchase of this amazing property. We have also provided financial support for the purchase and are available to support the management plan. Proactive BHS management is critical for disease-free wild sheep populations.

We would like to see Bighorn Sheep (BHS) more prominently discussed in the MRWA. This is historic BHS habitat and there have been sightings on the MRWA as recent as last year (see attached Hells Canyon BHS Health Update 240918 - map on page 4).

Bighorn Sheep *(Ovis canadensis)* are among nature's most awe-inspiring animals. Native to western North America, wild sheep usually live in remote and rugged habitats. They have high ecological and economic values and are culturally and socially important. They are a vital component of the natural heritage of North America. The historic and recent distribution of wild sheep in western North America has changed with time; while once widespread, their ranges and populations are far smaller today.

BHS populations declined significantly between the mid-1800s and the mid-1900s and have never fully recovered. BHS were extirpated in many states across the West during that time, due to many factors including disease, habitat disturbance/loss from human activities, effects of a changing climate, and predation.

The most significant threat to BHS is respiratory disease (pneumonia) caused by bacteria transmitted from domestic sheep or goats or other infected wild sheep. Outbreaks of pneumonia have occurred in BHS herds for

decades, throughout their range. These "die-offs" continue to cause catastrophic population declines and herd losses. Evidence that association or contact between domestic sheep and BHS leads to respiratory disease in BHS is overwhelming (Besser, et al. 2008, Clifford et al. 2009, Foreyt et al. 1994, Silflow et al. 1993). Although some adult bighorns appear to have or acquire immunity to pneumonia-causing pathogens, disease continues to impede lamb survival in the years to decades following disease-introduction events (Cassirer et al. 2013).

Strains of *Movi* carried by domestic sheep were clearly distinguishable from strains carried by domestic goats, indicating that the strain type analysis could indicate the likely source host of this pathogen. Researchers have successfully identified the sources of *Movi* strains that were transmitted from domestic sheep and domestic goats, under range conditions, that resulted in BHS pneumonia outbreaks (Dr. Tom Besser, Declaration, Feb. 26, 2021).

Multiple BHS populations in the Hells Canyon area, the Wallowa's and throughout the Blue Mountains have experienced high rates of mortality due to pneumonia outbreaks from the 1980s, through the present. ODFW is actively monitoring another ongoing disease event as we write this letter. The origin of these outbreaks has been documented as domestic sheep and/or goat strains of *Mycoplasma ovipneumoniae* (Movi), which continues to have lingering effects. Many of these populations have not recovered, and are currently limited by low lamb survival, primarily due to persistent pneumonia-caused mortality. Pathogen transmission to BHS is controlled by maintaining effective spatial and temporal separation between BHS and domestic sheep and/or goats.

BHS continue to exist and, in some places, thrive often due to intensive restoration and monitoring efforts, including funding from conservation partners. Active management includes moving animals to re-establish new populations, closing or moving domestic sheep and goat allotments, and actively managing and monitoring nearby domestic sheep and goats. The Hells Canyon BHS Initiative (HCI) includes much of the northern and eastern Blue Mountains, including the Wallowa Mountains and the MRWA. The HCI has been an established partnership since the BHS die-off in the mid-1990's. Even with this active management, BHS populations are a fraction of their historic numbers and currently occupy a small proportion of their original range.

Bighorn sheep across the Nez Perce and Confederated Tribes of the Umatilla Indian Reservation Tribe's treaty territory, are a culturally significant treaty resource (Pinkham 2007). Based on archeological evidence and verbal histories of tribal elders, bighorn sheep were the primary game animal that sustained the Nez Perce way of life prior to European settlement (Randolph and Dahlstrom 1977, Pinkham 2007). Bighorn sheep were used for a large variety of purposes, including food, clothing, tools, utensils, and weapons (Pinkham 2007). The Tribe is in the process of designating bighorn sheep as a tribal critically imperiled species (Nez Perce Tribe 2016) and continues to work towards bighorn sheep restoration with state, federal, and other partners.

We respect the access sought by those that use domestic goats as pack animals. However, allowing their use in bighorn habitat is simply not worth the risk to BHS populations. Best Management Practices are NOT foolproof, and the presence of domestic goats in proximity puts BHS populations at risk. The States of Washington and Oregon have already banned the use of pack goats in other wildlife management areas that contain BHS. It only takes one incident to have catastrophic consequences that could take decades to overcome.

OR WSF is still concerned that pack goats are not prohibited in the new Minam Wildlife Management Area. This area is historic bighorn sheep habitat, there are populations of bighorn sheep just south and north of this

management area and last year some yearling collared bighorn sheep traveled onto the lower Minam and Big Creek, which is part of this wildlife management area and the HCI (see attached Hells Canyon BHS Health Update 240918 - map on page 4). We believe that ODFW should include the prohibition of pack goats on the Minam Wildlife Area because of this.

We are glad to see that there will be active management of the MRWA. Habitat, wildlife, and recreational management are all important elements that should be focal points. Healthy abundant BHS populations can only be achieved through good wildlife, forest, range and recreation management practices. Invasive nonnative plants can replace native vegetation, rendering foraging areas unusable for BHS. Landscape vegetation treatments and large fires have the potential to create new BHS habitat or increase connectivity between existing habitats. This could allow BHS to utilize new or additional areas.

The experience today of seeing BHS along the rivers, roads and trails of the Wallowa Mountains was not always available. BHS were extirpated from the entire state of Oregon. BHS are only present due to the massive efforts of agencies, tribes and conservation organizations that have been willing to invest time and money in the efforts to bring them back and then continue the massive efforts to keep them in these landscapes. We do thank ODFW for their active and extensive partnership leading in the restoration of Oregon's BHS populations.

We thank you for the opportunity to comment on the Minam River Wildlife Area, Draft Management Plan, and we look forward to continued participation.

Respectfully,

Kevin Martin
OR WSF President

Mike Bouton
Midwest WSF

Gray N. Thornton President
President & COE WSF

Corey Mason
Chief Operating Officer &
Executive VP of Conservation

CC: NPT
CTUIR

The following is some information with references and links to publications related to the transmission of disease from domestic sheep/goats to wild sheep. There is good evidence for pathogen transmission from goats to BHS. It is true that domestic goats seem to pose a relatively lower health risk to BHS than domestic sheep. That is not the same as no risk, especially considering how severe the consequences can be.

1. Domestic sheep and goats carry genetically different strains of Movi. A pneumonia outbreak in BHS at Heller Bar in 2014 was associated with the introduction of a domestic goat strain (Cassirer et al. 2017).

2. A pink-eye epizootic in BHS in Arizona was associated with contact with domestic goats (Jansen et al 2006).

While accounts of disease transmission to BHS from domestic goats are less frequent than from domestic sheep, respiratory pathogens that can cause disease in BHS, including *Mycoplasma ovipneumoniae*, are regularly detected in apparently healthy domestic goats (Heinse et al. 2016, Drew and Weiser 2017). Transmission of Movi and other bacteria between BHS and domestic goats has occurred in free-ranging conditions, although spillover of Movi is detected less frequently than from domestic sheep (Rudolph et al. 2003, Kamath et al. 2019). No disease or mortality was reported in early experimental commingling of domestic goats with BHS (Foreyt 1994); however, the Movi status of those goats is unknown. More recent captive commingling experiments produced pneumonia and/or transmission of Movi to BHS, though epidemic mortality was not observed (Foreyt et al. 2009, Besser et al. 2018).

The following is a list of scientifically published studies to support the disease transmission from domestic sheep/goats to wild sheep, many of which were associated with studies done in Washington State University. While we respect that the Blue Mountain National Forests are accessed for a wide variety of uses, it is imperative to protect fish and wildlife from uses that are scientifically proven to cause a threat.

Besser, T. E., E. F. Cassirer, K. A. Potter, and W. J. Foreyt. 2018. Exposure of bighorn sheep to domestic goats colonized with Mycoplasma ovipneumoniae induces sub-lethal pneumonia (vol 12, e0178707, 2017). PLoS One 13. https://doi.org/10.1371/journal.pone.0178707.

Cassirer, E. F., K. R. Manlove, R. K. Plowright, and T. E. Besser. 2017. Evidence for strain-specific immunity to pneumonia in bighorn sheep. Journal of Wildlife Management 81:133–143. http://dx.doi.org/10.1002/jwmg.21172

Drew, M. L., and G. C. Weiser. 2017. Potential disease agents in domestic goats and relevance to bighorn sheep (Ovis canadensis) management. PLoS One 12:e0173396. https://doi.org/10.1371/journal.pone.0173396

Foreyt, W. J. 1994. Effects of controlled contact exposure between healthy bighorn sheep and llamas, domestic goats, mountain goats, cattle, domestic sheep, or mouflon sheep. Proceedings of the Biennial Symposium of the Northern Wild Sheep and Goat Council 9:7–14. media.nwsgc.org/proceedings/NWSGC- 1994/1994-Foreyt.pdf

Foreyt, W. J., E. J. Jenkins, and G. D. Appleyard. 2009. Transmission of lungworms (Muellerius cappilaris) from domestic goats to bighorn sheep on common pasture. Journal of Wildlife Diseases 45:272–278. https://doi.org/10.7589/0090-3558-45.2.272

Heinse, L. M., L. H. Hardesty, and R. B. Harris. 2016. Risk of pathogen spillover to bighornsheep from domestic sheep and goat flockson private land. Wildlife Society Bulletin 40:625–633. https://doi.org/10.1002/wsb.718.

Jansen B. D, J. R. Heffelfinger, T. H. Noon, P. R. Krausman, and J. C. deVos, Jr. 2006. Infectious keratoconjuncivitisin bighornsheep, Silver Bell Mountains, Arizona, USA. Journal of Wildlife Diseases 42:407 – 411. https://doi.org/10.7589/0090-3558-42.2.407

Kamath, P. L., K. Manlove, E. F. Cassirer, P. C. Cross, and T. E. Besser. 2019. Genetic structure of Mycoplasma ovipneumoniae informs pathogen spillover dynamics between domestic and wild Caprinae in the western United States. Scientific Reports 9:15318. https://doi.org/10.1038/s41598-019-51444-x

Rudolph, K. M., D. L. Hunter, W. J. Foreyt, E. F. Cassirer, R. B. Rimler, and A. C. S. Ward. 2003. Sharing of Pasteurella spp. between free-ranging bighorn sheep and feral goats. Journal of Wildlife Diseases 39:897– 903. https://doi.org/10.7589/0090-3558-39.4.897

Additional References:

Besser, T. E., Highland, M. A., Baker, K., Cassirer, E. F., Anderson, N. J., Ramsey, J. M., Mansfield, K., Bruning, D. L., Wolff, P., Smith, J. B., & Jenks, J. A. (2012). Causes of pneumonia epizootics among bighorn sheep, Western United States, 2008–2010. *Emerging Infectious Diseases*, *18*, 406–414.

Besser, T. E., E. F. Cassirer, K. A. Potter, J. VanderSchalie, A. Fischer, D. P. Knowles, D. R. Herndon, F. R. Rurangirwa, G. C. Weiser, and S. Srikumaran. 2008. Association of *Mycoplasma ovipneumoniae* infection with population-limiting respiratory disease in free- ranging Rocky Mountain bighorn sheep (*Ovis canadensis canadensis*). Journal of Clinical Microbiology 46: 423–430

Clifford, D. L., B. A. Schumaker, T. R. Stephenson, V. C. Bleich, M. L. Cahn, B. J. Gonzales, W. M. Boyce and J. A. K. Mazet. 2009. Assessing disease risk at the wildlife-livestock interface: A study of Sierra Nevada bighorn sheep. Biological Conservation. 142 (11): 2559- 2568.

Cassirer, E.F., R.K. Plowright, K.R. Manlove, P.C. Cross, A.P. Dobson, K.A. Potter, and P.J. Hudson. 2013. Spatio-temporal dynamics of pneumonia in bighorn sheep. Journal of Animal Ecology 82:518–528.

Declaration of Dr. Tom Besser in Support of Plaintiffs' Motion for Preliminary Injunction - Case file No. 2:20-cv-00440-RMP ECF No. 20 filed 2/26/21 pageID.1039 U.S. District Court, Eastern District of Washington.

Foreyt, W., K. Snipes and R. Kasten. 1994. Fatal pneumonia following inoculation of healthy bighorn sheep with Pasteurella haemolytica from healthy domestic sheep. Journal of Wildlife Diseases. 30 (2): 137-145.

Nez Perce Tribe. 2016. Plant and Wildlife Conservation Strategy of the Nimiipuu. Nez Perce Tribe, Department of Natural Resources, Wildlife Management Division, Lapwai, Idaho, USA.

Pinkham, Josiah. 2007. Declaration of Josiah Pinkham. United States District Court for the District of Idaho, Case

No. 07-151-BLW.

Randolph, J. E., and M. Dahlstrom. 1977. Archaeological test excavations at Bernard Creek Rockshelter. University of Idaho Anthropological Research Manuscript Series No. 42, Moscow, Idaho, USA.

Silflow, R., W. Foreyt and R. Leid. 1993. Pasteurella haemolytica cytotoxin-dependent killing of neutrophils from bighorn and domestic sheep. Journal of Wildlife Diseases. 29 (1): 30-35.

Hells Canyon Bighorn Sheep Health Update: June - September 18, 2024

Hells Canyon Initiative Partners

Field update

Pneumonia spread

In late June and early July 2024, *Mycoplasma ovipneumoniae* (Movi) and pneumonia were first detected in 2 dead sheep along the Grande Ronde River in Washington. Previous detections in this outbreak that originally started in Idaho in December 2023 had all been along the Snake River in Idaho, Oregon, and Washington. In June 2024, a ram in Wenatchee Creek (Mountain View) that died on June 27 tested positive for Movi and a ewe that died on June 30 at Shumaker (Black Butte) also tested positive. Over the summer, Movi and pneumonia spread through Shumaker on the Grande Ronde and Mountain View (Figure 1). Unexpectedly, pneumonia seems to have skipped the lower Grande Ronde at and above Heller Bar (Black Butte) for the moment. A single strain of Movi (BHS-056) continues to be identified by the Washington Animal Disease and Diagnostic Laboratory (WADDL) throughout the infected area.

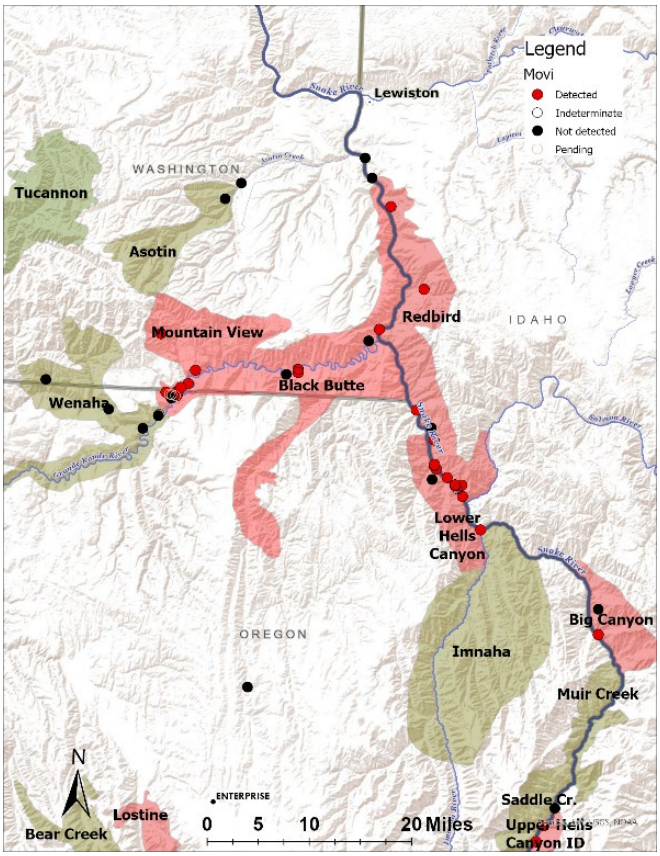


Figure 1. Spread of the Hells Canyon pneumonia outbreak into the Black Butte and Mountain View populations during the summer of 2024. Pneumonia and Movi has been detected in populations shaded in red at the red dots, and not in populations shaded in green or at the black dots.

The summer pneumonia outbreak in Oregon and Washington was progressively more severe than the winter outbreak in Idaho and more focused on females. About 60% of the collared females in Mountain View died in August, as compared to 15% of collared females that died in Redbird, Idaho last winter (Table 1). This summer we found dead sheep along the Grande Ronde River Road near Snyder Bar in Black Butte and from Wenatchee Creek to the Redmond Grade Bridge in Mountain View. We investigated 4 mortalities of adult females (2 collared and 2 uncollared) at Snyder Bar in the Black Butte population that died from the end of June to the beginning of July and 21 mortalities of yearling and adult females and yearling males (17 collared, 2 marked but uncollared, and 2 unmarked) in Mountain View during August and early September. The mortality rate in lambs is unknown, but likely high. Most unmarked sheep that die are never found.

Population	Pneumonia mortality of collared females	Pneumonia mortality of collared males	Pneumonia mortality of collared yearlings	Population estimate[1] w/o lambs	Minimum estimated pneumonia mortalities
Black Butte, WA	20%	0	0	No data[2]	No data
Mountain View, WA-OR	61%	20%	67%	142	90
Lower Hells Canyon, OR	17%	No data	No data	No data	ND
Redbird, ID (GMU11)	15%	38%	NA	187	50
Big Canyon/Upper Hells Canyon, ID (GMU 13, 18)	NA	17%	NA	72	6

[1] Population estimate prior to pneumonia outbreak.

[2] No data indicates no recent population estimate or insufficient numbers of collared sheep.

Table 1. Current minimum estimates of bighorn sheep pneumonia-related deaths between December 2023 and early September 2024 based on mortality rates of collared sheep and population estimates where available. These deaths are in addition to mortalities from other causes. Lambs are not included in mortality rates or population estimates.

We noted blood and foam in the noses, lungs, and thoracic cavity of several of the sheep that died in Mountain View and WADDL also found blood in the eyes (hyphema) in a yearling 22MV33 as well as noting the blood in the thoracic cavity. Thinking it might be a reason for the high mortality rate, WADDL recommended testing for Epizootic Hemorrhagic Disease and Bluetongue Virus which we agreed to, and all tests were negative. Ultimately it was concluded that many of the associated lesions which in addition to pneumonia included hyphema and meningitis (22MV96), and the overall severity of the disease, may have been due to septicemia (blood borne infection, sometimes called blood poisoning). However, the cause of the septicemia is unknown.

No pneumonia or Movi was detected in adult sheep in Wenaha, Asotin, and Big Canyon that died during this period (one in each population, Figure 1).

Exploratory movements and dispersal of yearlings

A group of 5 yearling rams, including two with collars: one captured in Wenaha in March and the other in Mountain View in November, moved south towards Enterprise in early July (Figure 2). They turned around and headed back north on July 10 but due to concerns about possible contact with domestic sheep, ODFW lethally removed two of the uncollared rams in the group on July 11 and submitted them to WADDL. They were negative for Movi infection and exposure. The collared rams (and presumably the remaining uncollared ram) returned to Wenaha a week later and have stayed there since, although they are no longer together.

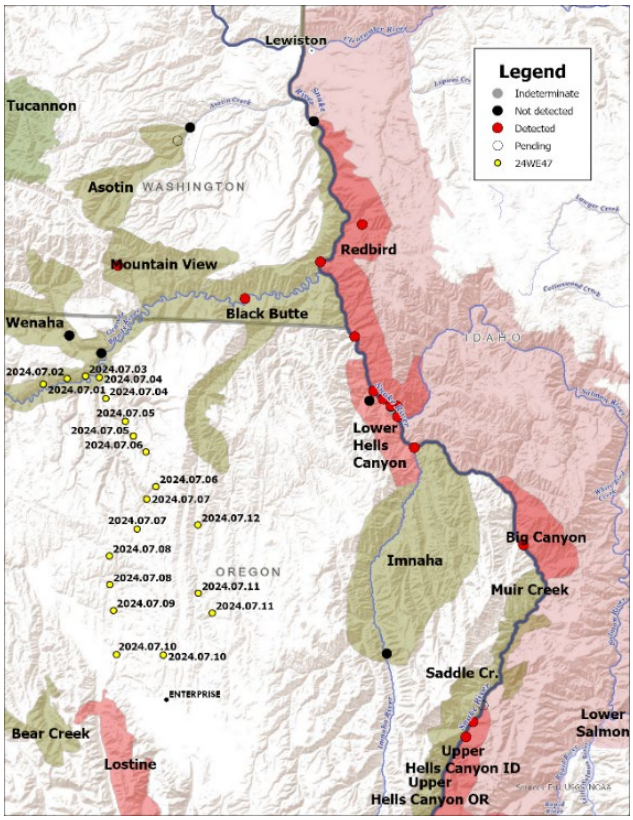


Figure 2. Movements of yearling ram 24WE47, accompanied by 23MV94, July 1 – 12.

Since Movi is a directly transmitted pathogen and we are observing a single strain in Hells Canyon, it seems that the spread of infection and disease observed this summer must be caused by infected bighorn sheep moving between populations. A total of 26 GPS collared yearlings were monitored this summer (15 females and 11 males) in the Asotin, Black Butte, Lower Hells Canyon, Mountain View, and Wenaha populations. They made exploratory movements into unoccupied habitat and between populations more frequently than we have observed in adults. These particular collared yearlings were

not the cause of the spread of pneumonia in Hells Canyon that we observed this summer, but it is very possible that, in general, young animals may be the most likely age class to move Movi between groups of sheep during summer. Over the past two years, a third of GPS-collared yearlings (14/39) have left their natal population during the summer (males 67%, females 17%, Figure 3). This information is important for assessing and managing risk of transmission and we plan to collar 6 – 9-month-old lambs again this winter.

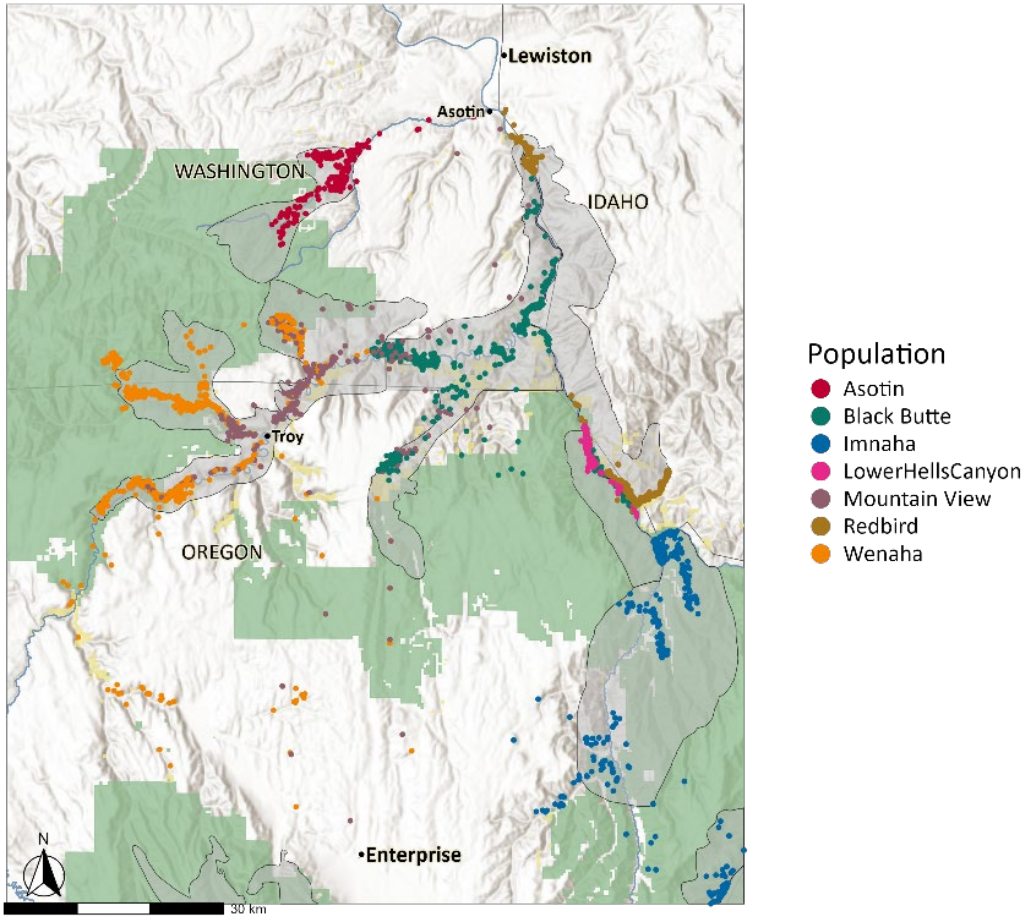


Figure 3. Movements of collared bighorn yearlings in Hells Canyon May – August 2023 and 2024. Locations are colored by natal population.

Future direction

We're continuing to monitor sheep on the ground as we expect additional spread of pneumonia in Oregon and Washington during fall, associated with movements of males during the rut. We are planning to capture, collar, and test over 100 bighorn sheep starting with ground darting in October and continuing with helicopter captures in February and possibly December as schedules allow. The captures will help to assess the health status of populations and determine next steps for management. Many thanks to WAWSF, IWSF, ORWSF, and National WSF for financial support.

From: SKoyle
To: Minam Plan * ODFW
Subject: Comments for MRWA Management Plan
Date: Monday, September 29, 2025 8:10:30 PM

First, I want to thank the department for allowing the public to comment on the plan and to be part of shaping the future of the Minam River Wildlife Area (MRWA). This landscape is deeply meaningful to many people. I found the draft plan to be well-written—clear, concise, and focused. I fully support Goals One, Two, and Four as presented. I especially appreciate that a primary focus for the MRWA is habitat protection and connectivity.

Goal Three, however, is where I hope to encourage some reconsideration. The proposed allowance of camping within the wildlife area is my greatest concern. Currently, camping is prohibited, and I believe that policy has been the right approach for managing this unique piece of state land. Unlike the vast forest and wilderness areas to the south, the MRWA offers day use only, which makes it distinctive. While the wildlife area encompasses 17,000 acres, it is easily accessed by five vehicle entry points, with most sections no more than five miles from one of them. A network of roads and trails already provides excellent access for those traveling by foot, bike, or horseback.

Part of the value of this system is knowing that when I set out from an access point, every other visitor is starting their day from the same conditions—without worrying that I'll hike several miles only to find someone has been camped there for days. This accessibility is especially important for people like myself, whose work and family commitments (my boys playing sports) make extended camping trips difficult. Despite that, my family and I still spend considerable time in the MRWA—over seven days this year alone, and an average of sixteen days annually. We enjoy hunting turkeys, grouse, bear, deer, and elk, along with the many other ways the area can be appreciated.

As a hunter, I am usually inclined to support more access, freedom, and camping opportunities. In fact, when I first explored the MRWA, I thought camping would be a welcome addition and even noted several potential spots. But the more I came to know the area, the more I realized that its relatively modest size made its current protections valuable. It is refreshing to know that wildlife here can have the night free from human presence. The absence of campfire rings, improvised benches, meat-hanging poles, and outhouse remnants enhances the natural beauty and diversity of the Minam.

For these reasons, I believe the state's resources would be better invested in habitat improvement projects and the maintenance of existing infrastructure rather than in the costs of managing and cleaning up after campers.

Thank you for your time, and for including the public's voice in decisions about this special place.

--

Shane Koyle

kakoyle@gmail.com

Topic: Minam River Wildlife Area Management Plan
Date: October 8, 2025

Contact: Monty Gregg (BMEI Operations Coordinator)
Phone: (541) 416-6508
Email: monty.gregg@usda.gov

On behalf of the Blue Mountain Elk Initiative, thank you for the opportunity to comment on the Minam River Wildlife Area Management Plan.

In June of 2025 ODFW hosted the BMEI summer field review. At that time the BMEI Operations Committee had the opportunity to tour the MRWA, view the variety of habitat types, and really understand the habitat value provided to the overall watershed. Many habitat management conversations were had during the field tour by our committee, and we appreciate seeing those incorporated into your management plan. BMEI supports the objectives that have been outlined in the Management Plan and the strategies utilized to accomplish those objectives. Furthermore, we are confident you will attain these objectives based on the quality and expertise of ODFW staff that will be informing the Management of the Wildlife Area. Below are some suggestions to think about as you begin to implement your management strategy.

- Terrestrial Resource Working Group - ODFW is more than capable of managing this property with their highly qualified staff. However, there are benefits of a Terrestrial Resource Working Group (TRWG) when you are networking with other State, Federal, Tribal, and Private Land Management Professionals. I have been involved with TRWG's, through the Federal Energy Relicensing Commission, implementing habitat management projects on hydropower mitigation properties. The State, Federal, Tribal, and private biologists provide a network of ideas, contemporary management strategies, and project funding opportunities. This may already be something that occurs through your local watershed council or other collaborative working groups. TRWG's **DO NOT** include any NGO/Conservation Organizations as they bring too much of their constituent's agenda along.

- Thank you for including the use of the NRCS Ecological Site Descriptions and State and Transition Models. These will be the building blocks of the Habitat Management Units that have been delineated. Objective 2.1 is very thorough and clearly explains the overall strategies. Although the various habitat types/Plant Association Groups have been mapped and quantified, it will also be important to quantify the structure/seral class of the forested habitats as well. This will assist with adaptive management strategies, based on the decadal review of stand development or lack thereof.

- As you know recreation management will be a primary key to anchoring animals on this landscape. It is exciting to see that motorized access is limited within the MRWA, therefore creating an amazing opportunity to support the BMEI elk security objectives. With that said, recreation grant opportunities will be important source of funding for much of the work/infrastructure that has been identified. This property is a perfect blend of conservation and recreation and therefore meeting the intent of Oregon Conservation and Recreation Fund. Oregon Wildlife Foundation is the fiscal sponsor for these funds and could also provide administrative support for much of the work that has been identified.

Thank you again for this opportunity.

State of Oregon
WALLOWA COUNTY
BOARD of COMMISSIONERS
101 S. River Street #301
Enterprise, Oregon 97828

541-426-4543 ext#1130
Fax: 541-426-0582
Email: commissioners@co.wallowa.or.us

Commissioner Lisa Collier
Commissioner Mike Hayward
Commissioner John Hillock

October 15, 2025

Jeff Yanke
Oregon Dept. of Fish and Wildlife
65495 Alder Slope Rd
Enterprise, OR 97828

Dear Jeff,

The Wallowa County Board of Commissioners submits the following comments on the Minam River Wildlife Area Management Plan.

The MRWA plan states in several places that ODFW will take an active approach to land management recognizing that conditions on the land dictate active management to move the area to the desired condition. These active management strategies include:

1. Management including timber harvest and thinning
2. Livestock grazing
3. Noxious weed control using all available methods
4. Riparian restoration projects
5. Active fire control efforts

We strongly support this active management approach. Timber harvest and grazing are necessary to move the land to the desired condition as prescribed fire would be a significant risk at this time due to fuel loads. We also support the recognition that work is needed in the riparian areas and that it may include tree removal in some places. Also, it may be beneficial to remove larger trees, potentially larger than 21 inches, for long-term forest health benefits. This active management approach is also an economic benefit to the local community.

Besides fire suppression to prevent large, catastrophic fires putting undo smoke in the air, burning up valuable rangeland and threatening private values at risk, we are concerned about access, especially during fire season. The access roads should enable fire equipment and crews quick response times. The roads are rough and outright nasty in places, but timely access is critical to keeping the landscape intact for habitat.

We also have a concern about the Deer Creek Bridge and road. It is unclear if this plan recognizes that the Deer Creek Bridge is a county bridge and that the Deer Creek Road is a county road for approximately 2.5 miles. Clarification is needed as to ODFW intentions pertaining to this bridge and road.

The following are detailed comments, many with comparisons to the Wallowa County Natural Resources Management Plan.

Page 3

"Hunting, angling, foraging and gathering opportunities will be available to the public where they complement wildlife conservation goals."

WC COMMENT: There are references throughout the Wallowa County Natural Resource Management Plan (WCNRMP) to hunting, angling, foraging and gathering. These activities are integral with the socio-economic and cultural values of the residents of Wallowa County and the Nez Perce Tribe/Nimiipu who retain treaty rights to these practices on open and unclaimed land, in addition to access to stock water. We support public access to the Minam River Wildlife Area for these activities.

Page 5

"Ensuring management of MRWA is consistent with federal and state laws, in addition to state and local natural resource plans."

WC COMMENT: We understand this statement to mean that this plan and its implementation on the MRWA will be consistent with the Wallowa County Natural Resource Management Plan. https://www.co.wallowa.or.us/media/4091

Page 11

"The primary purpose of the MRWA is to maintain and protect landscape level connectivity, conserve key habitats, and sustain ecological functions that support numerous endemic species. ODFW plans to accomplish this with the application of active management principles with an ecosystem-based management philosophy.

WC COMMENT: We support ecosystem based active management as well as landscape-scale and cross-boundary treatment, where applicable, to achieve maximum forest health and resiliency.

"In recent years, the U.S. Forest Service, with active participation from agency and organization partners and members of the public, began focusing on landscape-scale vegetation management that aims to reduce fuels and increase forest health and resiliency." (WCNRMP p. 46)

"Of primary importance, enhancing historic winter range for Rocky Mountain elk."

WC COMMENT: Adequate access to public land for elk, especially winter range, reduces impact on private land.

"Some fish and wildlife species in Wallowa County conflict with agriculture and ranching and residential uses. Elk herds are increasingly using private lands for grazing as their habitat on public lands deteriorate from encroaching conifers, areas with limited livestock grazing, and poorly managed predator populations." (WCNRMP, p. 26)

Page 12

"Where natural functions are limited, active management will serve as a proxy to these processes. A host of modern land use practices and management activities serve as a surrogate for the loss of natural disturbance regimes when natural processes are not available or socially tolerable."

WC COMMENT: *"The Plan underscores the continued need for the collaborative, consensus-based, ridgetop-to-ridgetop approach to adaptive management..." (WCNRMP, p. 10)*

Page 13

"Protecting and enhancing connectivity in this area is key to implementing ODFW's elk and mule deer management plans in northeast Oregon."

WC COMMENT: *"Mule deer populations are greatly reduced, and some of their remnant populations have moved into the towns to avoid predators and take advantage of abundant food sources." (WCNRMP p. 26)*

"Streams throughout the MRWA support federally threatened Chinook salmon, steelhead, and bull trout. The Minam River is designated as a wild production area for Snake River spring/summer spring Chinook salmon, and Snake River summer steelhead (NMFS, 2017a). The Minam River and its tributaries are listed as critical habitat for bull trout (U.S. Fish and Wildlife Service, 2015a). These waters also serve as habitat for recently re-established populations of Pacific lamprey and coho salmon."

WC COMMENT: Most Wallowa County perennial streams are home to ESA-listed fish. Much work has occurred since the Wallowa County Salmon Habitat Restoration Plan was published in 1993 as a response to the threatened listing of Snake River Chinook Salmon. Between 1993 and the release of the WCNRMP in June 2024, *"195 miles of in-channel ESA fish habitat (was) improved or restored." (WCNRMP p. 9)*

Page 14

"Strategy 1.1.3: Remove fencing as appropriate to facilitate wildlife movements across the MRWA while managing a rotational grazing program (see Strategies 2.2.3, 2.3.3, and 4.14). Strategy 1.1.4: Where needed, replace existing fence with wildlife friendly and/or virtual fencing to encourage movements between pastures while limiting the risk of entanglement (see Strategies 2.2.3, 2.3.3, and 4.1.4)."

WC COMMENT: Virtual fence is proving effective on the East Moraine Community Forest. Now in its second year of use as part of a pilot project administered by Wallowa County OSU Extension and Wallowa Resources and funded by OWEB and private donors, the program is successful enough for the Community Forest's executive committee to agree to the continued use of virtual fence to reduce costs, especially of interior, pasture fencing and gates, and for less impact on wildlife and recreationists.

"Strategy 1.1.5: Ensure that habitat enhancement projects are implemented in a manner that provides a diversity of habitat types to support wildlife movement (see Goal 2)."

WC COMMENT: *"All species require connected habitats to maintain genetic diversity and respond to natural and human-caused disturbances. Many species of fish and wildlife are migratory, needing connected habitats to access seasonal resources or complete their life cycles. Anadromous fish like salmon, steelhead, and Pacific lamprey must migrate hundreds of miles from the headwater streams in Wallowa County to the Pacific Ocean, where they reside for several years before returning to the same headwater streams to spawn. Resident fish like bull trout and rainbow trout don't travel all the way to the ocean, but migrate along the stream network for the spawning, rearing, and foraging needs of their life cycles. Since the inception of the salmon plan in 1993 Wallowa County has supported millions of dollars of restoration to stream bank stability and instream fish passage and will continue to work on migration corridors within our jurisdiction to improve habitat. Restoration projects include; riparian fencing, planting, reconfiguring hundreds of miles of streams, culvert replacements, decreased road erosion with the construction of rolling dips, and on irrigation ditches, fish screens have been installed." (WCNRMP p. 43)*

"Strategy 1.1.6: Condition forage on the wildlife area to be of quality and quantity such that wildlife are incentivized to utilize the MRWA for regional and local movements at strategic times of the year (see Strategies 2.1.3, 2.1.7, 2.1.8, 2.1.9, 2.2.1, 2.2.2, and 2.2.6)."
WC COMMENT: We support following these standards listed in the Wallowa County Natural Resource Management Plan.
"Standard Gra-S1.4: Include wildlife, recreation stock, and outfitter and guide forage use along with permitted use when setting range management objectives." (WCNRMP p. 78)
Mud Creek-Grande Ronde River Watershed - *"On public land, use timber harvest, thinning and prescribed burning to select for wildfire-resistant trees and improve forage for wildlife and livestock." (WCNRMP p. 57)*
Lower Joseph Creek Watershed - *"Harvest timber, thin and use prescribed fire to select for fire-adapted species and improve forage quality for ungulates." (WCNRMP p. 61)*

Page 14/15
"Strategy 1.1.7: Collaborate with the USFS Wallowa-Whitman National Forest, Vale District BLM and ODF to initiate cross-boundary 15 restoration initiatives that maintain and promote landscape scale connection, restoration and management actions (see Goal 2)."
WC COMMENT: The 2017 Wallowa County Community Wildfire Protection Plan and the 2026 revision, as well as direction from the Northern Blues Forest Collaborative and the Northern Blues Restoration Partnership all support cross-boundary work, meaning fuels reduction and stream restoration across property boundaries and jurisdictions to create landscape-scale, ecosystem management with positive impacts on all resources.

Page 15
"Strategy 1.2.2: Within the MRWA boundary, implement restoration projects on the mainstem Minam River and tributaries that increase the channel width-to-depth ratio, floodplain connectivity, and lower water temperatures to encourage usage by native migratory fish species (see Objective 2.3)."
WC COMMENT: We support continued flood-plain reconnection restoration on Wallowa County's rivers and streams as these waterways are essential habitat for fish and aquatic species as well as wildlife and human use for homes, farms and industry.

"Strategy 1.2.3: Promote aquatic habitat connectivity within MRWA tributaries by assessing and removing man-made barriers to movement, through road obliteration and/or culvert replacement where appropriate (see Objective 2.3)."
WC COMMENT: We support culvert replacement and maintenance over road obliteration in most cases.
"GOAL: MAINTAIN LANDS TO REDUCE SOIL COMPACTION, EROSION, AND SEDIMENT 1 ENTERING LIVE WATER. (WCNRMP, p. 89)
– Guideline Soi-G1.2.3: Maintenance and drainage:
Pull all culverts if a road is closed and not maintained.
Pull all culverts on obliterated roads. (WCNRMP, p. 90)
15. Use an adequate number of relief culverts, water bars, or dips to prevent active erosional features from appearing on the road, and direct the outlet onto a suitable substrate (and/or filter strip) to minimize erosion down slope of the road." (WCNRMP, p. 90)

Page 16
"With an ecosystem approach, management is intended to benefit as many species as possible that reside or migrate through the MRWA."

WC COMMENT: *Addressing Water Quality and Quantity*
Where habitats have been impacted by past land-use, or where habitats are not fully functioning, an active management approach may be considered., (WCNRMP p. 38)

"Where habitats have been impacted by past land-use, or where habitats are not fully functioning, an active management approach may be considered."
"Management practices such as fuels treatments and selective thinning improve forest health while strategic grazing improves plant vigor and increases nutritive values. Other active management techniques include aquatic and riparian restoration to promote habitat connectivity, while active treatment of invasive species protects biodiversity, restores healthy plant communities that improve water quality and quantity. These actions and tools not only protect and enhance habitats, but by partnering with professionals and contractors to accomplish work, also benefit local communities and economies."
WC Comment: ***GOAL: MANAGE FORESTED VEGETATION TO MAINTAIN AND/OR ENHANCE 1 FORESTED WATERSHED CONDITIONS.***
Standard For-S1.2: Silvicultural treatment activities shall maintain a viable and healthy ecosystem, referencing the historic range of variation in stand structure and seral stage for different biophysical environments, as well as future ranges dictated by changing environmental/climatic conditions. (WCNRMP p. 75)

Page 17/18
"Therefore, active forest management will serve as a surrogate to natural wildfire to accomplish objectives while recognizing current limitations and social tolerance."
"Active forest management will include a suite of forest health applications including pre-commercial thinning, commercial harvest, tree planting, and prescribed burning to protect and enhance forest stands throughout the wildlife area."
WC Comment: ***Objective For-O2: Silvicultural treatments may include but not limited to: Uneven aged management, single tree selection, group selection, prescribed natural fire, management-prescribed fire, commercial thinning, pre-commercial thinning, salvage, sanitation cutting, and even-aged management: pre-commercial thinning, commercial thinning, seed tree, shelterwood preparatory, shelterwood seed, shelterwood removal, clear cut, and irregular shelterwood. (WCNRMP p. 75)***

Page 18
"Thinning overstory canopy to 20-40% cover provides the greatest benefit to mule deer and elk, and benefits can last for approximately 15 years. In addition, more intensive timber harvest also has shown to provide similar benefits to elk and can last approximately 25-30 years. Strategies 2.1.1, 2.1.2, 2.1.3, 2.1.4."
WC Comment: ***"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." (WCNRMP p. 76)***

Page 19
"Strategy 2.1.5: Diversify age structure, increase spacing, clumping, and forest openings across 4,500+ acres of dry mixed-conifer stands to benefit forest health, resiliency, and ecosystem function. Within this forest type, this strategy will pay special attention to enhance habitat complexity that features hardwood pockets, riparian areas, meadows, and shrub patches."
WC Comment: ***"Reduce the risk of uncharacteristic wildfire, drought stress, and insect outbreaks by restoring forest structure and composition with timber harvest and prescribed fire. (WCNRMP p. 36***

Improve forest structure to store water in the snowpack." (WCNRMP p. 38)
"Standard Rip-S4.3: Manage fire risk reducing fuel loads to no more than 35 tons per acre." (WCNRMP p. 84)
"Standard Rip-S4.4: Aggressively treat forest stands adjacent to riparian buffers to reduce fire intensity when fires approach riparian areas." (WCNRMP p. 84)

Page 20

"Strategy 2.1.8: Reduce fine and woody fuels while increasing plant nutrition, vigor, and desired cover values by utilizing prescribed fire as a tool for native vegetation enhancement and manipulation."
WC Comment: ***"Objective For-O3.1: Where applicable, reintroduction of fire into the ecosystem to protect and maintain diversified stand structures across the landscape." (WCNRMP p. 76)***

"Management of grasslands in this manner provides abundant, palatable forage and cover for all wildlife. As such, prescribed livestock grazing will continue to be utilized as a fundamental tool to promote desirable forage conditions for wintering big game populations."
WC Comment: ***Livestock grazing controls fine fuels and reduces fire risk. (WCNRMP p. 36)***

"Management actions such as grazing, noxious weed suppression, and planting can help maintain grassland structure where other natural disturbances such as fire are not practical or desired."
WC Comment: ***"Objective Gra-O1.1: Manage grassland to maintain and/or enhance watershed conditions. – Guideline Gra-G1.1.1: Emphasize enhancement of native vegetation. – Guideline Gra-G1.1.2: For projects planned using NEPA, analyze effects and management of both wildfire and prescribed fire in conjunction with domestic livestock grazing to achieve grassland goals, objectives, standards, and guidelines." (WCNRMP p. 77)***

Page 21

"Strategy 2.2.1: Condition ungulate forage, maintain biodiversity, and mitigate effects of catastrophic wildfire by utilizing a deferred, rest rotation grazing program as a management tool."
"Strategy 2.2.2: Develop a strategic grazing management plan that emphasizes the benefits of conditioning forage for wildlife, and that includes range monitoring and associated adaptive management."
WC Comment: ***"Guideline Gra-G1.1.2: For projects planned using NEPA, analyze effects and management of both wildfire and prescribed fire in conjunction with domestic livestock grazing to achieve grassland goals, objectives, standards, and guidelines." (WCNRMP p. 77)***

"Strategy 2.2.5: Suppress invasive plant species and noxious weeds by utilizing Integrated Pest Management (IPM). Noxious weed control efforts will entail surveying, monitoring, and treating infestations utilizing best management practices and techniques."
WC Comment: ***"Objective Nox-O1.1: Use all feasible means to eradicate, control, contain, or otherwise reduce negative impacts of noxious weeds." (WCNRMP p. 86)***

"Strategy 2.2.6: Enhance plant communities, species diversity, richness, abundance, and/or cover values by planting native and other desirable grass and shrub species within appropriate habitat types."
WC Comment: ***Replant native and/or desirable non-native vegetation. (WCNRMP p. 86)***

"Strategy 2.2.7: Implement prescribed fire projects for native vegetation enhancement and manipulation by reducing fine and woody fuels."
Reduce the risk of uncharacteristic wildfire, drought stress, and insect outbreaks by restoring forest structure and composition with timber harvest and prescribed fire. (WCNRMP p. 36)

Page 22
"In addition, and most significantly, the shallow channel and lack of shading cause water temperatures to reach lethal levels for many fish species."
WC Comment: Do we have evidence of fish kill due to "lethal temperature levels" in the Minam?

Page 22/23
"Where appropriate, restoration actions will encourage the creation and maintenance of beaver modified habitat that encourages floodplain connectivity and subsurface flow."
WC Comment: Throughout the Wallowa County Natural Resource Management Plan's Basin Briefs section that identifies conditions, challenges and opportunities in 20 Wallowa County Watersheds, we encourage the use of beaver dam analogues and reintroduction of beavers WHERE AND WHEN APPROPRIATE in order to not negatively impact adjacent farming and roads.

Page 23
"Strategy 2.3.6: Control invasive plant species and noxious weeds within riparian habitats by utilizing Integrated Pest Management (IPM). Noxious weed control efforts will entail inventorying, monitoring, and treating infestations utilizing best management practices and techniques within these habitat types."
WC Comment: *"Standard Rip-S1.3: Prevention of invasive plant introduction, establishment and spread will be addressed in all planning including, but not limited, to watershed analysis; roads analysis, fire and fuels management plans, Burned Area Emergency Recovery Plans, emergency wildland fire situation analysis, wildland fire implementation plans, grazing allotment management plans, recreation management plans, vegetation management plans, and other land management assessments." (WCNRMP p. 83)*

Page 24
ODFW will use existing knowledge of historic recreational use and open interactions with the public to better understand desired opportunities.
WC Comment: By what methods?

Hunting, angling, wildlife watching, and hiking activities, amongst others, will be supported by allowing public access during key seasons, where those activities are balanced with wildlife and habitat protection. A key component of recreation management will be enhancing and maintaining access points at several locations on the MRWA.
WC Comment: Is access limited to walk-in and horseback only?

Page 25
"Strategy 3.1.2: Promote upland game bird and trapping opportunities by allowing public access outside of annual winter range closures from December 1st through March 31st to protect vulnerable wildlife."
WC Comment: Curious how this will be promoted and how closures will be enforced. Oregon State Police is mentioned, will they be patrolling within the wildlife area?

Page 26

"Strategy 3.2.1: Maintain five points of access and up to 62 miles of primitive road for walk-in access and administrative use."

WC Comment: Besides the access to the "trailhead" to the Minam Wildlife Area at the bottom of the Minam Grade and the road at the top of the Minam Grade, where will these access points be located? CHECK APPENDICES

"Strategy 3.2.6: Enhance and maintain the Minam River Trail #1673 for year-round access from the Minam State Park to USFS Eagle Cap Wilderness boundary. Strategy 3.2.7: Identify funding and partners for developing year round access to the Minam River Trail #1673 through an equestrian suspension bridge across the Minam River."

WC Comment: How do you maintain year-round access and close it for three months at the same time?

"MRWA has approximately 20 miles of boundary and pasture fencing associated with the current grazing program. With that, the MRWA contains 90+ ponds/stock water developments, in addition to numerous natural springs and seeps. All the water resources located on MRWA are traditionally used by wildlife and livestock to aid in sufficient distribution across the landscape."

WC Comment: Are these boundary fences with the USFS and if so, are they necessary?

ODFW does not have plans to construct new on-site facilities (office or shop space).

WC Comment: Why not use space at the Minam Park or on the BLM property?

Page 26/27

"Strategy 4.1.1. Fund operations of the MRWA through an annual budget that is managed in a balanced manner. 28 Strategy 4.1.2. Maintain adequate staffing and administrative oversight to carry out provisions within this plan."

WC Comment: The state is facing severe budget cuts. Consider partnering with other agencies, organizations and volunteers like the WMHCTA.

Page 27

9+ miles of the historic Minam River Trail (FS Trail #1673)

WC Comment: Is ODFW going to maintain a USFS trail?

"Strategy 4.1.5: Allow for administrative access, emergency response and wildland fire management while protecting wildlife habitat values by maintaining and managing 62 miles of administrative roads. Work will entail improving connectivity of roadways through grading, graveling, pruning, thinning, hand-piling, and prescribed burning. To accomplish goals 1 and 2, work may also include road obliteration."

WC Comment: What roads will be obliterated?

Page 28

"Strategy 4.1.9: Identify and implement catastrophic fire protection/reduction projects for areas of key habitats and/or habitat attributes. These efforts will entail pruning, thinning, prescribed burning, and hand-piling vegetation as well as improving emergency response access to applicable areas."

WC Comment: *"Reduce the risk of uncharacteristic wildfire, drought stress, and insect outbreaks by restoring forest structure and composition with timber harvest and prescribed fire." (WCNRMP p. 36)*

Page 30

WC Comment: All projects that move dirt should be reviewed by the Wallowa County Natural Resource Advisory Committee.

Partnerships: Partnerships with federal, state and local agencies

WC Comment: Wallowa County Natural Resource Technical Advisory Committee should review all projects on the Minam River Wildlife Area and the NRAC Standing Committee should be updated periodically on the area's management.

"Adaptive Management/Monitoring: This plan provides for adaptive management of the MRWA. Adaptive management is a flexible approach to long-term management of resources that is directed by the results of ongoing monitoring activities and latest data. Management techniques and strategies are regularly evaluated considering monitoring results, new scientific understanding, and other new information. These periodic evaluations are used over time to adapt both management techniques and strategies to better achieve the wildlife area goals."

WC Comment: *"The Plan underscores the continued need for the collaborative, consensus-based, ridgetop-to-ridgetop approach to adaptive management that is the legacy of the Salmon Plan." (WCNRMP p. 10)*

As a newly established wildlife area, the MRWA has many information gaps to fill. Some baseline information exists, largely big game census data for the Minam Wildlife Management Unit (WMU) along with fisheries information for the Wallowa and Minam Rivers and their tributaries. However, this information is intended for a much larger scope than the MRWA. Wildlife area personnel will work directly with ODFW district and divisional staff to collect fisheries and wildlife data specific to the MRWA and identify additional monitoring and inventories necessary for successful management.

WC Comment: Be sure to include Nez Perce Tribe Fisheries, co-managers of Wallowa County's waterways.

Sincerely,

Commissioner Lisa Collier

Commissioner Mike Hayward

Commissioner John Hillock

Wallowa Mountains Hells Canyon Trails Association
401 NE First Street, Suite A
Enterprise, OR 97828
www.wmhcta.org

October 16, 2025

To Whom It May Concern:

Wallowa Mountains Hells Canyon Trails Association is a 501(c)3 non-profit volunteer group dedicated to maintaining and improving backcountry trails in NE Oregon. We work primarily on US Forest Service trails, but also maintain several trails on other land ownerships. We have worked on the Lostine Wildlife Area trail and would be interested in helping to maintain trails on the new Minam River Wildlife Area.

We have reviewed the Minam River Wildlife Area Management Plan and would like to go on the record as approving of Goal 3 as written in the Plan. Our Board of Directors has asked me to send this letter supporting Strategy 3.2.6 of extending and keeping open the Minam River Trail from Highway 82 to the USFS boundary so that hikers and equestrians can travel the entire length of the Minam River. We would also like to extend our support of Strategy 3.2.7 of building a bridge near Minam to eliminate the need to ford the river to access the Minam River Trail.

Thank you for this opportunity to give our feedback.

Sincerely,

Mike Hansen
Executive Director
Wallowa Mountains Hells Canyon Trails Association
541-398-8225
https://www.wmhcta.org/

ROCKY MOUNTAIN ELK FOUNDATION

October 16, 2025

Oregon Department of Fish & Wildlife
Attn: Chris Vogel and Dan Marvin, Wildlife Division
Submitted via email: minam.plan@odfw.oregon.gov

RE: Minam River Wildlife Area Management Plan

The Rocky Mountain Elk Foundation (RMEF) is proud to have been a partner in the story of the Minam River Wildlife Area (MRWA) and appreciates the opportunity to engage in management planning. RMEF supports the management approach to maintain and protect landscape level connectivity, conserve key habitats, and sustain ecological functions that support numerous endemic species. Using active management principles will help achieve the goal of enhancing historic winter range for Rocky Mountain elk and other wildlife. RMEF offers the following comments on the MRWA Management Plan:

Inclusion of Big Game and Big Game Habitat in Planning Efforts

Healthy, free-roaming big game herds contribute to and are intermingled with the social well-being, ecological integrity, cultural, and economic goals of the area. Elk and other big game serve 'distinct roles and contributions' to multiple user types (wildlife viewing, hunting, etc.) and the management plan plays a significant role in supporting future big game populations. RMEF appreciates recognition of big game species as important in providing economic and cultural value.

Coordination with Partners and Stakeholders

RMEF works closely with each state's wildlife agency, federal agencies, and other stakeholders to achieve collaborative conservation successes. In setting new goals and objectives in management plans, RMEF encourages coordination with various partners to include forest vegetation, timber, wildlife habitat, and recreation goals that help meet big game management plan objectives. Specifically, RMEF supports Strategy 1.1.7 to, "*Collaborate with the USFS Wallowa Whitman National Forest, Vale District BLM and ODF to initiate cross-boundary restoration initiatives that maintain and promote landscape scale connection, restoration and management actions.*"

Science-based Management

RMEF recommends use of the best available science to guide the management plan. Past and recent research has identified several challenges to North America's elk country, including unnaturally dense forests, invasion of weeds, lack of dependable water sources, and many others. RMEF often leans on the past 25+ years of research from the Starkey Project and other studies that have laid the groundwork for managing healthy elk habitat (Wisdom 2005). More

recent research on ungulate migration (Kauffman et al. 2020, 2022), nutrition (Cook et al. 2013, Rowland et al. 2018), and elk security (Wisdom et al. 2018, Miller et al. 2020) continue to build on this foundation. RMEF recommends that recent research on the benefits of actively managed landscapes, impacts of high use recreation, wildlife connectivity, etc. continue to inform plan components.

Management Plan Goal 1: Protect and enhance connectivity at a regional and local scale in a manner that supports critical ecological functions for fish and wildlife species.

Big game habitat connectivity is increasingly threatened by habitat loss and degradation, as well as development activities. RMEF appreciates plan components that recognize the importance of big game movement corridors and include management direction for conserving corridors across large landscapes. Plan components that bring attention to removing and/or improving fencing across the Wildlife Area to help conserve big game travel corridors are critical. Specifically, RMEF supports Strategies 1.1.3 and 1.1.4.

Management Plan Goal 2: Actively manage MRWA for high-quality and resilient terrestrial and aquatic habitat that supports diverse fish and wildlife species.

The ecological integrity of forest ecosystems is dependent on maintaining vegetation diversity. With more than 50% of the Wildlife Area in forest, RMEF supports a focus on a more heterogeneous forest structure, restoring more frequent fire, increased reforestation, and sustaining the existing late successional stage, all with an adaptive management framework given changing conditions and new information. Specific to this goal, RMEF supports Strategies 1.1.5, 2.1.5, and 2.1.9.

RMEF is very supportive of active management to benefit wildlife habitat and fire risk management. Executing active forest management techniques such as prescribed burns, thinning, and other habitat treatments helps prevent severe wildfires and assists in long-term ecosystem resilience. In addition, managing natural ignitions can help achieve fuel and vegetation goals. Specifically, RMEF supports Strategy 2.1.2.

Early seral forests provide important habitat for elk and other wildlife and are often achieved following disturbance. RMEF supports the use of mechanical thinning and prescribed burning to encourage growth of grasses, forbs, young shrubs, and trees that provide critical forage and cover for elk and other species. Specifically, RMEF supports Strategy 2.1.3.

Aspen stands represent a unique ecosystem, providing a variety of services. With an expectation of continued aspen decline, RMEF supports a focus on restoring prescribed fire treatments, removing conifers, and excluding herbivores in clones that are impaired or in decline. While temporary fencing can be an effective approach to protecting aspen stands, it can inadvertently remain on the landscape much longer than anticipated. Instead, RMEF recommends leaving cut conifers scattered at the base and around suckering aspen stands to prevent herbivory. Specifically, RMEF supports the aspen enhancement activities outlined in Strategy 2.1.6.

Noxious and invasive species are slowly replacing native forage for big game and impacting forest resources. RMEF encourages controlling and reducing invasive weeds through an integrated weed management approach (biological, mechanical, chemical, and outreach). Early detection and rapid response remain a critical component of effective weed management (Westbrooks 2004). Native plant communities provide the highest nutritional value for wildlife; RMEF encourages the use of native plant seed mixes in all restoration work. Specifically, RMEF supports the invasive and noxious weed IPM referenced in Strategy 2.2.5.

Shrubland and grassland habitats provide crucial resources for wintering big game. RMEF supports plan components that aim to reduce encroaching conifers in these systems with reseeding when necessary. Specifically, RMEF supports Strategy 2.2.7.

Managed livestock grazing can improve the health of rangelands and forest meadows if the system is designed with habitat values for elk and other wildlife in mind. An effective range management program between the agency and permittees is essential to maintaining the economic base and lifestyle that have helped keep private lands across elk country as working ranches. RMEF encourages grazing management systems and techniques compatible with maintaining desired levels of elk and other wildlife. Specifically, RMEF supports grazing systems and methods outlined in Strategies 2.2.1, 2.2.2, and 2.2.3.

RMEF appreciates that management activities on the MRWA will impact several individual wildlife species' management plans, including elk, mule deer, wolves, etc. RMEF supports managing predator populations through hunting and trapping with regulations adopted by respective state wildlife agencies.

Management Plan Goal 3: Provide access and a variety of recreational opportunities to a diverse array of users, in a manner compatible with Goals 1 and 2.

For many hunter-conservationists, public lands provide the best opportunity to pursue their hunting heritage. These activities deliver economic benefits for local communities, as well as cultural and social benefits. RMEF appreciates recognition of the importance of hunting, fishing, trapping, shooting sports, and other non-consumptive recreation as contributing to local economies and the well-being and quality of life of public land users. The plan should provide for the continuation of these activities as a valid and vital component of the recreation spectrum.

With dramatic increases in public land use, RMEF recommends inclusion of past and recent research on the potential impacts of recreation to elk and other wildlife (e.g., Wisdom et al. 2018, Marion et al. 2020, Miller et al. 2020, Dertien et al. 2021, and others). Specifically, research from the Starkey Project has done much to quantify effects of roads, trails, and associated motorized (Wisdom et al. 2005) and nonmotorized traffic on elk (Wisdom et al. 2018). RMEF supports a balanced approach in providing access for those seeking varied experiences. However, RMEF also recommends inclusion of plan components that provide seasonal protection (during critical times) for elk and other wildlife from impacts of recreation (via roads, trails, and associated motorized and nonmotorized traffic). Timing restrictions should be based on the best available science as well as site-specific factors (topography,

available habitat, etc.). Specifically, RMEF supports the management status quo and Strategy 1.1.2 to "*Enhance security for ungulates and other wildlife during critical periods…" see Strategy 4.1.7.*

Identified as a significant barrier to maintaining hunting and angling participation, access to public land plays a critical role in ensuring the future of our hunting heritage (Eliason 2020). RMEF recommends consideration of public land access needs in planning efforts, including those that create or maintain access points to lands that are important for managing wildlife. Specifically, RMEF supports strategy 3.2.1, *"Maintain 5 points of access and up to 62 miles of primitive road for walk-in access and administrative use."* RMEF also specifically supports Strategy 3.2.2, to *"Support visitors at access points by enhancing and maintaining amenities where appropriate (parking, vault toilets, picnic areas, horse handling facilities, etc.)."*

RMEF appreciates the opportunity to comment on the MRWA Management Plan. We look forward to working with you on implementation.

Sincerely,

Jenn Doherty
Managing Director of Mission Operations

From: ODFW Minam River
To: Minam Plan * ODFW
Subject: Minam River Wildlife Area draft management plan [#2]
Date: Thursday, October 16, 2025 5:01:06 PM

Name	Morgan Olson
Email	morganroyolson@gmail.com
Indicate page/section of draft plan that you are commenting on (not required):	Whole Plan

Enter comments here:

October 16th 2025
Comments regarding the Minam River Wildlife Area Management Plan

To Whom It May Concern,
To start off I would like to thank ODFW and its partners for putting this acquisition together and getting everything lined up to make this a reality. This is truly a very special piece of property both historically as well as for access and wildlife. I would also like to thank ODFW for keepings this property a working landscape that recognizes the value of grazing and timber management and how it coexist with wildlife. Timber and grazing are critical to both Union and Wallowa County citizens and its economy…all the while benefiting wildlife.
The following are suggestions to the plan…
• Keep the wildlife area open through December 31st. This will benefit the big game hunting seasons for youth as well as the game bird season. Since there is no vehicle access, the disturbance would be very minimal if any. In addition if folks are visiting the area for winter break, this would provide another area for non-consumptive recreation.
• Keep logging and grazing active on the landscape.
• Allow year round camping along the Minam River for folks accessing the wilderness.
• In the event a bridge is installed at the town on Minam, keep the current access open as well.
• Implement a predator management plan to benefit game and cattle.
In the event there is additional information or input needed, please reach out with questions. I would also be willing to participate in additional planning for the Minam Wildlife Area as well as any projects.
Thank you,
Morgan Olson
67494 Market Lane
Cove, OR 97824
541-786-1283
morganroyolson@gmail.com

OREGON HUNTERS ASSOCIATION
Protecting Oregon's Wildlife, Habitat and Hunting Heritage
P.O. Box 1706, Medford, OR 97501 • (541) 772-7313
oha@oregonhunters.org • oregonhunters.org

October 16, 2025

RE: Oregon Hunters Association Comments and Input on the Draft Minam River Wildlife Area Management Plan

The Oregon Hunters Association (OHA) has been a strong supporter and advocate for the acquisition of additional lands for the Minam River Wildlife Area (MRWA). This is a great example of a public/private partnership that will benefit wildlife, sportsman, wildlife enthusiasts, and the local economy. This special area offers a number of values for both fish and wildlife and the sportsman that use the area. Current and future management of the area will be critical for maintaining and enhancing the habitat the area provides and the hunting opportunities it affords.

OHA offers the following input on the Draft Minam River Wildlife Area Management Plan (Plan).

General Comments on the Plan

The Plan follows the traditional review and update framework/timing that the Oregon Department of Fish and Wildlife (ODFW) uses on other wildlife area plans. Essentially a short review at five years, and a more detailed review and update at ten year increments. Given the significance and magnitude of the MRWA, OHA suggests that ODFW undergo a more thorough review/update at the first five year interval, rather than a short review. There are a number of factors, from public use, to funding, to habitat work that are planned in the initial stages of the Plan. Ensuring that ODFW has enough support and capacity, and that public use is compatable with the work will be critical in meeting the Plan's goals. OHA also recommends that ODFW consider using an advisory committee for engagement and review of priorities throughout the early stages of the Plan implementation.

Specific Comments and Input the Plan.

Seasonal closures

OHA supports the general strategy to enhance security for ungulates and other wildlife during critical periods by closing the MRWA to most public access during winter months (currently planned for 12/1 through 3/31). After reviewing this and getting input from local OHA representatives, OHA would like to see access that allows for hunting through December for the youth elk hunt (Minam Unit Youth 260T). We believe disturbance from this hunt (10 tags in 2025) will likely have minimal impacts to wintering ungulates and other wildlife on the MRWA.

A question OHA has is how this closure be enforced, particularly with the Minam River trail being open year around?

Projects on the area

The Plan discusses a number of management actions to restore, enhance and maintain habitat on the MRWA. OHA supports these actions and would offer that prioritization be given to protecting fresh water sources (springs, ponds, streams), primarily from livestock, through the use of wildlife friendly fencing around these sources and riparian areas for example.

Given the geographic location of the MRWA and its proximity to federal lands, the Plan should include language pertaining to collaboration with USFS Wallowa Whitman National Forest to initiate cross-boundary implementation of forest management projects that increase the prevalence of early seral vegetation communities on adjacent land ownership. This will increase ungulate forage and ultimately help retain wild ungulates on public lands.

Funding

The draft plan speaks to a broad variety of habitats, species, and public uses. It repeatedly considers habitats that support sensitive, threatened, and species of concern that will receive special management consideration. The Plan seeks to promote utilization of the MWRA for hiking, wildlife watching, photography, viewing, and all other compatible uses. It goes on to address this use by enhancing and maintaining access points and infrastructure that supports these recreational opportunities and the maintenance of these amenities where appropriate (including parking, vault toilets, picnic areas, horse handling facilities, etc.).

While OHA can support this, it must be pointed out that the Draft Plan states:

> ***Funding:*** *Operation and maintenance of the MRWA is currently funded through USFWS's Office of Conservation Investment (Wildlife Restoration Program). Authorized by the Pittman-Robertson Act in 1937, funds from manufacturer taxes on ammunition, firearms, and archery equipment go toward projects to restore, conserve, manage and enhance wild birds and mammals and their habitats.*

While other sources of funding are expected from grants, grazing fees, and intermittent timber receipts, there is no denying that **the primary funding is all from hunters and shooters**. ODFW must actively and assertively seek to strongly align priority work and objectives with the source of the funding AND seek other sources of funding for broad scale habitat, management, and public uses.

Habitat work specifically designed and implemented for non-game species should have appropriately matched funding. Wildlife area parking permits should be required for all users.

Even planned stand management activities will likely be limited in their profitability and need additional funding due to low cost-benefit ratios of the commercial resources. Will hunters be considered the sole source of funding for this work?

Camping on the MRWA

OHA Supports developing administrative rules that allow for overnight, primitive, and remote camping in the interior of the MRWA to support backcountry hunting opportunities. Further, OHA supports the draft language in Goal 3 pertaining to monitoring public use for adaptive management purposes. ODFW should monitor the quantity of camps, and survey hunters to

ensure these potential camping opportunities are not disturbing wildlife and not significantly impacting hunt quality during hunting seasons. ODFW should consider development of a map or written description that indicates what areas should be closed to camping.

Other comments

OHA supports the Draft Plan language on invasive weed control efforts that entail surveying, monitoring, and treating infestations utilizing best management practices and techniques. ODFW should also consider employing other commonly used practices like "weed washing" equipment before using it on the MRWA and only allowing certified weed free feed for horses, mules, donkies and lamas.

Information on public use and hunter and angler use on the MRWA will be critical to understand as the MRWA becomes more popular. ODFW should employ a self check-in system similar to other state wildlife areas (EE Wilson for example) to gather information on type of use, hunter harvest, and effort.

OHA supports the implementation of a year-round restriction on motorized access on the MRWA and allowing for motorized access for administrative purposes only. Our chief concern will be how ODFW plans to enforce this with e-bikes.

Lastly, OHA is strongly supportive of the use of managed grazing on the MRWA. Use of prescribed grazing has proven effective in other state wildlife areas to condition forage and even assist with invasive plant control. We are eager to see how the use of opportunities to incorporate virtual fencing applications will work.

Thank you for the opportunity to offer our input and perspectives.

Mike Totey
Conservation Director
Oregon Hunters Association

From: ODFW Minam River
To: Minam Plan * ODFW
Subject: Minam River Wildlife Area draft management plan [#3]
Date: Friday, October 17, 2025 3:45:14 PM

Name	Oregon Hunters Association Union/Wallowa County
Email	morganroyolson@gmail.com
Indicate page/section of draft plan that you are commenting on (not required):	Entire Plan

Enter comments here:

The following comments from the Union/Wallowa County Chapter of Oregon Hunters Association representing 300+ members.

• Keep the wildlife area open through December 31st. This will benefit the big game hunting seasons for youth as well as the game bird season. Since there is no vehicle access, the disturbance would be very minimal if any. In addition if folks are visiting the area for winter break, this would provide another area for non-consumptive recreation.
• Allow year round camping along the Minam River for folks accessing the wilderness.
• Implement a predator management plan to benefit game and cattle.

If further information is needed, please reach out to Morgan Olson Chapter President - 541-786-1283

GREATER HELLS CANYON COUNCIL

October 17, 2025

Oregon Department of Fish and Wildlife
4034 Fairview Industrial Drive SE
Salem, Oregon 97302
Attn: Minam River Wildlife Area planning team

Re: Comments on Minam River Wildlife Area draft management plan

Dear Minam River Wildlife Area planning team,

Thank you for the opportunity to comment on the draft management plan for the new Minam River Wildlife Area! We were very happy to support this project and are excited to see basically the entirety of the Minam River and its tributaries now in public ownership. This acquisition will provide long term security for a key wildlife corridor and an incredibly important river system in our region. On behalf of our staff, board, and membership, we'd like to extend a heartfelt thank you to ODFW staff and all other partners who made this acquisition possible.

You will find some limited comments on the draft management plan below. We look forward to continuing to engage with the agency in discussions around management, monitoring, and project implementation on the MRWA, and are eager to help with volunteer and citizen science opportunities.

Goal 1: Protect and enhance connectivity at a regional and local scale in a manner that supports critical ecological functions for fish and wildlife species.

We appreciate that the vision for the MRWA focuses on landscape level connectivity and are glad the agency is considering connectivity at multiple spatial and temporal scales. We also appreciate the focus on diverse wildlife species and habitats. Generally speaking, we are supportive of actions that aim to improve terrestrial and aquatic habitat connectivity, especially removing man-made barriers, culvert replacement, road obliteration, removing fencing, and use of wildlife-friendly fencing. Please let us know if there are opportunities to plan or collaborate with other local partners on connectivity projects (fence pulls, etc.).

Goal 2: Actively manage MRWA for high-quality and resilient terrestrial and aquatic habitat that supports diverse fish and wildlife species.

Thanks to ODFW staff for including such detailed information in the appendices about vegetation and species in the MRWA.

Our primary concern for goal 2 surrounds balancing fuels/forest stocking objectives with wildlife needs, especially in the ~29% of the MRWA that is mixed-conifer forest. As the draft

plan outlines, these forests have "an abundance of resource values" for game and non-game species, and should provide different services to wildlife than nearby ponderosa pine woodlands. Balancing forest composition and fuels goals with wildlife needs (e.g. habitat for species sensitive to logging and/or species associated with late seral systems) can be tricky. On federal lands, it is unfortunately common to see wildlife and silvicultural goals pitted against each other. How will the agency balance these at times competing priorities? Will there be project design criteria that ODFW designs that ODF and/or contractors will follow?

Strategy 2.1.5 mostly speaks to adding heterogeneity in dry-mixed conifer stands by various methods that involve removing trees. While we don't necessarily disagree with these methods, we would like to see some further consideration given to maintaining complex structure for the species that need it, and to recruitment and protection of large diameter trees across the MRWA (beyond the places stated in 2.1.10).

Regarding Objective 2.2, we would encourage the agency to take whatever measures are necessary to reduce competition for forage resources, and to build this into the monitoring and adaptive management plans. We are very supportive of actions to restore unique habitats (e.g. aspen, shrubland, etc.). Please let us know if there are opportunities to plan or collaborate with other local partners on restoration projects (weed pulls, etc.).

Regarding Objective 2.3, we are very supportive of work to improve channel complexity and connectivity, lower stream temperatures, increase shading, and generally improve instream and streamside habitat on the Minam and its tributaries. Please let us know if there are any opportunities for our Stewardship Manager (Ian Wilson) to assist in any beaver-related habitat activities.

We have two outstanding questions regarding Goal 2:

- With mainly walk-in access, this may not be an issue, but we are curious if the agency has considered if increased use will necessitate more security habitat or cover.
- How does the agency intend to handle wildfire in the MRWA?

Goal 3: Provide access and a variety of recreational opportunities to a diverse array of users, in a manner compatible with Goals 1 and 2.

While our staff and membership will directly benefit from access to the MRWA, we are supportive of time-based or outright limitations on access as needed to meet wildlife goals. This sentiment applies broadly to the recreation and access strategies in the draft plan: our staff and membership appreciate the access and will gladly use any improved infrastructure, but we recognize that recreation is also a consumptive use and can come with ecological costs. We request that the agency complete a thorough analysis of possible impacts of increased recreation in the MRWA.

We do have a question regarding whether or not bicycles are intended to be a permitted use in the MRWA. It doesn't seem that they'd be covered by a year-round motorized vehicle

closure mentioned in Strategy 1.1.1 and 4.1.6. The draft plan and maps seem to imply that the area is meant for foot and equestrian access but that is not abundantly clear. Additionally, we have some concerns about unauthorized motorized use and wonder if the agency has given thought to additional deterrents beyond OSP presence.

Goal 4: Provide administration necessary to accomplish MRWA goals.

We appreciate that the local staff and draft plan have clearly given significant consideration to cultural resources and that there are plans to complete a comprehensive baseline cultural resource survey in the MRWA. Thank you.

Regarding partnerships and adaptive management/monitoring, please let us know if we can assist with citizen science work in the MRWA.

Conclusion

Thank you for the opportunity to comment on the MRWA draft plan. We look forward to working with you in the future!

Sincerely,

Jamie Dawson

Jamie Dawson, Conservation Director
Greater Hells Canyon Council
PO Box 607, Enterprise, OR 97828
541-963-3950
jamie@hellscanyon.org

Brian Kelly

Brian Kelly, Senior Advisor
Greater Hells Canyon Council
PO Box 607, Enterprise, OR 97828
541-963-3950
brian@hellscanyon.org

October 17, 2025

Dear ODFW,

Please accept these comments on the Minam River Wildlife Area Management Plan.

Thank you for your work to secure the Lower Minam River and establish the Minam River Wildlife Area (MRWA). This is a critical step for the conservation of the region and builds on decades of work by ODFW and Eastern Oregonians to protect the unmatched Minam River Country.

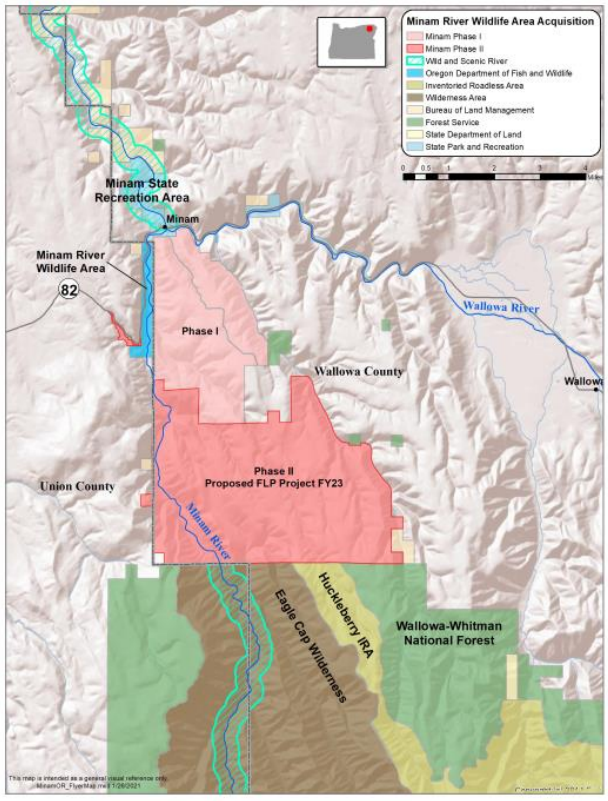
I am supportive of your efforts to promote resilience, improve wildlife habitat, protect clean water, enhance biodiversity, and maintain/enhance regional connectivity. I also strongly support the year-round motorized vehicle closure. I encourage ODFW to clarify that electric bikes are not allowed. And to make that language very clear so that there is no confusion.

I offer the following specific recommendations to the following strategies.

1. Pg 15 Objective 1.2: I recommend adding the following strategy:

Strategy: Collaborate with the USFS Wallowa Whitman National Forest to maintain administrative protections that promote connectivity between the Lower Minam Wildlife Area and the Huckleberry Mountain Inventoried Roadless Area.

Rationale: The Rocky Mountain Elk Foundation included the following map in one of the information documents on the Minam River Wildlife Area Acquisition. The map shows that in addition to providing connectivity with the Eagle Cap Wilderness, the phase II acquisition also provided connectivity with a large section of the Wallowa-Whitman National Forest and especially the Huckleberry Inventoried Roadless Area (IRA). Huckleberry is a very important IRA that extends all the way to the Lostine drainage. Currently, IRAs are threatened by recission of the roadless rule. If the Rule is rescinded, it would be good to have collaboration between ODFW and USFS to protect this valuable roadless landscape that directly adjoins the Lower Minam Wildlife Area. In addition to river and stream corridors, connectivity values along the fronts of mountains can be extremely important.



Here is a more detailed description of the Huckleberry IRA values.

Huckleberry Mountain

Huckleberry Roadless Area lies on the north flanks of the Eagle Cap Wilderness, some 8 miles south of the town of Wallowa. The Forest Service has previously identified Huckleberry for Recommended Wilderness. This roadless area spans a large boundary of the Eagle Cap Wilderness. Three Wilderness trailheads (Bear Wallow, Cougar Ridge, and Huckleberry Mt.) and trails (Huckleberry Mt. trail 1667, Bear Creek trail 1653, and Bear Wallow trail 1677) traverse through this roadless area to the Eagle Cap Wilderness. These trailheads are non-motorized and closed to bicycles.

Huckleberry Roadless Area (photo by David Jensen). The most important northern addition to the Eagle Cap Wilderness contains large areas of high-priority forests for protection.

Huckleberry is exceptionally important for its aquatic and wildlife values. There are several drainages within the area including major portions of Bear Creek, Little Bear Creek, Big Creek, and Deer Creek drainages. Streams offer spawning habitat for anadromous bull trout, and Snake River spring/summer Chinook Salmon are found in Bear Creek and the lower portion of Doc Creek. Huckleberry provides travel corridors for many wildlife species, habitat for Canada Lynx, and wolverine denning and foraging habitat. Other species that may be found in this area are mountain goats, pine martens, pacific fisher, white-tailed ptarmigan, Wallowa rosy finches, prairie falcons, and peregrine falcons. Huckleberry provides many avenues of escapement for elk and deer during hunting seasons.

2. Pg 19 Strategy 2.1.10

Recommendation: Modify Strategy 2.1.10: Protect trees with old growth characteristics within the Lower Minam Wildlife Area. ~~within the National Wild and Scenic Corridor, along the Minam River and tributaries.~~ This will enhance carbon sequestration in a manner aligned with ODFW's Climate Change Policy.

Rationale: As the management plan discusses, these lands were industrially logged. Old growth trees are likely well below historic levels. There is no reason to limit protection of old growth trees to these specific areas. Old growth trees are important in all habitats across the landscape. Science overwhelmingly supports protection of remaining old growth trees across the area for a variety of values.

Large-diameter snags and large, downed logs provide critically important wildlife habitat and account for a relatively high proportion of total snag biomass in temperate forests (Rose et al., 2001; Lutz et al., 2021). There is currently a significant deficit of large snags (dead trees) in western US forests relative to the minimum habitat needs of many native cavity-nesting wildlife species (Bell et al., 2021). Large hollow trees, both alive and dead, are the most valuable for denning, shelter, roosting, and hunting by a wide range of animals (Rose et al., 2001). In the Interior Columbia River Basin, grand fir and western larch form the best hollow trees for wildlife uses (Rose et al., 2001). Downed hollow logs serve as important hiding, denning, and foraging habitat on the forest floor (Bull et al., 1997; Bull et al., 2005).

Protecting trees with old growth characteristics would provide clarity to future management actions, and avoid needless dispute over how old growth trees should be managed. Just establish the precedent now. Protect all remaining old growth trees.

3. Pg 19 Add new strategy

Recommendation: Add Strategy: 2.1.11 Management actions will favor retention of large-diameter trees that will be the next generation of old growth.

Rationale: In any forest, the largest trees relative to the rest of the stand contribute disproportionately to ecological function such as increasing drought-tolerance, reducing flooding from intense precipitation events, altering fire behavior, redistributing soil water, and acting as focal centers of mycorrhizal communication and resource sharing networks (Bull et al., 1997; Brooks et al., 2002; Brown et al., 2004; Luyssaert et al., 2008; Lindenmayer and Laurance, 2017; Teich et al. 2022). Forests with large-diameter trees tend to have high tree species richness, and a high proportion of critical habitat for endangered vertebrate species, indicating a strong potential to support biodiversity into the future and promote ecosystem resilience to climate change (Lindenmayer et al., 2014; Buotte et al., 2020).

Protecting mature forests is powerful near-term integrated climate action. The climate crisis will continue to accelerate in the coming decades. We are already witnessing an alarming and unprecedented succession of climate extremes and widespread impacts to humanity and all life on Earth (Ripple et al., 2023). The actions we take now will have long-term impacts on future generations. A reduction in fossil fuel emissions is the single most important measure for mitigating climate change; however, logging is the second largest emitter of greenhouse gases to the atmosphere globally (IPCC, 2018) and the single largest carbon polluter in Oregon[1].

Protecting mature and old-growth forests is one of the most effective and strategic options we can take for managing atmospheric carbon dioxide and meeting urgent climate goals. But to be

[1] https://www.hcn.org/issues/50-11/climate-change-timber-is-oregons-biggest-carbon-polluter/

effective, protections must safeguard these forests from degradation. And such protections must recognize the targeted nature of restoration needs in frequent-fire forests.

Climate change provides no justification for logging mature and old-growth trees—quite the opposite. Large-diameter trees are a defining structural attribute of mature and old-growth forests and are key to the ability of forests to accumulate and store substantial amounts of carbon from the atmosphere (Luyssaert et al., 2008; Lutz et al., 2018; Mildrexler et al., 2020; Stephenson et al., 2014). Globally, studies have found that about half the aboveground carbon (AGC) is concentrated in a small proportion of large trees (1-5% of total stems) (Lutz et al., 2018; Mildrexler et al., 2020).

In forests of eastern Oregon large-diameter trees are relatively long-lived and most species including grand fir develop thick fire-resistant bark with age. Thus large-diameter trees enhance carbon stability because they are the safest long-term storage vault for AGC in the forest (Mildrexler et al., 2023). **These trees can live for hundreds of years, and the carbon stocks accumulated in these long-lived trees cannot be regained during the critical time period to meet climate goals. The carbon in large-diameter trees is irrecoverable (Noon et al., 2022).** We need this carbon kept in the forest and out of the atmosphere. Large-diameter trees impacted by natural disturbances such as wildfire retain much of their carbon because of low combustion rates (Harmon et al., 2022).

Global evaluations have shown that the rate of tree carbon accumulation increases with tree size (Stephenson et al., 2014). Stephenson et al. (2014) report:

> Here we present a global analysis of 403 tropical and temperate tree species, showing that for most species mass growth rate increases continuously with tree size. Thus, large, old trees do not act simply as senescent carbon reservoirs but actively fix large amounts of carbon compared to smaller trees; at the extreme, a single big tree can add the same amount of carbon to the forest within a year as is contained in an entire mid-sized tree.

Recognition of the importance of large-diameter trees in the global carbon cycle has led to management recommendations to conserve existing large-diameter trees and those that will soon reach large diameters (Lutz et al., 2018; Lindenmayer et al., 2014).

Mature forests will be the next old forests, and along with old forests, they will do the most to mitigate climate change. Allowing mature forests to age into old-growth forests is a major opportunity to increase carbon stocks (Moomaw et al., 2019).

Young forests store very little AGC compared to mature and old forests and are often conspicuous sources of carbon to the atmosphere. Luyssaert et al. (2008) states:

> In fact, young forests rather than old-growth forests are very often conspicuous sources of CO2 because the creation of new forests (whether naturally or by humans) frequently follows disturbance to soil and the previous vegetation, resulting in a decomposition rate of coarse woody debris, litter and soil organic matter (measured as heterotrophic respiration) that exceeds the NPP [Net Primary Productivity] of the regrowth.

In any forest, the largest trees relative to the rest of the stand contribute disproportionately to ecological function such as increasing drought-tolerance, reducing flooding from intense precipitation events, altering fire behavior, redistributing soil water, and acting as focal centers of

mycorrhizal communication and resource sharing networks (Bull et al., 1997; Brooks et al., 2002; Brown et al., 2004; Luyssaert et al., 2008; Lindenmayer and Laurance, 2017; Teich et al. 2022). Forests with large-diameter trees tend to have high tree species richness, and a high proportion of critical habitat for endangered vertebrate species, indicating a strong potential to support biodiversity into the future and promote ecosystem resilience to climate change (Lindenmayer et al., 2014; Buotte et al., 2020). Additional co-benefits include (but are not limited to):

4. Pg 21 Strategy 2.2.4

Recommendation to modify: Strategy 2.2.4: Promote uniform livestock distribution and limit impacts to riparian areas, springs, and seeps, by maintaining and developing off channel watering resources including ponds, troughs, solar operated wells and spring developments. In addition, utilize nutritional supplements on the landscape.

Rationale: Springs and seeps are specialized and fragile environments. The cold, clean water they provide supports botanically unique and sensitive plant communities. They create microsites, and increase biodiversity. They can help support connectivity. We don't have to continue repeating the mistakes of the past by developing springs for livestock to the detriment of water quality and sensitive plants. There are better ways to provide water for livestock.

I encourage for development of water resources that livestock can use while also keeping cattle out of springs and seeps as much as possible. Pg 27 states that "the MRWA contains 90+ ponds/stock water developments, in addition to numerous natural springs and seeps. All the water resources located on MRWA are traditionally used by wildlife and livestock to aid in sufficient distribution across the landscape."

As a frequent backcountry user and hiker, it is extremely disconcerting to come across springs that are fouled by cattle. We can do better for our water supply and sensitive plant communities.

5. Pg 23 strategies for Objective 2.3

Recommendation: If freshwater mussels occur in the Minam River, please add into the appropriate strategy (or create a new one) the importance of incorporating freshwater mussels into in-stream restoration projects.

Rationale: Freshwater mussels are among the most threatened and endangered species in the US. The causes are dams, changes in water availability, introduced species, pollution, reduced habitat, and more. Freshwater mussels are an important First Food to indigenous peoples whose ancestral lands encompass the MRWA.

Mussels filter and clean water, including filtering pathogens and contaminants like PPCPs, PFAS, and microplastics. They improve nutrient cycling, slow water flow and improve oxygenation. All of these effects are additive. More mussels equals more ecosystem services.

At monitoring sites across the region, some populations are decreasing while others are staying steady. But there are also increasing large die-off events in established populations that are not understood.

River restoration projects can and do degrade and kill mussel populations. Mussels can't move and translocation efforts do not work. River restoration that fills channels for example, especially in depositional reaches, can destroy mussel beds.

Restoration projects haven't been taking mussels into consideration and consequently, large mussel beds are being degraded or lost. Mussel beds should be incorporated into designs at the earliest stages so they can be protected.

Thank you for the opportunity to comment. Please reach out to me anytime.

Respectfully submitted,

David Mildrexler, PhD
davidm@eorlegacylands.org
Systems Ecologist
Eastern Oregon Legacy Lands
Joseph, Oregon