



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Shoshone Field Office  
400 West F Street  
Shoshone, Idaho 83352-5284  
(208) 732-7200



In Reply Refer To:  
80224

August 24, 2012

Dear Permittee/Interested Public:

We want to inform you that the Idaho BLM is no longer using pre-decisional Environmental Assessments (EA) as a means to seek public input to help us analyze project proposals through the National Environmental Policy Act (NEPA). Instead, Idaho BLM will be soliciting your thoughts and comments for individual projects by informing you of upcoming projects through a Scoping/Information Package document. Soliciting your comments at the start of the NEPA process helps us to ensure that pertinent issues are identified and studied early, and items that are of minimal concern do not unnecessarily consume your time and effort.

This letter is to notify you that the Shoshone Field Office is seeking comments for the Elkhorn Allotment Grazing Permit Renewal EA, Project #DOI-BLM-ID-T030-2011-0025-EA. The Scoping/Information Package for this project proposal can be found on the BLM e-Planning website at:

[https://www.blm.gov/epl-front-office/eplanning/nepa/nepa\\_register.do](https://www.blm.gov/epl-front-office/eplanning/nepa/nepa_register.do)

Please follow the steps below in order to find the Elkhorn Allotment Grazing Permit Renewal Scoping Package. The address above should be typed in its entirety, including the “**https://**” portion to ensure that you are directed correctly.

- 1) Under the “State(s)” field, select “**Idaho**”
- 2) Under the “Office(s)” field, select “**ID-Shoshone FO**”
- 3) Under the “Document Type(s)” field, select “**EA**”
- 4) Under the “Fiscal Year(s)” field, select “**2011**”
- 5) Under the “Program(s)” field, select “**Livestock Grazing**”
- 6) When you have finished selecting all the fields, click “**Search**”
- 7) Click on “**DOI-BLM-ID-T030-2011-0025-EA**”
- 8) At the bottom of the NEPA Project Summary Page, under “**Links**”, click **Elkhorn\_Scoping\_Package** in order to view this document.

Your comments are specifically requested on the proposed action, preliminary issues, and alternatives. Comments made on this proposal would be most helpful if they are received on or before September 21, 2012 and are directly relevant to the proposal and project area. The BLM will accept feedback beyond this date, however, such comments may be considered secondary to comments received in a timely manner.

The primary contact for questions and comments related to this analysis is Joanna Tjaden, Rangeland Management Specialist, and she can be reached at (208) 732-7292. Please submit your comments in writing to either the Shoshone Field Office or to **joanna\_tjaden@blm.gov**.

Sincerely,

/s/ Holly Hampton

Holly Hampton  
Acting Shoshone Field Manager

cc:

Denis Kowitz, 171 N. Highway 77, Declo, ID 83323  
Blaine County Commissioners, 206 1st Ave S Ste 300, Hailey, ID 83333  
Audubon Society, Prairie Falcon Chapter, c/o Julie Randall, 3952 N. 3600 E.,  
Kimberly, ID 83341  
Committee for the High Desert, P.O. Box 2863, Boise, ID 83701  
Dr. Balthasar Buhidar, Idaho Department of Environmental Quality, 1363 Fillmore  
Street, Suite 2, Twin Falls, ID 83301  
ICL Public Lands Office, P.O. Box 844, Boise, ID 83701  
Idaho Department of Lands, South Central Supervisory Area, 324 S 417 E, Suite 2,  
Jerome, ID 83338  
Idaho Department of Fish and Game, 319 S 417 E, Suite 1, Hwy 93 Business Park,  
Jerome, ID 83338  
Idaho State Department of Agriculture, Division of Animal Industries,  
Attn: Ron Kay, P O Box 7249, Boise, ID 83707  
Idaho Wildlife Federation, P.O. Box 6426, Boise, ID 83707  
Shoshone-Bannock Tribes, P.O. Box 306, Fort Hall, ID 83203  
The Wilderness Society, Idaho Regional Office, 950 W. Bannock Street Suite 605,  
Boise, ID 83702  
Western Watersheds Project, P.O. Box 1770, Hailey, ID 83333  
David Skinner, P.O. Box 664, Fairfield, ID, 83327  
Paul McClain, 619 Elm Circle, Gooding, ID 83330-1863  
Mel Quale, Quale Electronics, 1730 Kimberly Rd, Twin Falls, ID 83301  
Dennis Crane, 360 S. 150 E., Burley, ID 83318  
Chris J. Christiansen, 105 N. 740 W., Blackfoot, ID 83221

**UNITED STATES DEPARTMENT OF THE INTERIOR  
BUREAU OF LAND MANAGEMENT**

**Twin Falls District  
Shoshone Field Office  
400 West F Street  
Shoshone, ID 83352**

**SCOPING/INFORMATION PACKAGE**

**ELKHORN ALLOTMENT (#80224)  
GRAZING PERMIT RENEWAL**

Project # DOI-BLM-ID-T030-2011-0025-EA

The information in this package summarizes a Bureau of Land Management (BLM) proposal to authorize a permit renewal in the Elkhorn Allotment #80224. The action being analyzed is the renewal of a livestock grazing permit in the Elkhorn Allotment per 43 Code of Federal Regulations (43CFR), Subpart 4180-Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration in accordance with the 1981 Sun Valley Environmental Impact Statement (EIS). Federal actions must be analyzed in accordance with the National Environmental Policy Act (NEPA) and other relevant Federal and State laws and regulations to determine potential environmental consequences.

The purpose of this document is to inform you and other interested and affected parties of this proposal, and to solicit your comments to assist us with the NEPA review of the proposal. The analysis of this proposal is currently ongoing, and will eventually be documented in an Environmental Assessment (EA) with an estimated completion date of Fall 2013. Comments received in response to this solicitation will be used to identify potential environmental issues related to the proposed action and to identify alternatives to the proposed action that meet the purpose and need for the project.

**Purpose and Need for Action**

The Sun Valley EIS identifies the Elkhorn Allotment as available for domestic livestock grazing. Where consistent with the goals and objectives of the EIS and Idaho's Standards and Guidelines for Grazing Management (1997), it is BLM policy to authorize allocation of forage for livestock grazing to qualified operators. The purpose of the proposed action is to authorize livestock grazing consistent with BLM policy and in a manner that maintains or improves project area resource conditions and achieves the objectives and desired conditions described in the Sun Valley EIS. The Elkhorn Allotment is currently meeting all applicable Idaho Standards for Rangeland Health.

## **Existing Condition**

The Elkhorn Allotment is located in Blaine County; approximately two miles southeast of Ketchum, Idaho (refer to Map 1). Elevations in this allotment range from 5,000 to 7,000 feet. Livestock use includes sheep grazing in the spring, fall or both. The Elkhorn Allotment is comprised of 2,774 federal acres managed by the BLM, 438 acres managed by Idaho Department of State Lands and 2,234 private acres.

The Elkhorn Allotment is 5,446 total acres with 2,774 acres in federal ownership, 438 acres in Idaho Department of Land ownership, and 2,234 acres in private ownership. It is made up of three large gulches that run northwest and southeast, two of which are comprised of federal lands and one that is comprised of private and state lands (refer to Map 1). Denis Kowitz is the current permittee in the Elkhorn Allotment and the type of livestock that he is permitted to graze is sheep. Most of the use made by sheep occurs in the center of the allotment on the private and state lands. Some use is also made in Triumph Gulch as well as on the ridge tops on the western side. The sheep typically graze the allotment in the summer and again in the fall. In most years, the use occurs prior to October 15th.

Originally both sheep and cattle use were permitted in the Elkhorn Allotment. The cattle permits were suspended in 1987 and currently only sheep use is permitted in the allotment. Livestock grazing use within this allotment was analyzed in the 1981 Sun Valley EIS. In that document, no decreases in permitted use were proposed for sheep in the Elkhorn Allotment because there was not a need for them at the time. The 1981 Sun Valley EIS identifies the grazing use dates for both cattle and sheep as beginning on 5/15 in the Elkhorn Allotment and ending on 11/10. Previously, the season of use was from 5/1 to 11/10 but was changed in 1981 because May 1st was considered too early for livestock to turn out.

Most of the livestock use in the allotment occurs on the private section in the middle of the allotment but use also does occur in Triumph Gulch. Many of the riparian areas in the allotment are on private or State Lands but there are some portions on BLM lands located in Triumph Gulch as well a small portion in Elkhorn Gulch located at the northern end of the allotment.

Actual use data have been collected annually in the Elkhorn Allotment since 1975. The average actual use between 1975 and 2011 for livestock was 29% of the average active preference or 97 AUMs. The original actual use forms can be found in the Elkhorn Allotment Studies File at the Shoshone BLM Office.

There is one long term trend plot in the Elkhorn Allotment located in Peters Gulch on the north end of the allotment. This trend plot is located in an area of the allotment that can no longer be accessed by road due to the expansion of housing in Ketchum. Trend has been read at Site 1 in 1985, 1988 and in 1991. It has not been read since then due to its inaccessibility to the BLM but a new trend plot will be established in 2013.

Big game wildlife species include mule deer and elk. Mule deer and elk use occurs year-round with a greater level of use occurring in the late fall, winter, and early spring. The 1981 Sun Valley Management Framework Plan (MFP) made formal forage allocations for both deer and elk in the Elkhorn Allotment. The Sun Valley Management Framework Plan (MFP) allocated 63 deer months of forage during the summer (May 1 to October 30) use period and 28 elk AUMs of forage during the winter (November 15 to April 15) use period. Recent big game population trend counts conducted by Idaho Department of Fish and Game in the general area indicate that between 500 and 700 elk winter on or adjacent to land in the Elkhorn Allotment. If that number of animals were to remain there for up to 30 days, it would equate to 246 to 345 elk AUMs.

The BLM is developing a national strategy to preserve, conserve, and restore sagebrush habitat, the ecological home of the greater sage-grouse. The BLM will issue national policy and direction, based on local needs and information, to guide the agency's actions and raise the importance of sagebrush conservation in BLM planning efforts. The Idaho and Southwestern Montana Sub-Region-Specific EIS will address sagebrush issues and the impacts of amending all pertinent RMPs to reflect new conservation measures, including the land use plans under which the Shoshone Field Office is managed. The BLM anticipates that these will be formalized in plan amendments, and we are implementing the interim sage-grouse guidance as directed by state and national offices (Instruction Memorandum No. 2012-043). However, the Elkhorn Allotment does not contain any preliminary general or priority sage-grouse habitat.

Sage-grouse are found primarily in habitats dominated by sagebrush, particularly big sagebrush. Records at the Shoshone Field Office show there are no active or historic sage-grouse leks within the Elkhorn Allotment. The allotment provides marginal habitat conditions for sage-grouse due to the steepness of slope and depth of snow, and the abundance rating for forbs preferred by sage-grouse is relatively low.

Due to this allotment's close proximity to Triumph, Ketchum and the Wood River Valley, this area receives recreational use in the form of hunting, hiking, jogging, mountain biking and OHV use. The BLM land within the allotment has an Off-Highway Vehicle (OHV) classification as "Open". The Open classification is defined as an area where all types of vehicle use is permitted. Portions of the allotment, most south facing slopes, from Triumph Gulch to the Big Wood River are closed to all motorized vehicles December 1st to April 30th. The purpose for the closure is to assist wildlife (primarily big game) during a period of high stress. The closure has been in place since 1982.

The BLM is required to assess resource conditions on the allotment in conjunction with Technical Reference 1731-6 *Interpreting Indicators of Rangeland Health* (2000) and the final *Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management* (1997). Rangeland Health Standards and Guidelines are used as management goals by the BLM for the betterment of the environment, protection of cultural resources, and sustained productivity of the range. They were developed with the specific intent of providing for the multiple use of the public lands. The regulations direct that existing grazing management be modified through the term permit to ensure that rangeland health standards are achieved. Ultimately, the intent of the fundamentals of rangeland health and the Idaho standards is to

ensure that the resources within the allotment are meeting the Standards for Rangeland Health or are making significant progress towards meeting the Standards.

A Rangeland Health field assessment for the Elkhorn Allotment was completed in 2008 and sent to permittees and interested publics on June 4, 2009. No comment letters were received in response to the Elkhorn Allotment Assessment.

The action of re-issuing a term grazing permit for this allotment would not result in a change in the scope of the resource uses or a change in the terms, conditions, and decisions made. Establishing management practices and the appropriate grazing authorization through the incorporation of the Fundamentals of Rangeland Health would continue to allow allotment management to comply with the long-range direction outlined in the Sun Valley EIS. The Proposed Action described in this document is in conformance with the 1981 Sun Valley EIS and decision.

## **Preliminary Alternative Development**

### **Alternative 1 – Proposed Action**

Issue the grazing permit for a ten-year term which authorizes livestock use in the Elkhorn Allotment and incorporates the Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration (43 CFR 4180). This alternative describes the on-the-ground management action that the BLM proposes to implement and represents the proposed Management Guidelines. The Elkhorn Allotment grazing permit would authorize livestock use as specified in Table 1. No AUMs are proposed to be suspended in the allotment nor are any range improvements being proposed.

The proposed grazing permit will allow some flexibility in the livestock numbers in order for one band of 1,800 sheep or two bands (of up to 1,800 sheep) to be authorized. Flexibility in the sheep numbers would be authorized as long as grazing does not occur outside of the season of use and the active preference on the grazing permit is not exceeded. Any livestock use outside of the Terms and Conditions of the permit that has not been approved by the Authorized Officer will be in violation of the grazing permit and a trespass may be warranted.

**Table 1: Proposed Grazing Permit Authorization**

<b>Current Permittee</b>	<b>Livestock #</b>	<b>Grazing Begin End</b>	<b>%PL</b>	<b>Active AUMs</b>	<b>Suspended AUMs</b>	<b>Total AUMs</b>
Denis Kowitz	1,800 Sheep	5/15 to 11/20	100%	332	83	415

Sheep are generally herded in bands, have more continuous movement, different forage requirements, graze in a “pass-through” fashion on their way to other allotments, and utilize steeper terrain. Because of the herded management of sheep bands, topographic or infrastructure boundaries other than fence lines may be as or more useful for determining grazing routes and sequences than the pasture boundaries that were established to control cattle. For these reasons the following grazing guidelines have been developed.

### **Grazing Management under the Proposed Action**

- Range readiness guidelines will be adhered to. Range readiness is defined as when the soil is firm and the key species (Bluebunch wheatgrass and Idaho fescue) have four to six inches of growth, except for Sandberg's bluegrass which needs to be in the three- to-four-leaf stage.
- To prevent areas from being used twice in a season, livestock would not be permitted to stay and graze in an area which had already been used earlier that year, however they would be allowed to trail through previously used areas. Movement of livestock through a previously grazed area would be permitted for one day. If more time is needed, it must be approved by the Authorized Officer prior to use.
- Sheep camps are also required to move to a different bed ground at a minimum of every 5 days or sooner if resource conditions dictate. Conditions that would warrant moving the camp sooner would be if use of key species is close to or exceeds 40% utilization of current year's growth.
- Grazing within riparian areas would be managed to maintain or improve Proper Functioning Condition. Management would include leaving adequate perennial herbaceous and woody vegetation by the end of the growing season to protect riparian areas from erosion, maintain streambank integrity, provide for sediment catchment and allow for diversity in vegetation structure and age class.
- Trailing by other livestock operators that do not have a grazing permit for the Elkhorn Allotment would be approved following the completion of NEPA. Trailing permits will be authorized in accordance with 43 CFR 4130.6-3 (2005) - Crossing Permits and 43 CFR 4160 (2005) - Administrative Remedies; including Proposed Decisions, Protests, Final Decisions and Appeals).

### **Rangeland Monitoring under the Proposed Action**

Monitoring, as defined in 43 CFR 4100.0-5 (2005), means the periodic observation and orderly collection of data to evaluate: 1) effects of management actions; and 2) effectiveness of actions in meeting management objectives.

Nested frequency studies would continue to be done within the allotment. Nested frequency would be read at the one location and photos taken at the standard 3x3 photo plot. PFC would also continue to be collected along Triumph Gulch. These sites would be read periodically and at a minimum of once per ten year permit renewal cycle. This data will be combined with trend monitoring data collected in past years so that long-term rangeland trend can be determined. Since the last time trend data has been read, a static trend in rangeland health has been occurring. The trend site that was originally located in the allotment is no longer easily accessible due to the newly constructed homes and attempts at finding it in 2008 and 2012 failed. A new long-term trend site will be established in a more easily accessible location in Triumph Gulch.

### Alternative 2 – No Action (Current Management)

Under this alternative, the BLM Field Manager would continue to authorize livestock grazing in the Elkhorn Allotment following the Fundamentals of Rangeland Health [43 CFR 4180.1(2005)] to continue meeting Rangeland Health Standards in the future. This permit would be issued for ten years in accordance with the present management shown in Table 2. The permit would be issued for the same number of livestock, kind of livestock, season of use, and same active AUM preference level as presently authorized but the sheep numbers would be limited to 266 head of sheep only.

**Table 2: Alternative 2 – No Action Permit Authorization**

Current Permittee	Livestock #	Grazing		%PL	Active AUMs	Suspended AUMs	Total AUMs
		Begin	End				
Denis Kowitz	266 Sheep	5/15	11/20	100%	332	83	415

### Grazing Management under Alternative 2

The grazing permit would be issued with the same rangeland monitoring practices as stated in the proposed action.

### Rangeland Monitoring under Alternative 2

The grazing permit would be issued with the same terms and conditions.

### Alternative 3 - No Grazing Alternative

Under this alternative, the BLM Shoshone Field Manager would issue a non-use grazing permit, discontinuing livestock grazing in the Elkhorn Allotment for a term of 10 years. After the permit expires, the allotment would be assessed and evaluated to determine whether livestock grazing would be re-authorized.

Even though livestock grazing would not be authorized on public lands within the allotment, a series of management actions would still occur. These actions include monitoring of the riparian systems, conducting long-term trend studies, and authorizing livestock to trail through the allotment.

**Table 3: Alternative 3 - No Grazing Permit Authorization**

Current Permittee	Livestock #	Grazing		%PL	Active AUMs	Suspended AUMs	Total AUMs
		Begin	End				
Denis Kowitz	0 Sheep	-		100%	0	415	415

### Grazing Management under the No Grazing Alternative

The BLM Shoshone Field Office would conduct use supervision to ensure that unauthorized livestock grazing from neighboring allotments and/or private lands did not occur on public lands in the Elkhorn Allotment.

## Alternative Comparisons

This table describes the differences in the terms and conditions between all of the alternatives, such as the livestock numbers and AUMs.

**TABLE 4: Alternatives considered in Elkhorn Allotment Grazing Permit Renewal**

Alternative	Livestock Number	Season of Use	# Days Livestock Can Graze	Active Preference AUMS
<b>Proposed Action</b> – <i>Change in Livestock Numbers</i>	1,800 Sheep	05/15 to 11/20	31 Days	332
<b>Alternative 2</b> – <i>No Action</i>	266 Sheep	05/15 to 11/20	153 Days, or the whole season	332
<b>Alternative 3</b> – <i>No Grazing</i>	0 Sheep	None	0	0

## Alternatives Considered but Dropped from Further Analysis

The Shoshone Field Office ID Team also considered developing an alternative that reduces grazing use in the Elkhorn Allotment. A reduction in AUMs, season of use, or livestock numbers is not warranted at this time because the allotment is meeting all applicable Standards of Rangeland Health under the current livestock levels and the Elkhorn Allotment does not contain any preliminary priority sage-grouse habitat.

## Preliminary Issues

The BLM has identified some preliminary issues that are being considered for detailed analysis.

The soils are quite complex in the Elkhorn Allotment and most of this is due to steep topography and aspect. The soils in the Elkhorn Allotment are mostly dark colored, gravelly loams, gravelly silt loams and clay loams over 40 inches deep and are derived from volcanic, metasedimentary, or granitic materials. The Elkhorn Allotment is currently meeting the rangeland health standard for watersheds; however, the degree of mechanical impacts from livestock use and recreational use to the soil resource will be analyzed further in the environmental assessment.

Cover data collected at the four rangeland health transects was analyzed to evaluate the native plant communities. Many of the desired perennial grasses, forbs and shrubs native to the site are present and the plant species composition and abundance is similar to what the Natural Resource Conservation Service (NRCS) site description should be. Site 1 and Site 4 have perennial vegetation native to the site and the abundance is at what would be expected but there are also populations of cheatgrass present among the native plants. There was diversity and abundance of many forbs on all four sites but many were not accounted for in the transect.

The Elkhorn Allotment has known populations of spotted knapweed (*Centaurea maculosa*) and cheatgrass (*Bromus tectorum*). Spotted knapweed is on the Noxious Weed list for the State of Idaho and cheatgrass is an invasive species. The BLM had been actively controlling the weed infestations in the Elkhorn Allotment using chemical means. The chemical treatments are occurring along road sides since that is where the spotted knapweed occurs. These infestations could potentially pose the threat of not being able to provide a healthy, diverse, and productive native plant community on the allotment in the future.

The Elkhorn Allotment is considered to be crucial year round habitat for elk and mule deer. Due to the urbanization of the Wood River Valley, this area has become more important over the years for wildlife species. In the Elkhorn Allotment the grazing permit for sheep is from May 15<sup>th</sup> to November 20<sup>th</sup> so there is the potential for a dietary overlap between sheep and big game in the spring and fall. According to the actual use reports submitted since the 1970s, sheep grazing outside the permit use dates has not occurred. The potential conflict for a dietary overlap between sheep and big game will still be analyzed in the environmental assessment.

The only perennial stream located in the Elkhorn Allotment is Triumph Gulch located on the east side of the allotment and it was assessed as a lotic site in 2008 and again in 2012. There are other streams in the Elkhorn Allotment but they are intermittent and do not flow every year. Triumph Gulch runs south and has water flowing throughout the year. Parts of this tributary are under ground and parts are above ground with flowing water.

Triumph Gulch was rated as Functioning at Risk with No Apparent Trend in 2008. At the time of the field tour, the permittee was notified of the condition and since then minor management changes were implemented by the permittee; this has led to a reassessment of the stream in 2012. Triumph Gulch was rated at Proper Functioning Condition (PFC) and improvements have been made over the past four years. Proper Functioning Condition (PFC) is the minimum requirement for achieving Standards 2 & 3. Even though the Elkhorn Allotment is currently meeting all applicable Standards of Rangeland Health, riparian grazing levels will continue to be monitored in order to insure that improvement continues in the future.

### **Decision to be Made**

The Shoshone Field Manager will decide whether to authorize livestock grazing activities as described in the proposed action. The Field Manager will make a decision with management actions, mitigation measures, including permitted number of animals, season of use and terms of the permit.

### **Public Input Needed**

Comments are specifically requested on the proposed action, preliminary issues, and alternatives. Comments made on this proposal would be most helpful if they are received within 30 days of receiving this document and are directly relevant to the proposal and project area. The BLM will not reject public feedback outside established public involvement timeframes; however, these comments may be considered secondary to comments received in a timely manner and may only be assessed to determine if they identify concerns that would substantially alter the assumptions, proposal, design, or analysis presented in the EA.

Written comments must be submitted to Jim Tharp, Acting Shoshone Field Manager, Shoshone Field Office, 400 West F Street, Shoshone, ID 83352. The office business hours for submitting hand-delivered comments are 7:45 a.m. to 4:30 p.m. Monday through Friday, excluding holidays. Electronic comments must be submitted in a format such as an email message, plain text (.txt), rich text format (.rtf), Word (.doc), or portable document format (.pdf) to **joanna\_tjaden@blm.gov**. E-mails submitted to e-mail addresses other than the one listed, in other formats than those listed, or containing viruses will be rejected. To be most helpful,

comments sent electronically should include the title of this project in the subject line. Please identify whether you are submitting comments as an individual or as the designated spokesperson on behalf of an organization. Issues that are outside the scope of the proposal will not be addressed at this planning level.

Before including your address, phone number, e-mail address, or other personal identifying information in your comment, be advised that your entire comment, including your personal identifying information, may be released to the public at any time.

For questions or comments you can contact Joanna Tjaden, Rangeland Management Specialist, at (208) 732-7292 or [jtjaden@blm.gov](mailto:jtjaden@blm.gov).

**Enclosures:** *Elkhorn Allotment Map*

# ELKHORN ALLOTMENT

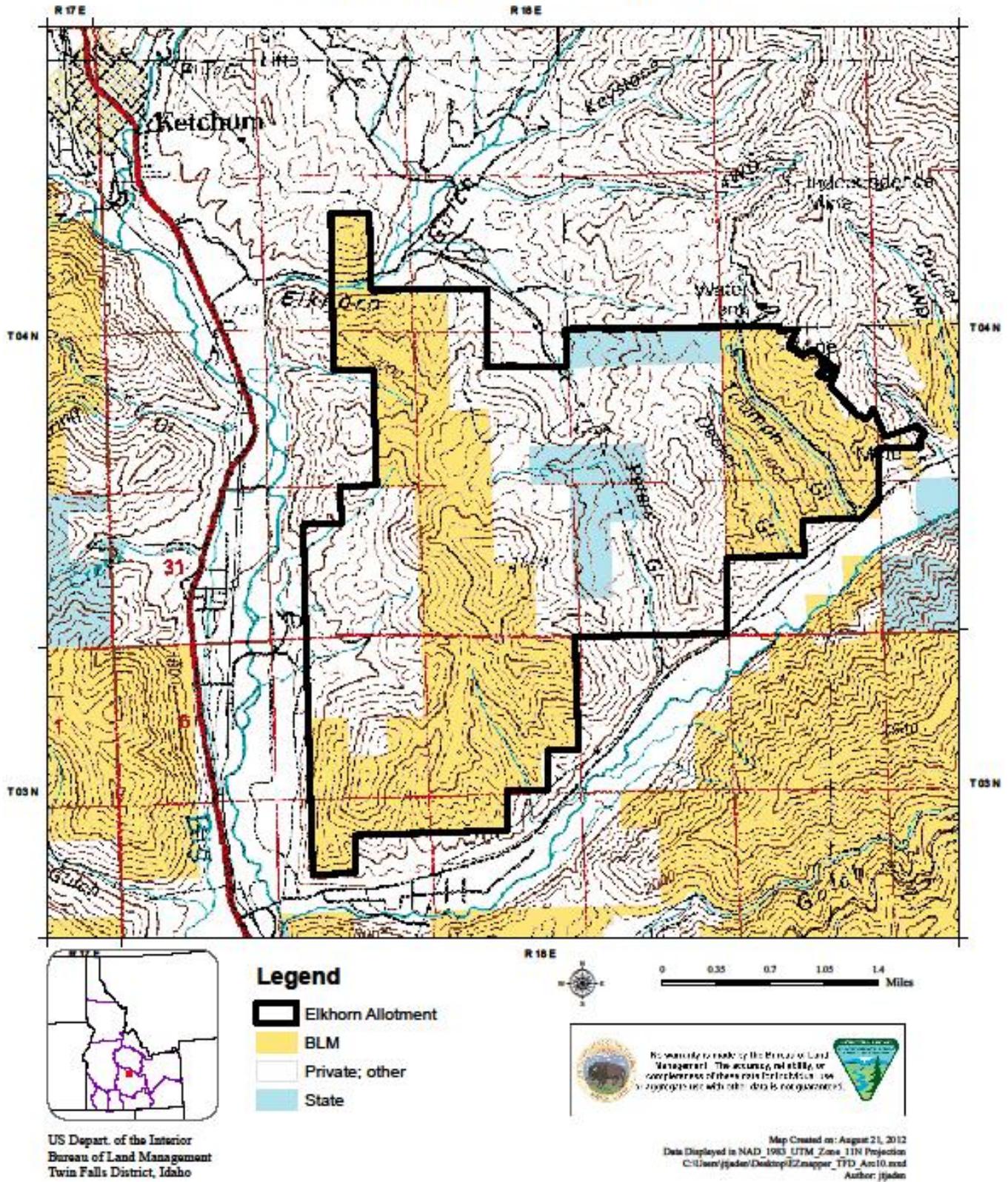


Figure 1 - Elkhorn Allotment Map