

Nickel Creek FFR Allotment (00657)

Evaluation and Determination

October 11, 2013

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Background:

This Evaluation and Determination covers the time period between 2003 and 2013, with comparison to data collected in 2001 and addressed in the 2003 documents.

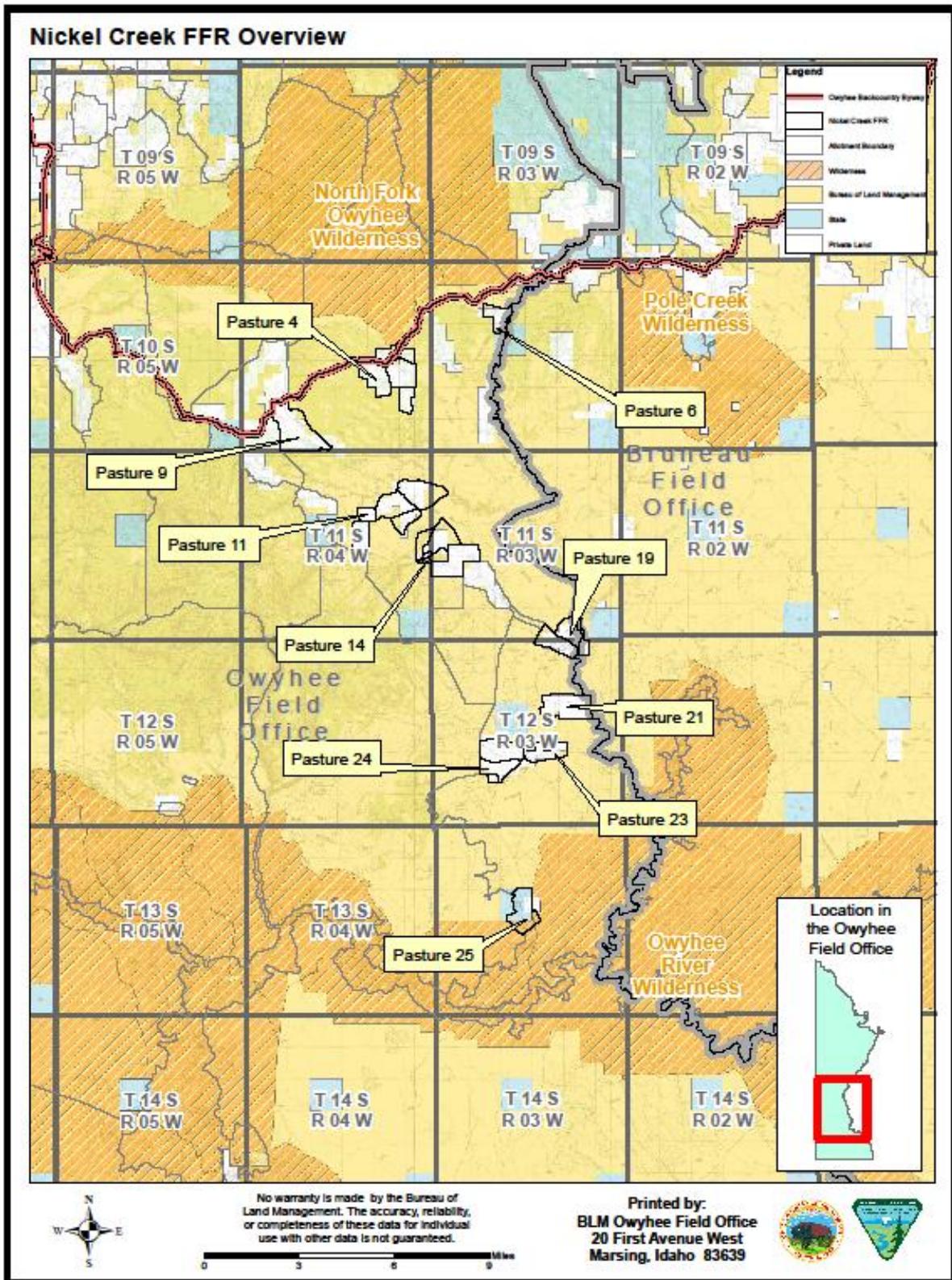
The Nickel Creek FFR Allotment is located near Juniper Mountain, in Owyhee County, Idaho, approximately 30 miles south of Mud Flat Road (Figure 1). The elevations within the Nickel Creek FFR Allotment range between 4,750 feet to 5,730 feet, with precipitation ranging from eight to 16 inches per year. Most of the perennial running water is located on private land, and because livestock tend to graze near water, cattle on the allotment tend to spend the majority of the season grazing private land.

The allotment is grazed by the Juniper Mountain Grazing Association (JMGA), which currently consists of three different operators. This allotment is divided into 10 pastures (4, 6, 9, 11, 14, 19, 21, 23, 24 and 25) scattered over approximately 20 air miles, with most pastures subdivided into individual fields. Some fields have less than 20 acres of BLM-managed lands, while other fields have over 100 acres. The allotment contains approximately 78% private land, 19% BLM-managed lands, and 3% Idaho state lands. Because this allotment includes a large acreage of private land, under the current permit the livestock numbers and dates have varied annually as determined by the permittee, provided that the 109 animal unit months (AUMs) permitted are not exceeded and unacceptable impacts to public land resources do not occur.

Grazing management from approximately 1990 to 2001 was generally season-long with high stocking rates, no rotations or rest, and few improvements on private lands within the FFR. During this time period, the JMGA consisted of 17 members.

A Rangeland Health Assessment (Assessment) and subsequent Determination document were completed for the Nickel Creek FFR Allotment in 2003, based on Rangeland Indicators collected in 2001. The 2003 Determination stated that Standards 1, 2, 3, 4, 7, and 8 were not being met in the Nickel Creek FFR Allotment. Current livestock grazing management was determined to be a significant causal factor. Livestock management practices did not conform with Guidelines 1, 3, 4, 5, 7, 9, 10, and 12. Specific grazing management practices identified in the Determination included heavy utilization, bank trampling, and hot season use in riparian areas (Standards 1, 2, 3, 7, and 8) and high grazing use coinciding with critical growth period for perennial plants (Standard 4).

Figure 1. Overview Map



Although no changes were made to the terms and conditions of the Nickel Creek FFR permit, changes in livestock management did occur between 2001 and 2005. These changes resulted from management changes in the Nickel Creek Allotment, a reduction in JMGA membership (to three current operators), and in response to the 2003 Determination. These changes include running approximately half as many cattle as in the past, incorporating periodic rest and deferment (use after seed ripe), reduced season-long grazing, and increases in private hay meadows and irrigation. The JMGA members have also developed a grazing system that separates the Nickel Creek FFR Allotment into three general geographical areas (northern, central, and southern) and separates and rotates livestock using different fields and pastures. This has resulted in increased permittee livestock management opportunities.

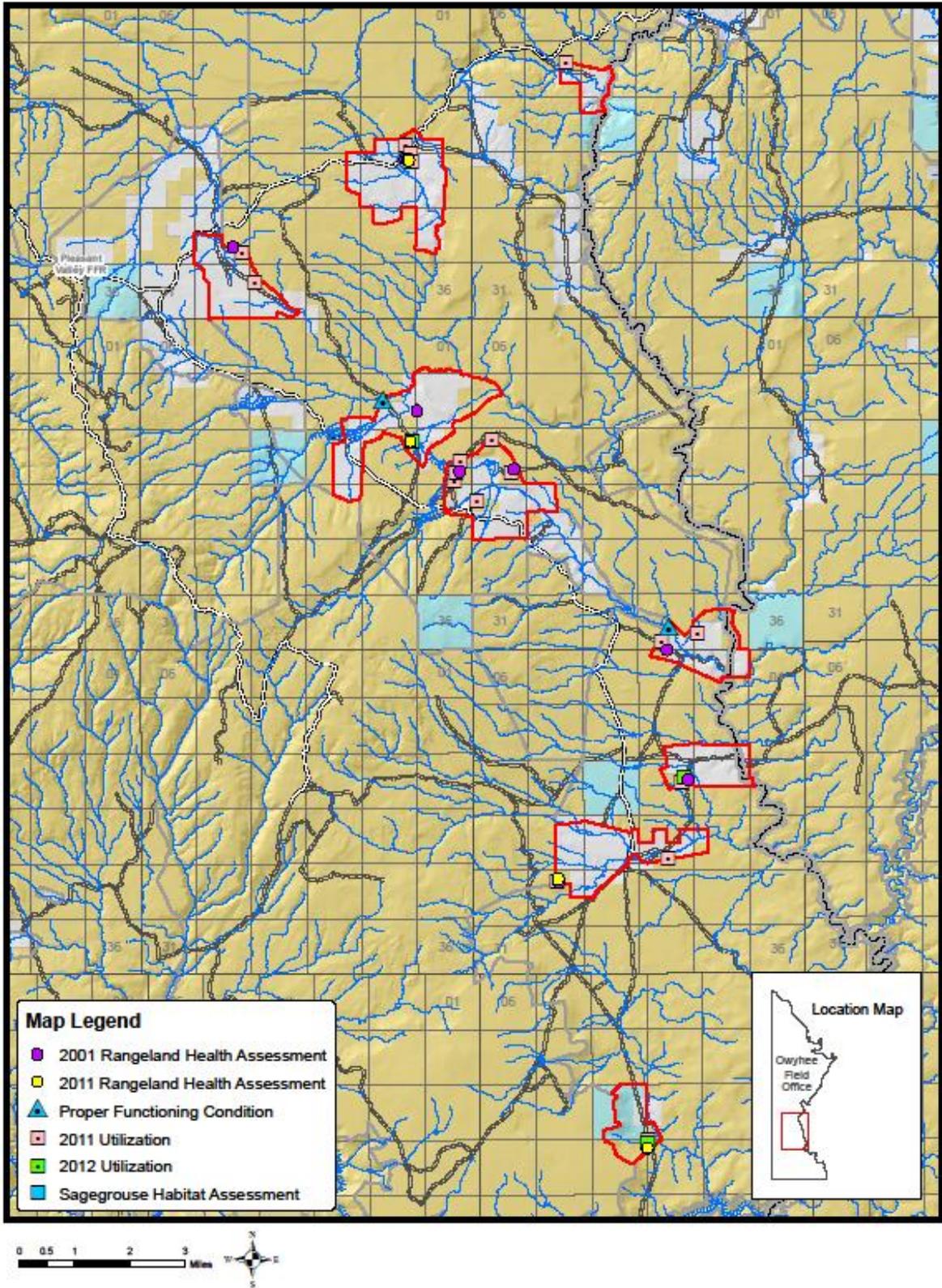
In the summer of 2011, the Owyhee Field Office Interdisciplinary Team (IDT) determined that the 2003 Determination should be updated to more accurately reflect conditions on the ground. This updated Evaluation and Determination is based on additional data collected through 2012 (see table below). Information gathered since the 2003 Assessment is discussed in the Affected Environment sections for the applicable resource for each Standard in Environmental Assessment (EA) # DOI-BLM-ID-B030-2011-0006-EA, Nickel Creek FFR Grazing Permit Renewal EA. This report uses that information, and constitutes a new Evaluation and Determination for the Nickel Creek FFR Allotment based on conditions through 2012.

Data sources used for this Evaluation/Determination are as shown in the following table. Specifics are discussed under the applicable Standard. See Table 1 for data sources and Figure 2 for monitoring locations for Rangeland Indicators, Riparian Assessments, Utilization, and Sage-grouse Habitat Assessments.

Table 1. Data Sources for Evaluation and Determination

Information Type	Date(s)	Location of Information
Previous Assessment and Determination	2003	Owyhee Field Office Files
Field evaluation of Interagency Technical Reference 1734-6 Interpreting Indicators of Rangeland Health (Rangeland Indicators)	2011	Owyhee Field Office Files
Ecological Site Descriptions (Natural Resources Conservation Service Draft Documents)	2005	Owyhee Field Office Files
Castle and Smith Creek Proper Functioning Condition (PFC) Assessments	2011	Owyhee Field Office Files
Nickel Creek FFR Allotment Actual Use	2011	Owyhee Field Office Files
Nickel Creek FFR Allotment Utilization	2011-2012	Owyhee Field Office Files;
Idaho Department of Fish and Game's Idaho Fish and Wildlife Information System (IFWIS)	As of 2012	Owyhee Field Office Geographic Information System (GIS) Files
Sage-grouse Habitat Assessments	2012	Owyhee Field Office Files
Ecological Site mapping, Soil Survey, Existing vegetation mapping, NAIP Imagery, and Noxious Weed locations	As of 2012	Owyhee Field Office GIS Files
Idaho Department of Environmental Quality (IDEQ) Upper Owyhee River TMDL Five-Year Review	2009	Owyhee Field Office Files
Wildlife habitat mapping, species occurrence locations, wildlife monitoring survey locations	As of 2012	Owyhee Field Office GIS Files
Special Status Plant occurrence records	As of 2012	Owyhee Field Office Files

Figure 2. Monitoring Locations - Nickel Creek FFR Allotment



Note that much of this information is primarily qualitative rather than quantitative, and ecological site descriptions do not include specific figures for some important elements (such as biological soil crust cover), so the evaluation uses both numerical and non-numerical comparative terms.

Standard 1-Watershed

Overview

The allotment is within four watersheds (North Fork Owyhee River, Headwaters Deep Creek, Deep Creek and Red Canyon-Owyhee River) and is part of the Upper Owyhee sub-basin (HUC 170050104). Pastures 4, 6, 11, and approximately four acres of public land in Pasture 9 are within the Headwaters Deep Creek watershed. The remaining acres of Pasture 9 are in the North Fork Owyhee River watershed. Pastures 14, 19, 21, 23, and 24 are within the Deep Creek watershed, and Pasture 25 is within the Red Canyon-Owyhee River watershed. Soils vary greatly between pastures. Generally the northern pastures are shallow claypan sites and southern pastures are loamy sites. Soil series within the allotment are presented in Table 2. Susceptibility of soil to rill and sheet erosion, for the whole soil fraction is low to moderate and to wind erosion is low. The susceptibility of soils to frost action generally increases geographically from south (low to moderate) to north (moderate to high).

Table 2. Specific soil series on public land and percent the soil series represents on the entire Nickel Creek FFR Allotment

Soil Series	Acres	Percent of Allotment
Babbington-Piline association, 0 to 3 percent slopes	>1	>1%
Deunah-Yatahoney-Lostvalley complex, 1 to 10 percent slopes	6	>1%
Hat-Avtable-Monasterio complex, 1 to 20 percent slopes	8	>1%
Hat-Nagitsy-Rock outcrop complex, 5 to 50 percent slopes	1	>1%
Hat-Rock outcrop-Nipintuck complex, 2 to 35 percent slopes	2	>1%
Nipintuck-Squawcreek-Rock outcrop complex, 2 to 30 percent slopes	6	>1%
Welch-Upcreek loams, 0 to 3 percent slopes	7	>1%
Goose Creek loam, 1 to 3 percent slopes	12	1%
Dougal-Bruncan stony sandy loams, 2 to 20 percent slopes	40	2%
Rubble land-Rock outcrop-Pachic Argixerolls complex, very steep	46	2%
Fairylawn-Schnipper silt loams, 1 to 8 percent slopes	85	4%
Squawcreek-Wickahoney stony loams, 1 to 20 percent slopes	69	4%
Rock outcrop-Xerollic Haplargids complex, very steep	109	6%
Hurryback-Wickahoney association, 3 to 45 percent slopes	145	7%
Perla-Ruclick complex, 2 to 12 percent slopes	129	7%
Squawcreek-Avtable-Wagonbox complex, 1 to 15 percent slopes	145	7%
Mulshoe-Squawcreek-Gaib association, 2 to 30 percent slopes	160	8%
Weash-Schnipper complex, 1 to 8 percent slopes	149	8%
Wickahoney-Budlewis complex, 1 to 10 percent slopes	171	9%
Mollic Haploxeralfs-Pachic Argixerolls complex, steep	190	10%
Pixley-Barkley complex, 2 to 10 percent slopes	194	10%
Paynecreek-Northcastle-Blackwell association, 0 to 8 percent slopes	266	14%

Evaluation:

The 2001 field evaluation of indicators, along with updated utilization, actual use, and 2011 field evaluations of indicators as discussed in the Nickel Creek FFR EA are used to evaluate the Watershed Standard. Indicators for evaluation of the standard include the amount and distribution of ground cover, including litter, appropriate for site stability; and evidence of accelerated erosion (in the form of rills and/or gullies, erosional pedestals, flow patterns); physical soil crusts/surface sealing; and compaction layers below the soil surface above levels identified for soil type and landform.

Vegetation is the primary factor that influences the spatial and temporal variability of soil processes and as vegetation condition changes, so does runoff, erosion, and infiltration. The 2001 field evaluation of indicators identified that erosion indicators such as pedestalled bunchgrass and water flow patterns were observed throughout the allotment, but varied in intensity. Microbiotic soil crusts were lacking in areas that usually support the crusts.

The 2011 field evaluations of indicators in Pastures 4, 11, 24, and 25 noted pedestalling, historical soil loss, a lack of biotic crust and invasive species at all stops. In most cases the current vegetation, litter and rock were adequate to prevent further soil erosion. Indications of accelerated soil erosion (pedestalling, historical soil loss, a lack of biotic crust) can be related to historic grazing (greater than 50 years ago) and exacerbated by past grazing management (over 10 years ago). Observations and indicators that led to this conclusion include photos documenting 2011 survey showing establishment of perennial herbaceous riparian species on cut banks and bars, establishment of willow species on stream channels, but no old or decadent willows present and mature sagebrush growing encroaching into dry meadow systems because of channel incisement.

Juniper encroachment is evident in Pastures 4, 9, 11, and 19.

Evaluation Finding – Allotment is (check one):

Meeting the Standard

Not meeting the Standard, but making significant progress toward meeting

Not meeting the Standard

Evaluation Rationale

Standard 1 is not being met on the majority of the allotment as indicated by the evidence of accelerated soil erosion, an imbalance of increaser to decreaser plant species, and to a lesser extent, the increase in juniper. Indications of accelerated soil erosion such as water flow patterns and pedestaled bunchgrasses were observed in all pastures. While these indications of accelerated erosion are related to historic and past grazing practices, the site is maintaining that condition, therefore, the standard is not being met for the soil resource. Native plant conditions appear to be similar to those described in 2003, although shallow-rooted bunchgrasses and annuals appear to have increased since the 2001 fieldwork.

Determination:

Standard 1 is not being met throughout the allotment. The observed indicators (rills and/or gullies, erosional pedestals, flow patterns, physical soil crusts/surface sealing, and compaction layers below the soil surface) are outside of expected condition for the soil type and landform

and are the primary causes for not meeting Standard 1. The increase in invasive grasses and, to a lesser extent, juniper encroachment also contributes to this standard not being met.

Determination Finding: The Nickel Creek FFR Allotment is (check one or more):

- Meeting the Standard
- Not Meeting the Standard, but making significant progress toward
- Conforms with Guidelines for Livestock Grazing Management
- Not Meeting the Standard; Current Livestock Grazing Management Practices are Significant Factors
- Not Meeting the Standard; Current Livestock Grazing Management Practices are **not** Significant Factors
- Does not conform with Guidelines for Livestock Grazing Management Guidelines No(s).

Determination Rationale

Indications of accelerated soil erosion such as water flow patterns and soil pedestals are observed throughout the allotment. This erosion is associated with observed reductions of deep-rooted perennial bunch grasses that is due to historic livestock grazing. Increases in shallow-rooted non-native grasses have reduced soil cover and litter necessary for soil site stability. The 2011 field evaluation of indicators and utilization data led to the conclusion that current grazing management practices have not affected plant vigor. These conditions would be expected to be maintained under the same management. The result would gradually increase litter that would help the soils rebuild what was lost from past management practices.

Standard 2 Riparian areas and Wetlands & Standard 3 Stream Channel/Floodplain

Overview

Approximately 4 miles of streams are within the Nickel Creek FFR Allotment. Of those streams, about 1.5 miles are livestock accessible while the others are inaccessible either due to fencing or topography (see Table 3). Stream drainages include Castle, Deep, Nickel, and Smith Creeks.

Table 3. Nickel Creek FFR stream reaches by pasture and livestock accessibility

Pasture Number	Stream Name	Reach Miles	Livestock Accessible
4	Nickel Creek	0.05	No
6	Current Creek	0.16	Yes
6	Deep Creek	0.07	Yes
11	Smith Creek	1.10	No
11	Smith Creek	0.40	Yes
11	Nickel Creek	0.65	No
14	Castle Creek	0.32	Yes
14	Unnamed	0.47	Yes
19	Castle Creek	0.23	Yes
19	Deep Creek	0.78	No

Evaluation:

Proper Functioning Condition (PFC) assessment, field notes and photographs are used to evaluate the riparian areas and wetlands and stream channel/floodplain standards. Indicators

used for evaluation of Standard 2 for riparian systems within the Nickel Creek FFR Allotment are riparian vegetative structure and function, age class and structural diversity of riparian vegetation, and presence of noxious weeds not increasing. Indicators for Standard 3 are evidence that floodplain can be accessed during high flow events, ability to dissipate energy during high flow events, and streambank stability and channel characteristics are consistent with the channel type and contributing watershed, and little evidence of excessive compaction on floodplain.

The 2003 Evaluation with updated lotic PFC assessments in the Nickel Creek FFR EA were used to evaluate the riparian areas and wetlands and stream channel/floodplain standards.

The 2003 Evaluation identified that Standards 2 and 3 were not being met on 0.75 mile of Smith Creek and were being met on 0.25 mile of Deep Creek. At that time, 0.25 mile of Castle Creek was not evaluated for functioning condition, but monitoring indicated riparian health may be impacted as livestock extensively used riparian plants along Castle Creek. Functioning at risk stream segments were dominated by early seral, shallow rooted species, such as Kentucky bluegrass and red top. There was inadequate riparian-wetland vegetation present to protect streambanks and dissipate energy during high flows. Grazing caused these vegetative shifts and was limiting the riparian areas' abilities to recover and rejuvenate. The heavy and severe utilization by livestock along Smith and Castle creeks did not provide sufficient residual vegetation to improve, restore, or maintain healthy riparian functions.

Two lotic Proper Functioning Condition (PFC) assessments were conducted in 2011 on 0.32 mile segment of Castle Creek in Pasture 14 and 0.40 mile segment of Smith Creek in Pasture 11. Both were rated as functional at-risk (FAR) with apparent upward trends.

Castle Creek segment (0.32 miles) is a low gradient, C channel that is deeply entrenched. Within the incised channel, the current channel meanders and has dense riparian vegetation comprising both woody and herbaceous species. Signs of historic excessive erosional events (channel entrenchment) occur almost the entire segment (from pasture boundary to private land). Erosion still occurs on cut banks; however dense riparian vegetation prevents much of the bedload transference into private lands or Deep Creek. No livestock impacts such as hoof shearing, woody browse, or heavy use were observed in the 2011 PFC assessment. Riparian vegetation appeared healthy with high vigor. Many young but no mature willows observed. There is a small reservoir approximately 0.7 miles upstream that controls flows in that segment from 4/01-10/3. Many years that segment is completely dry in July because of the irrigation diversion, and the only water this segment receives is from irrigation excess.

Smith Creek segment (0.4 miles) is a low gradient, C channel that is deeply entrenched in some areas that has a width to depth ratio that is out of balance with landscape form and geology. This was noted by evidence of heavy bedload (erosional deposition) in the channel and some exposed cutbanks. However riparian vegetation is re-establishing and beginning to stabilize gravel/sand bars. Also the stream channel is re-vegetating with willows, sedges and rushes whose root masses are sufficient to hold bank sediment during high flow events. Downstream a headcut was observed that was armored with cobble sized stone, and is unlikely to erode further upstream. From discussions with permittees, flow is likely intermittent and not as perennial as once thought, however several redband trout were observed and that reach could be considered a fishery.

Evaluation Finding – Allotment is (check one):

Meeting the Standards

Not meeting the Standards, but making significant progress toward meeting

Not meeting the Standards

Evaluation Rationale

Sedges, rushes, and young willows are establishing on sand bars and bedload deposits in Smith and Castle Creeks and are likely holding bank sediments together during high flows. The indicators of riparian vegetative structure and function, age class and structural diversity of riparian vegetation, are improving and are making progress for meeting Standard 2. However, the channel forms (sinuosity, width to depth ratio) are not in balance with the landscape and will likely not be for many years due to the severity of channel entrenchment. The indicators for Standard 3 related to channel characteristics are not currently consistent with the channel type and contributing watershed therefore, Standard 3 is not being met. Standard 3 is making significant progress toward meeting the standard however, because dense riparian vegetation (both herbaceous and woody species) is currently preventing bedload transference, and gravel/sandbars are stabilizing.

Determination:

Determination Finding: The Nickel Creek FFR Allotment is (check one or more):

Meeting the Standards

Not Meeting the Standards, but making significant progress toward meeting

Conforms with Guidelines for Livestock Grazing Management

Not Meeting the Standards; Current Livestock Grazing Management Practices are Significant Factors

Not Meeting the Standards; Current Livestock Grazing Management Practices are **not** Significant Factors

Does not conform with Guidelines for Livestock Grazing Management Guidelines No(s)

Determination Rationale

Standards 2 and 3 are not being met, as indicated by deeply entrenched channels, increased width-to-depth ratio, and excessive bedload (sediment). The conditions represented by these channel and riparian characteristics were caused prior to the last decade and current management is maintaining or improving Standards 2 and 3. This conclusion was based on the fact that only the young age class of willow was observed during the 2003 evaluation or the 2011 PFC assessment; inferring that willows that previously occupied this site were removed by either excessive grazing or mass erosion events. Significant progress toward meeting these Standards is indicated by the presence of herbaceous riparian vegetation that is re-stabilizing streambanks. Castle and Smith Creeks are so deeply entrenched that it is unlikely either would be considered PFC in the near future due to their geomorphology. Both 2011 lotic PFC assessments identified an apparent upward trend. Riparian vegetation (both woody and herbaceous) increased and improved stabilization of sandbars from what was reported in 2003.

Standard 4 Native Plant Communities

Overview

Public lands within the Nickel Creek FFR Allotment are mapped within three main ecological sites:

- Shallow claypan, 12-16” precipitation, low sagebrush/Sandberg bluegrass and bluebunch wheatgrass

- Loamy, 13-16” precipitation, mountain big sagebrush/bluebunch wheatgrass and Idaho fescue
- Loamy, 11-13” precipitation, basin big sagebrush/bluebunch wheatgrass

For each of these ecological sites, the expected vegetation (defined by reference conditions) would be co-dominated by sagebrush and mostly large bunchgrasses. The existing vegetation has sagebrush and other shrub cover similar to expected conditions, but large bunchgrasses have been reduced in much of the allotment, as described below.

Evaluation:

Information sources to evaluate Standard 4 include the 2003 Assessment and Determination, 2011 Rangeland Indicators, 2012 sage-grouse habitat assessments, 2009 NAIP imagery, BLM noxious weed GIS layer, and utilization. Indicators to evaluate the Standard include the vigor of large bunchgrasses and small bunchgrasses, maintenance or improvement of native plant communities allow for proper functioning ecological processes as related to reference conditions described in the ecological site descriptions. Significant progress toward meeting the Standard would be indicated by an increase in some or all of these indicators, without an increase in bare ground, noxious weeds, and invasive annuals. Utilization was not used as an indicator of this standard but was evaluated to determine if current livestock grazing management was a significant causal factor in not meeting the standard.

The 2003 Assessment documented slight-moderate departure from reference conditions for low sagebrush communities. The strongest indication of the departure was a reduction of large bunchgrasses (especially in the interspaces) and biological crusts. Invasive plants (cheatgrass and juniper; Russian knapweed in one pasture) were present in some pastures. Plant vigor showed none-slight or slight-moderate departure from reference conditions; the more departed areas had low vigor, density, and recruitment, especially in interspaces. The Assessment described similar conditions in big sagebrush communities, with slight-moderate departure from reference conditions indicated by an increase in Sandberg bluegrass and rabbitbrush and a reduction in biological soil crusts. Species diversity in big sagebrush sites was similar to reference conditions, but species composition was altered, particularly a reduction in bluebunch wheatgrass. Cheatgrass and juniper were also identified as invasives in some pastures. Vigor and recruitment of native plants showed none-slight departure from reference conditions; noted were areas with evident pedestals, limited bunchgrass crown die-out, insect-related shrub mortality, and some recruitment.

The 2011 Rangeland Indicators found conditions similar to 2001-2003 at the four sites evaluated. Three primary areas of departure from reference conditions were noted: a) historic loss of soil (see Standard 1 - Watershed), b) reductions in large bunchgrasses (particularly bluebunch wheatgrass) and biotic soil crusts, and c) presence of invasive species. The most substantial change was an apparent increase in invasive annual plant species, which included Phase 1-2 juniper encroachment in some areas, and the presence (and in some cases abundance) of non-native annual grasses. Exotic grasses were primarily cheatgrass and some bulbous bluegrass (a perennial), but also included several species not noted in the 2001 field evaluation, such as *Ventenata dubia*, *Bromus commutatus*, and *Apera interrupta*. Precipitation was higher in 2011 than 2001 (well above average versus somewhat below average, based on RAWs and SNOTEL data from Brace Flat and Mud Flat sites), which may partially explain why annual grasses were more visible in 2011 than 2001. Nonetheless, the apparent increase in exotic annual grass species since 2001 constitutes a “red flag” suggesting a declining trend in native plant community integrity, although other factors are stable. Perennial

grasses were reduced in abundance in comparison to reference conditions, but existing plants exhibited high vigor and seed production, consistent with high precipitation and light use at the time of assessment.

Sage-grouse habitat assessment transects (Tables 4 and 5) showed conditions consistent with those described in the Rangeland Indicators. Shrub cover is similar to reference conditions, but large bunchgrass cover is reduced. There is increased presence of small bunchgrasses and invasive annuals. Forbs and biological soil crusts are also somewhat reduced compared to reference conditions.

Table 4. Ground Cover from Sage-grouse Habitat Assessments

Ground Cover Element	Pasture 11	Pasture 21	Pasture 25
Duff/litter	14%	60%	42%
Rock/gravel	54%	0	24%
Bare ground	12%	24%	24%
Biological soil crust	6%	4%	4%
Basal Perennial Vegetation	Sandberg bluegrass 12%, Phlox 2%	Sandberg bluegrass 10%, Bluebunch wheatgrass 2%	Sandberg bluegrass 4%, Antennaria 2%

Table 5. Canopy Cover from Sage-grouse Habitat Assessments

Plant Type	Pasture 11	Pasture 21	Pasture 25
Shrub	Sagebrush 20% Bitterbrush 4%	Sagebrush 24% Rabbitbrush 10%	Sagebrush 24%
Large bunchgrass	Idaho fescue 8%	Bluebunch wheatgrass 2%	Bluebunch wheatgrass 6%
Medium bunchgrass	squirreltail 2%	0	0
Small bunchgrass	Sandberg bluegrass 32%	Sandberg bluegrass 26%	Sandberg bluegrass 28% Bulbous bluegrass 2%
Perennial forb	Four species 8%	Phacelia 2%	Antennaria 2%
Annual grass	cheatgrass 4%	cheatgrass 6%	cheatgrass 30%

Based on 2009 NAIP imagery, juniper encroachment is evident in portions of Pastures 4, 9, 11, and 19. Juniper encroachment is mostly patchy (Phase 1), but there are areas of Phase 2 juniper stands within these pastures, which is affecting the sagebrush and bunchgrass plant communities in those areas.

Noxious weeds mapped on public lands in BLM's GIS layer include whitetop (*Cardaria draba*) in Pastures 4, 11, and 14, and Russian knapweed (*Acroptilon repens*) in Pasture 14. Infestations have been and continue to be treated. Other noxious weeds, such as Scotch thistle (*Onopordum acanthium*) and leafy spurge (*Euphorbia esula*) are mapped adjacent to the Nickel Creek FFR Allotment.

Utilization monitoring at the end of the 2011 and 2012 grazing seasons showed overall light utilization, with no individual site readings over 40%, and several sites with little or no utilization (<7%).

In summary, vegetation conditions are similar to those in 2001/2003 except for localized increases in non-native annual grasses.

Evaluation Finding – Allotment is (check one):

- Meeting the Standard
- Not meeting the Standard, but making significant progress toward meeting
- Not meeting the Standard

Evaluation Rationale

Standard 4 is not being met in the Nickel Creek FFR Allotment. This is shown by the following indicators:

- Large bunchgrasses have been moderately reduced, when compared to reference conditions, in abundance and cover in plant communities where those grasses are expected to be sub-dominant with shrubs. Seed production of remaining large grasses is appropriate for site conditions.
- Of the smaller bunchgrasses, Sandberg bluegrass is somewhat increased compared to reference conditions; it (and cheatgrass) have increased as large bunchgrasses decreased. Squirreltail abundance is low, but similar to reference conditions.
- Native forb diversity and cover are somewhat reduced compared to reference conditions.
- Juniper canopy cover is higher than reference conditions in limited patches within the allotment.
- Basal perennial vegetation (particularly of large bunchgrasses) and biological soil crusts are somewhat reduced compared to reference conditions.
- Several invasive annual grasses are present in low to moderate abundance.

Shrub diversity and cover exhibited close to reference conditions across the allotment.

There is no indication of significant progress being made toward meeting Standard 4 because indicators of vegetation conditions are similar to the previous assessment with the exception of higher diversity and abundance of invasive annual grasses.

Determination:

Determination Finding: The Nickel Creek FFR Allotment is (check one or more):

- Meeting the Standard
- Not Meeting the Standard, but making significant progress toward
- Conforms with Guidelines for Livestock Grazing Management
- Not Meeting the Standard; Current Livestock Grazing Management Practices are Significant Factors
- Not Meeting the Standard; Current Livestock Grazing Management Practices are **not** Significant Factors
- Does not conform with Guidelines for Livestock Grazing Management Guidelines No(s)._____

Determination Rationale

Standard 4 is not being met throughout the allotment. The primary causes for not meeting are historic grazing and invasive plants.

Current grazing management is not a significant causal factor because use is relatively light (no more than 40% in all fields visited in 2011 and 2012), particularly during the critical growing season. Grazing is not limiting seed production, based on sage-grouse habitat assessments and Rangeland Indicators data. The current system conforms with Idaho Guidelines for Livestock Grazing Management as it relates to this Standard because the system provides for an appropriate level and season of use to maintain adequate perennial plant vigor for seed production, seed dispersal, and seedling survival relative to the ecological site. The current utilization level is expected to allow for the native plant communities to compete with invasive plants.

The reduction in large bunchgrasses appeared to be the result of past impacts because the vigor of the plants present was appropriate for the site, reflecting recent adequate to high precipitation, little current utilization at the time of evaluation, and recent years' grazing management. The shift in species composition (from more palatable decreasers like bluebunch wheatgrass to less palatable increasers such as Sandberg bluegrass and rabbitbrush) has occurred due to past grazing (over ten years ago), based on observed seed production. Historic and past grazing included higher intensity growing season use compared to current management, which led to the reduction of large, palatable bunchgrasses. Soil loss also reflects historic rather than current management because there is little evidence of current soil movement. Recent grazing practices are adequate for maintaining the current density of large bunchgrasses, but the combination of increasing invasive plants and historic soil loss are not allowing the plant communities to make significant progress toward meeting Standard 4. While invasive plants do not dominate plant communities, they compete with native plants for water, nutrients, and light, precluding increases in desirable vegetation such as large bunchgrasses.

Standard 5 Seedings - Does not apply

Standard 6 Exotic Plant Communities - Does not apply

Standard 7 Water Quality

Overview

Stream drainages within the Nickel Creek FFR include Castle, Deep, Nickel, and Smith Creeks. Streams with designated beneficial uses are addressed under the Idaho Administrative Procedures Act (IDAPA) 16.01.02.140. All streams within the Nickel Creek FFR Allotment have general use designations for secondary contact recreation, agricultural water supply, wildlife habitat, and aesthetics. Deep, Nickel, and Smith Creeks have been assigned additional beneficial uses that include cold water aquatic life and salmonid spawning. Castle Creek has been assigned the beneficial use of cold water aquatic life.

The Idaho Department of Water Quality (IDEQ) identified Deep, Nickel, and Smith Creeks as not fully supporting cold water aquatic life and salmonid spawning beneficial uses, and Castle Creek was not fully supporting cold water aquatic life beneficial use. Consequently, these streams are on the State of Idaho's 303(d) list as water quality limited due to excess sediment/siltation and water temperatures. Total maximum daily loads (TMDLs) were developed for sediment/siltation and stream temperature in Deep, Nickel, Smith, and Castle Creeks.

Livestock grazing is the major land use in the area. Of the approximate 4 miles of streams within the allotment, about 1.5 miles are livestock accessible while the other reaches are inaccessible either due to fencing or topography (see Table 2).

Evaluation:

The 2003 Determination, IDEQ water standard information, the Upper Owyhee River TMDL Five Year Review (2009), lotic PFCs and 2011 field observations are used to evaluate the water quality standard. Indicators for evaluating the standard include the physical, chemical, and biologic parameters described in the Idaho Water Quality Standards. These standards were evaluated using surrogates that included the density and health of herbaceous and woody riparian vegetation, evidence of high concentrations of livestock use in the waterway, turbidity, and fine sediment deposits in the channel.

The 2003 determination identified that elevated stream temperatures were probably the result of the loss of shade-producing vegetation such as shrubs and herbaceous grasslike species at the water's edge. Utilization studies indicated herbaceous and shrub species commonly have been utilized heavily along Smith and Castle creeks. Additionally, streambank alteration caused by livestock trampling (pugging, shearing, trampling) tends to increase stream width and decrease depth, which exposes more water to solar radiation thus increasing water temperature. Streambank alteration also contributes to unstable streambanks and increased sediment delivery. Elevated water temperatures and sediment in Deep Creek are thought to be primarily the result of land use practices on adjacent, upstream grazing allotments and private lands.

Lotic PFC data from 2011 in a 0.32 mile reach of Castle Creek and 0.5 mile reach of Smith Creek identified signs of historic excessive erosional events (channel entrenchment) and heavy sediment bedload in the channels. Excessive erosion still occurs on many of the cut banks. However, riparian areas are widening and re-vegetating with willows, sedges and rushes whose root masses are sufficient to hold bank sediment during high flow events. Riparian vegetation appeared healthy with high vigor. Riparian vegetation was re-establishing and beginning to stabilize gravel/sand bars. Additionally, there is a small reservoir approximately 0.7 miles upstream on Castle Creek that controls flows in that reach from 4/01-10/3. Many years that reach is completely dry in July because of the irrigation diversion, and the only water this segment receives is from the irrigation excess.

Upper Owyhee River Five Year Review (IDEQ 2009) identified that Deep Creek and Castle Creek (3rd order) reaches in the Nickel Creek FFR have improving water quality trends as related to sediment and stream temperature TMDLs, and Nickel and Smith creeks have static water quality trends as related to sediment TMDLs. Also, IDEQ stated the stream temperature targets were unattainable, and recommended re-writing the temperature TMDL using the 'potential natural vegetation' approach that uses shading as a surrogate for temperature.

Evaluation Finding – Allotment is (check one):

Meeting the Standard

Not meeting the Standard, but making significant progress toward meeting

Not meeting the Standard

Evaluation Rationale

Riparian vegetation (sedges, rushes, and young willows) is establishing on sand bars and bedload deposits in Smith and Castle creeks and is likely holding streambank sediments together during high flows. The indicators for Standard 3 that pertain to water quality (channel characteristics such as sinuosity and width-to-depth ratio) are not in balance with the landscape and will likely not be for many years due to the severity of channel entrenchment. Exposed soil within entrenched stream channels continues to be eroded during higher flows. However, the observed increase in riparian vegetation related to Standard 2 is improving streambank/sandbar stabilization and improving filtering capacity of riparian buffer strips between the uplands and streams. Additionally, the improving riparian communities increase stream shade and cool a portion of surface water. Idaho DEQ's five year review (IDEQ 2009) identified either improving or static water quality trends for the streams, while both lotic PFCs identified apparent upward trends for two streams. These results imply that the water quality is, at a minimum, being maintained.

Determination:

Determination Finding: The Nickel Creek FFR Allotment is (check one or more):

- Meeting the Standard
- Not Meeting the Standard, but making significant progress toward meeting
- Conforms with Guidelines for Livestock Grazing Management
- Not Meeting the Standard; Current Livestock Grazing Management Practices are Significant Factors
- Not Meeting the Standard; Current Livestock Grazing Management Practices are **not** Significant Factors
- Does not conform with Guidelines for Livestock Grazing Management Guidelines No(s)

Determination Rationale

Standard 7 is not being met, as indicated by non-attainment of Idaho water quality standards. As described within Standard 3, the deeply entrenched channels, increased width-to-depth ratio, and excessive bedload (sediment) are contributing excess sediment to stream channels and increasing stream temperatures. Significant progress toward meeting Standard 7 is indicated by the presence of riparian vegetation that appears to be re-stabilizing streambanks and increasing the filtering capacity between upland contributions and stream channels. Riparian vegetation (both woody and herbaceous) is increasing and is also improving sandbar stabilization from what was reported in 2003 evaluations. Idaho DEQ's five year review (IDEQ 2009) identified either improving or static water quality trends for the streams, while both lotic PFCs identified apparent upward trends for two streams. These results imply that the water quality is, at a minimum, being maintained.

Standard 8 Threatened and Endangered Plants and Animals

Special Status Plants

Overview

Three BLM special status plants (SSP) have been recorded from within the Nickel Creek FFR Allotment boundaries. Mud Flat milkvetch, *Astragalus yoder-williamsii*, has been recorded on private lands in Pastures 6 and 11, and thinleaf goldenhead, *Pyrrcoma linearis*, was recorded on private lands in Pastures 11 and 14; both species were last recorded at these locations in 1992 and no current information is available. Short-lobed penstemon, *Penstemon seorsus*, was found

on public lands within Pasture 4 in 2011. See the Affected Environment section for Special Status Plants in the EA for additional information.

Evaluation:

Information sources used in evaluation of this Standard include the 2003 assessment, IFWIS data, and BLM monitoring records, along with utilization data and general vegetation conditions as discussed in Standards 2 (riparian areas) and 4 (uplands). Indicators used include the vigor of plants in recently observed occurrences, habitat quality relating to invasive plants, and the timing and degree of physical disturbance to plants and habitats.

The 2003 assessment mentions Mud Flat milkvetch, but there is no information on impacts or status of the occurrence.

IFWIS data records occurrences of Mud Flat milkvetch and thinleaf goldenhead from 1992 and earlier. Because no specific locations for these plants are known on public lands, general habitat conditions are used to evaluate potential effects. Mud Flat milkvetch habitat is openings within mountain or low sagebrush communities; this specific type of habitat has not been degraded by vegetation changes observed such as the reduction in large bunchgrasses (see Standard 4). Therefore, if Mud Flat milkvetch is present on public lands in this allotment, it is likely that its habitat is suitable to maintain viable populations of this plant. Likewise, riparian habitats are improving overall (See Standard 2), so if thinleaf goldenhead occurs on public lands in this allotment, its habitat would also be expected to be on an upward trend.

Short-lobed penstemon was observed in Pasture 4 in July 2011 (see BLM monitoring records). No impact from grazing or trampling (or other disturbance) was observed on the occurrence, and plants appeared healthy, although few. Only about 10 plants were seen in a cursory inventory of the area. Utilization of key species in that field (Field 4) was measured at 30% at the end of the 2011 season. Competition with weeds was not a substantial impact to the species at this site. It does not appear that grazing is limiting short-lobed penstemon or its habitat.

Evaluation Finding – Allotment is (check one):

- Meeting the Standard
- Not meeting the Standard, but making significant progress toward meeting
- Not meeting the Standard

Evaluation Rationale

Standard 8 is being met for SSP in the Nickel Creek FFR Allotment. Based on the limited information available, habitat for special status plants in the Nickel Creek FFR is suitable to maintain viable populations of these species, as shown by the following indicators.

- Plant vigor of the only recently observed occurrence (short-lobed penstemon) in the allotment was as expected, based on the number of flowering stems, although the number of plants seen was small.
- Invasive plants were few at the short-lobed penstemon occurrence area, having little impact on habitat.
- Based on the July 2011 observation, little or no grazing or other disturbance is occurring in the short-lobed penstemon occurrence area, allowing plants to grow, flower, and set seed.

- Habitats for Mud Flat milkvetch and thinleaf goldenhead, if present, are expected to be maintained or improved based on general vegetation conditions.

Determination:

Determination Finding: For special status plants, the Nickel Creek FFR is:

- Meeting the Standard
- Not Meeting the Standard, but making significant progress toward
- Conforms with Guidelines for Livestock Grazing Management
- Not Meeting the Standard; Current Livestock Grazing Management Practices are Significant Factors
- Not Meeting the Standard; Current Livestock Grazing Management Practices are **not** Significant Factors
- Does not conform with Guidelines for Livestock Grazing Management Guidelines No(s).

Determination Rationale

Standard 8 is being met for short-lobed penstemon because habitat conditions do not appear limiting for this plant, and grazing use of its habitat is light. Habitats for Mud Flat milkvetch and thinleaf goldenhead (if present) are expected to be suitable and/or improving conditions, also not limited by current grazing.

Guidelines for livestock management that relate to Standard 8 for SSP include:

- Apply grazing management practices to maintain adequate plant vigor for seed production, seed dispersal, and seedling survival of these plants.
- Apply grazing management practices that maintain or promote the physical and biological conditions necessary to sustain native plant populations.

Current livestock management in the Nickel Creek FFR Allotment conforms to these guidelines for livestock management because the level of use (based on utilization and few observed impacts) is sufficient to maintain adequate vigor for seed production, dispersal, and seedling survival. This timing and level of use are suitable to maintain the physical and biological conditions necessary for SSP populations.

Wildlife

Overview

Many wildlife species utilize a variety of habitats in the Nickel Creek FFR Allotment. These habitats provide forage, nesting substrate, and cover for a variety of bird, mammal, amphibian, reptile, and fish species common to southwestern Idaho and the Northern Great Basin region. Although all of the species are important members of native communities and ecosystems, most are common and have wide distributions within the allotments, state, and region. Consequently, the relationship of most of these species to the permit renewal is not discussed here in the same depth as species upon which the BLM places management emphasis.

The BLM, U.S. Fish and Wildlife Service (USFWS), and Idaho Department of Fish and Game (IDFG) maintain an active interest in other special status species that have no legal protection under the Endangered Species Act (ESA). BLM special status species are: 1) species listed or proposed for listing under the ESA, and 2) species requiring special management consideration to promote their conservation and reduce the likelihood and need for future listing under the ESA

(USDI BLM, 2008), which are designated as sensitive by the BLM State Director(s). Special status wildlife species discussed in this document include those listed on the Idaho BLM State Sensitive Species List (USDI BLM, 2003). Also considered are those species afforded protection under the Bald and Golden Eagle Protection Act (BGEPA) and the Migratory Bird Treaty Act (MBTA) with potential to occur within the Nickel Creek FFR Allotment and whose habitat may be affected by grazing activities.

No threatened or endangered species listed under the ESA occur in the Nickel Creek FFR Allotment. Two birds and one amphibian species listed as candidates under the ESA, and 7 mammals, 12 birds, one reptile, three amphibians, one fish, and one invertebrate with special status could potentially occur within the Nickel Creek FFR Allotment and may be affected by grazing activities. See Appendix F, Special Status Wildlife Species, in Environmental Assessment (EA) # DOI-BLM-ID-B030-2011-0006-EA, Nickel Creek FFR Grazing Permit Renewal EA for a list of special status wildlife species, their status, and occurrence potential within the Nickel Creek FFR Allotment.

With the exception of a few well-studied species, current occurrence and population data for most special status animal species within the Nickel Creek FFR Allotment is limited due to a deficiency of surveys and directed research. Therefore, only a few focal special status animal species will be discussed in detail individually. These species include the greater sage-grouse, Columbia spotted frog, and Columbia River redband trout. Other special status animal species, migratory birds, raptors, and species of socio-economic importance (e.g., big game) and their habitats will be included in discussions in the broader context of upland and riparian habitat conditions.

Evaluation:

Rangeland Health Standards (Standards) are interrelated, especially when addressing wildlife special status species requirements. Standards 1-7 provide the basis for healthy wildlife habitats that are suitable to maintain viable populations of threatened and endangered, sensitive, and other special status species. Indicators for Standard 8, Threatened and Endangered Animals include:

- Parameters described in the Idaho Water Quality Standards.
- Riparian/wetland vegetation with deep, strong, binding roots is sufficient to stabilize streambanks and shorelines. Invader and shallow rooted species are a minor component of the floodplain.
- Age class and structural diversity of plant species are appropriate for the site.
- Native plant communities (flora and microbiotic crusts) are maintained or improved to ensure the proper functioning of ecological processes and continued productivity and diversity of native plant species.
- The diversity of native plant and animal communities are maintained.
- The amount and distribution of ground cover, including litter, for identified ecological site(s) or soil-plant associations are appropriate for site stability.
- Noxious weeds are not increasing.

Upland Wildlife Habitat

Previous Assessment

The 2003 Assessment was based on nine rangeland indicators conducted in 2001. Standard 4 applied to all areas of the allotment. The 2003 Assessment described low sagebrush communities as showing slight-moderate departure from reference conditions, indicated by lower than expected large bunchgrasses and biological soil crusts, and higher than expected rock/gravel soil cover and sagebrush cover. Cheatgrass and juniper were present in some pastures, mostly at low levels. Species diversity and plant vigor were appropriate for the site. The Assessment described similar conditions in big sagebrush communities with slight-moderate departure from reference conditions, as shown by higher than expected Sandberg bluegrass and rabbitbrush, and lower than expected biological soil crusts and bluebunch wheatgrass, particularly in the interspaces. Both species diversity (including forb diversity) and Idaho fescue abundance were appropriate for the site. Cheatgrass and western juniper were present, with generally low cover.

Current Assessment

The 2011 rangeland indicators found conditions similar to those in 2001 at the four sites evaluated. Soil loss, invasive species, and reductions in large bunchgrasses (particularly bluebunch wheatgrass) showed departures from reference conditions. The reduction in large bunchgrasses appeared to be the result of past impacts because the vigor of the plants present was appropriate for the site, reflecting recent adequate to high precipitation, little current utilization at the time of evaluation, and presumably recent years' grazing management. Invasive species included Phase 1-2 juniper encroachment in some areas, and the presence (and in some cases abundance) of non-native annual grasses; these exotic grasses included several species not noted in the 2001 field evaluation. Based on 2009 NAIP imagery, juniper encroachment is evident in portions of Pastures 4, 9, 11, and 19. The majority of juniper encroached areas exhibit Phase 1 characteristics, but there are areas of Phase 2 juniper stands within these pastures, which is affecting the sagebrush and bunchgrass plant communities in those areas. See Standard 4 for additional information.

Focal Wildlife Species

Greater Sage-grouse

Historically, the Nickel Creek FFR Allotment provided suitable habitat for sage-grouse and the area supported significant populations. Currently, the majority of the allotment and surrounding areas are still providing suitable to marginal sage-grouse habitat. Based on an interim, updated (2013) version of the Idaho Sage-grouse Habitat Planning Map (ISHPM) completed by the Idaho Sage-grouse Advisory Committee (ISAC) (2006), approximately 60% (1,162 acres) of BLM land within the Nickel Creek FFR Allotment is currently classified as key sage-grouse habitat, and 38% (749 acres) is classified as conifer encroachment areas with high restoration potential. The remaining 2% (35 acres) of the Nickel Creek FFR Allotment is not considered sage-grouse habitat (see Table 6). Makela and Major (2012) identified approximately 23% (452 acres) of BLM lands within the Nickel Creek FFR Allotment as PGH and 77% (1,484 acres) as PPH. The habitat identified as PPH was further classified as 59% sagebrush and 41% conifer encroached areas.

Table 6. Sage-grouse habitat acreage on BLM lands within the Nickel Creek FFR Allotment

Pasture	Idaho Sage-grouse Habitat Planning Map				PPH/PGH Version 2	
	Sagebrush	Perennial Grassland	Conifer Encroachment	Total	PGH	PPH
4	42	0	61	103	123	0
6	13	0	34	47	47	0
9	4	0	110	114	119	0
11	276	0	221	497	163	334
14	150	0	323	473	0	473
19	287	0	0	287	0	287
21	105	0	0	105	0	105
23	51	0	0	51	0	51
24	43	0	0	43	0	43
25	191	0	0	191	0	191
Total	1,162	0	749	1,911	452	1,484

In 2012, BLM personnel conducted three sage-grouse habitat assessments within PPH on the Nickel Creek FFR Allotment (Table 7). Habitat assessments indicate that the majority of sites assessed are providing unsuitable (missing the majority of necessary indicators) to marginal (missing some necessary indicators) sage-grouse breeding and upland summer habitats within the allotment. Unsuitable to marginal sage-grouse breeding and upland summer habitat determinations were due to a reduction in large stature perennial bunchgrasses, dominance of Sandberg bluegrass in the understory, and low preferred forb diversity and abundance. Assessments also indicate that the allotment is providing suitable sage-grouse winter habitat at all sites assessed. No sage-grouse leks are known to occur within this allotment.

Table 7. 2012 sage-grouse habitat assessment seasonal habitat summary

Site	Ecological Site	Sage-grouse Seasonal Habitat Type		
		Breeding	Upland Summer	Winter
0657-11-11S04W14a-2012	Shallow Claypan 12-16"	Suitable	Suitable	Suitable
0657-21-12S03W15a-2012	Loamy 11-13"	Unsuitable	Unsuitable	Suitable
0657-25-13s03w22a-2012	Loamy 11-13"	Marginal	Marginal	Suitable

Evaluation Finding – Allotment is (check one):

Meeting the Standard

Not meeting the Standard, but making significant progress toward meeting

Not meeting the Standard

Evaluation Rationale

Upland Wildlife Habitat

The Nickel Creek FFR Allotment is managed as a native plant community and is not meeting Standard 4. Large stature perennial bunchgrasses have been reduced across the allotment and have been replaced by Sandberg bluegrass and/or cheatgrass. This vegetation community shift reduces effective nesting, escape, hiding, travel, and foraging cover values for wildlife species

associated with sagebrush steppe communities. Juniper encroachment is likely not reducing habitat requirements for big game and other large animals, but is contributing to a reduction in habitat for sage-grouse and other sagebrush obligate species. The majority of this allotment is failing to provide suitable upland habitat conditions for sagebrush steppe-associated wildlife, including sage-grouse, and therefore is not meeting Standard 8.

There is no indication of significant progress being made toward meeting Standard 8 because indicators of vegetation conditions are similar to the previous assessment with the exception of higher diversity and abundance of invasive annual grasses. While invasive plants do not dominate all plant communities within the allotment, they reduce effective nesting, escape, hiding, travel, and foraging cover values for wildlife species associated with sagebrush steppe communities.

Determination:

Special Status Animals

Determination Finding: The Nickel Creek FFR Allotment is (check one or more):

- Meeting the Standards
- Not Meeting the Standards, but making significant progress toward
- Conforms with Guidelines for Livestock Grazing Management
- Not Meeting the Standards; Current Livestock Grazing Management Practices are Significant Factors
- Not Meeting the Standards; Current Livestock Grazing Management Practices are **not** Significant Factors
- Does not conform with Guidelines for Livestock Grazing Management Guidelines No(s)

Determination Rationale

Upland Wildlife Habitat

Standard 8 is not being met in the Nickel Creek Allotment, as described above, and no significant progress in improving the health of upland wildlife habitat is indicated by available data. Current livestock grazing management does not appear to be a significant causal factor because light perennial grass utilization levels (not exceeding 38% in data available from 2011-2012) under current management appear suitable to maintain native plant communities.

Significant causal factors for not meeting Standard 8 are historic livestock grazing and invasive plants. Historic grazing (over 50 years ago) presumably included growing season use and a higher intensity of use (overstocking) than current management, which led to the reduction/loss of large, palatable bunchgrasses. Invasive plants have increased, in part, due to the reduction in large bunchgrasses as a result of historic grazing practices. Invasive plants compete with native plants for water, nutrients, and light, precluding increases in desirable vegetation such as large bunchgrasses.

The current grazing system conforms with the Idaho Guidelines for Livestock Grazing Management as it relates to Standard 8 because the system:

- Provides periodic rest or deferment during critical growth stages to allow sufficient regrowth to achieve and maintain healthy, properly functioning conditions, including good plant vigor and adequate vegetative cover appropriate for site potential.

- Maintains or promotes the interaction of the hydrologic cycle, nutrient cycle, and energy flow that will support the appropriate types and amounts of soil organisms, plants, and animals appropriate to soil type, climate and landform.
- Maintains adequate plant vigor for seed production, seed dispersal, and seedling survival of desired species relative to soil type, climate, and landform.
- Maintains or promotes the physical and biological conditions necessary to sustain native plant populations and wildlife habitats in native plant communities.
- Minimizes adverse impacts due to management fencing in order to maintain habitat integrity and connectivity for native plants and animals.

Evaluation:

Riparian Wildlife Habitat

Previous 2003 Assessment

The 2003 Assessment described portions of Smith, Castle, and Deep creeks located on public lands within pastures 6, 11, 19, and 21, totaling about 1.6 miles of stream. All segments that were evaluated for PFC were functioning at risk (FAR). Livestock use of riparian plant communities was the primary factor affecting the functioning condition of public land portions of Smith and Castle creeks in the allotment. High sediment delivery and deposition from upstream segments was the primary factor for the FAR condition of Deep Creek in pasture 21.

Current Assessment

Two lotic PFC assessments were conducted in 2011 on a 0.32 mile segment of Castle Creek in Pasture 14 and a 0.40 mile segment of Smith Creek in Pasture 11. Both were rated as FAR with apparent upward trends. This upward trend was due to expanding riparian plant communities, adequate plant vigor, and minimal impacts from livestock such as hoof shearing, heavy woody browse use, or heavy livestock utilization. Young willows and mature sedges and rushes were observed along both stream reaches and plant vigor was appropriate for the site. Deeply entrenched channels, increased width-to-depth ratio, and excessive bedload (sediment) were also documented.

Beneficial uses for the reaches of Castle and Smith creeks include cold water aquatic life and wildlife habitat. Beneficial uses for Deep Creek include cold water aquatic life, salmonid spawning, secondary contact recreation, and wildlife habitat. IDEQ's 305b list identifies the reaches of Castle, Smith, and Deep creeks as water quality limited and not fully supporting cold water aquatic life or salmonid spawning due to sedimentation and water temperature. Total Maximum Daily Loads (TMDLs) were developed for sediment and temperature on these reaches.

Focal Wildlife Species

Columbia spotted frog

Occurrence information available from IDFG documents six spotted frog observations on tributaries of the East Fork of Pleasant Valley Creek on private land within Pasture 9, two observations on Smith Creek in Pasture 11, and three observations on Beaver Creek on private land within Pasture 23 of the Nickel Creek FFR Allotment. Spotted frogs have also been documented on Stoneman, Current, and Deep Creek approx. 0.5 miles upstream from Pasture 6, Nickel Creek approx. 0.2 miles downstream from Pasture 4, and Castle Creek approx. 0.1 miles upstream from Pasture 19.

IDEQ's 305b list identifies the reaches of Castle, Smith, and Deep creeks as water quality limited and not fully supporting cold water aquatic life due to sedimentation and water temperature.

Columbia River Redband Trout

Within the Nickel Creek FFR Allotment, occurrence information available from IDFG documents redband trout in Current and Stoneman creeks which transect Pasture 6, Deep Creek which forms portions of the boundary of Pasture 6 and transects Pasture 21, Nickel Creek which transects Pasture 4 and forms portions of the boundary of Pastures 4 and 11, Smith Creek which transects and forms portions of the boundary of Pasture 11, Castle Creek which transects Pasture 19, and Beaver Creek which transects portions of Pastures 23 and 24. Redband trout are not known to occupy the intermittent and ephemeral streams within the remaining pastures.

IDEQ's 305b list identifies the reaches of Castle, Smith, and Deep creeks as water quality limited and not fully supporting cold water aquatic life or salmonid spawning due to sedimentation and water temperature.

Evaluation Finding – Allotment is:

Meeting the Standard

Not meeting the Standard, but making significant progress toward meeting

Not meeting the Standard

Evaluation Rationale

Riparian Wildlife Habitat

As discussed above, water quality parameters are not being met and cold water aquatic life is not fully supported in the reaches of Castle, Smith, and Deep creeks due to sedimentation and water temperature. Excess sediment and water temperature levels reduce habitat quality for Columbia spotted frogs, redband trout, and other riparian obligate wildlife species. Because these water quality parameters are not being met, the allotment is not meeting Standard 8 for riparian wildlife habitat

However, significant progress toward meeting Standard 8 is indicated by recent improvements in the reaches of Castle and Smith creeks. The 2003 Assessment rated these reaches as FAR, with no apparent trend. The 2011 PFC assessments rated both reaches as FAR with an apparent upward trend. Although PFC assessments do not directly assess riparian habitat suitability, stream-associated riparian areas that are in PFC generally provide adequate cover and other necessary riparian elements. While both reaches were not rated as PFC, improvements in functioning condition from FAR to FAR with an apparent upward trend does indicate significant progress toward meeting Standard 8.

Comparative photographs of the reach of Smith Creek taken during 1999 riparian inventory and 2011 PFC assessment monitoring also documents improvements in hydric vegetation along the length of the reach. Riparian vegetation (carex, rushes, and young willows) is establishing on sand bars and bedload deposits in Smith Creek. Improvements in existing deep rooted riparian vegetation also indicate significant progress toward meeting Standard 8.

Determination:

Determination Finding: The Nickel Creek FFR Allotment is (check one or more):

- Meeting the Standards
- Not Meeting the Standards, but making significant progress toward
- Conforms with Guidelines for Livestock Grazing Management
- Not Meeting the Standards; Current Livestock Grazing Management Practices are Significant Factors
- Not Meeting the Standards; Current Livestock Grazing Management Practices are **not** Significant Factors
- Does not conform with Guidelines for Livestock Grazing Management Guidelines No(s)

Determination Rationale

Riparian Wildlife Habitat

Standard 8 is not being met in riparian areas of the Nickel Creek FFR Allotment, as described above, but significant progress in improving the health of riparian wildlife habitat is indicated by recent improvements in PFC rating on Castle and Smith creeks and hydric vegetation along the reach of Smith Creek. Current livestock grazing management practices are not a significant causal factor for not meeting Standard 8 because little to no impact from livestock grazing was observed during field visits in 2011. The presence of dense herbaceous riparian vegetation with multiple age classes also indicates that current livestock grazing is not negatively impacting riparian vegetation along Smith and Castle creeks.

A significant causal factor for not meeting Standard 8 is that water quality parameters are not being met and cold water aquatic life is not fully supported in the reaches of Castle, Smith, and Deep creeks due to sedimentation and water temperature.

The current grazing system conforms with the Idaho Guidelines for Livestock Grazing Management as it relates to Standard 8 in riparian habitats because the system:

- Uses grazing management practices to maintain adequate amounts of ground cover to support infiltration, maintain soil moisture storage, and stabilize soils.
- Maintains or promotes grazing management practices that provide sufficient residual vegetation to improve, restore, or maintain healthy riparian-wetland functions and structure for energy dissipation, sediment capture, ground water recharge, streambank stability, and wildlife habitat appropriate to site potential.
- Maintains or promotes appropriate stream channel and streambank morphology and function.
- Implements grazing management practices that provide for compliance with the Idaho Water Quality Standards.

Summary of Evaluation and Determination

Check one box for each	Standards							
	1	2	3	4	5	6	7	8
	Watersheds	Riparian	Stream Channel	Native Plant Communities	Seedings	Exotics (not seeded)	Water Quality	T& E
Meeting the Standard								X Special Status Plants
Not Meeting the Standard, but making significant progress toward		X	X				X	X Special Status Riparian Wildlife
Not Meeting the Standard; current livestock grazing practices are not significant factors	X			X				X Special Status Upland Wildlife
Not Meeting the Standard; current livestock grazing practices are a significant factor								
Not Meeting the Standard; cause not determined								
Standard does not apply					X	X		
Guidelines for Livestock Grazing								
Conforms with Guidelines for Livestock Grazing Management?							Yes	
If no, list the Guidelines not in conformance: N/A								

/s/ Loretta V. Chandler
Field Manager

10/16/2013
Date

Appendix B – Response to Scoping Comments

Response to Comments on March 2011 Scoping for the Nickel Creek FFR Allotment

The following is in response to the Juniper Mountain Grazing Association (JMGA) LLC comments:

1. Comments 1, 1a, 1b, 3b, 4, 5a, and 6 expressed concerns regarding the information in the 2003 Rangeland Health Determination. Specifically, the monitoring information that was used when making the determination is stale in regards to the current conditions. JMGA also expressed concern that a universal determination for the Nickel Creek FFR was used for each Standard 1, 2, 3, 4, 7, and 8, and this universal determination did not apply to all pastures. *The OFO completed new field evaluations in 2011 and a new determination was completed in 2013. See Appendix A for the 2013 determination.*
2. Comments 1c, 2 and 2a expressed concern that the boundaries of the Nickel Creek FFR Allotment were not accurate, making the 2003 determination no longer valid. They also expressed concern that information in a July 8, 2010 letter sent to the BLM addressing boundary changes and acreages of private and public land was not used during scoping. *July 23, 2011 the BLM met with the Juniper Mountain Grazing Association members to address the Nickel Creek FFR boundaries. At this meeting, the members identified approximate location of internal and boundary fences. BLM staff field checked and GPSed fence locations in 2011. The GPS and GIS work and consultation with the members to verify fences modified the mapped allotment boundary and internal fences. These fence locations have been incorporated in this EA to more accurately represent the correct Nickel Creek FFR Allotment boundary and pastures. Acreages reflected in the EA are based on those updates. This is explained in Section 1.0 of the EA.*
3. Comments 5b and 6b questioned why the pastures were not meeting specific standards when the assessment showed minor or no departure from the reference conditions. *A minor departure from reference condition can result in the area not meeting standards when considered with resource objectives, and other qualitative and quantitative information. Appendix A explains areas of departure for each standard, and why applicable standards are not currently being met.*
4. Comments 7 and 7A question the Preliminary Resource Issues part of the scoping document. They felt it mis-characterized the issues within the allotment and that the preliminary resource issues should be put into perspective. *The information has since been updated, as described in Section 1.0 of the EA. See also the 2013 determination in Appendix A.*
5. Comments 8 and 9 question the proposed Alternatives A and C. *These were preliminary alternatives that the BLM was requesting comments on. These two alternatives have been modified to reflect JMGA's comments along with other concerns.*

6. Comment 10 asked for the Nickel Creek FFR to continue to be managed at the discretion of the permittee, with periodic deferred grazing in selected pastures. *This comment was considered when developing Alternative B. See Section 3.0 of the EA.*

Western Watershed Project (WWP) provided numerous comments. The following is a summary of comments specific to the scoping document and relevant to the purpose and need of the proposed action.

1. The BLM must analyze the full range of direct, indirect and cumulative impacts of grazing, vegetation killing, roading and other activities on Nickel Creek and the FFR at the same time. *BLM has considered the cumulative impacts of other activities (including grazing on adjacent allotments, roads, and vegetation treatments) along with the direct and indirect effects of the alternative grazing systems analyzed, as required by NEPA. See Section 4 of the EA.*
2. WWP asked for BLM lands to be fenced off from the private lands and incorporated in the larger Nickel Creek Allotment. *See Section 2.2 for alternatives considered but not analyzed in detail.*
3. WWP wanted to know where all the detailed monitoring is. *This information was provided in a recent FOIA and is also incorporated throughout the EA and the project record. See the vegetation, riparian, and wildlife sections of this EA.*
4. WWP was also concerned with weeds, trampling of soils, micro-biotic crusts, sage-grouse, and other wildlife species that have been impacted due to livestock grazing. They were also concerned that the FFR category allowed for harmful practices. *This information has been incorporated within this document and discussed in the affected environment and environmental effects of each alternative for relevant resources, as well as in the determination. Designation of the FFR category does not relate to the purpose and need for this analysis, but note that various alternative actions are proposed for this FFR allotment.*

The Idaho Department of Fish and Game asked for the BLM to be mindful of impacts livestock grazing may be having on BLM lands with respect to habitat for various wildlife species. *This comment was considered when developing alternatives. See Section 3.3 for the affected environment and environmental consequences of the alternatives on Wildlife.*

Appendix C

Plant Names Used in the Nickel Creek FFR Allotment EA

Common Name	Scientific Name	Life Form & Status (if any)
Basin big sagebrush	<i>Artemisia tridentata</i> ssp. <i>tridentata</i>	Native shrub
Big sagebrush	<i>Artemisia tridentata</i>	Native shrub
Bluebunch wheatgrass	<i>Pseudoroegneria spicata</i>	Native bunchgrass
Bulbous bluegrass	<i>Poa bulbosa</i>	Non-native bunchgrass
Bur buttercup	<i>Ceratocephala testiculata</i>	Non-native annual forb
Cheatgrass	<i>Bromus tectorum</i>	Non-native annual grass
Dense silkybent	<i>Apera interrupta</i>	Non-native annual grass
Flixweed	<i>Descurainia sophia</i>	Non-native annual forb
Idaho fescue	<i>Festuca idahoensis</i>	Native bunchgrass
“Japanese” brome	<i>Bromus commutatus</i>	Non-native annual grass
Low sagebrush	<i>Artemisia arbuscula</i>	Native shrub
Mountain big sagebrush	<i>Artemisia tridentata</i> ssp. <i>vaseyana</i>	Native shrub
Mud Flat milkvetch	<i>Astragalus yoder-williamsii</i>	Special Status native perennial forb
North Africa grass	<i>Ventenata dubia</i>	Non-native annual grass
Rabbitbrush	<i>Ericameria nauseosa</i> or <i>Chrysothamnus viscidiflorus</i>	Native shrub
Russian knapweed	<i>Acroptilon repens</i>	Noxious perennial forb
Salsify	<i>Tragopogon dubius</i>	Non-native annual forb
Sandberg bluegrass	<i>Poa secunda</i>	Native bunchgrass
Scotch thistle	<i>Onopordum acanthium</i>	Noxious biennial forb
Short-lobed penstemon	<i>Penstemon seorsus</i>	Special Status native perennial forb
Slickspot peppergrass	<i>Lepidium papilliferum</i>	Special Status native biennial forb
Squirreltail	<i>Elymus elymoides</i>	Native bunchgrass
Thinleaf goldenhead	<i>Pyrrocoma linearis</i>	Special Status native perennial forb
Tumble-mustard	<i>Sisymbrium altissimum</i>	Non-native annual forb
Western juniper	<i>Juniperus occidentalis</i>	Native tree
Whitetop	<i>Cardaria draba</i>	Noxious perennial forb

Appendix D

Soil series on public land and percent acres that soil series represents of the specific pasture within the Nickel Creek FFR Allotment.

Soil Series	Acres	Percent of Pasture
Pasture 4		
Hat-Avtable-Monasterio complex, 1 to 20 percent slopes	5	4%
Hurryback-Wickahoney association, 3 to 45 percent slopes	53	40%
Mulshoe-Squawcreek-Gaib association, 2 to 30 percent slopes	11	8%
Nipintuck-Squawcreek-Rock outcrop complex, 2 to 30 percent slopes	6	4%
Paynecreek-Northcastle-Blackwell association, 0 to 8 percent slopes	44	33%
Rubble land-Rock outcrop-Pachic Argixerolls complex, very steep	2	2%
Welch-Upcreek loams, 0 to 3 percent slopes	1	1%
Wickahoney-Budlewis complex, 1 to 10 percent slopes	10	8%
Pasture 6		
Hat-Avtable-Monasterio complex, 1 to 20 percent slopes	4	7%
Hat-Nagitsy-Rock outcrop complex, 5 to 50 percent slopes	1	1%
Hat-Rock outcrop-Nipintuck complex, 2 to 35 percent slopes	2	5%
Paynecreek-Northcastle-Blackwell association, 0 to 8 percent slopes	37	74%
Welch-Upcreek loams, 0 to 3 percent slopes	6	12%
Pasture 9		
Mulshoe-Squawcreek-Gaib association, 2 to 30 percent slopes	61	52%
Paynecreek-Northcastle-Blackwell association, 0 to 8 percent slopes	57	48%
Pasture 11		
Hurryback-Wickahoney association, 3 to 45 percent slopes	80	16%
Mulshoe-Squawcreek-Gaib association, 2 to 30 percent slopes	40	8%
Paynecreek-Northcastle-Blackwell association, 0 to 8 percent slopes	128	26%
Pixley-Barkley complex, 2 to 10 percent slopes	5	1%
Rubble land-Rock outcrop-Pachic Argixerolls complex, very steep	40	8%
Squawcreek-Avtable-Wagonbox complex, 1 to 15 percent slopes	145	29%
Squawcreek-Wickahoney stony loams, 1 to 20 percent slopes	7	1%
Wickahoney-Budlewis complex, 1 to 10 percent slopes	53	11%
Pasture 14		
Hurryback-Wickahoney association, 3 to 45 percent slopes	12	3%
Mollic Haploxeralfs-Pachic Argixerolls complex, steep	76	16%
Mulshoe-Squawcreek-Gaib association, 2 to 30 percent slopes	47	10%
Pixley-Barkley complex, 2 to 10 percent slopes	163	35%
Rubble land-Rock outcrop-Pachic Argixerolls complex, very steep	3	1%
Squawcreek-Wickahoney stony loams, 1 to 20 percent slopes	63	13%

Soil Series	Acres	Percent of Pasture
Wickahoney-Budlewis complex, 1 to 10 percent slopes	108	23%
Pasture 19		
Fairylawn-Schnipper silt loams, 1 to 8 percent slopes	85	29%
Goose Creek loam, 1 to 3 percent slopes	7	3%
Mollic Haploxeralfs-Pachic Argixerolls complex, steep	17	6%
Perla-Ruclick complex, 2 to 12 percent slopes	48	17%
Rock outcrop-Xerollic Haplargids complex, very steep	107	37%
Weash-Schnipper complex, 1 to 8 percent slopes	24	8%
Pasture 21		
Fairylawn-Schnipper silt loams, 1 to 8 percent slopes	<1	<1%
Perla-Ruclick complex, 2 to 12 percent slopes	28	29%
Rock outcrop-Xerollic Haplargids complex, very steep	2	2%
Weash-Schnipper complex, 1 to 8 percent slopes	68	69%
Pasture 23		
Goose Creek loam, 1 to 3 percent slopes	<1	1%
Perla-Ruclick complex, 2 to 12 percent slopes	5	10%
Weash-Schnipper complex, 1 to 8 percent slopes	45	89%
Pasture 24		
Goose Creek loam, 1 to 3 percent slopes	5	11%
Perla-Ruclick complex, 2 to 12 percent slopes	1	2%
Pixley-Barkley complex, 2 to 10 percent slopes	26	60%
Weash-Schnipper complex, 1 to 8 percent slopes	12	27%
Pasture 25		
Babbington-Piline association, 0 to 3 percent slopes	<1	<1%
Deunah-Yatahoney-Lostvalley complex, 1 to 10 percent slopes	6	3%
Dougal-Bruncan stony sandy loams, 2 to 20 percent slopes	40	21%
Mollic Haploxeralfs-Pachic Argixerolls complex, steep	98	51%
Perla-Ruclick complex, 2 to 12 percent slopes	47	25%

Specific soil series on public land and percent the soil series represents on the entire Nickel Creek FFR Allotment.

Soil Series	Acres	Percent Pasture
Babbington-Piline association, 0 to 3 percent slopes	>1	>1%
Deunah-Yatahoney-Lostvalley complex, 1 to 10 percent slopes	6	>1%
Dougal-Bruncan stony sandy loams, 2 to 20 percent slopes	40	2%
Fairylawn-Schnipper silt loams, 1 to 8 percent slopes	85	4%
Goose Creek loam, 1 to 3 percent slopes	12	1%
Hat-Avtable-Monasterio complex, 1 to 20 percent slopes	8	>1%
Hat-Nagitsy-Rock outcrop complex, 5 to 50 percent slopes	1	>1%
Hat-Rock outcrop-Nipintuck complex, 2 to 35 percent slopes	2	>1%
Hurryback-Wickahoney association, 3 to 45 percent slopes	145	7%
Mollic Haploxeralfs-Pachic Argixerolls complex, steep	190	10%
Mulshoe-Squawcreek-Gaib association, 2 to 30 percent slopes	160	8%

Nipintuck-Squawcreek-Rock outcrop complex, 2 to 30 percent slopes	6	>1%
Paynecreek-Northcastle-Blackwell association, 0 to 8 percent slopes	266	14%
Perla-Ruclick complex, 2 to 12 percent slopes	129	7%
Pixley-Barkley complex, 2 to 10 percent slopes	194	10%
Rock outcrop-Xerollic Haplargids complex, very steep	109	6%
Rubble land-Rock outcrop-Pachic Argixerolls complex, very steep	46	2%
Squawcreek-Avtable-Wagonbox complex, 1 to 15 percent slopes	145	7%
Squawcreek-Wickahoney stony loams, 1 to 20 percent slopes	69	4%
Weash-Schnipper complex, 1 to 8 percent slopes	149	8%
Welch-Upcreek loams, 0 to 3 percent slopes	7	>1%
Wickahoney-Budlewis complex, 1 to 10 percent slopes	171	9%

Appendix E - Draft EA Comment Analysis

Nickel Creek FFR Grazing Permit Renewal - DOI-BLM-ID-B030-2011-0006-EA

October 15, 2013

The Draft Nickel Creek FFR Grazing Permit Renewal Environmental Assessment (EA), DOI-BLM-ID-B030-2011-0006-EA, was released for public review and comment on August 16, 2013. Comments were received from the following:

Juniper Mountain Grazing Association
Idaho Native Plant Society
Western Watersheds Project (WWP) – Katie Fite (multiple documents)
Idaho State Department of Agriculture (ISDA)
Owyhee Cattlemen’s Association
Owyhee County Farm Bureau

The following guidelines were used by Owyhee Field Manager and the Nickel Creek FFR Allotment Interdisciplinary (ID) Team in considering, reviewing, and responding to Draft Environmental Assessment (EA) comments. Relevant comments were either:

- 1) considered pertinent suggestions which could be incorporated into the alternatives;
- 2) considered as Other Alternatives Considered, but not analyzed;
- 3) considered as issues to be addressed in the effects analysis;
- 4) considered as indicators of where BLM needed to provide better clarification in the environmental assessment; or,
- 5) considered concerns in which BLM provided a specific response herein.

Various requests were made for additional data, mapping or other information to be included in the EA. Some of these requests were incorporated into the EA, others were outside of the scope or not relevant to the EA. Other requested information is available in the project record but is not pertinent to the discussions in the EA itself.

Comments were reviewed and summarized, by commenter, and responded to in the order listed above.

Juniper Mountain Grazing Association

1. **Comment:** The commenter indicates that the determination that Standards 1 and 4 are not making significant progress is an arbitrary finding since there is no trend monitoring data or other valid information to objectively evaluate watershed or upland trend.

BLM Response: Riparian or upland trend monitoring is a valuable tool to quantitatively evaluate if significant progress is being made toward the attainment of the particular Standard in question. However, it is not a required tool to determine if significant progress is being made or not. In accordance with BLM Handbook H-4180-1 – Rangeland Health Standards (2001), the BLM is responsible for selecting and identifying the appropriate indicators to evaluate each Standard and that adequate information was available to draw conclusions to the status of each

Standard. The BLM ID Team found that the data and information readily available for completing the 2013 Nickel Creek FFR Evaluation and Determination is adequate, further identifying that qualitative information was a contributing data source.

Evaluations were completed for portions of this FFR in 2003, 2011, and 2013 and were used by the ID Team to develop professional conclusions about conditions. The ID Team used best available information to make determination calls. This information is now explicitly listed in the Background section of the Evaluation/Determination (EA Appendix A). H-4180-1 specifically allows for the use of “professional judgment to draw conclusions where quantitative data does not lead to a hard conclusion” and that “quantitative monitoring data are not always required to complete an evaluation nor to implement actions to improve management”. The Nickel Creek FFR Evaluation and Determination has been updated to further describe the indicators utilized for each Standard and how the findings were made.

2. Comment: The commenter states that there is no valid rationale or necessity for changing management related to any range health standard or management objective. There is no valid reason to impose use standards when current management conforms to grazing guidelines or is already supporting significant progress toward standards. Additionally, inclusion of these terms and conditions sets the BLM up for failure due to a lack of adequate future assessment of such standards.

BLM Response: This comment will be taken into consideration in developing the Proposed Decision for Grazing Management of the Nickel Creek FFR Allotment. The BLM is responsible for developing a reasonable range of alternatives in the analysis for permitting activities on the public lands. In addition, the BLM’s stewardship responsibilities for the public lands extend beyond the minimal requirements found in the FRH Standards and the ORMP. Where there is opportunity to improve the health of the range, BLM has the authority and discretion to take that opportunity. Although current grazing management is not identified as a significant causal factor for the non-attainment of the Standards, the IDT has identified issues that could be addressed with some modification to Terms and Conditions of the existing permit and should at a minimum be analyzed for further consideration, BLM will hold itself responsible for completing appropriate assessment of the standards identified, if chosen in the grazing decision process.

3. Comment: The grazing schedule for pasture 4 on page 17 should not include field 1 because it does not contain any public land.

BLM Response: As outlined in Table 2.3 of the EA, Fields 1 and 2 of Pasture 4 are used at the same time (based on discussions of current management with permittee). Therefore, BLM could not separate management (or analysis) of this field from Field 2.

4. Comment: All of the T & C (terms and conditions) addressing a specific issue should be worded the same or a clear and concise explanation given for the difference.

BLM Response: Although some differences are necessary for the alternatives, terms and conditions have been made consistent to the extent possible between alternatives.

5. **Comment:** It is incorrect to state that the four terms and conditions described on page 17 were imposed on the Nickel Creek FFR by the US District Court. BLM determined that all four terms and conditions were appropriate and necessary when the court required use of one or more of the four. The terms and conditions are not applicable because a NEPA compliant permit renewal process was completed in 2003.

BLM Response: The terminology on page 17 has been updated in the EA. The terms and conditions remain applicable, however, because although the permit renewal process was undertaken in 2003, the decision was remanded back to the BLM and a new permit was not issued (see Section 1.0).

6. **Comment:** The commenter states that riparian browse utilization term and conditions should not apply to Alternative A since there is no related management issue addressed in the draft EA. Additionally, the 10% streambank alteration term and condition should not apply as it is not supported by scientific reference. If it is to be used, scientific studies linking the assessment methods and protocols to actual stream condition response specifically related to the 10% standard must be cited as well as the assessment methods and protocols to be used.

BLM Response: Alternative A is reflective of the Current Condition, which includes the 10% streambank alteration T&C. In addition, the 10% streambank alteration is identified as a management action for Riparian/Wetland and Fisheries resources under the ORMP. Analysis that references scientific studies was completed for the EIS associated with the ORMP and fully supports the use of this management action and T&C as a method to achieve riparian protection goals. Idaho Rangeland Health Standards that were used to evaluate the condition of Standard 2 for riparian systems within the Con Shea allotment are: riparian vegetative structure and function, age class and structural diversity of riparian vegetation, and presence of noxious weeds not increasing. The determination of not meeting Standard 2 would warrant the use of this T&C until riparian conditions are being met, even though the standard is not due to current grazing management.

7. **Comment:** In terms of monitoring (Management Common to All Alternatives), assessment methods must be based on an objective quantitative method and must acknowledge margin of error.

BLM Response: BLM Idaho relies on peer reviewed and scientifically based monitoring protocols when conducting monitoring. Some of these methodologies and protocols include, but are not limited to, those protocols outlined in Technical Reference (TR) 1734-3, 4 and 8, TR 1737-3, 5, 7, 9, 10 and 11.

8. **Comment:** The commenter points out that there is much speculation in the EA. Specifically, all of the speculation as to the effects of the various alternatives should be removed from the draft EA (Section 3.2.1). Speculation related to improved conditions relative to terms and conditions should also be supported by specific data or science references (p. 45). Much of the information related to Standard 8 is speculative even when discussing presence of some Special Status Species (p. 46-84).

BLM Response: Effects analyses in the EA are based on observed (current conditions from current management) and expected effects of the alternatives relating to proposed changes in management based on cited literature (as in Section 3.2.2) and professional judgment. Discussions on the presence of Special Status animals are based on the best available information, including potential habitat and the known range of the species (Section 3.3.1).

9. **Comment:** The commenter believes there is no rational basis to assume the management over the last 10 years will change so as to increase utilization (p. 42).

BLM Response: Because of the extensive private property associated with the Nickel Creek FFR, BLM can reasonably assume that property ownership, and thus the preference and/or permit, could transfer within a 10-year time period. This could result in a change in management. Additionally, membership of the Juniper Mountain Grazing Association could change at any time which could lead to a shift in management practices. For these reasons, it is not unreasonable for BLM to assume that management practices may change on the Nickel Creek FFR Allotment.

10. **Comment:** The discussions referencing the IDEQ water temperature standard is outdated. IDEQ is no longer (since July 2012) using the temperature criteria in their Owyhee River Watershed Temperature TMDL for the cold water biota beneficial use. BLM does not have the necessary information to determine whether the temperature standard is being met or not. This section (p. 43) needs to be updated or deleted.

BLM Response: IDEQ continues to list temperature as the pollutant of concern, but has chosen to utilize stream channel shade target as the indicator for whether the temperature parameters are within a natural margin of error. The TMDL states, “Assessment units with excess loads less than 10% (light green) should be considered in good condition. Because of the analysis methodology (see section 5.4.3), these streams may, in fact, be meeting their targets. In any case, they are within the margin of error of this method and should be treated with low priority” (IDEQ 2012). The tributary streams that are influenced by the Nickel Creek FFR fall within the assessment units described in the statement above found in the 2012 Owyhee River Watershed TMDL on pages 26 – 29 (IDEQ 2012).

11. **Comment:** The commenter indicates the discussion in Alternative C fails to acknowledge or address the increase in risk of wildfire associated with the absence of grazing, or the increased potential wildfire impact of private property within each pasture and field.

BLM Response: A discussion on the increased wildfire risk has been added to Section 3.1.2.4 and Section 4.1.

12. **Comment:** The speculation that greater improvement would be expected under alternative D is not supported by science references or by any specific data from the Nickel Creek FFR Allotment. There is no evidence in the record that the standards related to stubble height and woody utilization are not being met under Alternative A.

BLM Response: Section 3.2.2.5 identifies research that supports both woody vegetation and stubble height standards. Currently, as described in the determination, Standards 2 and 3 are not being met, as indicated by deeply entrenched channels, increased width-to-depth ratio, and excessive bedload (sediment). The conditions represented by these channel and riparian characteristics were caused prior to the last decade and current management is maintaining or improving Standards 2 and 3. This conclusion was based on the fact that only the young age class of willow was observed during the 2003 evaluation or the 2011 PFC assessment; inferring that willows that previously occupied this site were removed by either excessive grazing or mass erosion events. Significant progress toward meeting these Standards is indicated by the presence of herbaceous riparian vegetation that is re-stabilizing streambanks. Castle and Smith creeks are so deeply entrenched that it is unlikely either would be considered PFC in the near future due to their geomorphology. Both 2011 lotic PFC assessments identified an apparent upward trend. Riparian vegetation (both woody and herbaceous) increased and improved stabilization of sandbars from what was reported in 2003.

13. **Comment:** There is no data in the EA that supports the claim that Nickel Creek FFR historically provided suitable habitat and significant populations of greater sage-grouse (p. 49). Additionally, there is no data or other information in the EA supporting the claim that changing management that already conforms to policy in Manual 6840 would have any effect relative to that direction (p. 67). Additionally, there is no scientific reference relating to nesting cover for ground nesting birds or as to parasitism relative to a 6” riparian stubble height (p. 71).

BLM Response: Historical (pre-settlement) sage-grouse habitat and population descriptions are found in multiple sources cited within the EA. See Section 6.0. Information regarding current sage-grouse habitat conditions and environmental consequences resulting from grazing management alternatives can be found in Sections 3.3.1 and 3.3.2 respectively. References regarding migratory birds, raptors, and other avian special status species and environmental consequences resulting from grazing management alternatives can be found in Section 3.3.2.

14. **Comment:** The commenter points out that at page 70, the EA erroneously states that Alternative B differs from Alternative A by the addition of riparian utilization and stubble height terms and conditions and a specific season of use is not assumed or required. However, Alternative A does include stubble height and riparian utilization standards. This statement needs to be corrected.

BLM Response: This statement has been corrected.

15. **Comment:** The commenter discusses that any change in management of the Nickel Creek FFR would significantly affect management on the Nickel Creek Allotment, and that Alternatives C and D would prevent Juniper Mountain Grazing Association from meeting their terms and conditions associated with that permit.

BLM Response: Based on the Final Decision, the grazing system for the Nickel Creek Allotment is a separate and independent system from that for the Nickel Creek FFR Allotment. Therefore, changes to one system should not necessarily preclude attainment of terms and conditions. Also see BLM Response to WWP Comment 1 below.

16. **Comment:** A complete economic analysis needs to be completed for the analysis.

BLM Response: Although the commenter states that a complete economic analysis is necessary for the Nickel Creek FFR Allotment, it is unlikely that any of the alternatives analyzed would impact the socio-economic condition of the counties or communities within the analysis area, as identified in Section 1.5 of EA# DOI-BLM-ID-B030-2011-0006-EA. An analysis was completed to the point where it became evident that there was not enough difference among the alternatives by which a decision could be made. Therefore, the BLM did not undertake further analysis. As further identified in the EA, the BLM recognizes there may be impacts to the permittee and are discussed and considered in Section 3.4 “Grazing Management”.

Idaho Native Plant Society

1. **Comment:** Commenter expressed concern that the draft EA inadequately addressed impacts to special status (rare) plants and requested that the EA be revised to provide detailed consideration of the impact of each alternative on special status plants.

BLM Response: Information on special status plants (affected environment and environmental consequences of the alternatives) has been incorporated into Chapter 3 of the final EA in Section 3.4. The analysis includes a discussion of effects to the special status plants Mud Flat milkvetch, thinleaf goldenhead, and short-lobed penstemon.

Western Watersheds Project (WWP) – Katie Fite

1. **Comment:** Commenter believes that the Nickel Creek FFR Allotment is a linked or connected action to the Nickel Creek Allotment and that that this analysis should have included the Nickel Creek Allotment.

BLM Response: Although grazing management on the Nickel Creek FFR Allotment is a similar and associated action to grazing management on the Nickel Creek Allotment, it is not a connected action. Grazing would occur on the Nickel Creek Allotment even if there was no grazing on the Nickel Creek FFR Allotment, and conversely, grazing would still occur on the Nickel Creek FFR Allotment if there was no grazing on the Nickel Creek Allotment.

2. **Comment:** Commenter indicates that a broad range of alternatives must be considered, including fencing out of private lands within the Nickel Creek FFR Allotment and incorporating the BLM lands into the Nickel Creek Allotment. BLM should eliminate FFRs. BLM should consider elimination of grazing from significant areas where conflicts with wildlife or other values are high.

BLM Response: The BLM considered a total of ten alternatives (see Sections 2.2 and 2.4), including an alternative to fence the private lands and incorporate BLM lands into the Nickel Creek Allotment but this alternative was not considered in detail (see Section 2.2).

3. **Comment:** Commenter believes that BLM must prepare an EIS to adequately address the direct, indirect and cumulative effects associated with this action.

BLM Response: BLM believes that adequate grazing management changes in the Nickel Creek FFR Allotment can be made within the scope of an EA as there is no federal action that would significantly affect the quality of the human environment (as identified in 40 CFR 1508.27).

4. **Comment:** Commenter states that the Nickel Creek FFR EA lacks an adequate inventory and analysis of exotic weed species, including (but not limited to) bulbous bluegrass, cheatgrass, medusahead, etc. This information is necessary to analyze effects of invasive/exotic species on sage-grouse, migratory bird species, pygmy rabbits, watershed stability, recreational used and other important values associated with public lands. The increase in invasive species since the completion of the ORMP adds to the significance of the action and the need for a detailed and hard look at invasive species.

BLM Response: The EA uses best available information, including BLM's noxious weed inventory, current vegetation maps, sage-grouse habitat assessment data, and vegetation notes and photos from field visits and Rangeland Indicators, as listed in the Background section of the updated Evaluation/Determination (EA Appendix A). The available information is adequate to evaluate effects of the alternatives. Analysis of effects of exotic weed species to vegetation resources is found in Section 3.1.2 and these effects would also influence wildlife habitat, watersheds, and recreation as discussed in those sections.

5. **Comment:** Commenter questions the validity and adequacy of the Ecological Site Inventory information used and insists that BLM cannot claim that FRH (Fundamentals of Rangeland Health) standards are not met because of juniper expansion.

BLM Response: The Nickel Creek FFR EA cites the Ecological Site Descriptions in the Owyhee County Soil Survey, which was prepared by the USDA-NRCS. BLM relied on science from the NRCS as it is scientifically based and unbiased. BLM does not claim that these lands "should have no trees" but believes that juniper densities should be somewhat consistent with levels identified in the ecological site descriptions prepared by the USDA-NRCS.

6. **Comment:** BLM must fully examine the effects of climate change.

BLM Response: Section 1.5 of the EA has been updated to address climate change.

7. **Comment:** Commenter asks that the BLM identify when, where and how BLM determined historic grazing effects and how historic effects are separated from current grazing effects.

BLM Response: The EA (Section 3.1.1) and Evaluation/Determination (Standard 4) identify effects from past (greater than 10 years ago) grazing as leading to the observed reduction in large bunchgrasses. Past grazing includes pre-Taylor Grazing Act (1934) unregulated grazing up to grazing management before the previous Determination (2003); such grazing use was of a heavier intensity and longer season of use than current management (see EA Appendix A).

Current grazing effects are evaluated based on 2011 Rangeland Indicators and associated photo documentation along with 2011-2012 utilization.

8. **Comment:** Commenter requests that information on when and where all data was collected, who was involved and methods used be disclosed in the EA. Commenter also requests results of Court's riparian monitoring, as well as information on how timing of monitoring relates to grazing periods. Commenter questions the period of time that lentic assessments were conducted in 2003 versus 2011, and where a systematic analysis of all springs, seeps and wet meadows is located.

BLM Response: Information requested by the commenter is available within the Project Record for the Nickel Creek FFR Permit Renewal (or at the OFO). While the results of the data were used in the analysis, a listing of specific methodology for data collection (including those involved in data collection) does not add value to the EA or the decision to be made.

9. **Comment:** Commenter indicates that the EA fails to demonstrate the proper carrying capacity, stocking rate, capability and suitability of the allotment. They feel that the utilization levels, season of use and other aspects are outdated and do not comply with the needs for rare and sensitive species like sage-grouse needs for residual nesting cover. They also indicate that BLM provides no data or analysis of the total number of cattle being grazed in each FFR parcel that includes BLM, private and potentially state lands. It is unclear how many grazing (and trailing) bouts any pasture may receive.

BLM Response: As indicated in the EA, a total of 109 AUMs are authorized under the alternatives (excluding Alternative C) but because it is an FFR, numbers of livestock are not identified for the allotment. BLM does not prescribe or manage livestock use on private lands associated with the Nickel Creek FFR; therefore, BLM cannot prescribe a total number of livestock for the allotment. The stocking rate is determined to be appropriate for the site based on the observed utilization rates. Table 2.3 in the EA clearly identifies specified duration and frequency of use for each field in each pasture. The seasons of use and utilization rates are appropriate for maintaining perennial vegetation and thus wildlife habitat based on literature (e.g. Holecheck et al 1999 and Holecheck et al 2006; see Section 3.3.2.1). The BLM lands within the allotment have been identified as capable and suitable of supporting livestock grazing in the ORMP.

10. **Comment:** Commenter believes that utilization levels proposed in the EA do not provide sufficient protection for nesting and brood-rearing habitat for sage-grouse; they propose a 9-inch residual stubble height and no grazing March 1 through late June to protect that habitat. They are also concerned that BLM has not accurately mapped sage-grouse habitats and that "BLM may have cherry-picked sage-grouse assessment sites in areas in better condition – thus downplaying invasive annual grass and other weeds being promoted by livestock grazing disturbances."

BLM Response: Information regarding sage-grouse habitat requirements, mapping efforts and assessments can be found in Section 3.3.1. Although comprehensive, site-specific inventories

have not been conducted within the entire allotment and surroundings, the information available is sufficient to evaluate effects of the alternatives analyzed.

11. **Comment:** Commenter questions “what happened with the 2010 process”, and how the data collected then differs from current information.

BLM Response: It is unclear what “process” the commenter is referring to. Scoping for this EA was initiated in March of 2011. As discussed in Section 1.0 of the EA, a decision issued in 2003 was remanded by the Court and BLM agreed to complete new analysis.

12. **Comment:** Commenter believes that BLM has not balanced the needs of riparian and upland species, their habitat and population needs with grazing disturbance.

BLM Response: Sections 3.3 and 4.3 discuss direct, indirect and cumulative effects of each alternative on special status, focal and other wildlife species and their habitats.

13. **Comment:** Commenter asks that the alternative concepts and restoration and mitigation actions that they submitted for Toy Mountain, South Mountain et al be considered.

BLM Response: See Section 2.2 of the EA. The alternative submitted by the commenter for this analysis is similar to the Toy Mountain and South Mountain alternatives.

14. **Comment:** Commenter disagrees that Watershed standard (FRH at 3) is being met. There is no evidence of recovery of microbiotic crusts and invasive species were found at all stops in 2011. Commenter believes it is arbitrary, capricious and blatant for BLM to claim “progress” is being made in watershed conditions. The only progress appears to be rampant invasive species proliferation and streams drying up. The exotic species proliferation also shows that the standards for native vegetation and sensitive species habitats (4 and 8) are NOT being met, and conditions are worsening.

BLM Response: The 2013 Evaluation/Determination does not indicate that Standards for Watersheds (1), Native Plant Communities (4), or Special Status Upland Wildlife (8) are being met or making significant progress. It does indicate that upland vegetation conditions are generally similar to the 2003 Assessment conditions (EA Appendix A).

Riparian conditions have improved since the previous Assessment/Determination, so the allotment was determined to be making significant progress toward meeting Standards 2 (Riparian), 3 (Stream Channel), 7 (Water Quality), and Special Status Riparian Wildlife (8) (EA Appendix A).

15. **Comment:** Commenter questions BLM’s analysis of juniper encroachment on the allotment and feels that BLM has not analyzed the historical vegetation conditions on the site.

BLM Response: Juniper encroachment, as discussed in the EA, is based on a comparison of the ecological sites’ expected vegetation and existing vegetation mapping. Historical (pre-settlement) vegetation conditions are based on ecological site descriptions. See Section 3.1.1.

16. **Comment:** Commenter believes the determination is arbitrary and that BLM “provides no scientific basis for finding that in an area where there has been rampant increase in invasive species since the previous assessment and no healing of crusts – somehow livestock grazing is not causing this.” Commenter believes that in regard to the FRH findings, BLM ignores the direct, indirect and cumulative impacts of livestock grazing and trampling disturbance in promoting invasive species.

BLM Response: As explained in the EA and Appendix A, the Determination calls (not meeting Standards 1, 4, and 8 Wildlife) are based on observed, current vegetation conditions, using specific indicators. The determination of causal factors is based on observed utilization and reported season of use. Direct, indirect, and cumulative effects of grazing on invasive species are discussed in Sections 3.1.2 and 4.1.

17. **Comment:** BLM tries to use utilization monitoring at the end of the season – which must mean end of grazing season – to try to support its flawed FRH analysis. “End of season utilization provides no information at all of the degree and severity of cattle use that occurred during spring grazing periods.”

BLM Response: Utilization on the Nickel Creek FFR was measured in May, October and November 2011 and October 2012. Results of monitoring conducted in May were in the slight category (0-20%). BLM attempts to monitor utilization within two weeks of livestock leaving a pasture, but based on the number of pastures to monitor and allotment priority, not all pastures are monitored within that timeframe. Although it is considered, utilization is not the only indicator used in determining whether a standard is met or not as pointed out in the 2013 Evaluation and Determination for Nickel Creek FFR (p. 9).

18. **Comment:** Commenter indicates that “BLM’s FRH consideration of water quality greatly fails to provide necessary data and analysis of the direct, indirect, cumulative and synergistic effects of grazing manure, sediment, stripping of riparian vegetation, loss of perennial flows thus concentrating vile polluted waters even more, loss of functioning across entire watersheds, temperature exceedances, etc. related to livestock grazing effects... Necessary site-specific data and analysis have not been conducted, including in relation to livestock use periods.”

BLM Response: Page 40 of the EA states, “Approximately 4 miles of streams on public land are within the Nickel Creek FFR Allotment. Of those streams, about 1.5 miles are accessible by livestock while the remainder are inaccessible due to either fencing or topography. Stream drainages include Castle, Deep, Nickel, and Smith creeks. No known springs occur on public lands within the allotment.” Evaluations within the Nickel Creek FFR were completed in 2003, 2011, and 2013. PFC assessments were conducted for the Nickel Creek FFR. These assessments focused on the 1.5 miles of livestock accessible riparian areas within the FFR. The BLM also relies on regulatory agency updates to water quality evaluations. Page 42 of the EA states, “Upper Owyhee River Five Year Review (IDEQ 2009) identified that Deep Creek and Castle Creek (3rd order) reaches in the Nickel Creek FFR have improving water quality trends as related to sediment and stream temperature TMDLs, and Nickel and Smith Creeks have static water quality trends.” The Owyhee River Watershed TMDL states, “Assessment units with

excess loads less than 10% (light green) should be considered in good condition. Because of the analysis methodology (see section 5.4.3), these streams may, in fact, be meeting their targets. In any case, they are within the margin of error of this method and should be treated with low priority” (IDEQ 2012). The tributary streams that are influenced by the Nickel FFR fall within the assessment units described in the statement above found in the 2012 Owyhee River Watershed TMDL on pages 26 – 29 (IDEQ 2012).

19. **Comment:** Commenter states that BLM did not conduct adequate current baseline and site-specific inventories for rare plants and animals across the FFR and Nickel Creek allotment and its surroundings.

BLM Response: The EA is based on best available information, including rare plant and animal inventories and incidental observations. Although comprehensive, site-specific inventories have not been conducted within the entire allotment and surroundings, the information available is sufficient to evaluate effects of the alternatives analyzed.

20. **Comment:** BLM fails to provide evidence that meadow habitats are “improving overall”.

BLM Response: The evaluation and determination for Standard 1 has been updated with a more detailed discussion of observations and information utilized to evaluate meadow systems.

21. **Comment:** Commenter indicates that “full analysis of all the direct, indirect and cumulative effects of livestock facilities, grazing private, state lands and surrounding BLM allotments including FRH violations, invasive species, fire, treatment-caused weeds, etc. must be assessed in great detail.”

BLM Response: Livestock facilities are discussed in Sections 3.5 and 4.4 of the EA. BLM does not analyze grazing on private or state lands. All resources analyzed consider surrounding allotments in the cumulative effects section of the document (4.0). Invasive species and fire are discussed under various resources in Sections 3.0 and 4.0.

22. **Comment:** Commenter states that BLM has failed to provide an adequate current baseline for understanding effects of grazing disturbance, fire, treatments, inadequate post-fire rest across this landscape in impacting sage grouse and other sensitive species habitats and populations.

BLM Response: The EA is based on best available information, including animal inventories and incidental observations. Although comprehensive, site-specific inventories have not been conducted within the entire allotment and surroundings, the information available is sufficient to evaluate effects of the alternatives analyzed.

23. **Comment:** Commenter requested additional information in the EA, including more informative maps, locations of monitoring sites and information regarding how they were selected, results of monitoring conducted, infrastructure locations,

BLM Response: BLM has incorporated relevant information and mapping for the analysis of Nickel Creek FFR. Additional information requested is available at the Owyhee Field Office.

24. **Comment:** Commenter inquires about status of regional sage grouse and redband trout populations.

BLM Response: The status of regional sage-grouse and redband trout populations are discussed in the EA in Sections 3.3 and 4.3. The EA is based on best available information, including animal inventories and incidental observations. Although comprehensive, site-specific inventories have not been conducted within the entire regional area, the information available is sufficient to evaluate effects of the alternatives analyzed.

25. **Comment:** Commenter requests an evaluation of all range improvements within the allotment.

BLM Response: BLM is not proposing new improvements within the allotment; T&Cs exist (along with cooperative range improvement agreements and/or range improvement permits) that describe maintenance procedures. Past, present and reasonably foreseeable future range improvements developed on public lands have been analyzed in Section 4.0 of the EA.

26. **Comment:** BLM must develop passive and active restoration plans that provide assurance of protection and restoration of sensitive sagebrush ecosystems and juniper habitats for migratory birds and other wildlife through an EIS.

BLM Response: This comment is addressed in Section 2.2 of the EA; also refer to BLM Response for WWP Comment #3. While such actions are not completely outside the scope of this analysis, they are more appropriate on a site-specific basis. In addition, there are various projects in the stated ecosystems and habitats, across various ownerships, which are actively addressing such issues and are analyzed under cumulative effects.

27. **Comment:** Commenter states that the no grazing alternative must be addressed.

BLM Response: The No Grazing Alternative (Alternative C) is described in Section 2.4.3 and analyzed in Sections 3.1, 3.2, 3.3, 3.4, 3.5 and 3.6.

28. **Comment:** An ACEC designation must be considered.

BLM Response: This comment has been addressed in Section 2.2 – Alternatives Considered but Not Analyzed in Detail.

29. **Comment:** Commenter provided an alternative for removal of grazing from sensitive areas, with limitations on any grazing use that may continue. Active and passive restoration actions are discussed that allow restoration of native vegetative communities and watersheds.

BLM Response: The alternative proposed by the commenter was incorporated into the Final EA in Section 2.2.

Idaho State Department of Agriculture (ISDA)

1. **Comment:** Commenter pointed out acreage error in Table 1.1.

BLM Response: Acreage calculations are based on GIS calculations and rounding errors may exist. The EA has been updated to reflect this possibility and values associated with the table have been rechecked and verified.

2. **Comment:** Commenter disputes that Standards 1, 4 and 8 are not making significant progress toward meeting standards and specifically references sections of the EA (pps. 28, 32, 36) that substantiate their comment, as well as points out sections of the EA that are contradictory to the determination that significant progress is not being made toward meeting those standards (pps 34-35).

BLM Response: As explained in the EA and Appendix A, the Determination findings (not meeting Standards 1, 4, and 8 Wildlife) are based on observed, current vegetation conditions, using specific indicators. None of the indicators showed measurable or observable improvement over the time period evaluated, resulting in no indication that significant progress toward meeting these Standards is being made (EA Appendix A).

Responses to comments on specific pages follows:

- Page 28: “..fairly minor departures evident in plant community cover types..”. This clearly refers only to **cover** type (that is overstory vegetation such as juniper, sagebrush, or annual grass). This means that there have not been major vegetation type conversions within the Nickel Creek FFR, such as a lot of sagebrush being replaced by juniper or annual grass stands. The plant community alterations that indicate failure to meet Standards are in the amount and dominant species of large bunchgrasses within stands that are still sagebrush.
- Page 32: “...current livestock grazing management has generally resulted in light use..”. Utilization figures were used to determine **causal factors** for meeting/not meeting Standards, but indicators of the vegetation condition alone were used to determine whether the Standard was being met or making significant progress. For further response to utilization, see BLM Response to ISDA Comment #8.
- Page 36: “...plant community structure is expected to remain healthy..”. This sentence has been edited to better capture the intent of the analysis.

3. **Comment:** Commenter indicates that BLM arbitrarily assumes that the permittee’s proposal (Alternatives analyzed but not considered in detail) would not meet standards, even though they have established and maintained a good record of stewardship over the past decade.

BLM Response: BLM does not dispute the permittee’s record of performance. However, BLM is tasked with ensuring that management of BLM public lands is consistent with the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management. Because ownership of the private property or membership of the grazing association could change over the term of the permit, BLM correctly assumes that current management of the allotment could

change. Additional rationale is also provided in Section 2.2 of the EA and in the BLM Response to Juniper Mountain Grazing Association Comment 9.

4. **Comment:** Commenter states that use of grazing indicators, such as stubble height, streambank disturbance, woody utilization and upland utilization are not appropriate for use as performance standards initiating immediate adverse administrative actions on a grazing permit when any of these factors are exceeded and should not be used as terms and conditions on grazing permits (ISDA referenced BLM-IM-ID-2005-074).

BLM Response: Comment noted.

5. **Comment:** BLM's assumptions and speculations of declines in rangeland health, excessive utilization and declines in deep-rooted bunchgrasses and forbs which will occur without the 4 terms and conditions is unfounded and not an accurate assumption based on permittee's management over the past decade.

BLM Response: See BLM Response to ISDA Comment #3.

6. **Comment:** Alternatives B and D should clearly state that the alternative applies only to public lands within the allotment or pasture. All BLM alternatives must clearly state upfront that the alternative will apply only to the public land portions in each pasture of the Nickel Creek FFR Allotment.

BLM Response: BLM acknowledges T&Cs outlined in these alternatives only apply to BLM public lands within the allotment or pastures. Additional clarification has been added in sections 1.1, 1.2, and 2.0 of the EA.

7. **Comment:** Alternative C (the no grazing alternative) should analyze the increased risk of wildfire due to fuel buildup, demonstrate how it will provide protection from fragmented habitats, how habitat loss and fragmentation will be minimized, and how greater sage grouse habitat will be maintained, enhanced or restored to meet their life history needs (ISDA references BLM-IM-2012-043).

BLM Response: A discussion on the increased wildfire risk has been added to Sections 3.1.2.4 and 3.3.2.3.

8. **Comment:** Utilization levels indicated in the EA reflect no (0-5%) to light (21-40%) use and not moderate use (41-60%) as claimed on page 67 of the EA. BLM indicates that according to Holechek, 30-35% utilization is necessary to improve health and vigor of bunchgrasses and other range vegetation and demonstrates in Table 3.4 that most utilization falls within or under this range. Therefore, significant progress is occurring under current management and will continue to be made under current management.

BLM Response: Although 2011-2012 utilization figures are all below 40% (EA Table 3.4), Alternative A allows up to 50% (moderate) utilization, and thus effects from moderate utilization are analyzed under Alternative A. Significant progress toward meeting Standards would be

shown by changes in vegetation/soils/habitat conditions: that is, improvements in the specified indicators. Since no such improvement in indicators was observed, no significant progress was determined. The observed utilization figures indicate that current livestock grazing is not a significant causal factor for not meeting the Standards, but do not indicate that significant progress is being made.

9. **Comment:** Commenter believes a detailed socioeconomic analysis needs to be completed.

BLM Response: See BLM Response to Juniper Mountain Grazing Association Comment #16.

Owyhee Cattlemen's Association

1. **Comment:** Commenter expressed support for Alternative A.

BLM Response: No response required as no substantive comments were made.

Owyhee County Farm Bureau

1. **Comment:** Commenter expressed support for Alternative A.

BLM Response: No response required as no substantive comments were made.

Appendix F
Special status wildlife species, status, and occurrence potential within
the Nickel Creek FFR Allotment

Species	Status ¹ /Type ²	Occurrence Potential ³
Snake River Physa Snail <i>Physa natricina</i>	ESA-E	Species not present due to lack of habitat
Columbia Spotted Frog <i>Rana luteiventris</i>	ESA-C	Presence documented
Greater Sage-grouse <i>Centrocercus urophasianus</i>	ESA-C	Presence documented
Yellow-billed Cuckoo <i>Coccyzus americanus</i>	ESA-C	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Bald Eagle <i>Haliaeetus leucocephalus</i>	BGEPA	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Golden Eagle <i>Aquila chrysaetos</i>	BGEPA	Species may occur based on preferred habitat and/or nearby occurrences within 25 miles
Northern Leopard Frog <i>Rana pipiens</i>	BLM/2	Species may occur based on preferred habitat and/or occurrences within 25 miles
Pygmy Rabbit <i>Brachylagus idahoensis</i>	BLM/2	Species may occur based on preferred habitat and/or occurrences within 25 miles
Columbia River Redband Trout <i>Oncorhynchus mykiss gibbsi</i>	BLM/2	Presence documented
Black Tern <i>Chlidonias niger</i>	BLM/3	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Brewer's Sparrow <i>Spizella breweri</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
California Bighorn Sheep <i>Ovis canadensis californiana</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
California Floater <i>Anodonta californiensis</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Calliope Hummingbird <i>Stellula calliope</i>	BLM/3	Species may occur based on preferred habitat and/or occurrences within 25 miles
Common Garter Snake <i>Thamnophis sirtalis</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Ferruginous Hawk <i>Buteo regalis</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Flammulated Owl <i>Otus flammeolus</i>	BLM/3	Species may occur based on preferred habitat and/or occurrences within 25 miles
Fringed Myotis <i>Myotis thysanodes</i>	BLM/3	Species may occur based on preferred habitat and/or occurrences within 25 miles
Hammond's Flycatcher <i>Empidonax hammondii</i>	BLM/3	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Lewis' Woodpecker <i>Melanerpes lewis</i>	BLM/3	Species may occur based on preferred habitat and/or occurrences within 25 miles
Loggerhead Shrike <i>Lanius ludovicianus</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Longnose Snake <i>Rhinocheilus lecontei</i>	BLM/3	Species not present due to lack of habitat
Mojave Black-collared Lizard <i>Crotaphytus bicinctores</i>	BLM/3	Species not present due to lack of habitat
Mountain Quail	BLM/3	Species not likely to occur based on limited or lack of

Species	Status ¹ /Type ²	Occurrence Potential ³
<i>Oreortyx pictus</i>		preferred habitat and/or occurrence over 50 miles
Northern Goshawk <i>Accipiter gentilis</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Peregrine Falcon <i>Falco peregrinus anatum</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Piute Ground Squirrel <i>Spermophilus mollis artemisae</i>	BLM/3	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Prairie Falcon <i>Falco mexicanus</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Sage Sparrow <i>Amphispiza belli</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Sharp-tailed Grouse <i>Tympanuchus phasianellus columbianus</i>	BLM/3	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Spotted Bat <i>Euderma maculatum</i>	BLM/3	Presence documented
Townsend's Big-eared Bat <i>Corynorhinus townsendii</i>	BLM/3	Species may occur based on preferred habitat and/or occurrences within 25 miles
Western Ground Snake <i>Sonora semiannulata</i>	BLM/3	Species not present due to lack of habitat
Western Toad <i>Bufo boreas</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Willow Flycatcher <i>Empidonax trailii</i>	BLM/3	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Woodhouse's Toad <i>Bufo woodhousii</i>	BLM/3	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Black-throated Sparrow <i>Amphispiza bilineata</i>	BLM/4	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
California Myotis <i>Myotis californicus</i>	BLM/4	Species may occur based on preferred habitat and/or occurrences within 25 miles
Dark Kangaroo Mouse <i>Microdipodops megacephalus</i>	BLM/4	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
Kit Fox <i>Vulpes velox</i>	BLM/4	Species not present due to lack of habitat
Little Pocket Mouse <i>Perognathus longimembris</i>	BLM/4	Species not present due to lack of habitat
Meriam's Ground Squirrel <i>Spermophilus canus vigilis</i>	BLM/4	Species not likely to occur based on limited or lack of preferred habitat and/or occurrence over 50 miles
White-faced Ibis <i>Plegadis chihi</i>	BLM/4	Species likely to occur based on preferred habitat and/or occurrences within 5 miles
Wyoming Ground Squirrel <i>Spermophilus elegans nevadensis</i>	BLM/4	Species may occur based on preferred habitat and/or occurrences within 25 miles

¹Status includes Candidate (ESA C) species listed under the Endangered Species Act (16 U.S.C. § 1531-1544), eagles (BGEPA) protected by the Bald and Golden Eagle Protection Act (16 U.S.C. § 668-668d), and BLM Type 2 (BLM 2), Type 3, (BLM 3), and Type 4 (BLM 4) special status species (USDI BLM 2003). Additional designations under state and national conservation plans include Idaho Species of Greatest Conservation Need (SGCN; (IDFG 2006b)), Idaho Partners in Flight High Priority Breeding Bird (HPBB; (IPIF 2000)), and U.S. Fish and Wildlife Service Birds of Conservation Concern (BCC; (USDI USFWS 2008)).

²Type includes Rangelwide/Globally Imperiled Species (2), Regional/State Imperiled Species (3), and Peripheral Species (4)

³Presence of habitat within project area was determined from Idaho Vertebrate Modeling Database (University of Idaho n.d.); Oregon Wildlife Viewer (Oregon State University n.d.); (Yensen and Sherman 2003); Idaho, Oregon and Nevada BLM unpublished data; and specialist expertise. Habitat descriptions modified from Idaho Vertebrate Modeling Database (University of Idaho n.d.).

Appendix G
Migratory bird species with the potential to occur within
the Nickel Creek FFR Allotment

Common Name	Species Name	ID SGCN¹	HPBB²	BCC³	IWJV⁴	NABCI ID⁵
American Avocet	<i>Recurvirostra americana</i>	S3	Y		Y	Y
American Coot	<i>Fulica americana</i>					
American Crow	<i>Corvus brachyrhynchos</i>					
American Dipper	<i>Cinclus mexicanus</i>		Y			Y
American Goldfinch	<i>Carduelis tristis</i>					
American Kestrel	<i>Falco sparverius</i>					
American Pipit	<i>Anthus rubescens</i>					
American Robin	<i>Turdus migratorius</i>					
American Widgeon	<i>Anas americana</i>				Y	Y
Ash-throated Flycatcher	<i>Myiarchus cinerascens</i>					
Bank Swallow	<i>Riparia riparia</i>					
Barn Owl	<i>Tyto alba</i>					
Barn Swallow	<i>Hirundo rustica</i>					
Barrow's Goldeneye	<i>Bucephala islandica</i>	GAME	Y			Y
Belted Kingfisher	<i>Ceryle alcyon</i>					
Black Rosy-finch	<i>Leucosticte atrata</i>	S3	Y	Y		Y
Black-billed Magpie	<i>Pica pica</i>		Y			
Black-capped Chickadee	<i>Poecile atricapilla</i>					
Black-chinned Hummingbird	<i>Archilochus alexandri</i>		Y			
Black-crowned Night-Heron	<i>Nycticorax nycticorax</i>	S2B				Y
Black-headed Grosbeak	<i>Pheucticus melanocephalus</i>					
Black-necked Stilt	<i>Himantopus mexicanus</i>	S3	Y		Y	Y
Black-throated	<i>Dendroica</i>		Y	Y		

Common Name	Species Name	ID SGCN¹	HPBB²	BCC³	IWJV⁴	NABCI ID⁵
Gray Warbler	<i>nigrescens</i>					
Blue-winged Teal	<i>Anas discors</i>					Y
Bobolink	<i>Dolichonyx oryzivorus</i>					Y
Bohemian Waxwing	<i>Bombycilla garrulus</i>					
Bonaparte's Gull	<i>Larus phildelphia</i>					
Brewer's Blackbird	<i>Euphagus cyanocephalus</i>					
Broad-tailed Hummingbird	<i>Selasphorus platycercus</i>					
Brown Creeper	<i>Certhia americana</i>					
Brown-headed Cowbird	<i>Molothrus ater</i>					
Bufflehead	<i>Bucephala albeola</i>					Y
Bullock's Oriole	<i>Icterus bullocki</i>					
Bushtit	<i>Psaltriparus minimus</i>					
California Gull	<i>Larus californicus</i>	S2B				Y
California Quail	<i>Callipepla californica</i>	GAME				
Canada Goose	<i>Branta canadensis</i>					Y
Canvasback	<i>Aythya valisineria</i>	S2N			Y	Y
Canyon Wren	<i>Catherpes mexicanus</i>					
Caspian Tern	<i>Sterna caspia</i>	S2B				Y
Cassin's Finch	<i>Carpodacus cassinii</i>				Y	Y
Cassin's Vireo	<i>Vireo cassinii</i>					
Cattle Egret	<i>Bubulcus ibis</i>	S2B				Y
Cedar Waxwing	<i>Bombycilla cedrorum</i>					
Chipping Sparrow	<i>Spizella passerina</i>					
Chukar	<i>Alectoris chukar</i>	GAME				
Cinnamon Teal	<i>Anas cyanoptera</i>	GAME	Y		Y	Y
Clark's Grebe	<i>Aechmophorus</i>	S2B			Y	Y

Common Name	Species Name	ID SGCN ¹	HPBB ²	BCC ³	IWJV ⁴	NABCI ID ⁵
	<i>clarkii</i>					
Clark's Nutcracker	<i>Nucifraga columbiana</i>				Y	Y
Cliff Swallow	<i>Hirundo pyrrhonota</i>					
Common Goldeneye	<i>Bucephala clangula</i>					Y
Common Loon	<i>Gavia immer</i>	S1B			Y	y
Common Merganser	<i>Mergus merganser</i>					
Common Nighthawk	<i>Chordeiles minor</i>					
Common Poorwill	<i>Phalaenoptilus nuttallii</i>					
Common Raven	<i>Corvus corax</i>					
Common Yellowthroat	<i>Geothlypis trichas</i>					
Cooper's Hawk	<i>Accipiter cooperii</i>					
Cordilleran Flycatcher	<i>Empidonax occidentalis</i>					Y
Dark-eyed Junco	<i>Junco hyemalis</i>					
Double-crested Cormorant	<i>Phalacrocorax auritus</i>					
Downy Woodpecker	<i>Picoides pubescens</i>					
Dunlin	<i>Calidris alpina</i>					Y
Dusky Flycatcher	<i>Empidonax oberholseri</i>		Y		Y	Y
Eared Grebe	<i>Podiceps nigricollis</i>			Y	Y	Y
Eastern Kingbird	<i>Tyrannus tyrannus</i>					
Forster's Tern	<i>Sterna forsteri</i>	S1				Y
Franklin's Gull	<i>Larus pipixcan</i>	S2B	Y		Y	Y
Gadwall	<i>Anas strepera</i>				Y	Y
Grasshopper Sparrow	<i>Ammodramus savannarum</i>	S2B	Y			Y
Gray Flycatcher	<i>Empidonax wrightii</i>	N	Y		Y*	
Gray Jay	<i>Perisoreus canadensis</i>					

Common Name	Species Name	ID SGCN ¹	HPBB ²	BCC ³	IWJV ⁴	NABCI ID ⁵
Gray Partridge	<i>Perdix perdix</i>	GAME				
Great Blue Heron	<i>Ardea herodias</i>					
Great Egret	<i>Ardea alba</i>	S1B				
Great Horned Owl	<i>Bubo virginianus</i>					
Greater Yellowlegs	<i>Tringa melanoleuca</i>					Y
Green-tailed Towhee	<i>Pipilo chlorurus</i>			Y	Y	Y
Green-winged Teal	<i>Anas crecca</i>					Y
Hairy Woodpecker	<i>Picoides villosus</i>					
Hermit Thrush	<i>Catharus guttatus</i>					
Hooded Merganser	<i>Lophodytes cucullatus</i>	S2B	Y			
Horned Grebe	<i>Podiceps auritus</i>	S1				Y
Horned Lark	<i>Eremophila alpestris</i>					
House Finch	<i>Carpodacus mexicanus</i>					
House Wren	<i>Troglodytes aedon</i>					
Killdeer	<i>Charadrius vociferus</i>		Y			Y
Lark Sparrow	<i>Chondestes grammacus</i>		Y			
Lazuli Bunting	<i>Passerina amoena</i>					Y
Least Sandpiper	<i>Calidris minutilla</i>				Y	Y
Lesser Goldfinch	<i>Carduelis psaltria</i>	S2				Y
Lesser Scaup	<i>Aythya affinis</i>	S3			Y	Y
Lesser Yellowlegs	<i>Tringa flavipes</i>					Y
Lincoln's Sparrow	<i>Melospiza lincolnii</i>					
Long-billed Curlew	<i>Numenius americanus</i>	S2B	Y	Y	Y	Y
Long-billed Dowitcher	<i>Limnodromus scolopaceus</i>				Y	Y
Long-eared Owl	<i>Asio otus</i>					
MacGillivray's Warbler	<i>Oporornis tolmiei</i>		Y			Y
Mallard	<i>Anas</i>				Y	Y

Common Name	Species Name	ID SGCN¹	HPBB²	BCC³	IWJV⁴	NABCI ID⁵
	<i>platyrhynchos</i>					
Marbled Godwit	<i>Limosa fedoa</i>	S2		Y		Y
Marsh Wren	<i>Cistothorus palustris</i>					
Merlin	<i>Falco comlumbarius</i>	S2B				
Mountain Bluebird	<i>Sialia currucoides</i>				Y	Y
Mourning Dove	<i>Zenaida macroura</i>					
Nashville Warbler	<i>Vermivora ruficapilla</i>					
Northern Flicker	<i>Colaptes auratus</i>					
Northern Harrier	<i>Circus cyaneus</i>					
Northern Pintail	<i>Anas acuta</i>	S2N			Y	Y
Northern Pygmy-owl	<i>Glaucidium gnoma</i>					Y
Northern Rough-winged Swallow	<i>Stelgidopteryx serripennis</i>					
Northern Saw-whet Owl	<i>Aegolius acadicus</i>					
Northern Shoveler	<i>Anas clypeata</i>	S2N			Y	Y
Northern Shrike	<i>Lanius excubitor</i>					
Orange-crowned Warbler	<i>Vermivora celata</i>					
Osprey	<i>Pandion haliaetus</i>					Y
Pied-billed Grebe	<i>Podilymbus podiceps</i>					
Pine Siskin	<i>Carduelis pinus</i>					
Red-breasted Nuthatch	<i>Sitta canadensis</i>					Y
Red-eyed Vireo	<i>Vireo olivaceus</i>					
Redhead	<i>Aythya americana</i>	GAME	Y		Y	Y
Red-naped Sapsucker	<i>Sphyrapicus nuchalis</i>				Y	
Red-necked Phalarope	<i>Phalaropus lobatus</i>				Y	Y
Red-tailed Hawk	<i>Buteo jamaicensis</i>					
Red-winged	<i>Aeglais</i>					

Common Name	Species Name	ID SGCN¹	HPBB²	BCC³	IWJV⁴	NABCI ID⁵
Blackbird	<i>phoeniceus</i>					
Ring-billed Gull	<i>Larus delawarensis</i>					
Ring-necked Duck	<i>Aythya collaris</i>					Y
Rock Wren	<i>Salpinctes obsoletus</i>		Y			
Rough-legged Hawk	<i>Buteo lagopus</i>					
Ruby-crowned Kinglet	<i>Regulus calendula</i>					
Ruddy Duck	<i>Oxyura jamaicensis</i>	S2N			Y	Y
Rufous Hummingbird	<i>Selasphorus rufus</i>		Y		Y	Y
Sage Thrasher	<i>Oreoscoptes montanus</i>		Y	Y	Y	Y
Sandhill Crane	<i>Grus canadensis</i>	GAME	Y		Y	Y
Savannah Sparrow	<i>Passerculus sandwichensis</i>					
Say's Phoebe	<i>Sayornis saya</i>					
Sharp-shinned Hawk	<i>Accipiter striatus</i>		Y			
Short-eared Owl	<i>Asio flammeus</i>	S4	Y			Y
Snow Bunting	<i>Plectrophenax nivalis</i>					
Snow Goose	<i>Chen caerulescens</i>					Y
Snowy Egret	<i>Egretta thula</i>	S2B			Y	Y
Song Sparrow	<i>Melospiza melodia</i>					
Sora	<i>Porzana carolina</i>					
Spotted Sandpiper	<i>Actitis macularia</i>				Y	Y
Spotted Towhee	<i>Pipilo maculatus</i>					
Stellar's Jay	<i>Cyanocitta stelleri</i>					
Swainson's Hawk	<i>Buteo swainsoni</i>	S3B	Y		Y	Y
Townsend's Solitaire	<i>Myadestes townsendi</i>					Y
Townsend's Warbler	<i>Dendroica townsendi</i>		Y			Y
Tree Swallow	<i>Tachycineta bicolor</i>					

Common Name	Species Name	ID SGCN ¹	HPBB ²	BCC ³	IWJV ⁴	NABCI ID ⁵
Tundra Swan	<i>Cygnus columbianus</i>					Y
Turkey Vulture	<i>Cathartes aura</i>					
Vaux's Swift	<i>Chaetura vauxi</i>					Y
Veery	<i>Catharus fuscescens</i>					
Vesper Sparrow	<i>Pooecetes gramineus</i>					
Violet-green Swallow	<i>Tachycineta thalassina</i>					
Virginia Rail	<i>Rallus limicola</i>					
Warbling Vireo	<i>Vireo gilvus</i>					
Western Burrowing Owl	<i>Athene cunicularia</i>	S2				Y
Western Grebe	<i>Aechmophorus occidentalis</i>	S2B	Y		Y	Y
Western Kingbird	<i>Tyrannus verticalis</i>					
Western Meadowlark	<i>Sturnella neglecta</i>					
Western Sandpiper	<i>Calidris mauri</i>				Y	Y
Western Screech-Owl	<i>Otus kennicotti</i>					
Western Tanager	<i>Piranga ludoviciana</i>		Y			Y
Western Wood-Pewee	<i>Contopus sordidulus</i>					
White-crowned Sparrow	<i>Zonotrichia leucophrys</i>					
White-headed Woodpecker	<i>Picoides albolarvatus</i>	S2	Y	Y	Y	Y
White-throated Swift	<i>Aeronautes saxatalis</i>				Y	
Willet	<i>Catoptrophorus semipalmatus</i>				Y	Y
Wilson's Phalarope	<i>Phalaropus tricolor</i>	S3B			Y	Y
Wilson's Snipe	<i>Gallinago delicata</i>					Y
Wilson's Warbler	<i>Wilsonia pusilla</i>					
Wood Duck	<i>Aix sponsa</i>					Y
Yellow Warbler	<i>Dendroica</i>		Y			

Common Name	Species Name	ID SGCN ¹	HPBB ²	BCC ³	IWJV ⁴	NABCI ID ⁵
	<i>petechia</i>					
Yellow-breasted Chat	<i>Icteria virens</i>					
Yellow-headed Blackbird	<i>Xanthocephalus xanthocephalus</i>				Y*	
Yellow-rumped Warbler	<i>Dendroica coronata</i>					

¹ID SGCN includes Idaho Species of Greatest Conservation Need with the following designations: S-State Rank, 1-critically imperiled, 2-imperiled, 3-rare, B-breeding population, N-nonbreeding population, and GAME - game bird (IDFG 2006b).

²HPBB includes Idaho Partners in Flight High Priority Breeding Bird species (IPIF 2000).

³BCC includes U.S. Fish and Wildlife Service Birds of Conservation Concern (USDI USFWS 2008).

⁴IMJV includes Intermountain West Joint Venture Continentally Important Species. Asterisk denotes that the species is not CIS in Intermountain West Avifaunal Biome.

⁵NABCI includes Continental and Regional Priority Bird Species of Idaho listed by North American Bird Conservation Initiative partners (North American Waterfowl Plan, U.S. Shorebird Conservation Plan, Partners in Flight, Waterbird Conservation for the Americas) under state and national conservation plans.

Appendix H

Alterative B monitoring requirements

Monitoring areas would be identified by the BLM and JMGA annually. Due to the scattered nature of BLM land, not every field would be monitored every year. Instead, monitoring sites would be selected based on key areas or representative areas within the allotment or pasture. These areas would be located where cattle graze and/or where use is representative within the pasture or fields and/or where issues have been identified through previous monitoring. The monitoring would include both upland and riparian areas.

Due to the number of fields, monitoring sites would be rotated throughout the allotment as needed to ensure compliance with the terms and conditions. Up to 6 monitoring sites would be completed in the allotment within no less than 1 monitoring site per pasture or field. The JMGA would collect the monitoring information as outlined in Utilization Studies and Residual Measurements (Interagency Technical Reference 1734-3, 1996) and submit their information each year to the BLM. If any pasture or field exceeded the average upland or riparian standards, then the JMGA would be required to rest the pasture(s) or field(s) that exceeded the standards the following year (where the monitoring occurred). Failure by JMGA to submit the required monitoring information would result in no livestock grazing in the allotment for the following year. Monitoring information would be collected after October and after livestock have been removed.

As needed, the BLM may also collect the same monitoring Terms and Conditions independent of the permittee to ensure compliance with these requirements.