



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT  
Four Rivers Field Office  
3948 Development Avenue  
Boise, Idaho 83705



**DECISION RECORD**  
**Environmental Assessment**  
***DOI-BLM-ID-B010-2011-0060-EA***  
***Paradigm Fuel Break Project***

**Decision:**

Having considered a full range of alternatives and their associated impacts, it is my final decision to implement the actions as described in Alternative 2 of the Environmental Assessment DOI-BLM-ID-B010-2011-0060-EA (EA). Over the next six to ten years, the BLM will establish a 356-mile network of fuel breaks in the Paradigm Project area. Seeding prostrate kochia will be the primary method for creating fuel breaks on approximately 274 miles (9,854 acres). Other methods described in detail in Sections 2.3.1 (Methods) and 2.3.2 (Features Common to All Action Alternatives) of the EA will be used to develop non-kochia fuel breaks on 82 miles (3,024 acres) within designated slickspot peppergrass or other buffer or avoidance zones (e.g., Oregon National Historic Trail). If prostrate kochia is not a suitable tool in a particular area, one or a combination of the following treatments may be used to create fuel breaks (to be determined based on resource or other constraints):

- Seeding short statured perennial plants other than prostrate kochia
- Disking/bare ground
- Mechanical thinning and mowing
- Targeted grazing (on a limited and site specific basis for development and maintenance of fuel breaks as per stipulations in Attachment A)

Seed bed preparation, if necessary, will occur prior to seeding kochia or other plants using one or more of the methods described in the EA (e.g., disking, herbicide application). Refer to Attachment A for a summary and EA Section 2.3 for a detailed discussion of the proposed alternative and associated project treatment methods, design features, stipulations, and standard operating procedures (SOPs).

***Finding of No Significant Impact***

A Finding of No Significant Impact (FONSI) document was signed on April 24, 2015. The FONSI concludes that the Paradigm Fuel Break Project does not constitute a major federal action, and will not significantly impact the quality of the human environment individually or cumulatively with other actions in the analysis area. Therefore, an environmental impact statement is not required. A copy of the FONSI for EA# DOI-BLM-ID-B010-2011-0060-EA is available on BLM's NEPA Register.

**Authorities:**

The authority for this decision is contained in Title 43 of the Code of Federal Regulations (CFR) § 503.1(b).

**Compliance and Monitoring:**

Implementation monitoring will occur during and following all phases and will be conducted by the project inspector to ensure that the project was implemented as prescribed. Treatment effectiveness monitoring will be conducted annually for first five years, then every three to five years thereafter to evaluate success of treatments and the need for additional or follow-up treatments. Refer to EA Section 2.3.2.3 Monitoring and Control, and Appendix 6.2 Monitoring Methodology, for details including protocols, timelines, and evaluation criteria.

**Terms / Conditions / Stipulations:**

Consultation to address impacts to slickspot peppergrass (proposed for federal listing) with the US Fish and Wildlife Service per Section 7 of the Endangered Species Act was completed and a Conference Opinion was received on April 20, 2015. Based on consultation, numerous design features (EA Section 2.3.2.2) were developed to minimize or eliminate adverse impacts of the proposed action to soils, vegetation, air quality, slickspot peppergrass, cultural resources, sensitive wildlife habitat, and Class I visual resource areas, and by noxious and invasive weeds (see Attachment A below).

**Plan Conformance and Consistency:**

The proposed action and alternatives are in conformance with the 1983 Kuna Management Framework Plan (MFP), the 1987 Jarbidge Resource Management Plan (RMP), and the 2008 Birds of Prey National Conservation Area (NCA) RMP. Objectives in the NCA RMP relative to the purpose and need include protection of existing stands of native shrub habitat, reducing the size and recurrence of wildfires in the NCA, and increasing shrub habitat through restoration. Management actions associated with these RMP objectives include the creation and maintenance of fuel breaks in areas where frequent fires threaten habitats. The Jarbidge RMP discusses the use of fuel breaks and, while the Kuna MFP does not have objectives specific to fuel breaks, the project is in conformance with objectives for habitat protection and fire suppression outlined in these plans.

The Paradigm Fuel Break Project also complies with the following pertinent statutes, regulations and other requirements:

- Secretarial Order 3336 (2015); Rangeland Fire Prevention, Management and Restoration;
- Conservation Plan for the Greater Sage-grouse in Idaho (2006) and the 2010 BLM National Strategy. In the Idaho plan, fuel breaks in the form of green strips was identified as infrastructure conservation measures on pages 4-43, item 3 and page 4-53, item 2;
- Instruction Memorandum (IM) 2013-128; Sage-Grouse Conservation in Fire Operations and Fuels Management;
- IM 2012-043; Greater Sage-Grouse Interim Management Policies and Procedures;

- U.S. Fish and Wildlife Service (USFWS), Conference Opinion, Bureau of Land Management (BLM) Existing Land Use Plans in the Boise and Twin Falls District Related to Slickspot Peppergrass Conservation-Ada, Adams, Boise, Canyon, Elmore, Gem, Owyhee, Payette, Twin Falls, Valley, and Washington, Counties, Idaho, November 2009;
- Conservation Agreement-BLM and USFWS-Idaho BLM Existing Land Use Plans and On-going Actions Affecting Slickspot Peppergrass-2014;
- Oregon Trail Management Plan – This plan outlines the BLM Boise Districts responsibilities in managing, protecting, and interpreting the Oregon National Historic Trail. The plan was signed by the Boise District Manager in 1984;
- Cultural Resource Laws and Executive Orders - State Protocol Agreement between the Idaho State Director, Bureau of Land Management (BLM), and the Idaho State Historic Preservation Office (SHPO) regarding the manner in which the BLM will meet its responsibilities under the National Historic Preservation Act (NHPA) as provided for in the National Programmatic Agreement (NPA). This protocol implements the BLMs National Programmatic Agreement in Idaho by describing how Idaho SHPO and the BLM will interact and cooperate under the NPA in regards to the BLM Section 106 responsibilities under the NHPA; and
- Executive Order 13186 expressly requires that Federal agencies evaluate the effects of proposed actions on migratory birds (including eagles) pursuant to NEPA “or other established environmental review process;” restore and enhance the habitat of migratory birds, as practicable; identify where unintentional take reasonably attributable to agency actions is having, or is likely to have, a measurable negative effect on migratory bird populations; and, with respect to those actions so identified, the agency shall develop and use principles, standards, and practices that will lessen the amount of unintentional take, developing any such conservation efforts in cooperation with the Service.

**Alternatives Considered:**

Below is a summary of the alternatives analyzed in the EA. Refer to EA Section 2.3 for a detailed discussion of alternatives and associated project treatment methods, design features, stipulations, and standard operating procedures.

Comparison of fuel break miles and maximum acres of fuels breaks by alternative:

Alternative	Total Miles	Maximum Acres
1 – No Action	0	0
2 – Proposed Action	356	12,878
3 – North Boundary Adjustment	305	11,030
4 – High Human Ignition Focus	92	3,400

**Alternative 1 (No Action)**

A strategic network of fuel breaks would not be implemented. Maintenance of existing fuel breaks within the project area would also not occur (i.e., no re-seeding, herbicide, or other treatments) to augment effectiveness of existing fuel breaks.

***Alternative 2 (Proposed Action)***

See description under Decision above.

***Alternative 3 (Northern Boundary Adjustment)***

The northern boundary would be adjusted from Alternative 2 (Map 5 of the EA) to the electric transmission line #906 south of Mayfield road (Map 6 of the EA) to minimize potential impacts to the Oregon National Historic Trail; the Mayfield Road is designated by the State of Idaho as a backcountry byway and is recognized as the route of the Oregon Trail. A total of 305 miles of fuel breaks would be developed over a maximum of 11,030 acres. Approximately 223 miles of kochia fuel breaks would be developed (8,006 acres); 20 miles (707 acres) would be established within the 1.5 mile buffer around EOs of slickspot peppergrass. Approximately 82 miles (3,024 acres) of non-kochia fuel breaks would be developed within slickspot peppergrass buffer zones.

***Alternative 4 (High Human Ignition Areas Only)***

Approximately 92 miles of fuel breaks would be established along Interstate 84, Highway 20, and the Union Pacific rail line south of Mountain Home covering approximately 3,400 acres on federal and state lands (Map 7 of the EA). Nearly 80% of the human caused fires start along these travel routes. Implementation of this alternative would create 71 miles (2,568 acres) of fuel breaks; 6 miles (222 acres) would be established within the 1.5 mile buffer around slickspot peppergrass EOs. Approximately 21 miles (832 acres) of non-kochia fuel breaks would be developed within the slickspot peppergrass buffer zones.

**Public Comments:**

The BLM provided an initial public scoping package outlining the project proposal on October 17, 2011 commencing a 30-day public scoping period (terminating November 14, 2011). Public input and scoping comments were used to help identify potential issues from the proposal, as well as inform alternative development for the EA. The draft EA was made available for a 30-day public comment period which ended on February 24, 2014. The BLM held public meetings at the Boise District Office in Boise, Idaho on January 28, 2014 and at the Elk's Lodge in Mountain Home, Idaho on February 4, 2014 to provide information, answer questions, and receive comments. Numerous comment submissions were received during the comment period, which were coded and summarized and stored in the Administrative Record. After review and consideration of the comments, modifications to the EA were made to address substantive points and/or clarify information and analyses.

**Rationale for Decision:**

My decision to approve Alternative 2, implementation of 356 miles (12,878 acres maximum) of fuel breaks, is based on the need to curtail fires that ignite along travel routes and lightning caused fires within and adjacent to the project area, which threaten human life and property and sensitive species habitat. Since 1980, more than 170,000 acres have burned within the 293,891-acre project area; nearly 80% of those fire starts were human caused and 20% were caused by lightning.

Several ranches and small communities in the area are at risk from wildfire including houses, outbuildings, and businesses on the periphery of Mountain Home. These fires have also been a major factor in the conversion from big sagebrush-native perennial plant dominated communities

to invasive annual plant dominated communities. Plant community degradation has, in turn, compromised slickspot peppergrass (proposed for federal protection) and greater sage-grouse (candidate for federal protection) habitats, and created an abundance of fine fuels accelerating the fire cycle in the project area. Implementation of Alternative 2 will provide for firefighter and public safety and protect sensitive species and their habitats by the following means:

- Reducing the amount of fires that ignite and burn near roadways;
- Providing additional and improved strategic locations for fire suppression tactics;
- Minimizing the size of fires in the project area by compartmentalizing the project area into more defensible units;
- Reducing the number of roadside fires that burn into the adjacent rangelands;
- Protecting remaining intact big sagebrush communities (which include slickspot peppergrass and greater-sage grouse habitat); and
- Protecting future habitat rehabilitation and restoration treatments.

**Protest/Appeal Language:**

Any applicant, permittee, lessee, or interested party may appeal a final decision under Section 43 CFR 4.410, 4.411, 4.412, and 4.413 in person or in writing to Tate Fischer, Four Rivers Field Office Manager, at 3948 Development Avenue, Boise, ID 83705 within 30 days after receipt of such decision. A notice of appeal must include a statement of reasons for the appeal, a statement of standing if required by 43 CFR 4.412(b), and any arguments the appellant wishes to make. The person/party must also serve a copy of the appeal on the Office of the Solicitor, Boise Field Solicitors Office, University Plaza, 960 Broadway Ave., Suite 400, Boise Idaho, 83706 and to person(s) named [43 CFR 4.421(h)] in the CC: section of this decision, if any. The Interior Board of Land Appeals must decide an appeal of this decision within 60 days after all pleadings have been filed, and within 180 days after the appeal was filed as contained in 43 CFR 4.416.

/s/ *Tate Fischer*  
Tate Fischer  
Four Rivers Field Office Manager

04/24/2015  
Date

## **Attachment A (Terms/Conditions/Stipulations):**

### **Soils**

- Mowing, drill seeding, or targeted grazing would not occur when soils are saturated and easily rutted or compressed.
- A minimum till drill or rangeland drill with depth bands would be used to seed fuel breaks in soils with wind erodibility index values (WEI) of 134 or greater (i.e. sandy sites) to minimize soil disturbance.
- Herbicides to control annual grasses and forbs would not be used on soils with WEI values of 134 or greater unless adequate vegetative cover is present to reduce the potential of erosion (e.g., release of perennial plants).

### **Vegetation including Noxious and Invasive Weeds**

- Disturbed areas would be monitored for noxious weeds, and appropriate treatments would be applied in conformance with the standard operating procedures identified in the Boise District Noxious Weed EA (EA#ID100-2005-EA-265) and the ROD for the Vegetation Treatments Using Herbicides on Bureau of Land Management Lands in 17 Western States PEIS (USDI BLM 2007b).
- Herbicide application would utilize truck, tractor, or ATV/UTV mounted sprayer. Spot treatments may be completed using a backpack sprayer.
- Herbicide may be applied before or after mowing or seeding, depending on the target species and type of herbicide.
- Existing noxious weed populations would be treated prior to fuel break development or avoided to reduce the chance of spread.
- Mowing and seeding equipment, including vehicles and trailers, would be washed prior to use in the project area to reduce the potential for weed spread.
- Seeded fuel breaks would not be created in wetland or riparian zones (i.e. where riparian vegetation/hydric plants exist).
- Mowed fuel breaks would be maintained (re-mowed) when sagebrush has re-grown to an average height of 15 inches.
- Debris piles created during thinning operations would be limited to 15 feet in diameter and 10 feet in height, and would be ignited when prescription burn conditions are appropriate (i.e. soils are either wet or frozen).

### **Air Quality**

- To ensure Clean Air Act compliance, burning would be conducted in accordance with the Montana/Idaho State Airshed Group Operating Guide (August 2003).
- Site preparation for seeding using prescribed fire would be conducted by BLM personnel when weather and wind conditions are appropriate.

### **Slickspot peppergrass**

- *Layout - for all Methods*
  - Within slickspot peppergrass Element Occurrences (EOs) and occupied habitat, including proposed critical habitat, fuel break design and layout would be coordinated with US Fish and Wildlife Service.

- Within EOs and proposed critical habitat, slickspots would be flagged for avoidance by machinery and personnel.
- Fuel break implementation within EOs or in occupied habitat would be overseen by a BLM botanist or qualified botany technician to ensure avoidance is maximized and impacts are minimized.
- *Surveys* - Upon completion of Stage 1 surveys in June of 2013 all potential habitat within the project treatment footprint was classified as slickspot peppergrass habitat on federal and state land. Additional Stage 1 surveys on 37 miles of new routes were completed in October of 2014; Stage 2 surveys of all previously recorded slickspots from Stage 1 surveys were completed in July of 2014. Two new EOs were documented within the treatment boundary; one was located during Stage 2 surveys and the other during other field office monitoring; as a result the slickspot peppergrass habitat within a 0.5 mile buffer surrounding these new EOs was reclassified to occupied habitat.
- *Disking*
  - Would not occur within slickspot peppergrass EOs or proposed critical habitat.
  - Would only occur in occupied habitat (excluding proposed critical habitat) through annual site-specific coordination with FWS.
  - Would only occur in occupied habitat (excluding proposed critical habitat) in areas that are devoid of slickspots.
  - Would only occur in slickspot peppergrass habitat after three years of surveys confirm that the area is unoccupied slickspot peppergrass habitat.
- *Mechanical Thinning and Mowing*
  - Occupied habitat, including proposed critical habitat, would be thinned or mowed on a site-specific basis with direction from BLM and FWS botanists.
  - Mowing in slickspot peppergrass habitat would not occur when slickspot soils are saturated.
- *Herbicides*
  - Ground-based herbicide application within slickspot peppergrass management area boundaries, but outside of slickspots, would be limited to wind conditions less than 7 miles per hour, use large droplet spray with reduced pump pressure, and use spot spraying techniques to prevent drift of herbicide into slickspots (USDI BLM 2006).
  - Within slickspot peppergrass EOs, herbicide would only be applied using hand sprayers. A 10-foot no-herbicide treatment buffer would be established around slickspots located in element occurrences. Within the buffer zone, weeds would be treated by hand (USDI BLM 2006).
  - Off-site movement of herbicides either through the air, soil, or over the soil surface would be avoided. Terrain, soil type, and vegetation would be taken into consideration when selecting herbicide type, application method, and application timing. Weed treatments using persistent herbicides would not occur within 150 feet of EOs (USDI BLM 2006).
- *Targeted Livestock Grazing*

- Would not occur within slickspot peppergrass EOs or proposed critical habitat.
- Within occupied habitat but outside of an EO, and within all slickspot peppergrass habitat, targeted grazing would not occur when soils are saturated (USDI FWS & BLM 2013); there would be no evidence of puddles (i.e. standing water) and the soil within slickspots would be firm (i.e. a boot heel would not penetrate more than 0.5 inches).
- Livestock would not be allowed to gather, trail, or bed within slickspots of occupied habitat, including proposed critical habitat, or slickspot peppergrass habitat.
- *Prescribed Fire*
  - Would not take place within extant EOs.
  - Would only occur in occupied habitat, inclusive of proposed critical habitat, through site-specific annual coordination with FWS.
  - Slickspots in occupied habitat, including proposed critical habitat, but outside of a given EO would be flagged for avoidance by operational equipment, to protect against potential compaction and soil displacement.
  - Would take place during periods when soils are frozen or wet to decrease potential damage to slickspot soils.
- *Seeding*
  - Native species would be a priority for use in seed mixes in occupied habitat, including proposed critical habitat (USDI FWS & BLM 2013).
  - Seeding in occupied habitat, including proposed critical habitat, and slickspot peppergrass habitat would occur via minimum or moderate soil disturbance seeding techniques as described in Methods (Tools), Section 2.3.2.1.
  - Prostrate kochia would not be utilized for seeded fuel break treatments within 1.5 mile of extant slickspot peppergrass EOs (USDI BLM 2012, USDI FWS 2012, USDI FWS & BLM 2014), except for the limited areas identified in Section 3.3.1 (Special Status Species, Affected Environment) .
  - Seedings would be monitored for establishment success; if areas are determined to be unnecessary or not capable of becoming successful seedings, those areas would be seeded with a mix of native grasses, forbs, and shrubs.

### **Cultural Resources**

- No disking would occur in any archeological site.
- Herbicides may be applied on National Register listed or eligible sites either through the use of hand sprayers or UTV/ATV mounted sprayers. UTV/ATV use across a site would only be done when the soils are not wet or saturated.
- Seeding in National Register listed or eligible sites would be accomplished through hand seeders, or UTV/ATV mounted seeders. Seeding may be done within a site on a site by site basis with a minimum till drill or a standard rangeland drill, pulled by rubber-tired tractor, with depth bands when the soils are not wet or saturated. The use of a track-driven bulldozer to pull a rangeland drill will not be allowed in any archeological site. The use of a cultipacker or hydromulcher in any site would be determined in consultation with SHPO.

- Certain National Register listed or eligible sites may be burned over, dependent upon the nature of the artifacts or features present in each specific site. Which sites can be burned over would be looked at individually.
- Avoidance of National Register listed or eligible sites would be accomplished by flagging the site, or through construction of a temporary fence. Temporary fencing to exclude an archeological site area from targeted grazing would be placed in consultation with a BLM archeologist or the NRCS Cultural Resource Specialist on private and state lands.
- Any fuel break treatments occurring within an archeological site would be pre-approved in consultation with the Idaho SHPO.
- Standards Specific to the Oregon National Historic Trail
  - Drill seeding would not occur within 100 feet of trail remnants. The use of a culti-packer or hydro-mulching to place seed within the 100 feet would be determined on a segment by segment basis in consultation with SHPO.
  - Disking would not be allowed within one-quarter mile of either side of the Oregon National Historic Trail.
  - Trail remnants would not be disturbed during seeding or mowing. Mowing and or seeding would be parallel to trail ruts and would not occur within the trail corridor, which includes the swale or depression where the wagon wheels created ruts, and soil or rock berms on either side of the swale. An archaeologist would monitor all implementation activities along the trail.
  - Thinning of vegetation along the trail corridor would be by hand, leaving pockets of vegetation in a mosaic pattern.
  - Prescribed burning or other vegetative manipulation practices within a 0.5 mile protective corridor along visible remnants of the trail would be planned and conducted in such a way as the finished product resembles natural vegetative patterns.
  - The use of non-native vegetation may be acceptable in areas that have previously burned and where it would have a beneficial effect by protecting the trail. The use of native vegetation is preferred where the visual integrity of the trail is more intact.
  - Treatment actions along the OR Trail would be determined on a segment by segment basis in consultation with the Idaho SHPO.
  - Given the nature of the Oregon Trail, many vague braided routes and alignments, additional pedestrian surveys are required to fully identify all segments of the trail and their relationship to the proposed project. Fuel break locations and treatment methods scheduled for implementation in proximity to the OR Trail would be defined one year in advance of actual implementation in order for the BLM Archeologist to define the exact location of the trail, identify appropriate treatments along the trail, and complete the Section 106 compliance in consultation with the ID SHPO.

### **Wildlife Habitat**

- Treatments would not occur within 3 miles of an occupied and active lek from March 1 through July 31 to reduce the likelihood of impacts to sage-grouse reproduction including lek attendance, nesting, and early brood rearing.
- Mow strips in PPH or within one mile of an active and occupied sage-grouse lek would not be wider than 50 feet. Beyond the 50 feet of mowing in PPH, sagebrush may be thinned by hand to approximately 5 - 10% canopy cover for up to 50 additional feet.

Mow strips in PGH would not be wider than 100 feet and sagebrush may be thinned by hand beyond the 100 feet of mowing to approximately 5 - 10% canopy cover for another 100 feet.

- Permanent bare soil (disked) fuel breaks would not be established in PPH or PGH.
- Temporary fence would be constructed a minimum of 1.25 miles from occupied and active leks and marked in accordance with current marking specifications identified in IM No. ID-100-2011-001 and guidelines specified in BLM IM 2012-043 to reduce collisions by sage-grouse and impacts to other wildlife species.
- Disking would not occur from March 1<sup>st</sup> through July 31<sup>st</sup> to protect migratory birds and reduce the potential for impacts to Piute ground squirrel.
- NRCS-funded projects on lands within sage-grouse habitat would incorporate the Conservation Measures for the Firebreak Conservation Practice identified in the Conference Report for the Natural Resources Conservation Service Sage-grouse Initiative (SGI, see Appendix *Error! Reference source not found.*).
- Mowing of sagebrush and disking would not occur from March 1 through July 31 to protect nesting migratory landbirds.
- Surveys for pygmy rabbits would be repeated in potential habitat one week prior to mowing sagebrush. If occupied burrows are detected, mowing would not occur within 50 feet.
- No broadcast spraying of 2,4-D within 100 yards of active pygmy rabbit burrows. Only spot application would be used within 100 yards of active burrows.
- If pygmy rabbits are present, no application of herbicides within 100 yards of active burrows would occur from one hour before sunset to one hour after sunrise, to minimize the potential for direct contamination.
- Herbicides with the lowest likelihood of impacting wildlife would be used whenever possible. Herbicides that can cause harmful effects to wildlife would not be applied at the maximum rate.
- Surveys for raptor nesting activity would be completed two miles out from any site with proposed equipment operation (tractors, chainsaws) between January 1 and March 1. Nest sites identified as active during that period would be protected by establishing a buffer of not less than 0.5 miles. Established buffers would remain in effect from determination of an active nest through July 31, unless the nest is abandoned, destroyed (wind, lightning, wildfire), or the young fledge before July 31.
- Soil disturbance would not occur within the greenline of streams and wetlands to protect riparian habitat and to protect streams and habitat occupied by redband trout.

### **Visual Resource Management – Class I areas**

- In proposed fuel breaks areas with intact sagebrush stands, hand thinning would be the primary method to reduce fuels. Thinning objectives would be to create a natural appearing, open sagebrush canopy near the roads edge which gets thicker as one moves away from the road. Target canopy cover would be 2 to 5 percent within 25 feet of a road edge. Beyond 25 feet, thinning would taper from 5 to 25 percent canopy at 100 feet from road edge.

## **CC: Four Rivers Mailing List**

Ada County Commissioners, 200 W Front Street 3rd Floor, Boise, ID 83702-5960  
Army National Guard, 4040 W Guard Street, Boise, ID 83705-5004  
Burns Paiute Tribe, Tribal Chairman, 100 Pasigo Street, Burns, OR 97720-2442  
Boise National Forest, 2180 American Legion Boulevard, Mountain Home, ID 83647-3140  
Elmore County Commissioners, 150 S 4<sup>th</sup> East Suite 302, Mountain Home, ID 83647-3097  
Golden Eagle Audubon Society, PO Box 8261, Boise, ID 83707-8261  
Grazing Board Resource Area Rep, Phil Soulen, 1760 Fairmont Dr., Weiser, ID 83672-1215  
Grazing Board Resource Area Rep, Weldon Branch, 3621 N Crane Rd, Midvale, ID 83645-5521  
Honorable Congressman Raul Labrador, 33 E Broadway Ave. Suite 251, Meridian, ID 83642-2619  
Honorable Senator Jim Risch, 350 North 9th Street, Suite 302, Boise, ID 83702-5470  
Honorable Senator Mike Crapo, 251 East Front Street, Suite 205, Boise, ID 83702-7312  
Idaho Cattlemen's Association, PO Box 15397, Boise, ID 83715-5397  
Idaho Conservation League, 710 N 6th Street, Boise, ID 83702-5587  
Idaho Department of Agriculture, PO Box 790, Boise, ID 83701-0790  
IDF&G, C/O Rick Ward, 3101 S. Powerline Road, Nampa, ID 83686-8520  
Idaho Department of Lands, Grazing Program Manager, PO Box 83720, Boise, ID 83720-0050  
Idaho Native Plant Society, PO Box 9451, Boise, ID 83707-9451  
Idaho State Historic Preservation Office, 210 Main Street, Boise, ID 83702-0167  
Idaho Wild Sheep Foundation, PO Box 8224, Boise ID 83707-8224  
Idaho Wildlife Federation, Attn: Kent Laverty, PO Box 6426, Boise, ID 83707-6426  
Idaho Wool Growers Association, PO Box 2596, Boise, ID 83701-2596  
Land Trust of the Treasure Valley, PO Box 106, Boise, ID 83701-0106  
Nez Perce Tribes, Tribal Chairman, PO Box 305, Lapwai, ID 83540-0305  
Permittees affected in the Bennett Mountain, Mountain Home and Sunnyside Watersheds  
Shoshone-Bannock Tribe, Tribal Chairman, PO Box 306, Fort Hall, ID 83203-0306  
Shoshone-Paiute Tribe, Tribal Chairman, PO Box 219, Owyhee, NV 89832-0219  
Sierra Club, Middle Snake Group, PO Box 552, Boise, ID 83701-0552  
The Nature Conservancy, 950 W Bannock Suite 210, Boise, ID 83702-6093  
The Wilderness Society, 950 W Bannock Suite 605, Boise, ID 83702-6106  
US Fish and Wildlife Service, 1387 South Vinnell Way, Boise, ID 83709-1657  
Western Watersheds Project, PO Box 1770, Hailey, ID 83333-1770  
Wildlands Defense, PO Box 665, Boise, ID 83701-0665