United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Owyhee Field Office
20 First Ave West
Marsing, ID 83639
(208) 896-5912

In Reply Refer To:
4160 ID130

November 12, 2013

REGISTERED MAIL - FEDEX

John Isernhagen
2618 Cow Creek Rd.
Jordan Valley, OR 97910

Notice of Field Manager's Proposed Decision

Dear Mr. Isernhagen:

Thank you for your application for permit renewals on the Ferris FFR and Joint grazing allotments. Thank you as well for working with the BLM during the permit renewal process. I appreciate your interest in grazing the allotments in a sustainable fashion and am confident that this proposed decision achieves that objective.

As you know, the BLM evaluated current grazing practices and current conditions in the Ferris FFR allotment in 2006, and on the Joint allotment in 2013. The BLM undertook this effort to ensure that any renewed grazing permit(s) on the allotments are consistent with the BLM's legal and land management obligations. As part of the BLM's evaluation process, rangeland health assessments/evaluations/determinations were completed according to our established procedures. This proposed decision incorporates by reference the information contained in those documents.

The BLM engaged in public scoping and met with members of the public interested in grazing issues in the Ferris FFR and Joint allotments. The process for completing the Jump Creek, Succor Creek, & Cow Creek Watersheds Grazing Permit Renewal Environmental Impact Statement (Chipmunk Group EIS) began with the publication of the Notice of Intent (NOI) in the Federal Register on January 9, 2012. The NOI included a call for resource information and the identification of issues for this project planning effort. The scoping period closed on March 9, 2012, but some relevant comments were submitted after the end of the scoping period. All comments, including those submitted after March 9, 2012, are addressed in the scoping report (which can be found at

http://www.blm.gov/id/st/en/fo/owyhee/owyhee_grazing_group/grazing_permit_renewal0.html)

and were considered during the development of the EIS. The scoping package solicited comments to help us identify issues associated with renewing livestock grazing permits on these allotments. One public scoping meeting was also held from 5:30 PM to 8:30 PM on February 23, 2012; in addition, an open house was held on June 13, 2013, in Marsing, Idaho, with the public arriving and departing at their leisure. The purposes of these meetings were to provide more information about the issues the BLM identified and give the public an opportunity to ask questions and submit input in person.

After evaluating conditions on the land and meeting with you and the public, it became clear there are a few resource concerns currently existing on the Chipmunk Group EIS allotments, which include the Ferris FFR and Joint allotments.

To enable us to focus on addressing livestock impacts to public land resources, my office prepared and issued an environmental impact statement[1] (EIS) in which we considered a number of options and approaches to maintain and improve resource conditions. Specifically, the BLM considered and analyzed in detail five alternatives for the Ferris FFR and Joint allotments. We also considered other alternatives that we did not analyze in detail. Our primary goal in developing alternatives was to consider options that were important to you as the permittee, and to consider options that, if selected, would ensure that the Ferris FFR and Joint allotments' natural resources conform to the goals and objectives of the Owyhee Resource Management Plan (ORMP) and the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (Idaho S&Gs). This proposed decision incorporates by reference the analysis contained in the EIS. The Draft EIS detailing the alternatives below was made available for public review and comment for a 45-day period ending June 17, 2013. In addition to timely comments received from you, a number of government entities and agencies, interest groups, and members of the public also provided comments. Comments that were received are summarized and responses are provided as an appendix to the completed EIS available on the web at:

http://www.blm.gov/id/st/en/prog/nepa_register/owyhee_grazing_group/grazing_permit_renewal0.html

We have completed the first part of the permit renewal process and I am now prepared to issue a proposed decision to authorize livestock grazing within the Ferris and Joint allotments.

This proposed decision will:

- Describe current conditions and issues on the allotments;
- Briefly discuss the alternative grazing management schemes that the BLM considered in the EIS;
- Respond to the application for grazing permit renewal for use in the Ferris FFR and Joint Ferris FFR and Joint allotments;
- Outline my proposed decision to select Alternative 4 in the Ferris FFR allotment and Alternative 3 in the Joint allotment; and
- Set forth my reasons for these proposed decisions.

Background

Allotment Setting

These allotments lie within the Owyhee Uplands, a sagebrush steppe semi-arid landscape of shrubs and widely spaced bunchgrasses. Limited precipitation with cold winters and dry summers constrain plant community and wildlife habitat potential. Native vegetation is primarily Wyoming big sagebrush at lower elevations or mountain big sagebrush at higher elevations, with an understory of various native perennial bunchgrasses. Low sagebrush and bunchgrasses predominate in areas with shallower soils. Precipitation ranges from about 10 inches to 16 inches on the Ferris FFR and Joint allotments and occurs primarily during the winter.[2]

The Ferris FFR allotment is located approximately 7 miles northeast of Jordan Valley, Oregon, in separate parcels to the north and east of Swisher Mountain. Elevations on the allotment range from 4,720 to 6,032 feet. The allotment is divided into three pastures totaling approximately 1,051 acres of public lands, interspersed with a majority of private lands in each pasture (Map 1). The dominant ecological sites on the Ferris FFR allotment have potential to support low sagebrush and mountain big sagebrush plant communities but are currently affected by invasion of annual grasses. Approximately 0.3 miles of Cow Creek supports riparian vegetation on BLM lands in pasture 1 of the allotment.

The Joint allotment is located approximately 7 miles northeast of Jordan Valley, Oregon and directly north of Swisher Mountain. The elevations in this allotment range from 4,860 to 5,722 feet. The allotment is dominated by low sagebrush sites, with some areas of mountain big sagebrush ecological sites; both of these sagebrush community types have potential for bluebunch wheatgrass and/or Idaho fescue in the understory. However, much of the allotment was burned in 1960 and/or 2006 and was subsequently seeded with species that persist today. The allotment consists of three pastures (pastures 2, 3, and 4), with approximately 3,127 acres of public lands with small amounts of private land in each pasture and 954 acres of state land in pasture 4 (Map 1). The allotment supports intermittent streams that have been assessed in pastures 2 (1.9 miles) and 3 (0.5 miles). In addition, six springs or seeps have been assessed in pasture 2, and one each in pastures 3 and 4.

Current Grazing Authorization

You are currently authorized to graze livestock within the Ferris FFR and Joint allotments, and in accordance with a permit issued by the BLM. The terms and conditions of that grazing permit are as follows*:

[2] For more detailed discussion, please refer to the affected environment sections of EIS number DOI-BLM-ID-B030-2012-0014-EIS.

Table LVST-1: John Isernhagen current permit

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
Ferris FFR	147	Cattle	12/1	12/31	100	A	150
Joint	285	Cattle	4/16	7/15	85	A	1,089
Joint	283	Cattle	10/1	11/15	85	A	-^

^Total Active Use for the Joint allotment is 1,089 AUMs total for all seasons

*Standard Terms and Conditions applicable to all BLM grazing permits and leases are not reiterated here, but apply to the above permit.

The following Terms and Conditions apply to the above permit.

Other terms and conditions:

The number of livestock and season of use on the fenced in federal range (FFR) allotment #0545 is at your discretion.

Turnout is subject to Boise District Range Readiness Criteria.

You are required to properly complete, sign and date an actual grazing use report form (4130-5) for each allotment. The completed form(s) must be submitted to this office within 15 days from the last day of your authorized annual grazing use.

Supplemental feeding is limited to salt, mineral and /or protein in block, granular or liquid form. If used, these supplements must be placed at least one-quarter (¼)-mile away from any riparian area, spring, stream, meadow, aspen stand, playa, special status plant population, or water development.

Pursuant to 43 CFR 10.4(B) you must notify the BLM field manager, by telephone with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony (as defined in 43 CFR 10.2) on federal lands. Pursuant to 43 CFR 10.4 (C), you must immediately stop any ongoing activities connected with such discovery and make a reasonable effort to protect the discovered remains or objects.

As a result of Judge Winmill's February 29, 2000, Memorandum Decision and Order the following interim terms and conditions now apply to this grazing authorization:

1. Key herbaceous riparian vegetation, where stream bank stability is dependent upon it, will have a minimum stubble height of 4 inches on the stream bank, along the greenline, after the growing season;
2. Key riparian browse vegetation will not be used more than 50 percent of the current annual twig growth that is within reach of the animals;
3. Key herbaceous riparian vegetation on riparian areas, other than the stream banks, will not be grazed more than 50 percent during the growing season, or 60 percent during the dormant season; and
4. Stream bank damage attributable to grazing livestock will be less than 10 percent on a

stream segment.

Livestock Management

Little information about livestock management practices on the Ferris FFR allotment is available. It has been used at the permittee's discretion, in conjunction with private lands, as long as the permitted use level of 150 AUMs is not exceeded and resource conditions are acceptable on the allotment.

Based upon available actual use reports, pasture 3 of the Joint allotment is typically grazed from mid-April until the first week of June. Use in pasture 2 has ranged from early spring use to fall use, but has most frequently been grazed from early June through mid-July. Pasture 4 has received either summer or fall use in years for which actual use data are available. The pasture was rested for at least two years following the 2006 Chubby Spain wildfire.

Resource Conditions

The BLM completed an Initial Allotment Review to determine status of resource conditions and livestock grazing management for the Ferris FFR allotment in 2006. It was determined that the Ferris FFR allotment is meeting Standard 1 (Watersheds), and not meeting Standards 2 (Riparian Areas and Wetlands), 4 (Native Plant Communities), 7 (Water Quality) and 8 (Threatened and Plants and Animals). Current livestock management practices were determined to be the causal factor for not meeting Standards 2 and 8. Standards 3 (Stream Channel/Floodplain), 5 (Seedings), and 6 (Exotic Plant Communities, Other Than Seedings) do not apply to the Ferris FFR allotment.

A review of the rangeland health conditions, and evaluation/determination were completed for the Joint allotment in 2013. The Joint allotment was found to be meeting Standard 4 (Native Plant Communities), and not meeting Standards 1 (Watersheds), Standards 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain), 5 (Seedings), 7 (Water Quality), and 8 (Threatened and Plants and Animals). Current livestock grazing practices were determined to be the causal factor in not meeting these standards. Standard 6 does not apply to the Joint allotment.

Vegetation - Uplands[3]

Upland vegetation in the Ferris FFR allotment consists of a mixture of seedings and native sagebrush communities. Pasture 3 was found to not be meeting Standard 4, because the community composition is dominated by exotic species and lacks the functional/structural groups expected as a result of historic wildfire. Several occurrences of the noxious weed whitetop have been documented on the allotment. Current livestock management was not identified as a significant causal factor in areas of the Ferris FFR that are failing to meet Standard 4.

Upland vegetation in the Joint allotment consists of native sagebrush communities in various seral stages as a result of wildfires in 1960 and 2006. Post-fire rehabilitation efforts following the 2006 Chubby Spain fire included aerial seeding, which was successful and aided natural recovery of plant communities. Standard 4 applies to pastures 2 and 4, and is being met. Standard 5 applies to pasture 3, and is not being met due to the lack of shrubs in the seeded areas and general lack of

[3] For more detailed discussion, please refer to EIS number DOI-BLM-ID-B030-2012-0014-EIS Section 3.3.1.

diversity in the intermediate wheatgrass seeding. Upland vegetation was found to be meeting Standard 4 but vulnerable to degradation as a result of the fire history in recent decades. Several occurrences of the noxious weed whitetop have been documented on the allotment.

Watersheds

Ferris FFR
Standard 1 is being met on the Ferris FFR allotment. Watersheds provide for the proper nutrient cycling, hydrologic cycling and energy flow.

Joint
The Joint allotment is not meeting Standard 1 for watersheds, and current livestock grazing management practices are significant causal factors in pastures 2 and 3 due to declining conditions in soil and hydrologic function associated with mechanical impacts to soils by livestock hoof action. Post-fire monitoring for pasture 4 indicates that the area burned in 2006 is recovering, but needs to continue to be evaluated over time. Increases in invasive annuals are a concern for watershed function throughout the Joint allotment.

Water Resources and Riparian/Wetland Areas

Ferris FFR
Current livestock grazing management practices are significant causal factors for not meeting Standard 2. Residual vegetation has not been sufficient to maintain or improve riparian-wetland function. The recent grazing schedule has not included rest years, and the spring developments were not designed to protect the ecological function of the riparian-wetland areas. Therefore, current livestock grazing management practices do not conform to Standard 2.

Joint
Current livestock grazing management practices are significant causal factors for failing to meet Standards 2 and 3. The reach of Posey Creek that traverses pasture 2 and the reach of Soda Creek that occurs in pasture 3 within the Joint allotment are functional-at-risk, based on issues with channel instability, incision, and over-widening. The springs that occur within the allotment are functional-at-risk or non-functioning due to undesirable species, non-maintained developments, altered flow patterns, and vertical instability. Both Posey Creek and an unnamed tributary within the allotment are on IDEQ's 303(d) list of impaired waters. BLM data indicate that the reach of Posey Creek that traverses pasture 1 exceeded the water temperature criteria set by the state. Residual vegetation has not been sufficient to maintain or improve riparian-wetland function, and the streams lack the hydric vegetative cover and bank-stabilizing species necessary for the maintenance of stable stream channels. The recent grazing schedule has not included rest years, and the spring developments were not designed to protect the ecological function of the riparian-wetland areas. The grazing management practices have not provided for meeting Idaho's water quality standards. Therefore, current livestock grazing management practices do not conform to Standards 2 and 3; the allotment does not meet Standard 7, but not due to temperature.

Wildlife/Wildlife Habitats and Special Status Animals

Ferris FFR

Upland Habitat: Pastures 1 and 3 are identified as failing to meet Standard 4 due to changes in the plant community resulting from historic fire and invasion of exotic species. The changes in plant community structure and composition reduce effective nesting, escape, hiding, travel, and foraging cover values for all wildlife associated with sagebrush steppe communities. The Ferris FFR allotment is failing to provide adequate upland habitat values for sagebrush steppe wildlife and therefore is not meeting Standard 8 for upland habitat. The entirety of this allotment falls within modeled preliminary priority habitat (PPH)/priority general habitat (PGH) for sage-grouse. Pasture 1 is not providing habitat due to the absence of sagebrush and dominance of exotic grasses, but pastures 2 and 3 are providing suitable upland summer habitat for sage-grouse.

Riparian Habitat: Springs and wetlands that are functional-at-risk or non-functional are lacking adequate riparian vegetation composition and distribution to support a productive riparian wildlife habitat. Because Standards 2 and 7 are not being met, and absent any information to the contrary, this allotment is failing to provide adequate conditions for aquatic and terrestrial wildlife including Columbia spotted frog, and therefore the Ferris FFR allotment is not meeting Standard 8 for riparian/wetland habitat.

Joint

Upland Habitats: Pastures 2 and 4 are managed as native plant communities and are meeting Standard 4. Because Standard 4 is being met and there is no other information available, the plant community is expected to be providing adequate nesting, escape, travel, and hiding cover and accessible forage for wildlife in general. Pasture 3 is managed as a seeding pasture and is failing to meet Standard 5. As discussed above, the pasture is lacking structure and diversity of vegetation, and therefore is not meeting Standard 8. The entire allotment falls within modeled PPH/PGH habitat for sage-grouse and is providing suitable breeding habitat conditions in pastures 2, 3 and 4, and marginal late brood-rearing habitat conditions in pasture 2.

Riparian Habitat: Because Standards 2, 3 (due to current livestock management), and 7 are not being met, as described above, this allotment is failing to provide adequate riparian habitat conditions aquatic and terrestrial species and is therefore not meeting Standard 8. This allotment is within the range of the Columbia spotted frog. Evaluation of Standards 2, 3, and 7 identified streams and springs that are not properly functioning or meeting water quality parameters due to current grazing practices (Standards 2 and 3). Spotted frogs are usually found along vigorous grassy/sedge margins of streams, lakes, ponds, springs, and marshes not far from sources of quiet permanent water. They migrate along these vegetation corridors between habitats used for spring breeding, summer foraging, and winter hibernation. Because streams and springs are not functioning properly, this allotment is not providing adequate aquatic conditions for this federal candidate species.

Guidelines for Livestock Grazing Management

As part of the Rangeland Health Evaluation and Determination process, current livestock grazing management practices have been evaluated relative to the Idaho Guidelines for Livestock Grazing Management in areas where one or more Standards were found to be either not met, or not making progress toward being met. My proposed decision will, in part, implement livestock grazing management practices that conform with the Guidelines, and correct the deficiencies outlined below.

Ferris FFR
The Ferris FFR allotment was determined to not be in conformance with guidelines for livestock grazing management #1, 2, 3, 4, 5, 6, 7 and 10, which has resulted in failing to meet or make progress toward meeting Standards 2 and 8, as described above. A description of each of these guidelines follows.

Joint
The Joint allotment was determined to not be in conformance with the guidelines for livestock grazing management #1, 2, 3, 7 and 8. A description of these guidelines follows.

The BLM's 2013 Determinations for the Ferris FFR and Joint allotments identified grazing management practices that did not conform to the BLM's Guidelines for Livestock Grazing Management for Idaho. Specifically, grazing management did not conform to the following guidelines:

> *Guideline 1: Use grazing management practices and/or facilities to maintain or promote significant progress toward adequate amounts of ground cover (determined on an ecological site basis) to support infiltration, maintain soil moisture storage, and stabilize soils.*
>
> *Guideline 2: Locate livestock management facilities away from riparian areas wherever they conflict with achieving or maintaining riparian-wetland functions.*
>
> *Guideline 3: Use grazing management practices and/or facilities to maintain or promote soil conditions that support water infiltration, plant vigor, and permeability rates and minimize soil compaction appropriate to site potential.*
>
> *Guideline 4: Implement grazing management practices that provide 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 to site potential.*
>
> *Guideline 5: Maintain or promote 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.*
>
> *Guideline 6: The development of springs, seeps, or other projects affecting water and associated resources shall be designed to protect the ecological functions, wildlife habitat, and significant cultural and historical/archaeological/paleontological values associated with the water source.*
>
> *Guideline 7: Apply grazing management practices to maintain, promote, or progress toward appropriate stream channel and streambank morphology and functions. Adverse impacts due to livestock grazing will be addressed.*
>
> *Guideline 10: Implement grazing management practices and/or facilities that provide for complying with the Idaho Water Quality Standards.*

Issues

Throughout the internal and external (public) scoping process and project development period, the BLM interdisciplinary team identified the following issues concerning livestock grazing management in one or more of the Chipmunk Group allotments. The identified issues that may be applicable to the Ferris FFR and Joint allotments are listed below[4]:

1. Habitat conditions for greater sage-grouse (*Centrocercus urophasianus*; from this point on referred to as sage-grouse): Sage-grouse habitat health is directly related to upland vegetation and watershed conditions. Specific areas of the Chipmunk Group allotments contain altered sagebrush community composition, structure, and function that are affecting sage-grouse and other sagebrush habitat-dependent species.
2. Riparian vegetation conditions: Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.
3. Fish and amphibian habitat conditions: Stream, floodplain, wetland, and mesic (moderately moist) habitat conditions are directly related to conditions within the riparian vegetation community. Altering of the riparian community may affect the health and sustainability of fish and amphibian populations.
4. Upland vegetation and watershed conditions: Livestock grazing is affecting upland vegetation by reducing or removing native vegetation communities that protect watershed soil and hydrologic function.
5. Noxious and invasive weeds: Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.
6. Socioeconomic impacts: Livestock grazing affects local and regional socioeconomic activities generated by livestock production.
7. Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire.
8. Climate Change: The issue of climate change and its relationship to the proposed federal action of renewing grazing permits is twofold. Livestock grazing in Owyhee County contributes CO2 and methane emissions to the earth's atmosphere. In addition, climate change, itself a stressor on the sagebrush-steppe semi-arid ecosystem found in the Owyhee Uplands can, when found in conjunction with cattle grazing, further stress the ecosystem's vegetation.

Analysis of Alternative Actions

In response to the current conditions of the Ferris FFR and Joint allotments and the issues identified above, the BLM considered a number of alternative livestock management schemes in the EIS to ensure that any renewed grazing permit would result in maintaining or improving satisfactory conditions and to provide for significant progress toward meeting standards where unsatisfactory conditions were identified on the allotments. Overall, six alternatives were considered and analyzed in the EIS, five of which were considered in detail and analyzed for the Ferris FFR and Joint allotments. The range of alternatives developed include: Alternative 1 – No

[4] Issues identified through the scoping process that are not applicable to these allotments are not listed here. These include bighorn sheep conflicts, special status plant species, Wild Horse and Burro Management Areas, and livestock trailing.

Action/Current Condition, Alternative 2 – Permittee's Application, and Alternative 6 – No Grazing, as well as Alternatives 3 and 4, which were developed based on resource constraints. A summary of the analyzed alternatives for the Ferris FFR and Joint allotments follows:

Alternative 1 would implement a continuation of your current management on the allotments, with the terms and conditions of the current permit, as outlined above. Permitted use would be 150 AUMs for the Ferris FFR allotment and 1,089 AUMs on the Joint allotment.

Alternative 2 would authorize the livestock grazing schedule for which you applied on June 3, 2011. Implementation of this alternative would change the season of use on the Ferris FFR allotment to year-round and extend the season of use on the Joint allotment to 4/16-11/15, annually.

Alternative 3 would implement 3-year deferred grazing rotations for the pastures of the Ferris FFR and Joint allotments, which would postpone grazing until after the growing season in each pasture for 1 or 2 years of each 3-year cycle. The season of use would be 5/15-10/29 for the Ferris FFR allotment and 4/16-12/30 for the Joint allotment. Permitted use for the Joint allotment would also be reduced from 1,089 AUMs to 601 AUMs, while permitted use on the Ferris FFR allotment would be maintained at the current level of 150 AUMs. This alternative would also include Allowable Use Criteria of 6-inch stubble height, 30 percent browse, less than 10 percent streambank alteration in riparian areas, and a 7-inch perennial grass height in uplands as terms and conditions on the permit.

Alternative 4 would implement more conservative deferred-rotation grazing systems for the Ferris FFR and Joint allotments, as compared to Alternative 3. The season of use would be 5/15-2/25 for the Ferris FFR allotment and 4/16-12/30 for the Joint allotment. Permitted use levels would be the same as for Alternative 3. Pasture 1 of the Ferris FFR allotment would be used during the active growing period in 1 of 3 years, and the pastures of the Joint allotment would only be used during the active growing period in 1 of 3 years. All other grazing use on the allotments would occur after the growing season, in late summer through fall.

Alternative 5 does not apply to these allotments.

Alternative 6 is the No Grazing Alternative, and would not authorize grazing for a period of 10 years for the Ferris FFR and Joint allotments.

Proposed Decision

After considering the current grazing practices, the current conditions of the natural resources, and the alternatives and analysis in the EIS, as well as other information, it is my proposed decision to authorize grazing for a period of ten years as outlined below:

Ferris FFR – Alternative 4 as described in EIS number DOI-BLM-ID-B030-2012-0014-EIS.

Joint – Alternative 3 as described in EIS number DOI-BLM-ID-B030-2012-0014-EIS

Implementation of these alternatives over the next 10 years will allow the Ferris FFR and Joint allotments to meet or make significant progress toward meeting the Idaho S&Gs while also moving toward achieving the resource objectives outlined in the ORMP.

The terms and conditions of the grazing permit(s) will be as follows:

Table LVST-2: Proposed decision for the Ferris FFR and Joint allotments

Allotment	Livestock		Grazing Period		% PL[5]	Type Use	AUMs[6]
	Number	Kind	Begin	End			
Ferris FFR	48	C	5/15	2/25	33	A	150
Joint	285	C	4/16	12/30	85	A	601

Other Terms and Conditions:

1. The number of livestock and the season of use on the fenced federal range (FFR) allotment will be in accordance with the allotment grazing schedule. Changes in scheduled pasture use dates will require prior authorization. Livestock numbers may run up to 147 head, not to exceed AUMs and are based on 33 percent public land.
2. Grazing in Joint will be in the spring in 2 in 3 years (4/16-7/15) and will be deferred to fall use (10/1 to 12/30) 1 in every 3 years. Livestock numbers will not exceed 285 head, not to exceed authorized AUMs.
3. A minimum of 6-inch stubble height, 30 percent browse (where applicable), and less than 10 percent bank alteration will be maintained in key riparian areas at the end of the grazing season on the Joint allotment.
4. Maintain an average of greater than 18 cm (7 inches) perennial grass height on upland key species on the Joint allotment.

As noted in term and condition #1, the grazing schedule for the Ferris allotment (identified below) must be followed:

Table LVST-3: Ferris FFR allotment grazing schedule

Pasture	Year 1	Year 2	Year 3
1	5/15-7/17	9/1-11/2	9/1-11/2
2	7/18-8/6	11/3-11/22	11/3-11/22
3	8/7-12/5	11/23-2/15	11/23-2/25

The grazing schedule for the Joint must be followed:

Table LVST-4: Joint allotment grazing schedule

Pasture	Year 1	Year 2	Year 3
2	4/16-5/29	10/1-11/13	4/16-5/29
3	5/30-7/1	11/14-12/16	5/30-7/1
4	7/2-7/15	12/17-12/30	7/2-7/15

[5] Percent unfenced public land by allotment

[6] The sum of the AUMs from the permit schedule may not equal the Active Use AUMs due to individual line calculations and rounding in the AUM calculation.

Other Notes on the Proposed Decision

Finally, it is my proposed decision not to authorize additional projects. The existing coordinated process to identify, analyze, and authorize as appropriate the restoration, improvement, or development of livestock water sources and other projects remains in place for project-specific consideration outside the permit renewal process. Project maintenance obligations identified in current range improvement permits and cooperative agreements for range improvements are unchanged by this proposed decision. Implementation of this proposed decision is contingent upon maintenance of projects in a functioning condition (i.e., boundary and internal fences are in such good and functioning condition as to assure their ability to accomplish the purposes for which they were constructed, barriers to livestock movement). The above process shall be followed to address design issues for spring developments on the Ferris FFR allotment that were identified as limiting health of springs or seeps on the allotment in the 2013 evaluation/determination.

In addition to the above allotment-specific terms and conditions, the following standard Boise District terms and conditions will be applied to your grazing permit:

1. Grazing use will be in accordance with the grazing schedule identified in the final decision of the Owyhee Field Office Manager dated _____. Livestock grazing will be in accordance with your allotment grazing schedule(s). Changes to the scheduled use require approval.
2. Turn-out is subject to the Boise District range readiness criteria.
3. The permittee's certified actual use report is due within 15 days of completing the authorized annual grazing use.
4. Salt and/or supplements shall not be placed within one-quarter (1/4)-mile of springs, streams, meadows, aspen stands, playas, special status plant populations or water developments.
5. Trailing activities must be coordinated with the BLM prior to initiation. A trailing permit or similar authorization may be required prior to crossing public lands.
6. Pursuant to 43 CFR 10.4(B), the permittee must notify the BLM field manager, by telephone with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony (as defined in 43 CFR 10.2) on federal lands. Pursuant to 43 CFR 10.4 (C), the permittee must immediately stop any ongoing activities connected with such discovery and make a reasonable effort to protect the discovered remains or objects.
7. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use.
8. Range improvements must be maintained in accordance with the cooperative agreement and range improvement permit in which you are a signatory or assignee. All maintenance of range improvements within designated Wilderness requires prior consultation with the authorized officer.
9. All appropriate documentation regarding base property leases, lands offered for exchange-of-use, and livestock control agreements must be approved prior to turn out. Leases of land and/or livestock must be notarized prior to submission and be in compliance with Boise District Policy.
10. Failure to pay the grazing bill within 15 days of the due date specified shall result in a late fee assessment of $25.00 or 10 percent of the grazing bill, whichever is greater, not to exceed $250.00. Payment made later than 15 days after the due date shall include the

appropriate late fee assessment. Failure to make payment within 30 days may be a violation of 43 CFR § 4140.1(b)(1) and shall result in action by the authorized officer under 43 CFR § 4150.1 and § 4160.1.

11. Livestock grazing will be in accordance with your allotment grazing schedule(s). Changes in scheduled pasture use dates will require prior authorization.
12. Utilization may not exceed 50 percent of the current year's growth.

Rationale

Record of Performance

Pursuant to 43 CFR § 4110.1(b)(1), a grazing permit may not be renewed if the permittee seeking renewal has an unsatisfactory record of performance with respect to its last grazing permit. Accordingly, I have reviewed your records as a grazing permit holder for the Ferris FFR and Joint allotments, and have determined that overall, you have a satisfactory record of performance and are a qualified applicant for the purposes of a permit renewal. However, the record indicates that lack of maintenance of certain riparian improvement projects on the Joint allotment are resulting in unsatisfactory conditions. Maintenance of projects that are in disrepair must be completed prior to turnout, as required by the Terms and Conditions of your permit.

Justification for the Proposed Decision

Based on my review of EIS number DOI-BLM-ID-B030-2012-0014-EIS, the rangeland health assessments/evaluations, determinations for these allotments, and other documents in the grazing files, it is my proposed decision to select Alternative 4 for the Ferris FFR allotment and Alternative 3 for the Joint allotment. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will best fulfill the BLM's obligation to manage the public lands under the Federal Land Policy and Management Act's multiple use and sustained yield mandate, and will result in the Ferris FFR and Joint allotments meeting or making significant progress toward meeting the resource objectives of the ORMP and the Idaho S&Gs.

Issues Addressed

Earlier in this decision, I outlined the major issues that drove the analysis and decision making process for the Ferris FFR and Joint allotments. I want you to know that I considered the issues specific to these allotments through the lens of each alternative before I made my decision. My selection of Alternative 4 for the Ferris FFR allotment and Alternative 3 for the Joint allotment was in large part because of my understanding that this selection best addressed those issues, given the BLM's legal and land management obligations.[7]

[7] As you know, your allotments are part of a group of six allotments forming the Owyhee 68 Allotments, which large group is the subject of a permit renewal process which must be completed by December 31, 2013. The NEPA process for the Owyhee 68 consists of 5-plus EAs and the EIS which supports this particular set of decisions. This multiple-allotment process has required me, as the Field Manager responsible for signing these grazing decisions, to look at these allotments, and the other allotments analyzed in the EAs and the EIS, not just individually but as a members of a group of allotments located in a particular landscape, the BLM Owyhee Field Office. That is, while I am looking at your individual allotment, reviewing its RHA/Evaluation/Determination, and selecting an alternative that will best address the allotment's ecological conditions and BLM's legal responsibilities (for the purposes of this decision), I am

Issue 1: Habitat conditions for greater sage-grouse (Centrocercus urophasianus; from this point on referred to as sage-grouse): Sage-grouse habitat health is directly related to upland vegetation and watershed conditions. Specific areas of the Chipmunk Group allotments contain altered sagebrush community composition, structure, and function that are affecting sage-grouse and other sagebrush habitat-dependent species.

AND

Issue 4: Upland vegetation and watershed conditions: Livestock grazing is affecting upland vegetation by reducing or removing native vegetation communities that protect watershed soil and hydrologic function.

The sage–grouse is an indicator species for the sagebrush ecosystem, thus the attributes of suitable sage-grouse habitat provide an effective barometer for health of the sagebrush ecosystems that dominate the Ferris FFR and Joint allotments. Sage-grouse habitat quality is inseparable from the vegetation community conditions discussed in Standard 4 (Native Plant Communities). Therefore, the following is a combined rationale for my alternative selections as they relate to the issues of sage-grouse habitat and upland vegetation and watershed conditions.

Ferris FFR[8]

While Standard 4 is currently not being met in pasture 3 of the Ferris FFR allotment, livestock management is not identified as a significant causal factor. However, the allotment has been used at the permittee's discretion, with varying numbers of cattle, and at various times of year. Implementation of Alternative 4 would institute a defined grazing system, with spring grazing 1 in 3 years, and deferred grazing in 2 of 3 years. This grazing system will be in conformance with the Guidelines for Livestock Grazing Management and would result in maintenance or slight improvement of upland vegetation conditions. While significant progress toward meeting

---

also looking at the allotment from a landscape perspective. From this perspective, there are problems common to the Owyhee 68 Allotments. Of the approximately 60 allotments that have riparian areas, at least 47 are not meeting S&Gs for riparian/water issues due to current livestock management; of approximately 73 allotments, 43 are not meeting the Standard for upland vegetation. In many cases, performance under Standard 8 tracks these results. Despite of the efforts of BLM and the ranching operators, resource conditions are not good. Some of these allotments have been used in the spring year after year; some have had summer-long riparian use every year. As Field Manager for the Owyhees, I have a steward's responsibility to further the health and resilience of this landscape.

Climate change presents an uncertainty whose impacts we cannot clearly discern, but as land stewards, we must factor into our decisions a consideration of how best to promote resiliency on the landscape. Add to this the uncertainty associated with the BLM's organizational capacity to manage this landscape: in a time of budget cutting, staff reductions, and reduced revenues, land management decisions must factor in considerations of the level of on-the-ground management we can reasonably expect to accomplish. These compelling factors create the need to develop grazing management on individual allotments that combines the greatest assurance of ecological resilience with the most likely anticipated organizational ability, and which does so on a landscape level. My challenge is this: looking out at the field office, what intensity of management can I reasonably expect to accomplish, knowing that when BLM selects an alternative that requires intensive management from BLM (i.e.--continuous and intensive monitoring or other workloads that need to occur every year) it also accepts the risk and responsibility of that system's failure which could include a decreasing ecological health for the allotment at issue. My responsibility and challenge here is to make decisions that can be successfully implemented by BLM over the long term and that will lead to success which includes healthy, sustainable resource conditions and predictability for ranching operators.

[8] For more detailed discussion, please refer to EIS number DOI-BLM-ID-B030-2012-0014-EIS Section 3.6.4 and Appendix E.

standards remains contingent upon the interaction of climatic conditions and identified causal factors, including wildfire and invasive species, this alternative has the potential to enhance the vigor and resilience of the plant communities, and thus the wildlife community, on this allotment.

Joint[9]
Watershed, vegetative, and upland/riparian wildlife habitat conditions would improve throughout the allotment under Alternative 3 due to this alternative's focus on improving the health and vigor of plant communities. Improvement will be accomplished by limiting the AUMs within each pasture, and providing regular deferment, until after the growing season for perennial grasses. Additionally, proper nutrient cycling, hydrologic cycling, and energy flow will continue to be maintained or improved. Increased years of deferment will allow opportunity to make significant progress toward meeting upland vegetation health and vigor. Reductions in AUMs will allow adequate recovery to upland vegetation. While Standard 4 is already being met and sage-grouse habitat is suitable in those pastures analyzed under this Standard (2 and 4) in the Joint allotment, limiting AUMs and regularly deferring use of each pasture (including pasture 3) will result in additional improvements in upland health. Additionally, maintenance of a 7-inch stubble height of herbaceous plants in the uplands will provide for additional concealment cover for sage-grouse and other small animals.

Issue 2: Riparian vegetation conditions: Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.

AND

Issue 3: Fish and amphibian habitat conditions: Stream, floodplain, wetland, and mesic (moderately moist) habitat conditions are directly related to conditions within the riparian vegetation community. Altering of the riparian community may affect the health and sustainability of fish and amphibian populations.

Ferris FFR
Implementation of this grazing rotation specified in Alternative 4 is expected to result in significant progress toward meeting Standards 2 and 8. The incorporation of a deferred rotation system would prohibit grazing during the riparian area's most vulnerable time in 2 of 3 years; thus, the Standards (2 and 7) associated with the riparian and water resources would make progress under this alternative while maintaining current levels of permitted use. Overall, significant progress toward meeting Standard 2 will be made.

Joint
Under the management proposed in Alternative 3, pasture 2 of the Joint allotment would be under a 3-year rotation that would allow grazing during the spring 2 of 3 years and would defer grazing until fall of the third year. This system is expected to result in significant progress toward meeting the Standards associated with the riparian and water resources through increased protection of streambanks and improved cover and vigor of woody and herbaceous hydric species (2, 3, and 7). Grazing pasture 4 of the Joint allotment during the summer for 2 years and deferring until the fall

[9] For more detailed discussion, please refer to EIS number DOI-BLM-ID-B030-2012-0014-EIS Section 3.6.5 and Appendix E.

of the third year, coupled with a 33 percent reduction in AUMs over the life of the permit, would result in significant progress toward meeting Standards 2, 3, and 7.

Issue 5: Noxious and invasive weeds: Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.

Ferris FFR and Joint[10]
Both the Ferris FFR and Joint allotments have known occurrences of the noxious weed whitetop. Although any grazing has the potential to introduce and spread invasive weeds and non-native annual grasses, the reduction in active use inherent in Alternative 3 for the Joint allotment will result in proportionally less soil surface disturbance and fewer animals that could carry seed to and from the allotment in fur, on hooves, and in their digestive system. As compared to Alternatives 1 and 2, the risk of invasive species spreading will decrease under implementation of Alternatives 3 and 4 as native perennial species health and vigor is improved and progress is made toward the ORMP vegetation management objective. Available sites for invasive species establishment will be reduced through competition with healthy native perennial species.

Although Alternative 6 would further reduce the potential for livestock to introduce and spread invasive and non-native annual species as compared to all alternatives that would continue to authorize grazing within the Ferris FFR and Joint allotments, livestock remain only one of a number of vectors for seed dispersal and soil surface disturbance. BLM's coordinated and ongoing weed control program would still be required in the absence of livestock grazing in the allotment.

There are several known locations of the noxious species whitetop on each allotment. Both will continue to be monitored and controlled by the Boise District BLM weeds program.

Issue 6: Socioeconomic impacts: Livestock grazing affects local and regional socioeconomic activities generated by livestock production.

Ferris FFR/Joint
During the NEPA and public comment process, some raised the concern that selection of certain alternatives considered in the EIS could impact regional socio-economic activity. I share this concern, and have taken these concerns into consideration in making my decision; however, my primary obligation is to ensure that the new grazing permit(s) protects resources in a manner consistent with the BLM's obligations under the Idaho S&Gs and the ORMP. As noted above, I have selected Alternative 4 for the Ferris FFR allotment and Alternative 3 for the Joint allotment in large part because those selections accomplish those latter goals while minimizing short-term socio-economic impacts.

Over the long term, your grazing operation relies upon maintenance of the natural resources, including productive and healthy rangelands capable of supplying a reliable forage base. Selection of an alternative based in unsustainable grazing practices that do not meet rangeland health standards would result in less reliable amounts of forage over the long-term, in addition to reducing

[10] For more detailed discussion, please refer to EIS number DOI-BLM-ID-B030-2012-0014-EIS Section 3.3.2 and Appendix E.

economic opportunities from ecosystem services and alternate socio-economic resources, such as recreation, that rely on healthy, functional and aesthetically pleasing open spaces and wildlife habitats.

Issue 7: Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire.

Ferris FFR/Joint
During the NEPA process, some asked the BLM to consider using grazing to limit wildfire. The BLM has considered the issue and determined that it would be theoretically possible to use targeted grazing to create fuel breaks on these allotments with the hope that those fuel breaks would help control the spread of large wildfires in the area. However, the resource costs associated with this strategy are such that I have decided against it. Ultimately, implementation of Alternative 4 for the Ferris FFR allotment and Alternative 3 for the Joint allotment will not significantly alter the BLM's ability to fight wildfire in the area.

Although a number of sources identify the potential to use grazing to reduce fine fuels on a landscape scale, identified benefits are greatest with targeted grazing that strategically maintains fuel-breaks to aid fire suppression actions. Landscape-scale fuels reduction with livestock grazing has its greatest application in grass-dominated vegetation types and specifically within seedings of grazing tolerant introduced grasses and annual grasses. Such conditions do not exist on these allotments at a pasture-wide scale. In addition, the levels of livestock grazing and the season of yearly use necessary to reduce fine fuels prior to the fire season are not conducive to sustaining native perennial herbaceous species. This is one of the main reasons a targeted grazing system to control fire is not viable on these allotments at this time. The BLM's current permit renewal process is focused on improving native upland and riparian plant communities on these allotments, and targeted grazing to create fuel breaks would not support that improvement.

The selected alternatives retain a level of grazing use that reduces the accumulation of fine fuels, and thus will lessen the spread of large wildfires when fire weather conditions are less extreme. More importantly, it is designed to benefit and promote the health and vigor of native perennial species on the allotment, thereby limiting the dominance of annual species and so limiting the accumulation of continuous fine fuels and extreme fire behavior, while enhancing post-fire recovery.[11]

Issue 8: The issue of climate change and its relationship to the proposed federal action of renewing grazing permits is twofold. Livestock grazing in Owyhee County contributes CO2 and methane emissions to the earth's atmosphere. In addition, climate change, itself a stressor on the sagebrush-steppe semi-arid ecosystem found in the Owyhee Uplands can, when found in conjunction with cattle grazing, further stress the ecosystem's vegetation.

I have made these proposed decisions against the background of uncertainty posed by climate change. The alternatives selected will promote vigor and rangeland health across these allotments, armoring the plant and animal communities with increased resiliency in the face of change.

[11] For more detailed discussion, please refer to EIS number DOI-BLM-ID-B030-2012-0014-EIS Section 2.4.

Additional Rationale

I did consider selecting Alternative 6 (No Grazing) for these allotments; however, based on all the information used in developing my decision, I believe that the BLM can meet resource objectives and still allow grazing on the allotments. In selecting Alternative 4 for the Ferris FFR allotment and Alternative 3 for the Joint allotment, rather than Alternative 6, I especially considered (1) BLM's ability to meet resource objectives using the selected alternatives, (2) the impact of implementation of Alternative 6 on the your operation and on regional economic activity, and (3) your past performance under previous permits. The Ferris FFR and Joint grazing allotments were found to not be meeting or making progress toward meeting all applicable Standards for Rangeland Health under current livestock management. Therefore, continuation of grazing on these allotments with the changes identified above is will result in meeting resource objectives while providing for multiple uses of the public lands. By implementing these alternatives, the resource issues identified will be addressed. The suspension of grazing for a ten-year period is not the management decision most appropriate at this time in light of these factors.

Conclusion

It is my proposed decision to select Alternative 4 for the Ferris FFR allotment, and Alternative 3 for the Joint allotment, over other alternatives because livestock management practices under this selection best meet the ORMP objectives allotment-wide and the Idaho S&Gs consistent with the projected ability of BLM to oversee grazing on these allotments over the next several years. Alternatives 1 and 2 fail to implement livestock management practices on the Joint allotment that would meet the objectives and standards. Specifically, both alternatives fail to implement actions that would meet Standards 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain), and Standard 8 (Threatened and Endangered Animals). Alternative 6 removes the economic activity of livestock operations from Owyhee County and southwest Idaho, a region where livestock production and agriculture is a large portion of the economy. That, in conjunction with current resource conditions and the improvement anticipated by implementation of the alternatives, as supplemented, lead me to believe elimination of livestock grazing from the Ferris FFR and Joint allotments is unnecessary at this point.

Authority

The authorities under which this decision is being issued include the Taylor Grazing Act of 1934, as amended, and the Federal Land Policy and Management Act of 1976, as promulgated through Title 43 of the Code of Federal Regulations (CFR) Subpart 4100 Grazing Administration - Exclusive of Alaska. My decision is issued under the following specific regulations:

- 4100.0-8 Land use plans; The ORMP designates the Ferris FFR and Joint allotments as available for livestock grazing;
- 4130.2 Grazing permits or leases. Grazing permits may be issued to qualified applicants on lands designated as available for livestock grazing. Grazing permits shall be issued for a term of 10 years unless the authorized officer determines that a lesser term is in the best interest of sound management;
- 4130.3 Terms and conditions. Grazing permits must specify the term and conditions that are needed to achieve desired resource conditions, including both mandatory and other terms and conditions; and

- 4180 Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration. This proposed decision will result in taking appropriate action to modifying existing grazing management in order to make significant progress toward achieving rangeland health.

Right of Protest and/or Appeal

Any applicant, permittee, lessee or other interested publics may protest the proposed decision under Sec. 43 CFR § 4160.1 and 4160.2, in person or in writing within 15 days after receipt of such decision to:

Loretta V. Chandler
Owyhee Field Office Manager
20 First Avenue West
Marsing, Idaho 83639

The protest, if filed should clearly and concisely state the reason(s) why the proposed decision is in error.

In accordance with 43 CFR § 4160.3(a), in the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice unless otherwise provided in the proposed decision.

In accordance with 43 CFR § 4160.3(b), upon a timely filing of a protest, after a review of protest received and other information pertinent to the case, the authorized officer shall issue a final decision.

Any applicant, permittee, lessee or other person whose interest is adversely affected by the final decision may file an appeal in writing in for the purpose of a hearing before an administrative law judge in accordance with 43 CFR § 4160.3(c), 4160.4, 4.21, and 4.470. The appeal must be filed within 30 days following receipt of the final decision or within 30 days after the date the proposed decision becomes final. The appeal may be accompanied by a petition for a stay of the decision in accordance with 43 CFR § 4.471 pending final determination on appeal. The appeal and petition for a stay must be filed in the office of the authorized officer, as noted above. In accordance with 43 CFR § 4.401, the BLM does not accept fax or email filing of a notice of appeal and petition for stay. Any notice of appeal and/or petition for stay must be sent or delivered to the office of the authorized officer by mail or personal delivery.

Within 15 days of filing the appeal, or the appeal and petition for stay, with the BLM officer named above, the appellant must also serve copies on other person named in the copies sent to section of this decision in accordance with 43 CFR 4.421 and on the Office of the Field Solicitor located at the address below in accordance with 43 CFR § 4.470(a) and 4.471(b).

Boise Field Solicitors Office
University Plaza
960 Broadway Ave., Suite 400
Boise Idaho, 83706

The appeal shall state the reasons, clearly and concisely, why the appellant thinks the final decision is in error and otherwise complies with the provisions of 43 CFR § 4.470.

Should you wish to file a petition for a stay, see 43 CFR § 4.471 (a) and (b). In accordance with 43 CFR § 4.471(c), a petition for a stay must show sufficient justification based on the following standards:

(1) The relative harm to the parties if the stay is granted or denied.
(2) The likelihood of the appellant's success on the merits.
(3) The likelihood of immediate and irreparable harm if the stay is not granted, and
(4) Whether the public interest favors granting the stay.

As noted above, the petition for stay must be filed in the office of the authorized officer and served in accordance with 43 CFR § 4.471.

Any person named in the decision that receives a copy of a petition for a stay and/or an appeal, see 43 CFR § 4.472(b) for procedures to follow if you wish to respond.

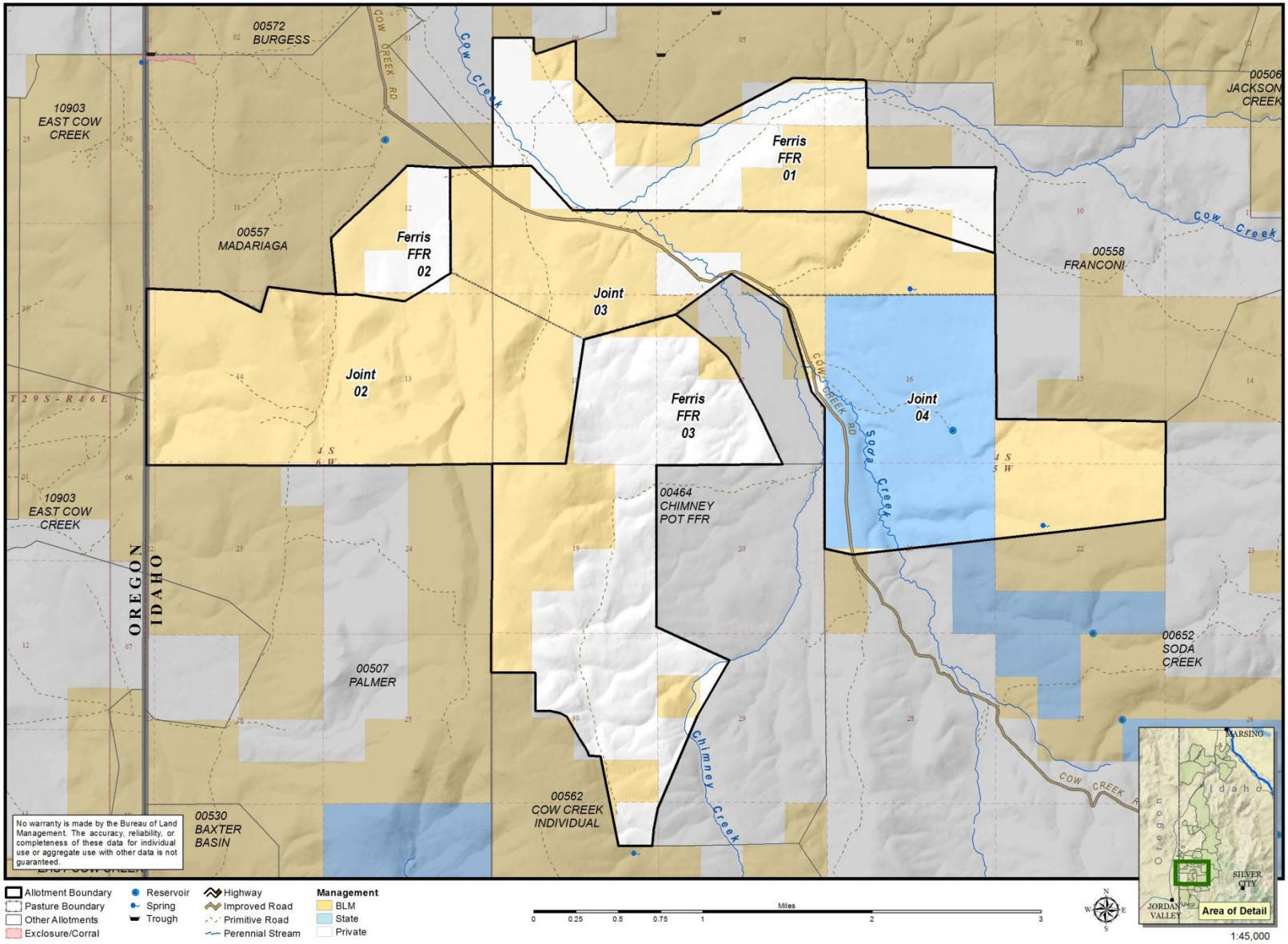
If you have any questions, please contact me at 208-896-5913.

Sincerely,

Loretta V. Chandler
Field Manager
Owyhee Field Office

Attachments: Maps 1

Map 1, Ferris FFR (00545) and Joint (00531) Allotments



Copies sent to:

Company Name	Title	First Name	Last Name	Address 1	City	ST	Zip	# copies
Boise District Grazing Board		Stan	Boyd	PO Box 2596	Boise	ID	83701	1
Chipmunk Grazing Association		Elias	Jaca	PO Box 175	Marsing	ID	83639	2
Colyer Cattle Co.		Ray & Bonnie	Colyer	31001 Colyer Rd.	Bruneau	ID	83604	3
Elordi Cattle Co.		Jim	Elordi	PO Box 55	Jordan Valley	OR	97910	4
Elordi Sheep Camp, Inc.		Richard	Elordi	14448 Bighorn Dr.	Nampa	ID	83651	5
Idaho Wild Sheep Foundation	President	Jim	Jeffress	PO BOX 8224	Boise	ID	82707	6
Friends of Mustangs		Robert	Amidon	8699 Gantz Ave.	Boise	ID	83709	7
Gusman Ranch Grazing Association LLC		Forest	Fretwell	27058 Pleasant Valley Rd.	Jordan Valley	OR	97910	8
Holland & Hart LLP				PO Box 2527	Boise	ID	83701	9
Idaho Conservation League		John	Robison	PO Box 844	Boise	ID	83701	10
Idaho Dept. of Agriculture		John	Biar	PO Box 790	Boise	ID	83707	11
IDEQ				1410 N. Hilton	Boise	ID	83701	12
Idaho Dept. of Lands				PO Box 83720	Boise	ID	83720	13
Idaho Dept. of Parks & Recreation	Director			PO Box 83720	Boise	ID	83720	14
Idaho Farm Bureau Fed.				PO Box 167	Boise	ID	83701	15
Intermountain Range Consultants		Bob	Schweigert	5700 Dimick Ln.	Winnemucca	NV	89445	16
International Society for the Protection of Horses & Burros		Karen	Sussman	PO Box 55	Lantry	SD	57636	17
Jaca Livestock		Elias	Jaca	817 Blaine Ave.	Nampa	ID	83651	18
Juniper Mtn. Grazing Association		Michael	Stanford	3581 Cliffs Rd.	Jordan Valley	OR	97910	19
Land & Water Fund		William	Eddie	PO Box 1612	Boise	ID	83701	20
LS Cattle Co.	c/o	Jeff	Stanford	PO Box 217	Jordan Valley	OR	97910	21
LS Cattle Co		Jerry	Stanford	PO Box 281	Jordan Valley	OR	97910	22
LU Ranching	c/o	Bill	Lowry	PO Box 132	Jordan Valley	OR	97910	23
LU Ranching		Tim	Lowry	PO Box 132	Jordan Valley	OR	97910	24
Moore Smith Buxton & Turcke		Paul	Turcke	950 W. Bannock, Ste. 520	Boise	ID	83702	25
Natural Resources Defence Council		Johanna	Wald	111 Sutter St., 20th Floor	San Francisco	CA	94104	26
Oregon Division State Lands				1645 NE Forbes Rd., Ste. 112	Bend	OR	97701	27
Owyhee Cattlemen's Association				PO Box 400	Marsing	ID	83639	28

Company Name	Title	First Name	Last Name	Address 1	City	ST	Zip	# copies
Owyhee County Commissioners				PO Box 128	Murphy	ID	83650	29
Owyhee County Natural Resources Committee		Jim	Desmond	PO Box 38	Murphy	ID	83650	30
Poison Creek Grazing Association LLC		Tim	Mackenzie	PO Box 443	Homedale	ID	83628	31
R&S Enterprise		Ray	Mitchell	265 Millard Rd.	Shoshone	ID	83352	32
Ranges West				2410 Little Weiser Rd.	Indian Valley	ID	83632	33
Resource Advisory Council	Chair.	Gene	Gray	2393 Watts Lane	Payette	ID	83661	34
Schroeder & Lezamiz Law Offices				PO Box 267	Boise	ID	83701	35
	Senator	Mike	Crapo	251 East Front Street, STE 205	Boise	ID	83702	36
	Senator	James E.	Risch	350 N. 9th Street STE 302	Boise	ID	83702	37
Shoshone-Bannock Tribes	Tribal Chair	Nathan	Small	PO Box 306	Ft. Hall	ID	83203	38
Sierra Club				PO Box 552	Boise	ID	83701	39
Soil Conservation District		Cindy	Bachman	PO Box 186	Bruneau	ID	83604	40
State Historic Preservation Office				210 Main St.	Boise	ID	83702	41
State of Nevada Div. of Wildlife				60 Youth Center Rd.	Elko	NV	89801	42
The Fund for the Animals, Inc.		Andrea	Lococo	1363 Overbacker	Louisville	KY	40208	43
The Nature Conservancy				950 W. Bannock, Ste. 210	Boise	ID	83702	44
The Wilderness Society				950 W. Bannock St., Ste. 605	Boise	ID	83702 -5999	45
U.S.F.W.S. Idaho State Office				1387 S. Vinnell Way, Ste. 368	Boise	ID	83709	46
USDA Farm Services				9173 W. Barnes	Boise	ID	83704	47
Western Watershed Projects		Katie	Fite	PO Box 2863	Boise	ID	83701	48
Western Watershed Projects				PO Box 1770	Hailey	ID	83333	49
		Doug	Burgess	2725 Mule Springs Rd.	Homedale	ID	83628	50
		Ted	Blackstock	6754 Opaline Rd.	Given Springs	ID	83641	51
		Alan	Johnstone	2740 Egurrola Ln.	Homedale	ID	83628	52
		Tim	McBride	1445 US 95 South	Jordan Valley	OR	97910	53
		Conrad	Bateman	740 Yakima St.	Vale	OR	97918	54
		Gene	Bray	5654 W El Gato Ln.	Meridian	ID	83642	55
		Sean & Andrea	Burch	PO Box 284	Jordan Valley	OR	97910	56
		Chad	Gibson	16770 Agate Ln.	Wilder	ID	83676	57
		Chad & Dannelle	Hensley	4300 Choctaw Dr.	Nampa	ID	83686	58

Company Name	Title	First Name	Last Name	Address 1	City	ST	Zip	# copies
		Russ	Heughins	10370 W Landmark Ct.	Boise	ID	83704	59
		Dan	Jordan	30911 Hwy. 78	Oreana	ID	83650	60
		Floyd	Kelly Breach	9674 Hardtrigger Rd.	Given Springs	ID	83641	61
		Kenny	Kershner	PO Box 300	Jordan Valley	OR	97910	62
		Vernon	Kershner	PO Box 38	Jordan Valley	OR	97910	63
		Lloyd	Knight	PO Box 47	Hammett	ID	83627	64
		Sandra	Mitchell	PO Box 70001	Boise	ID	83707	65
		Brett	Nelson	9127 W. Preece St.	Boise	ID	83704	66
		Ramona	Pascoe	PO Box 126	Jordan Valley	OR	97910	67
		Anthony & Brenda	Richards	8935 Whiskey Mtn. Rd., Reynolds Creek	Murphy	ID	83650	68
		John	Romero	17000 2X Ranch Rd.	Murphy	ID	83650	69
		Bob	Salter	6109 N. River Glenn	Garden City	ID	83714	70
		John	Townsend	8306 Road 3.2 NE	Moses Lake	WA	98837	71
		John	Richards	8933 State Hwy. 78	Marsing	ID	83639	72
	Congressman	Raul	Labrador	33 E. Broadway Ave STE 251	Meridian	ID	83642	73
	Congressman	Mike	Simpson	802 West Bannock STE 600	Boise	ID	83702	74
		John	Isernhagen	2618 Cow Creek Rd.	Jordan Valley	OR	97910	75
		Marti & Susan	Jaca	21127 Upper Reynolds Cr. Rd.	Murphy	ID	83650	76
		Ed	Moser	22901 N. Lansing Ln.	Middleton	ID	83644	77
		Bill	Baker	2432 N. Washington	Emmett	ID	83617 -9126	78
Lequerica & Sons Inc.		Tim	Lequerica	PO Box 135	Arock	OR	97902	79
Office of Species Conservation		Cally	Younger	304 N. 8th STE 149	Boise	ID	83702	80