



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Challis Field Office
1151 Blue Mountain Road
Challis, Idaho 83226



In Reply Refer To:
4130/8120 (IDI030)

March 5, 2013

Dear Interested Public:

You are receiving this letter because you are on the interested public mailing list for the Upper Pahsimeroi and Goldburg allotments permit renewal process. The Upper Pahsimeroi Allotment includes 5,617 acres of the 24,980 acres of the Burnt Creek Wilderness Study Area (WSA), and the Goldburg Allotment includes 1,180 acres of the 3,985 acre Goldburg WSA (see attached maps). The Upper Pahsimeroi and Goldburg Ten Year Grazing Permit Renewal EA #ID-330-2007-EA-3275 was sent out for wilderness review in December 2008. Comments were received from Western Watersheds Project and Idaho Department of Lands.

Due to other workload commitments, the National Environmental Policy Act (NEPA) process for the grazing permit renewal for the Upper Pahsimeroi and Goldburg allotments was placed on hold until now. The purpose of this letter is to update and inform interested and affected parties of the proposal and to solicit comments to assist with the NEPA review of the proposal. Analysis of the proposal is ongoing, and will be documented in an Environmental Assessment (EA) with an estimated completion date of September 2013. Comments received in response to this solicitation will be used to identify potential environmental issues related to the proposed action and to identify alternatives to the proposed action that meet the purpose of and need for the project.

Purpose and Need for Action

The Challis Resource Management Plan (RMP), 1999, identifies the Upper Pahsimeroi and Goldburg allotments as available for domestic livestock grazing. Where consistent with the goals and objectives of RMPs, and Idaho's Standards for Rangeland Health and Guidelines for Livestock Grazing Management (USDI-BLM, 1997), it is Bureau of Land Management (BLM) policy to authorize livestock grazing to qualified operators. The purpose of the proposed action is to allow permittees the opportunity to access federal lands for livestock grazing and provide for associated range improvements consistent with BLM policy and in a manner that maintains or improves project area resource conditions and achieves the objectives described in the Challis RMP. The need is established by BLM's responsibility to respond to this application for permit

renewal as required by the Taylor Grazing Act of 1934 and the Federal Land Policy and Management Act (FLPMA).

Additional needs associated with this permit renewal application include consideration of:

- The need to consider timing and intensity of use of livestock grazing in regards to sage grouse nesting and seasonal habitats.
- Carlson Creek and the unsaturated riparian/wetland areas are functioning at risk with no apparent trend.
- There is a need to incorporate additional flexibility into the management of the allotments in order to allow the BLM, Idaho Department of Lands, and individual grazing permit holders to be able to adapt management to changing resource conditions and to comply with BLM policy.
- Additional water sources and fencing may be necessary to provide alternate water sources to streams and upland springs to change livestock use patterns.
- There is a need to lessen the bank alteration on Goldberg Creek and to improve bank stability.
- There is a need to increase the diversity and amount of herbaceous understory vegetation in the Wyoming big sagebrush community types to improve sagebrush obligate habitat.
- The need to consider timing and intensity of use of livestock grazing in regards to sage grouse nesting and seasonal habitats.

Proposed Action

The permittee has applied to renew the grazing permit for the Upper Pahsimeroi and Goldberg allotments with the existing mandatory terms and conditions (see Table 1). The permittee has also requested to modify fence construction along some allotment boundaries to take down fences that could be taken down after livestock grazing is completed for the season, extension of existing fencing between the US Forest Service (USFS) Pahsimeroi Allotment and the BLM Upper Pahsimeroi Allotment to prevent drift between allotments, flexibility in the grazing system to consider sage grouse needs and flexibility to manage the Goldberg Allotment within the Idaho Department of State Lands management plan.

Allotment	Number/ Kind	Grazing Season		% PL	Permitted Use	Suspended	Total
		Begin	End				
Goldburg	250 C	06/01	08/06	14	77	0	77
Upper Pahsimeroi	700 C	05/19	10/08	100	3291 (scheduled)	0	3306

Preliminary Issues

Table 2. Issues Identified for the Upper Pahsimeroi and Goldberg Allotments Through Internal and External Scoping	
Resource	Resource Issue
Soils	How is livestock grazing impacting ground cover? What impacts will the construction of range improvements have on soils? Will the proposed action and alternatives allow for the maintenance and/or significant movement towards achievement of Standard 1? How would flexibility in the timing of use impact soils?
Vegetation	How does grazing impact vegetation composition? Will the proposed action and alternatives allow for the maintenance and/or significant movement towards achievement of Standard 4? How would flexibility in timing of use impact vegetation? What grazing use indicators and criteria will be used in the uplands?
Invasive/Non-Native Species	How will the proposed actions and alternatives (including range improvements and trailing) impact the abundance and distribution of invasive/non-native species for these two allotments? Cumulative impacts – trailing?
Wetland and Riparian Zones	How will springs and streams be impacted by livestock grazing and development for stock water use? How will functionality be impacted by the proposed action and alternatives? Will the proposed action and alternatives allow for the maintenance and/or significant movement towards achievement of Standards 2&3? How would flexibility in timing of use affect wetland and riparian areas? What are the grazing use indicators and criteria and how will they be used?
Water Quality	How will water quality be impacted by the proposed action and alternatives? How will the proposed actions and alternatives impact the current listing of streams under the Clean Water Act? Will the proposed action and alternatives allow for the maintenance and/or significant movement towards achievement of Standard 7?
Fisheries	How will the prescribed grazing (timing, frequency, duration, intensity, and distribution) affect special status species (SSS) fish and spawning? How will the prescribed grazing (timing, frequency, duration, intensity, and distribution) affect ESA designated critical fish habitat (Chinook salmon and bull trout)? Will the proposed action and alternatives allow for the maintenance and/or significant movement towards achievement of Standard 8? How would flexibility in timing of use impact fisheries? How will fish be impacted by trailing through the Pahsimeroi River Enclosure on the County Road? How will fish and/or fish habitat be impacted within the

Table 2. Issues Identified for the Upper Pahsimeroi and Goldburg Allotments Through Internal and External Scoping

Resource	Resource Issue
	River Pasture along the Pahsimeroi River and Goldburg Creek? Need to consider cumulative impacts of trailing to Mahogany Creek and Goldburg Creek?
Wildlife	How will proposed vegetation treatment impact sagebrush obligate species? How will the prescribed grazing (timing, frequency, duration, and intensity) impact identified sage grouse habitat? Are existing range improvements (fencing) impacting sage-grouse? How will critical winter deer, elk, pronghorn antelope, and bighorn sheep habitat be impacted by the proposed action and alternatives? Will the proposed action and alternatives allow for the maintenance and/or significant movement towards achievement of Standard 8? How will migratory birds be impacted by the proposed action and alternatives?
Recreation	How will the proposed action and alternatives affect the availability and use of recreation resources?
Existing and Potential Uses	How will the proposed action and alternatives impact the existing and potential uses? How will the proposed action and alternatives impact the use on other lands (i.e. state, private, and Forest Service)? Do the mandatory terms and conditions need to be modified for the Goldburg Allotment to match the proposed management on the State lands?
Social Economics	How would the operator(s) be impacted by the proposed action and alternatives? How would Custer County be impacted by the proposed action and alternatives? How would the operators be impacted by flexibility in timing of use?
Visual Resources	How would the character of the viewshed be impacted by livestock grazing and the proposed range improvements?
Wilderness Values	Will wilderness values be impaired by the proposed action and alternatives?
Lands with Wilderness Characteristics	Are lands with wilderness characteristics present within the project area and would those characteristics be impacted by the proposed action or alternatives?
Tribal Treaty Rights	How would access to and utilization of treaty-reserved resources be impacted by the proposed action and alternatives?

Preliminary Alternative Development

1. **Alternative 1: BLM developed alternative to address identified issues**
This alternative would include potential modification of the prescribed grazing (i.e. numbers and kind of livestock, timing of use, duration of use, and frequency of use), modification of grazing use criteria specifically to address sage grouse needs, vegetation treatment of 700 acres within the West River Flat Pasture to increase herbaceous understory within the Wyoming big sagebrush ecological sites, and additional range improvements to provide alternative water sources and to ensure significant progress toward meeting the Standards for Rangeland Health.
2. **Alternative 2: Current permitted use**
This alternative would continue to authorize grazing with the same terms and conditions as on the existing grazing permit without any new range improvements
3. **Alternative 3: No grazing**
Under this alternative no grazing would be authorized for a ten year period, but the operator would retain grazing preference for Upper Pahsimeroi and Goldburg allotments.
4. **Alternative 4: Actual use**
This alternative would be based on actual use. The mandatory terms and conditions would be modified based on actual use data.

Decision to be Made

The Challis Field Manager is the official responsible for decisions regarding the management of the Upper Pahsimeroi and Goldburg allotments. Based on the results of NEPA analysis, the Field Manager will determine if the action would have significant effects; if so, an EIS would be prepared. If the action will not have significant effects, a Finding of No Significant Impact (FONSI) would be prepared. Following appropriate NEPA analysis, the Field Manager would issue a grazing decision document or documents consistent with 43 CFR 4160 that includes: 1) the allotment to be used, 2) the kind and number of livestock, 3) the period of use, 4) the number of animal unit months (AUMs), 5) Other Terms and Conditions that ensure conformance with subpart 4180 Fundamentals of Rangeland Health, 6) the term of the permit, and 7) other management actions (i.e. authorization of construction of range improvements, salting locations, actual use, and etc.).

The factors to be considered when selecting from alternatives would be:

- The degree to which the alternative(s) meet the purpose and need for action.
- The nature and intensity of environmental impacts that would result from implementation and the expected effectiveness of related mitigations.
- The degree to which the alternative(s) are consistent with the IM-2012-043 Greater Sage-Grouse Interim Management Policies and Procedures.
- The degree to which the alternative(s) are consistent with ESA consultation for bull trout, steelhead, and Chinook salmon and a determination of NLAA.
- Compliance with RMP.
- Compliance with 6330 Management of WSAs.

Public Input Needed

Comments are specifically requested on the proposed action, preliminary issues, and alternatives. Comments made on this proposal would be most helpful if they are received by April 5, 2013, and are directly relevant to the proposal and project area. The BLM will not reject public feedback outside established public involvement timeframes; however, these comments may be considered secondary to comments received in a timely manner and may only be assessed to determine if they identify concerns that would substantially alter the assumptions, proposal, design, or analysis presented in the EA. Comments should be sent to the Challis Field Office at 1151 Blue Mountain Road, Challis, Idaho 83226. Please identify whether you are submitting comments as an individual or as the designated spokesperson on behalf of an organization. Issues that are outside the scope of the proposal will not be addressed at this planning level.

The primary contact for questions and comments for this analysis is Peggy Redick, Supervisory Resource Management Specialist.

Maps

The maps sent with the Upper Pahsimeroi and Goldberg Ten Year Grazing Permit Renewal EA #ID-330-2007-EA-3275 for wilderness review in December 2008 are enclosed with this letter.

If you have any questions, please contact me or Peggy Redick at 208-879-6200.

Sincerely,

/s/Todd Kuck

Todd Kuck
Field Manager

Enclosures