



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

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In Reply Refer To:
4160 ID130

November 26, 2013

Robert Thomas
17947 Shortcut Road
Oreana, ID 83650

Notice of Field Manager's Proposed Decision

Dear Mr. Thomas:

Thank you for your application to renew your grazing permit on the Alder Creek FFR grazing allotment. Thank you also for working with the BLM through this permit renewal process; I appreciate your interest in grazing your allotment in a sustainable fashion and am confident that this proposed decision achieves that objective.

As you know, the BLM evaluated current grazing practices and resource conditions in the Alder Creek FFR allotment to ensure that any renewed grazing permit on the allotment is consistent with the BLM's legal and land management obligations. As part of the BLM's evaluation process, a rangeland health assessment, evaluation and determination for the Alder Creek FFR allotment was completed in 2006. These documents were updated and supplemented, and a new determination of compliance with rangeland health standards was signed October 21, 2013, taking into consideration the updated rangeland health assessment (USDI BLM, 2013). This proposed decision incorporates by reference the information contained in those documents.

The BLM's Owyhee Field Office initiated a public scoping process for renewal of grazing permits on the Group 3, or Toy Mountain Group, allotments by mailing a letter to interested publics and grazing permittees in January, 2013. The letter solicited comments and information to identify resource and management issues associated with the Idaho Rangeland Health Standards and Guidelines (Idaho S&Gs) and the Owyhee Resource Management Plan (ORMP) (USDI BLM, 1999) for the purpose of developing grazing management alternatives for allotments in the Toy Mountain Group, which includes the Alder Creek FFR allotment.

After evaluating conditions on the land and reviewing comments received during the scoping process, it became clear that resource concerns currently exist on the Toy Mountain Group allotments. You submitted an application for renewal of this grazing permit, which was received by the BLM on May 29, 2013. With respect to the Alder Creek FFR allotment, your application

requested a renewed authorization under essentially the same terms and conditions as your previous permit, which allows number of livestock and season of use at your discretion, within authorized AUM levels.

With the focus of addressing livestock grazing's impacts to public land resources, my office prepared an environmental assessment (EA) in which we considered a number of options and approaches to maintain and improve resource conditions for the Toy Mountain Group allotments (NEPA #DOI-BLM-ID_030-2013-0021-EA). The BLM considered and analyzed in detail five alternatives for the Alder Creek FFR allotment, and also considered other alternatives but did not analyze them in detail for various reasons as described in the EA. Our overarching 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 Alder Creek FFR allotment's natural resources conform to the goals and objectives of the ORMP and Idaho S&Gs. This proposed decision incorporates by reference the analysis contained in the EA.

In response to your application for grazing permit renewal, I am now prepared to issue a proposed decision to authorize livestock grazing within the Alder Creek FFR allotment. This decision is the culmination of a comprehensive review of the relationship between resource conditions and livestock grazing practices on the Alder Creek FFR allotment, completed in accordance with the grazing regulations, Idaho S&Gs, the National Environmental Policy Act (NEPA), and the ORMP. This proposed decision will:

- Describe current conditions and issues on the allotment;
- Briefly discuss the alternative grazing management schemes that the BLM considered in the EA;
- Respond to the application for grazing permit renewal for use in the Alder Creek FFR;
- Outline my proposed decision to select Alternative 4 in the Alder Creek FFR allotment; and
- State my reasons for making this selection.

Background

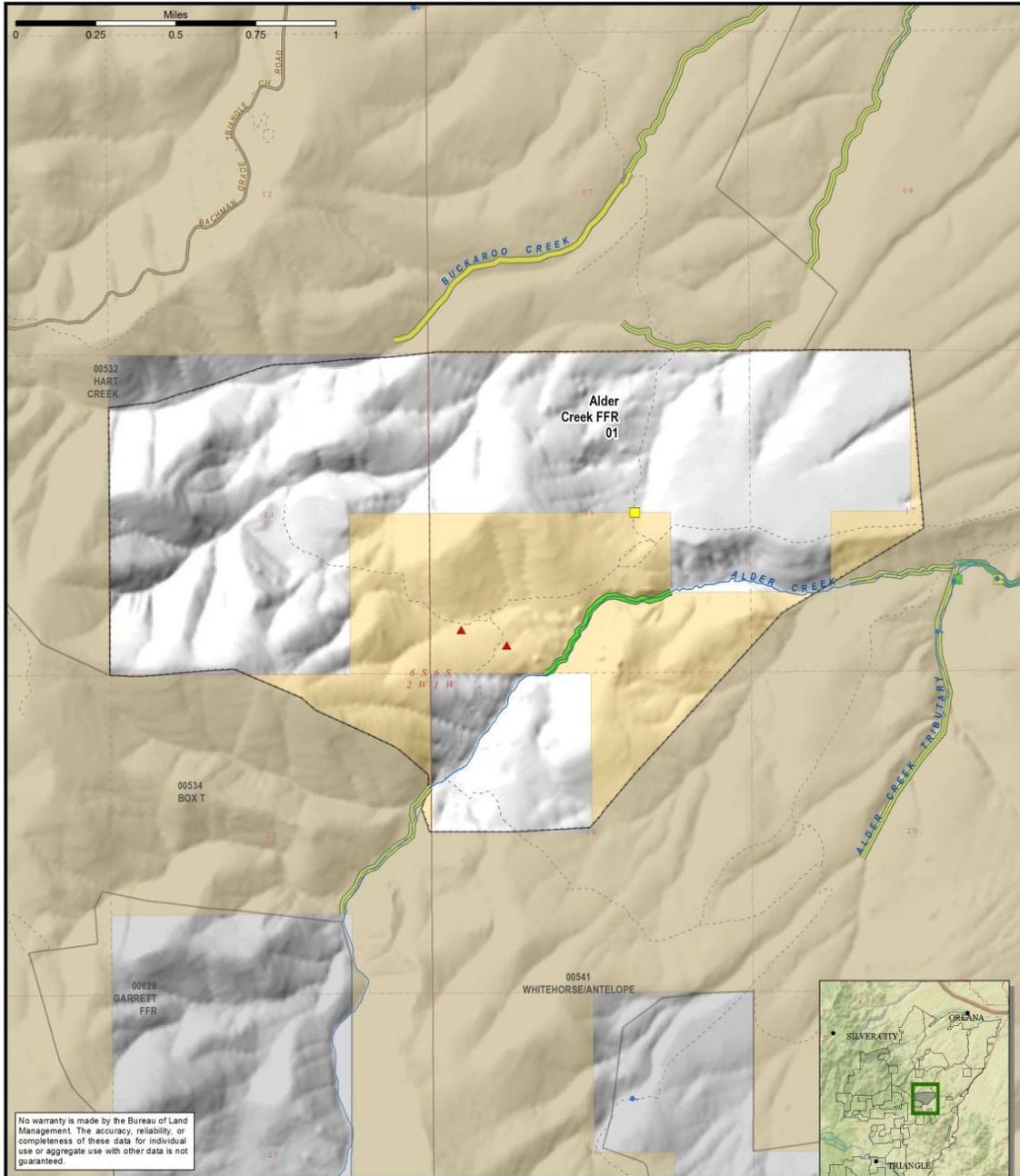
Allotment Setting

The Alder Creek FFR allotment is situated within the Owyhee Uplands, a sagebrush steppe semi-arid landscape of shrubs and widely spaced bunchgrasses. The allotment is located approximately 12 miles southwest of Oreana, Idaho, and just east of Toy Pass. The elevations in this allotment range from 4,200 to 5,907 feet. Limited precipitation with cold winters and dry summers constrain plant community and wildlife habitat potential. Precipitation ranges from about 12 to 16 inches on the Alder Creek FFR allotment and occurs primarily during the winter.¹ The allotment is dominated by mountain big sagebrush ecological sites, with potential for bluebunch wheatgrass/Idaho fescue in the understory. The allotment consists of one pasture encompassing approximately 535 acres of BLM lands and 1,238 acres of private lands (Map 1).

¹ For more detailed discussion, please refer to the affected environment sections of EIS number DOI-BLM-ID-B030-2012-0014-EIS.



Map 1: Alder Creek FFR (00639) Allotment



No warranty is made by the Bureau of Land Management. The accuracy, reliability, or completeness of these data for individual use or aggregate use with other data is not guaranteed.

- | | | | | |
|--------------------------------|------------|--------------------------|------------------|-------------------|
| Allotment of Interest Boundary | Stock Pond | Assessment Rating | Perennial Stream | Management |
| Pasture Boundary | Spring | PFC | Improved Road | BLM |
| Range Monitoring | Trough | FAR | 4WD Road | State |
| Nestled Plot Frequency Trend | Exclosure | NF | Water Body | Private |
| RHA Point | | | | |

1:25,000

Current Grazing Authorization

You are currently authorized to graze cattle on the Alder Creek FFR allotment in accordance with a permit issued by the BLM. Although the season of use is defined as 12/1-12/31, due to the predominance of private land acreage in the allotment you have been afforded the flexibility to use the Alder Creek FFR allotment at your discretion, so long as animal unit months (AUMs) on public lands are not exceeded, and resource conditions are met. The terms and conditions of the BLM grazing permit are as follows.*

Table LVST-1: Alder Creek FFR current grazing permit

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
Alder Creek FFR	59	Cattle	12/01	12/31	100	Active	60

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

Terms and conditions:

1. The number of livestock and season of use on the fenced federal range (FFR) allotment #0606 are at your discretion.
2. Turnout is subject to the Boise District range readiness criteria.
3. Your certified actual use report is due within 15 days of completing your authorized annual grazing use.
4. Salt and/or supplement shall not be placed within one-quarter (1/4)-mile of springs, streams, meadows, aspen stands, playas, and water developments.
5. Changes to the scheduled use require prior approval.
6. 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.
7. Livestock enclosures located within your grazing allotments are closed to all domestic grazing use.
8. Range improvements must be maintained in accordance with the cooperative agreements and range improvement permits in which you are a signatory or assignee. All maintenance of range improvements within wilderness study areas requires prior consultation with the authorized officer.
9. All appropriate documentation regarding base property leases, land offered for exchange-of-use, and livestock control agreements must be approved prior to turnout. 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, but 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 schematic(s). Changes in scheduled pasture use dates will require prior authorization.
12. Utilization may not exceed 50 percent of the current year's growth.
13. United States District Court for the District of Idaho imposed terms and conditions

- 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;
- 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;
- 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
- Stream bank damage attributable to grazing livestock will be less than 10 percent on a stream segment.

Livestock Management

The current permit authorizes 60 AUMs annually on BLM lands and a season of use of December 1-31;² however, based upon recent actual use records, the Alder Creek FFR allotment has been used from about April 20 through mid-June in most years, and has occasionally been grazed as late as July 5. In 2012, the allotment was also used for 2 weeks in November. Actual use is important when considering the renewal of a grazing permit because current conditions on the allotment are the result of the actual use, including timing and intensity of forage removal, rather than the season of use and livestock numbers described on the permit.

Resource Conditions³

The BLM completed a rangeland health assessment, evaluation and determination for the Alder Creek FFR allotment in 2006. These documents were updated and supplemented, and a new determination of compliance with rangeland health standards was signed October 21, 2013, taking into consideration the updated rangeland health assessment. Those document identified resource conditions on the Alder Creek FFR allotment which resulted in the determination that Standards 1, 2, 3, 4, and 8 are not being met and current livestock grazing is a causal factor. Standards 5 and 6 are not applicable to this allotment, and Standard 7 is being met.

Vegetation - Uplands

BLM lands in the Alder Creek FFR allotment feature mostly of mountain big sagebrush ecological sites, with smaller acreages of Wyoming, basin, low, and black sagebrush sites. Deep-rooted, mid-stature perennial bunchgrasses, such as Idaho fescue and bluebunch wheatgrass, are the expected understory in these sagebrush ecological sites, and juniper is generally expected to occur in trace amounts, or be absent from these sites, based upon ecological site descriptions.

Standard 4 (Native Plant Communities) is not met in the Alder Creek FFR allotment due to shifts in the relative abundance of the expected plant functional/structural groups. Western juniper is scattered to common, and 7 percent of the allotment is mapped as juniper cover type. There has been a general decrease in deep-rooted, mid-stature bunchgrasses such as Idaho fescue and bluebunch wheatgrass, relative to site potential. In addition, sage-grouse habitat assessment data

² Although the season of use in the grazing permit states 59 cattle and a season from 12/1-12/31 in the Mandatory Terms and Conditions, the permit states that “The number of livestock and season of use is at your discretion” in the Other Terms and Conditions, which allows flexibility.

³ For more detailed discussion resource conditions please refer to EA number DOI-BLM-ID-B030-2013-0021-EA.

from 2012 indicate that cheatgrass is now prevalent on the allotment, suggesting deteriorating vegetation conditions. Annual livestock grazing use during the spring growing season has resulted in a decline in the frequency of desirable deep-rooted perennial bunchgrass species. Annual growing season use leads to a determination that in addition to historic livestock use that led to the decline of deep-rooted perennial bunchgrasses, current livestock management practices are a significant causal factor contributing toward not meeting Standard 4. Juniper encroachment is also a causal factor in failure to meet the Standard.

Watersheds

Current livestock grazing management practices are significant causal factors for not meeting upland watershed Standard 1 in the Alder Creek FFR allotment. Signs of increased erosion, such as water flow patterns and historic and active pedestaling, indicate decreased watershed function. Soil surface resistance to erosion is reduced, especially where native deep-rooted bunchgrasses are missing and where interspaces are not stabilized by persistent cover. This is especially important on erosive granitic soils and steep topography that dominate much of the Alder Creek FFR allotment. Additional declines in soil stability are associated with mechanical damage from hoof action, increased water flow patterns, and reduced microbiotic crusts. Junipers do not appear to be driving negative hydrologic functions at this site, although with continued expansion, their role in hydrologic function would become more significant. At lower elevations, continued increases in cheatgrass have the potential to impact nutrient cycling and energy flow. Livestock management is the primary causal factor for not meeting Standard 1 and ORMP soil management objectives of improving unsatisfactory watershed health/conditions in the Alder Creek FFR allotment due to repeated spring grazing use.

Water Resources and Riparian/Wetland Areas

Standards 2 (Riparian Areas and Wetlands) and 3 (Stream Channel/Floodplain) are not being met in the Alder Creek FFR allotment; Standard 7 (Water Quality) is being met. The reach of Alder Creek that traverses BLM lands in the allotment was most recently rated as being in proper functioning condition (PFC) overall because the stream is armored with large boulders and dense willows, but livestock impacts were reducing bank stability in accessible portions of the reach. However, short-term indicator data for bank alteration and woody use reflect impacts associated with livestock use exceeding appropriate limits along accessible portions of the reach. One unnamed seep was rated functional at-risk (FAR) in 2013 because the flow patterns had been altered by excessive trampling and there was heavy use of riparian vegetation. Residual vegetation has not been sufficient to maintain or improve riparian-wetland function at the assessed spring and accessible portions of Alder Creek, and the recent grazing schedule has not allowed rest or deferment years.

Special Status Plants

As stated in Section 3.1.4 of EA # DOI-BLM-ID-B030-2013-0021-EA, there are no populations of special status plant species known to occur in this allotment.

Wildlife/Wildlife Habitats and Special Status Animals

The Alder Creek FFR allotment is not meeting Standard 8 (Threatened and Endangered Plants and Animals), and current livestock practices are significant factors. BLM lands within the

allotment are entirely within sage-grouse preliminary priority habitat, and may be used by sage-grouse throughout the year. At least five sage-grouse leks occur within 4 miles of the Alder Creek FFR allotment. Upland habitat for sage-grouse and other sagebrush-obligate wildlife species is limited by encroachment of juniper and cheatgrass, reduced abundance of deep-rooted perennial grasses, and increased shrubs. As described above, under Vegetation – Uplands, reductions in abundance and vigor of desirable mid-stature perennial bunchgrasses is attributed to repeated grazing during the active growth period for those species.

One perennial creek, Alder Creek, occurs on the allotment, and supports redband trout. Alder Creek is in PFC, but habitat quality is limited due to over-utilization of willows and streambank alteration where Alder Creek is accessible to livestock. Streambank alteration is associated with stream sedimentation, which can impact trout redds and fry, while over-utilization willows reduces their ability to expand along the reach and stabilize streambanks and shade the stream.

Guidelines for Livestock Grazing Management

Livestock management practices do 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 3 – Locate livestock management facilities away from riparian areas wherever they conflict with achieving or maintaining riparian-wetland functions.

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 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 7- Apply grazing management practices that maintain, promote or progress toward appropriate stream channel and streambank morphology and functions. Adverse impacts due to livestock grazing will be addressed.

Guideline 8 – Apply grazing management practices that maintain or promote the interaction of the hydrologic cycle, nutrient cycle, and energy flow that will support the appropriate types and amounts of soil organisms, plants, and animals appropriate to soil type, climate, and landform.

Guideline 9-Apply grazing management practices to maintain adequate plant vigor for seed production, seed dispersal, and seedling survival of desirable species relative to soil type, climate, and landform;

Guideline 12-Apply grazing management practices and/or facilities that maintain or promote the physical and biological conditions necessary to sustain native plant populations and wildlife habitats in native plant communities.

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 Toy Mountain Group allotments. The identified issues that may be applicable to the Alder Creek FFR allotment are listed below⁴:

Issue 1: *Improve upland vegetation plant communities, and in particular, reverse the shift from desirable to undesirable native plant communities.*

Issue 2: *Improve watershed conditions within upland sites.*

Issue 3: *Limit juniper encroachment into shrub-steppe vegetation types.*

Issue 4: *Prevent introduction and spread of noxious and invasive annual species (e.g., cheatgrass).*

Issue 5: *Improve riparian vegetation and stream-bank stability associated with streams and springs/seeps.*

Issue 6: *Improve wildlife habitats, and habitats necessary to meet objectives for sagebrush-dependent species, including sage-grouse.*

Issue 7: *Consider whether grazing can be used to limit wildfire.*

Issue 8: *Consider the issue of climate change and its relationship to the proposed federal action of renewing grazing permits. 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.*

Issue 9: *Consider impacts to regional socioeconomic activity generated by livestock production.*

Analysis of Alternative Actions

Based on the current condition of the Alder Creek FFR allotment and the issues identified above, the BLM considered a number of alternative livestock management schemes in the EA to ensure that any renewed grazing permit would result in maintaining or improving satisfactory conditions and continuing to provide for significant progress towards meeting standards where unsatisfactory conditions have been identified on the allotment. Overall, five alternatives were considered and analyzed in the EA, each of which was considered in detail and analyzed for the Alder Creek FFR allotment. The range of alternatives developed include: Alternative 1 - Current situation, Alternative 2 - Applicants' Proposed Action, and Alternative 5 - No Grazing, as well as Alternatives 3 and 4, which were developed based on resource constraints and grazing strategies. The following section briefly describes each alternative, as it applies to the Alder Creek FFR allotment.

⁴ The issue of maintaining or improving habitat for special-status plant species is not discussed in this decision because no special-status plant species are known to occur on the Alder Creek FFR allotment.

Alternative 1 - Current Situation

This alternative would allow a continuation of your current management on the allotment, authorizing 60 AUMs from 12/1 to 12/31, with flexibility to use the allotment at your discretion, as described above, under the current grazing authorization section of this decision. For analysis purposes, it was assumed that the allotment would continue to be used annually during the spring, as reported on recent actual use reports.

Alternative 2 - Applicant's Proposed Action

This alternative would be similar to Alternative 1, although annual indicator criteria would be removed from the permit's Other Terms and Conditions, and the season of use would be changed to 4/16-6/30 to reflect the season in which you report using the Alder Creek FFR in most years.

Alternative 3

Alternative 3 would implement constraints on the season of use for the Alder Creek FFR to reduce impacts to resources, including sage-grouse habitat, redband trout habitat, vegetation, soils, and riparian areas. Under this alternative, 60 AUMs of forage use would be permitted, and a deferred grazing rotation would be implemented, so that use would be deferred until July 1 at least 1 in 3 years.

Alternative 4

This alternative would constrain the season of use more than Alternative 3 to more conservatively manage resources based upon identified rangeland health resource issues. Under this alternative, 52 AUMs of forage use would be permitted, and a deferred grazing rotation would be implemented, which would limit grazing to 10/1-12/15 in 2 out of 3 years. Livestock numbers would be limited to 69 head of cattle, as opposed to Alternatives 1-3, which allow livestock numbers at your discretion.

Alternative 5 - No Grazing

This alternative would not authorize grazing for a period of 10 years for the Alder Creek FFR allotment.

Proposed Decision

After considering the current grazing practices, the current conditions of the natural resources, and the alternatives and analysis in the EA, as well as other information, it is my proposed decision to authorize grazing for a period of 10 years in accordance with Alternative 4, as described in EA #DOI-BLM-ID-B030-2013-0021-EA.

Implementation of this alternative over the next 10 years will allow the Alder Creek FFR allotment to 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) would be as follows:

Table LVST-2: Grazing permit for the Alder Creek FFR allotment

Allotment	Livestock		Grazing Period*		% PL**	Type Use	AUMs
	Number	Kind	Begin	End			
Alder Creek FFR	69	Cattle	4/1	12/15	30	Active	52

*The permitted grazing period includes scheduled spring and fall use. No use is permitted between 6/15 and 9/30.

**The percent public land would be changed from 100% to 30% to accurately reflect the amount of public land on the Alder Creek FFR allotment. Livestock numbers apply to the entire allotment, and permitted AUMs reflect the amount of forage available on the public land portion of the allotment.

The following grazing permit terms and conditions specific to the Alder Creek would be included in the permit offered:

1. Grazing use in the Alder Creek FFR allotment will be in accordance with the grazing schedule identified in the final decision of the Owyhee Field Office Manager dated _____. Changes to the scheduled use require approval by the authorized officer, consistent with Standard Terms and Conditions.
2. A crossing permit for trailing of livestock associated with the grazing authorization in the Alder Creek FFR allotment for the term of this grazing permit and consistent with the final decision of the authorized officer dated _____ is authorized concurrent with this grazing permit.

The following applicable Boise District grazing permit terms and conditions would be included in the permit offered:

1. Turn-out is subject to the Boise District range readiness criteria.
2. The permittee’s certified actual use report is due within 15 days of completing the authorized annual grazing use.
3. 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.
4. Trailing activities, other than the allotment specific crossing authorization identified above, must be coordinated with the BLM prior to initiation. A crossing permit or similar authorization may be required prior to trailing livestock on public lands.
5. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use.
6. 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.
7. 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.
8. Utilization may not exceed 50 percent of the current year’s growth.

The following grazing schedule would be applied to the Alder Creek FFR allotment:

Table LVST-3: Grazing schedule for the Alder Creek FFR allotment

Pasture	Year 1	Year 2	Year 3
1	10/1 to 12/15	10/1 to 12/15	4/1 to 6/14

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 Alder Creek FFR, Hart Creek, Box T, and Meadow Creek FFR grazing allotments, and have determined that you have a satisfactory record of performance and are a qualified applicant for the purposes of permit renewal.

Justification for the Proposed Decision

Based on my review of EA number DOI-BLM-ID-B030-2013-0021-EA, the rangeland health assessment/evaluation, determination, and other documents in the grazing files, it is my proposed decision to select Alternative 4 for the Alder Creek FFR 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 (FLPMA) multiple use and sustained yield mandate and will result in the Alder Creek FFR allotment meeting or making significant progress towards meeting the resource objectives of the ORMP and the Idaho S&Gs. Active AUMs authorized on public land within the Alder Creek FFR allotment would be reduced to 52 AUMs, and the stocking rate for public land in the Alder Creek FFR allotment would be approximately 10 acres per AUM, a conservative stocking rate consistent with ecological site potential within the allotment, as limited by inventoried condition, water availability, and topography⁵.

Issues Addressed

Earlier in this decision I outlined the major issues that drove the analysis and decision making process for the Alder Creek FFR allotment. I want you to know that I considered the issues through the lens of each alternative before I made my decision. My selection of Alternative 4 for the Alder Creek FFR allotment was due in large part to my understanding that this selection best addressed those issues and resource conditions on this allotment, given the BLM's legal and land management responsibilities.⁶

⁵ In accordance with regulation pertaining to reducing permitted use (43 CFR 4110.3-2), reductions in active use AUMs to meet Rangeland Health Standards or make significant progress, as well as reductions in active use AUMs to meet ORMP management objectives, would be implemented by reducing permitted use. Active use AUMs no longer available would not be converted to suspension. Suspension AUMs held on permits prior to this planning process would continue to be held on permits as suspension.

⁶ As you know, your allotment is part of a group of 20 allotments that form the Toy Mountain Group allotments and the larger Owyhee 68 allotments, and is the subject of a permit renewal process to be completed by December 31,

Issue 1: Improve upland vegetation plant communities, and in particular, reverse the shift from desirable to undesirable native plant communities.

Under Alternative 4, limits to the season of grazing use and the stocking rate would allow cool-season bunchgrass species to regain health and vigor, and therefore significant progress would be made toward meeting Standard 4 and ORMP objective to improve vegetation health and condition. These improvements in vegetation conditions would be more rapid under Alternative 4 than under Alternative 3 because total livestock numbers would be limited, total AUMs would be decreased by 13 percent, and grazing during the active growth period would only occur once in each three-year period. However, recent sage-grouse habitat assessment data reflect prevalence of cheatgrass on the Alder Creek FFR allotment. In some areas, cheatgrass is the dominant understory component. Due to the competitive nature of cheatgrass, it is unlikely that deep-rooted perennial bunchgrasses will increase substantially in areas where cheatgrass is now the dominant herbaceous component.

Issue 2: Improve watershed conditions within upland sites.

Alternative 4 would defer grazing until fall in 2 of 3 years, avoiding physical impacts to soils during the wettest and most susceptible period. Additional benefits are provided from reduced critical growing season use and riparian grazing that promotes the ability of native plant communities to

2013. The NEPA process for the Owyhee 68 consists of five EAs and an EIS. 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 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 the efforts of BLM and the ranch 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, some are severely impaired from historical use. As Field Manager for the Owyhees, I have a steward's responsibility to further the health and resilience of this landscape. Adding to these considerations, we live in a time of uncertainty. Climate change presents an uncertainty whose impacts we cannot clearly discern. Nonetheless, as stewards of the land, 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 soon 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, defined as healthy, sustainable resource conditions and predictability for ranch operators.

improve and respond with increased soil cover, decreased bare ground, and reduced susceptibility to accelerated erosion, and lessen concentrated use on upland soils that surround riparian areas.

In addition, stocking rates would be reduced by 13 percent to protect resource values and livestock numbers would be limited, removing the flexibility that allowed the addition of an unidentified number of livestock over a shorter amount of time. This would reduce the physical impacts of trampling, compaction, and pugging to soils that can increase with elevated livestock numbers. As a whole, Alternative 4 would allow the greatest opportunity for making progress towards maintaining, meeting and improving soil and hydrologic function over the life of the permit compared to Alternatives 1, 2, and 3, though not as rapid as Alternative 5.

Issue 3: Limit juniper encroachment into shrub-steppe vegetation types.

Vegetation treatments to limit juniper encroachment on the Alder Creek FFR allotment are outside of the scope of the current grazing permit renewal action. Juniper control is not consistent with the purpose and need identified in the EA to renew grazing permits. Juniper control may be addressed through separate NEPA analysis specific to proposed project(s), because implementation of actions identified in the permit renewal application is not dependent on the control of juniper.

Juniper encroachment can decrease the shrub, grass, and forb cover and forage that shrub steppe dependent wildlife species rely on for survival and reproduction. Juniper also increases perching sites for raptors and ravens that prey on shrub steppe dependent wildlife species. Juniper is an important source of food and cover for many wildlife species (including mule deer, elk, and many migratory birds). Sage-grouse avoid areas with juniper encroachment. To the extent that juniper encroachment on the Alder Creek FFR allotment is limiting watershed and upland vegetation condition, those effects will continue to occur until such time that vegetation treatments can be designed, analyzed and implemented in a separate, future process.

Issue 4: Prevent introduction and spread of noxious and invasive annual species (e.g., cheatgrass).

Although Alternative 5 would most greatly reduce the potential for livestock to introduce and spread invasive and non-native annual species compared to the other alternatives, 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 even in the absence of livestock grazing in the allotment. Improvements in the health and vigor of native plant communities as a result of modified grazing practices would reduce the competitive ability of noxious and invasive species on the Alder Creek FFR allotment. However, recent sage-grouse habitat assessment data reflect the current prevalence of cheatgrass on the Alder Creek FFR allotment. In some areas, cheatgrass is the dominant understory component. Due to the competitive nature of cheatgrass, encroachment of this annual grass into the sagebrush community will continue, limiting progress towards site potential, especially in the lower-elevation portions of the allotment.

Issue 5: Improve riparian vegetation and stream-bank stability associated with streams and springs/seeps.

Under Alternative 4, the Alder Creek FFR allotment would be managed with a defined schedule that would incorporate 2 years of growing season deferment over the course of a 3-year rotation and reduce authorized grazing by 13 percent. Grazing would not occur during the hot season in any year, when livestock make disproportionate use of riparian areas and riparian vegetation. Limiting spring use to one in three years would promote recovery of riparian vegetation health, while establishment of a maximum allowable number of livestock would limit the potential for concentrated use of riparian areas. Therefore, the allotment would make significant progress towards meeting the riparian-wetland related Standards and ORMP objectives under this alternative. While Alternative 3 would also result in significant progress, progress would not be as rapid as under Alternative 4 because livestock numbers would be at the permittee's discretion, and grazing would only be deferred 1 in 3 years.

Issue 6: Improve wildlife habitats, and habitats necessary to meet objectives for sagebrush-dependent species, including sage-grouse.

Upland and sage-grouse habitat

As described under Issue 1, the vigor and reproductive capability of deep-rooted perennial grasses and forbs would improve, and over time abundance of these desirable species would increase as a result of the proposed changes to livestock management on the Alder Creek FFR allotment. Increases in cover and forage from deep-rooted perennial grasses and forbs would improve sage-grouse nesting and brood rearing habitat, as well as general habitat for other sagebrush-dependent upland wildlife species.

Riparian habitat

As described under Issue 5, riparian areas currently not meeting standards would make significant progress under Alternative 4. Healthy, vigorous riparian plant communities exemplified by a diversity of woody and herbaceous hydric species, are expected to stabilize streambanks and provide shading, invertebrate prey habitat and stream channel characteristics appropriate to stream morphology, resulting in suitable aquatic wildlife habitat.

Issue 7: Consider whether grazing can be used to limit wildfire.

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 the Toy Mountain Group 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 Alder Creek FFR 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.

Alternative 4 retains 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.

Issue 8: Consider the issue of climate change and its relationship to the proposed federal action of renewing grazing permits. 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.

Climate change is another factor I considered in building my decision around Alternative 4 for the Alder Creek FFR allotment. Climate change is a stressor that can reduce the long-term competitive advantage of native perennial plant species. Since livestock management practices can also stress sensitive perennial species in arid sagebrush steppe environments, I considered the issues together—albeit based on the limited information available on how they relate in actual range conditions. Although the factors that contribute to climate change are complex, long-term, and not fully understood, the opportunity to provide resistance and resilience within native perennial vegetation communities from livestock grazing induced impacts is within the scope of this decision. Alder Creek FFR allotment is currently not meeting Standards 1, 2, 3, 4 and 8 due to current livestock management; Alternative 4 combines season, intensity, and duration of livestock use to promote long-term plant health and vigor. Assuming that climate change affects the arid landscapes in the long-term, the native plant communities on this allotment will be better armed to survive such changes. The native plant health and vigor protected under this alternative will provide resistance and resilience to additional stressors, including climate change.

Issue 9: Consider impacts to regional socioeconomic activity generated by livestock production.

During the scoping process, concerns were raised about the impacts of modifications to or reductions in grazing to regional socio-economic activity. I share this concern and have taken this into consideration in making my decision; however, my primary obligation is to ensure that the new grazing permit protects resources in a manner consistent with the BLM's obligations under FLPMA, the Idaho S&Gs and the ORMP. As noted above, I have selected Alternative 4 for the Alder Creek FFR allotment in large part because those selections accomplish those latter goals.

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 on 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 economic opportunities provided by healthy, productive ecosystems and alternate socio-economic resources, such as recreation, that rely on healthy, functional and aesthetically pleasing open spaces and wildlife habitats.

Additional Rationale

I did consider selecting Alternative 5 (No Grazing) for this allotment; 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 allotment. In selecting Alternative 4 for the Alder Creek FFR allotment rather than Alternative 5, I especially considered (1) BLM's ability to meet resource objectives using the selected alternatives, (2) the impact of implementation of Alternative 5 on the your operations and on regional economic activity, and (3) your past performance under previous permits. By implementing Alternative 4, the resource issues identified will be addressed. Declining to authorize grazing for a ten-year period is not the management decision most appropriate at this time in light of these factors.

Finding of No Significant Impact

A finding of no significant impact (FONSI) was signed on November 20, 2013, and concluded that the proposed decision to implement Alternative 4 is not a major federal action that will have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. That finding was based on the context and intensity of impacts organized around the 10 significance criteria described at 40 CFR § 1508.27. Therefore, an environmental impact statement is not required. A copy of the FONSI for EA number DOI-BLM-ID-B030-2013-0021-EA is available on the web at: http://www.blm.gov/id/st/en/prog/nepa_register/owyhee_grazing_group/grazing_permit_renewal1.htm

Conclusion

In conclusion, it is my decision to select Alternative 4 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 this allotment over the next several years. Alternatives 1 and 2 would implement livestock management practices on the Alder Creek FFR allotment that would allow a continued failure to meet objectives and standards. While Alternative 3 would result in progress towards Standards and objectives, progress would be slower than under Alternative 4 because grazing would not be deferred as frequently and livestock numbers would not be limited as they are under Alternative 4. Alternative 5 would limit the economic activity of your livestock operation in 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 Alternative 4 lead me to believe elimination of livestock grazing from the Alder Creek FFR allotment 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 Alder Creek FFR allotment 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 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 persons 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 Solicitor's 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

Works Cited

USDI BLM. (1999). *Owyhee Resource Management Plan*. Marsing, ID.

USDI BLM. (2013). *Final Rangeland Health Assessment for Hart Creek (0532), Box T (0534), and Alder Creek FFR (0639) Allotments, 2013 Supplement*. Marsing, ID.

Copies sent to:

Company	Name		Address	City	ST	Zip	#
Friends of Mustangs	Robert	Amidon	8699 Gantz Ave.	Boise	ID	83709	1
Soil Conservation District	Cindy	Bachman	PO Box 186	Bruneau	ID	83604	2
	Bill	Baker	2432 N. Washington	Emmett	ID	83617-9126	3
	Conrad	Bateman	740 Yakima St.	Vale	OR	97918	4
Idaho Dept. of Agriculture	John	Biar	PO Box 790	Boise	ID	83707	5
Boise District Grazing Board	Stan	Boyd	PO Box 2596	Boise	ID	83701	6
	Gene	Bray	5654 W El Gato Ln.	Meridian	ID	83642	7
Colyer Cattle Co.	Ray & Bonnie	Colyer	31001 Colyer Rd.	Bruneau	ID	83604	8
	Senator Mike	Crapo	251 East Front Street STE 205	Boise	ID	83702	9
Owyhee County Natural Resources Committee	Jim	Desmond	PO Box 38	Murphy	ID	83650	10
Land & Water Fund	William	Eddie	PO Box 1612	Boise	ID	83701	11
Western Watershed Projects	Katie	Fite	PO Box 2863	Boise	ID	83701	12
Gusman Ranch Grazing Association LLC	Forest	Fretwell	27058 Pleasant Valley Rd.	Jordan Valley	OR	97910	13
	Chad	Gibson	16770 Agate Ln.	Wilder	ID	83676	14
Resource Advisory Council	Chair Gene	Gray	2393 Watts Lane	Payette	ID	83661	15
	Russ	Heughins	10370 W Landmark Ct.	Boise	ID	83704	16
Jaca Livestock	Elias	Jaca	817 Blaine Ave.	Nampa	ID	83651	17
Idaho Wild Sheep Foundation	President Jim	Jeffress	PO BOX 8224	Boise	ID	82707	18
	Dan	Jordan	30911 Hwy. 78	Oreana	ID	83650	19
	Floyd	Kelly Breach	9674 Hardtrigger Rd.	Given Springs	ID	83641	20
	Kenny	Kershner	PO Box 300	Jordan Valley	OR	97910	21
	Vernon	Kershner	PO Box 38	Jordan Valley	OR	97910	22
	Lloyd	Knight	PO Box 47	Hammett	ID	83627	23

Company	Name	Address	City	ST	Zip	#	
	Congressman Raul	Labrador	33 E. Broadway Ave STE 251	Meridian	ID	83642	24
The Fund for the Animals, Inc.	Andrea	Lococo	1363 Overbacker	Louisville	KY	40208	25
LU Ranching	Tim	Lowry	PO Box 132	Jordan Valley	OR	97910	26
Idaho Wild Sheep Foundation	Herb	Meyr	570 E 16th N.	Mountain Home	ID	83647	27
R&S Enterprise	Ray	Mitchell	265 Millard Rd.	Shoshone	ID	83352	28
	Ed	Moser	22901 N. Lansing Ln.	Middleton	ID	83644	29
	Brett	Nelson	9127 W. Preece St.	Boise	ID	83704	30
	Ramona	Pascoe	PO Box 126	Jordan Valley	OR	97910	31
	Anthony & Brenda	Richards	8935 Whiskey Mtn. Rd.	Murphy	ID	83650	32
-	John	Richards	8933 State Hwy. 78	Marsing	ID	83639	33
	Senator James E.	Risch	350 N 9th Street STE 302	Boise	ID	83702	34
Idaho Conservation League	John	Robison	PO Box 844	Boise	ID	83701	35
	John	Romero	17000 2X Ranch Rd.	Murphy	ID	83650	36
	Bob	Salter	6109 N. River Glenn	Garden City	ID	83714	37
Intermountain Range Consultants	Bob	Schweigert	5700 Dimick Ln.	Winnemucca	NV	89445	38
	Congressman Mike	Simpson	802 West Bannock STE 600	Boise	ID	83702	39
Shoshone-Bannock Tribes	Tribal Chair Nathan	Small	PO Box 306	Ft. Hall	ID	83203	40
Juniper Mtn. Grazing Association	Michael	Stanford	3581 Cliffs Rd.	Jordan Valley	OR	97910	41
	John	Townsend	8306 Road 3.2 NE	Moses Lake	WA	98837	42
Moore Smith Buxton & Turcke	Paul	Turcke	950 W. Bannock, Ste. 520	Boise	ID	83702	43
Natural Resources Defence Council	Johanna	Wald	111 Sutter St., 20 th Floor	San Francisco	CA	94104	44
Office of Species Conservation	Cally	Younger	304 N. 8 th STE 149	Boise	ID	83702	45
Owyhee County Commissioners			PO Box 128	Murphy	ID	83650	46
Holland & Hart LLP			PO Box 2527	Boise	ID	83701	47
Idaho Cattle Association			PO Box 15397	Boise	ID	83715	48
IDEQ			1410 N. Hilton	Boise	ID	83701	49
Idaho Dept. of Lands			PO Box 83720	Boise	ID	83720	50

Company	Name		Address	City	ST	Zip	#
Idaho Farm Bureau Fed.			PO Box 167	Boise	ID	83701	51
International Society for the Protection of Horses & Burros	Karen	Sussman	PO Box 55	Lantry	SD	57636	52
Oregon Division State Lands			1645 NE Forbes Rd., Ste. 112	Bend	OR	97701	53
Owyhee Cattlemen's Association			PO Box 400	Marsing	ID	83639	54
Schroeder & Lezamiz Law Offices			PO Box 267	Boise	ID	83701	55
Sierra Club			PO Box 552	Boise	ID	83701	56
State Historic Preservation Office			210 Main St.	Boise	ID	83702	57
State of Nevada Div. of Wildlife			60 Youth Center Rd.	Elko	NV	89801	58
The Nature Conservancy			950 W. Bannock, Ste. 210	Boise	ID	83702	59
The Wilderness Society			950 W. Bannock St., Ste. 605	Boise	ID	83702-5999	60
U.S.F.W.S. Idaho State Office			1387 S. Vinnell Way, Ste. 368	Boise	ID	83709	61
USDA Farm Services			9173 W. Barnes	Boise	ID	83704	62
Western Watershed Projects			PO Box 1770	Hailey	ID	83333	63
Josephine Ranch	Steve	Boren	1050 N. Briar Lane	Bosie	ID	83712	64
	John E	Edwards	15804 Tyson Rd	Murphy	ID	83650	65
Northwest Farm Credit Services, FLCA	Maudi	Hernandez	16034 Equine Drive	Nampa	ID	83687	66
	Rohl	Hipwell	18125 Oreana Loop Rd.	Oreana	ID	83650	67
	Marti & Susan	Jaca	21127 Upper Reynolds Cr. Rd.	Murphy	ID	83650	68
Lequerica & Sons Inc.	Tim	Lequerica	PO Box 113	Arock	OR	97902	69
	Charles	Lyons	11408 Hwy 20	Mountain Home	ID	83647	70
	Craig & Georgene	Moore	P.O. Box 14	Melba	ID	83641	71
	Soctt & Sherri	Nicholson	P.O. Box 690	Meridian	ID	83680	72
	Joseph	Parkinson	123 W. Highland View Dr.	Boise	ID	83702	73
Zion First National Bank	Bertha	Scallon	500 5th St.	Ames	IA	50010	74
	Elmer	Stahl	17965 Oreana Loop Rd.	Murphy	ID	83650	75

Company	Name		Address	City	ST	Zip	#
Estate of Charles Steiner	John	Steiner	24597 Collett Rd.	Oreana	ID	83650	76
	Robert	Thomas	17947 Shortcut Rd.	Oreana	ID	83650	77
Idaho Fish & Game	Rick	Ward	3101 S. Powerline Rd.	Nampa	ID	83686	78
Northwest Farm Credit Services			815 N. College Rd	Twin Falls	ID	83303	79
Ranges West			2410 Little Weiser Rd.	Indian Valley	ID	83632	80