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BUREAU OF LAND MANAGEMENT

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In Reply Refer To:
4160 ID130

November 26, 2013

REGISTERED MAIL

Scott and Sherri Nicholson
PO Box 690
Meridian, ID 83680

Notice of Field Manager's Proposed Decision

Dear Scott and Sherri Nicholson:

Thank you for working with the BLM throughout this 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.

The BLM completed a Rangeland Health Assessment/Evaluation and Determination for the Garrett FFR allotment in 2013 (USDI BLM, 2013) by supplementing the initial allotment review initiated in 2006.¹ The BLM undertook this effort to ensure that any renewed grazing permit on this allotment is consistent with the BLM's legal and land management obligations. This proposed decision incorporates those documents by reference and the information contained therein.

On January 11, 2013, the Owyhee Field Office initiated by letter the collective public scoping process for Groups 3 through 5 of the Owyhee 68 grazing permit renewal process. These groups are referred to as the Toy Mountain, South Mountain, and Morgan groups, respectively. The West Castle allotment is one of 20 allotments within Group 3, the Toy Mountain Group. The letter informed recipients that the purpose of the public outreach effort was to identify resource and management issues associated with the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (Idaho S&Gs) and the Owyhee Resource Management Plan (ORMP) for the purpose of developing grazing management alternatives for all three groups, including for the Toy Mountain Group NEPA document. The letter also served to request additional resources and monitoring information that could help the BLM to complete the permit renewal process. The letter encouraged commenters to submit comments and information by

¹ Rangeland health assessments for the Toy Mountain Group allotment are available on the web at http://www.blm.gov/id/st/en/prog/nepa_register/owyhee_grazing_group/grazing_permit_renewal1.html

February 25, 2013, for each group of allotments, but did not set a closing date for the receipt of public comments. The scoping document was also presented to the Shoshone-Paiute Tribe and Owyhee County Commissioners.

BLM mailed you a letter on May 25, 2011, summarizing progress and future actions to comply with the 2008 Stipulated Settlement Agreement in renewing your grazing permit. That letter also requested that you complete an application for renewal of your permit to graze livestock in the Garrett FFR allotment. You submitted an application for renewal of this grazing permit, received by the BLM on June 12, 2011. In late May and early June 2013, two meetings were held with you to discuss allotment conditions, objectives, and livestock management. Additionally, you were asked during the 2013 meetings to update the previously submitted application. Following discussion with the BLM in 2013, you provided an updated application for permit renewal, received by the BLM on June 13, 2013.

After evaluating conditions on the land, meeting with you, and reviewing information received from the public, it became clear that resource concerns currently exist on the Garrett FFR allotment.

With a focus on addressing the impacts of renewing your livestock grazing permit, my office prepared and issued the Toy Mountain Group Environmental Assessment² (EA) in which we considered a number of options and approaches to maintain and improve resource conditions within the 20 allotments of the Toy Mountain Group. Specifically, the BLM considered and analyzed in detail five alternatives. We also considered other alternatives that we did not analyze in detail. Our objective 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 Garrett FFR allotment's natural resources conform to the goals and objectives of the ORMP and the Idaho S&Gs. This proposed decision incorporates by reference the analysis contained in the EA.

I am now prepared to issue a proposed decision to renew your permit to graze livestock within the Garrett FFR allotment. Upon implementation of the decision, your permit to graze livestock on this allotment will be fully processed using the revisions to the grazing regulations promulgated³ in 1995, the Idaho S&Gs adopted in 1997, and the ORMP adopted in 1999.

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 Garrett FFR allotment;
- Outline my proposed decision to select Alternative 3; and
- Explain the reasons for making this decision.

² EA number DOI-BLM-ID-B030-2013-0021-EA analyzed five alternatives for livestock grazing management practices to fully process permit renewal within the Toy Mountain Group of allotments.

³ 43 CFR Subpart 4100 is the federal regulations that govern public land grazing administration.

Background

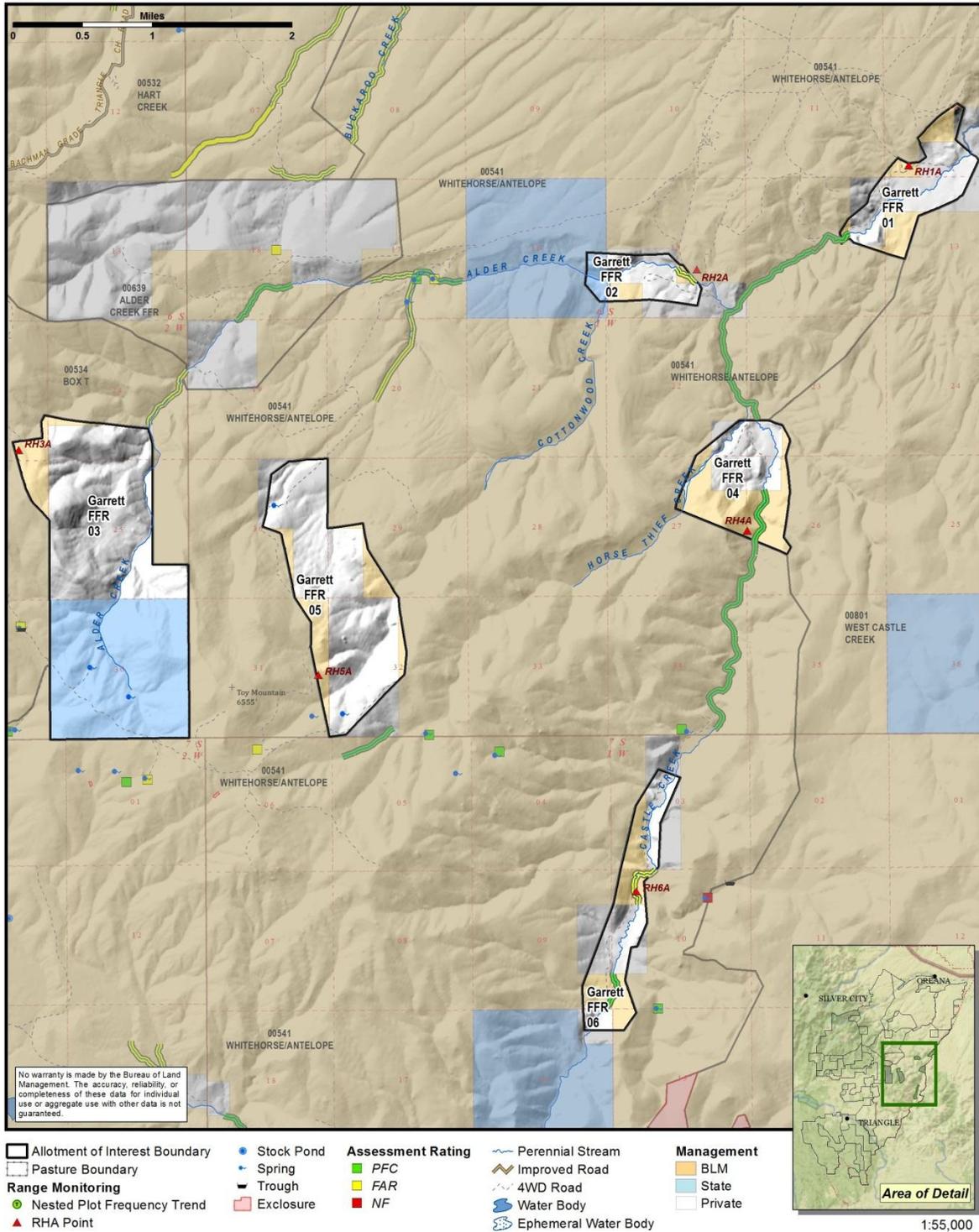
Allotment Setting

The Garrett FFR allotment is composed of six separate parcels located approximately 8 miles south of Oreana, Idaho, and each parcel is associated with private land (Map 1). The ORMP categorized the Garrett FFR allotment as an Improve (I) category allotment with a low priority for management. In addition to allocating livestock grazing within the Garrett FFR allotment, the ORMP identified issues associated with management activities, with a listing of resource concerns and applicable ORMP resource objectives. Resource concerns identified include the high erosion potential, ecological condition of vegetation communities, noxious weeds, perennial surface water, riparian/wetland ecosystems, and special status species (redband trout).

The elevation of the Garrett FFR allotment ranges from 3,300 feet to 6,400 feet. The allotment lies within the Snake River Plains and Owyhee Uplands, a sagebrush steppe semi-arid landscape of shrubs and cool-season bunchgrasses where native vegetation communities are diverse. Limited precipitation with cold winters and dry summers constrains plant and animal communities. Primary vegetation types are dominated by big sagebrush, low sagebrush, or salt desert shrub as the shrub layer, with native perennial bunchgrasses and forbs in the understories.



Map 1: Garrett FFR (00626) Allotment



Current Grazing Authorization

One existing grazing permit authorizes livestock grazing use of the Garrett FFR allotment with a current total permitted use of 31 AUMs, all of which are active use and none are suspension AUMs. The terms and conditions of the existing grazing permit are as follow in Table LVST-1:

Table LVST-1: Mandatory and other terms and conditions of the existing permit to graze livestock within the Garrett FFR allotment

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00626 Garrett FFR	30	Cattle	12/1	12/31	100	Active	31

Terms and conditions:

1. The number of livestock and season of use on the fenced federal range (FFR) allotment #0626 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 exclosures 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.

Actual use annually submitted by you for the Garrett FFR allotment in recent years most often identifies dates of use and livestock numbers in this allotment that reflect use between December 1 and December 31 with 30 head of cattle, replicating dates and numbers on the permit.⁴

Actual use is important when considering the renewal of a grazing permit, because it was actual use and not authorized levels of use that resulted in current conditions on the allotment. In other words, the current condition of the allotment is not the result of what was authorized under the current permit, but rather is the result of the removal a varied number of AUMs and seasons of use over the past several years.

Resource Conditions

The BLM evaluated grazing practices and conditions in the Garrett FFR allotment through 2013. The determination document for the allotment was provided to the public with the preliminary EA. The Evaluation and Determination documents concluded that applicable Standards were either met or significant progress toward meeting standards was being made. Specifically, Standards 2 (Riparian Areas and Wetlands) and 3 (Stream Channel/Floodplain) of the Idaho S&Gs are not being met in the Garrett FFR allotment, but current livestock management practices conform with the Guidelines and significant progress has been made. Standards 1 (Watersheds), 4 (Native Plant Communities), 7 (Water Quality), and 8 (Threatened and Endangered Plants and Animals) are met. Standards 5 (Seedings) and 6 (Exotic Plant Communities, other than Seedings) are not applicable to resources present within the allotment.

Vegetation - Uplands

The Idaho S&Gs Standard 4 (Native Plant Communities) is met in the six pastures that make up the Garrett FFR allotment. Public land upland vegetation communities within the six pastures of the Garrett allotment are primarily the slopes and benches associated with private land in valley bottoms. As noted in the 2006 findings of the Initial Allotment Review, six rangeland health evaluations were completed on the allotment in 2002. Sites had a none-to-slight to moderate-to-

⁴ Garrett FFR allotment includes 3,148 acres in six separate parcels, of which only 21 percent is public land

extreme departure from reference site conditions for their respective ecological site types. However, the latter rating was due to the presence of invasive plants (cheatgrass) and western juniper encroachment. The overall departure of biotic integrity from reference site conditions at the six assessment sites was rated none-to-slight or slight-to-moderate.

Recent reported annual grazing use of the Garrett FFR allotment that extends through early winter, a period of limited impact to upland vegetation communities, is consistent with the finding that Standard 4 is met.

Although juniper trees are noted in the 2002 assessment and present within associated photos for pasture 3 and in 2011 GIS NAIP imagery (USDA FSA, 2011), their presence on the landscape is limited to ridges and some draws and is not so widespread as to limit the vegetation community as a whole from providing proper nutrient cycling, hydrologic cycling, or energy flow.

To summarize, the Garrett FFR allotment is meeting Standard 4, although with increasing juniper encroachment into vegetation communities that should not include juniper in excess of a few scattered trees in any of the reference site conditions. No data for trend are available, but consistent late-fall and early winter grazing use is conducive toward maintaining and improving native bunchgrass health and vigor and meeting the ORMP vegetation objective to improve unsatisfactory vegetation health/condition in the Garrett FFR allotment.⁵

Watersheds

Watershed indicators show little departure from expected conditions for the ecological site in pastures 2, 3, 4, and 5. Areas in pasture 1 contain increased water flow patterns, although all other soil and hydrologic function-related indicators vary between none-to-slight and slight-to-moderate.

Overall, the pastures contain stable soils that display historic and some active impacts, although abundant gravel, adequate litter, and plant diversity are in place to decrease erosion potential. While the biotic function is reduced in localized areas of pastures 4 and 5 due to an increase in cheatgrass and western juniper, soil and hydrologic indicators show that watershed function still maintains proper nutrient and hydrologic cycling and energy flow. Current livestock management is compatible with attainment of Standard 1 for the Garrett FFR allotment.⁶

Water Resources and Riparian/Wetland Areas

The Garrett FFR allotment is not meeting Standards 2 and 3, but pastures 2 and 6 are making significant progress toward meeting the Standards. The Standards are being met in pasture 4 and are not applicable in pastures 1, 3, and 5. The named streams that occur on BLM lands in pastures 2, 4, and 6 are Alder, Castle, and Horse Thief Creeks. A short reach of Alder Creek was rated functional-at risk (FAR) in 2000, but appeared to be in proper functioning condition (PFC) in 2011. Although there is a private water right and a road affecting the stream, the vegetation was vigorous, the banks were well-protected and stable, and both fish and beaver were present. Three

⁵ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.1, Section 3.3.6.1.1, and Appendix E.

⁶ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.2 and Section 3.3.6.1.2.

short reaches of Castle Creek occur on BLM lands in pastures 4 and 6; the reach in pasture 4 and one of the reaches in pasture 6 was in PFC in 1999 and appeared in PFC again in 2011; the second reach in pasture 6 was rated FAR in 1999, but appeared to be in PFC in 2011. Horse Thief Creek traverses pasture 4, and it was visited in 2011. An assessment was not conducted, but the stream appeared to be in PFC. The stream is geologically confined and well-protected with rock and willows.⁷

Special Status Plants

There is one special status plant species that occurs within the Garrett FFR allotment, Simpson's hedgehog cactus. The occurrence of this special status plant is meeting Standard 8. The Rangeland Health Assessments contain additional detail related to the condition of special status plants, as originally compiled in 2006 and supplemented in 2013.⁸

Wildlife/Wildlife Habitats and Special Status Animals

The Garrett FFR allotment consists of six pastures, is dominated by sagebrush steppe habitat, and is used by sage-grouse during the breeding summer and winter seasons. Upland plant communities and riparian habitats within preliminary priority habitats (PPH) were found to be not limiting for breeding, summer, or winter use.⁹

Guidelines for Livestock Grazing Management

Guidelines for livestock management within the Idaho S&Gs are not applicable to assessments of meeting standards, because applicable standards were either met or significant progress toward meeting standards was made.

Issues

Through the scoping process and development of the Rangeland Health Assessment/Evaluation Reports and Determinations, the BLM interdisciplinary team identified the following issues concerning livestock grazing management in one or more of the Toy Mountain Group allotments:

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.*¹⁰

⁷ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.3 and Section 3.3.6.1.3.

⁸ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.4 and Section 3.3.6.1.4.

⁹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.5 and Section 3.3.6.1.5.

¹⁰ Juniper encroachment is not an issue within the Garrett FFR allotment, with only scattered juniper and limited dominance recorded in the 2002 rangeland health assessments.

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: *Protect special status plants and improve the habitats supporting special status plants.*

Issue 7: *Improve wildlife habitats, and habitats necessary to meet objectives for sagebrush-dependent species, including sage-grouse.*

Issue 8: *Consider whether grazing can be used to limit wildfire.*

Issue 9: *Consider the two-fold 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 10: *Consider impacts to regional socioeconomic activity generated by livestock production.*

Analysis of Alternative Actions

Based on the current condition of the Garrett FFR allotment and the issues identified above, the BLM considered and analyzed a number of alternative livestock management schemes in the EA to ensure that any renewed grazing permit would result in the maintenance or improvement of conditions on the allotment. Specifically, the BLM analyzed five alternatives in detail, identified a number of actions common to all alternatives, and considered but did not analyze in detail a number of other possible actions.¹¹ The BLM considered the following alternatives in detail:

Alternative 1 - Current Situation

The BLM would renew the livestock grazing permit for use in the Garrett FFR allotment consistent with the summarized actions that have led to the current conditions. The same terms and conditions of the existing permit would be included in the permit offered. The number of livestock and season of use on the Garrett FFR allotment, an allotment that includes a high percentage of private land, would be unchanged from the existing permit and at the discretion of the permittee. Permitted use in the Garrett FFR allotment would be unchanged from the existing permit with 31 AUMs of active authorized use and 0 suspension AUMs.¹²

¹¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 2 and Section 2.4.6.

¹² For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.6.1

Alternative 2 - Applicant's Proposed Action

The BLM would renew the livestock grazing permit for use in the Garrett FFR allotment in accordance with terms and conditions of the existing permit and as modified by the application received by BLM. The number of livestock and season of use on the Garrett FFR allotment would be at the discretion of the permittee. Permitted use in the Garrett FFR allotment would be unchanged from the existing permit with 31 AUMs authorized active use and 0 AUMs suspension.¹³

Alternative 3

The BLM would renew the livestock grazing permit for use in the Garrett FFR allotment with terms and conditions that constrain seasons, intensities, duration, and frequency of grazing use consistent with pasture-specific constraints. While seasons of grazing use would be constrained, livestock numbers would be defined at the permittee's discretion. Permitted use in the Garrett FFR allotment would be unchanged from the existing permit with 31 AUMs authorized active use and 0 AUMs suspension.¹⁴

Alternative 4

The BLM would renew the livestock grazing permit for use in the Garrett FFR allotment with terms and conditions that constrain seasons, intensities, duration, and frequency of grazing use consistent with the pasture-specific constraints that would be more limiting than those under Alternative 3. In addition to defining seasons of authorized use, livestock numbers authorized within the allotment would be defined. Permitted use in the Garrett FFR allotment would be unchanged from the existing permit with 31 AUMs authorized active use and 0 AUMs suspension.¹⁵

Alternative 5 - No Grazing

No grazing would be authorized on public lands within the allotment for a term of 10 years. The application for grazing permit renewal would be denied and no grazing permit would be offered.

The Preliminary EA detailing the above alternatives was made available for public review and comment for a 15-day period ending November 12, 2013. Comments that were received were used to complete the EA and draft a FONSI.

Proposed Decision

After considering the current grazing practices, the current conditions of the natural resources, and the alternatives and analysis in the EA, comments received from you and other interested publics, as well as other information, it is my proposed decision to renew your grazing permit for 10 years consistent with the terms and conditions under Alternative 3. Implementation of Alternative 3 over the next 10 years will allow the Garrett FFR allotment to continue meeting or making

¹³ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.6.2

¹⁴ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.6.3

¹⁵ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.6.4

significant progress toward meeting the Idaho S&Gs, while also moving toward achieving the resource objectives outlined in the ORMP. Specifically, Alternative 3 will allow progress to be made toward meeting Standards 2 and 3.

You will be offered a permit for a term of 10 years with an active use of 31 AUMs as outlined in Table LVST-2. Authorized active use in the Garrett FFR allotment will be unchanged from the existing permit.

Table LVST-2: Permitted grazing use within the Garret allotment with implementation of the decision

Active Use	Suspension	Permitted Use
31 AUMs	0 AUMs	31 AUMs

The terms and conditions of the renewed grazing permit are defined in Table LVST-3.

Table LVST-3: Mandatory and other terms and conditions of the offered permit to graze livestock within the Garrett FFR allotment with implementation of the decision

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00626 Garrett FFR	3	Cattle	4/1	12/15	100	Active	31

The following grazing permit terms and conditions specific to the Garrett FFR allotment would be included in the permit offered:

1. Dates of availability of the pastures of the Garrett FFR allotment (0626), utilization limits within upland vegetation communities following use during the active growing season, and limits to the intensity of grazing use within riparian areas 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. The number of livestock authorized on the Garratt FFR allotment (0626) is at the permittee's discretion, as long as authorized active use of 31 AUMs from public lands is not exceeded.
3. A crossing permit for trailing of livestock associated with the grazing authorization in the Garrett 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 trailing permit or similar authorization may be required prior to crossing 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 grazing schedule for the Garrett FFR allotment, identified in Table LVST-4, will be authorized and its implementation will be included as a term and condition of the permit offered. Livestock numbers authorized to graze within the allotment are at your discretion, so long as 31 AUMs of authorized active AUMs are not exceeded from the public land portions of the allotment.

Table LVST-4: Garrett FFR allotment grazing schedule (dates when grazing can occur) with implementation of the decision

Pasture	Year 1	Year 2	Year 3
1	4/1 to 12/15 *	4/1 to 12/15 *	7/1 to 12/15
2	4/1 to 12/15 * **	4/1 to 12/15 * **	10/1 to 12/15
3	4/1 to 12/15 *	4/1 to 12/15 *	7/16 to 12/15
4	10/1 to 12/15	4/1 to 12/15 * **	4/1 to 12/15 * **
5	7/16 to 12/15	4/1 to 12/15 *	4/1 to 12/15 *
6	4/1 to 12/15 * **	10/1 to 12/15	4/1 to 12/15 * **

* Upland utilization limit not to exceed 20 percent at the end of the active growing season (7/15)

** Riparian intensity of use limited to stubble height no less than 6 inches, woody browse use no greater than 30 percent incidence of use on most recent year's lead growth, and bank alteration no greater than 10 percent at the end of the riparian growing season

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 record as a grazing permit holder for the Garrett FFR, Toy, Whitehorse-Antelope, West Castle, and Browns Creek allotments, and have determined that you have a satisfactory record of performance and are a qualified applicant for the purposes of a 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 3. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will 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 Garrett FFR allotment continuing to meet or make significant progress towards meeting the resource objectives of the ORMP and the Idaho S&Gs.¹⁶

¹⁶ As you know, your allotment is part of a group of 20 allotments forming 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, 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.

Issues Addressed

Earlier in this decision, I outlined the major issues that drove the analysis and decision-making process for the Garret FFR allotment. I want you to know that I considered each alternative in light of the specific issues raised in conjunction with this allotment before I made my decision. My selection of Alternative 3 was in large part because of my understanding that this selection best addressed those issues and especially those pertaining to Standards 2 and 3 regarding riparian and stream channels, as well as Standard 8 regarding wildlife habitats. Selection of Alternative 3 also addresses issues associated with the ORMP management objectives, given the BLM's legal and land management obligations.

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

Under Alternative 3, the season of use would be limited to exclude grazing during the active growing season (5/1 to 6/30 in pastures 1, 2, 4, and 6; 5/1 to 7/15 in pastures 3 and 5) in one of three years. In addition, the intensity of grazing use would be limited to not exceed 20 percent utilization at the end of the active growing season when grazing is authorized between 5/1 and 6/30 or 7/15, as applicable. Limits to the intensity of grazing use during the active growing season and exclusion of use during the active growing season one in three years would allow cool-season bunchgrass species to regain health and vigor, as detailed in Appendix E of the EA. The allotment would continue to meet Standard 4 and the ORMP objective to improve vegetation health and condition.¹⁷

Issue 2: Improve watershed conditions within upland sites.

Alternative 3 would provide deferment from spring grazing in all six pastures in 1 out of 3 years, which would reduce physical impacts to soils during the wettest and most susceptible period. Additional benefits are provided from a minimum of 1 out of 3 years of deferment from critical growing season use for all pastures, which offers native plant communities an opportunity to improve with increased soil cover, decreased bare ground, and reduced susceptibility to accelerated erosion. Alternative 3 also defines grazing periods and would not leave the season of use open, although livestock numbers would continue to be at the permittee's discretion. As a whole, the allotment would continue to meet and further benefit from defined grazing seasons of use. Progress toward maintaining, meeting, and improving soil and hydrologic function proposed with Alternative 3 is therefore expected to be better as compared with Alternatives 1 and 2, though not as rapidly as Alternatives 4 and 5.¹⁸

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

Although the expansion of juniper dominance is an issue within other allotments of the Toy Mountain Group, juniper encroachment is less of an issue within pastures 1, 2, 4, and 6 of the

¹⁷ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.1 and Section 3.3.6.2.3.1

¹⁸ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.2.4 and Section 3.3.6.2.3.2

Garrett FFR allotment because the elevation of public lands within these pastures is generally below 4,700 feet and juniper only occurs as widely scattered trees. Juniper dominance within pastures 3 and 5 is a greater issue than in the other pastures. However, implementation of proper livestock management practices, or the elimination of authorized livestock grazing from the Garrett FFR allotment as would occur under Alternative 5, would not alter fire behavior to a great degree and not reduce juniper encroachment. Similarly, proper grazing management practices would not lead to limiting juniper encroachment into shrub-steppe vegetation types, except when those practices replace repeated heavy grazing use during critical periods of the year and before the fire season.¹⁹

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

In Idaho, the BLM works closely with the Idaho Department of Agriculture, Tribal governments, and county governments to combat noxious weeds. Cooperative weed management arrangements utilize local, state and Federal resources to inventory and treat weed infestations on both public and private lands. Populations are recorded, treated, monitored, and retreated as their presence is known. Identified locations of weeds within the Garrett FFR allotment are limited to two whitetop sites along roads. Undiscovered noxious weeds may also exist. Noxious weed control is ongoing.

Grazing of livestock includes the continued risk of introducing noxious weeds and invasive species to public lands and potential for spread of existing incursions. Although the presence of listed weeds, cheatgrass, and other invasive annual species was identified in the rangeland health assessments, evaluations, and determinations for the Garrett FFR allotment, no location within the allotment was found to be dominated by these species.

Livestock may spread weeds and invasive species through transport on fur and on hoofs, as well as through ingestion and later defecation of viable seeds. Soil disturbance resulting from livestock concentration adjacent to water sources, salting areas, and routes of travel provides sites for establishment of weeds and invasive species. The level of risk associated with implementation of each of the alternatives considered in the EA is proportional to the number of livestock authorized to graze within the allotment and the concentration of soil disturbance. Risks of weed and invasive species introduction and spread would be greater, with significantly higher cattle numbers as vectors of seed movement and as soil disturbance is increased, while those risks associated with authorized livestock grazing would be eliminated in the no-grazing alternative. Alternative 3 will retain the permittee's discretion regarding the number of cattle that graze on all land ownerships in the allotment, while not exceeding authorized active AUMs used on public land. As a result, livestock as a vector of seed dissemination and soils disturbance would be unchanged from the current situation and other alternatives that would authorize livestock grazing to occur, although greater than under Alternative 5.

¹⁹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.3

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

Under current management, the Garrett FFR allotment is not meeting the Standards associated with the riparian-wetland resources, but is making significant progress toward meeting. The allotment would be managed under a defined 3-year schedule that incorporates at least 1 year of deferment from grazing in riparian area during the critical mid-summer period; however, cattle numbers would remain at the discretion of the permittee. Other mandatory terms and conditions of the permit under this alternative would include measures that would reduce impacts (stubble height, woody browse, and bank alteration) associated with the riparian areas condition. Monitoring would be required within pastures 2, 4, and 6 where and when use would occur 2 out of 3 years during mid-summer, and would add assurances that the allotment would make progress toward meeting the Standards.²⁰

Issue 6: Protect special status plants and improve the habitats supporting special status plants.

Alternative 3 would provide periodic deferment from spring grazing, and the allotment would continue to meet standards and ORMP objectives for special status plant species. Alternative 3 is expected to be better for special status plant species compared to Alternatives 1 and 2, but not as beneficial as Alternatives 4 or 5.²¹

Issue 7: Improve wildlife habitats, and habitats necessary to meet objectives for sagebrush-dependent species, including sage-grouse.

Alternative 3 would provide deferment of grazing during the upland growing season from 1 to 3 years in any consecutive 3-year period in all pastures in the allotment. In addition, Alternative 3 would provide deferment of grazing during the mid-summer period from 1 to 2 years in any consecutive 3-year period in pastures with riparian habitats. Upland and riparian utilization and trampling limits also would be implemented in select pastures and years to prevent and mitigate impacts of grazing during the active growing and hot seasons.

Upland habitat

Herbaceous understory conditions would improve with less pressure from livestock grazing in the growing season, and bunchgrasses and perennial forbs would be more vigorous and provide increased forage and cover for upland wildlife species.

Riparian habitat

Under Alternative 3, riparian habitats in the allotment would receive grazing deferment during the mid-summer period 1 year in any consecutive 3-year period, which would result in less use during deferment years. Deferment of mid-summer grazing would allow for increased growth, reproduction, and establishment of riparian vegetation. This would provide increased forage for sage-grouse, cover for spotted frogs, stream shading for redband trout, and vegetation community

²⁰ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.3 and Section 3.3.6.2.3.3

²¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.4 and Section 3.3.6.2.3.4

diversity for all riparian-dependent wildlife species. Improvements in riparian conditions also would occur during years with mid-summer use because additional utilization, stubble height, and bank alteration limits would prevent overutilization and degradation of riparian habitats. Deferment of mid-summer grazing in combination with intensity limitation terms and conditions would ensure that this allotment continues to meet Standard 8.

Sage-grouse habitat

Forbs would receive less grazing pressure and, in deferment years, would not be grazed during their active growing season. This would allow them to increase in vigor and reproductive capability. Perennial grasses would increase in vigor, which would result in increased height. Increased cover for sage-grouse would reduce predation on individuals and nests.

This allotment would continue to meet Standard 8 under Alternative 3.²²

Issue 8: 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 graze livestock at the landscape scale to reduce fire behavior or use targeted grazing to create fuel breaks on the Toy Mountain Group allotments with the intention that livestock grazing 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 3 for the Garrett FFR allotment will not significantly alter fire behavior during extreme conditions or the BLM's ability to fight wildfire in the area.

Wildfire behavior is dependent on a number of factors, including climatic conditions and current weather, as well as the size and connectivity of fuels, fuel loading, fuel moisture, and topographic slope. Although landscape-scale livestock grazing has the potential to reduce fine fuels to a degree, fire intensity and spread in sagebrush steppe and salt desert shrub vegetation communities during periods of extreme fire behavior through mid-summer would be little altered in the absence of heavy livestock grazing prior to the fire season. At the same time, the period when grazing could reduce fine fuels prior to the fire season is also the season of active growth of native perennial bunchgrass species. Annual heavy livestock grazing during the active growing season to reduce fine fuels would not be consistent with maintaining or improving native perennial herbaceous species health and condition, as summarized in Appendix E of the EA. The BLM's current permit renewal process is focused on improving native upland and riparian plant communities, and landscape-scale grazing to reduce fine fuels to a level or at a time necessary to control fire behavior would not support that improvement.

While targeted grazing may have potential application to develop and maintain strategic fire breaks, its application needs to be considered in combination with other fuels management tools. In addition, targeted grazing to create fire breaks would alter the role of permit renewal. Grazing authorized by permit renewal would provide authorization to use public land resources, while fuels management changes the objective to manipulate vegetation attributes. Targeted grazing to

²² For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.5 and Section 3.3.6.2.3.5

establish fuel breaks, as well as landscape-scale grazing to reduce fuels, are outside the purpose and need of the EA that analyzes the consequences of implementing livestock management practices identified in the application received and alternatives for grazing permit renewal authorizing cattle grazing to meet rangeland health standards and resource management objectives.²³

Issue 9: Consider the two-fold 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 3 for the Garrett FFR allotment. Climate change does not have a clear cause-and-effect relationship with the applicant's proposed action or alternatives. It is currently beyond the scope of existing science to identify a specific source of greenhouse gas emissions or sequestration and designate it as the cause of specific climate or resource impacts at a specific location. Additionally, the proposed action and alternatives, when implemented, would not have a clear, measurable cause-and-effect relationship to climate change because the available science cannot identify a specific source of greenhouse gas emissions such as those from livestock grazing and tie it to a specific amount or type of changes in climate.

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. It is clear that the Garrett FFR allotment is impaired from historic use, and while repair and restoration will only occur in the long term, some change can be anticipated from the proposed limitations to seasons of use. The opportunity to provide resistance and resilience within native perennial vegetation communities is within the scope of this decision. The livestock management actions under Alternative 3 combine seasons, intensities, and durations 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.

Issue 10: Consider impacts to regional socioeconomic activity generated by livestock production.

During the scoping process, concerns were raised about the impacts of modifications or reductions in grazing to 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 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 3 for the Garrett FFR allotment in large part because this selection accomplishes 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

²³ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.3.

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 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.

I have considered the range of issues at the allotment level, including the social and economic impacts that result from modifying grazing authorizations. I have avoided any reduction in grazing use levels in the Toy Mountain Group allotments where current levels are compatible with meeting Rangeland Health Standards and ORMP objectives, as in the Garrett FFR allotment.²⁴

Additional Rationale

BLM put much thought and effort into developing grazing management that is responsive to the Garrett FFR allotment's specific resource needs, geography, and size. These considerations were made to address all concerns and requirements mandated to the BLM. Each allotment of the Toy Mountain Group has different ecology and management capability due to the size and location/topography that result in various issues and priorities. Attempts to coordinate grazing throughout the allotment were made by me and my staff with you and the interested public. I recognize the difficulty of not only providing the mandated needs for the resources, but also the needs and capability that you, the permittee, have. I believe I have balanced those needs of the resource and your capabilities with the information I have to the extent possible.

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 3 for the Garrett FFR allotment, rather than Alternative 5, I especially considered (1) BLM's ability to meet resource objectives using the selected Alternative 3, (2) the impact of implementation of Alternative 5 on your operations and on regional economic activity, (3) the Garrett FFR allotment's susceptibility to significant improvement under Alternative 5, and (4) your past performance under previous permits. By implementing Alternative 3, the resource issues identified will be addressed. Declining to authorize grazing for a 10-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 3 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 ten 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-B030-2013-0022-EA is available on the web at:

http://www.blm.gov/id/st/en/prog/nepa_register/owyhce_grazing_group/grazing_permit_renewal1.html

²⁴ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.8

Conclusion

In conclusion, it is my decision to select Alternative 3 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 the Garrett FFR allotment over the next 10 years. Although Alternatives 1 and 2 would implement livestock management practices on the Garrett FFR allotment that would continue to allow standards to be met or significant progress to be made, Alternative 3 would provide greater assurance that Standard 2 and 3 for riparian related resources, Standard 8 for wildlife habitats, and ORMP management objectives would be met. Alternative 4 would provide a limited additional assurance that resource values would be additionally protected as compared to Alternative 3 and would add unnecessarily to the livestock grazing administrative workload for BLM for this allotment with limited public land.

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 the decision, lead me to believe further reduction or the elimination of livestock grazing from the Garrett 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 Garrett 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 terms 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 meet or continue 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 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 Regional 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

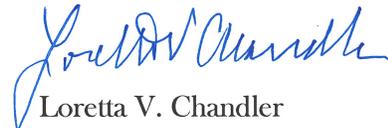
(4) Whether the public interest favors granting the stay.

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

Works Cited

- USDA FSA. (2011, Last modified: August 18). *National Agriculture Imagery Program (NAIP)*. Retrieved from <http://www.fsa.usda.gov/FSA/apfoapp?area=home&subject=prog&topic=nai>
- USDI BLM. (1999). *Owyhee Resource Management Plan*. Marsing, ID.
- USDI BLM. (2013). *Garrett FFR (0626) Initial Allotment and Permit/Lease Review and Rangeland Health Assessment, 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

Company	Name		Address	City	ST	Zip	#
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
	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 Dimnick Ln.	Winnemucca	NV	89445	38
	Congressman Mike	Simpson	802 West Bannock STE 600	Boise	ID	83702	39

Company	Name		Address	City	ST	Zip	#
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
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

Company	Name		Address	City	ST	Zip	#
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
	Scott & 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
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							79
			815 N. College Rd	Twin Falls	ID	83303	
Ranges West			2410 Little Weiser Rd.	Indian Valley	ID	83632	80