



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

Owyhee Field Office
20 First Ave West
Marsing, ID 83639
(208) 896-5912



In Reply Refer To:
4160 ID130

November 26, 2013

REGISTERED MAIL

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 Hart Creek grazing allotment. Thank you also for working with the BLM during the 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 has evaluated grazing practices and conditions in the Hart Creek allotment to ensure that any renewed grazing permit on the allotment is consistent with the BLM's legal and land management obligations. A rangeland health assessment, evaluation and determination were completed in 2006, and subsequently updated in 2013. An evaluation and determination of achieving 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, 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.

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, which include the Hart Creek allotment. You submitted an application for renewal of your permit to graze on the Hart Creek, Box T, Meadow Creek FFR and Alder Creek FFR allotments, which was received by the BLM on May 29, 2013. With respect to the Hart Creek allotment, your application requested a renewed authorization, removing the term and condition for minimum stubble height along Pickett Creek, and reinstating use of 1,014 AUMs that have been in voluntary non-use since 1997 for a total active use level of 2,365 AUMs from March 1 to June 1, annually (the current permit extends until June 15).

With the focus of addressing the impacts of renewing your livestock grazing permit, BLM 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 allotments (NEPA # DOI-BLM-ID-B030-2013-0021-EA). The BLM considered and analyzed in detail five alternatives for the Hart Creek allotment, and also considered other alternatives but did not analyze them in detail for various reasons, as described in the EA. Our 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 Hart Creek allotment's natural resources conform to the goals and objectives of the ORMP and the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (Idaho S&Gs). This proposed decision incorporates by reference the analysis contained in the 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 Hart Creek allotment. This decision is the culmination of a comprehensive review of resource conditions and livestock management in accordance with the grazing regulations, Idaho S&Gs, NEPA, and the Owyhee Resource Management Plan.

This proposed decision will:

- Describe current conditions and issues on the Hart Creek 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 Hart Creek allotment;
- Outline my proposed decision to select Alternative 4 in the Hart Creek allotment; and
- Explain my reasons for making this decision.

Background

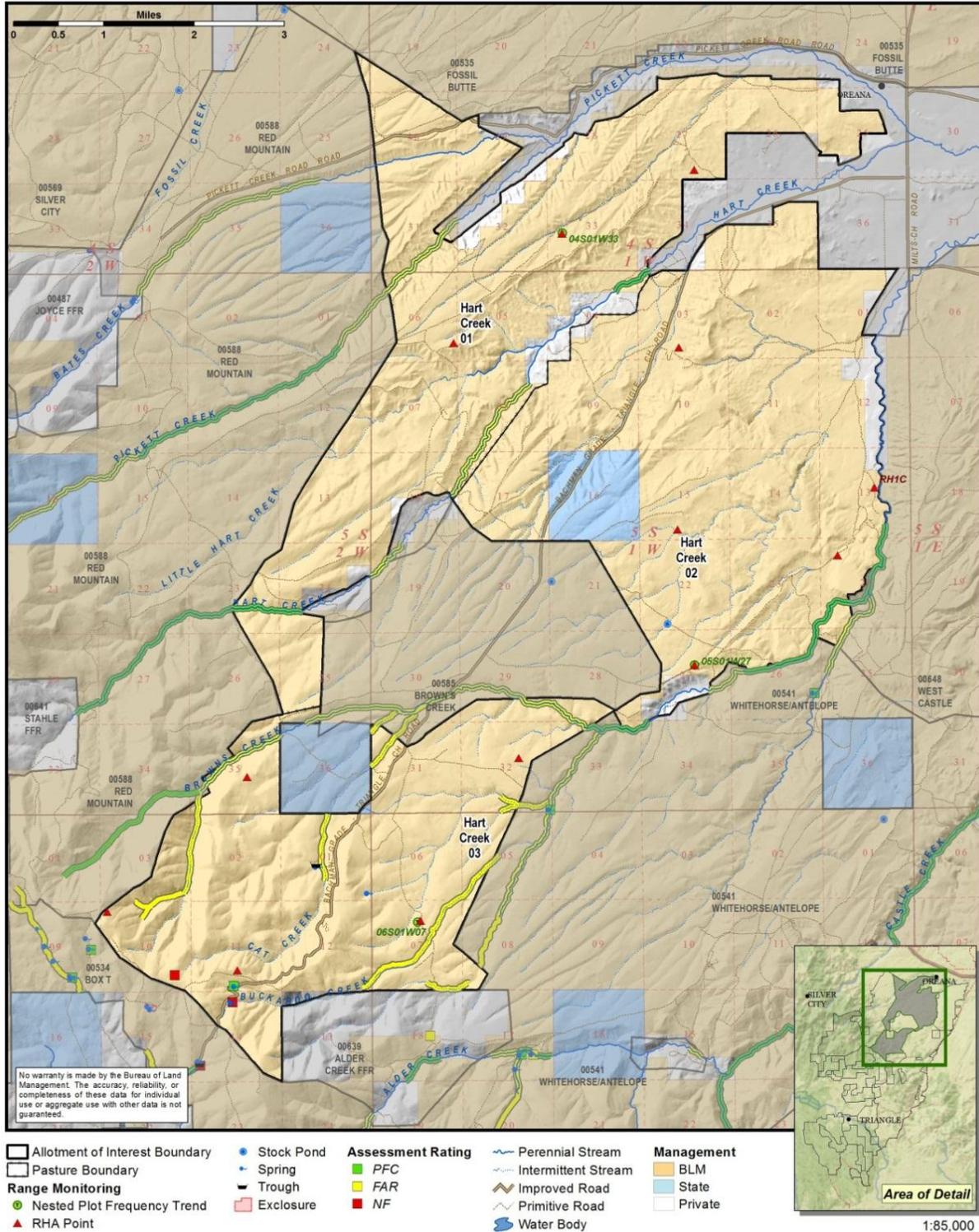
Allotment Setting

The Hart Creek allotment is located about 1 mile southwest of Oreana, Idaho, in Owyhee County. The allotment consists of three pastures encompassing approximately 24,968 acres of public lands, along with 1,078 acres of private lands and 651 acres of state lands (See Map 1). Approximately 50 percent of the allotment area is represented by the Calcareous Loam ecological site, which has expected vegetation of bud sagebrush and shadscale. Much of the remaining area allotment area is represented by loamy and sandy loam sites characterized by Wyoming big sagebrush, and shallow claypan sites characterized by low sagebrush vegetation. The elevations in this allotment range

from around 2,800 to 6,500 feet. Limited precipitation with cold winters and dry summers constrain plant community and wildlife habitat potential. High-value resources in the allotment include important sage-grouse habitat, 2.9 miles of perennial streams occupied by redband trout, as well as many miles of intermittent streams and multiple springs that provide valuable wildlife habitat for sagebrush-steppe species, aquatic species, and migratory birds.



Map 1: Hart Creek (00532) Allotment



Current Grazing Authorization

You hold the sole grazing permit on the Hart Creek allotment, which authorizes livestock grazing use with a current total active use of 2,365 AUMs, of which 1,352 have been available for use over the past 10 years, while the other 1,014 have been in voluntary non-use status, according to a term and condition of your permit. Your permitted use also includes an additional 808 AUMs of suspended use. The authorized season of use for the allotment is March 1 to June 15, annually.

The terms and conditions of your BLM grazing permit are as follows. *

Table LVST-1: Hart Creek allotment current permit

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00532 Hart Creek	851	Cattle	4/1	6/15	97	A	2,065

*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. Minimum 4-inch stubble will be left on herbaceous vegetation within the riparian area along 3.25 miles of Hart Creek and 1.0 miles of Pickett Creek in allotment #0532 at the end of the growing season, as identified in the fisheries objective of the Owyhee RMP.
2. Early use (March 1 to March 31) may be authorized on an annual basis in the Browns Creek and Hart Creek pastures of Hart Creek allotment (#532).
3. Preferred use for the Hart Creek allotment will not exceed 1,351 AUMs each year during the length of this permit.
4. Turnout is subject to the Boise District range readiness criteria.
5. Your certified actual use report is due within 15 days of completing your authorized annual grazing use.
6. Salt and/or supplement shall not be placed within one-quarter (1/4)-mile of springs, streams, meadows, aspen stands, playas, and water developments.
7. Changes to the scheduled use require prior approval.
8. 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.
9. Livestock exclosures located within your grazing allotments are closed to all domestic grazing use.
10. 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.
11. 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.
12. 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.

13. Livestock grazing will be in accordance with your allotment grazing schematic(s). Changes in scheduled pasture use dates will require prior authorization.

14. Utilization may not exceed 50% of the current year's growth.

15. 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

In accordance with an agreement with BLM, you have taken voluntary non-use of 1,014 AUMs on the Hart Creek allotment since 1997 in order to rest pastures 1 and 2 in alternate years to facilitate recovery from historic grazing impacts that existed when you acquired the operation. Pastures 1 and 2 have been used in alternate years between March 1 and April 15, when the cattle are moved to pasture 3, where they may graze as late as June 15.

Resource Conditions¹

A rangeland health assessment, evaluation and determination were completed in 2006, and subsequently updated in 2013. An evaluation and determination of meeting the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (S&Gs) was signed October 21, 2013, taking into consideration the updated rangeland health assessment (USDI BLM, 2013). The findings of the 2013 determination include:

- Standards 1, 2, 3, 4, 7 and 8 are not being met on the Hart Creek allotment.
- Current livestock management practices are significant causal factors in not meeting Standards 2, 3, 7 and 8.
- Current livestock management practices are not significant causal factors in not meeting Standards 1 and 4.
- Standards 5 and 6 are not applicable to this allotment.

The following is a summary of resource conditions on the Hart Creek allotment, including a description of the 2013 determinations for the Standard(s) associated with each resource.

¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA.

Vegetation - Uplands

Based upon soils and ecological site descriptions, expected vegetation in pastures 1 and 2 of the Hart Creek allotment is a mixture of salt-desert shrub and Wyoming big sagebrush communities. The salt-desert shrub sites are characterized by bud sagebrush-shadscale and Indian ricegrass or black greasewood and basin wildrye. The Wyoming big sagebrush sites are characterized by an overstory of Wyoming big sage with an understory of bluebunch wheatgrass, Sandberg bluegrass, and other herbaceous perennials. Wyoming big sagebrush, mountain big sagebrush and low sagebrush are the predominant expected plant communities in pasture 3 based upon ecological sites. Although no juniper woodland ecological sites occur on the Hart Creek allotment, approximately 700 acres of juniper cover type is currently mapped, reflecting some encroachment of western juniper into sagebrush ecological sites at higher elevations in the allotment. An additional 742 acres is mapped as exotic annual grasslands, according to 2000/2001 satellite imagery, reflecting incursions of cheatgrass and other invasive annuals into the native vegetation communities.

Standard 4 (Native Plant Communities) of the Idaho S&Gs is not met in pastures 1 and 2 of the Hart Creek allotment, but is met in pasture 3. The primary causal factor for not meeting the standard in pastures 1 and 2 of the allotment is historic grazing practices that reduced the composition of deep-rooted perennial herbaceous species within the vegetation communities, while shallower-rooted species, such as Sandberg bluegrass have increased. Vegetation trend in pastures 1 and 2 is static to downward, although current management practices conform to the Guidelines for Livestock Grazing Management. As described in the rangeland health assessment, cheatgrass is common in pastures 1 and 2, and has exhibited an increasing trend over the past decade.

Watersheds

Standard 1 (Watersheds) of the Idaho S&Gs is not met in pastures 1 and 2 of the Hart Creek allotment due to historic livestock grazing management practices; pasture 3 is meeting the standard. While soil surface conditions are currently stabilized in a degraded state, hydrologic function is altered and primarily connected with past grazing practices, which resulted in decreased abundance and diversity of perennial bunchgrasses and forbs. Perennial species with a diversity of rooting structures facilitate proper infiltration, stabilize and protect soil surfaces from raindrop impact, and reduce runoff rates.

Much of the impairment in hydrologic function is associated with a shift from deep-rooted perennial bunchgrasses to relatively shallow-rooted bunchgrasses, such as Sandberg bluegrass and squirreltail. The reduced structural diversity of the vegetation community and localized invasions of annuals are limiting watershed functioning, including proper nutrient cycling, hydrologic cycling, and energy flow.

Water Resources and Riparian/Wetland Areas

The Hart Creek allotment includes 2.85 miles of perennial streams in pasture 1, and many miles of ephemeral or intermittent streams in pastures 1, 2 and 3. Perennial reaches in pasture 1 include 2.25 miles of Hart Creek and 0.6 miles of Pickett Creek. Intermittent or ephemeral streams on the allotment include segments of Bates and Little Hart Creeks in pasture 1, Browns Creek in

Pasture 2, and Browns, Buckaroo, Cat and Little Browns Creeks in pasture 3. Several springs also occur in pasture 3.

Standards 2, 3 and 7 are not being met in the Hart Creek allotment, and current livestock management practices are the significant causal factor. The recent grazing schedule has not allowed for rest years in pasture 3, and the spring developments were not designed to protect the ecological function of the riparian-wetland areas. Flow alterations and invasive species have reduced the ability of some riparian areas on the allotment to recover from livestock impacts. Two reaches of Hart Creek that traverse pasture 1 were rated as functional at-risk (FAR). These reaches support woody riparian species, but lack the late-season flow necessary to fully support desirable sedges and rushes, and have patches of Scotch thistle and whitetop, both Idaho noxious weed species. Residual vegetation has not been sufficient to maintain or improve riparian-wetland function; conditions along Hart Creek, including active bank erosion and a straightened, widened channel, are associated with excessive livestock impacts. Vegetation limitations along Hart Creek due to the lack of late-season flow and presences of noxious weeds and upland species make the riparian vegetation and stream conditions more susceptible to livestock impacts, and less capable of recovering following grazing. The reach of Pickett Creek that occurs in pasture 1 supported appropriate woody riparian vegetation, but the stream channel is over-widened and upland species such as Kentucky bluegrass dominated the understory, instead of the expected sedges and rushes, which more effectively stabilize streambanks due to their extensive, binding root masses. For these reasons, Pickett Creek was also rated FAR.

The unsatisfactory conditions, with the exception of flow alterations in Hart Creek from upstream diversions, are attributed to current livestock grazing practices.

Brown's Creek, which traverses pasture 3, was rated FAR because there were not adequate hydric species to stabilize stream banks during high flow events. Also within pasture 3, Buckaroo Creek, Cat Creek, Little Brown's Creek, and tributaries to Buckaroo and Little Browns Creek were most recently rated FAR. Issues identified include inadequate soil moisture and lack of floodplain inundation to support hydric species that would protect the stream banks, a lack of plant composition and vigor, erosion was occurring, the stream was over-widened, and the stream banks and channel were unstable. The unsatisfactory conditions are attributed to current livestock grazing practices. Herbaceous riparian species such as sedges and rushes, which are important for stabilizing streambanks, are lacking along most stream reaches in the allotment

Five assessed springs in pasture 3 were most recently rated as proper functioning condition (PFC) (1), FAR (1), and non-functional (NF) (3). Improperly placed or unmaintained exclosures are the main issue impacting these springs. Photos from Buckaroo Spring show soil trampling attributed to livestock, and poor general vegetation condition. Excessive erosion and over 50 percent bare soil was noted at the spring in pasture 3 that was rated NF.

Streams on the Hart Creek allotment are on the Idaho 303(d) list of impaired waters, and therefore are not meeting Standard 7. Pickett Creek and Brown's Creek are not meeting cold-water aquatic life beneficial use criteria and have listed pollutants of sedimentation/siltation and temperature. Because these streams are also not meeting Standards 2 and 3 due to current livestock management, it was also determined that current livestock management was a causal factor for failing to meet Standard 7, which is closely tied to riparian and stream channel/floodplain

conditions, which regulate stream temperatures and sedimentation. Bank erosion, over-widened stream channels and lack of appropriate herbaceous riparian species capable of capturing sediment and stabilizing streambanks are common characteristics of streams not meeting Standards 2 and 3 on the allotment. Because these conditions are associated with livestock impacts including streambank trampling and removal of vegetation, it follows that livestock are also the causal factor for failing to meet Standard 7.

Special Status Plants

At least five special status plants (SSPs) occur within the Hart Creek allotment: earth lichen, king's eyelashgrass, white eatonella, white-margined wax plant, and stoutstem threadplant. An occurrence of Simpson's hedgehog cactus has also been reported but has not been located again since the original report. The occurrences of these special status plants are meeting Standard 8. Earth lichen, Kings's eyelashgrass, and stoutstem threadplant are located in pasture 2, with white eatonella in pasture 1. White-margined wax plant is located in pastures 1 and 2. Data on these populations are limited, but most of the SSPs in the Hart Creek allotment are reported to be in good condition with low or no threats from livestock or other disturbances. The Rangeland Health Assessments contain additional detail related to the condition of special status plants, as originally compiled in 2006, and supplemented in 2013.

Wildlife/Wildlife Habitats and Special Status Animals

Standard 8 is not met within the Hart Creek allotment and current livestock management practices are significant causal factors for the failure to meet riparian habitat standards. Upland habitats in pastures 1 and 2 are not providing adequate conditions for many ground dwelling, nesting and foraging species, but historic, rather than current grazing practices are the causal factor. Riparian habitats are not providing adequate breeding and foraging conditions for many dependent wildlife species due to current livestock grazing management practices in riparian habitats.

Upland wildlife and sage-grouse habitat

The Hart Creek allotment consists of three pastures and contains two dominant habitat types: salt desert on the northern portions (the calcareous ecological sites), and shrub-steppe on the southern portions (the loamy ecological sites). There are approximately 21,822 acres of preliminary priority habitat (PPH) and 439 acres of preliminary general sage-grouse habitat (PGH) mapped on the Hart Creek allotment. The shrub steppe habitat is used by sage-grouse during the breeding, summer, and winter seasons, and occurs in all three pastures. The salt desert portion of this allotment is not considered sage-grouse habitat, although it is partially within the coarse-level habitat mapping area. Sage-grouse habitat on the allotment is currently limited due to reductions in deep-rooted perennial grasses and forbs, insufficient sagebrush height, decadent sagebrush and occurrence of cheatgrass. Grass height and abundance, forb abundance, and presence of cheatgrass may be limiting habitat values for wildlife in salt desert shrub habitats in pastures 1 and 2 as well.

Riparian wildlife habitat

Riparian wildlife habitat on the Hart Creek allotment occurs along reaches of Hart Creek, Pickett Creek, Little Browns Creek, Buckaroo Creek, Cat Creek, and several springs. These habitats are limited by inadequate riparian vegetation to protect stream banks, while erosion and bank alteration is occurring and channels are over-widened. Redband trout occur in Pickett Creek and

Hart Creek in pasture 1. Livestock can trample stream banks, which increases the width of a stream, decreases water depth, and increases sediment in the stream. Wider and shallower streams with less shading would have warmer water temperatures and could reduce the amount of redband trout habitat in a stream. Fine sediment can settle on redband redds and suffocate eggs or trap newly hatched fry. Livestock can also trample redds, which could reduce recruitment. Columbia spotted frogs are not known to occur on the allotment.

Guidelines for Livestock Grazing Management

As described in the 2013 determination, current livestock management practices on the Hart Creek allotment do not conform to the following guidelines:

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 to 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, promote or progress toward appropriate stream channel and streambank morphology and functions. Adverse impacts due to livestock grazing will be addressed.

Guideline 10 - Implement grazing management practices and/or facilities that provide for complying with the Idaho Water Quality Standards.

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 Hart Creek allotment are listed below:

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: 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 Hart Creek 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 the Idaho S&Gs where unsatisfactory conditions have been identified on the allotment. Five alternatives were considered and analyzed in the EA, each of which was considered and analyzed in detail for the Hart Creek 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 Hart Creek allotment.

Alternative 1 - Current Situation

This alternative would allow a continuation of your current management on the allotment, but remove active AUMs that have been in voluntary non-use since 1996. As a result, active use would be reduced from to 1,351 AUMs, and livestock numbers would accordingly be reduced to 557 head of cattle. Pastures 1 and 2 would continue to be rested in alternating years, while pasture 3 would be grazed annually from April 21 through June 15.

Alternative 2 - Applicant's Proposed Action

This alternative would renew livestock grazing in accordance with your May 29, 2013 grazing application, and would authorized 2,365 active AUMs. A total of 797 head of cattle would be authorized to graze from March 1 through June 1. Pastures 1 and 2 would continue to be rested in alternating years, while pasture 3 would be grazed annually from April 16 through June 1.

Alternative 3

Under Alternative 3, BLM would establish a grazing schedule that would implement season of use constraints based upon the resources present in each pasture. You would be offered a 10-year permit to graze 353 head of cattle from March 1 through June 1, for a total active use of 1,047 AUMs. The three pastures would be used in a rest-rotation cycle, so that each pasture is rested once every 3 years.

Alternative 4

Under Alternative 4, BLM would establish a grazing schedule that would implement additional constraints on use based upon the high-value resources present in the Hart Creek allotment. You would be offered a 10-year permit to graze 243 head of cattle from April 1 to June 15, for a total active use level of 589 AUMs. A 3-year rest rotation schedule would be implemented, so that each pasture would be used only once in each 3-year rotation.

Alternative 5 - No Grazing

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

Proposed Decision

After considering the current grazing practices, current conditions of the natural resources, the high-value resources found on the allotment, 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 Hart Creek allotment to make significant progress toward meeting the Idaho S&Gs where current livestock management practices are resulting in unsatisfactory conditions, and also move toward achieving the resource objectives outlined in the ORMP.

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

Table LVST-2: Robert Thomas permit for the Hart Creek allotment

Allotment	Livestock		Grazing Period*		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00532 Hart Creek	243	C	4/1	6/15	97	Active	589

Terms and Conditions

1. Grazing use of the Hart Creek allotment (0532) will be in accordance with the grazing schedule and limits to the intensity of use 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 Hart Creek 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.
3. A minimum 4-inch stubble will be left on herbaceous vegetation within the riparian area along 3.25 miles of Hart Creek and 1.0 miles of Pickett Creek in allotment #0532 at the end of the growing season, as identified in the fisheries objective of the Owyhee RMP.

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 apply to the Hart Creek allotment:

Table LVST-3: Hart Creek allotment pasture use schedule

Pasture	Year 1	Year 2	Year 3
1	4/1 to 6/15	Rest	Rest
2	Rest	4/1 to 6/15	Rest

In addition to the 589 Active AUMs specified above, your total permitted use will include 808 AUMs of historic suspended use carried forward from your previous permit².

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.

² 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.

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 Hart Creek allotment. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will best fulfill the BLM's obligation to manage the public lands under the Federal Land Policy and Management Act's multiple use and sustained yield mandate, and will result in the Hart Creek allotment meeting or making significant progress towards meeting the resource objectives of the ORMP and the Idaho S&Gs.

Issues Addressed

Earlier in this decision I outlined the major issues that drove the analysis and decision making process for the Hart Creek allotment. I want you to know that I considered the issues through the lens of each alternative before making my decision. My selection of Alternative 4 for the Hart Creek allotment is based in large part because of my understanding that this selection best addressed those issues, resource conditions and high-value resources on the allotment, in light of the BLM's legal and land management responsibilities³.

³ 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, 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.

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

Although current livestock management practices are not significant factors in failing to meet Standard 4 in pastures 1 and 2, and Standard 4 is met in pasture 3, implementation of Alternative 4 would further reduce and restrict livestock grazing's effects on vegetation resources on the Hart Creek allotment. Completely resting all three pastures in 2 out of every 3 years would provide greater opportunity for cool-season bunchgrass plants to complete their annual growth cycle. Health and vigor of cool-season bunchgrass species would be unimpeded by grazing in 6 to 7 years of the proposed 10-year grazing permit.

Under Alternative 4, progress toward meeting Standard 4 would be unlikely to occur in pastures 1 and 2, because current vegetation lacks the appropriate seed sources and other biotic and abiotic conditions necessary for rapid recovery of these relatively arid, low-elevation sites. However, a conservative approach to grazing these sites would maintain their resilience and resistance to invasion by undesirable species, reducing one of the stressors on vegetation, thereby reducing the likelihood that degraded native sites will become dominated by non-native species. Standard 4 would continue to be met in pasture 3, with its slightly higher elevation and relatively higher biotic integrity.

Issue 2: Improve watershed conditions within upland sites.

Alternative 4 would provide a minimum of 2 out of 3 years of rest for all three pastures and thus reduce physical impacts to soils during their wettest and most vulnerable period. While seasons would be expanded in pastures 1 and 2, resting pastures from grazing in 2 out of 3 years, reducing an additional stressor from the system in those years would provide native plant communities the opportunity to improve to some extent, through increased soil cover, decreased bare ground, and reduced susceptibility to accelerated erosion. Physical impacts from hoof action and utilization of plants would also be reduced over the 10-year permit. This opportunity for maintenance or improvement in soil condition prompted my decision to choose Alternative 4 rather than Alternative 3, which would increase the frequency of use in pastures 1 and 2 as compared to the current management. While AUMs and stocking rates would be lowered, the expected benefits from a reduction in livestock numbers may not be adequate to offset the decreased frequency of rest under Alternative 3. Under Alternative 4, Standard 1 would continue to be met in pasture 3, with its slightly higher elevation and relatively higher biotic integrity.

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

Although some juniper encroachment is occurring at the higher elevations of the Hart Creek allotment, juniper is not a significant causal factor in failing to meet standards, and is not currently driving ecological processes on the allotment. Juniper distribution may be limiting wildlife habitat quality in some areas, and approximately 1,700 acres of sage-grouse PPH are mapped as conifer encroachment areas. Treatment of juniper is outside the scope of the current action, and may be analyzed, designed and implemented through 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 as compared to all alternatives that would continue to authorize grazing within the Hart Creek allotment, livestock remain only one of a number of vectors for seed dispersal and soil surface disturbance. BLM's coordinated and ongoing weed control program would still be required in the absence of livestock grazing in the allotment. Improvements in 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 Hart Creek allotment. In addition, livestock would only be permitted in each pasture in 1 of 3 years, reducing the frequency of opportunities to introduce and spread seeds or plant parts on hooves, hair, or in manure.

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

Under Alternative 4, pasture 1 of the Hart Creek allotment would be fully rested from grazing more frequently than in the past. In years when pasture 1 is used, grazing would occur in the spring, providing adequate time for riparian vegetation to recover and regrow over the summer; however, recovery would be somewhat limited along portions of Hart Creek due to lack of late-season flows. Kentucky bluegrass, cheatgrass and the identified noxious weeds present would continue to compete with more desirable species to some extent. Noxious weeds would continue to be treated in accordance with the Boise District BLM's weed program. Pasture 3, which is also currently not meeting riparian standards, would be rested in 2 of 3 years, as opposed to current management, under which the pasture and associated riparian areas are grazed annually. In addition to the total reductions in grazing, and incorporation of rest in two years of each three-year period would allow adequate time for riparian vegetation to recover vigor and expand, improving streambank stability and eventually improving overall stream characteristics. Therefore, riparian areas would make progress towards PFC, and meeting Standards 2 and 3, and ORMP objectives under Alternative 4. Pasture 2 is currently meeting Standards 2 and 3, and would be expected to continue to meet these standards, and possibly improve further, under this alternative.

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

Standard 8 relative to special-status plants is being met on the Hart Creek allotment. However, under Alternative 4, threats to the five special-status plants known to occur on the allotment from livestock grazing and trampling would be further reduced. Standard 8 relative to special-status plants would continue to be met under Alternative 4.

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

Pastures 1 and 2

Upland and sage-grouse habitat

While some improvements in abundance and vigor of perennial grasses and forbs may occur, progress towards site potential is unlikely to occur in the lower elevations of the allotment due to current biotic and abiotic conditions, which are the result of historic grazing practices. Resting pastures 1 and 2 in 2 out of 3 years would increase the amount of residual cover from perennial

forbs and grasses available for sage-grouse hiding, nesting and escape cover the spring following the rest year. Rest would allow wildlife to breed, reproduce, and raise young without competition or disturbance from livestock in 2 out of 3 years. Habitats would have more cover and forage which would increase reproductive success.

Riparian habitat

Woody and herbaceous vegetation would increase in vigor and reproductive capability. Seedlings would successfully establish, stabilize stream banks, and increase cover and forage for riparian dependent wildlife species. As described under Issue 5, riparian habitat would expand, providing improved habitat for redband trout and other riparian dependent species such as sage-grouse and migratory birds as a result of fully resting riparian habitats from grazing in 2 years out of each 3-year grazing rotation. Habitat improvements would be somewhat limited along Hart Creek due to lack of late-season flow, which limits development of herbaceous hydric vegetation.

Pasture 3

Upland habitat and Sage-grouse habitat

This alternative would allow upland vegetation to grow, reproduce, and establish without disturbance from livestock for 2 of 3 years. This would maximize residual cover of perennial grasses for sage-grouse nesting each spring following a rest year. Forbs that are selectively grazed by cattle could increase in abundance where seed sources are present and when favorable climatic conditions occur.

Riparian habitat

This alternative would allow riparian vegetation to grow, reproduce, and establish without disturbance from livestock for 2 of 3 years. Riparian habitat would be able to expand to its potential and provide improved habitat for riparian dependent wildlife including redband trout, sage-grouse and migratory birds. Under Alternative 4, this allotment would make progress toward meeting Standard 8 relative to the livestock-caused riparian habitat issues described in the Rangeland Health Determination.

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 use targeted grazing to create fuel breaks on these allotments with the hope that those fuel breaks would help control the spread of large wildfires in the area. However, the resource costs associated with this strategy are such that I have decided against it. Ultimately, implementation of Alternative 4 for the Hart Creek allotment will not significantly alter the BLM's ability to fight wildfire in the area.

Although a number of sources identify the potential to use grazing to reduce fine fuels on a landscape scale, identified benefits are greatest with targeted grazing that strategically maintains fuel-breaks to aid fire suppression actions. Landscape-scale fuels reduction with livestock grazing has its greatest application in grass-dominated vegetation types and specifically within seedings of grazing tolerant introduced grasses and annual grasses. Such conditions do not exist on these allotments at a pasture-wide scale. In addition, the levels of livestock grazing and the season of yearly use necessary to reduce fine fuels prior to the fire season are not conducive to sustaining

native perennial herbaceous species. This is one of the main reasons a targeted grazing system to control fire is not viable on these allotments at this time. The BLM's current permit renewal process is focused on improving native upland and riparian plant communities on these allotments, and targeted grazing to create fuel breaks would not support that improvement.

The selected alternatives 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 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 4 for the Hart Creek 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. The selected alternatives combined 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 these allotments will be better armed to survive such changes. The native plant health and vigor protected under these alternatives will provide resistance and resilience to additional stressors, including climate change.

The reduction of stressors to biotic function induced by livestock management practices following implementation of Alternative 4's terms and conditions is anticipated to mitigate the additive stressors induced by climate change, primarily altered precipitation and temperature regimes. Vegetation communities that retain resistance and resilience to stressors would be more likely to persist in the face of a changing climate.

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(s) protects resources in a manner consistent with the BLM's obligations under the Idaho S&Gs and the ORMP. As noted above, I have selected Alternative 4 for the Hart Creek 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 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 healthy, productive ecosystems and alternate socio-economic resources, such as recreation, that rely on healthy, functional and aesthetically pleasing open spaces and wildlife habitats.

I have considered a wide range of issues at the allotment level, including the social and economic impacts that result from modifying grazing authorizations. I have avoided reductions in grazing use levels on allotments where current levels are compatible with meeting rangeland health standards and ORMP objectives and where not compatible, have attempted to select alternatives designed to meet resource needs. In the case of the Hart Creek allotment, which is failing to meet Standards 2, 3, 7, and 8 due to current livestock management, and which is home to several high-value resources and BLM Special Status Species (redband trout, sage-grouse), this has meant selecting that alternative which best responds to those resource needs, balanced by your operational needs to the extent possible.

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 Hart Creek 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 these alternatives, 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 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/owhee_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, while sustaining a reasonable level of livestock grazing. Specifically, Alternative 4 best addresses the riparian condition issues identified in pastures 1 and 3 of the Hart Creek allotment, while maintaining or improving resource conditions elsewhere on the allotment. Alternatives 1 and 2 would implement livestock management practices on the Hart Creek allotment that would allow a continued failure to meet objectives and standards. While Alternative 3 would sustain upland vegetation conditions, upland watersheds would be at risk of continued degradation, and

progress towards Standards 2, 3 and 8 would be marginal, because frequency of rest in pasture 1 would be less frequent than in the past. Alternative 5 would curtail 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 alternatives, as supplemented, lead me to believe elimination of livestock grazing from the Hart Creek 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 (2005). My decision is issued under the following specific regulations:

- 4100.0-8 Land use plans; The ORMP designates the Hart Creek 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 public 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:

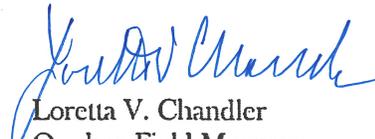
- (1) The relative harm to the parties if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

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
Owyhee Field Manager

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	Bruncau	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.	Bruncau	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

Company	Name		Address	City	ST	Zip	#
	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 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

Company	Name		Address	City	ST	Zip	#
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
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 &	Moore	P.O. Box 14	Melba	ID	83641	71

Company	Name		Address	City	ST	Zip	#
	Georgene						
	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
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