



United States Department of the Interior  
BUREAU OF LAND MANAGEMENT

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Marsing, ID 83639  
(208) 896-5912



In Reply Refer To:  
4160 ID130

November 26, 2013

**REGISTERED MAIL - RETURN RECEIPT REQUESTED**

The Estate of Charles Steiner  
c/o John Steiner  
24597 Collet Rd.  
Oreana, ID 83650

**Notice of Field Manager's Proposed Decision**

Dear John:

Thank you for working with the BLM throughout this permit renewal process. I appreciate your interest in grazing the Louisa Creek and Steiner FFR allotments in a sustainable fashion and am confident that this proposed decision achieves that objective.

The BLM evaluated grazing practices and conditions in the Louisa Creek and Steiner FFR allotment through 2013. 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. As part of the BLM's evaluation, rangeland health assessments/evaluations and determinations were completed. 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 Louisa Creek and Steiner FFR allotments are two of 20 allotments within 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) (USDI BLM, 1999) for the purpose of developing grazing management alternatives for all three groups, including for the Toy Mountain Group (Group 3) 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 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 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 application for renewal of your permit to graze livestock in the Louisa Creek and Steiner FFR allotments. You submitted an application for renewal of this grazing permit, received by the BLM on October 31, 2011. In late May 2013, BLM met with you to discuss allotment conditions, objectives, and livestock management. Additionally, you were asked during the 2013 meetings to update the previously submitted application. No update to your October 31, 2011, application was received following the 2013 meeting.

After evaluating conditions on the land, meeting with you, and reviewing of information received from the public, it became clear that resource concerns exist on the Louisa Creek and Steiner FFR allotments.

Addressing resource concerns is integral to renewing your livestock grazing permit. Therefore, my office prepared and issued the Toy Mountain Group Environmental Assessment<sup>1</sup> (EA) in which we considered a number of options and approaches to maintain and improve resource conditions within the twenty allotments of the Toy Mountain Group. Specifically, the BLM considered and analyzed in detail five alternatives. Other alternatives were considered, but not analyzed in detail. Our objective in developing alternatives was to consider options that are important to you as the permittee, and to consider options that, if selected, will ensure that the natural resources in the Louisa Creek and Steiner FFR allotments 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 Louisa Creek and Steiner FFR allotments. This decision is the culmination of a comprehensive review of the relationship of between resource conditions and livestock grazing practices on the Louisa Creek and Steiner FFR allotments, completed in accordance with the grazing regulations, Idaho S&Gs, the National Environmental Policy Act (NEPA), and the ORMP.

This proposed decision will:

- Describe current conditions and issues on the Louisa Creek and Steiner FFR allotments;
- 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 Louisa Creek and Steiner FFR allotments;
- Outline my proposed decision to select Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment; and
- Explain my reasons for proposing this decision.

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<sup>1</sup> 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.

## Background

### *Allotment Setting*

The Louisa Creek and Steiner FFR allotments are managed in conjunction with one another under one livestock operation.

### Louisa Creek allotment

The Louisa Creek allotment is located approximately 3 miles east of Triangle, Idaho (**Map 1**). The ORMP categorized the Louisa Creek allotment as an Improve (I) category allotment with a medium priority for management. The allotment is divided into six pastures. About 94 percent is public lands and 6 percent is private; no state lands fall within the allotment (Table LVST-1).

**Table LVST-1: Louisa Creek allotment acreages ownership by pasture**

Pasture	BLM (ac.)	Private (ac.)	State (ac.)	Total (ac.)
1	2,086	1	0	2,087
2	1,828	0	0	1,829
3	3,046	33	0	3,079
4	1,084	40	0	1,123
5	1,011	607	0	1,618
6	856	1	0	857
Total	<b>9,911</b>	<b>681</b>	<b>0</b>	<b>10,592</b>

Plant communities within this allotment are a mix of sagebrush steppe and juniper woodlands; juniper is currently the dominant component of a large portion of the landscape in the Louisa Creek allotment. Across these sites, effective average annual precipitation ranges from 10 to 16 inches. Mapping done by the Pacific Northwest National Laboratory using 2000/2001 Landsat satellite imagery, and updated for vegetation treatments and fire, indicate the current vegetation in the Louisa Creek allotment is dominated juniper (30 percent), low sagebrush (27 percent), mountain big sagebrush (21 percent), mountain shrub (12 percent), bunchgrass (5 percent), big sagebrush (3 percent), and wet meadow and exotic annual (1 percent each).

Western juniper was recorded as an invasive species in all pastures of the Louisa Creek allotment, and was present in the greatest amounts in pastures 3 and 4. Juniper dominance is a result of altered fire regimes and, to a lesser extent, historic livestock grazing practices that reduced fuels. The allotment is not meeting Standard 4 (Native Plant Communities) because of juniper encroachment.

Two springs, Antelope Spring and Toy Seep, and segments of Cow Valley, Josephine, Louisa, North Fork Castle, and Rock Creeks exist on BLM lands within the allotment. Approximately 5.6 miles of stream were assessed and 4.4 miles (79 percent) were rated functional at risk (FAR); the remaining 1.2 miles were rated as proper functioning condition (PFC). Riparian habitats for redband trout and spotted frogs are limited by inadequate riparian vegetation and residual vegetation to protect stream banks, unstable beaver dams, inadequate soil moisture to maintain hydric vegetation, and vertically and laterally unstable channels. Standards 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain) and 8 (Threatened and Endangered Plants and Animals) are not meeting and impacts to these springs and streams are associated with current

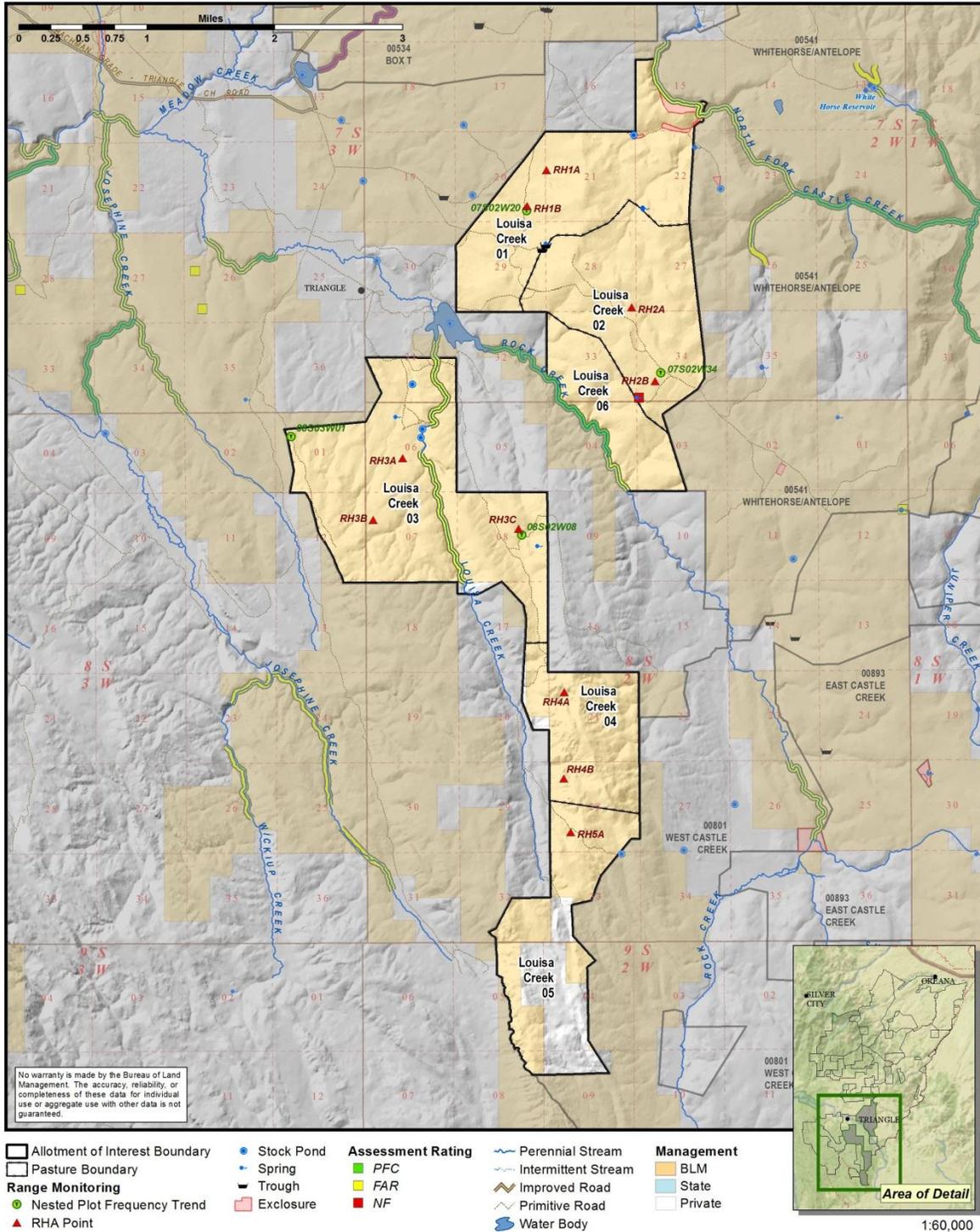
livestock grazing management<sup>2</sup>. Standard 7 (Water Quality) is also not meeting because of current livestock grazing management.

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<sup>2</sup> Resource conditions of the Louisa Creek allotment are discussed further in the Resource Conditions section of this decision.



# Map 1: Louisa Creek (00601) Allotment



### Steiner FFR allotment

The Steiner FFR allotment is composed of two parcels immediately south of Triangle, Idaho (**Map 2**). The ORMP categorized the Steiner FFR allotment as an Improve (I) category allotment with a low priority for management. Authorized use on the allotment is 98 AUMs (all active, none in suspension) with a season of use of December 1 to 31. The current permit includes a term and condition that the number of livestock and season of use are at your discretion. Recent actual use data indicate grazing typically occurs in pasture 1 from late April to late November. Pasture 2 is typically used from mid-July to late September. Upland vegetation communities present on public land within the two pastures of the Steiner FFR allotment are primarily the slopes and benches that are used by livestock to a lesser extent than the private land in the valley bottoms. About 22 percent of the allotment is public land, 61 percent is private, and 17 percent is State land (Table LVST-2).

**Table LVST-2:** Steiner FFR allotment acreages ownership by pasture

Pasture	BLM (ac.)	Private (ac.)	State (ac.)	Total (ac.)
1	1,221	3,097	1,256	5,575
2	353	1,348	0	1,701
Total	<b>1,574</b>	<b>4,445</b>	<b>1,256</b>	<b>7,275</b>

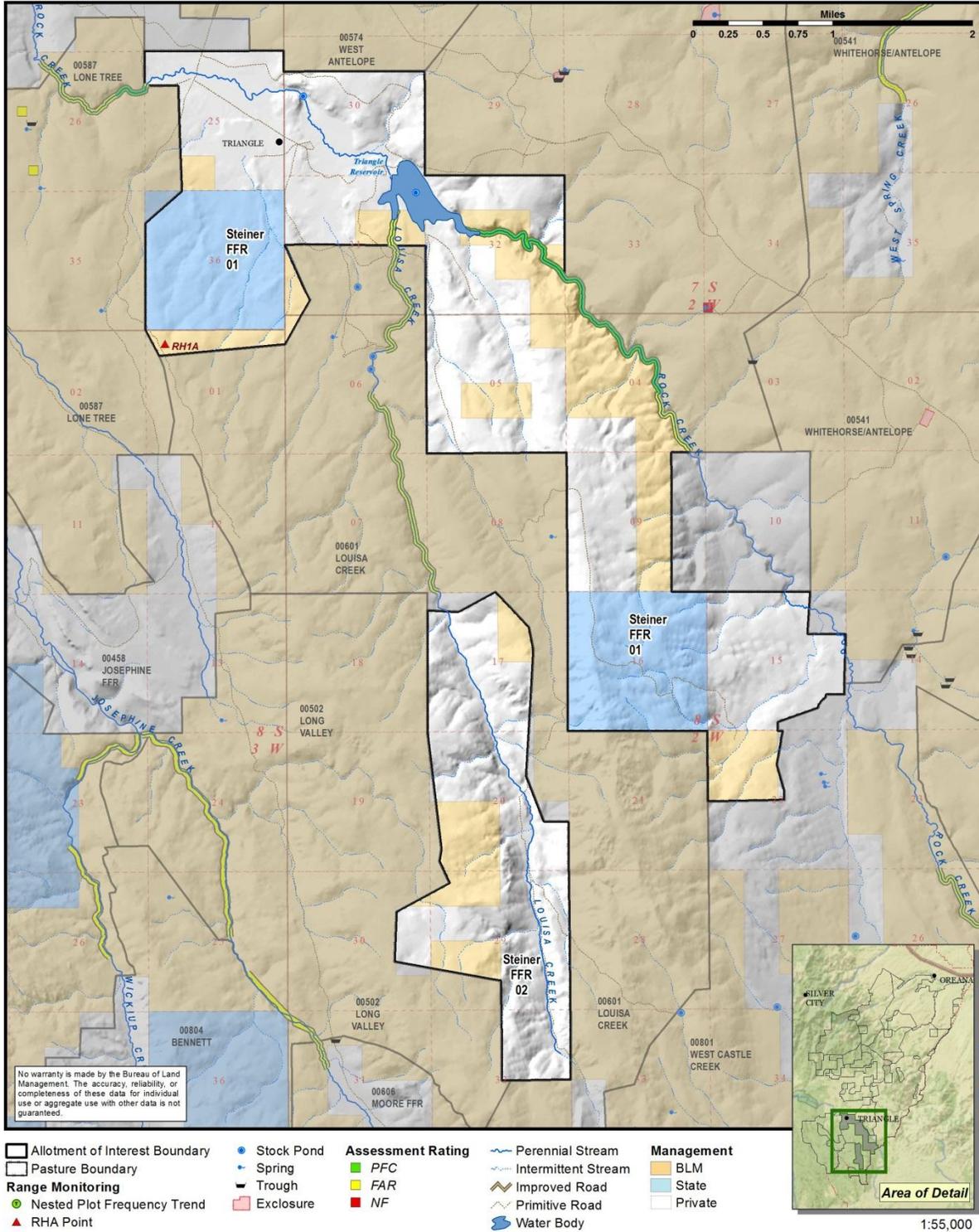
Ecological sites mapped across the allotment include the Shallow Claypan 12-16” Low sagebrush/Idaho fescue, Loamy 13-16” Mountain big Sage/bluebunch wheatgrass-Idaho fescue, Very Shallow Stony Loam 10-14” Low sagebrush/Sandberg bluegrass-bluebunch wheatgrass, and Dry Meadow Nevada bluegrass-alpine timothy-meadow sedges. Across ecological sites within the allotment, effective average annual precipitation ranges from 10 to 16 inches. Mapping done by the Pacific Northwest National Laboratory using 2000/2001 Landsat satellite imagery, updated for vegetation treatments and fire, indicated the current vegetation in the Steiner FFR allotment is dominated by juniper (34 percent), low sagebrush (18 percent), mountain big sagebrush (17 percent), mountain shrub (15 percent), agriculture (7 percent), bunchgrass (3 percent), wet meadow (2 percent), big sagebrush (1 percent), and big sagebrush and exotic annual (1 percent each).

Juniper encroachment is evident on the allotment; it is not meeting Standard 4 (Native Plant Communities) for this reason. A small portion of pasture 1 is preliminary priority habitat for sage-grouse, but not the remainder of the allotment. Pasture 1 is used by sage-grouse during the breeding season. The majority of the allotment should consist of shrub steppe habitats but juniper encroachment is converting much of the allotment to woodland habitats, causing the allotment to fail Standard 8 (Threatened and Endangered Plants and Animals).

Standards 2 (Riparian Areas and Wetlands) and 3 (Stream Channel/Floodplain) are meeting. Riparian habitat occurs on public land within pasture 1 in the form of Louisa (0.3 mi) and Rock Creeks (2.9 mi). Both creeks (assessed at PFC in 2011) provide adequate habitat for spotted frog, redband trout, and migratory birds. Standard 7 (Water Quality) is not meeting because of flow alteration and sedimentation/siltation, which would be attributed to livestock, however because Standards 2 and 3 are being met, it was determined the causal factor is not livestock.



# Map 2: Steiner FFR (00613) Allotment



## *Current Grazing Authorization*

### Louisa Creek allotment

You currently graze livestock within the Louisa Creek allotment pursuant to a grazing permit issued by the BLM. The terms and conditions of that grazing permit are as follows in Table LVST-3.

**Table LVST-3:** Louisa Creek allotment Permit Terms and Conditions

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00601 Louisa Creek	321	Cattle	5/1	10/31	96	Active	1,868

### **Terms and conditions:**

1. All cattle 6 months of age or older must be ear tagged with assigned color and number on the Louisa Creek allotment (#0601).
2. A minimum 4-inch stubble will be left on herbaceous vegetation within the riparian area along 0.5 miles of Rock Creek in allotment #0601 at the end of the growing season, as identified in the fisheries objective of the Owyhee RMP.
3. Turnout is subject to the Boise District range readiness criteria.
4. Your certified actual use report is due within 15 days of completing your authorized annual grazing use.
5. Salt and/or supplement shall not be placed within one quarter (1/4) mile of springs, streams, meadows, aspen stands, playas, and water developments.
6. Changes to the scheduled use require prior approval.
7. 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.
8. Livestock enclosures located within your grazing allotments are closed to all domestic grazing use.
9. 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.
10. 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.
11. 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.

12. Livestock grazing will be in accordance with your allotment grazing schematic(s). Changes in scheduled pasture use dates will require prior authorization.
13. Utilization may not exceed 50 percent of the current year's growth.
14. United States District Court for the District of Idaho imposed terms and conditions
  - o 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;
  - o 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;
  - o 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
  - o Stream bank damage attributable to grazing livestock will be less than 10 percent on a stream segment.

The current permit authorizes 2,522 AUMs, of which 1,868 AUMs are active use and 654 AUMs are suspension AUMs. In most years you have averaged use of 1,601 AUMs, with a maximum use of 1,798 in 2012. The authorized season of use for the allotment is May 1 to October 31 annually. Recent actual use data provided annually by the permittee indicates that grazing use of pastures 1 and 2 alternates between early use (through late June) and late use (beginning in early October). The remaining pastures are typically used mid-season from early July to late September. The current permit authorizes an annual use of 1,868 animal unit months (AUMs) of forage from public land and a season of use between May 1 and October 31. 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.

Steiner FFR allotment

You currently graze livestock within the Steiner FFR allotment pursuant to a grazing permit issued by the BLM. The terms and conditions of that grazing permit are as follows in Table LVST-4.

**Table LVST-4: Steiner FFR allotment Permit Terms and Conditions**

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00613 Steiner FFR	96	Cattle	12/1	12/31	100	Active	98

**Terms and conditions:**

1. The number of livestock and season of use on the fenced federal range (FFR) allotment #0613 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.

Your current permit authorizes 98 AUMs, all of which are active use and none are in suspension. Although the authorized season of use for the allotment is December 1 to December 31, the permit includes a term and condition that the number of livestock and season of use within the allotment is at the permittee's discretion. Recent actual use data indicate that grazing use typically occurs in pasture 1 beginning in late April and extending to late November. Pasture 2 is typically used from mid-July to late September.

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 of a varied number of AUMs and seasons of use over the past several years.

### ***Resource Conditions<sup>3</sup>***

The BLM completed a rangeland health assessment, evaluation, and determination for both the Louisa Creek and Steiner FFR allotments in 2013 by supplementing the assessments completed in 2006 (USDI BLM, 2013a) (USDI BLM, 2013b). The Evaluation and Determination documents

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<sup>3</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.10 and Section 3.3.17 and Appendix E.

concluded that some of the resources on the Louisa Creek and Steiner FFR allotments were not meeting the Idaho S&Gs (Table 5).

In the Louisa Creek allotment, the BLM determined Standards 1, 2, 3, 4, 7 and 8 of the applicable Standards for Rangeland Health are not being met. Standards 5 and 6 are not applicable to this allotment. Current livestock grazing management practices are significant factors in not meeting Standards 2, 3, 7, and 8 whereas current livestock management practices are not significant factors toward not meeting Standards 1 and 4. Livestock management practices do not conform with the applicable Livestock Grazing Management Guidelines 5, 7, and 10.

In the Steiner FFR allotment, the BLM determined Standards 4, 7, and 8 of the applicable Standards for Rangeland Health are not being met, although current livestock grazing management practices are not significant factors. Standards 5 and 6 are not applicable to this allotment. Standards 1, 2, and 3 are being met in the Steiner FFR allotment. Livestock management practices are in conformance with all applicable Livestock Grazing Management Guidelines.

**Table LVST-5:** Summary of the Standards and associated Guidelines under current BLM grazing management in the Toy Mountain Group allotments

Allotment	Standards met	Standards not met, but making significant progress	Standards not being met	Standards not being met and current livestock grazing is a significant causal factor	Standards not applicable	Not in conformance with associated guidelines
Louisa Creek (0601)			1, 4	2, 3, 7, 8	5, 6	5, 7, 10
Steiner FFR (0613)	1, 2, 3		4, 7, 8		5, 6	

## Vegetation - Uplands

### Louisa Creek<sup>4</sup>

The Idaho Standards for Rangeland Health Standard 4 (Native Plant Communities) is not met in pastures 3, 4, and 5 of the Louisa Creek allotment due to juniper encroachment into sagebrush steppe vegetation communities. Western juniper was recorded as an invasive species in all pastures of the Louisa Creek allotment, and was present in the greatest amounts in pastures 3 and 4. Juniper occurrence in pasture 5 was noted as a slight-to-moderate departure from reference site conditions, although its presence on site in rangeland health assessment photos and NAIP imagery suggests greater dominance. The dominance of juniper is greater throughout the allotment than identified at reference site conditions, as an inclusion in small locations with shallow soils. Juniper dominance is a result of altered fire regimes and, to a lesser extent, historic livestock grazing practices that reduced fuels. Indicators of biotic integrity, other than the indicator for invasive species where juniper dominance was noted, were documented in the 2006 evaluation as within the range of anticipated deviation. Because grazing occurs after the active growing season in pastures 3, 4, and 5, it was concluded that current livestock management was not the causal factor for the allotment's failure to meet Standard 4.

<sup>4</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.10.1.1

At the same time, a number of information sources indicate that the Owyhee Resource Management Plan management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas has been met within pastures 1 and 2, while not met in pasture 3, 4, and 5. Information sources include the vegetation ecological site inventory data, as updated in the 1999 Owyhee Resource Management Plan, that support the need for improvement from 65 percent early seral condition and 35 percent mid-seral condition; native perennial bunchgrass trend data between 2007 and 2011 at permanent trend plots that identify static and downward trends; and notes at many rangeland health assessment sites identifying vegetation composition dominated by shallow-rooted grasses, inconsistent with reference site conditions.

To summarize, the Louisa Creek allotment is not meeting Standard 4 because juniper encroachment into vegetation communities that should not include juniper in excess of a few scattered trees is competing with native perennial shrub, bunchgrass, and forb species. Fire frequency that is altered from natural disturbance regimes contributes to conditions that lead to a failure to meet the standard due to juniper encroachment. The ORMP vegetation objectives to improve vegetation health/condition are also not met with static and downward trend recorded.

#### Steiner FFR<sup>3</sup>

Standard 4 is not being met in the two pastures that make up the Steiner FFR allotment, although current livestock management practices are not a contributing factor. Upland vegetation communities present on public land within the two pastures of the Steiner FFR allotment are primarily the slopes and benches that are used by livestock to a lesser extent than the private land in the valley bottoms. Juniper is a dominant component of a large portion of the landscape in the Steiner FFR allotment.

The RHA in pasture 1 identified indicators for biotic integrity departing from reference site conditions at a none-to-slight or slight-to-moderate degree. One exception was a moderate departure for invasive plants attributed to juniper throughout the site. NAIP imagery from 2011 indicates that juniper encroachment has occurred to a moderate degree on public lands within the allotment.

No assessment has been completed in pasture 2 of the Steiner FFR allotment; however, vegetation communities are similar to those present on public land parcels in pasture 1. Annual deferment of grazing use in pasture 2, until after the active growing season for upland bunchgrass species as compared to season-long use in pasture 1, leads to the conclusion that current livestock grazing is not contributing to the allotment's failure to meet Standard 4. With the exception of limitations to function caused by juniper, the vegetation communities of the Steiner FFR allotment as a whole provide proper nutrient cycling, hydrologic cycling, and energy flow.

With the exception of limitations to function caused by juniper, the vegetation communities of the Steiner FFR allotment as a whole provides proper nutrient cycling, hydrologic cycling, and energy flow. The Steiner FFR allotment is not meeting Standard 4 (Native Plant Communities) due to altered fire regimes and juniper encroachment. A conclusion regarding the ORMP objective to improve vegetation health/condition cannot be reached in the absence of trend data.

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<sup>3</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.17.1.1

## Watersheds

### Louisa Creek<sup>6</sup>

Historic grazing practices and western juniper encroachment are significant causal factors for not meeting upland watershed Standard 1 in pasture 3 of the Louisa Creek allotment; pastures 1, 2, 4, and 5 are meeting Standard 1.

Where western juniper encroachment dominates and where desirable shrubs, perennial grasses, and forbs are of low abundance, soil and hydrologic function are negatively affected. Because overall watershed conditions are closely tied to the health of the biotic community, the current imbalance of vegetation composition identified in pastures 3, 4, and 5 for upland vegetation is a concern where juniper encroachment and dominance is not a portion of site potential.

Most indicators of soil and hydrologic integrity were documented in the 2006 evaluation as within the range of anticipated deviation with the exception of pasture 3. Soil surface loss and degradation has occurred as evidenced by extreme pedestals and water flow patterns. These are attributed to historic grazing since soils are stabilizing based on developing biological crusts over historic erosion relics and plentiful rock content. However, more recent ground cover data in the pasture shows a downward trend that correlates to a reduction in sagebrush and deep-rooted perennial bunchgrasses that can also be linked to the encroachment of western juniper.

A similar relationship between impaired hydrologic function and a reduction in a functional range community can be observed in pastures 4 and 5. Physical soil degradation and stability is currently not a concern due to extensive armoring of surface soils by coarse fragments and rocks. However, the absence of shrubs and the pasture-wide departure from reference conditions caused by western juniper alter infiltration and soil moisture reduces site capability for the proper capture, storage and management of moisture.

Taken together, soil and hydrologic function are compromised and decrease the ability for proper nutrient cycling, hydrologic cycling, and energy flow. Historic livestock management and the invasion of western juniper are the causal factors in not meeting Standard 1 in pasture 3.

### Steiner FFR<sup>7</sup>

Standard 1 is being met in the Steiner FFR allotment, with watershed indicators showing little departure from expected conditions for the ecological site. Departure from reference site conditions of soil and hydrologic function-related indicators vary from none-to-slight to slight-to-moderate and reflect stable soils that display past and some active impacts, although abundant gravel, adequate litter, and fair plant diversity are in place to reduce erosion potential.

The biotic integrity shows a departure from reference site conditions where juniper has not been affected by natural fire regimes. It has the potential to contribute to the failure to meet Standard 1 in the future, so pastures 1 and 2 are considered to be at-risk.

Although no assessment has been completed for the public land parcels in pasture 2, similar

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<sup>6</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.10.1.2

<sup>7</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.17.1.2

vegetation communities to pasture 1, annual deferment of grazing use until after the active growing season, and no spring use leads to a conclusion that Standard 1 is being met. With the exception of increased risk to watershed health due to future juniper encroachment, the plant community and soil conditions are adequate to provide for proper nutrient and hydrologic cycling and energy flow. Current livestock management is compatible with attainment of Standard 1 for the Steiner FFR allotment.

## **Water Resources and Riparian/Wetland Areas**

### Louisa Creek<sup>8</sup>

Standards 2 and 3 are not being met in the Louisa Creek allotment because of current livestock management. Approximately 5.6 miles were assessed and 4.4 miles (79 percent) were rated functional at-risk (FAR); the remaining 1.2 miles were rated as proper functioning condition (PFC). Issues identified included areas with adequate soil moisture to support hydric species that stabilize stream banks, the presence of noxious weeds, areas of lateral and vertical instability, and unstable beaver dams. Two springs in pastures 1 and 2 were assessed; Toy Seep was non-functioning (NF), and Antelope Spring was in PFC. Although the area inside the enclosure at Antelope Spring contains robust vegetation and was in PFC, the area outside the enclosure has been heavily impacted. Observed during a field visit in 2013 was excessive trampling and erosion of riparian soils. The concern identified for Toy Seep was that the development pipes all of the source water into cattle troughs, leaving none for the spring to remain functional.

Because of current management, residual vegetation has not been sufficient to maintain or improve riparian-wetland function; the recent grazing schedule has not allowed for rest or deferment years, and the spring development was not designed to protect the ecological function of the riparian-wetland areas. Therefore, current livestock grazing management practices do not conform with the Idaho Guidelines for Livestock Grazing Management applicable to Standards 2 and 3.

The Louisa Creek allotment is not meeting Standard 7 (Water Quality), and current livestock grazing management practices are significant factors. Current information from the Idaho Department of Environmental Quality (IDEQ) identifies approximately 13.7 miles of streams on BLM lands within the Louisa Creek allotment that are not supporting the beneficial uses due to flow alteration and sediment. Sedimentation is tied to livestock use as a result of impacts to riparian area vegetation and the failure of Standards 2 and 3 because of current management.

### Steiner FFR<sup>9</sup>

Standards 2 and 3 are being met in the Steiner FFR allotment. Two named streams traverse the allotment, Louisa and Rock Creek, and both were most recently (2011) assessed in PFC.

Standard 7 is not being met in the allotment, but not due to current livestock management. Current IDEQ information identifies that the BLM portions of the Steiner FFR allotment contain approximately 3.8 miles of streams that are not supporting the watershed's beneficial uses, and

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<sup>8</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.10.1.3

<sup>9</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.17.1.3

1.2 miles that have not been assessed. The allotment contains portions of six AUs (assessment units) with associated beneficial uses and pollutants. Four of the AUs are currently not supporting the beneficial uses, but all of the streams that occur within the allotment have been removed from the 303(d) list of impaired waters for temperature because they have approved Total Maximum Daily Loads (TMDLs) with actions identified to de-list the streams. However, flow alteration and sediment remain issues that have caused streams in three AUs to be 303(d) listed.

Based on the streams' presence on the 303(d) list of impaired waters for flow alteration and sediment, Standard 7 is not being met in pasture 1 of the Steiner FFR allotment. The standard is not applicable to pasture 2. However, the allotment is in conformance with the Guidelines for Livestock Grazing Management because both Standards 2 and 3 are being met in pasture 1; because Standards 2 and 3 are being met, the causal factor for failing Standard 7 is mostly likely not due to current livestock management.

### **Special Status Plants**

#### Louisa Creek/Steiner FFR

No populations of special status plant species are known to occur in these allotments

### **Wildlife/Wildlife Habitats and Special Status Animals**

#### Louisa Creek<sup>10</sup>

The north end of the allotment (pastures 1, 2, and 6) exhibits less juniper encroachment and is used by sage-grouse during the breeding, summer, and winter seasons. The southern portions of the allotment (pastures 3, 4, and 5) are more dominated by juniper and appear to be less used by sage-grouse. Sage-grouse breeding, summer, and winter habitat is not limited by current vegetative conditions in pastures 1, 2 and 6. However, breeding and summer habitat is limited by decreased cover and height from perennial grasses and forbs and juniper encroachment in pastures 3, 4, and 5.

Standard 8 for wildlife is not met in the Louisa Creek allotment. Upland and riparian habitats are not providing adequate conditions for many shrub-obligate and riparian dependent species. Although sagebrush and perennial herbaceous vegetation understory components (bunchgrass heights, forb diversity and abundance) are providing suitable breeding, upland summer, and winter habitat conditions in portions of pastures 1 and 2, juniper encroachment into formerly usable sage-grouse habitats in the remaining portions of these pastures is limiting habitat suitability for sage-grouse overall. Standard 8 for wildlife is not met in pastures 3, 4, and 5 due to the dense juniper woodlands that have replaced former shrub steppe habitats. Conversion to juniper woodlands comes at the expense of shrub steppe habitats which are the proper plant community reference state and condition for the ecological sites that predominate within the allotment. Juniper encroachment is a primary causal factor for the Louisa Creek allotment not meeting Standard 8 for wildlife in upland habitats.

The majority of riparian habitats (lotic and lentic systems) within the allotment are not in proper functioning condition. They are not providing adequate breeding and foraging conditions for many

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<sup>10</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.10.1.5

dependent wildlife species due to a lack of structural diversity, inadequate soil moisture for hydric vegetation that stabilize stream banks, areas of lateral and vertical instability, unstable beaver dams, and noxious weeds. These factors result in less-than-suitable habitat for a diversity of species including migratory birds, redband trout, and Columbia spotted frogs. Current livestock grazing management practices are the causal factor for not meeting Standard 8 wildlife in riparian habitats.

Because the condition, abundance, structural stage, and distribution of plant communities required for diverse and desired wildlife populations are not maintained or enhanced, and because special status species' habitats are inadequate to increase or maintain populations so as to preclude for listing (for sagebrush and shrub obligates and dependent species in particular), these major ecological site alterations from their reference states discussed above do not conform with ORMP objectives WDLF-1 and SPSS-1.

#### Steiner FFR<sup>11</sup>

A small portion of pasture 1 is preliminary priority habitat (PPH) for sage-grouse and is used by sage-grouse during the breeding season. The majority of the allotment should consist of shrub steppe habitats, but juniper encroachment is converting much of the allotment to woodland habitats.

Standard 8 for wildlife is not being met in the Steiner FFR allotment, primarily due to the conversion of shrub steppe habitat types to woodland/forest habitat types. The increase in woodland habitats in ecological sites where juniper is considered an invasive species and a minor habitat component, at most, comes at the expense of shrub steppe habitats, which are the proper plant community reference state and condition for the ecological sites that predominate within the allotment. Although an increase in juniper woodlands in the allotment provides a novel habitat for special status species such as flammulated owl, Lewis' woodpecker, and Williamson's sapsucker, a loss of shrub steppe vegetation communities results in a deficiency of adequate habitat for sagebrush-obligate and shrub-dependent special status wildlife species including sage-grouse, pygmy rabbit, Brewer's sparrow, sage sparrow, and loggerhead shrike.

In addition, because the condition, abundance, structural stage, and distribution of plant communities required for diverse and desired wildlife populations is not maintained or enhanced, and because special status species' habitats are inadequate to increase or maintain populations so as to preclude an impetus for listing (for sagebrush- and shrub-obligates and -dependent species in particular), these major ecological site alterations from their reference states do not conform to ORMP objectives WDLF-1 and SPSS-1.

#### *Guidelines for Livestock Grazing Management*

Current grazing management practices do not conform to the applicable Livestock Grazing Management Guidelines 5, 7, and 10. Guidelines 5, 7, and 10 are as follow:

*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*

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<sup>11</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.17.1.5

*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 function. Adverse impacts due to livestock grazing will be addressed.*

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

### ***Issues<sup>12</sup>***

Through the scoping process, 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.*

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

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

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<sup>12</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 1.6.3

### *Analysis of Alternative Actions<sup>13</sup>*

Based on the current condition of the Louisa Creek and Steiner FFR allotments 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 toward meeting standards where unsatisfactory conditions have been identified on the allotment. Overall, five alternatives were considered and analyzed in the EA, each of which was considered in detail and analyzed for these allotments. The range of alternatives developed include: Alternative 1 - Current situation, Alternative 2 - Applicant's 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 Preliminary EA detailing these 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.

### **Proposed Decision**

After considering the current grazing practices, current conditions of the natural resources, the alternatives and analysis in the EA, and 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 Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment. Implementation of these alternatives over the next 10 years will allow these allotments to either meet or make significant progress toward meeting the Idaho S&Gs, while also moving toward achieving the resource objectives outlined in the ORMP.

#### *Proposed Decision - Louisa Creek allotment*

The terms and conditions of the grazing permit for the Louisa Creek allotment would be as follows in **Table LVST-6**.

**Table LVST-6:** Louisa Creek allotment Mandatory and Other Terms and Conditions

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00601 Louisa Creek	177	Cattle	5/1	10/31	96*	Active	1,028

\* Application of percent public land to the offered permit is subject to submission of documentation of private land in the allotment controlled by the permittee.

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

1. Grazing use of the Louisa Creek allotment (0601) will be in accordance with the grazing schedule and limits to the intensity of use identified in Tables LVST-5 and -6 of the final decision of the Owyhee Field Office Manager dated \_\_\_\_\_.  
Flexibility in dates of moves between pastures is provided to meet resource management

<sup>13</sup> For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Sections 2.4.10 and 2.4.17

and livestock management objectives, as long as move dates adhere to seasons of use constraints identified in the decision. 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 Louisa 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 0.5 miles of Rock Creek in allotment #0601 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 trailing permit or similar authorization may be required prior to crossing public lands.
5. Livestock enclosures 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.

### **Grazing Schedule**

As noted in Other Term and Condition #1, the grazing schedule for the Louisa Creek allotment (identified below) must be followed. The grazing schedule for the Louisa Creek allotment, identified in Table LVST-7, would be authorized and its implementation is included as a term and condition of the permit offered. Flexibility in dates of moves between pastures would be provided to meet resource management and livestock management objectives provided resource constraints are met. Constraints to seasons, intensities, duration, and frequency of grazing as described in Table LVST-8 must be adhered to.

**Table LVST-7: Louisa Creek allotment Grazing Schedule**

Pasture	Years 1 and 2	Year 3
1	5/1 to 6/10*	9/16 to 10/31
2	10/1 to 10/15	5/16 to 5/31
3	6/11 to 7/31 * **	6/1 to 6/30
4 and 5	8/1 to 9/30	7/1 to 9/15
6	10/16 to 10/31	5/1 to 5/15

\* Upland utilization limit not to exceed 20 percent in pastures 1 or 2 and 40 % in pastures 3, 4, or 5 at the end of the active growing season (7/15)

\*\* When grazing occurs in pastures with riparian resources during specified time constraint periods, limit the intensity of use to 1) Stubble height no less than 6 in, 2) Woody browse use no greater than 30 percent incidence of use on most recent year's lead growth, and 3) Bank alteration no greater than 10 percent (see Section 2.2.3)

Flexibility in dates of moves between pastures would be provided to meet resource management and livestock management objectives (constraints on flexibility seen in Table LVST-8, below), provided resource constraints are met.

**Table LVST-8: Constraints to seasons, intensities, duration, and frequency of grazing use specific to the Louisa Creek allotment under Alternative 3**

Resource	Pasture 1	Pasture 2	Pasture 3	Pasture 4	Pasture 5	Pasture 6
<b>Sage-grouse (nesting/early brood-rearing)</b>	no use 4/1 to 6/30; 1 of 3 years	no use 4/1 to 6/30; 1 of 3 years	no use 4/1 to 6/30; 1 of 3 years	NA	NA	no use 4/1 to 6/30; 1 of 3 years
<b>Redband Trout (spawning)</b>	no use 3/15 to 6/15; 1 of 3 years	NA	no use 3/15 to 6/15; 1 of 3 years	NA	NA	no use 3/15 to 6/15; 1 of 3 years
<b>Spotted Frog (breeding)</b>	NA	NA	no use 5/1 to 6/15; 1 of 3 years	NA	NA	no use 5/1 to 6/15; 1 of 3 years
<b>Vegetation</b>	no use 5/1 to 7/15; 2 of 3 years*	no use 5/1 to 7/15; 2 of 3 years*	no use 5/1 to 7/15; 2 of 3 years*	no use 5/1 to 7/15; 2 of 3 years*	no use 5/1 to 7/15; 2 of 3 years*	no use 5/1 to 7/15; 2 of 3 years*
<b>Soils</b>	no use 3/1 to 5/31; 1 of 3 years	no use 3/1 to 5/31; 1 of 3 years	no use 3/1 to 5/31; 1 of 3 years	no use 3/1 to 5/31; 1 of 3 years	no use 3/1 to 5/31; 1 of 3 years	no use 3/1 to 5/31; 1 of 3 years
<b>Riparian/ Water Quality</b>	no use 7/1-9/30; 1 of 3 years	no use 7/1-9/30; 1 of 3 years	no use 7/1-9/30; 1 of 3 years	NA	NA	no use 7/1-9/30; 1 of 3 years

\* Flexibility to graze more frequently between 5/1 and 6/30 with utilization limits (see Section 2.2.3)

### Notes on the Terms and Conditions

You will be offered a grazing permit for a term of 10 years for the Louisa Creek allotment; permitted use is summarized in Table LVST-9. Implementation of Alternative 3 will result in a reduction from 1,868 AUMs in the existing permit to 1,028 AUMs. The elimination of 841 AUMs of active use would not result in a conversion to suspended AUMs<sup>14</sup>. The difference in AUMs

<sup>14</sup> The affected reduction in Active AUMs will not be transferred to suspension, as this is not a temporary reduction (see, e.g., 43 CFR § 4100.0-5, Definitions), but a reduction under 43 CFR § 4110.3-2 (b).

would be the result of a reduction in the number of cattle authorized and restrictions on timing of use based on the grazing schedule present in Table LVST-7.

**Table LVST-9:** Permitted grazing use within the Louisa Creek allotment

Active Use	Suspension	Permitted Use
1,028 AUMs	654 AUMs	1,682 AUMs

***Proposed Decision - Steiner FFR allotment***

The terms and conditions of the grazing permit for the Steiner FFR allotment would be as follows in Table LVST-10.

**Table LVST-10:** Steiner FFR allotment Mandatory and Other Terms and Conditions

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00613 Steiner FFR	98	Cattle	4/1	4/30	100	Active	98

**Terms and conditions:**

1. The number of livestock and season of use on the fenced federal range (FFR) allotment #0613 are at your discretion.
2. Turnout is subject to the Boise District range readiness criteria.
3. Your certified actual use report is due within 15 days of completing your authorized annual grazing use.
4. Salt and/or supplement shall not be placed within one-quarter (1/4)-mile of springs, streams, meadows, aspen stands, playas, and water developments.
5. Changes to the scheduled use require prior approval.
6. Trailing activities must be coordinated with the BLM prior to initiation. A trailing permit or similar authorization may be required prior to crossing public lands.
7. Livestock enclosures located within your grazing allotments are closed to all domestic grazing use.
8. Range improvements must be maintained in accordance with the cooperative agreements and range improvement permits in which you are a signatory or assignee. All maintenance of range improvements within wilderness study areas requires prior consultation with the authorized officer.
9. All appropriate documentation regarding base property leases, land offered for exchange-of-use, and livestock control agreements must be approved prior to turnout. Leases of land and/or livestock must be notarized prior to submission and be in compliance with Boise District policy.
10. Failure to pay the grazing bill within 15 days of the due date specified shall result in a late fee assessment of \$25.00 or 10 percent of the grazing bill, whichever is greater, but not to exceed \$250.00. Payment made later than 15 days after the due date shall include the appropriate late fee assessment. Failure to make payment within 30 days may be a violation of 43 CFR 4140.1(B)(1) and shall result in action by the authorized officer under 43 CFR 4150.1 and 4160.1.
11. Livestock grazing will be in accordance with your allotment grazing schematic(s). Changes

- in scheduled pasture use dates will require prior authorization.
12. Utilization may not exceed 50 percent of the current year's growth.

***Notes on the Terms and Conditions***

You will be offered a grazing permit for a term of 10 years for the Steiner FFR allotment for 98 AUMs and zero suspension AUMs (Table LVST-11). Implementation of Alternative 2 will result no reduction from the 98 AUMs on the existing permit. The number of livestock and season of use is flexible, as outlined permit Term and Condition #1, provided all Terms and Conditions are met.

**Table LVST-11:** Permitted grazing use within the Steiner FFR allotment with implementation of the Proposed Action

Active Use	Suspension	Permitted Use
98 AUMs	0 AUMs	98 AUMs

**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 both the Louisa Creek and Steiner FFR 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 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment. I have made this selection for a variety of reasons, but most importantly because these alternatives 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 Louisa Creek and Steiner FFR allotments meeting or making significant progress toward meeting the resource objectives of the ORMP and the Idaho S&Gs, where they are currently not met due to livestock management practices.

***Issues Addressed<sup>5</sup>***

Earlier in this decision I outlined the major issues that drove the analysis and decision making process for the Louisa Creek and Steiner FFR allotments. I want you to know that I considered

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<sup>5</sup> For more detailed discussion on environmental consequences of the proposed actions, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.3.10.2.3 and Section 3.3.17.2.3

each alternative in light of the specific issues raised in conjunction with these allotments before I made my decision. My selection of Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment was due in large part to my understanding that this selection best addressed those issues, given the BLM's legal and land management obligations.<sup>16</sup>

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

### Louisa Creek

Under Alternative 3, the season of use will be limited to exclude grazing during the active growing season (5/1 to 7/15) in 1 of 3 years. The intensity of grazing use will also be limited to not exceed 20 % at the end of the active growing season when grazing is authorized between 5/1 and 7/15, which will benefit native deep-rooted perennial grasses. Additionally, a reduction in the number of cattle that graze within the allotment, resulting in an allotment-wide stocking rate of approximately 10 acres per AUM compared to the current permit at 5.3 acres per AUM, which will result in a reduction in the intensity of grazing use occurring in all pastures. The reduced intensity of grazing use, especially when that use occurs during the active growing season, will provide greater opportunity for cool-season bunchgrass plants to

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<sup>16</sup> As you know, your allotments are 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.

complete their annual growth cycle in the absence of grazing or with limited grazing and the need to regrow. In combination, limits to the intensity of grazing use in all season and 1 in 3 years of exclusion of use during the active growing season will allow cool-season bunchgrass species an opportunity to regain or at least maintain health and vigor, as detailed in Appendix E.

Livestock grazing seasons of use and livestock numbers authorized in the allotment with implementation of Alternative 3 will not contribute to either improvement or continued failure to meet Standard 4 in areas where the standard is not being met due to juniper encroachment into sagebrush steppe vegetation communities. Other than the indirect effect from removal of fine fuels that support the spread of wildfire, livestock grazing will have little influence on juniper encroachment.

Under Alternative 3, progress toward meeting Standard 4 will not occur, given the continued expansion and dominance by juniper into sagebrush steppe vegetation types. Additionally, the ORMP objective to improve unsatisfactory vegetation health and condition is limited, although implementation of the Alternative 3 grazing schedule that provides deferment of grazing use until after the active growing season in all pastures during one of each three years will provide opportunity for the current vegetation communities to express aspects of potential within the limits of the existing vegetation composition that includes juniper.

#### Steiner FFR

The season of use identified under Alternative 2 is between April 1 and April 30, although flexibility provided in terms and conditions of the permit will continue to allow a season of use at the discretion of the permittee. The permittee has recently used pasture 1 of the allotment beginning in late April and extending through late November, including the active growing season for cool-season bunchgrass species (5/1 to 7/15). At the same time, pasture 2 has consistently been use beginning in early July, including the later portion of the active growing season. It is assumed that this season of use will be continued. Impacts to cool-season bunchgrass species from annual active growing season use will continue to impact health and vigor of bunchgrass species and forbs as detailed in Appendix E. Although Standard 4 was not met in the allotment, juniper encroachment was identified as the causal factor.

On land within the allotment that includes significant private land ownership (no more than 22 percent public land), additional discretion provided to the permittee without restrictions in livestock numbers has not resulted in recorded utilization exceeding the maximum allowable limit of 50 percent set in the ORMP. It is assumed that this practice will be continued, leading to a conclusion that although the season of use includes grazing during the active growing season, the intensity of use will continue to be held to a level that does not contribute toward not meeting Standard 4.

Although Standard 4 will continue to not be met in the allotment due to juniper encroachment, implementation of livestock management practices under Alternative 2 will not be a contributing factor toward failure to meet the standard. Similarly, the ORMP objective to improve unsatisfactory vegetation health and condition will not be met.

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

Louisa Creek

Alternative 3 will provide 1 out of 3 years of deferment from spring grazing for all pastures but will increase the amount of use that pasture 1 currently receives with a 2-year rotation. While the 3-year rotation will remove two deferment years for pasture 1 over the life of the permit, pastures 2 and 6 will gain extra rest years. Pasture 3 will see an earlier on-date for summer grazing although additional upland utilization limits will be implemented to mitigate the effects of grazing during the critical growing season. The intensity of grazing use will not exceed 20 percent at the end of the active growing season when grazing is authorized between 5/1 and 7/15, which will benefit native deep-rooted perennial grasses.

The main benefits of Alternative 3 will arise from a decrease in grazing intensity, which results from lower livestock numbers, lower active AUMs, and adjusted stocking rates that will contribute to a reduction in physical impacts to soils during the wettest period of the year and ease utilization of plants. This is expected to adequately offset the loss of two deferment years in pasture 1 over the life of the permit and positively affect all other pastures.

On the other hand, soils will continue to be susceptible to reduced stability and altered soil infiltration and water holding capacity over time due to the spread of juniper. As a whole, progress toward maintaining, meeting, and improving soil and hydrologic function under Alternative 3 will occur in all pastures as a result of restrictions to seasons and intensities of grazing use, although juniper encroachment will continue to limit meeting Standard 1 and ORMP objectives.

Steiner FFR

Because the permittee retains the flexibility to change grazing management at his discretion under Alternative 2, livestock grazing in the Steiner FFR allotment may include yearly spring grazing in both pastures which will increase physical impacts during the wettest period, although Boise District range readiness criteria will have to be met, which will curtail soil impacts during this timeframe. Critical growing season use will take place and influence the active growth of native plant communities that provide soil stability. However, all pastures of the allotment are currently meeting standards, with likelihood to continue meeting standards and maintaining watershed health, although soils will be susceptible to reduced stability and altered soil infiltration and water holding capacity over time due to the spread of juniper. As a whole, the allotment is expected to maintain soil and hydrologic function under Alternative 2 when compared to the current condition.

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

Louisa Creek

Livestock grazing seasons of use and livestock numbers authorized in the allotment with implementation of Alternative 3 will not contribute to either improvement or continued failure to meet Standard 4 in areas where the standard is not being met due to juniper encroachment into sagebrush steppe vegetation communities. Other than the indirect effect from removal of fine fuels that support the spread of wildfire, livestock grazing will have little influence on juniper encroachment.

Under Alternative 3, progress toward meeting Standard 4 will not occur, given the continued expansion and dominance by juniper into sagebrush steppe vegetation types. Additionally, the ORMP objective to improve unsatisfactory vegetation health and condition is limited, although implementation of the Alternative 3 grazing schedule avoiding grazing use during the active growing season in all pastures during one in three years. This will provide opportunity for current vegetation communities to express aspects of potential within the limits of the existing vegetation composition that includes juniper.

Upland vegetation in pastures 1, 2, and 6 will maintain vigor and reproductive capability. However cheatgrass and juniper will continue to increase within these pastures and will eventually limit the vigor and reduce the abundance of shrub steppe vegetation. Upland vegetation in pastures 3, 4, and 5 is already limited by juniper encroachment and will continue to decrease in vigor and abundance under current conditions as juniper continues to increase in density. Habitat for woodland species will increase as the shrub steppe habitat decreases.

#### Steiner FFR

Although Standard 4 will continue to not be met in the allotment due to juniper encroachment, implementation of livestock management practices under Alternative 2 will not be a contributing factor toward failure to meet the standard. Similarly, the ORMP objective to improve unsatisfactory vegetation health and condition will not be met.

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

#### Louisa Creek

Noxious weeds are known to exist in the Louisa Creek allotment and although undiscovered noxious weeds may exist, noxious weed control is ongoing. Although Alternatives 4 and 5 would further reduce the potential for livestock to introduce and spread invasive and non-native annual species as compared to Alternative 3, 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.

#### Steiner FFR

No known populations of noxious weeds exist in the Steiner FFR allotment, although undiscovered noxious weeds may exist. Although Alternatives 3, 4, and 5 would further reduce the potential for livestock to introduce and spread invasive and non-native annual species as compared to Alternative 2, 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.

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

#### Louisa Creek

Under Alternative 3, pasture 1 of the Louisa Creek allotment will be available to grazing during the spring for 2 years, and during the fall the third year of a 3-year rotation. Pastures 2 and 6 will be available during the spring for one year, and during the fall for 2 years. Pasture 3 will be grazed in the early summer one year, and during the summer for 2 years. Consequently, within the

allotment, 4.1 miles of perennial stream, 23.0 miles of intermittent/ ephemeral stream, and one spring will be affected by the impacts associated with the spring, summer, and fall seasons of grazing. Pastures 1-3 and 6 contain the riparian areas. Recent actual use reported indicates that pastures 1, 2, and 6 of the allotment have primarily been used during the spring and fall months, and pasture 3 has been used during the summer and fall, and it is in these pastures that the riparian Standards are not being met due to current livestock management.

Under Alternative 3, the pastures that contain the riparian areas will be used during the same seasons as the current permit. However, the alternative proposes a 43 percent reduction in active AUMs, which will be accomplished through deferment, compared to the current situation (1,028 AUMs vs. 1,798 AUMs). Other mandatory terms and conditions of the permit under this alternative will include measures (stubble height, woody browse, and bank alteration) that will reduce impacts associated with the riparian areas condition. Monitoring is required within pasture 3 during the year when use will occur during the riparian constraint period, and will add assurances that Standards will make progress toward being met. Therefore, the allotment will make progress toward meeting the riparian-wetland Standards under this alternative.

#### Steiner FFR

Under Alternative 2, the Steiner FFR allotment will be available for grazing year-round annually, and use will be at your discretion. Consequently, 2.6 miles of perennial stream and 5.3 miles of intermittent/ephemeral stream will be affected by the impacts associated with all-season grazing. Pasture 1, which contains riparian areas, has primarily been used during the spring, summer, and fall months, and the riparian standards are being met. Since the allotment will be used during the same seasons and under the same terms as the current situation, impacts will continue; however, the allotment will continue to meet the riparian-wetland Standards under this alternative.

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

#### Louisa Creek and Steiner FFR

Special status plants are not known to occur in either the Louisa Creek or the Steiner FFR allotments.

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

#### Louisa Creek

Sage-grouse habitat will be maintained in pastures 1, 2, and 6, but eventual encroachment by juniper and increases in abundance of cheatgrass will reduce the vigor and abundance of sagebrush, forbs and deep-rooted perennial grasses. This will result in decreased cover and forage for sage-grouse and reduced nest success and individual survivorship. Pastures 3, 4, and 5 are already dominated by juniper encroachment, and habitat for sage-grouse is limited. Under Alternative 3, grazing practices will not impede juniper encroachment, and increased juniper cover will continue to reduce the amount and quality of sage-grouse habitat in the allotment.

Additional upland and riparian habitat enhancement will occur overall because of reduced grazing intensity due to the reduction in AUMs. However, juniper encroachment will continue to prevent the Louisa Creek allotment from meeting Standard 8.

### Steiner FFR

Under Alternative 2, grazing practices will remain the same, and conditions for upland and riparian habitats will be expected to stay in their present state or continue to follow their current trend. The Steiner FFR allotment will not make progress toward meeting Standard 8 in the upland habitats due to juniper encroachment, but riparian habitats will meet Standard 8.

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

### Louisa Creek and Steiner FFR

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 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment will not significantly alter the BLM's ability to fight wildfire in the area.

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

The selected alternatives retain a level of grazing use that reduces the accumulation of fine fuels and thus will lessen the spread of large wildfires when fire weather conditions are less extreme. More importantly, they are designed to benefit and promote the health and vigor of native perennial species on the allotments, 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.*

### Louisa Creek and Steiner FFR

Climate change is another factor I considered in selecting Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment. Climate change is a stressor that can reduce the long-term competitive advantage of native perennial plant species. Since livestock management practices can also stress sensitive perennial species in arid sagebrush steppe environments, I considered the issues together, albeit based on the limited information available on how they relate in actual range conditions. Although the factors that contribute to climate

change are complex, long-term, and not fully understood, the opportunity to provide resistance and resilience within native perennial vegetation communities from livestock grazing induced impacts is within the scope of this decision. The selection of these alternatives combines 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.

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

### Louisa Creek and Steiner FFR

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 it 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 Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment in large part because those selections accomplish those latter goals.

Over the long term, your grazing operation relies upon maintenance of the natural resources, including productive and healthy rangelands capable of supplying a reliable forage base. Selection of an alternative based on unsustainable grazing practices that do not meet rangeland health standards would result in less reliable amounts of forage over the long-term, in addition to reducing economic opportunities derived from healthy ecosystems and alternate socio-economic resources, such as recreation, that rely on healthy, functional and aesthetically pleasing open spaces and wildlife habitats. Changes to management on the Louisa Creek will be made because the allotment is failing Standards 2, 3, 7, and 8 because of current livestock management. The Steiner FFR is not failing any Standard due to current livestock management; therefore Alternative 2, developed using your application, will be selected for management of this allotment. Both allotments are failing Standard 4 (Native Plant Communities) because of juniper encroachment; alternative selection will have no bearing on moving these allotments toward meeting the standard.

I have considered the range of issues at the allotment level, including the social and economic impacts that result from modifying grazing authorizations, and have avoided any reduction in grazing use levels in your allotments where current levels are compatible with meeting rangeland health standards and ORMP objectives. It is my proposed decision to implement these alternatives to meet resource function and sustainability.

### ***Additional Rationale***

Much thought and effort went into developing grazing management that is responsive to the Louisa Creek and Steiner FFR allotments' specific resource needs, geography, and size. We attempted to address all resource and operational concerns and the resource and stewardship requirements mandated to the BLM. We recognize that each allotment has different ecology and management capacity due to the size and location/topography; all attempts to coordinate grazing throughout both allotments were made by me and my staff, with input from you and the interested public, with

these features in mind. I recognize the difficulty of not only responding to the (mandated) needs to protect the resources, but recognize as well the needs and capability that you, the permittee, have. I believe I have balanced the 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 these allotments; however, based on all the information used in developing my decision and the condition of these allotments, I believe that the BLM can meet resource objectives and still allow grazing on these allotments. In selecting Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment rather than Alternative 5, I especially considered (1) BLM's ability to meet resource objectives using the selected alternatives, (2) the impact of implementation of Alternative 5 on your operations and on regional economic activity, and (3) your past performance under previous permits. By implementing Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment, the resource issues identified will be addressed. Declining to authorize grazing for a ten-year period is not the management decision most appropriate at this time in light of these factors.

### **Finding of No Significant Impact**

A finding of no significant impact (FONSI) was signed on November 20, 2013 and concluded that the proposed decision to implement Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment 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-B030-2013-0021-EA is available on the web at:

[http://www.blm.gov/id/st/en/prog/nepa\\_register/owvhcc\\_grazing\\_group/grazing\\_permit\\_renewal1.htm](http://www.blm.gov/id/st/en/prog/nepa_register/owvhcc_grazing_group/grazing_permit_renewal1.htm)

### **Conclusion**

In conclusion, it is my decision to select Alternative 3 for the Louisa Creek allotment and Alternative 2 for the Steiner FFR allotment because livestock management practices under these selections best meet the ORMP objectives allotment-wide and the Idaho S&Gs consistent with the projected ability of BLM to oversee grazing on these allotments over the next 10 years.

On the Louisa Creek allotment, Alternatives 1 and 2 would implement livestock management practices that would allow a continued failure to meet objectives and standards related to riparian resources, stream channels and water quality. The implementation of Alternative 3 will allow for recovery and significant progress or attainment of these standards in the Louisa Creek allotment.

On the Steiner FFR allotment, no standards are failing to be met due to current livestock grazing management; therefore Alternative 2 was chosen. Where resource issues are not due to current livestock management, I see no reason for you to be required to change management on the allotment.

On both allotments, where standards are not met due to juniper encroachment, these standards will continue to not be met. No change in grazing management will alter the ability of the allotments to meet standards that are failing due to juniper encroachment.

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 selected alternatives lead me to believe elimination of livestock grazing from the Louisa Creek and Steiner FFR allotments is unnecessary at this point.

### **Authority**

The authorities under which this decision is being issued include the Taylor Grazing Act of 1934, as amended, and the Federal Land Policy and Management Act of 1976, as promulgated through Title 43 of the Code of Federal Regulations (CFR) Subpart 4100 Grazing Administration - Exclusive of Alaska (2005). My decision is issued under the following specific regulations:

- 4100.0-8 Land use plans. The ORMP designates the Louisa Creek and Steiner FFR allotments as available for livestock grazing;
- 4130.2 Grazing permits or leases. Grazing permits may be issued to qualified applicants on lands designated as available for livestock grazing. Grazing permits shall be issued for a term of 10 years unless the authorized officer determines that a lesser term is in the best interest of sound management;
- 4130.3 Terms and conditions. Grazing permits must specify the 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 make significant progress toward achieving rangeland health.

### **Right of Protest and/or Appeal**

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

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

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

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

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

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

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

Boise Field Solicitor's Office  
University Plaza  
960 Broadway Ave., Suite 400  
Boise, Idaho 83706

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

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

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

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

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

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

Sincerely,



Loretta V. Chandler  
Field Manager  
Owyhee Field Office

### Works Cited

- USDI BLM. (1999). *Owyhee Resource Management Plan*. Marsing, ID.  
 USDI BLM. (2013a). *Amended Rangeland Health Assessments for Lone Tree (0587) and Louisa Creek (0601) Allotments, 2013 Supplement*. Marsing, ID.  
 USDI BLM. (2013b). *Steiner FFR (0613) 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	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 Heughlins	10370 W Landmark Ct.	Boise	ID	83704	16
Jaca Livestock	Elias Jaca	817 Blaine Ave.	Nampa	ID	83651	17

Company	Name		Address	City	ST	Zip	#
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 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 <sup>th</sup> Floor	San Francisco	CA	94104	44

Company	Name		Address	City	ST	Zip	#
Office of Species Conservation	Cally	Younger	304 N. 8 <sup>th</sup> 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
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

Company	Name		Address	City	ST	Zip	#
	Marti & Susan	Jaca	21127 Upper Reynolds Cr. Rd.	Murphy	ID	83650	68
Lequerica & Sons Inc.	Tim	Lequerica	PO Box 113	Arock	OR	97902	69
	Charles	Lyons	11408 Hwy 20	Mountain Home	ID	83647	70
	Craig & Georgene	Moore	P.O. Box 14	Melba	ID	83641	71
	Soctt & Sherri	Nicholson	P.O. Box 690	Meridian	ID	83680	72
	Joseph	Parkinson	123 W. Highland View Dr.	Boise	ID	83702	73
Zion First National Bank	Bertha	Scallon	500 5th St.	Ames	IA	50010	74
	Elmer	Stahl	17965 Oreana Loop Rd.	Murphy	ID	83650	75
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