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In Reply Refer To:
4160 ID130

January 24, 2013

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Craig and Georgene Moore
P.O. Box 14
Melba, ID 83641

Notice of Field Manager's Proposed Decision for the Moore FFR Allotment

Dear Craig and Georgene Moore:

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

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

The BLM mailed you a letter on May 25, 2011, summarizing progress and future actions to comply with the 2008 Stipulated Settlement Agreement in renewing your grazing permit. That letter also requested that you complete an application for renewal of your permit to graze livestock in the Moore FFR allotment. You submitted an application for renewal of this grazing permit, received by the BLM on June 12, 2011. In late May 2013, you met with BLM to discuss allotment conditions, objectives, and livestock management. Additionally, you were asked during the 2013 meetings to update the previously submitted application. Following discussion with the BLM in 2013, you provided an updated application for permit renewal, received by the BLM on May 20, 2013.

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 Moore FFR allotment is one of 20 allotments within Group 3, the Toy Mountain Group. The scoping 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)

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

and the Owyhee Resource Management Plan (ORMP) (USDI BLM, 1999). The scoping document was also presented to the Shoshone-Paiute Tribe and Owyhee County Commissioners.

The scoping outreach served to request additional resources and monitoring information that could help the BLM to complete the permit renewal process and helped develop grazing management alternatives for three grazing permit renewal Environmental Assessments (EA), including the Toy Mountain Group EA #DOI-BLM-ID-B030-2013-0021-EA. The Final Toy Mountain Group EA, which was published on November 26, 2013, incorporates by reference the Jump Creek, Succor Creek, and Cow Creek Watersheds Grazing Permit Renewal Final EIS # DOI-BLM-ID-B030-2012-0014-EIS and the analysis contained therein. This Proposed Decision incorporates by reference the analysis contained in those documents (see Appendix K).

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

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

I am now prepared to issue a Proposed Decision to renew your permit to graze livestock within the Moore FFR allotment. Upon implementation of the decision, your permit to graze livestock on this allotment will be fully processed using the revisions to the grazing regulations³ promulgated in 1995, the Idaho S&Gs adopted in 1997, and the ORMP adopted in 1999.

This Proposed Decision will:

- Describe current conditions and issues on the allotment;
- Briefly discuss the alternative grazing management schemes that the BLM considered in the EA;
- Respond to the application for grazing permit renewal for use in the Moore FFR allotment;
- Outline my proposed decision to select Alternative 3; and
- Explain the reasons for making this decision.

Background

Allotment Setting

The Moore FFR allotment is located approximately 7 miles south of Triangle, Idaho (Map 1). The allotment includes 327 acres of public land (38 percent), 22 acres of state land (3 percent), and 501 acres of private land (59 percent).⁴ The ORMP categorized the Moore FFR allotment as a Custodial (C) category

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

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

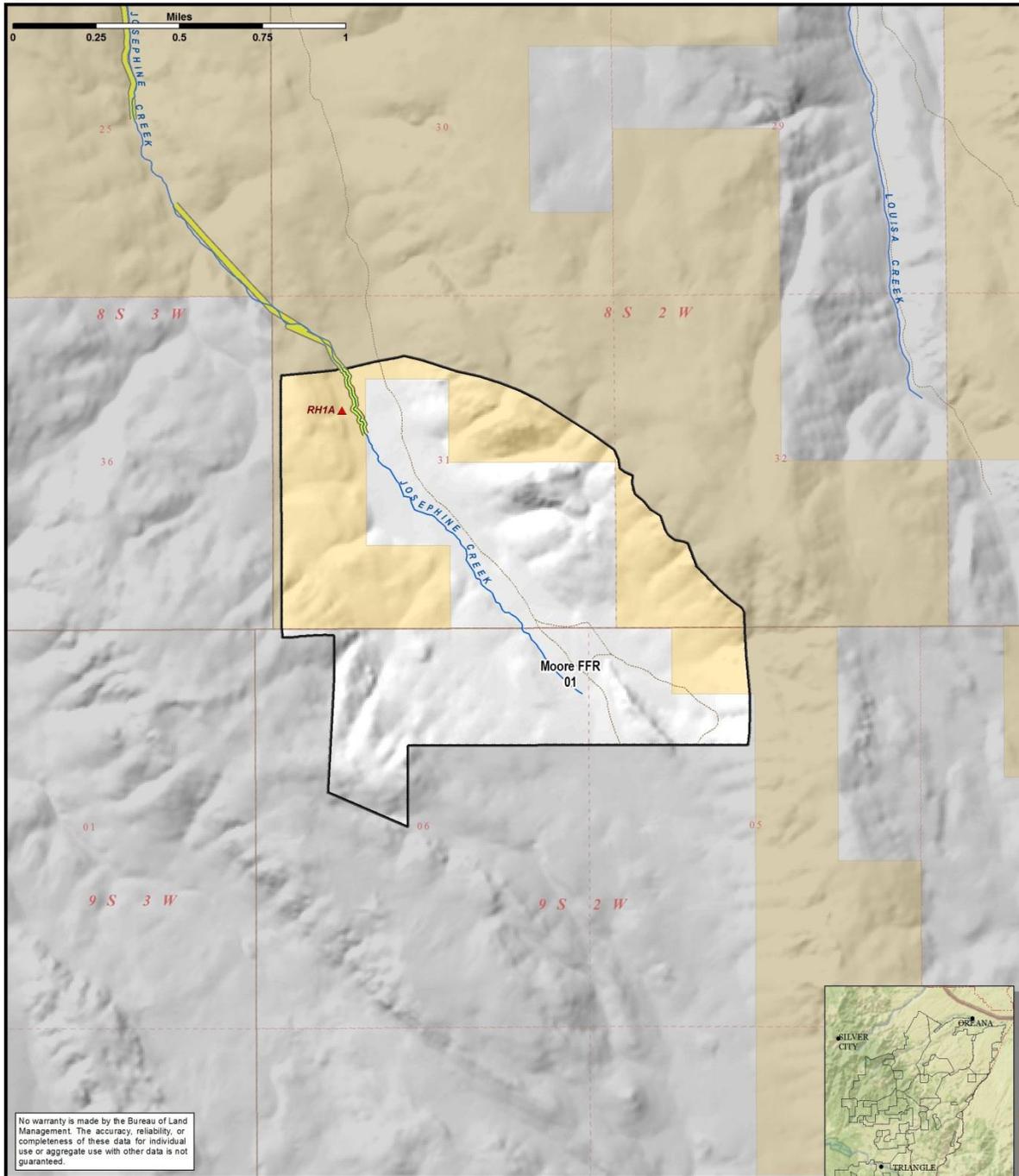
⁴ Regarding allotments with FFR in their name: the BLM's legal and regulatory management responsibilities for public land resources are not attenuated or reduced by the presence of limited public land acreage within larger parcels of non-federal ownership.

allotment. In addition to allocating livestock grazing within the Moore FFR allotment, the ORMP identified issues associated with management activities with a listing of resource concerns and applicable ORMP resource objectives. Resource concerns identified include the ecological condition of vegetation communities, noxious weeds, perennial surface water, riparian/wetland ecosystems, and special status species (reband trout).

The elevation of the Moore FFR allotment ranges from approximately 5,700 feet to 6,200 feet. The allotment lies within the Owyhee Uplands, a sagebrush steppe semi-arid landscape of shrubs and cool-season bunchgrasses where native vegetation communities are diverse. Limited precipitation with cold winters and dry summers constrain plant and animal communities. Primary vegetation types are dominated by big sagebrush and low sagebrush as the shrub layer, with native perennial bunchgrasses and forbs in the understories.



Map 1: Moore FFR (00606) Allotment



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

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



1:24,000

Current Grazing Authorization

One existing grazing permit authorizes livestock grazing use of the Moore FFR allotment with a current total permitted use of 48 AUMs, all of which are active use and none are in suspension. The terms and conditions of the existing grazing permit are as follow in Table LVST-1:

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

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00606 Moore FFR	47	Cattle	12/1	12/31	100	Active	48

Terms and conditions:

1. The number of livestock and season of use on the fenced federal range (FFR) allotment #00606 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.

Actual use annually submitted by you for the Moore FFR allotment in recent years most often identifies use between June 1 and November 7, with approximately 43 head of cattle on public, state, and private land.⁵

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

⁵ The Moore FFR allotment includes 850 acres, of which 38 percent (327 acres) is public land.

result of grazing use from early summer through the fall and with fewer AUM grazed from public land, when prorated for the land status.

Resource Conditions

The BLM evaluated grazing practices and conditions in the Moore FFR allotment through 2013. The determination document for the allotment was provided to the public with the preliminary EA. The Evaluation and Determination documents concluded that Standards 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain), 4 (Native Plant Communities), and 8 (Threatened and Endangered Plants and Animals) of the Idaho S&Gs are not being met in the Moore FFR Allotment, whereas Standard 1 (Watersheds) is met and Standards 5 (Seedings), 6 (Exotic Plant Communities, other than Seedings), and 7 (Water Quality) are not applicable to resources present within the allotment. Current livestock grazing management practices are significant factors in not meeting Standards 2, 3, and 8, whereas current livestock management practices are not significant factors in the failure to meet Standard 4.

Vegetation - Uplands

The Idaho Standards for Rangeland Health Standard 4 (Native Plant Communities) is not met in the Moore FFR allotment. One RHA was completed in 2001 and concluded that the biotic integrity of the site departed from reference site conditions in the none-to-slight category. The indicator for invasive plants identified the presence of juniper. As noted from photos accompanying that assessment and 2011 NAIP imagery (USDA FSA, 2011), juniper occurs at a high density on most public land portions of the allotment. The ecological site description for the public land portion of the allotment, the Loamy 13-16” ARTRV/PSSP-FEID site, identifies juniper as an invasive species that, when dominant, results in a new state requiring management inputs to restore ecological function of the reference site mountain big sagebrush/bunchgrass state. Juniper encroachment of the public land portions of the allotment lead to a finding that Standard 4 is not met due to altered fire regimes.

As a result, the Moore FFR allotment is not meeting Standard 4 because juniper encroachment into vegetation communities is competing with native perennial shrub, bunchgrass, and forb species. Vegetation communities of the Moore FFR allotment should not include juniper in excess of a few scattered trees. Fire frequency that is altered from natural disturbance regimes contribute to conditions that lead to a failure to meet the standard due to juniper encroachment.

A conclusion whether the ORMP objective to improve vegetation health/condition is met cannot be reached in the absence of trend data. Reported annual grazing use that includes grazing late during the active growing season annually is a practice that may limit progress toward meeting the ORMP vegetation objective.⁶

Watersheds

Although watershed indicators show very little departure from expected conditions, the Moore FFR allotment is labeled as at-risk for juniper encroachment and juniper occurs at a high density on most public land portions of the allotment. Over time, this can alter soil stability and hydrologic function; however, the existing plant community and soil conditions remain adequate to provide for proper nutrient and hydrologic cycling, and energy flow. Current livestock management is compatible with attainment of Standard 1.⁷

⁶ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.1, Section 3.3.12.1.1, and Appendix E.

⁷ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.2 and Section 3.3.12.1.2.

Water Resources and Riparian/Wetland Areas

Standards 2 and 3 are not being met in the Moore FFR allotment due to current livestock management practices. Approximately 0.25 mile of Josephine Creek traverses BLM lands in the Moore FFR allotment. The reach was functional at-risk (FAR) in 2013 because there was shearing of the riparian soil that is leading to the drying of the riparian zone and the encroachment of upland species. Additionally, the channel is incised and erosion is occurring.

Current IDEQ information identifies that none of the streams on BLM lands within the Moore FFR allotment has been assessed. Therefore, although short reaches of stream are present, Standard 7 is not applicable in the allotment. For IDEQ water quality information associated with the Moore FFR allotment, see table RIPN-3 within the EA.⁸

Special Status Plants

No populations of special status plant species are known to occur in the Moore FFR allotment.⁹

Wildlife/Wildlife Habitats and Special Status Animals

Standard 8 for wildlife is not being met in the Moore FFR allotment. Upland and riparian habitats are not providing adequate conditions for many shrub-obligate and riparian dependent species

Moore FFR allotment consists of one pasture and the dominant upland habitat types are shrub steppe and conifer woodlands. Upland habitats are not meeting Standard 8, primarily due to the conversion of shrub steppe habitats to woodland/forest habitats. 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 reference state plant communities and condition for the ecological sites that predominate within the allotment.

Riparian areas (Josephine Creek) within the allotment are not in proper functioning condition. The reach of Josephine Creek on BLM lands is not providing adequate breeding and foraging conditions for many dependent wildlife species, due to a lack of structural diversity, channel incision and erosion, and de-watering of the riparian zone due to soil shearing. 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 in riparian habitats.¹⁰

Guidelines for Livestock Grazing Management

In addition to a discussion of rangeland health standards, the BLM's 2013 Moore FFR allotment Determination (USDI BLM, 2013) identified that current grazing management practices do not conform with the applicable Livestock Grazing Management Guidelines 5, 7, 8, and 12 for the Standards not met. Guidelines 5, 7, 8, and 12 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 energy dissipation,

⁸ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.3 and Section 3.3.12.1.3.

⁹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.4 and Section 3.3.12.1.4.

¹⁰ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.1.5 and Section 3.3.12.1.5.

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

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

Issues

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

- Issue 1: *Improve upland vegetation plant communities, and in particular, reverse the shift from desirable to undesirable native plant communities.*
- Issue 2: *Improve watershed conditions within upland sites.*
- Issue 3: *Limit juniper encroachment into shrub-steppe vegetation types.*
- Issue 4: *Prevent introduction and spread of noxious and invasive annual species (e.g., cheatgrass).*
- Issue 5: *Improve riparian vegetation and stream-bank stability associated with streams and springs/seeps.*
- Issue 6: *Protect special status plants and improve the habitats supporting special status plants.*
- Issue 7: *Improve wildlife habitats, and habitats necessary to meet objectives for sagebrush-dependent species, including sage-grouse.*
- Issue 8: *Consider whether grazing can be used to limit wildfire.*
- Issue 9: *Consider the two-fold issue of climate change and its relationship to the proposed federal action of renewing grazing permits. Livestock grazing in Owyhee County contributes CO₂ and methane emissions to the earth's atmosphere. In addition, climate change, itself a stressor on the sagebrush-steppe semi-arid ecosystem found in the Owyhee Uplands can, when found in conjunction with cattle grazing, further stress the ecosystem's vegetation.*
- Issue 10: *Consider impacts to regional socioeconomic activity generated by livestock production.*

Analysis of Alternative Actions

Based on the current condition of the Moore FFR allotment and the issues identified above, the BLM considered and analyzed a number of alternative livestock management schemes in the EA to ensure that

any renewed grazing permit would result in the maintenance or improvement of conditions on the allotment. Specifically, the BLM analyzed five alternatives in detail, identified a number of actions common to all alternatives, and considered but did not analyze in detail a number of other possible actions.¹¹ The BLM considered the following alternatives in detail:

- **Alternative 1 – Current Situation:** The BLM would renew the livestock grazing permit for use in the Moore FFR allotment consistent with the summarized actions that have led to the current conditions. The same terms and conditions of the existing permit would be included in the permit offered. The number of livestock and season of use on the allotment, an allotment that includes a high percentage of private land, would be unchanged from the existing permit and at the discretion of the permittee. Permitted use in the Moore FFR allotment would be unchanged from the existing permit with 48 AUMs of active authorized use and 0 AUMs of suspension AUMs.¹²
- **Alternative 2 – Applicant’s Proposed Action:** The BLM would renew the livestock grazing permit for use in the Moore FFR allotment in accordance with terms and conditions of the existing permit and as modified by the application received by BLM. The number of livestock and season of use on the allotment would be at the discretion of the permittee. Permitted use in the Moore FFR allotment would be unchanged from the existing permit with an authorized active use of 48 AUMs and suspension of 0 AUMs.¹³
- **Alternative 3:** The BLM would renew the livestock grazing permit for use in the Moore FFR allotment with terms and conditions that constrain seasons, intensities, duration, and frequency of grazing use. While seasons of grazing use would be constrained, livestock numbers would be defined at the permittee’s discretion. Permitted use in the Moore FFR allotment would be unchanged from the existing permit with an authorized active use of 48 AUMs and suspension of 0 AUMs.¹⁴
- **Alternative 4:** The BLM would renew the livestock grazing permit for use in the Moore FFR allotment with terms and conditions that constrain seasons, intensities, duration, and frequency of grazing use that would be more limiting than those under Alternative 3. In addition to defining seasons of authorized use, livestock numbers authorized within the allotment would be defined. Permitted use in the Moore FFR allotment would be reduced from the existing permit with an authorized active use of 40 AUMs and suspension of 0 AUMs.¹⁵
- **Alternative 5 – No Grazing:** No grazing would be authorized on public lands within the allotment for a term of 10 years. The application for grazing permit renewal would be denied and no grazing permit would be offered.

¹¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 2 and Section 2.4.12.

¹² For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.12.1

¹³ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.12.2

¹⁴ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.12.3

¹⁵ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0021-EA Section 2.4.12.4

The Preliminary EA detailing the above alternatives was made available for public review and comment for a 15-day period ending November 12, 2013. Comments that were received were used to complete the EA and draft a Finding of No Significant Impact (FONSI).

Proposed Decision

After considering the current grazing practices, the current conditions of the natural resources, and the alternatives and analysis in the EA, comments received from you and other interested publics, as well as other information, it is my proposed decision to renew your grazing permit for 10 years consistent with the terms and conditions under Alternative 3. Implementation of Alternative 3 over the next 10 years will allow the Moore FFR allotment to continue meeting or making significant progress toward meeting the Idaho S&Gs, while also moving toward achieving the resource objectives outlined in the ORMP. Specifically, Alternative 3 will allow progress to be made toward meeting Standards 2, 3, and 8.

You will be offered a permit for a term of 10 years with an active use of 48 AUMs as outlined in Table LVST-2. Authorized active use in the Moore FFR allotment will be unchanged from the existing permit.

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

Active Use	Suspension	Permitted Use
48 AUMs	0 AUMs	48 AUMs

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

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

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00606 Moore FFR	9	Cattle	6/1	11/10	100	Active	48

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

1. Dates of availability of the Moore FFR allotment (00606) and limitations to the intensity of grazing use will be in accordance with the grazing schedule identified in the final decision of the Owyhee Field Office Manager dated _____ (see Table LVST-4). Changes to the scheduled use require approval by the authorized officer, consistent with Standard Terms and Conditions.
2. The number of livestock authorized on the Moore FFR allotment (0606) is at the permittee's discretion, as long as authorized active use of 48 AUMs from public lands is not exceeded.

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. Use of supplements other than the standard salt or mineral block on public land requires prior approval from the authorized officer.

4. 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.
5. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use.
6. Range improvements must be maintained in accordance with the cooperative agreement and range improvement permit in which you are a signatory or assignee. All maintenance of range improvements within designated Wilderness requires prior consultation with the authorized officer.
7. All appropriate documentation regarding base property leases, lands offered for exchange-of-use, and livestock control agreements must be approved prior to turn out. Leases of land and/or livestock must be notarized prior to submission and be in compliance with Boise District Policy.
8. Utilization may not exceed 50 percent of the current year's growth.

The grazing schedule for the Moore FFR allotment, identified in Table LVST-4, will be authorized and its implementation will be included as a term and condition of the permit offered. Livestock numbers authorized to graze within the allotment are at your discretion, so long as 48 AUMs of authorized active AUMs are not exceeded from the public land portions of the allotment.

Table LVST-4: Moore FFR allotment grazing schedule (dates when grazing can occur)

Pasture	Year 1	Year 2	Year 3
1	6/1 to 11/10 * **	6/1 to 11/10 * **	10/1 to 11/10

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

** Riparian intensity of use limited to stubble height no less than 6", woody browse use no greater than 30 percent incidence of use on most recent year's lead growth, and bank alteration no greater than 10 percent at the end of the riparian growing season (9/30)

Rationale

Record of Performance

Pursuant to 43 CFR § 4110.1(b)(1), a grazing permit may not be renewed if the permittee seeking renewal has an unsatisfactory record of performance with respect to its last grazing permit. Accordingly, I have reviewed your record as a grazing permit holder for the Moore FFR allotment and have determined that you have a satisfactory record of performance and are a qualified applicant for the purposes of a permit renewal.

Justification for the Proposed Decision

Based on my review of EA number DOI-BLM-ID-B030-2013-0021-EA, the rangeland health assessment/evaluation, determination, and other documents in the grazing files, it is my proposed decision to select Alternative 3. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will fulfill the BLM's obligation to manage the public lands under the Federal Land Policy and Management Act's multiple use and sustained yield mandate, and will result in the Moore FFR allotment making significant progress towards meeting the resource objectives of the ORMP and the Idaho S&Gs.¹⁶

¹⁶ As you know, your allotment is part of a group of 20 allotments forming the Toy Mountain Group allotments and the larger Owyhee 68 allotments, and is the subject of a permit renewal process to be completed by December 31, 2013. The NEPA process for the Owyhee 68 consists of five EAs and an EIS. This multiple-allotment process has required me, as the Field Manager responsible for signing these grazing decisions, to look at these allotments and the other allotments analyzed in the EAs and the EIS, not just individually but as a members of a group of allotments located in a particular landscape, the BLM Owyhee Field Office. That is, while I am looking at your individual

Issues Addressed

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

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

Under Alternative 3, the season of use would be limited to exclude grazing during the active growing season (5/1 to 7/15) in 1 of 3 years. In addition, the intensity of grazing use would be limited to less than 20 percent at the end of the active growing season when grazing is authorized between 5/1 and 7/15. In combination, limits to the intensity of grazing use during the active growing season and exclusion of use during the active growing season in 1 in 3 years of would allow cool-season bunchgrass species to regain health and vigor, as detailed in Appendix E of the EA. Although Standard 4 would continue to not be met in the allotment due to altered fire regimes and subsequent juniper encroachment, action under Alternative 3 that limit the seasons and intensity of grazing use as identified above would not contribute to failure meeting the standard in the future. Similarly, the ORMP objective to improve unsatisfactory vegetation health and condition would not be met. Implementation of the Alternative 3 grazing schedule that provides growing season deferment during one of each three years would provide opportunity for the current vegetation communities to express aspects of potential within the limits of the existing vegetation composition.¹⁷

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.

¹⁷ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.1 and Section 3.3.12.2.3.1

Issue 2: Improve watershed conditions within upland sites.

Alternative 3 would provide yearly deferment from early spring grazing that would reduce physical impacts to soils during the wettest and most susceptible period. Additional benefits are provided from 1 out of 3 years of deferment from critical growing season use and from summer riparian grazing. This offers native plant communities an opportunity to improve and respond with increased soil cover, decreased bare ground, reduced susceptibility to accelerated erosion, and would lessen concentrated summer use on upland soils that surround riparian areas.

Alternative 3 also defines grazing periods and would not leave the season of use open, although livestock numbers would continue to be at the permittee's discretion. On the other hand, soils would 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 towards maintaining, meeting, and improving soil and hydrologic function proposed with Alternative 3 is therefore expected to be better as compared with Alternatives 1 and 2, though not as much as with Alternatives 4 and 5. The allotment would continue to meet Standard 1, Watersheds.¹⁸

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

As noted above under Issue 1, implementation of proper livestock management practices or the elimination of authorized livestock grazing from the Moore FFR allotment, as would occur under Alternative 5, would not change the capability for making progress toward meeting Standards where the causal factor for not meeting the Standard is altered fire regimes and juniper encroachment. Similarly, proper grazing management practices would not lead to limiting additional juniper encroachment into shrub-steppe vegetation types, except when those practices replace repeated heavy use during critical periods of the year, as occurred with historic grazing practices more than 50 years ago.¹⁹

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

In Idaho, the BLM works closely with the Idaho Department of Agriculture, Tribal governments, and county governments to combat noxious weeds. Cooperative weed management arrangements utilize local, state and Federal resources to inventory and treat weed infestations on both public and private lands. Populations are recorded, treated, monitored, and retreated as their presence is known. No identified locations of weeds within the Moore FFR allotment are currently recorded on public land. Undiscovered noxious weeds may exist. Noxious weed control is ongoing.

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

Livestock may spread weeds and invasive species through transport on fur and on hoofs, as well as through ingestion and later defecation of viable seeds. Soil disturbance resulting from livestock concentration adjacent to water sources, salting areas, and routes of travel provides sites for establishment of weeds and invasive species. The level of risk associated with implementation of each of the alternatives considered in the EA is proportional to the number of livestock authorized to graze within the allotment and the

¹⁸ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.2.4 and Section 3.3.12.2.3.2

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

concentration of soil disturbance. Risks of weed and invasive species introduction and spread would be greater, with significantly higher cattle numbers as vectors of seed movement and as soil disturbance is increased, while those risks associated with authorized livestock grazing would be eliminated in the no-grazing alternative. Alternative 3 will retain the permittee's discretion regarding the number of cattle that graze on all land ownerships in the allotment, while not exceeding authorized active AUMs used on public land. As a result, livestock as a vector of seed dissemination and soils disturbance would be unchanged from the current situation and alternatives other than under Alternatives 4 and 5.

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

Under Alternative 3, 0.2 miles of perennial stream, and 1.8 miles of intermittent/ephemeral stream on public land within the allotment would be affected by the impacts associated with summer grazing 2 of each 3 years and fall grazing the third of each 3 years. Although the cattle number would be at the discretion of the permittee, other mandatory terms and conditions of the permit under Alternative 3 include limits to the intensity of grazing use within riparian areas that would reduce impacts (stubble height, woody browse, and bank alteration). Monitoring would be required during the years when use would occur during the riparian constraint period (July 1 through September 30) and would add assurances that progress would be made toward meeting Standards 2 and 3. Therefore, the allotment would make progress toward meeting the riparian-wetland Standards under Alternative 3; this progress would not be made under Alternatives 1 or 2 because they do not include limits to intensity of use in riparian areas.²⁰

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

No special status plant species are known to be present on public land within the Moore FFR allotment. Therefore, no new impacts to special status plants would occur under Alternative 3.²¹

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

Because perennial grasses and forbs would receive less grazing pressure during the growing season (no more than 2 of every 3 years and no more than 20 percent utilization at the end of the critical growth period) as compared to the current grazing practices, grasses and perennial forbs would increase in abundance and vigor. This would improve the quality of upland habitats for dependent species by increasing nesting and hiding cover and forage amounts. Under Alternative 3, grazing practices would not impede juniper encroachment and increased juniper cover would continue to reduce the amount and quality of shrub steppe habitat in this allotment. Although progress toward meeting Standard 8 under Alternative 3 in shrub steppe habitats within the Moore FFR allotment would not be made, the causal factors would not include grazing management practices.

Vegetation communities that provide riparian habitats would also receive less grazing pressure during the mid-summer growing season, as compared to the current grazing practices. This would allow woody and herbaceous species to increase in vigor and abundance. Increased vigor and abundance would result in more extensive and complex riparian habitats and provide improved shading and stability for redband trout, spotted frog, and other riparian-dependent species. Under Alternative 3, riparian habitats within the Moore

²⁰ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.3 and Section 3.3.12.2.3.3

²¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.4 and Section 3.3.12.2.3.4

FFR allotment would make progress toward meeting Standard 8, whereas that progress would not be realized under Alternatives 1 or 2.²²

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

During the NEPA process, some asked the BLM to consider using grazing to limit wildfire. The BLM has considered the issue and determined that it would be theoretically possible to graze livestock at the landscape scale to reduce fire behavior or use targeted grazing to create fuel breaks on the Toy Mountain Group allotments with the intention that livestock grazing would help control the spread of large wildfires in the area. However, the resource costs associated with this strategy are such that I have decided against it. Ultimately, implementation of Alternative 3 for the Moore FFR allotment will not significantly alter fire behavior during extreme conditions or the BLM's ability to fight wildfire in the area.

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

While targeted grazing may have potential application to develop and maintain strategic fire breaks, its application needs to be considered in combination with other fuels management tools. In addition, targeted grazing to create fire breaks would alter the role of permit renewal. Grazing authorized by permit renewal would provide authorization to use public land resources, while fuels management changes the objective to manipulate vegetation attributes. Targeted grazing to establish fuel breaks, as well as landscape-scale grazing to reduce fuels, are outside the purpose and need of the EA that analyzed the consequences of implementing livestock management practices identified in the application received and alternatives for grazing permit renewal authorizing cattle grazing to meet rangeland health standards and resource management objectives.²³

Issue 9: Consider the two-fold issue of climate change and its relationship to the proposed federal action of renewing grazing permits. Livestock grazing in Owyhee County contributes CO2 and methane emissions to the earth's atmosphere. In addition, climate change, itself a stressor on the sagebrush-steppe semi-arid ecosystem found in the Owyhee Uplands can, when found in conjunction with cattle grazing, further stress the ecosystem's vegetation.

Climate change is another factor I considered in building my decision around Alternative 3 for the Moore FFR allotment. Climate change does not have a clear cause-and-effect relationship with the applicant's proposed action or alternatives. It is currently beyond the scope of existing science to identify a specific source of greenhouse gas emissions or sequestration and designate it as the cause of specific climate or

²² For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0021-EA Section 3.2.5 and Section 3.3.12.2.3.5

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

resource impacts at a specific location. Additionally, the proposed action and alternatives, when implemented, would not have a clear, measurable cause-and-effect relationship to climate change because the available science cannot identify a specific source of greenhouse gas emissions such as those from livestock grazing and tie it to a specific amount or type of changes in climate.

Climate change is a stressor that can reduce the long-term competitive advantage of native perennial plant species. Since livestock management practices can also stress sensitive perennial species in arid sagebrush steppe environments, I considered the issues together, albeit based on the limited information available on how they relate in actual range conditions. It is clear that the Moore FFR allotment is impaired from historic use, and while repair and restoration will only occur in the long term, some change can be anticipated from the proposed limitations to seasons of use. The opportunity to provide resistance and resilience within native perennial vegetation communities is within the scope of this decision. The livestock management actions under Alternative 3 combine seasons, intensities, and durations of livestock use to promote long-term plant health and vigor. Assuming that climate change affects the arid landscapes in the long term, the native plant communities on this allotment will be better armed to survive such changes.

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

During the scoping process, concerns were raised about the impacts of modifications or reductions in grazing to regional socio-economic activity. I share this concern, and have taken these concerns into consideration in making my decision; however, my primary obligation is to ensure that the new grazing permit protects resources in a manner consistent with the BLM's obligations under the Idaho S&Gs and the ORMP. As noted above, I have selected Alternative 3 for the Moore FFR allotment in large part because this selection accomplishes those latter goals.

Over the long term, your grazing operation relies upon maintenance of the natural resources, including productive and healthy rangelands capable of supplying a reliable forage base. Selection of an alternative based in unsustainable grazing practices that do not meet rangeland health standards would result in less-reliable amounts of forage over the long term, in addition to reducing economic opportunities from ecosystem services and alternate socio-economic resources, such as recreation, that rely on healthy, functional and aesthetically pleasing open spaces and wildlife habitats.

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

Additional Rationale

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

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

I did consider selecting Alternative 5 - No Grazing for this allotment; however, based on all the information used in developing my decision, I believe that the BLM can meet resource objectives and still allow grazing on the allotment. In selecting Alternative 3 for the Moore FFR allotment, rather than Alternative 5, I especially considered (1) BLM's ability to meet resource objectives using the selected Alternative 3, (2) the impact of implementation of Alternative 5 on your operations and on regional economic activity, (3) the Moore FFR allotment's susceptibility to significant improvement under Alternative 5, and (4) your past performance under previous permits. By implementing Alternative 3, the resource issues identified will be addressed. Declining to authorize grazing for a 10-year period, as would occur under Alternative 5, is not the management decision most appropriate at this time in light of these factors.

During the public comment period for the Preliminary EA, we received comments from members of the interested public stating that the BLM should analyze the effects of livestock grazing in an Environmental Impact Statement (EIS) rather than an EA. The BLM completed EIS # DOI-BLM-ID-B030-2012-0014-EIS that analyzes the effects of livestock grazing in the Chipmunk Group 2 allotments which are associated with the Owyhee 68 permit renewal process. The scope of analysis in this EIS is relevant to all the allotments within the Owyhee Field Office and supports the analysis in the Groups 3, 4, 5, and 6. As stated earlier in this Proposed Decision, I am incorporating by reference the analysis in the Chipmunk Group 2 EIS.

Finding of No Significant Impact

A FONSI was signed on November 20, 2013 and concluded that the proposed decision to implement Alternative 3 is not a major federal action that will have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. That finding was based on the context and intensity of impacts organized around the 10 significance criteria described at 40 CFR § 1508.27. Therefore, an environmental impact statement is not required. A copy of the FONSI for EA number DOI-BLM-ID-B030-2013-0021-EA is available on the web at:

http://www.blm.gov/id/st/en/prog/grazing/owyhee_grazing_group.html

Conclusion

In conclusion, it is my decision to select Alternative 3 over other alternatives, because livestock management practices under this selection best meet the ORMP objectives allotment-wide and the Idaho S&Gs, consistent with the projected ability of BLM to oversee grazing on the Moore FFR allotment over the next 10 years. Although Alternatives 1 and 2 would implement livestock management practices on the Moore FFR allotment that would continue to allow some standards to be met or significant progress to be made, Alternative 3 would allow progress to be made toward meeting Standard 2 and 3 for riparian related resources, Standard 8 for wildlife habitats, and ORMP management objectives. Although Alternative 4 would provide a limited additional assurance that these standards would be met and resource values would be additionally protected as compared to Alternative 3, Alternative 4 would unnecessarily limit your livestock management options and also unnecessarily add to the livestock grazing administrative workload for BLM for this allotment with limited public land.

Alternative 5 would limit the economic activity of your livestock operation in Owyhee County and southwest Idaho, a region where livestock production and agriculture is a large portion of the economy. That, in conjunction with current resource conditions and the improvement anticipated by implementation of the decision, lead me to believe further reduction or the elimination of livestock grazing from the Moore FFR allotment is unnecessary at this point.

This grazing decision and subsequent permits are being issued under the authority of 43 CFR 4100 and in accordance with the Owyhee Resource Management Plan (43 CFR 4100.0-8), thus all activity thereunder must comply with the objectives and management actions of the Plan.

Authority

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

- 4100.0-8 Land use plans: The ORMP designates the Moore FFR allotment as available for livestock grazing;
- 4130.2 Grazing permits or leases: Grazing permits may be issued to qualified applicants on lands designated as available for livestock grazing. Grazing permits shall be issued for a term of 10 years unless the authorized officer determines that a lesser term is in the best interest of sound management;
- 4130.3 Terms and conditions: Grazing permits must specify the terms and conditions that are needed to achieve desired resource conditions, including both mandatory and other terms and conditions; and
- 4180 Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration: This proposed decision will result in taking appropriate action to modifying existing grazing management in order to meet or make significant progress toward achieving rangeland health.

Right of Protest and/or Appeal

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

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

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

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

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

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

email filing of a notice of appeal and petition for stay. Any notice of appeal and/or petition for stay must be sent or delivered to the office of the authorized officer by mail or personal delivery.

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

Boise Field Solicitors Office
University Plaza
960 Broadway Ave., Suite 400
Boise Idaho, 83706

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

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

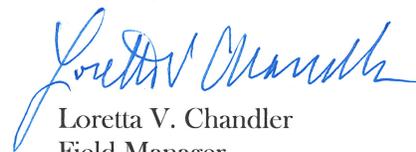
- (1) The relative harm to the parties if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

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

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

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

Sincerely,



Loretta V. Chandler
Field Manager
Owyhee Field Office

Works Cited

- USDA FSA. (2011, Last modified: August 18). *National Agriculture Imagery Program (NAIP)*. Retrieved from <http://www.fsa.usda.gov/FSA/apfoapp?area=home&subject=prog&topic=nai>
- USDI BLM. (1999). *Owyhee Resource Management Plan*. Marsing, ID.
- USDI BLM. (2013). *Moore FFR (0606) Initial Allotment and Permit/Lease Review and Rangeland Health Assessment, 2013 Supplement*. Marsing, ID.

Copies sent to:

Company Name	First Name	Last Name	Address	City	State	Zip
Boise District Grazing Board	Stan	Boyd	PO Box 2596	Boise	ID	83701
Colyer Cattle Co.	Ray & Bonnie	Colyer	31001 Colyer Rd.	Bruneau	ID	83604
Estate of Charles Steiner	John	Steiner	24597 Collett Rd.	Oreana	ID	83650
Friends of Mustangs	Robert	Amidon	8699 Gantz Ave.	Boise	ID	83709
Gusman Ranch Grazing Association LLC	Forest	Fretwell	27058 Pleasant Valley Rd.	Jordan Valley	OR	97910
ID Cattle Association			PO Box 15397	Boise	ID	83715
ID Conservation League	John	Robison	PO Box 844	Boise	ID	83701
ID Dept. of Agriculture	John	Biar	2270 Old Penitentiary Rd., PO Box 7249	Boise	ID	83707
ID Fish & Game	Rick	Ward	3101 S. Powerline Rd.	Nampa	ID	83686
ID Wild Sheep Foundation	Director Jim	Jeffress	PO Box 8224	Boise	ID	83707
ID Wild Sheep Foundation	Herb	Meyr	570 E. 16 th N.	Mountain Home	ID	83647
Idaho Dept. of Lands			PO Box 83720	Boise	ID	83720-0050
Idaho Farm Bureau Fed			PO Box 167	Boise	ID	83701
IDEQ			1445 N. Orchard	Boise	ID	83706
Hardee & Davies LLP	Michael & Marcus	Christian	737 N. 7 th St.	Boise	ID	83702
Intermountain Range Consultants	Bob	Schweigert	5700 Dimick Ln.	Winnemucca	NV	89445
International Society for the Protection of Horses & Burros	Karen	Sussman	PO Box 55	Lantry	SD	57636
Jaca Livestock	Elias	Jaca	817 Blaine Ave.	Nampa	ID	83651
Josephine Ranch	Steve	Boren	1050 N. Briar Lane	Boise	ID	83712
Juniper Mtn. Grazing Assn.	Michael	Stanford	3581 Cliffs Rd.	Jordan Valley	OR	97910
Land & Water Fund	William	Eddie	PO Box 1612	Boise	ID	83701
LU Ranching	Tim	Lowry	PO Box 132	Jordan Valley	OR	97910
LU Ranching	Bill	Lowry	PO Box 415	Jordan Valley	OR	97910
Moore Smith Buxton & Turcke	Paul	Turcke	950 W Bannock, Ste. 520	Boise	ID	83702
Natural Resources Defense Council	Johanna	Wald	111 Sutter St, 20 th Floor	San Francisco	CA	94104
Northwest Farm Credit Services			815 N. College Rd.	Twin Falls	ID	83303
Northwest Farm Credit Services, FLCA	Maudi	Hernandez	16034 Equine Drive	Nampa	ID	83687
Oregon Division State Lands			1645 NE Forbes RD., Ste. 112	Bend	OR	97701
Owyhee Cattlemen's Assn.			PO Box 400	Marsing	ID	83639
Owyhee County Commissioners			PO Box 128	Murphy	ID	83650
Owyhee County Natural Resources Committee	Jim	Desmond	PO Box 128	Murphy	ID	83650
Ranges West			2410 Little Weiser Rd.	Indian Valley	ID	83632
Resource Advisory Council	Chair Gene	Gray	2393 Watts Lane	Payette	ID	83661
Schroeder & Lezamiz Law Offices			PO Box 267	Boise	ID	83701
Shoshone-Bannock Tribes	Tribal Chair Nathan	Small	PO Box 306	Ft. Hall	ID	83203
Sierra Club			PO Box 552	Boise	ID	83701
Soil Conservation District	Cindy	Bachman	PO Box 186	Bruneau	ID	83604
State Historic Preservation Office			210 Main St.	Boise	ID	83702
State of NV Div. of Wildlife			60 Youth Center Rd.	Elko	NV	89801
The Fund for the Animals, Inc.	Andrea	Lococo	1363 Overbacker	Louisville	KY	40208

Company Name	First Name	Last Name	Address	City	State	Zip
The Nature Conservancy			950 W Bannock St., Ste. 210	Boise	ID	83702
US Fish & Wildlife Service			1387 S Vinnell Way, Rm. 368	Boise	ID	83709
USDA Farm Services			9173 W. Barnes	Boise	ID	83704
Western Watershed Projects			PO Box 1770	Hailey	ID	83333
Western Watershed Projects	Katie	Fite	PO Box 2863	Boise	ID	83701
Zions First National Bank	Bertha	Scallon	500 5 th St.	Ames	IA	50010
	Russ	Heughins	10370 W. Landmark Ct.	Boise	ID	83704
	Brett	Nelson	9127 W. Preece St.	Boise	ID	83704
	Charles	Lyons	11408 Hwy. 20	Mountain Home	ID	83647
	Ed	Moser	22901 N. Lansing Ln.	Middleton	ID	83644
	Bill	Baker	2432 N. Washington	Emmett	ID	83617-9126
	Anthony & Brenda	Richards	8935 Whiskey Mtn. Rd.	Murphy	ID	83650
	Martin & Susan	Jaca	21127 Upper Reynolds Creek Rd.	Murphy	ID	83650
	Vernon	Kershner	PO Box 38	Jordan Valley	OR	97910
	Ramona	Pascoe	PO Box 126	Jordan Valley	OR	97910
	Chad	Gibson	16770 Agate Ln.	Wilder	ID	83676
	Kenny	Kershner	PO Box 300	Jordan Valley	OR	97910
	John	Edwards	15804 Tyson Rd.	Murphy	ID	83650
	Rohl	Hipwell	18125 Oreana Loop Rd.	Oreana	ID	83650
	Robert	Thomas	17947 Shortcut Rd.	Oreana	ID	83650
	Craig & Georgene	Moore	PO Box 14	Melba	ID	83641
	Scott & Sherri	Nicholson	PO Box 690	Meridian	ID	83680
	Joseph	Parkinson	123 W. Highland View Dr.	Boise	ID	83702
	Senator James E.	Risch	350 N. 9th St., Ste. 302	Boise	ID	83702
	Senator Mike	Crapo	251 E. Front St., Ste. 205	Boise	ID	83702
	Congressman Raul	Labrador	33 E. Broadway Ave., Ste. 251	Meridian	ID	83642
	Congressman Mike	Simpson	802 W. Bannock, Ste. 600	Boise	ID	83702
	Conrad	Bateman	740 Yakima St.	Vale	OR	97918
	Gene	Bray	5654 W. El Gato Ln.	Meridian	ID	83642
	Dan	Jordan	30911 Hwy. 78	Oreana	ID	83650
	Floyd	Kelly Breach	9674 Hardtrigger Rd.	Given Springs	ID	83641
	Lloyd	Knight	PO Box 47	Hammett	ID	83627
	John	Romero	17000 2X Ranch Rd.	Murphy	ID	83650
	John	Townsend	8306 Road 3.2 NE	Moses Lake	WA	98837
	Elmer	Stahle	17965 Oreana Loop Rd.	Murphy	ID	83650
	John	Richards	8933 State Hwy. 78	Marsing	ID	83639
Office of Species Conservation	Cally	Younger	304 N. 8 th St., Ste. 149	Boise	ID	83702

Appendix K

This appendix hereby incorporates by reference the below language in its entirety into the DOI-BLM-ID-B030-2013-0021-EA Final Environmental Assessment (EA).

During public scoping and comment periods for the Toy Mountain Group permit renewal process, suggestions were received from interested publics that the BLM's NEPA process would be better served if the agency would prepare an Environmental Impact Statement (EIS) rather than an EA and Finding of no Significant Impacts (FONSI) to identify and analyze the geographic extent of the environmental impacts of livestock grazing activities in these allotments.

The BLM published a Final EIS (DOI-BLM-ID-B030-2012-0014-EIS) on October 4, 2013, that analyzed the renewal of grazing permits on twenty-five allotments (known as Group 2) in the Jump Creek, Succor Creek, and Cow Creek watershed areas in the northern part of the Owyhee Field Office. This EIS defined Cumulative Impacts Analysis Areas (CIAAs) for social and economic effects and for the Owyhee subpopulation area, including, but not limited to (Connelly, Knick, Schroeder, & Stiver, 2004) sage-grouse habitat.

The BLM subsequently prepared three EAs (for the Toy Mountain Group, South Mountain Group, and the Morgan Group of allotments). When the CIAAs were defined, the boundaries were the same as the Group 2 EIS CAAA boundaries. The BLM found that the geographic boundary beyond which impacts to resources and habitat would no longer be measurable is the same for all groups. The rationale for establishing these boundaries is found in Section 3.4 of the Toy Mountain, South Mountain, and Morgan EAs where cumulative effects analysis begins; the cumulative effects analysis that resulted from the EIS did not unveil any effects not also recognized in the cumulative effects analyses in the EAs.