



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

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In Reply Refer To:
4160 ID130

November 21, 2013

REGISTERED MAIL

Lequerica and Sons, Inc.
C/O Tim Lequerica
PO Box 135
Arock, OR 97902

LU Ranch
C/O Tim Lowry
Box 415
Jordan Valley, OR 97910

Notice of Field Manager's Proposed Decision

Dear Mr. Lequerica and Mr. Lowry:

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

The BLM recently evaluated current grazing practices and conditions in the Lequerica FFR allotment. We undertook this effort to ensure that any renewed grazing permit is consistent with the BLM's legal and land management obligations. As part of the BLM's evaluation process, Rangeland Health Assessments, Evaluations, and Determinations were completed; the initial allotment review and the Rangeland Health Assessments and Evaluations were developed in 2006 and updated in 2013, and the Determination was signed in 2013. 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 the Group 4, or South Mountain Group, allotments, which includes the Lequerica FFR allotment. The letter solicited comments and information to identify resource and management issues associated with the Idaho Rangeland Health Standards and Guidelines (Idaho S&Gs) and the Owyhee Resource Management Plan (ORMP) for the purpose of developing grazing management alternatives for allotments in the South Mountain Group. The letter also served to request additional resources and monitoring information that could help the BLM to complete the permit renewal process.

In addition to the scoping period identified above, members from the National Environmental Policy Act (NEPA) Permit Renewal Team met with you on February 27, July 15, and August 27, 2013, to discuss your grazing permit renewal application, current allotment conditions, and your livestock operations within this allotment. During this meeting, the BLM discussed with you our preliminary conclusions regarding rangeland health and Idaho S&Gs and made grazing management recommendations associated with your grazing permit renewal application.

On August 30, 2013, BLM issued the completed 2013 RHAs, Evaluations, and Determinations for the South Mountain Group allotments to you and all interested publics of record. Issuance of the RHAs and Determinations afforded you an opportunity to meet with my staff to discuss any additional grazing management changes, your application, and any input regarding completion of the Group 4 (South Mountain Group) Environmental Assessment (EA). Additionally, a preliminary EA was issued to the public on October 18, 2013, for 15-day review and comment. Issuance of the preliminary EA afforded another opportunity for grazing permittees and interested publics to provide additional input on the EA proposed grazing decision. 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 Lequerica FFR allotment; however, these resource condition concerns are not related to current livestock management practices.

With the focus of addressing livestock grazing's impacts to public land resources, my office prepared and issued the South Mountain Group Environmental Assessment¹ (EA) in which we considered a number of options and approaches to maintain and improve resource conditions within the seven allotments of the South 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 Lequerica FFR

¹ EA number DOI-BLM-ID-B030-2013-0022-EA analyzed five alternatives for livestock grazing management practices to fully process permits within the South Mountain Group of allotments.

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.

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

This proposed decision will:

- Describe current conditions and issues on the allotments;
- Briefly discuss the alternative grazing management schemes that the BLM considered in the EA;
- Respond to the applications for grazing permit renewal for use in the Lequerica FFR allotment;
- Outline my proposed decision to select Alternative 3 in the Lequerica FFR allotment; and
- State the reasons why I made that selection.

Background

Allotment Setting

The Lequerica FFR allotment is located in Owyhee County, Idaho, approximately 14 miles southeast of Jordan Valley, Oregon (see Map 1). In the ORMP, the Lequerica FFR allotment is listed as a Custodial (C) category allotment. The allotment is subdivided into two pastures with 11 AUMs of permitted grazing. Although the existing permit identifies a season of use from December 1 to December 31, it also includes a term and condition that the number of livestock and season of use within the allotment is at the permittee’s discretion. A summary of the acres of land in the allotment are provided in Table 1.

Table 1: Acres for the Lequerica FFR Allotment (0457)

Pastures	Public	State	Private	Total
1	47	0	668	
2	23	0	224	
Total	70 (13%)	0	892 (87%)	962 (100%)

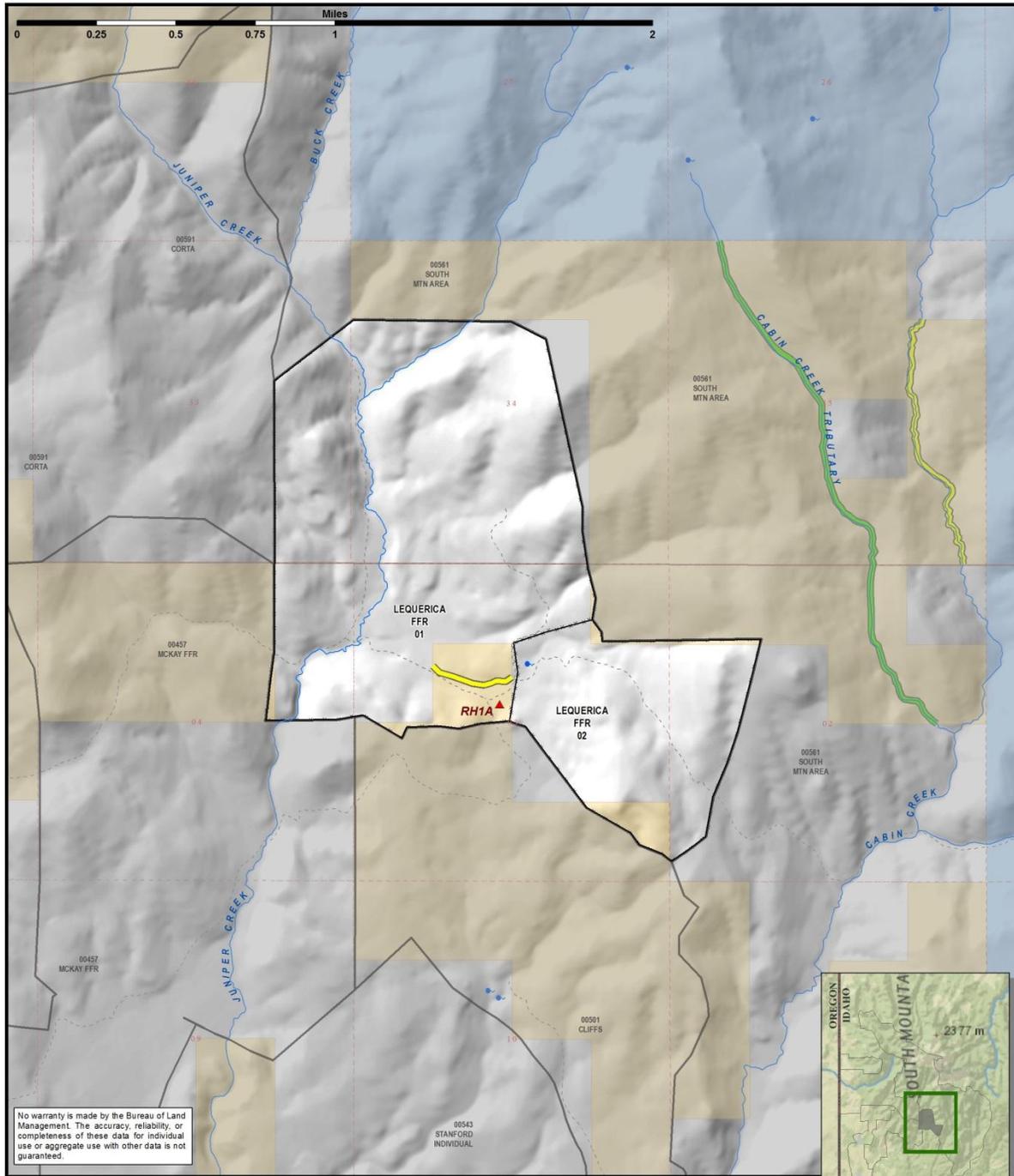
The Lequerica FFR allotment is situated within the Owyhee Uplands and Canyons Ecoregion and is characterized by rolling shrub steppe uplands interrupted by juniper woodlands, low hills, and rocky outcrops, and flat tablelands. The Lequerica FFR allotment is composed of two major ecological sites, loamy 13-16” mountain big sagebrush/bluebunch wheatgrass-Idaho fescue (54 acres, or 78 percent), with very shallow stony loam 10-14” low sage/Sandberg bluegrass-bluebunch wheatgrass site making up the remainder (14 acres, or 20 percent).

The ecological sites show that under natural disturbance regime, the Lequerica FFR allotment should be dominated by sagebrush/bunchgrass communities. Other vegetation types such as western juniper, basin big sagebrush, and riparian areas are expected to occur as unmapped inclusions within the larger ecological sites, and each should make up only a small percentage of the area. Currently, the expansion of juniper into former shrub communities has transformed much of the area into woodlands ranging from open, savanna-like conditions to denser canopy forest. Juniper trees are common to dominant members of the plant community, and invasive grasses are a concern, compromising biological integrity.

Across ecological sites within the allotment, effective average annual precipitation ranges from 10-16 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 Lequerica FFR allotment is dominated by juniper (38 percent), mountain shrub (36 percent), mountain big sage (23 percent), low sagebrush (4 percent), and wet meadow (2 percent). No noxious weeds have been mapped in the Lequerica FFR allotment. However, other invasive (but not noxious) non-native plants present include bulbous bluegrass and cheatgrass. These species are generally in localized disturbed areas and are not dominant.



Map 1: Lequerica FFR (00473) 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 | PFC Assessment Rating | Perennial Stream | Management |
| Pasture Boundary | Spring | PFC | Improved Road | BLM |
| Monitoring | Trough | FAR | 4WD Road | State |
| Nested Plot Frequency Trend | Exclosure | NF | Water Body | Private |
| RHA Point | | | | |



1:25,000

Approximately 0.3 mile of an intermittent tributary of Juniper Creek runs through public lands on pasture 1. Historically, a majority of the allotment provided suitable habitat for Greater sage-grouse (*Centrocercus urophasianus*; from this point on referred to as sage-grouse) and supported significant populations. Currently, only sage-grouse Preliminary General Habitat (PGH) occurs in portions of the Lequerica FFR allotment, and of that, only 1 percent exists on public lands. Fire has not been reported in the allotment since the 1960's. No federally listed threatened or endangered species are known to occur in Lequerica FFR allotment.

The Lequerica FFR allotment is currently only authorized to Lequerica and Sons for 11 AUMs. However during this permit renewal process it was determined that the BLM had made a mistake in identifying private land ownership within the allotment. Our past records had only Lequerica and Sons grazing the allotment however since approximately 1976 LU ranches has owned private property and grazed within the allotment. Therefore, a transfer has occurred which resulted in preference for LU Ranch and authorization for 3 AUMs from Lequerica and Sons. This transfer of partial preference has resulted in 8 AUMs for Lequerica and Sons and 3 AUMs for LU Ranch.

Current Grazing Authorization

Currently, only Tim Lequerica is authorized to graze livestock within the Lequerica FFR allotment pursuant to a grazing permit issued by the BLM. The terms and conditions of that grazing permit are as follows in Table 2:

Table 2: Mandatory and Other Terms and Conditions for the Lequerica FFR Allotment

Livestock		Grazing Period		% PL	Type Use	AUMs
Number	Kind	Begin	End			
11	Cattle	12/1	12/31	100	Active	11

Terms and conditions:

1. The number of livestock and season of use on the Fenced in Federal Range (FFR) allotment 0456 is at your discretion.
2. Grazing use will be in accordance with the grazing schedule identified in the final decision of the Owyhee Field Office Manager dated _____. Livestock grazing will be in accordance with your allotment grazing schedule(s). Changes to the scheduled use require approval.
3. Turn-out is subject to the Boise District range readiness criteria (Appendix I).
4. The permittee's certified actual use report is due within 15 days of completing the authorized annual grazing use.
5. Salt and/or supplements shall not be placed within one-quarter (1/4)-mile of springs, streams, meadows, aspen (*Populus tremuloides*) stands, playas, special status plant populations, or water developments.
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. Pursuant to 43 CFR 10.4(B), the permittee must notify the BLM field manager, by telephone with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony (as defined in 43 CFR 10.2) on federal lands. Pursuant to

- 43 CFR 10.4 (C), the permittee must immediately stop any ongoing activities connected with such discovery and make a reasonable effort to protect the discovered remains or objects.
8. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use.
 9. 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.
 10. 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.
 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, 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 schedule(s). Changes in scheduled pasture use dates will require prior authorization.
 13. Utilization may not exceed 50 percent of the current year's growth.

Terms and conditions imposed by the U.S. District Court in February 29, 2000:

- Key herbaceous riparian vegetation, where streambank stability is dependent upon it, will have a minimum stubble height of 4 inches on the streambank, along the greenline, after the growing season.
- Key riparian browse vegetation will not be used more than 50 percent of the current annual twig growth that is within reach of the animals.
- Key herbaceous riparian vegetation on riparian areas, other than the streambanks, will not be grazed more than 50 percent during the growing season, or 60 percent during the dormant season.
- Streambank damage attributable to grazing livestock will be less than 10 percent on a stream segment.

Livestock Management

Under this permit, Lequerica and Sons, Inc is authorized 11 AUMs of permitted grazing between December 1 and December 31. Your permit includes a term and condition that the number of livestock and season of use within the allotment is at your discretion; thus, the season of use is for 365 days of potential use. Actual use data indicate a maximum of 350 cattle grazed within the allotment, with most of the use occurring from September 1 to October 12. 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 allotments.

Resource Conditions

The BLM completed a rangeland health assessment, evaluation, and a determination for the Lequerica FFR allotment in 2013. Those documents concluded that some of the resources on the Lequerica FFR allotment were not meeting the Idaho S&Gs. Specifically, the BLM determined the allotment did not meet Standards 1 (Watersheds), 2 (Riparian Areas and Wetlands), 3 (Stream

Channel/Floodplain), 4 (Native Plant Communities), and 8 (Threatened and Endangered Plants and Animals); Standard 7 is met; and Standards 5 (Seedings) and 6 (Exotic Plant Communities, Other Than Seedings) are not applicable to this allotment. Current livestock grazing management practices are not significant factors in the allotment not meeting Standards 1, 2, 3, 4, and 8. Juniper encroachment and historic grazing management are the causal factors. Livestock management practices on the allotment conform to the Idaho S&Gs.

Vegetation - Uplands²

The Lequerica FFR allotment does not meet Standard 4 (Native Plant Communities) due to juniper invasion as a result of an altered fire regime; the determination did not identify current livestock management practices as a contributing factor. Historic grazing practices and an extended fire frequency from natural disturbance regimes contribute to juniper invasion. In addition, the determination noted the shift from deep-rooted perennial grasses to shallow-rooted perennial grasses and invasive grasses (bulbous bluegrass and cheatgrass). Crown die-off is occurring in bluebunch wheatgrass and Idaho fescue, although adequate seedstalks were noted to be on plants in protected areas with concern for over use affecting reproduction.

Watersheds/Soils³

Current livestock grazing management practices are not significant factors for this allotment's failure to meet the land health standard for Standard 1 (Watersheds). Juniper encroachment is reducing effective precipitation in the watershed directly by intercepting precipitation and indirectly by shading out those plant assemblages that would otherwise provide for water entry pathways. As a result, less water is available for photosynthesis, and the potential for energy flow is reduced. Although evidence of accelerated erosion is not apparent, juniper age class distribution, invasive plants, and decadent native bunchgrasses indicate high potential for downward trend for hydrologic function in the future.

Recent use has been limited to autumn, well after the period when understory herbaceous species are most vulnerable to adverse grazing effects. Historic grazing pressure may have promoted juniper encroachment indirectly if season-long grazing removed enough fine fuel each year to alter the fire regime. None of the soils on BLM-administered public land in the allotment have high erosion hazard.

Water Resources and Riparian/Wetland Areas⁴

The Lequerica FFR allotment is meeting Standard 7 (Water Quality).

Standards 2 (Riparian Areas and Wetlands) and 3 (Stream Channel/Floodplain) are not being met in the Lequerica FFR allotment because approximately 0.3 mile of a tributary of Juniper Creek was assessed functioning-at-risk (FAR) in 2013. The tributary is an intermittent reach; the floodplain has been compacted; and the run-off occurs quickly, adding to erosion. Spring flows have created

² For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0022-EA, Section 3.3.2.1.1 and Appendix E and F.

³ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0022, Section 3.3.2.1.2 and Appendix E.

⁴ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0022, Section 3.3.2.1.3 and Appendix E.

unnatural meander bends where erosion is occurring and the sinuosity has been altered. Riparian-wetland species are sparse within the riparian area and upland species are more dominant.

Current livestock grazing management practices were not identified as the significant causal factors for not meeting standards because, in recent years, the allotment has been used for short durations during the fall months and not in the hot summer months, when lasting negative impacts to riparian areas are most likely to occur. In the fall, as temperatures decrease, cattle are more likely to travel further from water, taking grazing impacts to the uplands, where fall grazing causes few impacts to plants entering dormancy. Issues identified through the assessment were likely caused by historic grazing that occurred during the summer months and/or year-round, which would have resulted in repeated critical growth period grazing in riparian areas, giving riparian little to no opportunity for recovery.

Special Status Plants

No federally listed threatened or endangered plants or BLM special status plants are known to occur in the Lequerica FFR allotment.

Wildlife/Wildlife Habitats and Special Status Animals⁵

The Lequerica FFR allotment is not meeting Standard 8 (Threatened and Endangered Plants and Animals), although current livestock grazing management practices are not significant factors for this allotment's failure to meet the standard. Although no threatened or endangered plants or animals are located on the allotment, the evaluation and determination for Standard 8 was based on evaluations for Standards 1, 2, 3 and 4, as their analyses directly reflect conditions of wildlife habitat on uplands in the allotment.

Conversion of sagebrush habitats to juniper woodlands is the primary limiting factor on public lands in the Lequerica FFR allotment. Although the increase in juniper cover may have benefited some woodland-associated special status wildlife species such as northern goshawks and Lewis' woodpeckers, these woodland habitats are unsuitable for and have come at the expense of sagebrush-obligate and shrub-dependent special status species such as sage-grouse, pygmy rabbits, Brewer's sparrows, loggerhead shrikes, and sage sparrows. Although juniper woodlands currently make up 38 percent of the allotment (all ownerships), if their densities continue to increase, sagebrush-obligate species will be further impacted.

No federally listed threatened or endangered animals are known to occur in the Lequerica FFR allotment. One candidate species, the Columbia spotted frog, could potentially occur in the allotment, as surveys have never been conducted in the allotment and potential habitat does exist on BLM and private lands. A second candidate species, the sage-grouse, has no designated Preliminary Priority Habitat (PPH) in the allotment, and Preliminary General Habitat (PGH) is limited to private lands only in the very northern portion of the allotment and the area west of Juniper Creek. Very few acres in the allotment serve as potential sage-grouse habitat. As many as 11 mammal, 20 bird, 2 amphibian, 3 fish, and 3 reptile species with BLM special status (including Watch List Species) potentially occur within the allotment. No special status species that have been

⁵ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0022-EA, Section 3.3.2.1.5 and Appendix E.

documented in the Idaho Fish and Wildlife Information System are found within the allotment; however, redband trout are known to occur in Juniper Creek on private land. In fact, western toads and Columbia spotted frogs are the only other special status species that have been documented within 3 miles of the Lequerica FFR allotment.

Standard 8 for botany is met in the Lequerica FFR allotment. There are no federally listed plant species, and there is insufficient information to determine site-specific impacts of livestock grazing on any special status plants that occur in this allotment.

Guidelines for Livestock Grazing Management

The Lequerica FFR allotment is conforming to all Guidelines for Livestock Grazing Management.

Issues⁶

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 South Mountain Group allotments:

1. *Habitat conditions for sage-grouse:* Sage-grouse habitat health is directly related to upland vegetation and watershed conditions. Specific areas of the South Mountain Group allotments contain altered sagebrush, community composition, structure, and function that are affecting sage-grouse and other sagebrush habitat-dependent species. Other areas in the group are outside of defined sage-grouse habitat.
2. *Fish and amphibian habitat conditions:* Stream, floodplain, wetland, and mesic (moderately moist) habitat conditions are directly related to conditions within the riparian vegetation community. Altering of the riparian community may affect the health and sustainability of fish and amphibian populations.
3. *Soil compaction:* Soil compaction from the physical presence of livestock remains a concern with moist soils, especially in areas with shallow and fine-textured soils. The hazard of compaction of wet soils with hoof action of livestock may be present, resulting in a reduction of infiltration and soil moisture holding capacity in fine-textured soils.
4. *Riparian vegetation conditions:* Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.
5. *Climate change:* The issue of climate change and its relationship to the proposed federal action of renewing grazing permits is twofold. 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 stresses the

⁶ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0022-EA, Section 1.6.3.

ecosystem's vegetation.

6. *Upland vegetation and watershed conditions:* Livestock grazing is affecting upland vegetation by reducing or removing native vegetation communities that protect watershed soil and hydrologic function.
7. *Special status plant species:* Livestock grazing is adversely affecting special status plants by altering surrounding upland vegetation, habitat, and reproduction of individuals within the allotment.
8. *Noxious and invasive weeds:* Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.
9. *Livestock trailing:* Livestock trailing may adversely affect upland vegetation, soils, weeds, and riparian vegetation.
10. *Cultural resources:* Livestock grazing has the potential to damage or displace artifacts and features of a historic property, which may alter the characteristics that qualify it for listing in the National Register of Historic Places.
11. *Paleontological resources:* Livestock grazing has the potential to cause breakage and displacement of fossils.
12. *Wildfire fuels:* Livestock grazing has the potential to change vegetation that may affect wildfire.
13. *Socioeconomic impacts:* Livestock grazing affects local and regional socioeconomic activities generated by livestock production.

Analysis of Alternative Actions

Based on the current condition of the Lequerica FFR allotment, the BLM considered a number of alternative livestock management schemes in the EA to ensure that any renewed grazing permit would maintain or improve satisfactory conditions (where they exist), and/or allow the allotment to meet or make significant progress toward meeting standards where unsatisfactory conditions exist. Overall, five alternatives were considered and analyzed in the EA. The range of alternatives developed include: Alternative 1 - No Action/Current Condition, Alternative 2 - Applicants' Proposed Action, and Alternative 5 - No Grazing; Alternatives 3 and 4 were developed based on resource constraints.

Proposed Decision

After considering the current grazing practices, the 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 issue a new grazing permit to Lequerica and Sons and LU Ranch, for 10 years consistent with Alternative 3.

Summary of Proposed Decision

The Lequerica FFR allotment is currently only authorized to Lequerica and Sons for 11 AUMs. However, during this permit renewal process it was determined that the BLM had made a mistake in identifying private land ownership within the allotment. Our past records had only Lequerica and Sons grazing the allotment however since approximately 1976 LU ranches has owned private property within the allotment. In order to authorize livestock use to LU Ranch, the BLM would transfer three AUMs from Lequerica and Sons to LU Ranch. This transfer of AUMs would result in the eight AUMs for Lequerica and Sons and three AUMs for LU Ranch. As part of this decision, Lequerica and Sons would graze in pasture 1 only, while LU Ranch would graze in pasture 2 only.

LU ranch applied to graze pasture 2 season long at the permittee discretion and to consider this pasture a new allotment.

Implementation of Alternative 3 over the next 10 years will allow the Lequerica FFR allotment to meet resource objectives outlined in the ORMP. As part of this decision Lequerica and Sons would graze in pasture 1 only while LU ranch would graze in pasture 2 only

The terms and conditions of the renewed grazing permit would be as follows in Table 3:

Table 3: Terms and Conditions

Allotment	Permittee	Livestock		Grazing Period		% PL	Type Use	AUMs
		Number	Kind	Begin	End			
00536 Lequerica FFR	Lequirica and Sons	1	Cattle	3/1	12/1	100	Active	8
00536 Lequerica FFR	LU Ranch	1	Cattle	3/1	12/1	100	Active	3

Terms and conditions:

1. Grazing use will be in accordance with the grazing schedule identified in the final decision of the Owyhee Field Office Manager dated _____. Livestock grazing will be in accordance with your allotment grazing schedule(s). Changes to the scheduled use require approval.
2. Turn-out is subject to the Boise District range readiness criteria.
3. The permittee’s certified actual use report is due within 15 days of completing the authorized annual grazing use.
4. Salt and/or supplements shall not be placed within one-quarter (1/4)-mile of springs, streams, meadows, aspen (*Populus tremuloides*) stands, playas, special status plant populations, or water developments.
5. 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.
6. Pursuant to 43 CFR 10.4(B), the permittee must notify the BLM field manager, by telephone with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred

objects, or objects of cultural patrimony (as defined in 43 CFR 10.2) on federal lands. Pursuant to 43 CFR 10.4 (C), the permittee must immediately stop any ongoing activities connected with such discovery and make a reasonable effort to protect the discovered remains or objects.

7. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use.
8. 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.
9. 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.
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, 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 schedule(s). Changes in scheduled pasture use dates will require prior authorization.
12. Utilization may not exceed 50 percent of the current year's growth.
13. Pasture 1 would be grazed by only Lequerica and Sons, and pasture 2 would be grazed by only LU Ranch.
14. The number of livestock on the Fenced in Federal Range (FFR) allotment 0536 is at your discretion so long as your active AUMs are not exceeded.

Grazing Schedule

The grazing schedule for the Lequerica FFR allotment is not flexible and must follow the schedule outlined in Table 4 below. Pasture 1 may only be used from March 1 to May 31 one of three years.

Table 4: Alternative 3 Lequerica FFR Allotment 3-Year Grazing System

Year	Permittee	Pasture	Date On	Date Off	Days
1	Lequerica and Sons	1	3/1-4/30 Or 10/1-12/1		61 Or 62
	LU Ranch	2	7/16	12/1	139
2	Lequerica and Sons	1	3/1	12/1	276
	LU Ranch	2	3/1	12/1	276
3	Lequerica and Sons	1	10/1	12/1	62
	LU Ranch	2	7/16	12/1	139

Notes on the Terms and Conditions

Lequerica and Sons, you will be offered a grazing permit(s) for a term of 10 years for Lequerica FFR allotment with 8 Active AUMs. LU Ranch, you will be offered a grazing permit(s) for a term of 10 years for Lequerica FFR allotment with 3 Active AUMs. There will be no AUM reduction

on the allotment overall. Permitted use within the Lequerica FFR allotment will be as follows in Table 5 below.

Table 5: Permitted Use

Permittee	Active Use	Suspension	Permitted Use
Lequerica and Sons	8 AUMs	0 AUMs	8 AUMs
LU Ranch	3 AUMs	0 AUMs	3 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 their last grazing permit. Accordingly, I have reviewed your record as a grazing permit holder for the Lequerica 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. I have also found the LU Ranch has a satisfactory record of performance based on past grazing in other allotments and is a qualified applicant.

Justification for the Proposed Decision

Based on my review of EA number DOI-BLM-ID-B030-2013-0022-EA, the rangeland health assessment, evaluation, determination, specialist reports, and other documents in the grazing files, it is my proposed decision to select Alternative 3 for the Lequerica FFR allotment. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will best fulfill the BLM's obligation to manage the public lands under the Federal Land Policy and Management Act's multiple use and sustained yield mandate; it will not cause the Lequerica FFR allotment to not meet Idaho S&Gs because of the proposed livestock management practices; and it will allow the allotment to continue to meet the resource objectives of the ORMP.

Issues Addressed

Earlier in this decision, I outlined the major issues that drove the analysis and decision making process for the Lequerica FFR allotment. I want you to know that I considered the issues specific to this allotment through the lens of each alternative before making my decision. My selection of Alternative 3 for the Lequerica 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.

Habitat conditions for sage-grouse: Extensive areas of juniper encroachment occur in pastures 1 and 2 of the allotment, which reduce the suitability of habitat for the sage-grouse. Historically, the allotment provided suitable habitat for sage-grouse, but currently only PGH is present and is limited to private lands in the very northern portion of the allotment, west of Juniper Creek. The Standard 8 (Threatened and Endangered Plants and Animals) determination is largely driven by

Standards 1 (Watersheds), 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain), and 4 (Native Plant Communities) in this allotment; because of juniper encroachment and historic livestock practices, these four standards are not met. The allotment does not provide suitable habitat conditions for sage-grouse because of juniper encroachment on uplands and historic livestock management practices. Additionally, riparian/wetland late brood-rearing habitat has been impacted by historic livestock practices, as evidenced by the allotment not meeting Standards 2 and 3.

I am convinced that additional, improvement to upland plant communities can be made by instituting changes to grazing management. However, in this case, these changes in grazing management will not result in reduced juniper cover in the Lequerica FFR allotment and will not result in improved habitat conditions for sage-grouse or the attainment of Standard 8 because the primary cause of juniper encroachment is an altered fire regime, not livestock grazing.

Fish and amphibian habitat conditions: Under Alternative 3, the Lequerica FFR allotment would be authorized for livestock grazing during the spring summer and fall over the 3-year rotation. For pasture 1, the 1 year of fall use and 1 year of spring use would allow the 0.8 mile of intermittent streams growing season deferment from the impacts associated with grazing year-round in 2 out of 3 years. The remaining year would continue to be affected by the impacts associated with season-long grazing.

The Lequerica FFR allotment is not meeting Standards 2 (Riparian Areas and Wetlands) and 3 (Steam Channel/Floodplain) in pasture 1, although this is not due to current livestock management practices. Recent actual use for the allotment indicates it has primarily been used during the fall months; the assessment captures issues that were likely caused by season-long (excluding times when there was snow) grazing that occurred historically. Alternative 3 will define the grazing schedule and incorporate 2 years of growing season deferment (in this case, the hot season) as compared to the flexibility that would remain part of the permit under Alternative 1. The elimination of hot season grazing 2 of 3 years will benefit riparian areas by increasing the amount of time riparian vegetation has to recover from the 1 year of hot-season grazing, with the other 2 years of grazing to occur in the spring and late fall when impacts to riparian areas are reduced compared to hot-season grazing. Short-term benefits under Alternative 3 will not be realized due to the altered condition of riparian habitat from past grazing practices; however, small improvements in the riparian condition over the long term will occur, but not to the degree that the allotment would meet these standards, although fish and amphibian habitat conditions would benefit. Fish are not known to occupy the intermittent tributary to Juniper Creek that falls on public lands in the allotment. However this intermittent stream when flowing does flow into Juniper Creek where fish are present.

Soil compaction: Soils on the BLM-administered public land in the Lequerica FFR allotment are dominated by well- to excessively-drained soils. Use in the spring will only occur once range readiness criteria are met. Direct physical effects to soil will occur to the extent that the permittee uses the allotment when soils are near saturation. In such a case, soil structure alterations would be adverse, and areas of soil degradation would be likely. Adverse effects to soil structure would be avoided to the extent that the permittee defers use until after spring.

However, where compaction occurs, freeze-thaw cycles in the winter will loosen soils and lessen the degree of compaction that may have occurred during the grazing season. Rocks and gravels would continue to be major components of soil stability. Livestock grazing is not the factor that will prevent the allotment from meeting Standard 1 (Watersheds) and ORMP objectives. Overall, both the presence of juniper and past grazing practices have impacted the functionality of the watershed and have resulted in levels of erosion and degradation that should not occur on the site; Standard 1 is not being met for these reasons. Although overall soil conditions will remain the same under Alternative 3, juniper will continue to encroach, increasing the risk of depressed watershed function and accelerated erosion. Ultimately, juniper encroachment, not soil compaction related to livestock grazing, will prevent the allotment from meeting Standard 1 and ORMP objectives over the long term. The proposed level of livestock grazing will have no effect on the rate of encroachment.

Riparian vegetation conditions: As described in the above “*Fish and amphibian habitat conditions*” section, riparian/wetland vegetation will slightly improve in the long term under Alternative 3, but not to the degree that the allotment will make significant progress towards meeting Standards 2 and 3. The allotment is not meeting these standards because of historical grazing practices, not current grazing practices.

Climate change: Climate change is another factor I considered in selecting Alternative 3 for the Lequerica 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. Alternative 3 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 this allotment will be better armed to survive such changes. The native plant health and vigor protected under this alternative will provide resistance and resilience to additional stressors, including climate change.

Upland vegetation and watershed conditions: The allotment is not meeting Standards 1 (Watersheds) and 4 (Native Plant Communities) because of juniper encroachment and historic livestock management practices. Alternative 3 defines specific seasons of use in a 3-year rotation with the same AUMs and stocking rate as Alternative 1. As opposed to Alternative 1, which has total deferment in all years, Alternative 3 defers grazing 2 of 3 years during the critical growth period for upland plants, essentially resulting in a minimum of 2 years deferment for every year of active growing season use. Grazing this way will provide the necessary time between grazing events to allow for upland plants to recovery which will ultimately continue to benefit the health and vigor of upland plant communities.

Alternative 3 would be expected in the short term (less than 10 years) to maintain and potentially over the long term (greater than 10 years) to improve existing upland bunchgrasses in the Lequerica FFR allotment. This is because deferred grazing provides for increased health and vigor

of bunchgrasses by limiting defoliation during the critical growth period when plants are most susceptible to livestock impacts. In addition, this maintained health and vigor of the plant communities provide resilience to better combat further invasion of juniper and invasive grasses.

The effects from past grazing (reduction of large bunchgrasses) and the presence of invasive species (annual grasses and juniper) would still be part of the vegetation community and cause the allotment to not meet Standard 4. Based on the decrease of growing season use, over the long term (greater than 10 years) large bunchgrasses would likely have slow recovery and invasive species are expected to be stable. The ORMP vegetation objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas would be met.

Ultimately, juniper encroachment, not livestock grazing, prevents the allotment from meeting Standard 1 or Standard 4 and ORMP objectives over the long term.

Special status plant species: This issue does not apply to the Lequerica FFR allotment.

Noxious and invasive weeds: There are no mapped populations of noxious weeds on the Lequerica FFR allotment. Any grazing has the potential to introduce and spread invasive weeds and non-native annual grasses through soil surface disturbance and transportation of seed to and from the allotment in fur, on hooves, and in animals' digestive systems. The risk of invasive species spreading is the same under Alternative 3 as under Alternative 1. Although Alternatives 4 and 5 may slightly reduce or eliminate 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. Vegetative community resistance to noxious and invasive annual invasion will increase over time as this more limited grazing strategy is implemented. Although the allotment would still not meet or make significant progress toward meeting Standard 4 because of limitations from juniper encroachment and past livestock grazing that reduced large bunchgrasses and invasive plants, improvement in upland vegetation conditions are expected in the long term (greater than 10 years). Alternative 3 would meet the ORMP vegetation management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition.

Livestock trailing⁷: No new trailing routes were identified in the Lequerica FFR allotment, and no new trailing routes were proposed. Trailing or moving animals across Federal, State, or private land is a component of regular grazing management practices in the South Mountain Group allotments. Livestock are primarily actively trailed on existing roads, where no or limited forage is consumed, and the trailing occurs for short durations. For the majority of situations, trailing activities have not been documented, nor are they expected to substantially affect resources. Thus, they are not affecting the ability of this allotment to meet or make significant progress toward meeting the Standards.

Cultural resources: No recorded cultural sites occur within the Lequerica FFR allotment.

⁷ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0022-EA, Section 2.1.3.

Paleontological resources: No recorded fossil sites are within the South Mountain Group. The lack of fossil discoveries can be directly related to the absence of any fossil-bearing strata underlying the allotments.

Wildfire fuels: 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 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 Lequerica 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, specifically within seedings of grazing-tolerant introduced grasses and annual grasses, conditions that do not exist on the Lequerica FFR allotment. 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 this allotment at this time. The BLM's current permit renewal is focused on improving native upland and riparian plant communities on the allotments, and targeted grazing to create fuel breaks would not support that improvement.

The selected alternative retains a level of grazing use that reduces the accumulation of fine fuels, and thus will lessen the spread of large wildfires when fire weather conditions are less extreme. More importantly, it is designed to benefit and promote the health and vigor of native perennial species on the allotment, thereby limiting the dominance of annual species and so limiting the accumulation of continuous fine fuels and extreme fire behavior, while enhancing post-fire recovery.⁸

Socioeconomic impacts: During the NEPA and public comment process, some raised the concern that selection of certain alternatives considered in the EA could impact regional socioeconomic 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. Pasture rotations and different grazing seasons may result in increased labor and feed costs. However, as noted above, I have selected Alternative 3 for the Lequerica FFR allotment in large part because the selection will accomplish Idaho S&G and ORMP objectives.

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

⁸ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0022-EA, Section 2.3 Wildfire Fuels (Alternative 8).

of an alternative based on unsustainable grazing practices that do not meet Idaho S&Gs would result in less reliable amounts of forage over the long-term, in addition to reducing economic opportunities from derived from healthy ecosystems and alternate socioeconomic resources, such as recreation, that rely on healthy, functional, and aesthetically pleasing open spaces and wildlife habitats.

I have considered a wide range of issues at the allotment level, including the social and economic impacts that result from modifying grazing authorizations. I have minimized reductions in grazing use levels where current levels are compatible with meeting Idaho S&Gs and ORMP objectives and, where not compatible, have attempted to select alternatives designed to meet resource needs. In cases of particular or particularly acute resource needs, I have selected the alternative most responsive to such needs, with the aim of best promoting rangeland health.

Additional Rationale

Much thought and effort went into developing grazing management that is responsive to this allotment's specific resource needs, geography, and size. These considerations were made to address all concerns and requirements mandated to the BLM. Each allotment has different ecology and management capability due to the size and location/topography. All attempts to coordinate grazing throughout the entire allotment were made by me and my staff with you and the interested public. I recognize the difficulty of not only meeting the mandated needs for the resources, but also meeting the needs and capability that you, the permittee, have. I believe I have balanced those needs of the resource and your capabilities with the information I have to the extent possible.

During this permit renewal process, LU ranch and Lequerica and Sons did agree to transfer three AUMs from Lequerica and Sons to LU Ranch. The transfer of AUMs was needed to address livestock use by LU ranch in pasture 2. I have transferred the preference of three AUMs to LU ranch. As part of the transfer application, LU ranch requested the season of use be from December 1 to December 31 for 365 days for pasture 2. I do deny the application that would allow season-long use for 365 days per year. I have denied this request because your current use is in the fall, and I believe that Alternative 3 would meet your grazing needs while also meeting the needs of the BLM resources.

I do believe that Alternative 3 will provide each permittee the ability to use their individual pasture while also meeting the BLM requirement to maintain or improve public lands within the allotment. Currently, pasture 1 has been grazed in the fall most years based on Actual Use. Alternative 3 would continue to allow this use. Based on communication with and from LU ranch pasture 2 has also been used in the fall. Alternative 3 would continue to allow this use. For this reason I believe Alternative 3 would meet both your needs while ensuring the BLM meets our requirement to manage resources.

While I did consider selecting Alternative 5 (No Grazing) for this allotment, 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 Lequerica 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 operation and on regional economic activity, and (3) your past performance under previous permits. The resource issues identified are primarily related to the improper seasons and site-specific intensities of grazing use. By implementing Alternative 3, the resource issues identified will be addressed. The suspension of grazing for a 10-year period is not the management decision most appropriate at this time in light of these factors.

Conclusion

In conclusion, it is my decision to select Alternative 3 for the Lequerica FFR allotment over other alternatives because livestock management practices under this selection meet the ORMP objectives allotment-wide and the implementation of Alternative 3 will not cause the Lequerica FFR allotment to not meet Idaho S&Gs because of the proposed livestock management practices. Alternative 5 removes economic activity from Owyhee County and southwest Idaho, a region where livestock production and agriculture is a large portion of the economy. That, in conjunction with current resource conditions and the improvement anticipated by implementation of Alternative 3, lead me to believe elimination of livestock grazing from the Lequerica FFR allotment is unnecessary at this point.

Authority

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

- 4100.0-8 Land use plans. The ORMP designates the Lequerica FFR allotment available for livestock grazing;
- 4130.2 Grazing permits or leases. Grazing permits may be issued to qualified applicants on lands designated as available for livestock grazing. Grazing permits shall be issued for a term of 10 years unless the authorized officer determines that a lesser term is in the best interest of sound management;
- 4130.3 Terms and conditions. Grazing permits must specify the term and conditions that are needed to achieve desired resource conditions, including both mandatory and other terms and conditions;
- 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.
- 4110.2-3 Transfer of grazing preference; and
- 4110.2-4 Allotments.

Right of Protest and/or Appeal

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,



Loretta V. Chandler
Owyhee Field Manager

Copies sent to:

- See Attached Group 4 Proposed Decisions Mailing List

Group 4 - Proposed Decision Mailing List

Organization	Name		Address	City	ST	Zip	#
Friends of Mustangs	Robert	Amidon	8699 Gantz Ave.	Boise	ID	83709	1
Soil Conservation District	Cindy	Bachman	PO Box 186	Bruneau	ID	83604	2
	Bill	Baker	2432 N. Washington	Emmett	ID	83617-9126	3
	Conrad	Bateman	740 Yakima St.	Vale	OR	97918	4
Idaho Dept. of Agriculture	John	Biar	PO Box 790	Boise	ID	83707	5
Boise District Grazing Board	Stan	Boyd	PO Box 2596	Boise	ID	83701	6
	Craig & Rhonda	Brasher	4401 Edison	Marsin	ID	86369	7
	Gene	Bray	5654 W El Gato Ln.	Meridian	ID	83642	8
Colyer Cattle Co.	Ray & Bonnie	Colyer	31001 Colyer Rd.	Bruneau	ID	83604	9
	Senator: Mike	Crapo	251 East Front Street STE 205	Boise	ID	83702	10
Owyhee County Natural Resources Committee	Jim	Desmond	PO Box 38	Murphy	ID	83650	11
	Frankie	Dougal	36693 Juniper Mtn. Rd	Jordan Valley	OR	97910	12
Land & Water Fund	William	Eddie	PO Box 1612	Boise	ID	83701	13
	Thenon & Jana	Elordi	59010 Van Buren	Thermal	CA	92274	14
Western Watershed Projects	Katie	Fite	PO Box 2863	Boise	ID	83701	15
Gusman Ranch Grazing Association LLC	Forest	Fretwell	27058 Pleasant Valley Rd.	Jordan Valley	OR	97910	16
	Chad	Gibson	16770 Agate Ln.	Wilder	ID	83676	17
Resource Advisory Council	Chair: Gene	Gray	2393 Watts Lane	Payette	ID	83661	18

Organization	Name		Address	City	ST	Zip	#
	Russ	Heughins	10370 W Landmark Ct.	Boise	ID	83704	19
Jaca Livestock	Elias	Jaca	817 Blaine Ave.	Nampa	ID	83651	20
Idaho Wild Sheep Foundation	President: Jim	Jeffress	PO BOX 8224	Boise	ID	82707	21
	Dan	Jordan	30911 Hwy. 78	Oreana	ID	83650	22
	Floyd	Kelly Breach	9674 Hardtrigger Rd.	Given Springs	ID	83641	23
	Kenny	Kershner	PO Box 300	Jordan Valley	OR	97910	24
	Vernon	Kershner	PO Box 38	Jordan Valley	OR	97910	25
	Lloyd	Knight	PO Box 47	Hammett	ID	83627	26
	Congressman: Raul	Labrador	33 E. Broadway Ave STE 251	Meridian	ID	83642	27
Corral Creek Crazing Assoc.	Tim	Lequerica	P.O. Box 135	Arock	OR	97902	28
The Fund for the Animals, Inc.	Andrea	Lococo	1363 Overbacker	Louisville	KY	40208	29
LU Ranching	Bill	Lowry	PO Box 132	Jordan Valley	OR	97910	30
LU Ranching	Tim	Lowry	PO Box 132	Jordan Valley	OR	97910	31
Idaho Wild Sheep Foundation	Herb	Meyr	570 E 16th N.	Mountain Home	ID	83647	32
R&S Enterprise	Ray	Mitchell	265 Millard Rd.	Shoshone	ID	83352	33
	Sandra	Mitchell	PO Box 70001	Boise	ID	83707	34
	Ed	Moser	22901 N. Lansing Ln.	Middleton	ID	83644	35
	Brett	Nelson	9127 W. Preece St.	Boise	ID	83704	36
	Ramona	Pascoe	PO Box 126	Jordan Valley	OR	97910	37
	Anthony & Brenda	Richards	8935 Whiskey Mtn. Rd.	Murphy	ID	83650	38
-	John	Richards	8933 State Hwy. 78	Marsing	ID	83639	39

Organization	Name		Address	City	ST	Zip	#
	Senator: James E.	Risch	350 N 9th Street STE 302	Boise	ID	83702	40
Idaho Conservation League	John	Robison	PO Box 844	Boise	ID	83701	41
	John	Romero	17000 2X Ranch Rd.	Murphy	ID	83650	42
	Bob	Salter	6109 N. River Glenn	Garden City	ID	83714	43
Intermountain Range Consultants	Bob	Schweigert	5700 Dimick Ln.	Winnemucca	NV	89445	44
	Congressman: Mike	Simpson	802 West Bannock STE 600	Boise	ID	83702	45
Shoshone-Bannock Tribes	Tribal Chair: Nathan	Small	PO Box 306	Ft. Hall	ID	83203	46
Juniper Mtn. Grazing Association	Michael	Stanford	3581 Cliffs Rd.	Jordan Valley	OR	97910	47
	Doug	Terry	P.O. Box 11	Jordan Valley	OR	97910	48
	John	Townsend	8306 Road 3.2 NE	Moses Lake	WA	98837	49
Moore Smith Buxton & Turcke	Paul	Turcke	950 W. Bannock, Ste. 520	Boise	ID	83702	50
Natural Resources Defence Council	Johanna	Wald	111 Sutter St., 20 th Floor	San Francisco	CA	94104	51
Office of Species Conservation	Cally	Younger	304 N. 8 th STE 149	Boise	ID	83702	52
Owyhee County Commissioners			PO Box 128	Murphy	ID	83650	53
Holland & Hart LLP			PO Box 2527	Boise	ID	83701	54
Idaho Cattle Association			PO Box 15397	Boise	ID	83715	55
IDEQ			1410 N. Hilton	Boise	ID	83701	56
Idaho Dept. of Lands			PO Box 83720	Boise	ID	83720	57
Idaho Farm Bureau Fed.			PO Box 167	Boise	ID	83701	58

Organization	Name		Address	City	ST	Zip	#
International Society for the Protection of Horses & Burros	Karen	Sussman	PO Box 55	Lantry	SD	57636	59
Larrusea Cattle Co			P.O. Box 124	Arock	OR	97902	60
Oregon Division State Lands			1645 NE Forbes Rd., Ste. 112	Bend	OR	97701	61
Owyhee Cattlemen's Association			PO Box 400	Marsing	ID	83639	62
Schroeder & Lezamiz Law Offices			PO Box 267	Boise	ID	83701	63
Sierra Club			PO Box 552	Boise	ID	83701	64
State Historic Preservation Office			210 Main St.	Boise	ID	83702	65
State of Nevada Div. of Wildlife			60 Youth Center Rd.	Elko	NV	89801	66
The Nature Conservancy			950 W. Bannock, Ste. 210	Boise	ID	83702	67
The Wilderness Society			950 W. Bannock St., Ste. 605	Boise	ID	83702-5999	68
U.S.F.W.S. Idaho State Office			1387 S. Vinnell Way, Ste. 368	Boise	ID	83709	69
USDA Farm Services			9173 W. Barnes	Boise	ID	83704	70
Western Watershed Projects			PO Box 1770	Hailey	ID	83333	71