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BUREAU OF LAND MANAGEMENT  
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In Reply Refer To:  
4160 ID130

March 28, 2014

**CERTIFIED MAIL - RETURN RECEIPT REQUESTED**

Frankie Dougal  
36693 Juniper Mtn Road  
Jordan Valley, OR 97910

**Notice of Field Manager's Final Decision  
for the South Dougal and Dougal FFR Allotments**

Dear Permittee:

Thank you for your applications to renew grazing permits on the South Dougal and Dougal Fenced Federal Range (FFR) allotments, and for working with us throughout the permit renewal process.<sup>1</sup> A Proposed Decision to renew grazing on these allotments was signed on January 24, 2014. The Proposed Decision included a decision to select Alternative 3 for the South Dougal allotment and Alternative 1 for the Dougal FFR allotment. Under these alternatives, livestock management practices meet the Owyhee Resource Management Plan (ORMP) objectives allotment-wide and the Idaho Rangeland Health Standards and Guidelines (Idaho S&Gs) consistent with the projected ability of BLM to oversee grazing on these allotments over the next 10 years. You received that Proposed Decision on January 24, 2014; we did not receive protest letters from you but we did meet with you on February 4, 2014, to address your concerns. During this meeting, we discussed how Alternative 3 for the South Dougal allotment could work within your livestock operation even though it was not optimal. After the meeting, you agreed to proceed with the proposed decision; you did not discuss the Dougal FFR allotment with us.

Alternative livestock grazing management practices for permit renewal within the Sheep Creek, South Dougal, and Dougal FFR allotments were analyzed through the NEPA process associated with Group 4 of the Owyhee 68. Similarly, the Boone Peak, Bridge Creek, Red Mountain, Quicksilver FFR, Stahle FFR, and Moore FFR allotments were analyzed with Group 3 and the Feltwell allotment was analyzed with Group 5. They were not themselves part of the 2008 Stipulated Settlement Agreement nor subject to its completion deadlines, and Final Decisions addressing them are now being issued. These allotments were included and analyzed in the relevant NEPA documents because of their location in the watersheds.

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<sup>1</sup> 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.

The BLM received other protests regarding the Proposed Decision from Western Watersheds Project and from the Idaho Governor's Office. All Group 4 protest points raised within the submissions received and my responses are provided in the attached document titled Protest Responses – South Mountain Group Non-68 Allotments. Protest points applicable to your allotment are from the protesters mentioned above and include responses to range improvement projects, stocking rates, and how state land grazing is being effected.

## Background

As you know, the BLM recently evaluated current grazing practices and conditions on your allotments. 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 Final Decision incorporates those documents by reference and the information contained therein.

On January 11, 2013, the Owyhee Field Office initiated the public scoping process for the Toy Mountain, South Mountain, and Morgan groups of grazing allotments, Groups 3, 4, and 5, respectively. A scoping letter informed recipients that the purpose of the public outreach effort was to identify resource and management issues associated with Idaho S&Gs and the ORMP. This effort helped develop grazing management alternatives for three grazing permit renewal Environmental Assessments (EA), including the South Mountain Group EA # DOI-BLM-ID-B030-2013-0022-EA. The Final South Mountain Group EA, which was published on November 21, 2013, tiers to and 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 Final Decision incorporates by reference the analysis contained in those documents.

In addition to the scoping period identified above, members from the National Environmental Policy Act (NEPA) Permit Renewal Team met with you on January 30, and July 11, 2013, to discuss your grazing permit renewal application, current allotment conditions, and your livestock operations within this allotment. During these meetings, the BLM discussed with you our preliminary conclusions regarding the Idaho S&Gs and made grazing management recommendations associated with your grazing permit renewal application.

On August 30, 2013, BLM issued the completed 2013 rangeland health assessments, evaluations, and determinations for the South Mountain Group allotments. Issuance of the Rangeland Health Assessments 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 South Mountain Group 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 South Dougal and Dougal FFR allotments. These resource condition concerns are not related to current livestock management practices for the Dougal FFR allotment; on the South Dougal allotment, current livestock grazing management was determined to be causal factor for not meeting Standards 2, 3, and 8.

With the focus of addressing livestock grazing’s impacts to public land resources, my office prepared and issued the South Mountain Group EA,<sup>2</sup> 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 natural resources on both allotments conform to the goals and objectives of the ORMP and the Idaho S&Gs. This Final Decision incorporates by reference the analysis contained in the EA.

Following public availability of the BLM’s Proposed Decision and review of protest points, I am now prepared to issue a Final Decision to renew your permit to graze livestock within your allotments.

This Final 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 South Dougal and Dougal FFR allotments;
- Outline my Final Decision to select Alternative 3 in the South Dougal allotment and Alternative 1 in the Dougal FFR allotment; and
- State the reasons I made that selection.

***Allotment Setting***

These allotments lie within the Owyhee Uplands, a sagebrush steppe semi-arid landscape of shrubs and widely spaced bunchgrasses where native vegetation communities are diverse. Limited precipitation with cold winters and dry summers constrain plant communities and wildlife habitat potential. The South Dougal and Dougal FFR<sup>3</sup> allotments are composed of three major ecological sites. They include a Shallow Claypan low sagebrush/Idaho fescue site, a Loamy mountain big sagebrush/bluebunch wheatgrass-Idaho fescue site, and a Very Shallow Stony Loam low sagebrush/Sandberg bluegrass-bluebunch wheatgrass site.

The Dougal FFR allotment is located in Owyhee County 28 miles southwest of Silver City, Idaho, near the Idaho/Oregon state line (Map 1). The South Dougal allotment borders the Dougal FFR allotment to the west (Map 2). Within the Dougal FFR allotment, cross fences divide the allotment into nine smaller pastures with 90 AUMs of permitted grazing. Within these pastures are irrigation reservoirs, the ranch headquarters and numerous out-buildings and hay fields. Most of the land within the Dougal FFR allotment is privately owned. The South Dougal allotment is split into two pastures with 374 AUMs of permitted use. Most of the lands within the South Dougal allotment are managed by the BLM. Resource concerns identified for both allotments included the ecological condition of vegetation communities, perennial surface water presence, and riparian/wetland ecosystems. A summary of the acres of land are provided in Table ALLOT-1 and Table ALLOT-2.

**Table ALLOT-1:** Dougal FFR allotment (acres)

Pastures	Public	State	Private	Total
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<sup>2</sup> 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.

<sup>3</sup> 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.

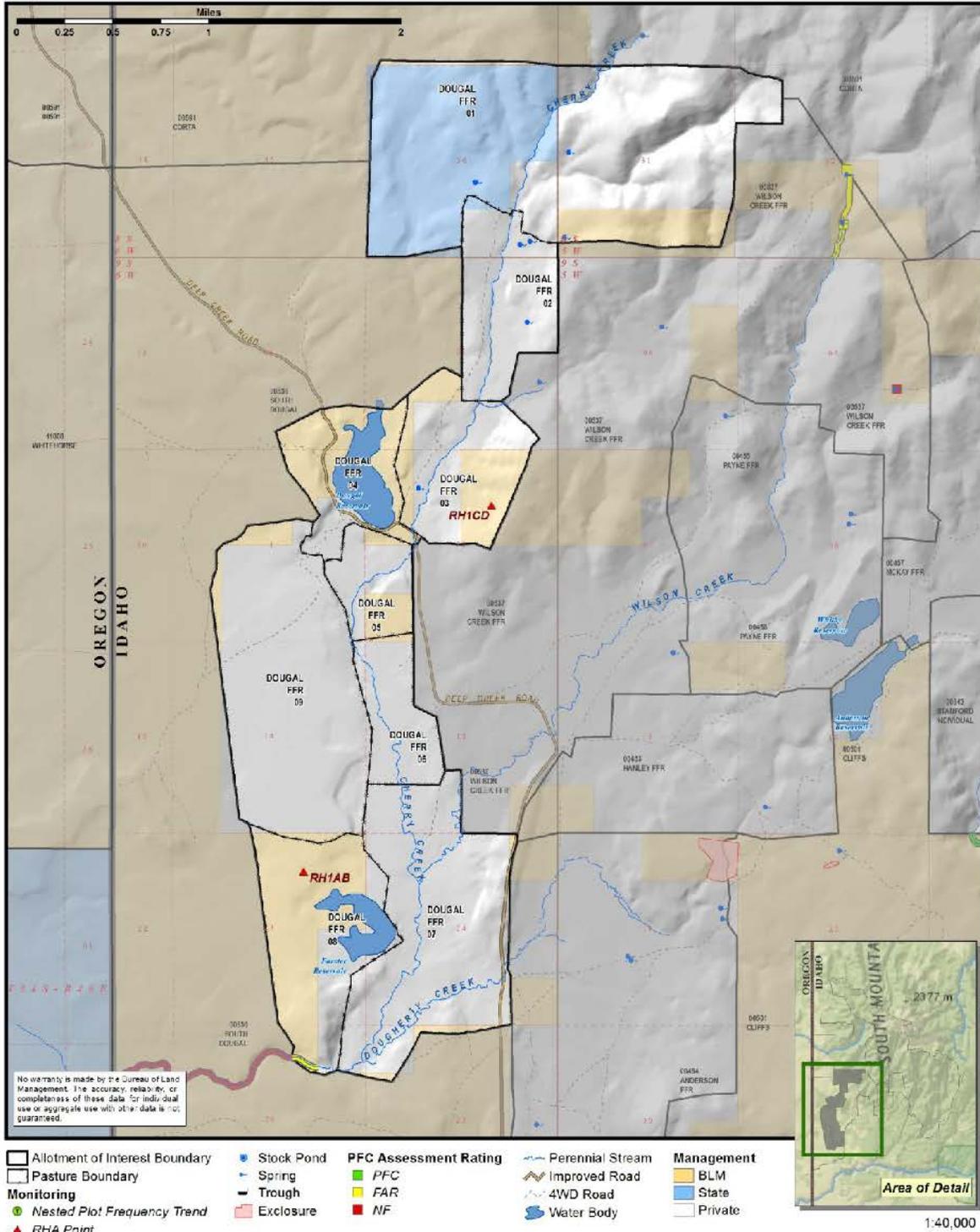
Pastures	Public	State	Private	Total
1	115	497	541	
2	1	5	262	
3	134		171	
4	200		45	
5	44		91	
6	45		118	
7	20		600	
8	268		123	
9	43		640	
Total	868 (22%)	502 (13%)	2,590 (65%)	3,961 (100%)

**Table ALLOT-2:** South Dougal allotment (0536) (acres)

Pastures	Public	State	Private	Total
1	2261	9	30	
2	1919	2	10	
Total	4,180 (99%)	11	40 (1%)	4,230 (100%)

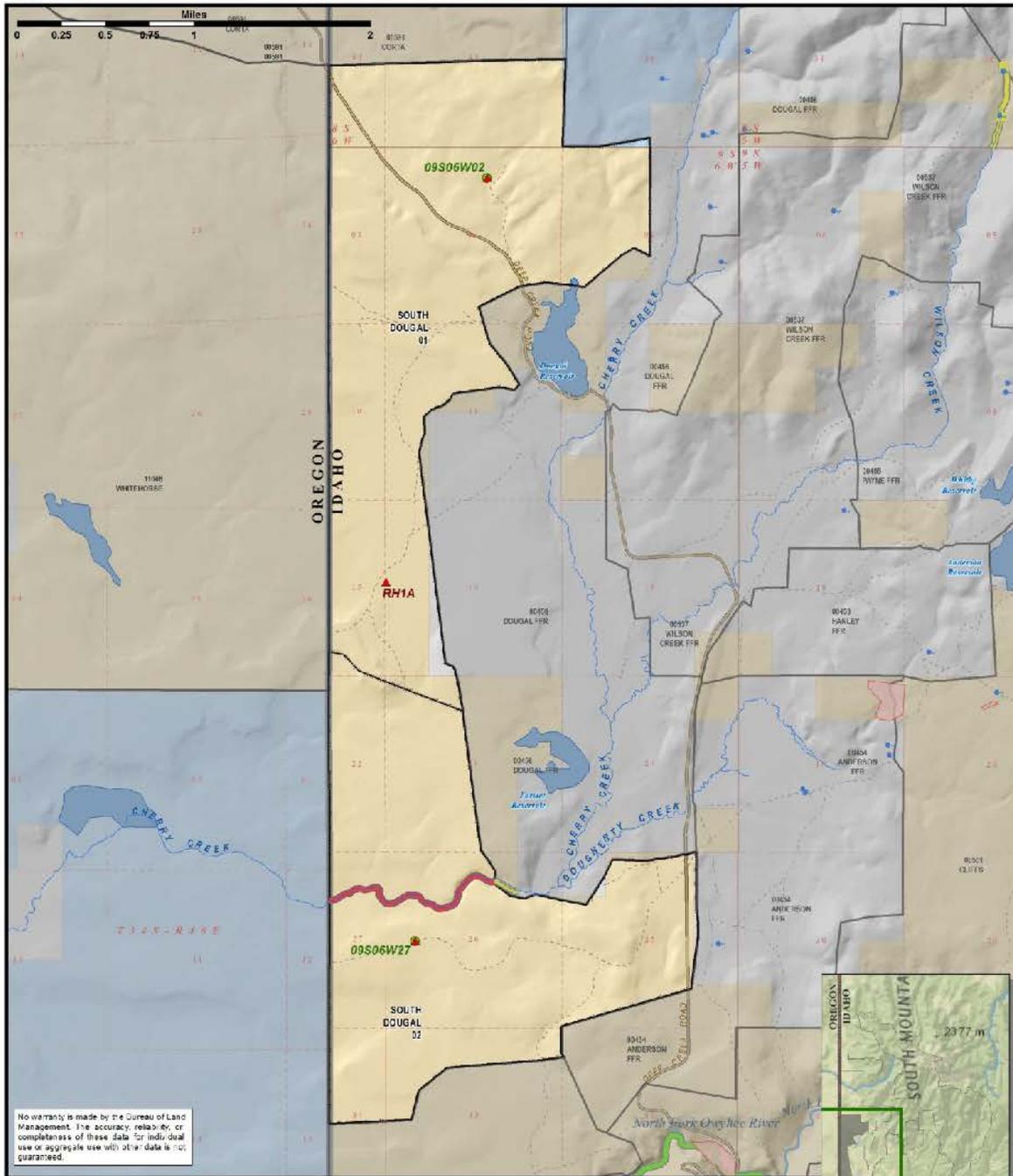


# Map 1: Dougal FFR (00456) Allotment





# Map 2: South Dougal (00536) 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
<b>Monitoring</b>	Trough	FAR	4WD Road	State
Nested Plot Frequency Trend	Exclosure	NF	Water Body	Private
RHA Point				



## *Current Grazing Authorization*

You are currently authorized to graze livestock within the South Dougal and Dougal FFR allotment in accordance with permits issued by the BLM. The terms and conditions of those grazing permits are as follows:

**Table LVST-1:** Permitted grazing use within the South Dougal and Dougal FFR

<b>Allotment Name</b>	<b>Active Use</b>	<b>Suspension</b>	<b>Permitted Use</b>
South Dougal	374 AUMs	253 AUMs	627 AUMs
Dougal FFR	90 AUMs	0 AUMs	90 AUMs

In accordance with the current permit, Table 2 AUMs (387AUMs,) are at or above your Active Use AUMs for the South Dougal allotment. Grazing above the Active Use AUMs (387 AUMs) is not permitted.

**Table LVST-2:** Mandatory and other terms and conditions

<b>Allotment</b>	<b>Livestock</b>		<b>Grazing Period</b>		<b>% PL</b>	<b>Type Use</b>	<b>AUMs</b>
	<b>Number</b>	<b>Kind</b>	<b>Begin</b>	<b>End</b>			
South Dougal	102	Cattle	6/12	9/30	100	Active	387
Dougal FFR	88	Cattle	12/01	12/31	100	Active	90

The following Terms and Conditions apply to the above permits:

1. Turnout is subject to Boise District Range Readiness Criteria.
2. Your certified actual use report is due within 15 days of completing your authorized annual grazing use.
3. Salt and/or supplement shall not be placed within one quarter (1/4)-mile of springs, streams, meadows, aspen stands, playas or water developments.
4. Changes to the scheduled use require prior approval.
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. Livestock exclosures located within your grazing allotments are closed to all domestic grazing use.
7. Range improvements must be maintained in accordance with the cooperative agreements and range improvement permits in which you are a signator or assignee. All maintenance of range improvements within a wilderness study area requires prior consultation with the authorized officer.
8. All appropriate documentation regarding base property leases, lands 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.
9. Failure to pay the grazing bill within 15 days of the due date specified shall result in a late fee assessment of \$15.00 or 10 percent of the grazing bill, whichever is greater, not to exceed \$150.00. 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) and shall result in action by the authorized officer under 43 CFR 4150.1 and 4160.1.
10. Livestock grazing will be in accordance with your allotment grazing schematic(s). Changes in scheduled pasture use dates will require prior authorization.
11. Utilization may not exceed 50 percent of the current year's growth.
12. The number of livestock and season of use on the fenced federal range (FFR) allotment 0456 Dougal FFR is at your discretion.
13. All grazing within the 00536 South Dougal allotment will be in accordance with your existing AMP.

## ***Livestock Management***

Since 1997, the Dougal FFR allotment has been used primarily year-round, with all AUMs being billed for. Since 1997, the South Dougal allotment has primarily been used from 6/12 to 9/30, with 374 AUMs used each year<sup>4</sup>. The allotment has had an allotment management plan (AMP) since 1984; based on actual use records, the AMP has been followed since 2006. From 1997 to 2006, the actual use information is not accurate enough to determine if or how grazing followed the AMP grazing system.

## ***Resource Conditions***

A rangeland health assessment was completed for the South Dougal allotment in 2006, which was subsequently updated with an evaluation and determination completed for the allotment in 2013.

Standards 1 (Watersheds), 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain), 4 (Native Plant Communities), and 8 (Threatened and Endangered Plants and Animals) of the applicable standards for rangeland health are not being met in the South Dougal allotment; Standards 5 (Seedings), 6 (Exotic Plant Communities), and 7 (Water Quality) are not applicable to resources present within the allotment. Current livestock grazing management practices are a significant factor in failing to meet Standards 2, 3, and 8. However, current livestock grazing management practices are not a significant factor in failing to meet Standards 1 and 4. Livestock management practices do not conform to the applicable livestock grazing management Guidelines 4, 5, and 7 for several standards.

A rangeland health assessment was completed for the Dougal FFR allotment in 2006, which was subsequently updated with an evaluation and determination completed for the allotment in 2013.

Standards 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain), and 4 (Native Plant Communities) of the applicable standards for rangeland health are not being met in the Dougal Fenced in Federal Range (FFR) allotment; Standards 1 (Watershed) and 8 (Threatened and Endangered Plants and Animals) are met; and Standards 5 (Seedings), 6 (Exotic Plant Communities), and 7 (Water Quality) are not applicable to resources present within the allotment. Current livestock grazing management practices are not significant factors in failing to meet Standards 2, 3, and 4.

## ***Vegetation - Uplands***

### South Dougal<sup>5</sup>

The South Dougal allotment is not meeting the Standard for Native Plant Communities (Standard 4) because invasive species (juniper and bulbous bluegrass) currently compete with native perennial shrub, bunchgrass, and forb species. A sagebrush die-off and simultaneous invasion of bulbous bluegrass are the main contributors for not meeting Standard 4, with juniper encroachment of less significance. Past grazing from the late 1800s and early 20<sup>th</sup> century is largely responsible for major shifts in vegetation functional/structural groups, from deep-rooted perennials to shallow-rooted perennials (National Research Council, 1994). This disturbance event was also a time of non-native grass invasion. The sagebrush die-off provided a prime opportunity for a bulbous bluegrass invasion; however, the resident native perennial bunchgrass have maintained current condition over the last 23 years. Even though vegetation communities have shifted to a greater dominance of shallow-rooted native perennial bunchgrass species, and there has been a decline in larger deep-rooted native perennial bunchgrasses with an influx of bulbous bluegrass, the native vegetation appears to be retaining an adequate composition to conclude that proper nutrient cycling,

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<sup>4</sup> Animal unit month (AUM) means the amount of forage necessary for the sustenance of one cow or its equivalent for a period of one month.

<sup>5</sup> For more detailed discussion, please refer to Sections 3.3.1.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

hydrologic cycling, and energy flow are provided. Livestock grazing is not a significant factor in this allotment's not meeting this Standard.

#### Dougal FFR<sup>6</sup>

The Dougal FFR allotment is not meeting Standard 4 for Native Plant Communities because juniper has encroached into vegetation communities that should not include juniper (in excess of a few scattered trees) and is competing with native perennial shrub, bunchgrass, and forb species. Past grazing and an extended fire frequency from natural disturbance regimes contribute to juniper invasion and, subsequently, the failure to meet the Standard. In addition, pastures 3 and 8 are not meeting due to invasive grasses. The depressed ecological condition (imbalance of deep-rooted to shallow-rooted native bunchgrasses) of the Dougal FFR allotment is largely a product of grazing management practices in the late 1800s and early 20<sup>th</sup> century (National Research Council, 1994). Even though vegetation communities have shifted to a greater dominance of shallow-rooted native perennial bunchgrass species and non-native annuals and a decline in larger deep-rooted native perennial bunchgrasses, remnant vegetation communities in portions of the allotment not dominated by juniper encroachment or subject to invasive grasses retain an adequate composition of native perennial species to conclude that proper nutrient cycling, hydrologic cycling, and energy flow are provided. Livestock grazing is not a significant factor in this allotment not meeting this standard.

#### **Watersheds**

##### South Dougal<sup>7</sup>

The allotment does not meet this Standard, but livestock grazing is not a causal factor because the watershed lacks the shrub community necessary for proper hydrologic function, energy flow, and nutrient cycling. The over-abundance of bulbous bluegrass further amplifies depressed watershed conditions. However, long-term trend data suggest maintenance of the deep-rooted perennial grass group. Decreases in bare ground and the continued presence of non-persistent litter further suggest that residual vegetation is left each year to decompose in place, aiding soil stability and watershed function. Despite areas of low shrub cover and bulbous bluegrass invasion, qualitative evaluations in 2001 and 2013 demonstrate no accelerated erosional processes for the dominant ecological sites in the allotment.

##### Dougal FFR<sup>8</sup>

The allotment meets the watershed standard. Field evaluation information from 2001 suggests that vegetative cover and plant vigor in the allotment were adequate for watershed function. A compaction layer around Foster Reservoir does not appear to be affecting plant productivity or energy flow. Indicators of accelerated erosion were generally not apparent, except near Foster Reservoir, a likely congregation area for livestock. Erosional features were appropriate in terms of scale and magnitude for the major ecological sites in the allotment. Upland utilization data from 2011 documented light to no apparent use in portions of the allotment, with average stubble heights of upland bunch grasses at 24 inches.

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<sup>6</sup> For more detailed discussion, please refer to Sections 3.3.5.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

<sup>7</sup> For more detailed discussion, please refer to Sections 3.3.5.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

<sup>8</sup> For more detailed discussion, please refer to Sections 3.3.1.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

## Water Resources and Riparian/Wetland Areas

### South Dougal<sup>9</sup>

Cherry Creek is not properly functioning in pasture 2 of the South Dougal allotment, and livestock grazing is a significant factor limiting stream recovery. Riparian/wetland vegetation with deep-rooted, binding ability was largely missing and not sufficient to stabilize streambanks. The riparian vegetation had low vigor, and the composition, age class, and structural diversity were not appropriate. Although the reach is also affected by flow alteration associated with the reservoir, the PFC indicators identify direct impacts associated with grazing.

### Dougal FFR<sup>10</sup>

Riparian vegetation is limited to less than ¼-mile of Cherry Creek within pasture 4 of the allotment. The reach is associated with the outflow from reservoirs that may have breached at one time. The channel is deeply incised with eroding banks and inadequate deep-rooted riparian species. The floodplain is not accessed by spring flows and riparian vegetation is sparse and has low vigor. Because the short reach of channel is influenced by the reservoir and other flow modifications, livestock grazing was not identified as the causal factor for not meeting the Standard.

## Special Status Plants

### South Dougal<sup>11</sup>

Based on available information on thinleaf goldenhead, Standard 8 is being met. The thinleaf goldenhead occurrence and habitat condition do not appear limiting for this plant, as displayed by its excellent vigor and apparent resilience to the minimal disturbances that are present. During the recent site visit of thinleaf goldenhead in pasture 1, observations of healthy vigorous plants were made with minimal competition from weeds and no significant impacts from livestock grazing or trampling were observed.

### Dougal FFR<sup>12</sup>

Based on available information on thinleaf goldenhead and harlequin calicoflower, Standard 8 is being met. The survey populations appeared healthy and with minimal impacts from livestock grazing. Population vigor was reported as excellent with over ninety percent of the population in flower. The ephemeral wet swales within the low sagebrush/Idaho fescue plant community were generally intact with low non-native plant cover (bulbous bluegrass). The surrounding landscape was partially fragmented due to roads, juniper and bulbous bluegrass invasion, with ecological and hydrological processes intact. Weeds were present, but competition with weeds was not a substantial impact to the species. Recent information on harlequin calicoflower is incomplete, but it is likely that current use (assuming early removal) is not significantly affecting habitat because the plant has the opportunity to set at least some seed before the grazing period.

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<sup>9</sup> For more detailed discussion, please refer to Sections 3.3.5.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

<sup>10</sup> For more detailed discussion, please refer to Sections 3.3.1.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

<sup>11</sup> For more detailed discussion, please refer to Sections 3.3.5.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

<sup>12</sup> For more detailed discussion, please refer to Sections 3.3.1.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

## Wildlife/Wildlife Habitats and Special Status Animals

### South Dougal<sup>13</sup>

The South Dougal allotment is not meeting Standard 8 for special status animal species, due primarily to non-functioning riparian conditions that do not support riparian-dependent animals. Current livestock grazing management practices are significant factors leading to this determination. In the uplands, the South Dougal allotment has suffered a loss of sagebrush through die-off and an increase in invasive plants, including juniper. For upland habitats, current livestock grazing management practices are not a significant factor.

### Dougal FFR<sup>14</sup>

The Dougal FFR allotment is meeting Standard 8. Data and site visits indicate uplands are functioning and providing the overall structural needs for special status animal species. Escape and thermal cover, as well as herbaceous components, are largely present. However, juniper has increased and is close to being a causal factor leading to a reduction in habitat quality. Many of the pastures visited had adequate forb cover and diversity, deep-rooted grasses, and sagebrush as expected for the site. Five sage-grouse habitat assessments revealed marginal breeding habitat largely due to site potential.

Based primarily on interpretations of data gathered in support of Standards 2 and 4, along with five sage-grouse breeding habitat assessments in four pastures, Standard 8 is being met for special status animal species. Riparian areas were found to not be meeting the Standard and current livestock grazing management practices are not significant factors.

### ***Guidelines for Livestock Grazing Management***

In addition to a discussion of land health standards, the BLMs 2013 Determination South Dougal identified that grazing management practices did not conform to BLM's Guidelines for Livestock Grazing management for Idaho. Dougal FFR conformed to BLM Guidelines for Livestock Grazing Management for Idaho

Nonconformance to BLM Guidelines for the South Dougal Allotment:

*Guideline 4: Implement grazing management practices that provide periodic rest or deferment during critical growth stages to allow sufficient regrowth to achieve and maintain healthy, properly functioning conditions, including good plant vigor and adequate cover appropriate to site potential.*

*Guideline 5: Maintain or promote grazing management practices that provide sufficient residual vegetation to improve, restore, or maintain healthy riparian-wetland functions and structure for energy dissipation, sediment capture, ground water recharge, streambank stability, and wildlife habitat appropriate to site potential.*

*Guideline 7: Apply grazing management practices to maintain, promote, or progress toward appropriate stream channel and streambank morphology and function. Adverse impacts due to livestock grazing will be addressed.*

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<sup>13</sup> For more detailed discussion, please refer to Sections 3.3.5.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

<sup>14</sup> For more detailed discussion, please refer to Sections 3.3.1.1 of the EA number DOI-BLM-ID-B030-2013-0022-EA and Appendix E.

Since the South Dougal allotment is not meeting one or more of the Idaho S&Gs because of current livestock management practices, the BLM used these guidelines as a starting point for developing grazing schemes to bring the authorized actions within the allotment into compliance with resource objectives.

### *Issues*

Throughout the internal and external (public) scoping process and project development period, the BLM interdisciplinary team identified the issues concerning livestock grazing management in one or more of the South Mountain group allotments. The identified issues that may be applicable to these allotments are listed below:

1. *Habitat conditions for greater sage-grouse (Centrocercus urophasianus)*, from this point on referred to as 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 CO<sub>2</sub> 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 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 Dougal FFR and South Dougal 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 South Dougal and Dougal FFR allotments and the issues identified above, the BLM considered a number of alternative livestock management schemes in the EA to ensure that any renewed grazing permit would result in maintaining or improving satisfactory conditions and continuing to provide for significant progress toward meeting standards where unsatisfactory conditions have been identified on the allotments. Overall, five alternatives were considered and analyzed in the EA. The range of alternatives developed include: Alternative 1 - Current Condition, Alternative 2 - Permittee's Application, and Alternative 5 - No Grazing, as well as Alternatives 3 and 4, which were developed based on resource constraints. The following sections describe the allotment-specific authorizations and actions under each alternative.

**Alternative 1** would allow a continuation of current management on the allotments.

### Dougal FFR

The BLM would permit 88 cattle from 12/1 to 12/31 on the Dougal FFR allotment with 90 AUMs. As part of the permit, the number of livestock and season of use on the fenced federal range (FFR) allotment is at your discretion.

### South Dougal

The BLM would permit 102 cattle from 6/12 to 9/30 with 374 AUMs authorized. As part of this alternative, the permittee would continue to graze under the 1984 allotment management plan.

**Alternative 2** would authorize livestock grazing as applied for by Frankie Dougal.

### Dougal FFR

The BLM would permit 88 cattle from 12/1 to 12/31 with 90 AUMs and would also include a grazing system that would authorize livestock use within pastures 1-7 and 9 with number of livestock and season of use at the permittee's discretion. Pasture 8 would be grazed under a 2-year grazing system with a maximum of 45 days of use, with no more than 45 cattle.

### South Dougal

On the South Dougal allotment, 165 cattle from 6/8 to 9/30, and 374 AUMs would be authorized. As part of this alternative, a 3-year grazing system was proposed that would graze 187 cattle for 22 to 33 days, with use starting as early as June 2 and ending by August 15.

## **Alternative 3**

### Dougal FFR

The BLM would permit the number of livestock at your discretion from 3/1 to 2/28 (365 days) with a maximum level of use up to 90 AUMs for the Dougal FFR allotment. This alternative would also include a 3-year deferred-rotation grazing system with days of use varying from 30 to 365 days for this allotment.

### South Dougal

The BLM would permit 374 AUMs. As part of this alternative, a 3-year grazing system was developed that would graze 187 cattle for 28 to 32 days, with use starting as early as May 31 and ending by September 13. This alternative also included specific upland and riparian terms and conditions.

### **Alternative 4**

#### Dougal FFR

The BLM would permit grazing under a 3-year grazing system that calculates the percentage of public land forage in the allotment. This alternative would permit grazing from 3/1 to 2/28 at 14 percent public land, with a maximum level of use up to 90 AUMs. The alternative would authorize 5 to 200 cattle with 32 to 152 days of use.

### South Dougal

The BLM would permit 284 AUMs. As part of this alternative, a 3-year grazing system was developed that would graze 144 cattle for 28 to 32 days, with use starting as early as May 18 and ending by November 1, with one year of rest for pasture 2. The AUMS and number of cattle were reduced to provide for faster improvement and further long-term sustainability for riparian and sage-grouse resources.

### **Alternative 5**

This alternative would deny the applications for grazing permit renewal in whole and not authorize grazing for a period of 10 years for the South Dougal and Dougal FFR allotment. The permittee would retain her grazing preference on these allotments, to be reconsidered for use at the end of the 10-year period.

## **Final Decision**

After considering the current grazing practices, the current conditions of the natural resources, and the alternatives and analysis in the EA, as well as other information, it is my Final Decision to authorize grazing for a period of 10 years as outlined below:

South Dougal allotment would be authorized under Alternative 3 and the Dougal FFR allotment would be authorized under Alternative 1, as described in EA number DOI-BLM-ID-B030-2013-0022-EA. I will also allow trailing of livestock across the South Dougal allotment.

Implementation of these alternatives over the next 10 years will allow the South Dougal allotment to meet or make significant progress toward meeting the Idaho S&Gs while also moving toward achieving the resource objectives outlined in the ORMP. Livestock grazing associated with the implementation of Alternative 1 over the next 10 years will not result in any change to the Dougal FFR allotment's performance under the Idaho Standards and Guides or the ORMP.

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

**Table LVST-3:** Mandatory and other terms and conditions for the South Dougal and Dougal FFR allotments

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
South Dougal	107	Cattle	5/31	9/13	100	Active	373
Dougal FFR	7	Cattle	3/1	2/28	100	Active	88

Other 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 March 28, 2014. 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 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.
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 enclosures 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 in the Dougal FFR allotment.
13. The number of livestock and season of use on the Fenced in Federal Range (FFR) allotment Dougal FFR is at your discretion.
14. Utilization in pastures 1 and 2 of the South Dougal allotment may not exceed 40 percent utilization at the end of the active growing season in year 2 and year 3.
15. In pasture 1 and 2 of the South Dougal allotment stubble height of no less than 6 inches, woody browse use no greater than 30 percent incidence of use on most years' lead growth, and bank alteration no greater than 10 percent measured at the end of the growing season in key riparian areas when grazed during July 1 through September 30.
16. Livestock numbers would be coordinated between BLM and the permittee and may vary in accordance with annual grazing application as long as the permitted use period and active AUMs are not exceeded.

**Table LVST-4:** South Dougal allotment grazing schedule

Pasture	Year	Date On	Date Off	Days	# Cows	AUMs
Flat Iron (1)	1	7/16	8/16	32	187	197
South Dougal (2)		8/17	9/13	28	187	172
Flat Iron (1)	2	5/31	6/30	31	187	191
South Dougal (2)		7/1	7/29	29	187	178
Flat Iron (1)	3	7/1	7/30	30	187	184
South Dougal (2)		6/1	6/30	30	187	184

**Table LVST-5:** Dougal FFR allotment grazing schedule

Year	Pasture	Date On	Date Off	Days	Cattle Number
All years	1-9	3/1	2/28	365	At your discretion

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

Flexibility is provided as described in your permit Terms and Conditions. You will be offered a grazing permit(s) for a term of 10 years for South Dougal and Dougal FFR allotment.

**Table LVST-6:** Permitted grazing use

Allotment Name	Active Use	Suspension	Permitted Use
South Dougal	374 AUMs	253 AUMs	627 AUMs
Dougal FFR	90 AUMs	0 AUMs	90 AUMs

***Other Notes on the Final Decision***

Project maintenance obligations identified in current range improvement permits and cooperative agreements for range improvements are unchanged by this Final Decision. Implementation of this Final Decision is contingent upon maintenance of projects in a functioning condition (i.e., boundary and internal fences are in such good and functioning condition as to assure their ability to accomplish the purposes for which they were constructed, barriers to livestock movement).

**Rationale**

***Record of Performance***

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

## *Justification for the Final Decision*

Based on my review of EA number DOI-BLM-ID-B030-2013-0022-EA, the rangeland health assessment/evaluation, determination, and other documents in the grazing files, it is my Final Decision to select Alternative 3 for the South Dougal allotment and Alternative 1 for Dougal FFR. I am also allowing trailing across the South Dougal Allotment. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will best fulfill the BLM's obligation to manage the public lands under the Federal Land Policy and Management Act's multiple use and sustained yield mandate, and will result in the South Dougal and Dougal FFR allotment meeting or making significant progress toward meeting the resource objectives of the ORMP and the Idaho S&Gs.<sup>15</sup>

## *Issues Addressed*

Earlier in this decision I outlined the major issues that drove the analysis and decision making process for the South Dougal and Dougal FFR allotments. I want you to know that I considered the issues through the lens of each alternative before I made my decision. My selections of Alternative 3 for the South Dougal allotment and Alternative 1 Dougal FFR were in large part because of my understanding that these selections best addressed those issues, given the BLM's legal and land management obligations.

*Issue: Habitat conditions for greater sage-grouse (Centrocercus urophasianus; from this point on referred to as sage-grouse): Sage-grouse habitat health is directly related to upland vegetation and watershed*

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<sup>15</sup> Your allotment(s) are, as you know, members of one group of six groups of allotments forming the Owyhee 68 allotments, which are the subject of a permit renewal process that was completed by December 31, 2013. The NEPA process for the Owyhee 68 consists of five EAs and the EIS which supports this particular set of decisions. 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 member of a group of allotments located in a particular landscape, the BLM Owyhee Field Office. That is, I am looking not just at your individual allotment; reviewing its Rangeland Health Assessments, Evaluations, and Determinations; and selecting an alternative that will best address this allotment's ecological conditions and BLM's legal responsibilities (for the purposes of this decision). I am also looking at this allotment from a landscape perspective. Viewed this way, it is clear that 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.

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.

AND

*Issue: 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*

AND

*Issue: 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.*

### South Dougal

Alternative 3 is expected to maintain upland vegetation resources over the life of the permit and improve resources in the long term (greater than 10 years) because the health and vigor of upland herbaceous vegetation would benefit from deferment and fewer days of critical-growing-season use. The upland utilization limits of 40 percent would further ensure that the intensity of grazing use during the active growing season is reduced to an appropriate level during the 2 years of use during the critical growth period.

Under Alternative 3, soils would remain stable, although hydrologic function, energy flow, and nutrient cycling would remain slightly depressed over the short term, and could remain so over the long term to the extent that sagebrush does not recover. However the level of depressed hydrological function has not resulted in physical soil instabilities in the watershed.

Because sagebrush components of sage-grouse habitat are missing due to the sagebrush die off, the habitat was marginal to unsuitable for breeding. Alternative 3 would be expected to maintain habitat condition for nesting sage-grouse and ground nesting birds that are dependent on upland habitats in spring and early summer seasons the 40 percent utilization limit would ensure there is enough cover for sage-grouse.

Overall, implementation of Alternative 3 will result in maintaining resource conditions with some slight improvement over the long term for upland vegetation, soils and sage grouse resources. However, the primary limiting factor for upland wildlife species vegetation, soils and sage grouse habitat was an increase in juniper cover and a lack of sage-brush due to a die-off.

### Dougal FFR

Alternative 1 would be expected to maintain upland vegetation resources over the life of the permit because livestock grazing was not a causal factor for failing to meet the Standard; thus, it is expected that health and vigor of upland herbaceous vegetation would remain the same. Although the allotment would still not meet or make significant progress toward meeting Standard 4 because of limitations from causal factors (past livestock grazing that reduced large bunchgrasses, invasive plants) maintenance of upland vegetation conditions would be expected.

*Issue: Riparian vegetation conditions: Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.*

AND

*Issue: 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.*

#### South Dougal

Alternative 3 is expected to improve riparian vegetation conditions and habitat for wildlife due to the limitation to 2 out of 3 years of hot-season use, in addition to stubble height and woody browse use limits. These terms and conditions and the new grazing schedule will promote the regeneration and establishment of herbaceous and woody plants that function to dissipate energy of high flows, trap sediments, harden streambanks, provide shade to streams, deliver woody debris, and improve water quality. It is also expected that this alternative would increase the composition of hydric species and reduce the amount of woody browse use by livestock, thereby stimulating improvement in riparian vegetation.

Overall, I expect the riparian communities in the South Dougal allotment to progress steadily toward meeting desired habitat management objectives and meeting Standards 2, 3 and 8 with the implementation of Alternative 3.

#### Dougal FFR

Because riparian areas are not found in pastures 1-3, 5-7 and 9, no riparian wildlife effects are anticipated in these pastures.

Under Alternative 1, grazing in pastures 4 and 8 would result in the remote possibility of egg trampling in riparian areas during the breeding season for Columbia spotted frog. However, these potential negative effects to spotted frogs are not expected to occur since surveys have failed to find frogs in the allotment and public lands in the allotment are not within a spotted frog-occupied watershed.

*Issue: Special Status Plant Species: Livestock grazing is adversely affecting special status plants by altering surrounding upland vegetation, habitat and reproduction of individuals.*

#### South Dougal

Alternative 3 would allow the allotment to meet Standard 8 and the ORMP objective for special status plants in the short and long term (less than 10 years and greater than 10 years, respectively). The 3-year rotational grazing system would provide for more benefit than Alternatives 1 and 2 because during all but 2 weeks every 3 years, and thinleaf goldenhead would complete its lifecycle in the absence of livestock, aiding in better vigor and health of the population.

#### Dougal FFR

Within the Dougal FFR allotment, thinleaf goldenhead and Bach's calicoflower are known to occur only in pasture 4. Trampling effects on both species would be similar to past use, with spring use having potentially greater effects. However, effects on the occurrence as a whole is unlikely to be substantial because cows have better distribution during the cooler temperatures of the spring (rather than summer) and are not expected to congregate for long periods at reservoir/pond edges during the late spring/early summer use, limiting the amount of disturbance to the mudflat edge. Surviving plants would be expected to set sufficient seed to maintain their presence after cattle leave the allotment. For this reason, this alternative meets Standard 4 and the ORMP objective for special status species.

*Issue: Noxious and invasive weeds: Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.*

#### South Dougal

Alternative 3 would not cause the increase or spread of noxious weeds. Scotch thistle has been mapped in the South Dougal allotment and is treated on a regular basis. Other invasive (but not noxious) non-native plants present include bulbous bluegrass, which is often co-dominant with native bunchgrasses. The noxious weed Scotch thistle is not expected to increase in the short term because it would be kept in check with ongoing noxious weed treatment. Bulbous bluegrass would continue to dominate extensive areas throughout the allotment. The health and vigor of native herbaceous vegetation would be maintained or improved, thus providing competition against invasive species (juniper and bulbous bluegrass).

#### Dougal FFR

Alternative 1 would not increase the spread of noxious weeds. No noxious weeds have been mapped in the Dougal FFR allotment. Other invasive (but not noxious) non-native plants present include bulbous bluegrass, which is often co-dominant with native bunchgrasses. Bulbous bluegrass would continue to dominate areas throughout the allotment. Overall the health and vigor of native herbaceous vegetation would be maintained providing competition against invasive species like bulbous bluegrass.

*Issue: 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.*

AND

*Issue: Paleontological resources: Livestock grazing has the potential to cause breakage and displacement of fossils.*

#### South Dougal

The BLM visited two known sites within the allotment; neither site was affected by livestock grazing. For this reason implementation of Alternative 3 would not affect the sites.

#### Dougal FFR

One site is within the Dougal FFR allotment. No potential livestock congregation areas were identified. For this reason implementation of the alternative would not affect the sites.

*Issue: Livestock trailing: Trailing may adversely affect upland vegetation, soils, weeds and riparian vegetation.*

#### South Dougal

Effects from livestock trailing/crossing would include minor trampling and negligible utilization. Because trailing would occur along an existing road with ongoing motorized vehicle travel that may disperse weeds, any additional weed spread as a result of livestock trailing is expected to be negligible. It is not anticipated to effect riparian areas since no riparian areas are found along the trailing route.

#### Dougal FFR

Trailing of livestock is not occurring in the allotment.

*Issue: Socioeconomic impacts: Livestock grazing affects local and regional socioeconomic activities generated by livestock production.*

#### South Dougal and Dougal FFR

During the NEPA and public comment process, some raised the concern that selection of certain alternatives considered in the EA could impact regional socio-economic activity. I share this concern, and have taken these concerns into consideration in making my decision; however, my primary obligation is to ensure that the new grazing permit(s) protects resources in a manner consistent with the BLM's obligations under the Idaho S&Gs and the ORMP. As noted above, I have selected Alternative 3 for the South Dougal allotment and Alternative 1 for the Dougal FFR allotment, in large part because those selections accomplish those latter goals.

Over the long term, your grazing operation relies upon maintenance of the natural resources, including productive and healthy rangelands capable of supplying a reliable forage base. Selection of an alternative based 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 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 on allotments where current levels are compatible with meeting rangeland health standards and ORMP objectives and, where not compatible, have attempted to select alternatives designed to meet resource needs. In 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. I have proposed Alternative 3 for the South Dougal allotment, based on this rationale: the deferment of grazing will enable the allotment's riparian areas to make greater progress toward meeting standards, thereby benefitting shrub steppe and riparian species, and will reduce the existing upland vegetation vulnerabilities.

*Issue: Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire.*

#### South Dougal and Dougal FFR

During the NEPA process, some asked the BLM to consider using grazing to limit wildfire. The BLM has considered the issue and determined that it would be theoretically possible to use targeted grazing to create fuel breaks on these allotments with the hope that those fuel breaks would help control the spread of large wildfires in the area. However, the resource costs associated with this strategy are such that I have decided against it. Ultimately, implementation of Alternative 3 for the South Dougal and Alternative 1 for Dougal FFR allotment will not significantly alter the BLM's ability to fight wildfire in the area.

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

The selected alternatives retain a level of grazing use that reduces the accumulation of fine fuels, and thus will lessen the spread of large wildfires when fire weather conditions are less extreme. More importantly, 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.<sup>16</sup>

*Issue: 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 CO<sub>2</sub> 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.*

### South Dougal and Dougal FFR

Climate change is another factor I considered in building my decision. Climate change is a stressor that can reduce the long-term competitive advantage of native perennial plant species. Since livestock management practices can also stress sensitive perennial species in arid sagebrush steppe environments, I considered the issues together, albeit based on the limited information available on how they relate in actual range conditions. Although the factors that contribute to climate change are complex, long-term, and not fully understood, the opportunity to provide resistance and resilience within native perennial vegetation communities from livestock grazing induced impacts is within the scope of this decision. The selection of Alternative 3 and 1 will at minimum maintain and in long-term improve 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 and to progress toward meeting rangeland health; under this alternative, native plant health and vigor will be better able to provide resistance and resilience to additional stressors, including climate change.

### *Additional Rationale*

A tremendous amount of thought and challenge went into developing grazing management responsive to your allotment's specific resource needs, geography, and size. 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, resulting in various issues and priorities. All attempts to coordinate grazing throughout the entire allotment were made by me and my staff with you and the interested public, recognizing the difficulty of not only providing the mandated needs for the resources, but also the needs and capability that you, the permittee have. I believe I have balanced those needs of the resource and your capabilities with the information I have to the extent possible.

While I did consider selecting Alternative 5 (No Grazing) for these allotments, 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 allotments. In selecting Alternative 3 for the South Dougal allotment and Alternative 1 for the Dougal FFR allotment, rather than Alternative 5, I especially considered (1) BLM's ability to meet resource objectives using the selected alternative, (2) the impact of implementation of Alternative 5 on the your operations and on regional economic activity, and (3) your past performance under previous permits. The resource issues identified are primarily related to the improper seasons and site-specific intensities of grazing use. By implementing these alternatives, the resource issues identified will be addressed. Suspension of grazing for a 10-year period 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 Final 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 decision to implement Alternatives 3 and 1 is not a major federal action that will have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. That finding was based on the context and intensity of impacts organized around the ten significance criteria described at 40 CFR § 1508.27. Therefore, an environmental impact statement is not required. A copy of the FONSI for EA number DOI-BLM-ID-B030-2013-0022-EA is available on the web at:

[http://www.blm.gov/id/st/en/prog/grazing/owyhee\\_grazing\\_group/grazing\\_permit\\_renewal2.html](http://www.blm.gov/id/st/en/prog/grazing/owyhee_grazing_group/grazing_permit_renewal2.html)

### **Conclusion**

In conclusion, it is my decision to select Alternative 3 for the South Dougal allotment and Alternative 1 for the Dougal FFR allotment over other alternatives, because livestock management practices under these selections best meet the ORMP objectives allotment-wide and the Idaho S&Gs consistent with the projected ability of BLM to oversee grazing on these allotments over the next 10 years. Alternative 3 would implement livestock management practices on the South Dougal allotment that would allow for all standards to be met or significant progress to be made. For the Dougal FFR allotment, Alternative 1 would maintain the resource conditions within the allotment, conditions which are not affected by current livestock grazing management.

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 both allotments 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 South Dougal and Dougal FFR allotments as available for livestock grazing;
- 4130.2 Grazing permits or leases. Grazing permits may be issued to qualified applicants on lands designated as available for livestock grazing. Grazing permits shall be issued for a term of 10 years unless the authorized officer determines that a lesser term is in the best interest of sound management;

- 4130.3 Terms and conditions. Grazing permits must specify the term and conditions that are needed to achieve desired resource conditions, including both mandatory and other terms and conditions; and
- 4180 Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration. This Proposed Final Decision will result in taking appropriate action to modifying existing grazing management in order to make significant progress toward achieving rangeland health.

## Right of Appeal

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. 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:

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

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 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

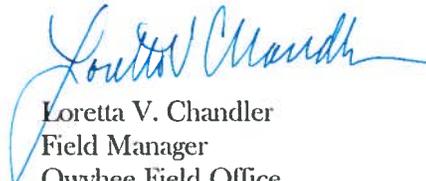
(4) Whether the public interest favors granting the stay.

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

National Research Council. (1994). *Rangeland Health: New Methods to Classify, Inventory, and Monitor Rangelands*. Washington D.C.: National Academy Press.

Copies sent to:

- See attached Final Decisions Mailing List

## Final Decision Mailing List

Company Name	First Name	Last Name	Address 1	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 <sup>th</sup> 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 <sup>th</sup> 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 <sup>th</sup> 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
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 <sup>th</sup> St.	Ames	IA	50010

Company Name	First Name	Last Name	Address 1	City	State	Zip
	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
	John	Richards	8933 State Hwy. 78	Marsing	ID	83639
Office of Species Conservation	Cally	Younger	304 N. 8 <sup>th</sup> St., Ste. 149	Boise	ID	83702
Corral Creek Grazing Assoc. LLC	Tim	Lequerica	PO Box 135	Arock	OR	97902
Lequerica & Sons Inc.			PO Box 113	Arock	OR	97902
	Craig & Rhonda	Brasher	4401 Edison	Marsing	ID	83639
	Frankie	Dougal	36693 Juniper Mtn. Rd.	Jordan Valley	OR	97910
	Thenon & Jana	Elordi	59010 Van Buren	Thermal	CA	92274
Larrusea Cattle Co.			PO Box 124	Arock	OR	97902
Morgan Properties	David	Rutan	PO Box 277	Jordan Valley	OR	97910
South Mountain Grazing Coop	Terry	Warn	PO Box 235	Jordan Valley	OR	97910
Wroten Land & Cattle Co.			30314 Juniper Mtn. Rd.	Jordan Valley	OR	97910
	Dale	Berrett	3540 Hwy. 95	Jordan Valley	OR	97910
	WF & Carolyn	Peton	PO Box 998	Veneta	OR	97487
	Phillip & Benjamin	Williams	1807 Danner Loop Rd.	Jordan Valley	OR	97910
	Thomas	Gluch	PO Box 257	Jordan Valley	ID	97910
	Mindy	Kershner	2904 Jones Road	Jordan Valley	ID	97910

**Protest Responses – South Mountain Group Non-Owyhee 68 Allotments**

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
23	<p>South Dougal and Dougal FFR - The State of Idaho protests that the Bureau of Land Management (BLM) did not allow the South Dougal and Dougal FFR permittee to use all parts of 43 CFR 4100 (specifically 43 CFR 4120.3-1(a) and 4180.2(c) during her grazing permit renewal process. In conversations with the permittee, the state was informed that early in the permit renewal process the permittee requested as part of her permit renewal process the following project work be considered: (1) juniper control project work be conducted and (2) improve and reconstruct a water pond spillway. The permittee was immediately informed that this would absolutely not happen as part of her permit renewal process. The State continues to remain concerned that BLM is not allowing some of the Owyhee 68 permittees the option to use the management tools of rangeland improvements [43 CFR 4120.3-1(a)] in order to move towards meeting Idaho Standards and Guidelines. (– Range Improvement Projects: JUOC &amp; water dev. reconstruction.)</p>	<p>The proposed projects are not consistent with the purpose and need for the NEPA analysis of permit renewal stated in the EA. That purpose and need is to renew permits in compliance with the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management, as well as the management objectives within the Owyhee Resource Management Plan using existing infrastructure. Rationale for not considering additional infrastructure is provided in the Alternatives Considered but not Analyzed section of the EA.</p>
24	<p>South Dougal and Dougal FFR - The State also protests BLM's failure to take a "hard look" as required by NEPA in their grazing permit renewals by not including and analyzing range improvements during their permit renewal process.</p>	<p>An alternative that would consider the installation of new range improvements was considered but not analyzed in detail. See the South Mountain Group EA section 2.3, pages 26-28.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
25	South Dougal and Dougal FFR - These allotments and the surrounding landscape is greatly threatened by exotic invasive species. We are alarmed that BLM continues to ignore necessary alternative actions provided to BLM in an alternative submitted by WWP (and where we requested to work with BLM) to restore degraded lands and seedings, and protect remnant native sagebrush habitats before they become overcome with exotic grasses and other weeds caused by livestock grazing. We Protest this failure.	The potential for weed infestation and site specific analysis of current conditions was analyzed in the EA at 3.2.1 for the South Mountain Group Allotments and then specifically by allotment at 3.3.
26	South Dougal and Dougal FFR - We Protest the continued use of the severely flawed NRCS Ecosite and other modeling the EA is based on.	This is a duplicate response virtually identical to those submitted for Group 1, 2, and 3, scoping comments and protests with no specific information on any one decision. See Protest Point 144
27	South Dougal and Dougal FFR - We Protest tiering to the Chipmunk EIS, which has greatly insufficient direct, indirect and cumulative effects analysis of complex issues.	The analysis within the group 2 EIS was considered in addition to the South Mountain Group 4 EA to inform the decision maker on the potential impacts of the proposed decision.
28	South Dougal and Dougal FFR - We protest BLM not explaining how state land grazing and AUMs are controlled, and dealt with in this process. If BLM cuts AUMs, will the state just let the rancher graze more on state lands that are not separate? The whole issue of stocking is highly uncertain, and it appears that these lands are overstocked.	The state land AUMS are determined by the Idaho Department of State Lands not by actions of the BLM. Because South Dougal has no state land this question is not relevant. Increasing state AUMS on state land within the Dougal FFR is not likely as no AUMS were reduced. Your opinion on overstocked lands is noted.
29	South Dougal and Dougal FFR - We Protest the lack of adequate and current bulbous bluegrass, exotic brome, cheatgrass, and medusahead mapping in this and all the other allotments to date.	EA analysis was completed using the best available data. See section 3.0 Affected Environment of the South Mountain Group EA for specific mapping.
30	South Dougal and Dougal FFR - We would like to request a meeting with BLM about this and the other pending Protested Decisions, and analysis of the alternative and mitigation actions that we submitted during scoping.	Not substantive, however, the request to meet has been passed on to the Owyhee Field Office Manager.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
135	This EA and the preceding lot of associated Proposed Decisions are greatly flawed. They fail to protect the dying-out sage-grouse and pygmy rabbit populations, and redband trout and other rare aquatic biota, including federal candidate Columbia spotted frog.	Grazing management was altered to reduce impacts to special status wildlife species and their habitats. The expected effects are analyzed within the EA based on the current conditions found in the RHA.
136	They also greatly fail to protect lands and habitats from serious weed infestations, spread and ultimate dominance with continued abusive cattle grazing practices.	See Protest Point 25
138	We Protest the failure to fully assess the footprint of the permittees and related grazing activities across the Idaho-Oregon region public and state lands. What other allotments in Owyhee FO and Vale BLM District or elsewhere do these entities graze in? What is the current ecological condition? What invasive species are present that may be transported onto cattle-disturbed lands in this allotment? What is the record of compliance? What is the stocking rate? Actual use? What FRH assessments have been conducted? Will use be shifted, altered or intensified elsewhere onto, through, or across public lands as a result of the changes made in relation to the Owyhee 68 permit decisions in any and/or all allotments where these permittees also graze? What weeds are present that may be transported onto these lands in the other lands grazed, or through which livestock are moved?	This protest point is not specific to any one allotment or decision and is identical to the protest point submitted for Group 3. The BLM does not conduct background checks on the applicants for grazing permits other than to examine his/her record as a grazing permit holder. We determine if the applicant has a satisfactory record of performance and is a qualified applicant for the purposes of a permit renewal. In this case, the BLM has determined that the applicant has met these requirements and is a qualified applicant. It would be inappropriate for the BLM to speculate what the "footprint" of the Company may be or what decisions the permit holder may make in his/her ranching operation that result from the grazing systems put in place on public land by the agency when renewing a grazing permit.
139A	What, in essence, is the full grazing, trailing and herding footprint of all the operation? Does sub leasing occur on any or all allotments? What grazing associations have been grazed by livestock that nm this brand, or are controlled by the ranchers using this permit? What Priority and general sage-grouse habitats are affected? Where? When are they being grazed? What redband trout habitats are being impacted? What other sensitive species habitats?	The Pertinent information is provided in the RHAs and the South Mountain Group EA section 2.4, and 3.3 for each allotment.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
139B	<p>Did any of these allotments have AUMs altered by BLM under the Bush Grazing Regulations (which never went into effect)? Have you reviewed all the OFO permits and permit transfers to determine if AUM categories were changed or other changes made to benefit ranchers? How about during permit transfers? If so... where did this occur, and who were the permittees? What resources have been impacted? We Protest the lack of information on this. What do the past 3 grazing permits show for AUMs - in all allotments?</p>	<p>This information is not necessary to make an informed decision regarding permit renewal for a specific allotment and much of it is outside of the scope of the permit renewal process.</p>
140	<p>We Protest BLM preparing a Final EA and FONSI, yet splitting off and segmenting the issuance of all the Final Decisions. See OFO Manager cover letters for those groups - with the controversial lumping of several allotments in the Red Mountain/Quicksilver area where ranchers have long sought many concessions from BLM in Toy delayed, along with the Feltwell allotment in Morgan Group, and Dougal in South Mountain.</p> <p>What is the reason for this? This adds to the confusion, and difficulty of an integrated and timely appeals resolution of the grazing morass in the Owyhee 68 Groups. It is clear from our review of this and the other Group EAs that BLM needed to prepare an EIS, and needed large-scale updated animal and plant inventories that it has failed to conduct</p>	<p>This protest point is not specific to any one allotment or decision and is identical to the protest point submitted for Group 3. Some of the allotments that have been analyzed in this NEPA document (South Mountain Group) are not subject to the stipulated settlement agreement which requires the BLM to fully process the "Owyhee 68" permits before December 31, 2013. Because the court imposed deadline does not apply to all of the allotments, the decision was made to complete the permits applying to the allotments that are on the year-end deadline first, and defer the others until the new year. However, this does not alter the CEQ guidance under the NEPA (1508.25 (3)): "Similar actions, which when viewed with other reasonably foreseeable or proposed agency actions, have similarities that provide a basis for evaluating their environmental consequences together, such as common timing or geography. An agency may wish to analyze these actions in the same impact statement. It should do so when the best way to assess adequately the combined impacts of similar actions or reasonable alternatives to such actions is to treat them in a single impact statement." It is appropriate to analyze these multiple actions in one NEPA document while issuing separate decisions by allotment, by permit. BLM used the best available information to evaluate the animal and plant species of the Group 3 allotments.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
141	It is clear from our review of this and the other Group EAs that BLM needed to prepare an EIS, and needed large-scale updated animal and plant inventories that it has failed to conduct. We doubt the delay is for crucial information like this. Is it because ranchers want you to reverse EA findings in some way? Are you delaying permits where some cuts were being proposed? If so, why? Have politicians been involved in this delay? We Protest the lack of explanation.	This protest point is not specific to any one allotment or decision and is identical to the protest point submitted for Group 3. This Protest Point infers that only an EIS meets the NEPA's hard look requirement for unbiased analysis when the hard look standard also applies to EA-level analysis. BLM has taken the required Hard Look and the environmental impacts of the proposed decision and multiple alternatives based on the best available science.
142	We Protest BLM tiering to the Cow, Jump, Succor EIS. The analysis of direct, indirect and cumulative effects in that EIS is greatly inadequate, and suffers from many of the same blindness and flaws as this EA does. It is often largely programmatic, and it fails to conduct necessary baseline inventories for sensitive species occurrence and habitat quality and quantity, and to then use a broad range of measures to conserve, enhance and restore habitats and populations of GRS (greater sage-grouse) and other sensitive species. It relies on a very limited and faulty analysis of historical vs. current grazing impacts	The analysis within the Group 2 EIS was considered in addition to the South Mountain Group 4 EA to inform the decision maker on the potential impacts of the proposed decision.
143	We are concerned that BLM tries to reduce and minimize looking for adverse environmental conditions, and examines only a few limited areas. BLM also ignores a hard look at critical habitat components and threats. BLM must carefully and systematically examine the full battery and magnitude of threats, including habitat loss, degradation and fragmentation, in these allotments, and surrounding state, private and BLM lands. BLM must then develop a new and expanded range of alternatives. We Protest the failure to do so.	The assessment of the current habitat conditions for each allotment was analyzed in the Rangeland Health Assessments and the environmental impacts of the current management as well as multiple other grazing and non-grazing alternatives contained in the South Mountain Group EA.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
144	<p>The EA analyses are plagued by BLM reliance on the severely flawed unvetted NRCS Ecosites, which are models that use inaccurate information on sagebrush and western juniper fire return and disturbance intervals (see Knick and Connelly 2009/2011, USFWS WBP Finding for GRSG sagebrush habitats, in contrast. They falsely claim that sage is "decadent" and that no western juniper communities should exist--- anywhere in this landscape. We Protest the use of these flawed models and the inconect inputs, FRCC&lt; disturbance intervals, state and transition, and other models upon which they rely. They ignore the historical record, as shown in the BLM General Land Office survey records for less disturbed areas of the Owyhee region. See WWP summary.</p> <p>BLM has consistently refused to change course at all once it relied upon the severely flawed info in Pole Creek. BLM has blindly refused to consider a broad body of other science and new information, including historical information from its own General Land Office Records. Instead, it buries its head in the sand relying on the modeled Ecosites developed by ranching consultants for the benefit of ranchers that are now being put as Gospel by NRCS. How has BLM vetted all the NRCS Ecosites used in all the 68 permit processes? We Protest the failure to fully examine and critique the flawed myths and claims the Ecosite models rely upon.</p>	<p>This is a duplicate response virtually identical to those submitted for Group 1, 2, and 3, scoping comments and protests with no specific information on any one decision. The suggestion that current distribution and density of western juniper in the South Mountain Group Allotments is inconsistent with site potential among the NRCS ecological site description is not supported by current science and professional understanding of the role of western juniper within vegetation communities of the Owyhee Uplands. Ecological site descriptions do not include a site description for a juniper site inventoried within the South Mountain Allotments, although absence of a site guide does not mean that it is not a native species present in the landscape at site potential. Western juniper is represent at site potential in limited inclusions of described sites where shallow soils and rocky outcrops limit the spread of fire. Current science was used in the EA to describe the vegetation affected environment section and other related sections, including identification of the role of western juniper within the landscape and analysis of cumulative effects.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
145	<p>When and to what degree has there been political involvement in the Owyhee processes? We Protest the lack of information and explanation of the backward steps BLM is now taking.</p> <p>An EIS is clearly required to take a hard and unbiased look at the critical habitat needs of sage grouse and other sensitive species, and livestock grazing impacts on these habitats and populations associated with the Group, in this ID-OR landscape where the same grazing operations are impacting habitats across the area. We recognize several permit holder names in Group as appearing in the Chipmunk permits we just Protested</p>	<p>This Protest Point infers that only an EIS meets the NEPA's hard look requirement for unbiased analysis when the hard look standard also applies to EA-level analysis. BLM has taken a hard look at the sage-grouse habitat needs in the area. In fact, the cumulative effects analysis bounding for effects analysis in the Group 3 EA considers the same geographic extent as the Group 2 EIS. Both of these NEPA documents consider the sage-grouse subpopulation area of northern Nevada, eastern Oregon, and southwestern Idaho.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
146	<p>BLM failed to conduct necessary current site-specific riparian and aquatic species habitat and population studies to understand critical habitat conditions and components. and determine the severity and magnitude of the effects of its limited series of alternative actions on the persistence of the habitat and persistence and viability of populations. BLM never asked: How bad are conditions- and c&lt;m the redband trout, Columbia spotted frog, California floater, or other aquatic species populations tolerate any continued grazing disturbance without suffering long term, or irreversible harms? BLM used Alternative artifices and various "Constraints" to write off and ignore riparian areas based on artificial fence configurations, intermittent conditions (which are actually being caused by livestock), various old or flawed vegetation databases and models, etc. It also failed to ever collect data on hillslope conditions, gullyng, etc. in making its watershed FRH Determination-relying on a few sites on flat upland areas instead. It failed to adequately assess the severe degradation of uplands in the area of degraded streams, and the very high utilization levels, increasing weeds that have shallow roots and readily erode in runoff events, being completely ineffective in protecting soils - especially on slopes and banks above streams - from erosion and loss, and sedimentation. We Protest this.</p>	<p>This protest point is not specific to any one allotment or decision and is virtually identical to the protest points and scoping comments submitted for Groups 1, 2, and 3. Site specific habitat analysis is located in the Rangeland Health Assessments for each allotment. The analysis of the potential impacts for each alternative is located in the South Mountain Group EA chapter 3.</p>
147	<p>BLM must provide at least some ball park analysis of the adverse impacts and degraded conditions on non-federal lands, and a hard look at what is occurring on its own lands in ID-OR including the intermingled and neighboring allotments and other areas in watersheds. This includes the North Fork Owyhee Juniper Mountain watershed and habitat degradation that is occurring. We Protest the lack of a hard look at all direct, indirect and cumulative adverse effects.</p>	<p>Cumulative effects analysis and the rationale for the cumulative effects area is in Section 3.4 of the South Mountain Group 4 EA.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
148	We Protest BLM's Proposed Decision taking big steps backwards- and likely buckling under to rancher pressure in South Mountain and elsewhere in the Owyhee 68 Groups.	BLM analyzed a full range of alternatives including two reduced grazing alternatives and a no grazing alternative. Additionally the alternative selected, based on the analysis in the South Mountain Group EA, would make progress towards meeting the Standards for Rangeland Health and the RMP objectives. This clearly shows that BLM is taking steps towards improving rangeland health on these allotments.
149	The full adverse direct indirect and cumulative effects of the BOSH projects on spread and infestation of exotic species. altered fire cycles through promoting exotic invasive species, are not addressed in the EA	The Boise Sage-grouse Habitat Project (BOSH) began scoping in January of 2014. During the NEPA process for the South Mountain Group EA there were no existing proposals, commitment of resources, or commencement of the NEPA process; therefore, this project does not fall under a reasonably foreseeable action and was not included in the Cumulative Effects Analysis.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
150	<p>It is also clear that all the new state and private land projects that BLM is de facto aiding and allowing to affect BLM lands grazing have a federal nexus. So does the entire grazing scheme that is inter-twined with BLM lands- both in these and other Group allotments, the FFRs, and other Owyhee 68 allotments - such as Chipmunk allotments grazed by many of these same entities. Thus, necessary detailed site-specific direct, indirect and cumulative effects analysis must be conducted. How will this add to the burden of existing harmful livestock facilities across these allotments? Across sensitive species habitats and watersheds? What are conditions at all the 9 or 10 state lands springs that would be gutted for livestock waters? How will this impact Columbia spotted frogs? Redband trout headwater drainages? Water quality? Will standards be stripped after Alt. 2 is implemented as well? If so -this will result in both MORE AUMs and NO riparian standards? We Protest all of this -as BLM is buckling yet again to the Owyhee livestock industry. We Protest the EA NEPA analysis defects and Manager Chandler jeopardizing public lands, waters and biota. How will BLM control the number of AUMs actually imposed on its lands, and prevent double or triple the number of cows and AUMs actually being grazed? Or is that a feature built into the system, and not a bug?</p>	<p>Potential Impacts to these resources were analyzed in the South Mountain Group 4 EA.</p>
151	<p>BLM appears to be handing over a significant part of the administration of BLM lands to permittees under Alt 2, (and we strongly object to BLM relying on permittee monitoring that will exclude the Interested Public, in violation of the Grazing regulations). BLM is unlawfully conceding to exclusion of the Interested Public from processes involving the South Mountain and potentially other allotments. We Protest this.</p>	<p>BLM analyzed a range of alternatives that included Alternative 2. The impacts from each of these alternatives were analyzed in the South Mountain Group 4 EA.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
152	We Protest the failure to examine all aspects of this Proposed SM and other Decisions, including cumulative effects, in this light, as well as the failing of BLM to fully and fairly assess the serious potential or foreseeable harms to sage-grouse and sagebrush landscapes from both its own Alternative in the GRSG DEIS. How harmful would be potential adoption of some or all of the state's extremely harmful actions.	Cumulative effects analysis and the rationale for the cumulative effects area is in Section 3.4 of the South Mountain Group EA.
153	Riparian vegetation conditions: Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.  There are profound deficiencies in BLM's riparian baseline data, alternatives development, and analysis. Old, cherry-picked, limited, minimal baseline information is provided. BLM turns a blind eye to passive restoration and the full range of WWP's alternative suggestions.	BLM relied on the best available data to evaluate the current conditions on each allotment. This data and the analysis of site specific conditions can be found in the allotment specific RHAs.
154	. We Protest the failure of BLM to collect necessary current information, and the failure to manage the damaged and very important riparian areas for the public- rather than a group of ranchers that BLM allows to take over control of the public lands in Alt. 2 and also to impose harmful lax grazing of Alternatives 3 and 4, such as no protections at all for seeps, springs, streams.	BLM relied on the best available data to evaluate the current conditions on each allotment. This data and the analysis of site specific conditions can be found in the allotment specific RHAs. The analysis of effects for each alternative can be found in the South Mountain Group EA.
155	We Protest BLM's minimal consideration of the adverse effects of its grazing scheme, on amplifying and worsening the adverse effects of climate change. See Beschta et al. 2012.	Climate Change and its interactions with grazing were addressed in the South Mountain Group EA at sections 3.2 and 3.4

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
156	We Protest the failure of BLM to conduct the necessary on-the-ground site-specific assessment and inventories for rare plants and other sensitive species across the South Mountain Group, and all the 68 permit allotments. This failure is made worse by BLM continuing to allow large numbers of livestock, often in significant excess of the number that have actually been able to be grazed in the past, and/or BLM failing to require mandatory measurable use standards to ensure protection of habitats.	BLM used the best available data to assess current conditions on each allotment and analyze potential impacts from each alternative. Complete and comprehensive inventories are rarely available or feasible to conduct on such a large scale and so some extrapolation is necessary.
157	BLM has also failed to assess potential juniper treatment/killing projects that have occurred or may be likely to occur all across this region of the Owyhee FO and how this will harm elk, mule deer, northern goshawk, flammulated owl, ferruginous hawk, migratory birds, water quality, recreation, and promote flammable invasive weeds and species like bulbous bluegrass that provide minimal and poor forage. This further elevates weed risks.	Juniper removal was not part of any alternative within the South Mountain Group EA. The effects of juniper encroachment are discussed by resource (where applicable) in Chapter 3.
158	We Protest the failure of BLM to apply sound integrated weed management protections and management as a Term and Condition of the grazing permits, and its failure to take a hard look at a range of alternatives that address this pressing need in a bi-state landscape being choked with medusahead due to these same permittee cattle herd impacts. There is no current ESI or other study to understand how depleted the EA lands and other 68 permit allotments really are. There is a large-scale lack of sustainable perennial forage.	As states in 3.1.1 and 3.2.1 of the South Mountain Group EA BLM works closely with multiple agencies to manage and control weeds on both private and public land. The potential for livestock to facilitate the spread of weed is discussed in section 3.2.1 of the EA.
159	BLM greatly fails to provide a proper weed baseline, and to conduct risk analyses of lands and watersheds vulnerable to weed expansion or domination with continued grazing.	Site specific habitat analysis is located in the Rangeland Health Assessments for each allotment. The analysis of the potential impacts for each alternative is located in the South Mountain Group EA chapter 3.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
160	We Protest the lack of full analysis of how degraded and fragmented this landscape really is, and the threat it poses to lands, waters and species.	An assessment of current conditions on each allotment can be found in the respective RHAs.
161	Idaho BLM has greatly failed to asses the full adverse cumulative effects on habitats, populations, recreational uses, fire cycles, etc. of these treatments and seedings. This especially includes adverse effects on sage-grouse, pygmy rabbit, migratory birds and other sensitive species of these massive treatments.	Cumulative effects analysis and the rationale for the cumulative effects area is in Section 3.4 of the South Mountain Group EA.
162	We Protest these grave shortcomings, and also failure to adequately evaluate the impacts of all the grazing and trailing across ID and portions of OR lands that these loose and uncertain Decisions lacking necessary controls on livestock spreading weeds, and often lacking even any modern day use standards will result in.	Your opinion is noted. The effects of grazing and trailing on the South Mountain Group Allotments are analyzed in the EA and incorporated by reference the trailing EA from the Owyhee Field Office.
163	<p>Livestock trailing: Livestock trailing may adversely (fleet upland vegetation, soils, weeds, and riparian vegetation.</p> <p>Please tell us in careful site-specific detail where, when, and to what degree this is occurring, with each and every permittee, lessee, sub-lessee, etc. Please describe the magnitude of impacts during times with saturated soils, and times when soils are bone dry, Please tell us when where and how livestock are trailed through medusahead infestations or other weeds, and moved into pastures or allotments that do not yet contain these weeds. Please tell us why these ranchers cannot simply truck livestock. Reasonably good roads run through or close to these allotments. What is the full trailing footprint of these permittees across Idaho and Oregon lands? Why has BLM not considered a range of alternative actions and mitigations -such as integrated weed management,</p>	Analysis of trailing impacts was incorporated by reference from the Owyhee Field Office Trailing EA.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
	<p>requiring livestock be hauled/trucked around infestations vs. run right through the medusahead along the main Mud Flat road? Or run through medusahead that has taken hold in the most cattle-degraded sites or in various old "treatment" or burn sites? Why has BLM not developed a full and fair range of alternatives that would minimize weeds and disturbance, and apply integrated weed management in order to protect these greatly threatened watersheds, wildlife habitats and populations and aquatic species habitats and populations? We Protest the failure to provide full and detailed analysis including between 68 permit allotments and allotment groups, and other lands including areas like the West Little Owyhee and other watersheds and crucial sage-grouse and pygmy rabbit habitats in Oregon. Now the massive BOSH and other aggressive scorched earth juniper eradication schemes will promote further impairment and weed infestation and spread.</p>	
164	<p>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 for listing in the National Register of Historic Places.</p> <p>Yet BLM fails to conduct the necessary site-specific inventory, analysis, or even a cursory on the ground current look at the magnitude of damage being caused by grazing and trampling impacts on cultural sites and other important resources, and the erosional processes that are occurring across these lands and watersheds with their weedy, unraveling drainage networks that often abound in cultural materials.</p>	<p>Sites within a 50 meter radius of an identified livestock congregation area were monitored for grazing impacts. Sample surveys of congregation areas not previously surveyed were conducted. 92% of the identified areas received coverage.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
165	We Protest the failure to conduct necessary site-specific surveys and take a hard look at how facilities, supplement, herding practices, stocking rates, degree of existing erosion and cultural site damage that the current grazing will be imposed on top of all will adversely impact cultural sites. This includes the lands in the federal nexus of any allotments like With the state land that is targeted for new and expanded harmful livestock facility developments, or grazed in an uncertain manner.	Of 26 identified livestock congregation areas 24 received on the ground surveys for cultural resources. Additionally, 2 cultural sites were monitored for livestock impacts and 3 new sites were recorded. Consultation is done with both the State Historic Preservation Office and the Shoshone-Piute Tribes of the Duck Valley Indian Reservation.
166	We stress that BLM failed to provide any protective upland or riparian trampling standard at all, and applies very high levels of upland utilization. Thus, there is nothing provided in the EA and Proposed Actions (or the many actions that have already been finalized) to protect cultural sites and materials from livestock. Now, with the large-scale potential use of giant mastication machinery across the landscape, these adverse effects of livestock grazing will be amplified by the very significant crosscountry travel, soil displacement, erosion, and other effects of deforestation across the 1.5 million acre BOSH project area.	Mitigation measures are determined on a site specific basis. Mitigation measures are taken if a site is impacted by livestock or other means and it is determined that protection or other actions are required to preserve its eligibility characteristics.
167	Paleontological resources: Livestock grazing has the potential to cause breakage and displacement of fossils. Concerns with paleontological sites are similar to cultural concerns.	There are no recorded paleontological sites within the allotments group due to the complete absence of any fossil-bearing sediments, as noted in the EA.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
168	Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire. Exotic flammable weeds caused by grazing and trampling degradation are indeed overrunning this landscape, and grazing is a significant cause including through degradation of microbiotic crusts and soils- as a lot of this country has not been burned. We Protest the failure of BLM to adequately assess this in the SM and other 68 permit EAs. See Connelly et al. 2004, Knick and Connelly 2009/2011, IJSFWS GRSG WBP Finding, Manier et al. 2013, USFWS COT Report 2013.	The BLM issue statement acknowledges that livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds. In the South Mountain Group EA, the analysis of weeds was carefully considered and found that the selected alternative would allow native perennial species health and vigor to be maintained or improved.
169	We are concerned that BLM continues to obsess over "socioeconomic impacts", while ignoring the full battery of adverse impacts to all the rest of the "economic" values of the public lands from clean water to birdwatching. Moreover, in describing the exaggerated values of the grazing here, BLM must examine the full ecological degradation cost of the complete footprint of all of these livestock operations affected here.	The Final EA section 3.1.7 discusses the non-market values of ranching, including ecosystem services provided by rangelands and the impacts to those services caused by management that degrades the soils and vegetation on the allotments. In addition, section 3.2.7 discusses the impacts from removing grazing from any or all of the allotments for a period of 10 years; these impacts include improved recreational opportunities.
170	But unfortunately, BLM has conducted no systematic Ecological Site Inventory, carrying capacity, production, capability and suitability analysis or other stocking rate study to determine what level of stocking, if any, is sustainable. BLM's stocking rates are not supported by site-specific information on the capacity of the land to support the cattle grazing load.	The BLM used the ecological site information within the allotments in group 4 to determine the production on the allotment. This information was then used in combination with the resource constraints, rangeland health assessment to develop an appropriate grazing system to support livestock use.
171	BLM greatly fails to address water quality and quantity.	Water Quality is addressed in the RHAs for each allotment and within the South Mountain Group EA in sections 3.1.3 and 3.2.3 and specifically by allotment in section 3.3.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
172	BLM ignores that these lands impact and impair natural values and other values of the adjacent Wilderness and downstream WSR. We Protest the lack of all of this critical information.	Impacts to resources outside of the South Mountain Group Allotments but within the cumulative effects analysis area were considered in section 3.4 of the South Mountain Group EA.
173	With climate change, BLM fails to take a hard look based on site-specific degradation here, across the landscape, and across the 68 permit allotments, of how continued grazing will amplify and worsen impacts of desertification from past and current livestock grazing and all adverse impacts of chronic and continuing livestock grazing harms to soils, vegetation, waters, watersheds, water quality, water quantity, microbiotic crusts, sensitive species, important species like big game, terrestrial and aquatic species habitat quality, quantity connectivity (vs. fragmentation) , native vegetation communities including rare plants, and risk of invasive species proliferation, spread, dominance. Sec Beschta et al. 2012, for example. USFWS Warranted But Precluded Finding for GSG	Site specific conditions were assessed in the Rangeland Health Assessments for each allotment and the analysis of the multiple alternatives is in the South Mountain Group EA. Climate change effects were also considered.
174	. There are a vast battery of adverse impacts of these facilities and developments- ranging from increasing chances of West Nile virus to increasing mesopredators, to serving as epicenters for new infestation and expansion of harmful invasive exotic species. We Protest the failure of the EA and PDs to adequately address these concerns and develop a reasonable range of alternatives to address them.	Current allotment conditions and the potential effects from the range of alternatives were analyzed in the South Mountain Group EA. BLM did consider a full range of alternatives from increased grazing, reduced grazing, further reduced grazing and no grazing.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
175	<p>Many other important and pressing issues are ignored - from the degree to which livestock grazing in spring time promotes GRSG and migratory songbird predator subsidies and expansion of nest and egg and mesopredators across the landscape -to stock ponds promoting West Nile virus mosquito habitat. The full adverse footprint of grazing disturbance in this landscape is not addressed. See Knick and Connelly 2009/2011, USFWS WBP Finding fcH GRSG 2010, Manier et al. 2013.</p>	<p>These issues are addressed in section 3.2.5 of the South Mountain Group EA.</p>
176	<p>We Protest all of the following:</p> <p>BLM relied on minimal, cherry-picked upland sites on flat terrain in primarily better conditions areas for soils and watersheds assessments. It never examined or took a hard look at conditions of slopes, drainage bottoms, areas of highly erodible soils, gulying, hillslope erosion, and zones of compaction that had any relevance to actual detection of significant watershed problems, and resultant protection of watersheds. BLM never examined how harmful spring cattle use compacts soils, and the great deficiencies of its minimal and highly deficient range readiness scheme that allows cows to be turned out on top of wet soils during periods when more spring rainfall is certain to saturate soils, or other periods of damaging use.</p>	<p>BLM relied on technical references 1734-3, 1734--4 and 1734-6 to choose data collection sites. Site specific analysis of current conditions can be found in the RHAs for each allotment and in the South Mountain Group EA.</p>
177	<p>BLM's EA lists some- but certainly not all -relevant RMP components and requirements. Many key RMP provisions are absent. This is especially the case with required mandatory measurable use standards for bank trampling, stubble height and other riparian uses. This includes 10% bank trampling, retaining 6 inch riparian stubble height and other vital protective measures for fisheries, forestry, sensitive species and other values.</p>	<p>Not all RMP objectives are applicable to every project and the applicable objectives and RMP requirements are stated in section 1.7 of the South Mountain Group EA. The Referred to mandatory measurable use standards are interim standards to be in place until an approved grazing plan is implemented (see page 24 of the Owyhee RMP).</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
178	BLM fails to provide necessary site-specific baseline information and analysis to satisfy compliance with these provisions of the RMP in SM and the other 68 permit allotments. We Protest this. There is a lack of adequate site-specific analysis of adverse impacts of range projects; lack of site-specific mapping of medusahead, bulbous bluegrass, cheatgrass and other serious invasive species concerns; lack of necessary capability, suitability, stocking rate, productivity, carrying capacity and other studies so that it can determine what level of livestock use is actually sustainable; lack of consideration of the Vale Project destruction and grazing devastated Oregon lands, etc. We Protest this.	Site specific analysis of current site conditions occurred in the RHA for each allotment. Impacts and cumulative effects from current management as well as the other alternatives were analyzed in the South Mountain Group EA.
179	The lack of necessary site-specific information is made much worse by the lack of vital baseline survey and habitat quality and quantity info on sage-grouse, pygmy rabbit, sage sparrow, Brewer's sparrow, loggerhead shrike, ferruginous hawk, and on stream segments that still have perennial flows and that are still actually occupied by redband trout, western toad, Columbia spotted frog, etc. Also -in order to understand sustainable use BLM must examine the rate at which losses are occurring, the trajectory of the losses, the risks of site domination by exotic annuals grasses and/or bulbous bluegrass with continued grazing disturbance imposed. This is crucial in showing how flawed BLM's claims are that it can essentially ignore the damage from so-called historical grazing and let all manner of use continue. We Protest all of these deficiencies.	BLM used the best available information to evaluate the condition of wildlife habitat within the allotments. The site specific information can be found within the RHA for each allotment and the South Mountain Group EA.
180	It is also necessary to develop a suitable range of alternatives, and mitigation actions related to grazing damage under the Decisions. We Protest the failure to do so.	BLM considered an adequate range of alternatives in detail as well as several other alternatives that were considered but not analyzed in detail.

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
181	<p>In order to understand "sustainability" and context and intensity of the cattle grazing, trampling and other disturbance impacts, BLM needs to examine: Are the streams down to the last 1/4 mile of perennial flow in a drainage that formerly had large floodplains and evidence of well developed wetland soils over 5 miles of its length? Is there only a trickle of water left at a "developed" spring - yet a livestock water pipeline and development flows water leaking into mud holes around troughs? For example with riparian systems where is the former floodplain for all intermittent, ephemeral and perennial drainages? how does the current system and flow compare? What areas used to have beaver dams (we have often observed that old aspen chews remain in some sites showing relatively recent large-scale losses in riparian habitat conditions).</p> <p>Didn't the ICBEMP assessment determine that at least 90% of riparian areas had been lost in the Interior Columbia Basin? Is this loss potentially even greater here? Especially in the case of the gullied eroding drainages? To what degree have water developments inundated and fragmented riparian habitats? To what degree have existing projects and stocking levels in degraded allotment state, private or federal lands, sensitive species habitats, and watershed processes? Or impaired water quality? We Protest the lack of crucial information, analysis, and mitigation actions of the Owyhee FO here. See Sada et al. 2001, Belnap et al 2001, Belsky and Uselman 1998, Ohmart 1996, etc. How much of the riparian habitat has been lost? How little is left? We Protest the lack of analysis of these concerns.</p>	<p>Current conditions within riparian areas are described in the RHA for each allotment and the impacts of the various alternatives on riparian habitats were considered in the South Mountain Group EA.</p>

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
182	And how much worse will climate change make all of this? We Protest the EA's lack of a full and fair hard look, and lack of necessary controls on livestock, and removal of livestock from at risk areas to conserve, enhance and restore them.	Climate Change and its interactions with grazing were addressed in the South Mountain Group EA at sections 3.2 and 3.4. BLM considered an adequate range of alternatives in detail as well as several other alternatives that were considered but not analyzed in detail.
183	This is made even worse by BLM range cons deferring to ranchers using upland monitoring sites distant from any significant degree of livestock impacts- so 50% or 40% utilization is almost never measured.	Upland monitoring sites are selected following the guidance of BLM Technical References 1730-3 and 1730-4.
184	Meanwhile, large areas near sensitive streams and springs, or other sites, receive 80-90% utilization.	Riparian areas are evaluated under standards 2, and 3.
185	WWP's alternative submission specifically requested that BLM consider an alternative that would remove livestock from areas to prevent weed expansion. We know Owyhee BLM under the scrutiny of Idaho politicians would be unlikely to remove livestock from an entire allotment of any size, but BLM must consider removing livestock from very important habitats that have not yet succumbed to trampling and grazing caused weeds.	WWP submitted alternatives for consideration which appear in the South Mountain Group EA under Alternative 5 - no grazing alternative, and, alternatives considered but not analyzed in detail.
186	We stress that BLM largely ignored including significant periods of rest in its grazing schemes and only occasionally may apply a year here or there- despite the clear need to heal and protect native vegetation communities so they can resist cheatgrass invasion.	Considered under the no grazing alternative
187	In some of these EAs/EISs, Owyhee BLM has claimed that passive restoration just cannot be considered in a grazing permit process. This is false. We Protest this.	Considered under the no grazing alternative

<b>Protest Point No.</b>	<b>Protest Text</b>	<b>Protest Response</b>
188	We Protest the BLM relying on woefully deficient minimal and outdated 50% upland utilization, and the failure to provide adequate rest (including to jump start recovery), and continued harmful and failed grazing schemes that have resulted in the weeds and depletion in this landscape at present.	50 % utilization is the maximum allowable use level identified in the Owyhee RMP. However use levels are expected to be below that level under the selected alternative.



## Appendix L

This appendix hereby incorporates by reference the below language in its entirety into the DOI-BLM-ID-B030-2013-0022-EA Final Environmental Assessment (EA).

During public scoping and comment periods for the South 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 25 allotments (known as the Chipmunk Group) 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 sage-grouse habitat (Connelly, Knick, Schroeder, & Stiver, 2004).

The BLM subsequently prepared one EA each for the Toy Mountain, South Mountain, and Morgan groups of allotments (for a total of three EAs). When the CIAAs were defined, the boundaries were the same as the Group 2 EIS CIAA 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.