United States Department of the Interior
BUREAU OF LAND MANAGEMENT
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In Reply Refer To:
4160 ID130

November 26, 2013

REGISTERED MAIL

Williams, Phillip & Benjamin
1807 Danner Loop Road
Jordan Valley, OR 97910

Notice of Field Manager's Proposed Decision

Dear Sirs:

This Proposed Decision identifies grazing use under your renewed livestock grazing permit on the Bachelor Flat FFR Allotment. Thank you for working with the BLM through this permit renewal process, and for your interest in grazing the allotment in a sustainable fashion. I am confident that this proposed decision achieves those objectives. As you know, the BLM evaluated current grazing practices and current conditions in the Bachelor Flat FFR Allotment through early 2013. We undertook this effort to ensure that any renewed grazing permit on the allotment would be 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. This proposed decision incorporates those documents by reference and the information contained therein.

The BLM also conducted public scoping and met with members of the public interested in grazing issues in the Bachelor Flat FFR Allotment. The process for completing the Morgan Group Allotments Livestock Grazing Permit Renewal Preliminary Environmental Assessment (EA) EA # DOI-BLM-ID-B030-2013-0023-EA (hereinafter, "Morgan Group EA")[1] began with initiating a scoping letter on January 11, 2013. The letter requested comments and information be received by February 25, 2013 for the Bachelor Flat FFR Allotment. All comments that were received during the scoping process are addressed in the Morgan Group EA. Any comments received were addressed in the Morgan Group EA, including BLM Responses to comments considered during development of the EA. In addition to the scoping period identified above, my staff and members from the NEPA Permit Renewal Team, met with you in April of 2013, to

[1] EA number DOI-BLM-ID-B030-2013-0023-EA analyzed 5 alternatives for livestock grazing management practices to fully process permits within the Boulder Flat Allotment.

discuss your grazing permit renewal application received on June 14, 2011, current allotment conditions, and share information about your livestock operations within this allotment. During this meeting, we discussed our preliminary conclusions regarding rangeland health standards and guidelines and made grazing management recommendations associated with your grazing permit renewal application, which you updated at that time. After evaluating conditions on the land and meeting with you and the public, it became clear that resource concerns currently exist on the allotment.

On August 27, 2013, the BLM issued the completed 2013 Rangeland Health Assessments (RHA), Evaluations, and Determinations for the Group 5 Morgan allotments (which includes the Bachelor Flat FFR Allotment) to you and all interested publics of record. Issuance of the RHAs and Determinations afforded you an opportunity to meet with my staff to discuss any additional grazing management changes, your application, and to provide input for completion of the Morgan Group EA. Additionally, a preliminary environmental assessment (without a FONSI) was issued to the public on October 25, 2013, for a 15-day review and comment period. Issuance of the preliminary EA afforded yet another opportunity for grazing permittees and interested publics to provide additional input on the EA and inform me in preparation of completing this proposed grazing decision. Comments that were received were used to complete the EA.

The BLM prepared and issued the Morgan Group EA which considered a number of options and approaches to improve and maintain resource conditions. The options included consideration of your amended/updated grazing application that the BLM received in April of 2013. Overall, we considered and analyzed in detail five alternatives and considered several other alternatives not analyzed 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 Bachelor Flat FFR Allotment's natural resources conform to the goals and objectives of the Owyhee Resource Management Plan (ORMP) and the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (Idaho S&Gs). This proposed decision incorporates by reference the analysis contained in the EA. Upon implementation of this decision, your permit to graze livestock on this allotment will be fully processed.

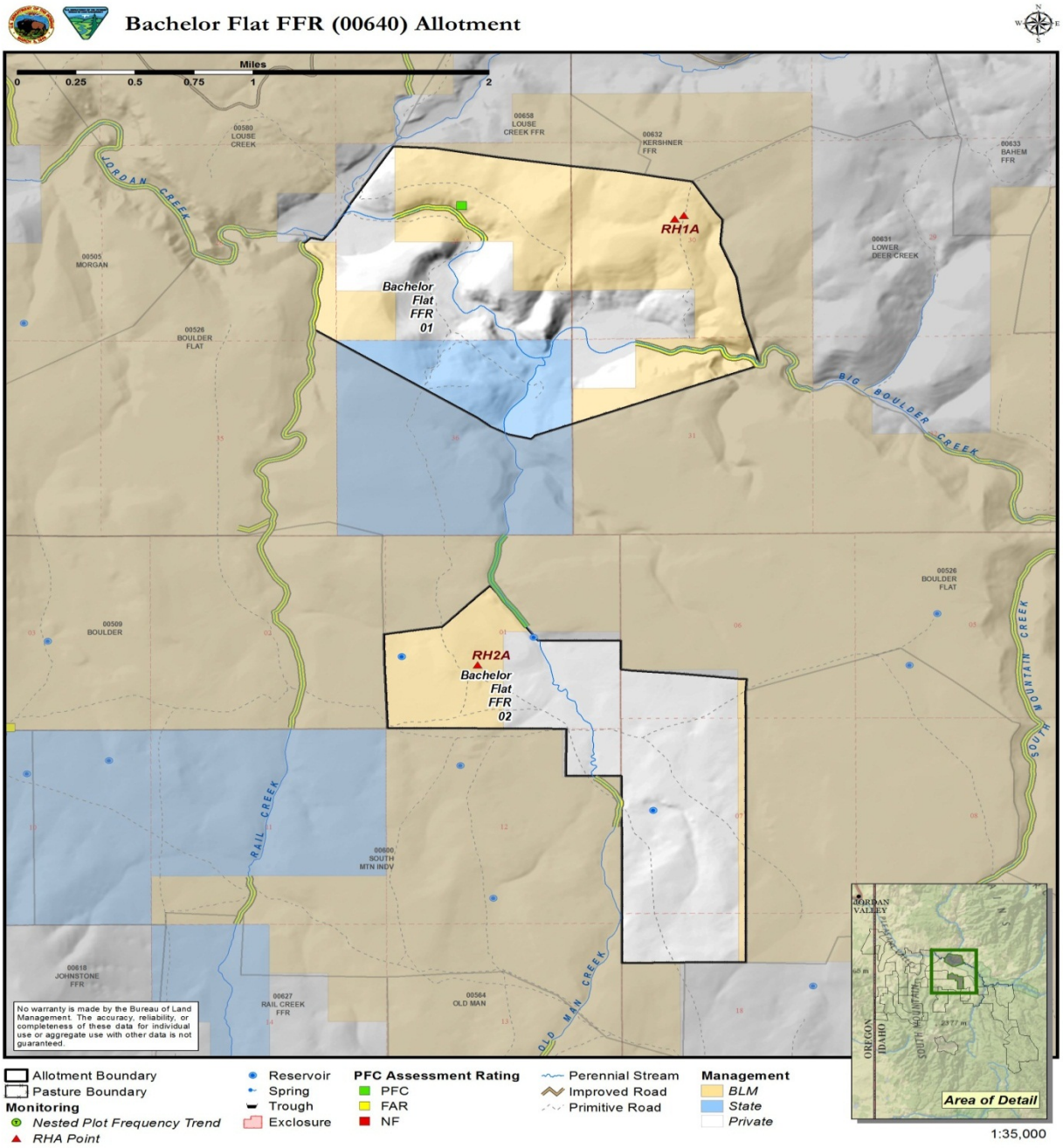
This proposed decision will:

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

Background

Allotment Setting

The Bachelor Flat FFR Allotment is located approximately 13 miles southwest of Silver City, Idaho, in Owyhee County. The allotment consists of two pastures. The northern pasture (Pasture 1) is intermingled with private lands along Big Boulder Creek and the southern pasture (Pasture 2) is intermingled with private lands along Old Man Creek. The allotment encompasses 915 acres of Public Land, 198 acres of Idaho State Land, and 1,076 acres of private land, for a total of approximately 2,189 acres.



The allotment lies 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 constrains plant and animal communities.

Elevations range from 4,600 to 5,100 feet. The annual precipitation ranges from 11 to 15 inches and the frost-free periods range from 75 to 120 days. The major landforms in the area are categorized as structural benches, foothills, and bottomlands. Soils are commonly moderately deep to hardpan loams with a slope of 1 to 35 percent. The hazard of water erosion is slight or moderate. The hazard of wind erosion is moderate. Common vegetation includes low sagebrush, Idaho fescue, bluebunch wheatgrass, and mountain big sagebrush with an occasional western juniper.

In the Owyhee Resource Management Plan (ORMP) (1999), the Bachelor Flat FFR Allotment was placed in the *Improve with low priority* Selective Management Category. Improve allotments are managed with adequate expenditure of funding and manpower to improve current unsatisfactory resource conditions. They must also meet or make progress toward meeting the Idaho Standards for Rangeland Health. The current grazing permit and the ORMP identified 127 animal unit months (AUMs) of active preference for livestock grazing.

Current Grazing Authorization

You currently graze livestock within the Bachelor Flat FFR Allotment pursuant to a grazing permit issued by the BLM. The terms and conditions of that grazing permit are as follows:

Allotment	Livestock		Grazing Period		% Public Land	Type Use	AUMs
	Number	Kind	Begin	End			
00640 Bachelor Flat FFR	125	Cattle	04/01	12/31	100	Active	127

Other Terms and Conditions:

1. The number of livestock and season of use on the Bachelor Flat FFR Allotment (# 00640) is at your discretion.
2. Livestock turnout dates are subject to Boise District Range Readiness Criteria.
3. You are required to properly complete, sign, and date an actual use report form (BLM 4130-5) for the allotment. The completed form must be submitted to this office within 15 days from the last day of your authorized annual grazing use.
4. Supplemental feeding is limited to salt, mineral, and/or energy/protein in block, granular, or liquid form. If used on public lands, these supplements must be placed at least one-quarter (1/4) mile away from any riparian area, spring, stream, meadow, aspen stand, sensitive plant species, playa, or water development.
5. Pursuant to 43 CFR 10.4(B), BLM OFO field manager must be notified 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 10.2(C), any ongoing activities connected with such discovery must be stopped immediately and a reasonable effort to protect the discovered

remains or objects must be made.

6. Changes to the scheduled use requires prior approval.
7. Trailing activities must be coordinated with the BLM prior to initiation. A trailing permit or similar authorization may be required prior to crossing public lands.
8. Livestock exclosures located within your grazing allotment are closed to all domestic grazing use.
9. Rangeland improvements must be maintained in accordance with the cooperative agreements and range improvement permits in which you are a signature or assignee. All maintenance of range improvements within a wilderness study area requires prior consultation with the authorized officer.
10. All appropriate documentation regarding base property leases, lands offered for exchange-of-use, and livestock control agreements must be approved prior to turn out. Leases of land and/or livestock must be notarized prior to submission and be in compliance with Boise District Policy.
11. Livestock grazing will be in accordance with your grazing schematic. Changes in scheduled pasture use dates will require prior authorization.
12. Utilization may not exceed 50% of the current year's growth.

As part of a U.S. District Court settlement agreement, the following terms and conditions were added to the permit in March of 2000:

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

The current permit authorizes an annual use of 127 animal unit months (AUMs[2]) of forage and a season of use between April 1 and December 31[3]; however, based on recent management actions over the last ten years, it is clear that in most years you have used the allotment with different livestock numbers and seasons compared to the numbers and dates identified in the Mandatory Terms and Conditions, utilizing the flexibility authorized in the permit. For example, in 2007 your actual use was May 1 through June 1, but actual use in 2012 was identified as December 1 through December 31.

[2] 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.

[3] Although the season of use in the grazing permit states 125 cattle and a season from 4/1-12/31 in the Mandatory Terms and Conditions, the permit states that "The number of livestock and season of use is at your discretion" in the Other Terms and Conditions, which allows flexibility.

Actual use is important when considering the renewal of a grazing permit because it was actual use and not authorized levels of use that resulted in current conditions on the allotment. In other words, the current condition of the allotment is not the result of what was authorized under the current permit, but rather is the result of the removal of a varied number of AUMs and seasons of use over the past several years.

Resource Conditions

The BLM completed a Rangeland Health Assessment, Evaluation and Determination for the Bachelor Flat FFR Allotment in 2013, and they were included in the Draft EA for your review. Evaluation and Determination documents concluded that the allotment was not meeting the following Idaho Standards for Rangeland Health: Standards 1 (Watersheds), 4 (Native Plant Communities), 7 (Water Quality), and 8 (Special Status Upland Wildlife). Current livestock grazing management is identified as a significant causal factor for not meeting Standard 1. Standards 4, 7, and 8 are not meeting because of historic livestock grazing, wildfire, invasive annual species, water quality, and upland habitat conditions. Standards 2 (Riparian) and 3 (Stream Channel) are being met.

Vegetation - uplands

The BLM's 2013 Rangeland Health Evaluation and Determination showed that the allotment is not meeting the ORMP management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas. Rangeland Health Standard 4 is not being met in Pasture 1 but is being met in Pasture 2. Although soil stability is decreasing in Pasture 2, making it at risk for future disturbance activities, all other indicators for productive native plants are maintained as appropriate to provide for proper nutrient cycling, hydrologic cycling, and energy flow. Pasture 1 shows evidence of historic grazing impacts that are present throughout the pasture, including reduced composition of deep-rooted native perennial bunchgrasses (e.g., bluebunch wheatgrass and Idaho fescue) from reference site conditions and a greater dominance by increaser species (e.g., Sandberg bluegrass and squirreltail). Historic grazing, annual invasive species and the Flint Creek Fire in Pasture 1 are the causal factors in not meeting Standard 4. Four occurrences of leafy spurge have also been identified in this allotment.[4]

Watersheds

The BLM's 2013 analysis of the Bachelor Flat FFR Allotment concluded that Standard 1 (Watersheds) is not being met. Past wildfires are the causal factors for not meeting upland watershed Standard 1 in Pasture 1; Pasture 2 is not meeting due to current livestock grazing management. The reduction in soil and hydrologic function is associated with altered plant community composition, distribution from a decreased relative abundance of large, deep-rooted native perennial bunchgrasses, and dominance of invasive annuals.

Despite relatively stable soils, watershed conditions in Pasture 1 are deteriorating due to the invasion of annual grasses and the resulting extreme departure from expected vegetative conditions. Annual invasive plants, such as cheatgrass and medusahead, dominate along with a

[4] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.1.1, 3.3.1.1.1, and the RHA/Eval/Det.

lesser component of shallow- and deep-rooted perennial bunchgrasses. Parts of the allotment have already burned several times, and the lack of shrubs and their recruitment is contributing to an extreme departure in plant community distribution and associated hydrologic function. This increases the potential to re-burn in much shorter fire intervals, which means that the remaining adjacent unburned areas are at a greater risk from the spread of invasive annuals.

Conditions in Pasture 2 are deteriorated due to commonly observed loss of soil surface horizon, active erosional features, and physical impacts from hoof action. The presence of erosion relics (historical erosional feature) and the removal of surface soils have reduced vegetative cover, as bare soils and flow paths display variable stages of stabilization. The decrease in cover from vegetation, litter, organic matter, and biological soil crusts, has reduced watershed function. Soil stability and hydrologic function is also being compromised from the lack of species diversity and the localized invasion of annuals. Recent wildfires and past and current livestock management are the primary contributing factors for not meeting Standard 1 and ORMP soil management objectives for the allotment.[5]

Water Resources and Riparian/Wetland Areas

The BLM's 2013 Rangeland Health Evaluation and Determination for the Bachelor Flat FFR Allotment concluded that Standards 2 (Riparian Areas and Wetlands) and 3 (Stream Channel/Floodplain) are currently being met. Additionally, the riparian areas that occur within the allotment are conforming to the ORMP's objective to maintain or improve these areas to attain proper functioning condition. Big Boulder (1.5 miles) and Rail Creeks (0.5 miles) are the named streams that occur within the allotment. Approximately 1.5 miles of Big Boulder Creek was most recently observed in a geologically confined canyon with woody species protecting stream banks and limited access by livestock. Approximately 0.5 mile of Rail Creek was most recently rated in Properly Functioning Condition (PFC). This reach of stream, too, occurs in a relatively deep canyon and is well armored with woody species and bedrock.

One spring was assessed and rated as PFC in Pasture 1. Although there was a dam and trampling present, the lentic area had sufficient vegetation and soil moisture characteristics present to maintain the riparian-wetland area. Therefore, current livestock grazing management practices conform with the Idaho Guidelines for Livestock Grazing Management applicable to Standard 2.

Standard 7 (Water Quality) is not meeting the Standard, but not due to current livestock management. Current IDEQ information identifies that the BLM portion of the two pastures within the allotment contain approximately 0.5 mile of stream that are not supporting the watershed's beneficial uses, 1.0 mile that is fully supporting, and 0.9 mile that has not been assessed. The allotment contains portions of three assessment units (AUs) with associated beneficial uses and pollutants. Assessment Unit # ID17050108SW004_02 is currently not supporting the beneficial uses, and all of the streams that occur within them are also on the 303(d) list of impaired waters for both temperature and mercury. However, TMDLs for temperature that identify actions on the ground to eliminate the pollutants have been developed and approved.

[5] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.1.2, 3.3.1.1.2, and the RHA/Eval/Det.

Based on the streams presence on the 303(d) list of impaired waters for mercury, Standard 7 is not being met in Pasture 1, and is not applicable to Pasture 2 (no streams are listed in the 303(d) list for this pasture). The allotment is in conformance with Guideline #10 for Livestock Grazing Management because the causal factor, mercury, cannot be attributed to livestock.[6]

Special Status Plants

No special status plants are known to occur on the Bachelor Flat FFR Allotment; therefore this will not be discussed further for this allotment.[7]

Wildlife/Wildlife Habitats and Special Status Animals

The BLM's 2013 Rangeland Health Evaluation and Determination for the Bachelor Flat FFR Allotment concluded that the allotment is not meeting Standard 8 for special status upland wildlife habitat. Pasture 1 is managed as a native plant community and is not meeting Standard 4 (see Standard 4) due to annual invasive species and past fire. An increase in annual invasive grass species indicated a transition from native bunchgrasses to more grazing-tolerant exotic species. This information is also consistent with the vegetation data from sage-grouse habitat assessments that showed less-than-adequate (marginal) occurrences of large perennial grasses. Annual species do not have the robust growth form or stature such as bluebunch wheatgrass and do not provide the plant community composition, structure, and function for sagebrush steppe-dependent species and therefore, these pastures are not meeting Standard 8 due to historic grazing practices and annual invasive species.

Although BLM found that Pasture 2 is technically meeting Standard 4 for basic proper nutrient cycling, hydrologic cycling, and energy flow requirements, 2012 sage-grouse habitat assessments on this pasture showed that some habitat types and areas of this pasture are not providing adequate habitat for sage-grouse. Specifically, portions of Pastures 2 are not providing suitable canopy cover of perennial grasses.

Overall, BLM determined that both Pastures 1 and 2 are not meeting Standard 8. BLM determined that the cause was historic grazing. Note that this allotment is capable of providing breeding, upland summer, riparian, and winter sage-grouse habitat.

This allotment lies within mapped Preliminary Priority Habitat (PPH) habitat for sage-grouse. Both sage-grouse breeding and upland summer habitat conditions in Pasture 2 were found to be unsuitable. The habitat assessments recorded marginal sagebrush canopy cover and height and unsuitable canopy cover of large perennial grasses (i.e., bluebunch wheatgrass) and forbs, indicating that functional nesting, brood-rearing, escape, and hiding cover values are not being provided in this pasture. Overall, this allotment is failing to provide adequate (unsuitable) sage-grouse habitat conditions and therefore is not meeting Standard 8 due to historic grazing practices.

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[6] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.1.3, 3.3.1.1.3, and the RHA/Eval/Det.

[7] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.1.4 and the RHA/Eval/Det.

Evaluation of Standard 7 found that waters within the allotment were not meeting Idaho water quality parameters due to mercury pollutants (see Standard 7). Columbia River redband trout are known to occur within the Jordan Creek system. This allotment is also within the distribution of the Columbian spotted frog. Spotted frogs are usually found along vigorous grassy/sedge margins of streams, lakes, ponds, springs, and marshes not far from sources of quiet permanent water. They migrate along these vegetation corridors between habitats used for spring breeding, summer foraging, and winter hibernation. Evaluation of Standard 7 identified streams not meeting water quality parameters due to mercury pollutants and elevated stream temperatures. This allotment is not providing adequate aquatic conditions to sustain viable populations of redband trout or Columbia spotted frogs, and therefore is not meeting Standard 8 due to mercury pollutants and elevated stream temperatures. Livestock grazing practices are not identified as a contributing casual factor.[8]

Guidelines for Livestock Grazing Management

In addition to a discussion of land health standards, the BLM's 2013 Determination for the Bachelor Flat FFR Allotment identified grazing management practices that did not conform to the BLM's Guidelines for Livestock Grazing Management for Idaho. Specifically, grazing management did not conform to the following guidelines:

> *Guideline 1: Use grazing management practices and/or facilities to maintain or promote significant progress toward adequate amounts of ground cover [determined on an ecological site basis) to support infiltration, maintain soil moisture storage, and stabilize soils.*
>
> *Guideline 3: Use grazing management practices and/or facilities to maintain or promote soil conditions that support water infiltration, plant vigor, and permeability rates and minimize soil compaction appropriate to site potential.*
>
> *Guideline 8: Apply grazing management practices that maintain or promote the interaction of the hydrologic cycle, nutrient cycle, and energy flow that will support the appropriate types and amounts of soil organisms, plants, and animals appropriate to soil type, climate, and landform.*

Issues

Based on the BLM's evaluation of the current grazing scheme, the current conditions on the Bachelor Flat FFR Allotment, public response to scoping, and the BLM's obligations to meet the Idaho S&Gs and move toward meeting the ORMP management objectives, the BLM identified the following resource issues applicable to the grazing permit renewal for the Bachelor Flat FFR Allotment:

> *Issue 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*

[8] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2011-0006-EA Sections 3.1.5, 3.3.1.1.4, and the RHA/Eval/Det.

to upland vegetation and watershed conditions. Specific areas of the Morgan Group allotments contain altered sagebrush community composition, structure, and function that are affecting sage-grouse and other sagebrush habitat-dependent species.

Issue 2: Riparian vegetation conditions - Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.

Issue 3: 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.

Issue 4: 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.

Issue 5: Noxious and invasive weeds - Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.

Issue 6: Livestock trailing - Trailing may adversely affect upland vegetation, soils, weeds and riparian vegetation.

Issue 7: Socioeconomic impacts - Livestock grazing affects local and regional socioeconomic activities generated by livestock production.

Issue 8: Wildfire fuels - Livestock grazing has the potential to change vegetation that may affect wildfire.

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

Analysis of Alternative Actions

Based on the current condition of the Bachelor Flat FFR Allotment and the issues identified above, the BLM considered a number of alternative livestock management schemes in the EA to ensure that any renewed grazing permit would result in the maintenance or some improved conditions on the allotment. Specifically, the BLM analyzed five alternatives in detail, identified a number of actions common to all alternatives, and considered but did not analyze in detail a number of other possible actions.[9] The BLM considered the following alternatives in detail:

[9] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2011-0006-EA Section 2.3.

- Alternative 1 - Renew the livestock grazing permit for use in the Bachelor Flat FFR Allotment consistent with the summarized actions that have led to the current conditions. The same terms and conditions of the existing permit would be included in the permit offered. Livestock would be authorized from April 1 through December 31 with 125 cattle, although livestock numbers and season of use could vary at the permittee discretion up to 127 AUMs with no AUMs in suspension.
- Alternative 2 - Renew the livestock grazing permit for use in the Bachelor Flat FFR Allotment in accordance with terms and conditions of the existing permit and as modified by the applications received from Phillip & Benjamin Williams. The number of livestock would be 125 cattle and season of use would be April 15 through November 14, although the season of use could vary at the permittees discretion up to 127 AUMs with no AUMs in suspension. Terms and conditions for stubble height, woody browse, utilization, and stream bank alteration imposed on the grazing permit by the United States District Court for the District of Idaho would not be included in terms and conditions of the offered permits.
- Alternative 3 - Renew the livestock grazing permit for use in the Bachelor Flat FFR Allotment with terms and conditions that constrain seasons, intensities, duration, and frequency of grazing use to a degree necessary to meet, make significant progress toward meeting rangeland health standards, and continue meeting all applicable ORMP objectives within pastures where identified resources are present. A three-year rotation would be in effect, and the season of use would be April 15 through June 15 in Year 1 and 2 and September 1 through November 15 in Year 3 for Pasture 1. The season of use would be June 16 through November 15 in Year 1 and 2 and June 16 through August 31 in Year 3 on Pasture 2. The number of livestock could be up to 125 cattle and up to 127 AUMs would be authorized with no AUMs in suspension.
- Alternative 4 - Renew the livestock grazing permit for use in the Bachelor Flat FFR Allotment with terms and conditions that constrain seasons, intensities, duration, and frequency of grazing use to a degree necessary to meet, make significant progress toward meeting, or maintain meeting all applicable standards and the ORMP objectives within pastures where identified resources are present (see resource constraints below). Grazing would be managed more intensively by incorporating additional deferment or rest to limit adverse impacts from livestock grazing on resource values. A three-year rest-rotation would be in effect, and the season of use would be April 15 through June 15 in Year 1, July 15 through August 31 in Year 2 and rest in Year 3 for Pasture 1. The season of use would be June 16 through November 15 in Year 1, September 1 through November 15 in Year 2, and rest in Year 3 on Pasture 2. The number of livestock could be up to 120 cattle and up to 122 AUMs would be authorized with no AUMs in suspension.
- Alternative 5 - No grazing would be authorized on public lands within the Bachelor Flat FFR Allotment for a term of 10 years. Upon expiration of the 10-year term, livestock grazing on the allotment would be reevaluated, with retention of preference (priority for grazing authorization) for approval of application(s) for grazing permit(s) attached to the current base property.

The Draft EA detailing the above alternatives was made available for public review and comment for a 15-day period starting October 25, 2013. Timely comments were received from a number of government organizations and interest groups.

Proposed Decision

After considering the current grazing practices, the current conditions of the natural resources, the alternatives and analysis in the EA, comments, as well as other information, it is my proposed decision to renew your grazing permit for ten years consistent with Alternative 3. Implementation of Alternative 3 over the next 10 years will allow the Bachelor Flat FFR Allotment to make significant progress toward meeting the Idaho S&Gs while also moving toward achieving the resource objectives outlined in the ORMP.

The terms and conditions of the renewed grazing permit will be as follows:

Table PROP 1.0. Terms and Conditions.

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00640 Bachelor Flat FFR	125	Cattle	04/15	11/15	29	Active	127

Other Terms and Conditions:

1. Grazing use will be in accordance with the grazing schedule (Table PROP 1.1) identified in the final decision of the Owyhee Field Office Manager dated _____. Changes to the scheduled use requires prior approval by the authorized officer.
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.
5. Trailing activities must be coordinated with the BLM prior to initiation. A trailing permit or similar authorization may be required prior to crossing public lands.
6. Pursuant to 43 CFR 10.4(B), the permittee must notify the BLM field manager, by telephone with written confirmation, immediately upon the discovery of human remains, funerary objects, sacred objects, or objects of cultural patrimony (as defined in 43 CFR 10.2) on federal lands. Pursuant to 43 CFR 10.4 (C), the permittee must immediately stop any ongoing activities connected with such discovery and make a reasonable effort to protect the discovered remains or objects.
7. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use.
8. Range improvements must be maintained in accordance with the cooperative agreement and range improvement permit in which you are a signatory or assignee. All maintenance of range improvements within designated Wilderness requires prior consultation with the authorized officer.
9. All appropriate documentation regarding base property leases, lands offered for exchange-of-use, and livestock control agreements must be approved prior to turn out. Leases of land and/or livestock must be notarized prior to submission and be in compliance with Boise District Policy.

10. Failure to pay the grazing bill within 15 days of the due date specified shall result in a late fee assessment of $25.00 or 10 percent of the grazing bill, whichever is greater, not to exceed $250.00. Payment made later than 15 days after the due date shall include the appropriate late fee assessment. Failure to make payment within 30 days may be a violation of 43 CFR § 4140.1(b)(1) and shall result in action by the authorized officer under 43 CFR § 4150.1 and § 4160.1.
11. Utilization may not exceed 50 percent of the current year's growth.
12. Cattle numbers may vary up to a maximum of 125 head.

Table PROP 1.1. Grazing Schedule.

Pasture	Year 1	Year 2	Year 3
Pasture 1	4/15-6/15	4/15-6/15	9/1-11/15
Pasture 2	6/16-11/15	6/16-11/15	6/16-8/31

Notes on the Terms and Conditions

You will be offered a grazing permit for a term of 10 years for the Bachelor Flat FFR Allotment. Implementation of Alternative 3 will result in no reduction or increase in AUMs from your current permit. Permitted use within the Bachelor Flat FFR Allotment will be as follows:

Active Use	Suspension	Permitted Use
127 AUMs	0	127 AUMs

Rationale

Record of Performance

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

Justification for the Proposed Decision

Based on my review of EA number DOI-BLM-ID-B030-2013-0023-EA, the rangeland health assessment/evaluation, determination, and other documents in the grazing files, it is my decision to select Alternative 3. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will continue to 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 Bachelor Flat FFR Allotment making significant progress towards meeting the resource objectives of the ORMP and the Idaho S&Gs.

Issues Addressed

Earlier in this decision I outlined the major issues that drove the analysis and decision making process for the Bachelor Flat FFR Allotment. Prior to making my decision, I considered each alternative in light of the specific issues raised within this allotment. I believe Alternative 3 best addresses those issues, given the BLM's legal and land management obligations.[10]

Issue 1: Habitat conditions for greater sage-grouse - Sage-grouse habitat health is directly related to upland vegetation and watershed conditions. Specific areas of the Morgan Group allotments contain altered sagebrush community composition, structure, and function that are affecting sage-grouse and other sagebrush habitat-dependent species.

AND

Issue 3: 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.

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[10]As you know, your allotment is part of a group of six allotments forming the Owyhee 68 Allotments, which large group is the subject of a permit renewal process to be completed by December 31, 2013. The NEPA process for the Owyhee 68 consists of 5-plus EAs and an EIS. This multiple-allotment process has required me, as the Field Manager responsible for signing these grazing decisions, to look at these allotments, and the other allotments analyzed in the EAs and the EIS, not just individually but as a members of a group of allotments located in a particular landscape, the BLM Owyhee Field Office. That is, while I am looking at your individual allotment, reviewing its RHA/Evaluation/Determination, and selecting an alternative that will best address the allotment's ecological conditions and BLM's legal responsibilities (for the purposes of this decision), I am also looking at the allotment from a landscape perspective. From this perspective, there are problems common to the Owyhee 68 Allotments.
Of the approximately 60 allotments that have riparian areas, at least 47 are not meeting S&Gs for riparian/water issues due to current livestock management; of approximately 73 allotments, 43 are not meeting the Standard for upland vegetation. In many cases, performance under Standard 8 tracks these results. Despite of 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 so on 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.

Currently this allotment is not providing adequate upland and sage-grouse habitat conditions. Under Alternative 3, upland habitat and sage-grouse habitat conditions will improve in Pasture 1 because of the grazing schedule and incorporation of grazing deferment one out of three years out of the critical growth period (May 1-June 30) (i.e.—no grazing during the critical growth period). Alternative 3 also restricts grazing one out of three years during the sage-grouse nesting/early brood-rearing period (April l-June 30). Deferment will modify the repeated spring grazing cycle and allow plants the opportunity to grow during the critical growth season. While current livestock management is not identified as a significant causal factor in this this allotment's failure to meet Standard 8, eliminating this additional stressor (grazing) one of three years will improve plant vigor and health and improve upland habitat composition and structure. Sage-grouse would benefit by the availability of increased security and escape cover during the nesting/early brood-rearing period and the decreased vulnerability of detection and predation by terrestrial and avian predators.

Currently this allotment is providing adequate riparian habitat conditions. Under Alternative 3, the proposed grazing strategy will maintain current riparian habitat conditions in this allotment. Riparian habitat composition and structure will continue to function properly and provide adequate aquatic habitat conditions for Columbia redband trout. Columbia redband trout will benefit because of the adequate stream shade, woody debris, pool development, flow regulation, and less sediment delivery to the stream habitat.

Overall, Alternative 3 will improve current conditions in Pasture 1 and show improvement of current conditions in Pasture 2. Improvement in upland and sage-grouse habitat conditions is anticipated to progress toward meeting Standard 8 because of the reduced spring grazing pressure and the improved health and vigor of the vegetation. Because upland and sage-grouse habitat conditions will show improvement and current conditions in riparian areas will continue, this allotment will make significant progress toward meeting standard 8 and ORMP objectives.[11]

Issue 2: Riparian vegetation conditions - Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.

The allotment is meeting the Standards associated with the riparian-wetland resources under current management (Alternative 1/ year-round). Under Alternative 3, the allotment will have a defined three year grazing schedule with growing season deferment incorporated one of the three years, and the impacts associated with summer grazing during the one year will be eliminated. Therefore, the riparian-wetland Standards will continue to be met under Alternative 2.[12]

Issue 4: 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

[11] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.1.2.3.4.
[12] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.1.2.3.3.

Issue 5: Noxious and invasive weeds - Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.

AND

Issue 6: Livestock trailing - Trailing may adversely affect upland vegetation, soils, weeds and riparian vegetation.

Rangeland Health Standard 4 is not being met in Pasture 1 but is being met in Pasture 2. Implementation of Alternative 3 will improve current conditions and Pasture 1 will have the opportunity to move toward meeting Standard 4 and ORMP objectives. This alternative will maintain or improve Pasture 2 already meeting Standards and ORMP objectives of vegetation communities. Alternative 3 will authorize April through June grazing in Pasture 1 two out of three years, and the other year will have fall grazing. Pasture 2 will allow repeated spring through summer grazing currently meeting standards with a maximum of 125 head of cattle and 127 AUMs. Increased years of deferment in Pasture 1 as compared to repeated spring grazing in Alternative 1 will have the opportunity to move toward meeting vegetation Standards and ORMP objectives for vegetation health and vigor. Vegetation resources not meeting ORMP vegetation management in Pasture 1 will have the opportunity to improve unsatisfactory vegetation health and vigor as compared to Alternative 1 No Action.

Although any grazing has the potential to introduce and spread invasive weeds and non-native annual grasses, the implementation of Alternative 3 will result in improved watershed function and plant vigor. As compared to Alternatives 1 and 2, the risk of invasive species spreading is lower under Alternative 3 as native perennial species' health and vigor is improved and progress is made toward the ORMP vegetation management objective. Available sites for invasive species establishment will be reduced through competition with healthy native perennial species.

Although Alternatives 4 and 5 would further reduce the potential for livestock to introduce and spread invasive and non-native annual species as compared to Alternative 3, livestock remain only one of a number of vectors for seed dispersal and soil surface disturbance. BLM's coordinated and ongoing weed control program would still be required in the absence of livestock grazing in the allotment.[13]

Issue 7: Socioeconomic impacts - Livestock grazing affects local and regional socioeconomic activities generated by livestock production.

During the NEPA and public comment process, a concern was raised that selection of certain alternatives could impact regional socio-economic activity. I share this concern, and have taken this 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 Bachelor Flat FFR Allotment in large part because the selection accomplishes those latter goals.

[13] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.3.1.2.3.1, 3.3.1.2.3.2, and 3.3.1.2.3.3.

Consideration of Alternatives 1 and 2 disclosed that neither alternative would allow the allotment to meet Idaho S&Gs or the ORMP resource objectives. Therefore I could not select them despite the lesser economic impacts that they may have. 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 provided by healthy ecosystems and alternate socio-economic resources, such as recreation, that rely on healthy, functional and aesthetically pleasing open spaces and wildlife habitats.

I have considered a wide range of issues at the allotment level, including the social and economic impacts that result from modifying grazing authorizations. I have minimized reductions in grazing use levels 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.[14]

Issue 8: Wildfire fuels - Livestock grazing has the potential to change vegetation that may affect wildfire.

During the NEPA process, some asked the BLM to consider using grazing to limit wildfire. The BLM has considered the issue and determined that it would be theoretically possible to use targeted grazing to create fuel breaks on these allotments with the hope that those fuel breaks would help control the spread of large wildfires in the area. However, the resource costs associated with this strategy are such that I have decided against it. Ultimately, implementation of Alternative 3 for the Bachelor Flat 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 this allotment at a pasture-wide scale. In addition, the levels of livestock grazing and the season of yearly use necessary to reduce fine fuels prior to the fire season are not conducive to sustaining native perennial herbaceous species. This is one of the main reasons a targeted grazing system to control fire is not viable on these allotments at this time. The BLM's current permit renewal is focused on improving native upland and riparian plant communities on this allotment, and targeted grazing to create fuel breaks would not support that improvement.

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

[14] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.1.2.3.6.

accumulation of continuous fine fuels and extreme fire behavior, while enhancing post-fire recovery.[15]

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

Climate change is another factor I considered in building my decision around Alternative 3 for the Bachelor Flat FFR Allotment. Climate change is a stressor that can reduce the long-term competitive advantage of native perennial plant species. Since livestock management practices can also stress sensitive perennial species in arid sagebrush steppe environments, I considered the issues together—albeit based on the limited information available on how they relate in actual range conditions. Although the factors that contribute to climate change are complex, long-term, and not fully understood, the opportunity to provide resistance and resilience within native perennial vegetation communities from livestock grazing induced impacts is within the scope of this decision. The selected alternative combined seasons, intensities, and durations of livestock use to promote long-term plant health and vigor thereby providing resistance and resilience to additional stressors, including climate change.

Additional Rationale

The BLM attempted to develop grazing management that responds to your allotment's specific resource needs, geography, and size. These considerations were made to address all concerns and requirements mandated to the BLM. Each allotment has different ecology and management capability due to the size and location/topography that result 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. I recognize the difficulty of not only providing the mandated needs for the resources, but also the needs and capability that you, the permittee have. I believe I have balanced those needs of the resource and your capabilities with the information I have to the extent possible.

I did consider selecting Alternatives 1, 2, 4, and 5 for this allotment. Based on all the information used in developing my decision, I believe that the BLM can meet resource objectives and still allow grazing on the allotments, which is why I did not select Alternative 5 (No Grazing). In selecting Alternative 3 for the Bachelor Flat FFR Allotment rather than Alternatives 1, 2, 4, or 5, I especially considered (1) BLM's ability to meet resource objectives using the selected alternatives, (2) the impact of implementation of Alternative 5 on you, and (3) your past performance under previous permits.

[15] For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3.

Finding of No Significant Impact (FONSI)

A finding of no significant impact (FONSI) was signed on November 20, 2013, and concluded that the proposed decision to implement Alternative 3 is not a major federal action that will have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. That finding was based on the context and intensity of impacts organized around the 10 significance criteria described at 40 CFR § 1508.27. For those reasons, an environmental impact statement is not required. A copy of the FONSI for EA number DOI-BLM-ID-B030-2013-0023-EA is available on the web at:

http://www.blm.gov/id/st/en/prog/nepa_register/owyhee_grazing_group/grazing_permit_renewal3.html

Conclusion

In conclusion, it is my decision to select Alternative 3 over the other four alternatives analyzed because livestock management practices under this selection best meet the ORMP objectives allotment-wide and the Idaho S&Gs.

Authority

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

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

Right of Protest and/or Appeal

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

Loretta V. Chandler
Owyhee Field Manager

Copies sent to:

Group 5 Proposed Decision Mail List

Company	Name		Address	City	ST	ZIP	#
Friends of Mustangs	Robert	Amidon	8699 Gantz Ave.	Boise	ID	83709	1
Soil Conservation District	Cindy	Bachman	PO Box 186	Bruneau	ID	83604	2
	Conrad	Bateman	740 Yakima St.	Vale	OR	97918	3
Idaho Dept. of Agriculture	John	Biar	PO Box 790	Boise	ID	83707	4
Boise District Grazing Board	Stan	Boyd	PO Box 2596	Boise	ID	83701	5
	Gene	Bray	5654 W El Gato Ln.	Meridian	ID	83642	6
Colyer Cattle Co.	Ray & Bonnie	Colyer	31001 Colyer Rd.	Bruneau	ID	83604	7
	Senator: Mike	Crapo	251 East Front Street STE 205	Boise	ID	83702	8
Owyhee County Natural Resources Committee	Jim	Desmond	PO Box 38	Murphy	ID	83650	9
Land & Water Fund	William	Eddie	PO Box 1612	Boise	ID	83701	10

Company	Name		Address	City	ST	ZIP	#
Western Watershed Projects	Katie	Fite	PO Box 2863	Boise	ID	83701	11
Gusman Ranch Grazing Association LLC	Forest	Fretwell	27058 Pleasant Valley Rd.	Jordan Valley	OR	97910	12
	Chad	Gibson	16770 Agate Ln.	Wilder	ID	83676	131
Resource Advisory Council	Chair: Gene	Gray	2393 Watts Lane	Payette	ID	83661	415
	Russ	Heughins	10370 W Landmark Ct.	Boise	ID	83704	16
Jaca Livestock	Elias	Jaca	817 Blaine Ave.	Nampa	ID	83651	17
Idaho Wild Sheep Foundation	President: Jim	Jeffress	PO BOX 8224	Boise	ID	82707	18
	Dan	Jordan	30911 Hwy. 78	Oreana	ID	83650	19
	Floyd	Kelly Breach	9674 Hardtrigger Rd.	Given Springs	ID	83641	20
	Kenny	Kershner	PO Box 300	Jordan Valley	OR	97910	21
	Vernon	Kershner	PO Box 38	Jordan Valley	OR	97910	22
	Lloyd	Knight	PO Box 47	Hammett	ID	83627	23
	Congressman: Raul	Labrador	33 E. Broadway Ave STE 251	Meridian	ID	83642	24
The Fund for the Animals, Inc.	Andrea	Lococo	1363 Overbacker	Louisville	KY	40208	25
LU Ranching	Tim	Lowry	PO Box 132	Jordan Valley	OR	97910	26
Idaho Wild Sheep Foundation	Herb	Meyr	570 E 16th N.	Mountain Home	ID	83647	27
R&S Enterprise	Ray	Mitchell	265 Millard Rd.	Shoshone	ID	83352	28
	Brett	Nelson	9127 W. Preece St.	Boise	ID	83704	29
	Ramona	Pascoe	PO Box 126	Jordan Valley	OR	97910	30
	Anthony & Brenda	Richards	8935 Whiskey Mtn. Rd.	Murphy	ID	83650	31
	Senator: James E.	Risch	350 N 9th Street STE 302	Boise	ID	83702	32
Idaho Conservation League	John	Robison	PO Box 844	Boise	ID	83701	33
	John	Romero	17000 2X Ranch Rd.	Murphy	ID	83650	34
	Bob	Salter	6109 N. River Glenn	Garden City	ID	83714	35
Intermountain Range Consultants	Bob	Schweigert	5700 Dimick Ln.	Winnemucca	NV	89445	36
	Congressman: Mike	Simpson	802 West Bannock STE 600	Boise	ID	83702	37
Shoshone-Bannock Tribes	Tribal Chair: Nathan	Small	PO Box 306	Ft. Hall	ID	83203	38
Juniper Mtn. Grazing Association	Michael	Stanford	3581 Cliffs Rd.	Jordan Valley	OR	97910	39
	John	Townsend	8306 Road 3.2 NE	Moses Lake	WA	98837	40

Company	Name		Address	City	ST	ZIP	#
Moore Smith Buxton & Turcke	Paul	Turcke	950 W. Bannock, Ste. 520	Boise	ID	83702	41
Natural Resources Defence Council	Johanna	Wald	111 Sutter St., 20th Floor	San Francisco	CA	94104	42
Office of Species Conservation	Cally	Younger	304 N. 8th STE 149	Boise	ID	83702	43
Owyhee County Commissioners			PO Box 128	Murphy	ID	83650	44
Holland & Hart LLP			PO Box 2527	Boise	ID	83701	45
Idaho Cattle Association			PO Box 15397	Boise	ID	83715	46
IDEQ			1410 N. Hilton	Boise	ID	83701	47
Idaho Dept. of Lands			PO Box 83720	Boise	ID	83720	48
Idaho Farm Bureau Fed.			PO Box 167	Boise	ID	83701	49
International Society for the Protection of Horses & Burros	Karen	Sussman	PO Box 55	Lantry	SD	57636	50
Oregon Division State Lands			1645 NE Forbes Rd., Ste. 112	Bend	OR	97701	51
Owyhee Cattlemen's Association			PO Box 400	Marsing	ID	83639	52
Schroeder & Lezamiz Law Offices			PO Box 267	Boise	ID	83701	53
Sierra Club			PO Box 552	Boise	ID	83701	54
State Historic Preservation Office			210 Main St.	Boise	ID	83702	55
State of Nevada Div. of Wildlife			60 Youth Center Rd.	Elko	NV	89801	56
The Nature Conservancy			950 W. Bannock, Ste. 210	Boise	ID	83702	57
The Wilderness Society			950 W. Bannock St., Ste. 605	Boise	ID	83702-5999	58
U.S.F.W.S. Idaho State Office			1387 S. Vinnell Way, Ste. 368	Boise	ID	83709	59
USDA Farm Services			9173 W. Barnes	Boise	ID	83704	60
Western Watershed Projects			PO Box 1770	Hailey	ID	83333	61
Josephine Ranch	Steve	Boren	1050 N. Briar Lane	Bosie	ID	83712	62
Lequerica & Sons Inc.	Tim	Lequerica	PO Box 113	Arock	OR	97902	63
	Robert	Thomas	17947 Shortcut Rd.	Oreana	ID	83650	64
Idaho Fish & Game	Rick	Ward	3101 S. Powerline Rd.	Nampa	ID	83686	65

Company	Name		Address	City	ST	ZIP	#
Ranges West			2410 Little Weiser Rd.	Indian Valley	ID	83632	66
	Craig & Rhonda	Brasher	4401 Edison	Marsin	ID	86369	67
Corral Creek Crazing Assoc.	Tim	Lequerica	P.O. Box 135	Arock	OR	97902	68
LU Ranching	Bill	Lowry	PO Box 132	Jordan Valley	OR	97910	69
	Sandra	Mitchell	PO Box 70001	Boise	ID	83707	70
Paula Ashby	c/o: Scott	Ashby	P.O. Box 247	Bruneau	ID	83604	71
Wintercamp Ranch Trust	Don	Barnhill	P.O. Box 1	Murphy	ID	83650	72
	Dale	Berrett	3540 Hwy 95	Jordan Valley	OR	97910	73
Oregon Natural Desert Association	Brent F	Fenty	50 S. W. Bonds St. #4	Bend	OR	97702	74
	Thomas	Gluch	P.O. Box 257	Jordan Valley	OR	97910	75
Chipmunk Grazing Association	Elias	Jaca	PO Box 175	Marsing	ID	83639	76
	Loetta	Larsen	P.O. Box 156	Jordan Valley	OR	97910	77
Poison Creek Grazing Association LLC	Tim	Mackenzie	PO Box 443	Homedale	ID	83628	78
	Teo & Sarah	Maestrejuan	26613 Pleasvant Valley Rd.	Jordan Valley	OR	97910	79
	WF & Carolyn	Peton	P.O. Box 998	Veneta	OR	97487	80
Morgan Properties	David	Rutan	P.O. Box 277	Jordan Valley	OR	97910	81
06 Livestock	Dennis	Stanford	P.O. Box 167	Jordan Valley	OR	97910	82
South Moutain Grazing Coop	Terry	Warn	P.O. Box 235	Jordan Valley	OR	97910	83
	Phillip & Benjamin	Williams	1807 Danner Loop Rd	Jordan Valley	OR	97910	84
Idaho Dept. of Parks & Recreation	Director		PO Box 83720	Boise	ID	83720	85
Wroten Land & Cattle Co			30314 Juniper Mtn. Rd	Jordan Valley	OR	97910	86
Quintana Ranch LLP	Tim	Quintana	3876 Hwy. 95	Homedale	ID	83628	87