



United States Department of the Interior
BUREAU OF LAND MANAGEMENT

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In Reply Refer To:
4160 ID130

REGISTERED MAIL

November 26, 2013

Dale Berrett
3540 Highway 95
Jordan Valley, OR 97910

Notice of Field Manager's Proposed Decision

Dear Mr. Berrett:

Thank you for your application for permit renewal on the Berrett FFR (0609) allotment. Thank you as well for working with the BLM during the permit renewal process; I appreciate your interest in grazing the allotment in a sustainable fashion and am confident that this proposed decision achieves that objective.

As you know, the BLM evaluated current grazing practices and current conditions in the Berrett FFR allotment through 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, a rangeland health assessment, evaluation and determination was completed. This proposed decision incorporates by reference the information contained in those documents.

On January 11, 2013, the Owyhee Filed Office initiated by letter the collective public scoping for Groups 3 through 5 of the Owyhee 68 grazing permit renewal process. These groups are referred to as the Toy Mountain, South Mountain and Morgan Groups, respectively. The Boulder allotment is one of 19 allotments in the Morgan Group. The scoping letter informed recipients that the purpose of the public outreach effort was to identify resource and management issues associated with the Idaho Rangeland Health Standards and Guidelines (Idaho S&Gs) and the Owyhee Resource Management Plan (ORMP) for the purpose of developing grazing management alternatives for all three NEPA groups, including the Morgan Group Allotments Livestock Grazing Permit Renewal Preliminary Environmental Assessment (EA) EA # DOI-BLM-ID-B030-2013-

0023-EA (hereinafter, “Group 5 EA”)¹. The letter encouraged comments and information to be received by February 25, 2013, to better identify issues associated for the Group 5 allotments. Comments were addressed in the Group 5 EA.

On August 27, 2013, BLM issued the completed 2013 Rangeland Health Assessments (RHA), Evaluations, and Determinations for the Group 5 Morgan allotments (for which includes the Berrett FFR allotment) to you and all interested public 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 Group 5 EA. Additionally, a preliminary environmental assessment (without a Finding of No Significant Impact) was issued to the public on October 25, 2013, for 15-day review and comment. Issuance of the preliminary EA afforded yet another opportunity for grazing permittees and interested publics to provide additional input on the EA in preparation of completing a proposed grazing decision. In regards to both documents, you did not provide additional comments or information to assist in the development of alternatives and eventually this proposed decision.

After evaluating current resource conditions on public lands associated with the Berrett FFR allotment, and meeting with you and reviewing information provided during the scoping and review periods, it is clear that some resource concerns currently exist on this allotment; in some cases, current livestock grazing management is a significant causal factor or an influencing factor.

To assist us in addressing livestock impacts to public land resources, my office prepared and issued the Group 5 EA in which we considered a number of options and approaches to maintain and improve resource conditions. Specifically, the BLM considered and analyzed in detail five alternatives for the Berrett FFR allotment. We also considered other alternatives that we did not analyze in detail. Our goal 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 resource conditions on this allotment is consistent with 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 Group 5 EA.

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

This proposed decision will:

- Describe current conditions and issues on the Berrett FFR allotment;
- Respond to the applications for grazing permit renewal for use in the Berrett FFR allotment;
- Outline my proposed decision to select Alternative 3 for Berrett FFR allotment; and

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

- Explain my rationale for selecting Alternative 3.

Background

Allotment Setting

General

The Morgan Group allotments, which are within the Owyhee Field Office, are located adjacent to one another within the northern portion of Owyhee County, Idaho. They occupy the central portions of the Owyhee Mountains south-southeast of Jordan Valley, Oregon. Elevations range from around 4,483 feet in the Walt’s Pond FFR allotment to 6,491 feet in the Rail Creek FFR allotment.

The Berrett FFR allotment is located near South Mountain, in Owyhee County, Idaho, approximately 30 miles south of Mud Flat Road. The allotment is comprised of four pastures, with pasture 1, 3 and 4 including public land (BLM), and pasture 2 (private and State lands). The allotment contains 886 public land acres (18%), 2,065 private acres (41%), and 2,077 State acres (41%) (See attached map).

Current Grazing Authorization

You currently graze livestock within the Berrett FFR allotment pursuant to a grazing permit issued by the BLM. The terms and conditions of that grazing permit are:

Table CGA-1: Dale Berrett - Current Term Grazing Permit

Allotment	Livestock		Grazing Period		% PL	Type AUMs	Active Use	Suspended AUMs	Permitted AUMs
	Number	Kind	Begin	End					
Berrett FFR (0609)	112	Cattle	4/15	12/31	100	Active	114	0	114

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 _____.
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.
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. A Minimum 4 inch stubble height will be left on herbaceous vegetation within the riparian area along .5 miles of Williams Creek in the Berrett FFR allotment at the end of the growing season as identified in the fisheries objective of the Owyhee EIS.
 12. Livestock grazing will be in accordance with your allotment grazing schedule(s). Changes in scheduled pasture use dates will require prior authorization.
 13. Utilization may not exceed 50 percent of the current year's growth.

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.

Current Grazing Management

Based on management actions over the last ten years, it is clear that in most years you have used this allotment with different livestock numbers and seasons compared to the numbers and dates identified in the Mandatory Terms and Conditions.

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.

The current permit authorizes 114 AUMs within four pastures, and a season of use between April 15 and December 31, annually. Actual use reports submitted between 2008-2012 shows that active AUMs ranged from 108-112 AUMs, with livestock grazing occurring from May 1 through November 1 consistently. From 1997-2007, actual use reports were only submitted for 1998, 2003 and 2005. In 1998, actual use reports show that 114 AUMs were reported with grazing occurring from January 1 through December 31. In 2003, 31 AUMs from April 16 through May 16 were reported; and in 2005, 90 AUMs from June 1 through October 15 were reported.

Current Resource Conditions

The following sections provide a brief overview of current resource conditions as extracted from the Group 5 EA and the 2013 Rangeland Health Assessments, Evaluations, and Determinations for the Berrett FFR allotment. Resources presented include: *Vegetation - Uplands, Watersheds (soils), Water Resources and Riparian/Wetlands Areas, and Wildlife/Wildlife Habitats and Special Status Animals*. What will not be discussed further will be Special Status Plants because no special status plant populations are known to occur within this allotment.

The BLM completed a land health assessment, evaluation, and a determination for the Berrett FFR Allotment in 2013 (issued on August 27, 2013). As described in the RHA and Determination document, BLM concluded that some of the resources on the Berrett FFR Allotment are not meeting the Idaho Rangeland Health Standards and Guidelines (S&Gs). Specifically, the BLM determined that the allotment did not meet Standards 1 (Watersheds), 2 (Riparian), 3 (Stream Channel), 4 (Native Plant Communities), and 8 (Wildlife); however, Standard 7 (Water Quality) is being met. Current livestock grazing management practices were a significant causal factor in not meeting the Standards 1, 2, 3, and 8.

Vegetation - uplands

The Berrett FFR allotment includes four pastures, in which pastures 1 and 3 are meeting Standard 4, and pasture 4 is not meeting the standard and historic and invasive species are the causal factors for not meeting the standard. Pasture 2 is all private land and will not be discussed any further. Although soil disturbance and bare ground in pasture 1 (old pasture 1 split into pastures 1 and 4) are at moderate departure on the RHA site, leaving 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 in pasture 1. Evidence of historic grazing impacts (greater than expected rabbitbrush and historic soil movement and displacement) are present throughout pasture 4, with the reduced composition of deep-rooted native perennial bunchgrasses (e.g., bluebunch wheatgrass and Idaho fescue) from reference site conditions.

The ORMP management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas is also not met in pasture 4. Vegetation communities shifting to dominance of shallow-rooted bunchgrasses and increased invasive annuals lead to a conclusion that the vegetation management objective is not met.

Watersheds

As presented in the Group 5 EA (see Sections 3.1.2 and 3.3.5.2.1), current livestock grazing management practices are a significant causal factor for not meeting watershed Standard 1 in the Berrett FFR allotment in pastures 1 and 4 (formerly part of pasture 1); pasture 2 is private and pasture 3 is meeting the standard. In pasture 1, relics from historic and active erosional processes are distinct. Significant livestock trailing activities has promoted a decline in deep-rooted perennial bunchgrasses and the pasture shows a shift to shallow-rooted species. As a result, increased bare ground and degraded soil structure has promoted soil surface loss and degradation.

In pasture 4, mechanical disturbance from hoof shearing and trampling has led to extensive pedestaling, leaving soils churned and exposed. Vegetative cover and biologic soils crusts are reduced, especially within interspatial areas, and contribute to reduced soil stability and hydrologic function.

The decreased ecological function, impaired soils, and use during the critical growing season in the absence of rest indicate that soil and hydrologic function are compromised. Current and past livestock management are the primary contributing factors for not meeting Standard 1 and ORMP soil management objectives of improving unsatisfactory watershed health/conditions in the Berrett FFR allotment.

Water Resources and Riparian/Wetland Areas²

Standards 2 and 3 are not being met in pastures 1 and 4 of the Berrett FFR allotment. A reach of Williams Creek that traverses pasture 4 was twice assessed as functional-at-risk (FAR) because there were areas where the channel was over-wide for the channel type, the sinuosity was out of balance for the valley type, and some areas had vertical and lateral instability. Another short reach of Williams Creek that occurs in pasture 1 was visited in 2011, and observations indicated that the reach appears to be in PFC. Approximately 1.0 mile of Pole Bridge Creek was assessed as FAR in 2000, primarily due to the stream's sinuosity and width-to-depth ratios were out of balance for the valley type, and there was an inadequate composition and age class of deep-rooted riparian species to protect streambanks. In addition, it was identified that the stream is vertically instable along the reach surveyed.

Subsequent to the FAR assessment, one MMIM (Modified Multiple Indicators Monitoring) site was established on the same reach of Pole Bridge Creek in pasture 1. The median stubble height was 3.6 inches, woody use was 9.7 percent, and streambank alteration was 41 percent. The metrics for stubble height and streambank alteration exceed the standards appropriate for maintenance of healthy riparian areas and stream channels.

One spring that occurs in pasture 1 and one that occurs in pasture 4 were assessed in 2011 and 2012. The unnamed spring in pasture 1 was classified as PFC, but the unnamed spring in pasture 4 was assessed as not functioning (NF). The spring had been heavily impacted by livestock from

² For additional details on the current condition of the allotment, see *Initial Allotment and Permit/Lease Review and Rangeland Health Assessment and Determination for the Berrett FFR (0609) Allotment* document in the project record.

removal of both herbaceous and woody vegetation and trailing and trampling. Only mature and decadent woody species remain with no herbaceous understory and a high percent of bare ground present creating erosion and sedimentation.

Standard 7 is being met in this allotment according IDEQ³ on Williams Creek within the Berrett FFR allotment. The other streams within the allotment have not been assessed by IDEQ and Standard 7 is not applicable in pasture 3. The allotment is in conformance with the Guidelines for Livestock Grazing Management.

Wildlife/Wildlife Habitats and Special Status Animals

Upland Habitat

Pastures 1 and 3 in the Berrett FFR are meeting Rangeland Health Standard 4. Sage-grouse assessment information in pasture 3 found conditions to be suitable and supports the summary for Standard 4. As evidenced by the favorable summaries of Standard 4 and sage-grouse assessments, these pastures are providing minimum composition and structure for sagebrush steppe-associated species.

Pasture 4 in the Berrett FFR allotment is not meeting Standard 4 due to historic livestock grazing management practices. The plant community has transitioned to a plant community dominated by smaller, more grazing-tolerant species such as Sandberg's bluegrass and annual invasive species, including medusahead and cheatgrass. These species do not have the robust growth form or stature such as bluebunch wheatgrass and do not provide the plant composition, structure, and function for sagebrush steppe-dependent species. Therefore, this allotment is not providing adequate upland habitat conditions for sagebrush steppe species and is not meeting Standard 8 due to historic grazing practices and invasive species.

Riparian Habitat

Evaluation of Standards 2 and 3 determined that streams and springs within this allotment are not properly functioning due to historic and current livestock grazing. Streams and springs that are NF or FAR are lacking adequate riparian vegetation composition and distribution to provide the structure and function to support productive riparian environments. As mentioned above under *Water Resources and Riparian/Wetland Areas* above, Williams Creek and Pole Bridge Creek were rated FAR, in addition to one unnamed spring rated NF. Because Standards 2 and 3 are not being met, and this allotment is not providing adequate riparian habitat conditions to support viable aquatic and terrestrial species populations, the Berrett FFR allotment is not meeting Standard 8 due to historic and current grazing practices.

Focal Species

Sage-grouse

A total of 2,719 acres of sage grouse Preliminary Priority Habitat⁴ (PPH) exists in pastures 1 and 4 of the Berrett FFR allotment (Group 5 EA, Section 3.3.2). The PPH that fails within this allotment consists of 729 acres (27%) of sagebrush dominated habitat and 1,990 acres (73%) of

³ See Group 5 EA Section 3.1.3 for additional IDEQ information regarding the Berrett FFR allotment.

⁴ PPH habitat acreage totals include public lands, state lands, and private property.

PPH sagebrush can also include small amounts of perennial grasslands, conifer encroachment, and non-habitat.

habitat with varying degrees of western juniper encroachment affecting sage grouse habitat. The Berrett FFR allotment is unique in that the pastures are not contiguous and range in elevation from approximately from 5,000 feet to over 7,000 feet. There are no active leks in this allotment. This allotment provides seasonal breeding, upland summer, riparian, and winter habitat for sage-grouse. Pasture 1 is providing marginal breeding and upland summer habitat conditions, and pasture 3 is providing suitable upper elevation summer habitat conditions.

Pasture 4 is not meeting Standard 8 for sage-grouse because of an overabundance and height of the sagebrush overstory with a mixed (spreading/columnar) shape, combined with a less-than-desirable canopy cover of perennial grasses, although the combined height of perennial grasses and forbs was favorable. These overstory/understory conditions have reduced nesting, hiding, and escape value for sage-grouse during the breeding and late brood-rearing periods. Because cover values are inadequate, this allotment is not meeting Standard 8 for sage-grouse due to historic livestock grazing practices.

Columbia Redband Trout and Columbia Spotted Frog

This allotment is not identified as falling within the modeled distribution of the Columbia spotted frog. Columbia River redband trout are known to occur within the Williams Creek system (Group 5 EA Section 3.3.2). Evaluation of Standards 2 and 3 identified streams and springs within this system that are not properly functioning due to current grazing practices. Redband trout require intact channels with well-developed riparian communities that stabilize banks to minimize erosion and create undercuts, minimize impacts of flood events and filter sediments, provide shade to reduce water temperatures, and contribute woody debris to create channel structure and regulate seasonal flows. Because these in-stream and near-stream habitat characteristics are not adequately represented, this allotment is not providing adequate riparian conditions to sustain viable populations of redband trout and is not meeting Standard 8.

Guidelines for Livestock Grazing Management

In addition to a discussion of land health standards, the BLM's 2013 Determination for the Berrett 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 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 functions. Adverse impacts due to livestock grazing will be addressed.

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

Guideline 11: Use grazing management practices developed in recovery plans, conservation agreements, and Endangered Species Act, Section 7 consultations to maintain or improve habitat for federally listed threatened, endangered, and sensitive plants and animals.

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

Issues

Based on the BLM's evaluation of the current livestock grazing management practices, the current conditions on the Berrett 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 Berrett FFR Allotment:

Issue 1: Habitat conditions for greater sage-grouse (Centrocercus urophasianus; hereinafter, 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.

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 resource conditions on the Berrett FFR allotment and the issues identified above, BLM considered a number of alternative livestock grazing management schemes and changes in the Group 5 EA to ensure that the renewed Dale Berrett grazing permit will 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.⁵ The alternatives analyzed in detail include the following:

- *Alternative 1 - Current Situation*
- *Alternative 2 - Applicant's Proposed Action*
- *Alternative 3 - BLM developed alternative with resource constraints and deferment*
- *Alternative 4 - BLM developed alternative with resource constraints, deferment and or rest, and Active AUM reductions*
- *Alternative 5 - No Grazing*

Proposed Decision

After considering the current livestock grazing management practices, the current conditions of the natural resources, the alternatives and analysis in the Group 5 EA, comments received from you and other interested publics, as well as other information, it is my proposed decision to renew your grazing permit for ten years consistent with Alternative 3 of EA # DOI-BLM-ID-B030-2013-0023-EA. Implementation of Alternative 3 over the next 10 years will allow the Berrett 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 Dale Berrett grazing permit will be as follows:

⁵ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3.

Table PROP 1.0. Terms and Conditions.

Allotment	Livestock		Grazing Period		% PL	Type AUMs	Active Use	Suspended AUMs	Permitted AUMs
	Number	Kind	Begin	End					
Berrett FFR (0609)	200	Cattle	4/15	11/15	16	Active	114	0	114

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 _____.
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.
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.
13. Within pasture 4; a minimum of 6 inch stubble height, 30 percent browse (where applicable), and less than 10 percent bank alteration will be maintained in key riparian

areas at the end of the grazing season.

14. Berrett FFR Allotment - Cattle numbers may vary up to 200 head as long as the total active use AUMs by pasture or allotment and permitted season of use are not exceeded annually.

Table PROP 1.1. Berrett FFR Allotment - Grazing Schedule.

Berrett FFR Allotment (0609)			
Pasture	Year 1	Year 2	Year 3
Pasture 1	4/15-7/15	4/15-6/30	9/1-11/15
Pasture 2 (Private) ¹	3/1-2/28	3/1-2/28	3/1-2/28
Pasture 3	4/15-10/15	4/15-10/15	7/1-8/31
Pasture 4	7/1-10/15	7/1-10/15	10/1-11/15

¹Pasture 2 was left in the allotment boundary and is a used in conjunction with BLM lands to establish 16 percent public land.

Notes on the Terms and Conditions

You will be offered a grazing permit for a term of 10 years for the Berrett FFR allotment. Implementation of Alternative 3 will result in no reductions in active AUMs and permitted use within the Berrett FFR Allotment will be as follows:

Operator	Allotment	Active Use	Suspension	Permitted Use
Dale Berrett	Berrett FFR	114 AUMs	0	114 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 Berrett 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 the Group 5 EA number DOI-BLM-ID-B030-2013-0023-EA, the 2013 rangeland health assessments/evaluations, determinations, 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 Berrett 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 Berrett FFR allotment. I want you to know that I considered each alternative in light of the specific issues raised in conjunction with this allotment before I made my decision. My selection of Alternative 3 was in large part because of my understanding that this selection best addressed those issues, given the BLM's legal and land management obligations.

Issue 1: Habitat conditions for greater sage-grouse (Centrocercus urophasianus; hereinafter, 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 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.

Deferred rotation grazing schedules provide for one or more years of grazing use after seed-set, following one or more years of growing season use. Moderate utilization levels (40-60%) at either deferred or rest-rotation grazing systems can allow for adequate recovery of upland herbaceous root growth and associated carbohydrate storage following the impact of critical-season defoliation. Additional years of deferment or rest increase opportunity for recovery and maintenance of plant health and vigor improve. Implementing these grazing practices (deferment and rest) will improve or maintain native rangeland species to attain composition, density, foliar cover and vigor appropriate to site potential (USDI BLM 1999b) can help achieve desired conditions for native plant communities. The grazing rotation and schedule promotes species diversity and productivity, seed and root production, and seedling establishment. Establishment of desirable seedlings into a vegetation community may require a sequence of deferment years to avoid defoliation and physical impacts of livestock presence.

Alternative 3 includes April through July grazing in pasture 1 and 3, two out of three years. In year three, grazing will occur after August 31 in pasture 1; and after June 30 in pasture 3. In pasture 4, livestock grazing will occur July through October during years one and two, and October through November in year three. Implementation of Alternative 3 will institute a deferred grazing rotation which will reduce the frequency of livestock grazing during the spring growing season compared to the current situation. Increased years of deferment will allow opportunity for recovery and maintenance of plant health and vigor to improve (Bailey and Brown 2011). Livestock grazing in accordance with this 3-year deferred grazing rotation will continue to meet vegetation standards and maintain satisfactory ORMP objectives for vegetation health and conditions in pasture 1 and 3. Livestock grazing beginning after June 30 each year will improve bunchgrass health and vigor due to avoidance of critical growing season grazing in pasture 4. In general, grazing management in accordance with Alternative 3 will maintain and improve herbaceous vegetation health and vigor, and meet Standard 4 and ORMP vegetation management objectives.

Alternative 3 will provide a minimum of 1 out of 3 years of deferment from spring grazing and critical growing season use for pastures 1 and 3 (pasture 2 is private), and yearly deferment to benefit soil and plant communities in pasture 4. This grazing rotation will result in reduced physical impacts to soils during the wettest period of the year (March 1-May 15) and increase the ability of native plant communities to remain healthy, vigorous, and productive during the critical growing season.

Currently this allotment is providing adequate upland and sage-grouse habitat conditions in pasture 1 and 3 and is not meeting Standard 8 in pasture 4 (Group 5 EA Section 3.3.2.1.4). Under Alternative 3, the 3-year deferred grazing rotation will improve habitat composition and structure, and benefit sage-grouse by increasing security and escape cover, and forage, during the nesting/early brood-rearing period (April 1-June 30). Increased security and escape cover will reduce vulnerability of detection and predation in pastures 1 and 3. In pasture 4, upland and sage-grouse habitat improvements will occur because the grazing rotation incorporates 1 in 3 years of deferment during the critical growth period (May 1-June 30). This prescription also allows for increased security and escape cover during the nesting/early brood-rearing period. Sage-grouse habitat conditions would improve because of the increased security and escape cover elements available during the nesting/early brood-rearing period and the reduced vulnerability to detection and predation by terrestrial and avian predators.

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

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.

Alternative 3 will provide a minimum of 1 out of 3 years of deferment from spring grazing and critical growing season use for pastures 1 and 3 (pasture 2 is private), and yearly deferment to benefit soil and plant communities in pasture 4. Consequently, within the allotment, 2.2 miles of perennial, 2.4 mile of intermittent stream, and one spring will be affected by the impacts associated with the spring, summer, and fall seasons of grazing alternately over the course of a three-year rotation.

The Berrett FFR allotment is currently (under Alternative 1/year-round) not meeting the standards associated with the riparian-wetland resources. Under Alternative 3, the allotment would be managed under a defined three year grazing schedule that incorporates riparian area constraint period deferment one of the three years in the pastures that contain riparian areas (pastures 1 and 4). This rotation includes grazing one in three years after August 31 for both pastures 1 and 4. In addition, pasture 1 will be grazed between April 15 and June 30 in year one, and April 15 and July 15 in year two. In general, grazing in pasture 1 would avoid grazing during July and August 2 of out every 3 year rotation. Grazing as such will decrease impacts from livestock congregating within

the riparian areas of canyons and draws during the hot summer months, decreasing the degree of livestock grazing and physical streambank damage overall. Furthermore, other mandatory terms and conditions of the permit under this alternative include assurances that would reduce impacts (stubble height, woody browse, and bank alteration) within the riparian areas when grazed. This monitoring would be required within pasture 4, where grazing would occur two out of three years during portions of the riparian constraint period⁶. Adherence to the prescribed grazing rotation and achieving the other terms and conditions will allow for making significant progress towards meeting Standards 2 and 3 and in meeting ORMP objectives RPN-1 and FISH-1.

Currently this allotment is not providing adequate riparian function and aquatic habitat conditions (Section 3.3.2.1.4). Under Alternative 3, reduced grazing pressure along with identified terms and conditions (i.e. stubble height, woody browse, and bank alteration; Section 2.4.2.3) will improve herbaceous and woody plant communities within riparian areas and benefit Columbia redband trout because of the increased stream shade, woody debris, flow regulation, and less sediment delivery. As riparian habitat function improves, stream, wetland, and spring habitats will benefit by the regeneration and establishment of herbaceous and woody species. The quality of aquatic habitats will improve as banks stability improves, erosion is reduced and sediment delivery minimized. Columbia redband trout will further benefit because of the absence of livestock activity in aquatic habitats during the spring spawning period (March 15–June 15), allowing improved survival of eggs and fry. Under this Alternative, current riparian conditions will improve and make significant progress toward meeting Standard 8 and ORMP objectives.

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.

Although no noxious weeds are known exist on public land in this allotment, invasive annuals (medusahead and cheatgrass) are found in areas of each allotment. The dominant visual aspect in this allotment is sagebrush with Sandberg bluegrass dominating the understory, while bluebunch wheatgrass and western juniper are common. Although some invasive species are present, the native plant community is generally healthy and capable of competing for resources. Under Alternative 3, current resource conditions are expected to improve for all Standards and meet ORMP objectives.

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.

⁶ See EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.4.2.3 for more details regarding Alternative 3 Resource Constraints.

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 Berrett FFR allotment in large part because the selection accomplishes those latter goals, while minimizing the reduction in active AUMs.

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 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 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.⁷

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 this allotment 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 Berrett 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

⁷ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.1.2.3.6.

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 this allotment 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 accumulation of continuous fine fuels and extreme fire behavior, while enhancing post-fire recovery.⁸

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 Berrett 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. Assuming that climate change affects the arid landscapes in the long-term, the native plant communities on this allotment will be better armed to survive such changes. The native plant health and vigor protected under this alternative will provide resistance and resilience to additional stressors, including climate change.

Additional Rationale

Considerable amount of thought and effort went into developing 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,

⁸ For more detailed discussion, please refer to EA number EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3.

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. However, based on all the information used in developing my decision, I believe that the BLM can meet resource objectives and still allow grazing on the allotment. In selecting Alternative 3 for the Berrett 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.

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 A, is not a major federal action that will have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. That finding was based on the context and intensity of impacts organized around the 10 significance criteria described at 40 CFR § 1508.27. Therefore, an environmental impact statement is not required. A copy of the FONSI for EA number DOI-BLM-ID-B030-2013-0023-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 Berrett 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 public may protest the proposed decision under Sec. 43 CFR § 4160.1 and 4160.2, in person or in writing within 15 days after receipt of such decision to:

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

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

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

In accordance with 43 CFR § 4160.3(b), upon a timely filing of a protest, after a review of 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 person 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,



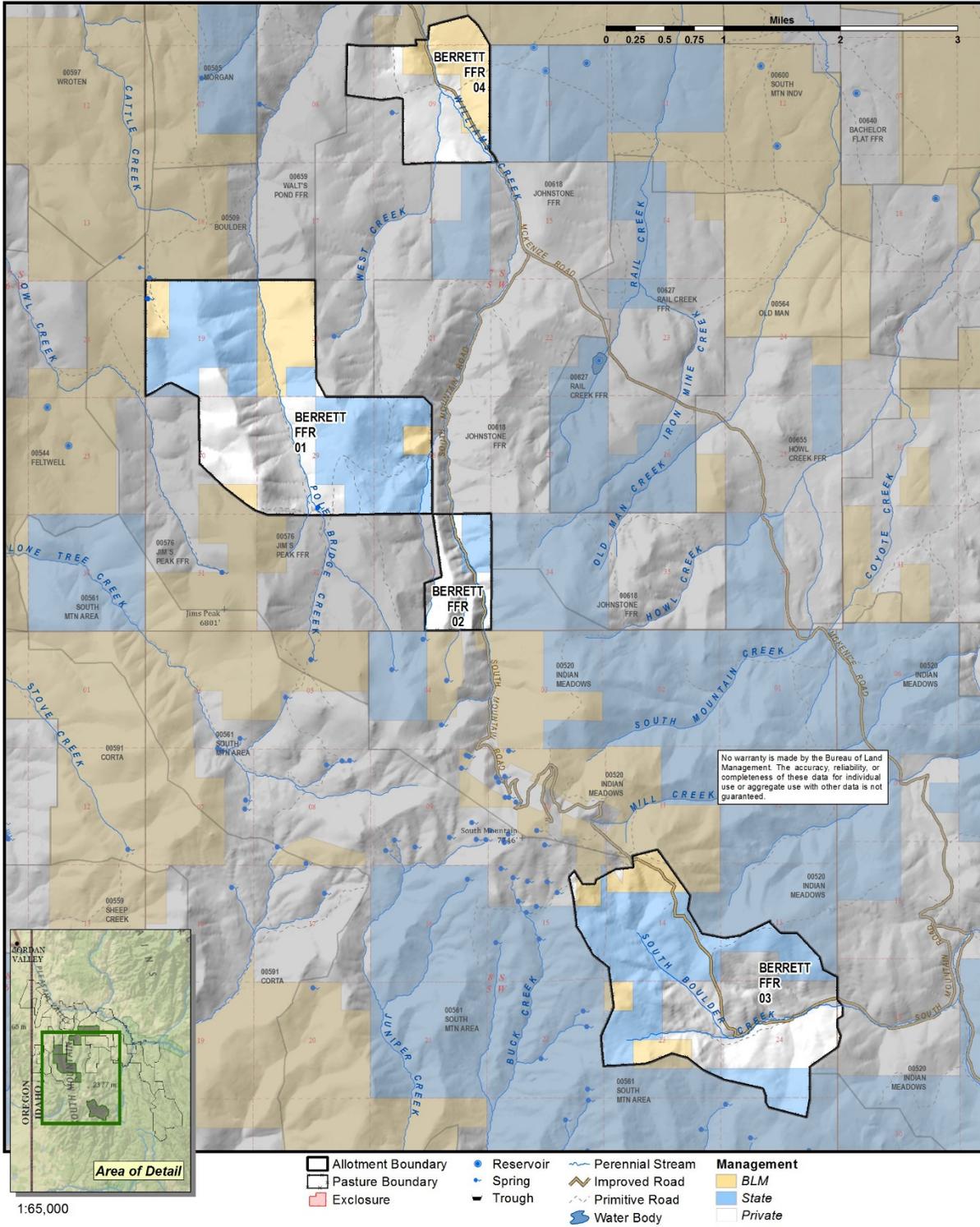
Loretta V. Chandler
Owyhee Field Manager

Copies sent to:

- See attached Group 5 Mail List



Map 1: Berrett FFR (00609) Allotment



1:65,000

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
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

Company	Name		Address	City	ST	ZIP	#
	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
Moore Smith Buxton & Turcke	Paul	Turcke	950 W. Bannock, Ste. 520	Boise	ID	83702	41
Natural Resources Defence Council	Johanna	Wald	111 Sutter St., 20 th Floor	San Francisco	CA	94104	42
Office of Species Conservation	Cally	Younger	304 N. 8 th 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

Company	Name		Address	City	ST	ZIP	#
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
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	Maestresjuan	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

Company	Name		Address	City	ST	ZIP	#
South Mountain 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