



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

Tom Gluch
Box 257
Jordan Valley, OR 97910

Terry Warn
Box 235
Jordan Valley, OR 97910

Notice of Field Manager's Proposed Decision

Dear Mr. Gluch and Mr. Warn:

This Proposed Decision identifies grazing use under your renewed livestock grazing permits on the Glass Creek Allotment. Thank you both 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 that objective.

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

The BLM also conducted public scoping and met with members of the public interested in grazing issues in the Glass Creek 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 (Morgan Group EA),¹ which includes the Glass Creek

¹ EA number DOI-BLM-ID-B030-2013-0023-EA analyzed 4 alternatives for livestock grazing management practices to fully process permits within the Glass Creek Allotment.

Allotment, began with a scoping letter dated January 11, 2013. The letter requested comments and information be received by February 25, 2013, for the Glass Creek Allotment. All comments received are addressed in the Morgan Group EA, including BLM Responses to comments considered during development of the EA.

In addition, my staff and members from the NEPA Permit Renewal Team met with you on April 19, 2013, to discuss your grazing permit renewal application (received in May of 2011), current allotment conditions, and your livestock operations within this allotment. During this meeting, we discussed with you 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. I would like to thank you for submitting a grazing application and proposed grazing schedule that carefully considered and addressed resource issues on the allotment.

After evaluating conditions on the land and meeting with you and the public, it became clear that resource concerns currently exist on the Glass Creek Allotment.

On August 27, 2013, the BLM issued completed 2013 Rangeland Health Assessments (RHA), Evaluations, and Determinations for the Morgan Group allotments (which includes the Glass Creek 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 any additional input for completion of the Morgan Group EA. Additionally, a preliminary EA (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 another opportunity for grazing permittees and interested publics to provide additional input on the EA to inform this proposed grazing decision. We met with you on November 14, 2013, and you provided comments which we considered in preparation of the EA and this decision.

To assist us in our analysis of livestock impacts to public land resources, the BLM prepared and issued the Morgan Group EA which considered a number of options and approaches to improve and maintain resource conditions on these allotments. Specifically, 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 permittees) and to consider options that, if selected, would ensure that the Glass Creek 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.

I am now prepared to issue a proposed decision to renew your permit to graze livestock within the Glass Creek Allotment. This decision is the culmination of a comprehensive review of the relationship between resource conditions and livestock grazing practices on the Glass Creek 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 allotment;

- Briefly discuss the alternative grazing management schemes that the BLM considered in the EA;
- Respond to the applications for grazing permit renewal for use in the Glass Creek Allotment;
- Outline my proposed decision to select Alternative 2; and
- Explain my reasons for proposing this decision.

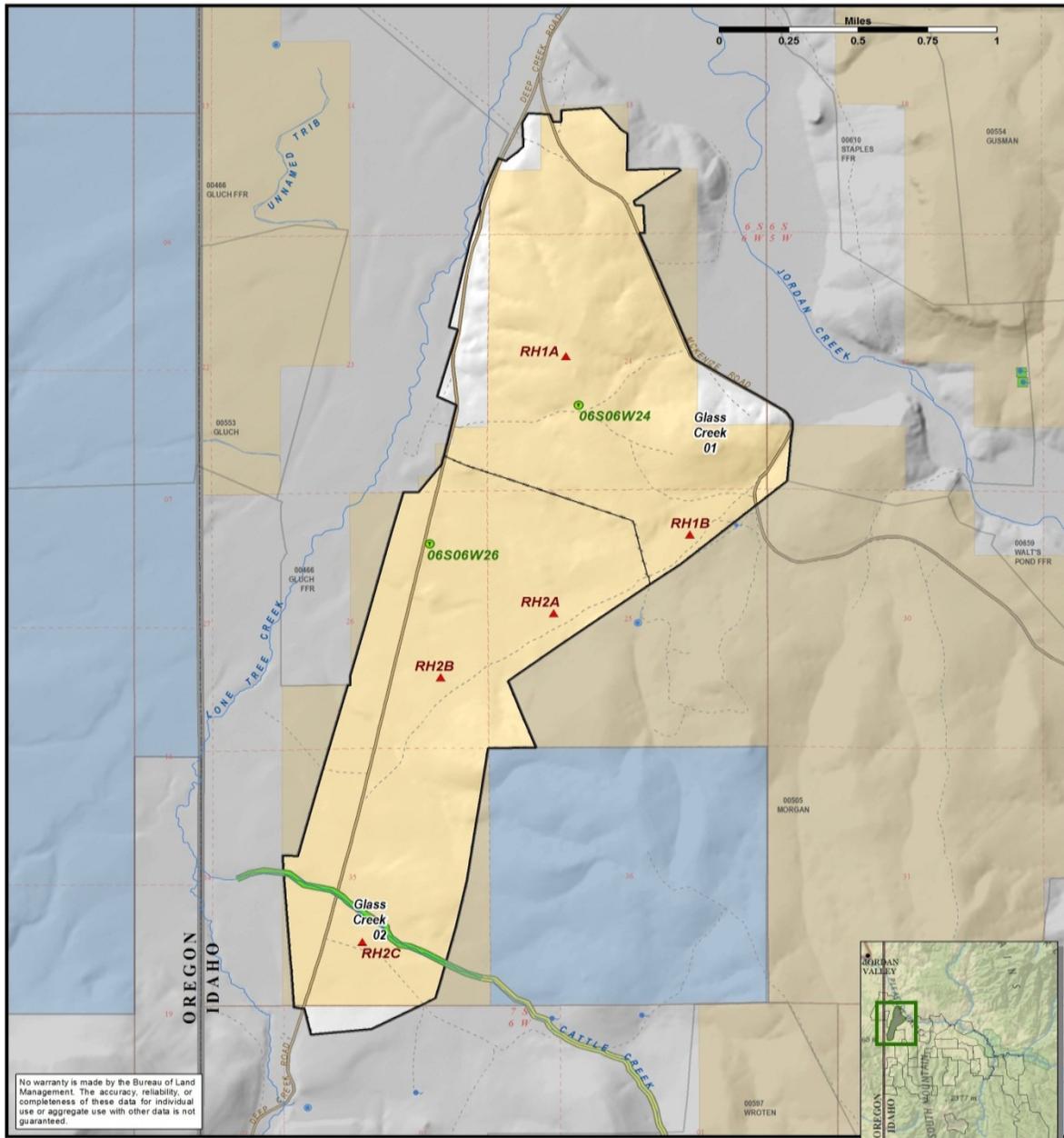
Background

Allotment Setting

The Glass Creek Allotment is approximately 5 miles south of Jordan Valley, Oregon. It is located southwest of Silver City and north of South Mountain (Map 1) and is part of the South Mountain Core Area. The allotment has two pastures (Pasture 1 and Pasture 2) and consists of 1,756 acres, of which 1,627 acres are public land and 130 acres are privately owned; there are no state lands in this allotment.

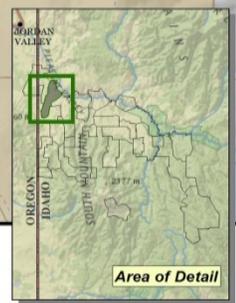


Map 1: Glass Creek (00552) Allotment



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

- | | | | | |
|-----------------------------|-----------|------------------------------|------------------|-------------------|
| Allotment Boundary | Reservoir | PFC Assessment Rating | Perennial Stream | Management |
| Pasture Boundary | Spring | PFC | Improved Road | BLM |
| Monitoring | Trough | FAR | Primitive Road | State |
| Nested Plot Frequency Trend | Exclosure | NF | | Private |
| RHA Point | | | | |



1:30,000

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 4,500 to 4,800 feet. The terrain varies from flat lowlands to rolling hills and steep side slopes. Most landform features are rhyolitic in origin and consist of valley bottomlands, foothills, and perennial and ephemeral drainages. The majority of the soils in the allotment are shallow to moderately deep and well drained. Soils are clayey to loamy and vary in surface and subsurface rock fragments. These soils formed in residuum and alluvium derived predominantly from welded rhyolitic tuff. The area is primarily represented by Loamy 11-13” ecological sites with basin big sagebrush/bluebunch wheatgrass plant communities and Shallow Claypan 12-16” ecological sites with low sagebrush, bluebunch wheatgrass, and Idaho fescue plant communities. A 1981 prescribed fire burned approximately 550 acres, most of which were within Pasture 1. The burned area was drill seeded with crested wheatgrass, alfalfa, yellow sweet clover and four-wing saltbush.

In the ORMP, the Glass Creek Allotment was placed in the *Maintain* Selective Management Category. Maintain allotments are managed with minimal expenditure of appropriated funds and maintained for current satisfactory resource conditions. They must also meet or make progress toward meeting the Idaho S&Gs. The current grazing permits and the ORMP identified 139 Active Animal Unit Months (AUMs)² for livestock grazing.

Current Grazing Authorization

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

Table CGA 1.1. Tom Gluch:

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00552 Glass Creek	49	Cattle	04/16	05/31	87	Active	65

Table CGA 1.2. Terry Warn:

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00552 Glass Creek	49	Cattle	04/16	05/31	100	Active	74

*Standard Terms and Conditions applicable to all BLM grazing permits and leases are not reiterated here, but apply to the above permits.

The following “Other Terms and Conditions” apply to the above permits.

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.

Other terms and conditions:

1. Turnout is subject to Boise District Range Readiness Criteria.
2. Your certified actual use report is due within 15 days of completing your authorized annual grazing use.
3. Salt and/or supplement shall not be placed within one-quarter (1/4) mile of springs, streams, meadows, aspen stands, playas, or water developments.
4. Changes to the scheduled use require prior approval.
5. Trailing activities must be coordinated with the BLM prior to initiation. A trailing permit or similar authorization may be required prior to crossing public lands.
6. Livestock exclosures located within your grazing allotment are closed to all domestic grazing use.
7. 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.
8. 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.
9. 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.
10. Livestock grazing will be in accordance with your grazing schematic. Changes in scheduled pasture use dates will require prior authorization.
11. 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 applied 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 permits authorize an annual use of 139 Active AUMs of forage and a season of use between April 16 and May 31. Based on recent management actions over the last several years,

it is clear that you have used the allotment during the same seasons as 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.

Resource Conditions

The BLM completed a Rangeland Health Assessment (RHA), Evaluation, and Determination for the Glass Creek Allotment in 2013, which 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 Standards 1, 4, 7, and 8. The allotment is meeting Standards 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplains), and 5 (Seedings). Standard 6 (Exotic Plant Communities other than Seedings) does not apply.

Vegetation – uplands

Rangeland Health Standard 4 is not being met in Pasture 2 of the allotment; Pasture 1 is a seeding and, as such, is evaluated under Standard 5, which it is meeting. Three occurrences of Scotch thistle and one occurrence of whitetop have been identified in this allotment, although this is not at a level that would contribute to the failure to meet Rangeland Health Standards.

Pasture 1: Although annual invasive plants are increasing on the site, making it at risk for future disturbance activities, all other indicators for Standard 5 are maintained as appropriate to provide for proper nutrient cycling, hydrologic cycling, and energy flow on the allotment. Overall interpretations of trend data suggest that grass frequency conditions are primarily static; frequency trend data show that biotic conditions and diversity of perennial species are not diminishing over time.

Qualitative rangeland health assessment data indicate that the plant community at this site is adequate, both in structure and function, to support a diversity of perennial plant species.

The ORMP management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas is also met within Pasture 1. Maintaining the seeding in Pasture 1 leads to a conclusion that the vegetation management objective is being met by maintaining life form diversity, production, nutrient cycling, energy flow and the hydrologic cycle.

Pasture 2: Evidence of historic grazing impacts are present throughout the allotment, with the 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), including invasive annuals. Repeated spring grazing in Pasture 2 during the active growing season (April 11–June 6) is a causal factor for that

pasture's not meeting Standard 4. Idaho fescue no longer occurs at the trend site, possibly due to heavy utilization (such as 70% utilization on Idaho fescue recorded in 1999).

Qualitative RHA data indicate that Standard 4 is not being met due to the departure of functional-structural groups in three RHAs. These sites are dominated by shallow-rooted bunchgrass and invasive annuals, rather than the ecological reference site conditions with dominance by deep-rooted species (bluebunch wheatgrass and Idaho fescue). This conclusion is supported by current ecological site descriptions and correlation to vegetation inventories. Trend data suggest that the continuing deterioration of biotic conditions due to the near-absence of deep-rooted bunchgrasses and increasing annual invasive plants on the site has compromised the biotic integrity of the site.

The ORMP management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas is also not met within Pasture 2. Trend data show a lack of improvement in vegetation communities dominated by shallow-rooted bunchgrasses in pasture 2, along with the expansion of annual invasive grasses, leading to a conclusion that the vegetation management objective is not met.³

Watersheds

Current and past livestock grazing management practices are significant causal factors for not meeting upland watershed Standard 1 in Pastures 1 and 2 of the allotment. A lack of post-fire recovery from past seeding efforts in Pasture 1, and invasive annuals, especially in Pasture 2, also contribute to not meeting Standard 1.

Localized soil impacts were recorded in both pastures and include mechanical impacts from hoof action associated with current spring livestock grazing. In Pasture 1, however, this is not the only determining factor for impaired upland watershed integrity. Where past drill seeding occurred, bare ground continues to be greater than expected, and flow paths and pedestaling have increased. Long-term ground cover shows no improvement and does not meet ORMP objectives.

The reduction in soil and hydrologic function is associated with post-fire altered plant community composition and distribution due to decreased relative abundance of large, deep-rooted native perennial bunchgrasses and an increase in invasive species. Sagebrush has established after the seeding but has a relatively low presence in this prescribed burned area. Cheatgrass has increased significantly and contributes to an ongoing decline in hydrologic function and nutrient availability.

Invasive annuals are also the cause for a decline in soil conditions in Pasture 2. Frequency trend data displays continuing deterioration of biotic conditions due to the near absence of deep-rooted bunchgrasses and invasion of annuals. Over the long term, the long-lasting negative impacts of invasive annuals to hydrologic function and soil productivity cause a decline in soil and cause the allotment to not meet ORMP objectives.

³ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.1.1, 3.3.9.1.1, and the RHA/Eval/Det.

The decreased ecological function and impaired soils indicate that soil and hydrologic function are compromised due to mechanical impacts from spring grazing, a lack of post-fire soil recovery within the seeding, and declining biotic conditions from the continued spread of invasive annuals. The ability for proper nutrient cycling, hydrologic cycling, and energy flow is impaired so that Standard 1 and ORMP soil management objectives of improving unsatisfactory watershed health/conditions are not met in the allotment.⁴

Water Resources and Riparian/Wetland Areas

Standards 2 and 3 are being met in the Glass Creek Allotment. The short reach (0.9 mile) of Cattle Creek that traverses Pasture 2 has been assessed twice. In 2000 it was functioning-at-risk (FAR) with an upward trend and areas along the stream did not have adequate vegetation to protect the stream banks, and some lateral instability was observed. In 2011, the reach was in proper functioning condition (PFC) because there was a functional floodplain, the riparian species were adequate and vigorous, and there was woody species regeneration.

Current Idaho Department of Environmental Quality (IDEQ) information indicates that the BLM portions of the two pastures of the allotment contain approximately 0.7 mile of stream that are not supporting the watershed's beneficial uses and 2.2 miles that have not been assessed. The allotment contains portions of two assessment units (AUs) with associated beneficial uses and pollutants. AU # ID17050108SW002_02 is currently not supporting the beneficial uses. All of the streams that occur within this AU are on the 303(d) list of impaired waters and Standard 7 is not being met in the allotment and is not in conformance with the Guidelines for Livestock Grazing Management because livestock contribute to the E. Coli pollutant. The other AU in the allotment does not have any 303(d) listed streams on public land.⁵

Special Status Plants

No special status plants are known to occur on the Glass Creek Allotment.⁶

Wildlife/Wildlife Habitats and Special Status Animals

The Glass Creek Allotment provides seasonal breeding, upland summer, riparian, and winter habitat for sage-grouse. Breeding and upland summer habitat conditions for sage-grouse in the allotment were found to be unsuitable. Habitat assessments showed that marginal conditions exist in Pasture 1 (a seeding) and unsuitable conditions exist in Pasture 2 (a native plant community) due to the decreased occurrence of perennial grasses that are a critical component to understory structure and function during all phases of the year. Because of the reduced occurrence and absence of perennial grasses in both pastures, this allotment is not providing adequate nesting, hiding, and escape cover for sage-grouse during the breeding and late-brood rearing periods and is therefore not meeting Standard 8 due to past and current (due to a decrease

⁴ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.1.2, 3.3.9.1.2, and the RHA/Eval/Det.

⁵ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.1.3, 3.3.9.1.3, and the RHA/Eval/Det.

⁶ 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.

in native perennial bunchgrasses, ie. Idaho fescue no longer being at the site) livestock grazing practices.

Pasture 1: This pasture is managed as a seeded plant community, dominated by crested wheatgrass, Sandberg bluegrass, and cheatgrass. There is one active lek known to occur within the pasture. Functioning wildlife habitat in the low sagebrush habitat type requires an overstory/understory interface of sagebrush and perennial grasses that create vegetation composition and structure to provide small and large mammals and birds security cover and forage resources. Re-seeded communities inherently do not sustain the diversity of species associated with native plants communities. However, as a surrogate, the low sagebrush overstory and the crested wheatgrass understory are providing adequate composition and structure that can be expected for a pasture seeded with an exotic species of perennial grass. The co-dominance of cheatgrass is a concern, and habitat conditions can be expected to decline as this species increases.

Pasture 2: This pasture is managed as native plant community and has been determined to be not meeting Standard 4 due to past and current livestock grazing practices. An active lek is documented adjacent to the boundary fence of Pasture 2 in the Morgan Allotment. Currently, the herbaceous understory component is transitioning from a bluebunch wheatgrass reference community to a Sandberg bluegrass-cheatgrass community. These species do not have the robust growth form or stature and do not provide the plant composition, structure, and function for sagebrush steppe dependent species. Due to the downward trend in the plant community and the lack of larger bunchgrasses, this allotment is failing to provide adequate upland habitat conditions for sagebrush steppe species and is not meeting Standard 8 due to past and current livestock practices (due to a decrease in native perennial bunchgrasses, ie. Idaho fescue no longer being at the site).

Evaluation of Standard 7 determined that 0.7 miles of streams within this allotment are not meeting water quality standards for Rangeland Health Standards. Beneficial uses of these streams include water quality parameters that support cold-water aquatic species. Because analysis of Standard 7 has identified streams that are not meeting water quality parameters and that livestock grazing is a casual factor, these riparian conditions are therefore not meeting Standard 8 for wildlife due to historic and current grazing practices. No documented redband trout waters or modeled distribution of the Columbia spotted frog occur within this allotment.⁷

Guidelines for Livestock Grazing Management

In addition to a discussion of land health standards, the BLM's 2013 Determination for the Glass Creek 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

⁷ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2011-0006-EA Sections 3.1.5, 3.3.9.1.4, and the RHA/Eval/Det.

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

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

Guideline 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 9: Apply grazing management practices to maintain adequate plant vigor for seed production, seed dispersal, and seedling survival of desired species relative to soil type, climate, and landform.

Guideline 10: Implement grazing management practices and/or facilities that provide for complying with the Idaho Water Quality Standards.

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.

Issues⁸

Based on the BLM's evaluation of the current grazing scheme, the current conditions on the Glass Creek 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

⁸ Issues identified in EA number DOI-BLM-ID-B030-2013-0023-EA Section 1.6.3 that were not present within the Glass Creek Allotment are not discussed in this decision.

following resource issues applicable to the grazing permit renewal for the Glass Creek 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 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 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 Glass Creek 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. Alternatives 1, 2, 4, and 5 were considered in detail and analyzed for the Glass Creek Allotment. The BLM considered the following alternatives in detail:

- Alternative 1 - Renew the livestock grazing permit for use in the Glass Creek Allotment consistent with the summarized actions that have led to the current conditions. The same terms and conditions as those in the existing permit would be included in the permit offered. Four Interim Terms and Conditions imposed by the United States District Court for the District of Idaho would continue.
- Alternative 2 - Renew the livestock grazing permit for use in the Glass Creek Allotment in accordance with terms and conditions within the application received in April 19, 2013 from Tom Gluch and Terry Warn. A three-year rotation would be in effect, and the number of livestock would be up to 98 cattle (49 cattle for each of you) for 139 Active AUMs with no AUMs in suspension.
- Alternative 4 - Renew the livestock grazing permit for use in the Glass Creek 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. A three-year rotation would be in effect, the number of livestock could be up to 98 cattle, and 73 Active AUMs would be authorized.
- Alternative 5 - No grazing would be authorized on public lands within the Glass Creek Allotment for a term of 10 years.

The Draft EA detailing the above alternatives was made available for public review and comment for a 15-day period starting October 25, 2013. In addition to timely comments received from you, a number of government organizations and interest groups also provided comments.

Proposed Decision

After considering the current grazing practices, the current conditions of the natural resources, the alternatives and analysis in the EA, and comments received from you and other interested publics, as well as other information, it is my proposed decision to renew your grazing permit for ten years consistent with Alternative 2. Implementation of Alternative 2 over the next ten years will allow the Glass Creek 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. Tom Gluch – Terms and Conditions.

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00552 Glass Creek	50	Cattle	04/16	06/15	87	Active	65

*The “Other Terms and Conditions” below also apply to the Tom Gluch Grazing Permit.

Table PROP 1.1. Terry Warn – Terms and Conditions.

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			

00552 Glass Creek	50	Cattle	04/16	06/15	100	Active	74
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*Standard Terms and Conditions applicable to all BLM grazing permits and leases are not reiterated here, but apply to the above permits.

Other Terms and Conditions:

1. Grazing use will be in accordance with the grazing schedule (Table PROP 1.2) identified in the final decision of the Owyhee Field Office Manager dated _____. Changes to the scheduled use require 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 50 head each as long as your total Active AUMs are not exceeded (Tom Gluch – 65 Active AUMs, Terry Warn – 74 Active AUMs).

Table PROP 1.2. Grazing Schedule.

Pasture	Year 1	Year 2	Year 3
Pasture 1	4/16-6/15	4/16-6/15	Rest
Pasture 2	Rest	Rest	4/16-6/15

Notes on the Terms and Conditions

You will be offered a grazing permit for a term of ten years for the Glass Creek Allotment. Implementation of Alternative 2 will result in no change in AUMs from your current permit. Permitted use within the Glass Creek Allotment will be as follows:

Table PROP 1.3. Permitted Use.

Permittee	Active Use	Suspension	Permitted Use
Tom Gluch	65 AUMs	0 AUMs	65 AUMs
Terry Warn	74 AUMs	0 AUMs	74 AUMs

Rationale

Justification for the Proposed Decision

Based on my review of EA number DOI-BLM-ID-B030-2013-0023-EA, the rangeland health assessment, evaluation, and determination, and other documents in the grazing files, it is my proposed decision to select Alternative 2. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will fulfill the BLM’s obligation to manage the public lands under the Federal Land Policy and Management Act’s multiple use and sustained yield mandate and will result in the Glass Creek Allotment making significant progress towards meeting the resource objectives of the ORMP and the Idaho S&Gs.

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 grazing permit holders for the Glass Creek Allotment, and have determined that you have a satisfactory record of performance and are qualified applicants for the purposes of a permit renewal.

Issues Addressed

Earlier in this decision I outlined the major issues that drove the analysis and decision making process for the Glass Creek Allotment. Prior to making my decision, I considered each alternative in light of the specific issues raised within this allotment. I believe Alternative 2 addresses those issues given the BLM’s legal and land management obligations.⁹

⁹As you know, your allotment is part of a group of allotments forming the Owyhee 68 Allotments, which is the subject of a permit renewal process to be completed by December 31, 2013. The NEPA process for the Owyhee 68 consists

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 the riparian community may affect the health and sustainability of fish and amphibian populations.

Currently, this allotment is providing adequate upland habitat conditions for wildlife (generally) in Pasture 1 (a seeding), but not in Pasture 2 (a native plant community). For sage-grouse, Pastures 1 and 2 were found not to provide adequate habitat conditions for nesting/early brood-rearing and late brood-rearing sage-grouse.

Pasture 1: The seeded community is providing less than favorable nesting/early brood-rearing conditions for sage-grouse but is generally providing adequate conditions for other wildlife. Inherently, seeded communities do not support the vegetation diversity and structure associated with native plant communities and subsequently provides reduced cover and forage resources for sage-grouse and other shrub steppe associated species. However, under Alternative 2, sage-

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, and some are severely impaired from historical use. As Field Manager for the Owyhee Field Office, 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 with 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 in 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 that 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 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.

grouse will benefit by incorporation of 100% rest one out of three years, resulting in no impacts to sage-grouse for that entire year (a total of three years of rest out of the ten-year permit). Plant vigor and health will improve and improved habitat composition and structure will follow due to the addition of rest one out of three years. Sage-grouse and other wildlife will benefit by the reduced livestock activity and the increased availability of cover and forage for escape and hiding.

Pasture 2: The native plant community is not providing adequate upland and sage-grouse habitat conditions. Under Alternative 2, current conditions in Pasture 2 will benefit by the incorporation of two out of three years of repeated rest into the grazing schedule, resulting in no impacts to sage-grouse and other shrub steppe associated species for seven years out of the ten-year permit. This will substantially modify the spring grazing cycle and will allow for improved plant vigor and health and habitat composition and structure. Sage-grouse will also benefit because of the increased abundance of security and hiding cover during the nesting/early brood-rearing periods (April 1–June 30) and late brood-rearing (July 1–August 31) that will reduce detection and predation by terrestrial and avian predators.

Currently the allotment is providing adequate riparian habitat conditions. Under Alternative 2, current conditions will be maintained and will further benefit by the incorporation of rest one out of three years in Pasture 1, and two out of three years in Pasture 2. Terrestrial and aquatic wildlife will benefit by the increase in cover and forage resulting from reduced livestock utilization and access to riparian and aquatic habitats.

Because of the deferment schedule under Alternative 2, upland and sage-grouse habitat conditions will improve and the allotment should meet, or make significant progress toward meeting Standard 8 and ORMP objectives. Riparian function and aquatic habitat conditions will also be maintained and further benefit by Alternative 2 and will continue to meet (for riparian) Standard 8 and ORMP objectives.¹⁰

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

Pasture 1 does not have any perennial streams. The allotment is meeting the standards associated with the riparian-wetland resources under current management. In Pasture 2, Alternative 2 will result in seven out of ten years rest from livestock grazing. This will provide an increase in cover, vigor, and plant composition/structure which will result in less erosion, sediment loading, bank trampling, and overall improve riparian areas. Therefore, the allotment will continue to meet the riparian-wetland standards under this alternative.¹¹

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.

¹⁰ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.2.5 and 3.3.9.2.2.4.

¹¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.2.3 and 3.3.9.2.2.3.

AND

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.

Under Alternative 2, rest is incorporated into the grazing schedule (one in three years for Pasture 1 and two in three years for Pasture 2), unlike repeated spring and summer grazing in Alternative 1. This will allow upland vegetation to complete its growth cycle, restore carbohydrate reserves, and increase vigor.

Although any grazing has the potential to introduce and spread invasive weeds and non-native annual grasses, the implementation of Alternative 2 will result in improved watershed function and plant vigor. As compared to Alternative 1, the risk of invasive species spreading is lower under Alternative 2 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 2, 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.

Rest associated with Alternative 2 will reduce physical impacts during the wettest period (during the spring) and also provide opportunity to increase soil stability due to the ability of native plant communities to remain healthy, vigorous, and productive during active growth. Vegetation and soil resources not meeting ORMP vegetation management objectives will improve unsatisfactory or maintain satisfactory soil/vegetation health and condition.¹²

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 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 2 for the Glass Creek Allotment in large part because the selection accomplishes those latter goals, while maintaining the current level of AUMs. Over the long term, your grazing operation relies upon

¹² For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Sections 3.2.1, 3.2.2, 3.3.9.2.2.1, and 3.3.9.2.2.2.

maintenance of the natural resources, including productive and healthy rangelands capable of supplying a reliable forage base.

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.¹³

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 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 2 for the Glass Creek 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. 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 may 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.¹⁴

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,

¹³ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.2.9.3.

¹⁴ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3.

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 selecting Alternative 2 for the Glass Creek Allotment. Climate change is a stressor that can reduce the long-term competitive advantage of native perennial plant species. Since livestock management practices can also stress sensitive perennial species in arid sagebrush steppe environments, I considered the issues together—albeit based on the limited information available on how they relate in actual range conditions. Although the factors that contribute to climate change are complex, long-term, and not fully understood, the opportunity to provide resistance and resilience within native perennial vegetation communities from livestock grazing induced impacts is within the scope of this decision. Alternative 2 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

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, 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 allotments. In selecting Alternative 2 for the Glass Creek Allotment rather than Alternatives 1, 4, or 5, I especially considered (1) BLM's ability to meet resource objectives using the selected alternative, (2) the impact of implementation of Alternative 5 on 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, that concluded that the proposed decision to implement Alternative 2 is not a major federal action that will have a significant effect on the quality of the human environment, individually or cumulatively with other actions in the general area. That finding was based on the context and intensity of impacts organized around the ten significance criteria described at 40 CFR § 1508.27. Therefore, an environmental impact statement is not required. A copy of the FONSI for EA number DOI-BLM-ID-B030-2013-0023-EA is available on the web at:

Conclusion

In conclusion, it is my decision to select Alternative 2 over the other three 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 Glass Creek 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:

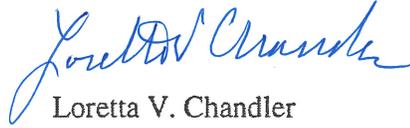
- (1) The relative harm to the parties if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

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:

- See attached Group 5 Mail List

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 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