



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

Wroten Land and Cattle Company
30314 Juniper Mtn. Rd.
Jordan Valley, OR. 97910

Notice of Field Manager's Proposed Decision

Dear Mr. Wroten:

Thank you for your application for permit renewal on the Wroten Allotment and for working with the Bureau of Land Management (BLM) during this 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 recently evaluated current grazing practices and conditions in the Wroten Allotment. We undertook this effort to ensure that any renewed grazing permit(s) on this allotment will be consistent with the BLM's legal and land management obligations. As part of our 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 engaged in public scoping and met with members of the public interested in grazing issues in the Wroten Allotment, which culminated in the Morgan Group Allotments Livestock Grazing Permit Renewal Preliminary Environmental Assessment EA # DOI-BLM-ID-B030-2013-0023-EA (hereinafter, "Morgan Group EA"). The EA evaluated the impact of livestock grazing on 19 grazing allotments within the Owyhee, Idaho BLM Field Office. The Morgan Group EA began with a scoping letter mailed to interested persons on January 11, 2013. The letter encouraged comments and information be received by February 25, 2013 for the Wroten Allotment, but did not set a closing date for the receipt of public comments in general. All comments are considered in the Morgan Group EA.

After evaluating conditions on the land, and meeting with you in April 2013 and with the public, it became clear that resource concerns currently exist on the Wroten Allotment.

In the Morgan Group EA, the BLM considered and analyzed in detail four alternatives for the Wroten 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 natural resource conditions on the Wroten 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 Morgan Group EA.

I am now prepared to issue a proposed decision to renew your permit to graze livestock. After careful consideration, I have selected Alternative 4 as a proposed decision for the Wroten Allotment. Upon implementation of the decision, your permit to graze livestock in the Wroten Allotment will be fully processed using the revisions to the grazing regulations¹ promulgated in 1995, the Idaho S&Gs, adopted in 1997, and the ORMP, adopted in 1999.

This proposed decision will:

- Describe current conditions and issues on the Wroten Allotment;
- Briefly discuss the alternative grazing management systems that the BLM considered in the Morgan Group EA;
- Respond to the applications for grazing permit renewal for use in the Wroten Allotment;
- Outline my proposed decision to select Alternative 4 in Wroten Allotment; and
- Explain my rationale for proposing Alternative 4.

Background

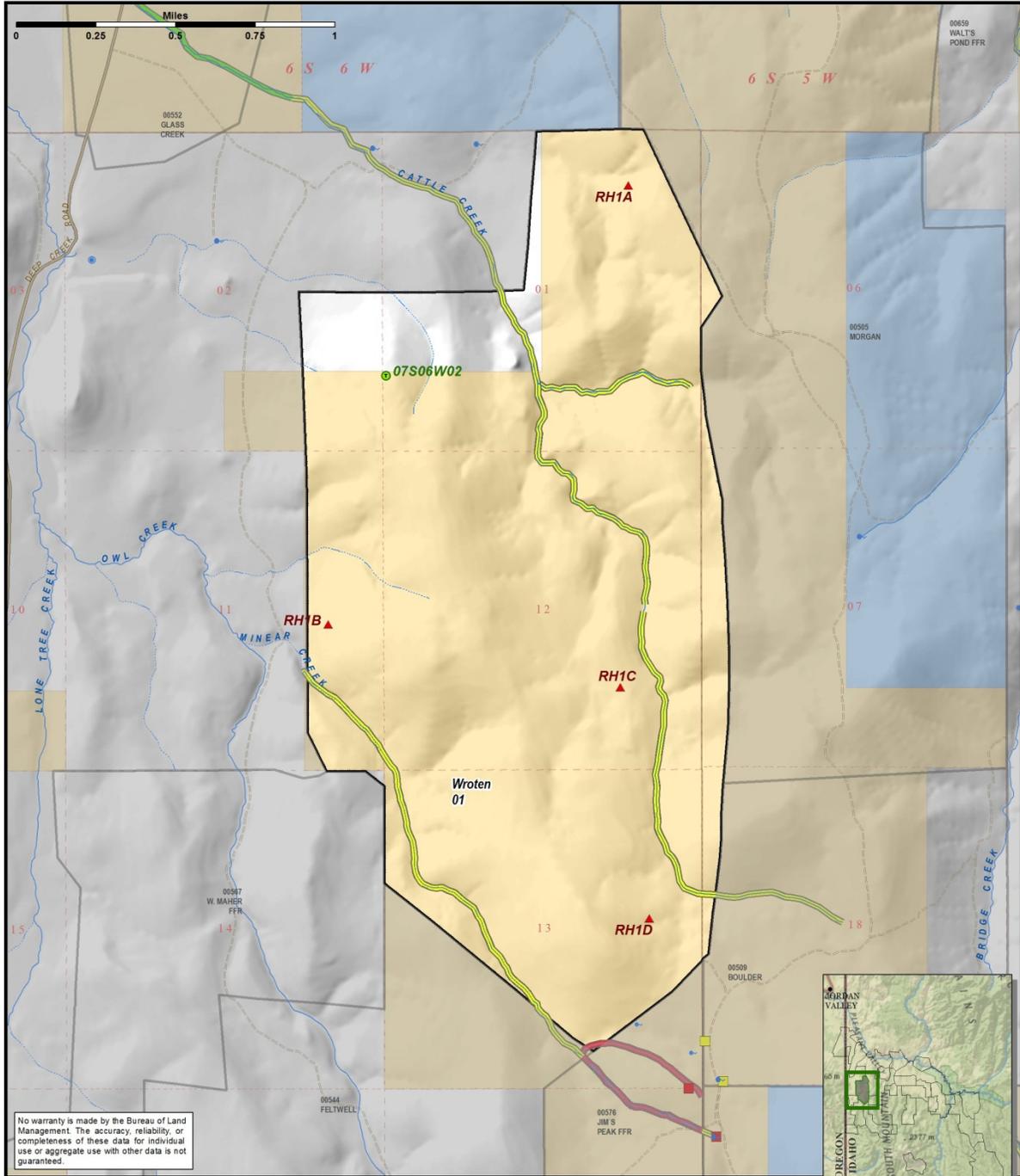
Allotment Setting

The Wroten Allotment is located in western Owyhee County, Idaho, approximately 12 miles southeast of Jordan Valley, OR (Map 1). Elevations range from approximately 4,755 feet at the northern end of the allotment to 5,747 feet on the southern portion of the allotment. This one-pasture allotment is primarily grazed May through August annually. Of the approximately 1,845 acres comprising the allotment, the Bureau of Land Management (BLM) administers 1,710 acres and 135 acres of private land. See Map 1. In the 1999 ORMP, the Wroten Allotment was placed in the “Improve with low priority Selective Management” (Improve) Category. The objective of the Improve Category of allotments is to manage the public lands with adequate expenditure of funding and manpower to improve current unsatisfactory resource conditions. They must also meet or make progress toward meeting the Idaho S&Gs.

¹ 43 CFR Subpart 4100 is the federal regulations that govern public land grazing administration.



Map 1: Wroten (00597) 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 | Intermittent Stream | BLM |
| Monitoring | Trough | FAR | Improved Road | State |
| Nested Plot Frequency Trend | Exclosure | NF | Primitive Road | Private |
| RHA Point | | | | |



1:25,000

Current Grazing Authorization

You currently graze livestock on the Wroten Allotment pursuant to a grazing permit issued by the BLM Table LIV-1.0. The terms and conditions of that grazing permit are as follows:

Table LIV-1.0: Wroten Land & Cattle Company

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00597 Wroten	135	Cattle	4/1	11/29	100	Active	400
<p>Other terms and conditions:</p> <ol style="list-style-type: none"> 1. Grazing use will be in accordance with the grazing schedule identified in your existing grazing decision. 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 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. 							

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

- Key herbaceous riparian vegetation, where stream bank 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 stream banks, will not be grazed more than 50 percent during the growing season, or 60 percent during the dormant season; and
- Stream bank damage attributable to grazing livestock will be less than 10 percent on a stream segment.

The current permit authorizes annual use as shown in Table LIV-1.1, below. Based on management actions over the last ten years, you have made use of the flexibility authorized in the grazing permit and utilized the allotment with different livestock numbers and seasons compared to the numbers and dates specified in the Mandatory Terms and Conditions. The result of this management is reflected in the average actual use.

Table LIV-1.1: Average Actual use as compared to Active Use AUMs

Allotment Name	Baseline Active AUMs	Average Actual Use	Percent Difference Active vs. Average Actual Use AUMs
Wroten	400	398	-1%

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

Guidelines for Livestock Grazing Management

The BLM’s 2013 Determination for the Wroten 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 Table LIV 1.2:

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 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 plants, 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.

Table LIV 1.2. Standards and Guidelines that are not being met under current BLM grazing management

Allotment	Standards Met	Standards Not Met, But Making Significant Progress	Standards Not Being Met	Standards Not Being Met and Current Livestock Grazing Significant Causal Factor	Standards Not Applicable	Guidelines
Wroten	1,4	None	None	2, 3, 7, 8	5, 6	5, 7, 8, 10, 11, 12

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

Resource Conditions

The BLM completed an updated land health assessment, evaluation and determination for the Wroten Allotment in 2013. That document concluded that some of the resources on these allotments were not meeting the Idaho S&Gs.

The Wroten Allotment is used as a 1 pasture system. Standards 2, 3, 7, and 8 of the applicable Standards for Rangeland Health are not being met in the Wroten allotment, Standards 1 and 4 are being met. Standards 5 and 6 are not applicable to resources present within the allotment. Current livestock grazing management practices are significant factors in not meeting Standards 2, 3, 7 and 8. Livestock management practices do not conform to the applicable Livestock Grazing Management Guidelines 5, 7, 8, 10, 11, and 12.

Soils-uplands²

Watershed indicators show some departure from expected conditions for the ecological sites, though none were excessive enough to determine that Standard 1 would not be met in the Wroten allotment. Erosion relics are present but are primarily related to past grazing management as gravel, vegetative cover, biological soil crusts, and plant litter stabilize the soil surface.

² For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.1

The ORMP management objective to improve unsatisfactory and maintain satisfactory watershed health/condition is also met, as indicators of bare ground, persistent cover, and canopy cover indicate a generally improving ground cover trend that has been maintained. Biotic conditions reflect continued productivity and diversity of native plant species. Despite the continued presence of deep-rooted bunchgrasses, however, an increase in invasive annuals and shallow-rooted bunchgrasses is occurring so that the allotment is considered to be at risk.

An upward trend in ground cover, good representation of deep-rooted native bunchgrasses, and little departure from watershed reference conditions indicate that watershed function is maintained with proper nutrient and hydrologic cycling and energy flow. Although the allotment is at risk for invasive annuals, current livestock management remains compatible with attainment of Standard 1 and ORMP objectives for the Wroten allotment.

Vegetation-uplands³

Rangeland Health Standard 4 is being met in the Wroten allotment. Although annual invasives are increasing on the site, posing a risk of 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 on the allotment.

Qualitative rangeland health assessment (RHA) data indicate that Standard 4 is met with only moderate departure of annual invasive plants. This conclusion supports the finding that the allotment is meeting the Standard.

Overall interpretations of trend data suggest that grass frequencies are primarily static and biotic conditions are maintained with co-dominant shallow rooted bunchgrasses from historic livestock grazing; however, while bluebunch wheatgrass remains static at 43 percent occurrence on the trend site, Idaho fescue is increasing significantly.

The ORMP management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas is also met. Static and short-term upward trend recorded in the vegetation communities lead to a conclusion that the vegetation management objective is being met.

Water Resources and Riparian/Wetland Areas⁴

The Wroten allotment is not meeting Standards 2 and 3 due to current livestock grazing management. There are approximately 2.5 miles of perennial streams and 1.9 miles of intermittent streams on BLM lands within the allotment, and three main drainages occur within the single pasture: Cattle Creek, a tributary to Cattle Creek, and Minear Creek. Segments of these streams were rated functioning-at-risk (FAR), and the issues and impacts identified are livestock caused. There was inadequate vegetation and woody material present to protect stream banks, the point bars were not re-vegetating, and the plants present had low vigor. Also, on the tributary to Cattle Creek, there was a headcut present that caused vertical instability, and the channel was incised.

³ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.1

⁴ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.3

Subsequent to the assessments, two Multiple Indicator Management (MIM) sites were established and the short-term metrics collected indicate that Standards are not being met. For the site established on the upper reach of Cattle Creek, the mean stubble height was 3.4 inches, there were not sufficient woody plants to measure, and the stream bank alteration was 38 percent. On Minear Creek, the mean stubble height was 4.4 inches, woody use was 20 percent, and the stream bank alteration was 44 percent. The lack of residual vegetation and the amount of direct impacts to the stream banks do not allow adequate protection during high flows and reduce the form and therefore the function of the riparian-wetland areas.

According to recent IDEQ information (IDEQ, 2009), Standard 7 is not being met in the Wroten allotment based on the presence of E. Coli in Cattle and Minear Creeks that is attributable to current livestock grazing.

Special Status Plants⁵

No special status plants are known to occur on the Wroten Allotment; therefore this will not be discussed further for this allotment.

Wildlife/Wildlife Habitats and Special Status Animals⁶

Upland Habitat

The Wroten allotment is managed as a native plant community and is meeting Standard 4 by providing for proper nutrient cycling, hydrologic cycling, and energy flow. Evaluation for Standard 4 noted a dominance of Sandberg bluegrass and an increase in annual invasive grass species, although bluebunch wheatgrass and Idaho fescue are near reference site conditions.

This information is inconsistent with vegetation data collected by sage-grouse assessments in 2012 that showed an absence of large perennial grasses. Optimally, the vegetation data would support one another, however, variability in data results can occur due to difference in data collection locations (e.g., shallow claypan sites vs. loamy sites) and monitoring purposes (i.e. nutrient cycling, hydrologic cycling, and energy flow vs. habitat composition and structure), which can show the variability of site conditions in the allotment. Because of the less-than-desirable breeding habitat conditions created by the sagebrush understory, this allotment is providing less-than-adequate (marginal) nesting and early brood-rearing habitat conditions for sage-grouse and therefore is not meeting Standard 8 due to historic (past) grazing management and the presence of invasive annual vegetation.

Riparian Habitat

Evaluation under Standards 2, 3, and 7 identified streams and springs within this allotment that are not properly functioning or meeting water quality parameters due to historic and current grazing practices, and therefore do not meet Standard 8. Streams, springs, and wetlands that are functioning-at-risk are lacking adequate herbaceous and woody vegetation and riparian habitat composition and distribution to provide the structure and function to support a productive riparian environment. Because Standards 2, 3, and 7 are not being met (see Water Resources and

⁵ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.1.4

⁶ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.4

Riparian/Wetland Areas Section), this allotment is failing to provide adequate riparian habitat conditions to support viable aquatic and terrestrial species populations and therefore is not meeting Standard 8 due to historic and current grazing practices.

Focal Species

Sage-grouse

The Wroten allotment lies entirely within modeled Preliminary Priority Habitat (PPH) for sage-grouse (1,845 acres of PPH sagebrush habitat⁷). No active leks are known to occur within this allotment; however leks are recorded within adjacent allotments. This allotment provides seasonal breeding, summer upland, riparian, and winter habitat for sage-grouse.

Both sage-grouse breeding and summer upland habitat conditions at two locations were found to be unsuitable. The habitat assessments recorded unsuitable habitat due to a substantial absence of large perennial grasses on the loamy sites. Because the occurrence and distribution of perennial grasses are absent in the understory which is critical for nesting and hiding structure, this allotment is not meeting Standard 8 due to historic grazing practices.

This finding is inconsistent with the determination for Standard 4 which indicates this allotment is providing adequate nutrient cycling, hydrologic cycling, and energy flow. Optimally, the vegetation data would support one another, however, variability in data results can occur due to differences in data collection locations (e.g., shallow claypan sites vs. loamy sites) and monitoring purposes (i.e. nutrient cycling, hydrologic cycling, and energy flow vs. habitat composition and structure). However, considering the importance of adequate habitat composition and structure required by sage-grouse and the absence of large perennial grasses in the understory shown by the sage-grouse habitat assessments; the information shows that habitat conditions are not being provided for breeding/early brood-rearing and late brood-rearing sage-grouse.

Columbia Redband Trout and Columbia Spotted Frog

Habitat for the Columbia redband trout and the Columbia spotted frog is not documented to occur within this allotment.

Issues⁸

Throughout the internal and external (public) scoping process and project development period, the BLM interdisciplinary team identified the following issues concerning livestock grazing management in one or more of the Allotments analyzed in the Morgan Group EA:

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 Wroten Allotment contain altered sagebrush community composition, structure, and function that are affecting sage-grouse and other sagebrush habitat-dependent species.
2. **Riparian vegetation conditions:** Livestock grazing is affecting riparian condition and aquatic habitat by changing the health and composition of riparian vegetation communities.

⁷ PPH habitat acreage totals include public lands, state lands, and private property.

⁸ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 1.6.3

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.
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.
5. Special Status Plant Species: Livestock grazing may adversely affect special status plants by altering surrounding upland vegetation, habitat and reproduction of individuals. While pertinent in some allotments analyzed in the Morgan Group EA, there are no known instances of Special Status Plants on public lands in the Wroten allotment.
6. Noxious and invasive weeds: Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.
7. Livestock trailing: Trailing may adversely affect upland vegetation, soils, weeds and riparian vegetation.
8. Socioeconomic impacts: Livestock grazing affects local and regional socioeconomic activities generated by livestock production.
9. Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire.
10. 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

The range of alternatives developed include: Alternative 1 - No Action/Current Condition, Alternative 2 - Permittee's Application, Alternative 5 - No Grazing, as well as Alternatives 3 and 4, which were developed based on resource constraints. These alternatives were developed in response to current conditions on the Wroten Allotment and the issues identified above to ensure that any renewed grazing permit would result in maintaining good conditions and improving unsatisfactory conditions on the allotments. Overall, five alternatives were considered and analyzed in the Morgan Group EA, with Alternatives 1, 2, 3, 4, and 5 considered in detail and analyzed for the Wroten Allotment.

The Preliminary Morgan Group EA detailing these alternatives was made available for public review and comment for a 15-day period ending November 12, 2013. In addition to timely comments received from you, a number of government entities and agencies, interest groups, and members of the public also provided comments.

Proposed Decision

After considering the current grazing practices, the current conditions of the natural resources, and the alternatives and analysis in the Morgan Group EA, as well as other information, it is my

proposed decision to renew your grazing permit for ten years with modified terms and conditions consistent with the following:

Wroten Allotment - Alternative 4 as described in Morgan Group EA number DOI-BLM-ID-B030-2013-0023-EA.

Implementation of this alternative, over the next 10 years will allow the Wroten Allotment to meet or make significant progress toward meeting the Idaho S&Gs while also moving toward achieving the resource objectives outlined in the ORMP.

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

Table PROP 1.0. Wroten Land & Cattle Co. Mandatory Terms and Conditions

Allotment	Livestock		Grazing Period		% PL ⁹	Type Use	AUMs
	Number	Kind	Begin	End			
00544 Wroten	131	Cattle	4/15	1/29	100	Active	398
<p>Other terms and conditions:</p> <ol style="list-style-type: none"> 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. Turn-out is subject to the Boise District range readiness criteria. The permittee's certified actual use report is due within 15 days of completing the authorized annual grazing use. 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. 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. 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. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use. 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. 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. 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. 							

⁹ PL (Public Land) is based on percentage of BLM lands in the Allotment.

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| <p>11. Utilization may not exceed 50 percent of the current year's growth.</p> <p>12. With prior approval from the authorized officer, cattle numbers may vary up to 131 head as long as the grazing schedule is followed and the total 398 active AUMs are not exceeded annually.</p> |
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Livestock Management

Alternative 4 actions, mandatory and other terms and conditions of the offered permit for grazing use in the Wroten allotment schedule would be defined as listed in Table PROP-1.1.

Table PROP-1.1: Alternative 4 grazing schedule for the Wroten allotment

Pasture	Year 1	Year 2	Year 3
Pasture 1	4/15-9/4	10/1-1/29	Rest

Notes on the Terms and Conditions

Wroten Land and Cattle Company will be offered a grazing permit(s) for a term of 10 years for the Wroten Allotment. Adoption of Alternative 4 will result in a reduction in AUMs from your current permit; however, the affected 2 active use AUMs will not be transferred to suspension, in conformance with regulatory direction at 43 CFR § 4110.3-2. Permitted use within the Wroten allotment will be as follows (Table PROP-1.2):

Table PROP 1.2: Permitted Use

Allotment	Active Use	Suspension	Permitted Use
Wroten	398 AUMs	0 AUMs	398 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 Wroten Land and Cattle Company records as a grazing permit holder for the Wroten Allotment and have determined that you have a satisfactory record of performance and are qualified applicants for the purposes of a permit renewal.

Justification for the Proposed Decision

Based on my review of Morgan Group EA number DOI-BLM-ID-B030-2013-0023-EA, the rangeland health assessment/evaluation, determinations and other documents in the project record, it is my proposed decision to select Alternative 4 for the Wroten Allotment. I have made this selection for a variety of reasons, but most importantly because of my understanding that implementation of this decision will best fulfill the BLM's obligation to manage the public lands under the Federal Land Policy and Management Act's multiple use and sustained yield mandate, and will result in the Wroten Allotment meeting or 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 Wroten Allotment. I want you to know that I focused my attention on the allotment-specific issues as I weighed each alternative and made my decision. My selection of Alternative 4 for the Wroten Allotment was in large part because of my understanding that this selection best addressed the specific issues, given the BLM's legal and land management obligations. I spent hours with members of my staff and the NEPA Permit Renewal Team to discuss pros and cons for each alternative. Ultimately, I had to choose the alternative that best protects the resource while considering your livestock operation, current resource conditions, and expectations from you as the permittee, and the BLM as the responsible office.¹⁰

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

AND

¹⁰ Your allotment is, as you know, a member of one group of six groups of allotments forming the Owyhee 68 Allotments, which are the subject of a permit renewal process to be completed by December 31, 2013. The NEPA process for the Owyhee 68 consists of 5-plus EAs and the EIS which supports this particular set of decisions. This multiple-allotment process has required me, as the Field Manager responsible for signing these grazing decisions, to look at these allotments, and the other allotments analyzed in the EAs and the EIS, not just individually but as a members of a group of allotments located in a particular landscape, the BLM Owyhee Field Office. That is, I am looking not just at your individual allotment, reviewing its RHA/Evaluation/Determination, selecting an alternative that will best address this allotment's ecological conditions and BLM's legal responsibilities (for the purposes of this decision), but looking at this allotment from a landscape perspective. Viewed this way, it is clear that there are problems common to the Owyhee 68 allotments.

Of the approximately 60 allotments which have riparian areas, at least 47 are not meeting IS&Gs for riparian/water issues due to current livestock management; of approximately 73 allotments, 43 are not meeting the ISG for upland vegetation ; in many cases, performance under Standard 8 tracks these results. In spite of the efforts of BLM and the ranching operators, resource conditions are not good. Some of these allotments have seen spring use year after year; some have had summer-long riparian use every year. As Field Manager for the Owyhee, I have a steward's responsibility to further the health and resilience of this landscape.

Adding to these considerations, we live in a time of uncertainty. Climate change presents an uncertainty whose impacts we cannot clearly discern, but as land stewards must factor into our decisions a consideration of how best to promote resiliency on the landscape. Add to this the uncertainty associated with the BLM's organizational capacity to manage this landscape: in a time of budget cutting, staff reductions and reduced revenues, land management decisions must factor in considerations of the level of on-the-ground management we can reasonably expect to accomplish.

These compelling factors drive us to develop grazing management on individual allotments that combines the greatest assurance of ecological resilience with the most likely anticipation of organizational ability, and 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 if monitoring is required to make progress under a particular alternative (for example), and is not performed, the result may be decreasing ecological health for the allotment and, at the time of the next permit renewal, decreased grazing opportunity from public land for the operator. My responsibility and challenge here is to make decisions that lead to success which includes healthy, sustainable resource conditions and predictability for ranching operators.

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 function¹¹.

The sage-grouse is an indicator species for the sagebrush ecosystem, thus the attributes of suitable sage-grouse habitat provide an effective barometer for health of the sagebrush ecosystems that dominate the Wroten Allotment. Sage-grouse habitat quality is inseparable from the vegetation community conditions discussed in Standard 4 (Native Plant Communities). Therefore, the following is a combined rationale for my alternative selection as it relates to the issues of sage-grouse habitat and upland vegetation and watershed conditions.

While Rangeland Health Standards 1 and 4 are being met in the Wroten allotment, implementation of Alternative 4 provides the opportunity to improve current conditions of the Wroten allotment. Wroten allotment would continue to meet Standard 1 and 4 and ORMP objectives.

Alternative 4 prescribes a three-year grazing system with a maximum of 131 head of cattle and 398 AUMs. The system rotates April through September grazing one in three years, October through January grazing one in three years, and rest one in three years. Increased years of rest or deferment and reduction of 30 percent AUMs in a ten-year permit as compared to Alternative 1, 2 and 3 in the Wroten allotment would allow opportunity to improve vegetation communities currently meeting vegetation Standards and ORMP objectives for vegetation health. Vegetation resources meeting ORMP vegetation management the Wroten allotment would have the opportunity to improve or maintain satisfactory vegetation health and condition as compared to Alternatives 1, 2 and 3.

Alternative 4 provides 2 out of 3 years of deferment and rest from spring grazing to reduce physical impacts to soils during the times when soils are at their wettest and are most susceptible to damage. Additional benefits are provided from 2 out of 3 years of deferment and rest from critical growing season use and summer riparian grazing. Native plant communities have the opportunity to improve and respond with increased soil cover, decreased bare ground, and less susceptibility to accelerated erosion from reduced concentrated summer use on upland soils that surround riparian areas. Consequently, reduced spring and critical-growth-period grazing would result in a reduction of livestock numbers and a slight decrease in active AUMs that would benefit soils by limiting physical impacts from hoof action. Although the allotment is meeting Standard 1 and ORMP objectives, Alternative 4 would allow the greatest opportunity for making progress toward maintaining; meeting and improving soil and hydrologic function over the life of the permit compared to the current situation and Alternatives 2 and 3, though not as rapid as Alternative 5.

Currently this allotment is not providing adequate sage-grouse habitat conditions. Under Alternative 4, sage-grouse habitat conditions would benefit by the 30 percent reduction in AUMs accomplished through the incorporation of grazing deferment/rest 2 out of 3 years out of the critical growth period (May 1 through June 30), sage-grouse nesting/early brood-rearing period

¹¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.2.4.1, 3.3.8.2.4.2, 3.3.8.2.4.4

(April 1 through June 30), and late brood-rearing period. This management would improve plant vigor and health and improve habitat composition and structure. Sage-grouse would benefit by the increased security and escape cover available during the nesting/early brood-rearing period and the decreased vulnerability of detection and predation by terrestrial and avian predators.

Overall, under Alternative 4, current sage-grouse habitat conditions would show improvement. Habitat conditions would substantially improve as plant vigor and health improves along with composition and structure. Sage-grouse will benefit by the increased security and escape cover available during the nesting/early brood-rearing period and late brood-rearing period. Terrestrial, avian, and aquatic wildlife would benefit because of improved regeneration and establishment of herbaceous and woody plants and improved riparian function. Reduced access of livestock to streams, wetlands, and springs will reduce trampling in aquatic systems. Under this Alternative, current sage-grouse upland and riparian habitat conditions would improve and make significant progress toward meeting Standard 8 and ORMP objectives.

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 populations¹².

Under Alternative 4, the Wroten allotment would be available for grazing during the spring and summer for one year, during the fall and winter the second year, and rested the third year of a three year schedule. Consequently, within the allotment, 3.8 miles of perennial, and 2.7 miles of intermittent stream would be affected by the impacts associated with those seasons of grazing. Recent actual use reported indicates that the allotment has been primarily used during the spring, summer, and fall, annually.

The Wroten allotment is not meeting the standards associated with the riparian-wetland resources associated wildlife habitat conditions under current management. Under Alternative 4, the allotment would be managed on a defined three year schedule that incorporates one year of riparian growing season (July 1 through Sept. 30) deferment as well as one year of rest. Thus, the impacts associated with grazing during the summer would be eliminated those two years. Riparian function (i.e. bank stabilization, sediment filtering, and flow regulation) would improve because of the regeneration and establishment of herbaceous and woody plants. Terrestrial, avian, and aquatic wildlife will benefit because of the reduced access of livestock to aquatic habitats as well as because of the improved habitat composition and structure and the additional cover and forage provided. Therefore, the allotment would meet the riparian-wetland function and habitat Standards 2, 3, and 8 and attain the ORMP objectives under this alternative.

¹² For more detailed discussion, please refer to EIS number DOI-BLM-ID-B030-2012-0014-EIS Section 3.3.8.2.4.3, 3.3.8.2.4.4

Issue 5: Special Status Plant Species: Livestock grazing is adversely affecting special status plants by altering surrounding upland vegetation, habitat and reproduction of individuals.

No special status plant species are known to exist on the public lands in this allotment.

Issue 6: Noxious and invasive weeds: Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.

No noxious and invasive weeds designated by the State of Idaho are known exist on public land on the Wroten Allotment. Acknowledging that any grazing has the potential to introduce and spread invasive weeds and non-native annual grasses, a reduction in active use and deferment or rest in the alternative selected will result in proportionally less soil surface disturbance and fewer animals to carry seed to, from and within the allotment in fur, on hooves, and in their digestive system. As compared to Alternatives 1, 2 and 3, the risk of invasive species spreading is lower under Alternative 4 as native perennial species plant health and vigor is improved and progress is made toward the ORMP vegetation management objective. Alternatives 4 will promote native perennial species and therefore reduce the competition of invasive species establishment.

Issue 7: Livestock trailing: Trailing may adversely affect upland vegetation, soils, weeds and riparian vegetation.

Because no trailing activities are known to occur on public land in the Wroten Allotment, Issue 7 is not applicable.

Issue 8: Socioeconomic impacts: Livestock grazing affects local and regional socioeconomic activities generated by livestock production.

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 will 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. We worked hard to develop a socio-economic analysis that would, as accurately as possible, provide the best information about socio-economic impacts expected from the different alternatives, and I have utilized this information in making my proposed decision.

Issue 9: Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire.¹³

¹³ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3 Alternatives considered and dismissed.

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 will be theoretically possible to use targeted grazing to create fuel breaks on these allotments with the hope that those fuel breaks will 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 4 for the Wroten Allotment will not significantly alter the BLM's ability to fight wildfire in the area.

Although a number of sources identify the potential to use grazing to reduce fine fuels on a landscape scale, identified benefits are greatest with targeted grazing that strategically maintains fuel-breaks to aid fire suppression actions. Landscape-scale fuels reduction with livestock grazing has its greatest application in grass-dominated vegetation types and specifically within seedings of grazing tolerant introduced grasses and annual grasses. Such conditions do not exist on these allotments at a pasture-wide scale. In addition, the levels of livestock grazing and the season of yearly use necessary to reduce fine fuels prior to the fire season are not conducive to sustaining native perennial herbaceous species. This is one of the main reasons a targeted grazing system to control fire is not viable on these allotments at this time. The BLM's current permit renewal is focused on improving native upland and riparian plant communities on these allotments, and targeted grazing to create fuel breaks will 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.¹⁴

Issue 10: Climate Change: Livestock grazing is inter-related to the effects of annual grass invasion and wildfire frequency which are expected to worsen as a result of climate change.

Climate change is another factor I considered in building my decision around Alternative 4 for the Wroten 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 alternatives 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 these allotments will be better armed to survive such changes as a result of this alternative's year of rest and deferment. The native plant health and vigor protected under this alternative will provide resistance and resilience to additional stressors, including climate change.

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

Additional Rationale

I did consider selecting Alternative 5 (No Grazing) 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 4 for the Wroten Allotment rather than Alternative 5, I especially considered (1) BLM's ability to meet resource objectives using the selected alternative, (2) the impact of implementation of Alternative 5 on your operation and on regional economic activity, and (3) your past performance under previous permit. The resource issues identified are primarily related to the improper seasons and site-specific intensities of grazing use. By implementing this alternative, the resource issues identified will be addressed. The suspension of grazing for a ten-year period is not the management decision most appropriate at this time in light of these factors.¹⁵

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 4 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:

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 4 for the Wroten Allotment because livestock management practices under this alternative best met the ORMP objectives allotment-wide and the Idaho S&Gs. Alternatives 1 and 2 fail to implement livestock management practices on the Wroten Allotment that would meet the objectives and standards. Specifically, both alternatives fail to implement actions that would meet Standards 2 (Riparian Areas and Wetlands), 3 (Stream Channel/Floodplain), 7 (Water Quality), and Standard 8 (Threatened and Endangered Animals). Alternative 3 only minimally will show progress. Alternative 5 has the potential to remove

¹⁵ A tremendous amount of thought and effort went into developing grazing management systems that are responsive to your allotment specific resource needs, geography, and size. We attempted to address all resource and operational concerns and the resource and stewardship requirements mandated to the BLM. We recognize that 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 informed by the interested public with these features in mind. I recognize the difficulty of not only responding to BLM's (mandated) needs to protect the resources, but recognize as well the needs and capability that you, the permittees, have. I believe I have balanced those needs of the resource and your capabilities with the information I have to the extent possible.

significant economic activity from Owyhee County and southwest Idaho, a region where livestock production and agriculture is a large portion of the economy. That, in conjunction with current resource conditions and the improvement anticipated by implementation of the alternatives leads me to believe elimination of livestock grazing from the Wroten Allotment is unnecessary at this point.

Authority

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

- 4100.0-8 Land use plans; The ORMP designates the Wroten 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 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
Field Manager
Owyhee Field Office

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

Company	Name		Address	City	ST	ZIP	#
R&S Enterprise	Ray	Mitchell	265 Millard Rd.	Shoshone	ID	83352	28
	Brett	Nelson	9127 W. Preece St.	Boise	ID	83704	29
	Ramona	Pascoe	PO Box 126	Jordan Valley	OR	97910	30
	Anthony & Brenda	Richards	8935 Whiskey Mtn. Rd.	Murphy	ID	83650	31
	Senator: James E.	Risch	350 N 9th Street STE 302	Boise	ID	83702	32
Idaho Conservation League	John	Robison	PO Box 844	Boise	ID	83701	33
	John	Romero	17000 2X Ranch Rd.	Murphy	ID	83650	34
	Bob	Salter	6109 N. River Glenn	Garden City	ID	83714	35
Intermountain Range Consultants							36
	Bob	Schweigert	5700 Dimick Ln.	Winnemucca	NV	89445	
	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							39
	Michael	Stanford	3581 Cliffs Rd.	Jordan Valley	OR	97910	
	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

Company	Name		Address	City	ST	ZIP	#
Schroeder & Lezaniz Law Offices			PO Box 267	Boise	ID	83701	53
Sierra Club			PO Box 552	Boise	ID	83701	54
State Historic Preservation Office			210 Main St.	Boise	ID	83702	55
State of Nevada Div. of Wildlife			60 Youth Center Rd.	Elko	NV	89801	56
The Nature Conservancy			950 W. Bannock, Ste. 210	Boise	ID	83702	57
The Wilderness Society			950 W. Bannock St., Ste. 605	Boise	ID	83702-5999	58
U.S.F.W.S. Idaho State Office			1387 S. Vinnell Way, Ste. 368	Boise	ID	83709	59
USDA Farm Services			9173 W. Barnes	Boise	ID	83704	60
Western Watershed Projects			PO Box 1770	Hailey	ID	83333	61
Josephine Ranch	Steve	Boren	1050 N. Briar Lane	Bosie	ID	83712	62
Lequerica & Sons Inc.	Tim	Lequerica	PO Box 113	Arock	OR	97902	63
	Robert	Thomas	17947 Shortcut Rd.	Oreana	ID	83650	64
Idaho Fish & Game	Rick	Ward	3101 S. Powerline Rd.	Nampa	ID	83686	65
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 &	Peton	P.O. Box 998	Veneta	OR	97487	80

Company	Name		Address	City	ST	ZIP	#
	Carolyn						
Morgan Properties	David	Rutan	P.O. Box 277	Jordan Valley	OR	97910	81
06 Livestock	Dennis	Stanford	P.O. Box 167	Jordan Valley	OR	97910	82
South Moutain Grazing Coop	Terry	Warn	P.O. Box 235	Jordan Valley	OR	97910	83
	Phillip & Benjamin	Williams	1807 Danner Loop Rd	Jordan Valley	OR	97910	84
Idaho Dept. of Parks & Recreation	Director		PO Box 83720	Boise	ID	83720	85
Wrotten Land & Cattle Co			30314 Juniper Mtn. Rd	Jordan Valley	OR	97910	86
Quintana Ranch LLP	Tim	Quintana	3876 Hwy. 95	Homedale	ID	83628	87