



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
Owyhee Field Office
20 First Ave West
Marsing, ID 83639
(208) 896-5912



In Reply Refer To:
4160 ID130

January 24, 2014

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

WF and Carolyn D. Peton
PO Box 998
Veneta OR, 97487

Notice of Field Manager's Proposed Decision for the Feltwell Allotment

Dear Mr. and Mrs. Peton:

Thank you for working with the BLM during this permit renewal process. I appreciate your interest in grazing the Feltwell 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 current conditions in the Feltwell 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 the BLM's evaluation process, rangeland health assessments, evaluations, and determinations were completed. This Proposed Decision incorporates those documents by reference and the information contained therein.

The BLM also engaged in public scoping and met with members of the public interested in grazing issues in the Feltwell allotment. After evaluating conditions on the land and meeting with you and the public, it became clear that resource concerns currently exist on the Feltwell allotment. To assist us in addressing livestock impacts to public land resources, my office prepared and issued the Morgan Group Allotments Livestock Grazing Permit Renewal Preliminary Environmental Assessment EA # DOI-BLM-ID-B030-2013-0023-EA (Hereinafter, Morgan Group EA). The process for completing the Morgan Group EA began with a scoping letter on January 11, 2013. The letter solicited comments and information from the public to be received by February 25, 2013, for the Feltwell allotment. Any comments received were addressed in the Morgan Group EA, including BLM Responses to Comments considered during development of the EA. In addition to the scoping period identified above, my staff and members from the NEPA Permit Renewal Team met with the lessee as requested in April 2013 to discuss your grazing permit renewal application received on June 14, 2011, current allotment conditions, and share information about your livestock operations within this allotment. During this meeting, we discussed our preliminary conclusions regarding rangeland health standards and guidelines and made grazing management recommendations associated with your grazing permit renewal application, which you updated at that time. After evaluating conditions on the land and meeting with you and the public, it became clear that resource concerns currently exist on the allotment.

In the Morgan Group EA, the BLM considered a number of options and approaches to maintain and improve resource conditions. Specifically, the BLM considered and analyzed in detail five alternatives for the Feltwell 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 Feltwell allotment are 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. The Final Morgan Group EA incorporates by reference the Jump Creek, Succor Creek, and Cow Creek Watersheds Grazing Permit Renewal Final EIS # DOI-BLM-ID-B030-2012-0014-EIS and the analysis contained therein (see Appendix J).

I am now prepared to issue a Proposed Decision to renew your permit to graze livestock within the Feltwell allotment. After careful consideration, I have selected Alternative 4 as a Proposed Decision for the Feltwell allotment. This decision is the culmination of a comprehensive review of the relationship between resource conditions and livestock grazing practices on the Feltwell 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 Feltwell allotment;
- Briefly discuss the alternative grazing management systems that the BLM considered in the Morgan Group EA;
- Respond to your application for grazing permit renewal for use in the Feltwell allotment;
- Outline my Proposed Decision to select Alternative 4 in the Feltwell allotment; and
- Explain my rationale for proposing Alternative 4.

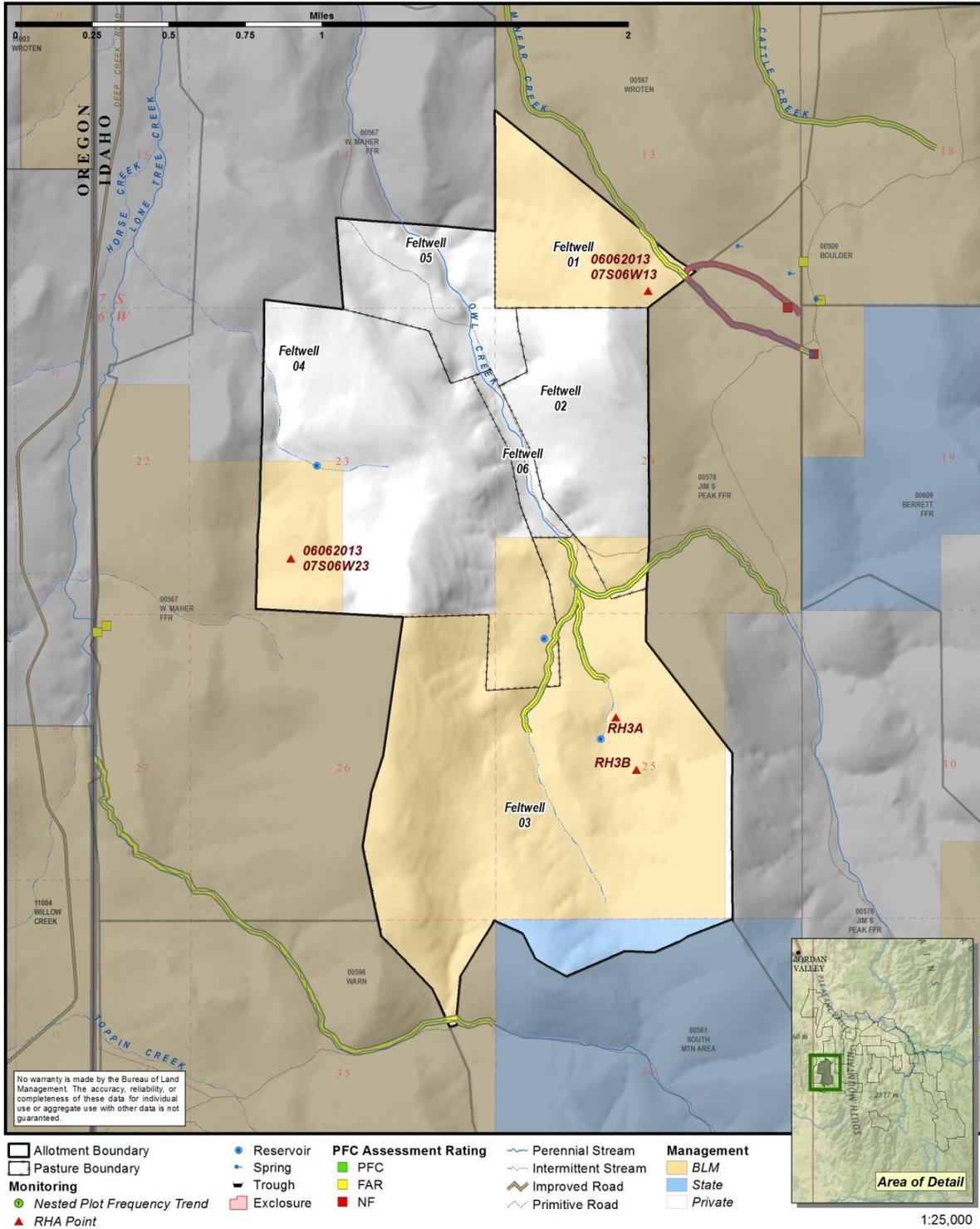
Background

Allotment Setting

The Feltwell allotment is located in western Owyhee County, Idaho, approximately 12 miles southeast of Jordan Valley, OR (Map 1). The allotment lies in a sagebrush shrub steppe vegetation community type in the western foothills of the Owyhee Mountains. Elevations range from approximately 4,941 feet at the northern end of the allotment to 6,162 feet on the southernmost boundary of the allotment. This six-pasture allotment is primarily grazed May through August annually. The BLM manages 63 percent (1,033 acres) of the approximately 1,820 acres within the allotment; there are also 47 acres of state land and 740 acres of private land. See Map 1. In the ORMP, the Feltwell allotment was placed in the Maintain Selective Management (M) category. *Maintain* allotments are managed with minimal expenditure of appropriated funds and are maintained for current satisfactory resource conditions. They must also meet or make progress toward meeting the Idaho Standards for Rangeland Health. The ORMP identified 279 AUMs of active preference for livestock grazing in the Feltwell allotment.



Map 1: Feltwell (00544) Allotment



Current Grazing Authorization

You currently graze livestock on the Feltwell allotment pursuant to a grazing permit issued by the BLM. The terms and conditions of that grazing permit are as follows:

Table LVST-1: Current Grazing Permitted for the Felwell allotment and WF & Carolyn D. Peton

Allotment	Livestock		Grazing Period		% PL	Type Use	AUMs
	Number	Kind	Begin	End			
00544 Feltwell	69	Cattle	5/1	8/31	100	Active	279

Other terms and conditions:

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 enclosures located within the grazing allotment are closed to all domestic grazing use.
8. Range improvements must be maintained in accordance with the cooperative agreement and range improvement permit in which you are a signatory or assignee. All maintenance of range improvements within designated Wilderness requires prior consultation with the authorized officer.
9. All appropriate documentation regarding base property leases, lands offered for exchange-of-use, and livestock control agreements must be approved prior to turn out. Leases of land and/or livestock must be notarized prior to submission and be in compliance with Boise District Policy.
10. Failure to pay the grazing bill within 15 days of the due date specified shall result in a late fee assessment of \$25.00 or 10 percent of the grazing bill, whichever is greater, not to exceed \$250.00. Payment made later than 15 days after the due date shall include the appropriate late fee assessment. Failure to make payment within 30 days may be a violation of 43 CFR § 4140.1(b)(1) and shall result in action by the authorized officer under 43 CFR § 4150.1 and § 4160.1.
11. Utilization may not exceed 50 percent of the current year's growth.

The current permit authorizes annual use (Table LVST-1); however, based on recent management actions over the last 10 years, it is clear that in most years you have used the allotment with different livestock numbers and seasons compared to the numbers and dates identified in the Mandatory Terms and Conditions, utilizing the flexibility that was authorized in the grazing permit. This resulted in an average actual use lower than the authorized active AUMs (Table LVST-2).

Table LVST-2: 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
Feltwell	279	224	-20%

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 actual number of AUMs and seasons of use over the past several years.

Resource Conditions

The BLM completed a rangeland health assessment, evaluation, and determination for the Feltwell allotment in 2013. That document concluded that some of the resources on the allotment were not meeting the Idaho S&Gs. These documents are available on the web:

http://www.blm.gov/id/st/en/prog/grazing/owhcc_grazing_group/grazing_permit_renewal3.html

The Feltwell allotment is used as a six-pasture system, and pastures 5 and 6 are private. Standards 1, 2, 3, 4, 7, and 8 of the applicable Standards for Rangeland Health are not being met in the Feltwell allotment; Standards 5 and 6 are not applicable to resources present within the allotment. Current livestock grazing management practices are significant factors in failing to meet Standards 1, 2, 3, 7, and 8, but are not a significant causal factor for not meeting Standard 4 (Table 3).

Soils - Uplands ¹

Current and past livestock grazing management practices are significant causal factors for failing to meet upland watershed Standard 1 in pastures 1, 2, and 4 in the Feltwell allotment; pasture 3 is meeting and pastures 5 and 6 are private.

Both past and active accelerated erosional processes have resulted in pedestaling of plants, water flow patterns, and widespread physical soil impacts by livestock hoof action from a large network of trails. Biological soil crusts are variable, ranging from being present to being greatly reduced or absent, especially in interspatial areas. Repeated spring and early summer season use by cattle under wet conditions have promoted mechanical damage to the soil surface and bare ground.

Non-mechanical impacts are associated with altered plant community composition and distribution from a decrease in relative abundance of large, deep-rooted native perennial bunchgrasses. Although soil surface loss varies across the landscape, the reduced protection resulting from absent vegetation and persistent cover increases the susceptibility to erosion, especially when soils are churned and bare. Where pugging occurs, soil structure and hydrologic function is altered and vegetation is impacted or removed.

Degraded ecological conditions have resulted in the departure from reference conditions, affect infiltration and runoff, and do not project improvement in watershed health, especially with spring grazing and limited rest. Taken together, the decreased ecological function and impaired soils indicate that soil and hydrologic function are compromised. Current and past livestock management is the primary causal factor in not meeting Standard 1 and ORMP soil management objectives of improving unsatisfactory watershed health/conditions in the Feltwell allotment.

¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.1 and Appendix E.

Vegetation - Uplands²

Rangeland Health Standard 4 is not being met in pasture 4 of the Feltwell allotment; the Standard is being met in pastures 1, 2, and 3. Pastures 5 and 6 are private. Although 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) away from reference site conditions and a greater dominance by increaser species (e.g., Sandberg bluegrass and squirreltail), historic grazing and invasive annuals are the causal factors in not meeting Standard 4.

Qualitative rangeland health assessment data indicate that Standard 4 in pasture 4 is not being met due to departure of functional/structural groups in three RHAs dominated by shallow-rooted bunchgrass and invasive annuals, rather than the ecological reference site conditions dominated by deep-rooted species (bluebunch wheatgrass and Idaho fescue).

The ORMP management objective to improve unsatisfactory and maintain satisfactory vegetation health/condition on all areas is also not met within pasture 4. Vegetation communities dominated by shallow-rooted bunchgrasses in pasture 4, with the expansion of annual invasive grasses, lead to a conclusion that the vegetation management objective is not met. Historic livestock grazing and annual invasives are the causal factors for not meeting ORMP management objectives.

Water Resources and Riparian/Wetland Areas³

Standards 2 and 3 are currently not being met in pastures 1-4 of the Feltwell allotment. However, pastures 1, 2, and 4 contain only short reaches of stream that are currently used as water gaps.

Within pastures 1, 2, and 4, approximately 0.2 mile of Minear Creek, Owl Creek, and a tributary of Owl Creek were rated functional at-risk (FAR) because there were unstable banks, the channel was incised, and sedimentation was occurring. Within pasture 3, approximately 0.2 mile of Owl Creek and 0.7 mile of a tributary to Owl Creek were also assessed FAR (Table RIPN-20 in EA) because there was inadequate riparian vegetation present to stabilize and protect the stream banks and channels.

Standard 7 is not being met in Lone Tree Creek, Minear Creek, Owl Creek, and an unnamed creek because they are water-quality limited (IDEQ) and do not meet the beneficial uses assigned to the watershed. The habitat bioassessments indicated the *E. coli* pollutant as the cause for not meeting the beneficial uses and that current livestock grazing has caused or contributed to *E. coli* contamination.

Wildlife/Wildlife Habitat and Special Status Animals⁴

Upland Habitat

Pastures 1, 2, and 3

Pastures 1, 2, and 3 are managed as native plant communities. Plant community information associated with the determination for Standard 4 identified that these pastures are meeting Rangeland Health Standards. Sage-grouse habitat assessment data collected in 2012 supports the evaluation of Standard 4. Therefore, the plant community composition and structure are providing adequate upland habitat condition for sagebrush steppe-dependent species.

² For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.2 and Appendix E.

³ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.3.

⁴ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 3.3.8.1.4 and Appendix E.

Pasture 4

Pasture 4 of the allotment is managed as a native plant community and is not meeting Standard 4. Evaluation of Standard 4 noted an increase in annual invasive grass species, showing a transition in the plant community composition from native bunchgrasses to more grazing-tolerant exotic species. Annual species do not have the robust growth form or stature like that of bluebunch wheatgrass and do not provide the plant community composition, structure, and function for sagebrush steppe-dependent species. Because of the undesirable transition in plant community composition identified and the absence of any other vegetation information (e.g., sage-grouse habitat assessment data), this allotment is not providing adequate upland habitat conditions for sagebrush steppe species and is not meeting Standard 8 due to historic livestock practices and increased dominance of invasive annuals.

Riparian Habitat

Evaluation of the allotment under Standards 2, 3, and 7 determined that streams within this allotment are not properly functioning and are not meeting water quality parameters due to historic and current livestock grazing. Streams, springs, and wetlands that are functioning-at-risk are lacking adequate riparian vegetation 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, 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 (Centrocercus urophasianus)

Modeling results indicate that all (100 percent) of the Feltwell allotment lies within preliminary priority habitat (PPH) for sage-grouse. No active leks are known to occur within this allotment. This allotment provides seasonal breeding, upland summer, riparian, and winter habitat for sage-grouse. Overall, sage-grouse habitat assessments showed that this allotment is providing suitable overstory/understory conditions for breeding, upland summer, and winter habitat conditions for sage-grouse.

Columbia Redband Trout and Columbia Spotted Frog

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

Guidelines for Livestock Grazing Management

The BLM's 2013 Determination for the Feltwell allotment identified grazing management practices that did not conform to the BLM's Guidelines for Livestock Grazing Management for Idaho (Table ALLOT-1). Specifically, grazing management did not conform to the following guidelines:

Guideline 1: Use grazing management practices and/or facilities to maintain or promote significant progress toward adequate amounts of ground cover (determined on an ecological site bases) to support infiltration, maintain soil moisture storage, and stabilize soils.

Guideline 3: Use grazing management practices and/or facilities to maintain or promote soil conditions that support water infiltration, plant vigor, and permeability rates and minimize soil compaction appropriate to site potential.

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

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

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

Guideline 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.

Table ALLOT-1: 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 <i>and</i> Current Livestock Grazing Significant Causal Factor	Standards Not Applicable	Guidelines Not Met
Feltwell	None	None	4	1, 2, 3, 7, 8	5, 6	1, 3, 5, 7, 8, 10, 11, 12

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

Issues^f

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 the Feltwell allotment:

1. Habitat conditions for greater sage-grouse: Sage-grouse habitat health is directly related to upland vegetation and watershed conditions. Specific areas of the Feltwell 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.
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.

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

Alteration 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. Noxious and invasive weeds: Livestock grazing and trailing has the potential to increase or spread noxious and invasive weeds.
6. Socioeconomic impacts: Livestock grazing affects local and regional socioeconomic activities generated by livestock production.
7. Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire.
8. Climate Change: The issue of climate change and its relationship to the proposed federal action of renewing this grazing permit 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 in the Morgan Group EA include: Alternative 1 - No Action/Current Condition, Alternative 2 - Permittee's Application, and Alternative 5 - No Grazing, as well as Alternatives 3 and 4 which were developed based on resource constraints, applied as appropriate. These alternatives were developed in response to current conditions on the Feltwell 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, and Alternatives 1-5 were considered in detail and analyzed for the Feltwell allotment.

The Preliminary Morgan Group EA detailing these alternatives was made available for public review and comment for a 21-day period ending November 8, 2013. The general themes of the alternative as well as the specifics of how they apply to the Feltwell allotment are discussed in detail in the Morgan Group EA. 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 10 years with modified terms and conditions consistent with the following:

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

Implementation of this alternative over the next ten years will allow the Feltwell 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) would be as follows:

Table LVST-3: WF & Carolyn D. Peton Mandatory Terms and Conditions

Allotment	Livestock		Grazing Period		% PL ⁶	Type Use	AUMs
	Number	Kind	Begin	End			
00544 Feltwell	69	Cattle	6/13	11/15	63	Active	188

Other terms and conditions:

1. Cattle numbers may vary up to a maximum of 69 head; however, AUMs may not exceed 188.
2. Grazing use will be in accordance with the grazing schedule identified in the final decision dated _____ of the Owyhee Field Office Manager (see Table 5). Changes to the scheduled use require approval.
3. Livestock turn-out is subject to the Boise District range readiness criteria.
4. You are required to submit a signed and dated Actual Grazing Use Report Form (BLM Form 4130-5) for each allotment you graze. The completed form(s) must be submitted to this office within 15 days of the last day of your authorized annual grazing use.
5. Salt and/or supplements shall not be placed within one-quarter (1/4)-mile of springs, streams, meadows, aspen stands, playas, special status plant populations, or water developments. Use of supplements other than the standard salt or mineral block on public land requires annual authorization by the authorized officer.
6. Trailing activities must be coordinated with the BLM prior to initiation. A crossing permit may be required prior to trailing livestock across public lands. Permittee will notify any/all affected permittees or landowners in advance of crossing.
7. 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.
8. Livestock exclosures located within the grazing allotment are closed to all domestic grazing use.
9. Prior to turn-out, all range improvements must be maintained and in accordance with the cooperative agreement and range improvement permit in which you are a signatory or assignee. All maintenance activities that may result in ground disturbance require prior approval from the authorized officer.
10. All appropriate documentation regarding base property leases, lands offered for exchange-of-use, and livestock control agreements must be approved prior to turn out.
11. Upland forage utilization by livestock on key upland herbaceous forage species is limited to 50 percent.

Livestock Management

The permit for grazing use in the Feltwell allotment would be defined as shown in Table LVST-4.

Table LVST-4: Alternative 4 grazing schedule for the Feltwell allotment

Pasture	Year 1	Year 2	Year 3
Pasture 1	Rest	8/21-9/30	10/1-10/29
Pasture 2	Rest	8/21-9/30	10/1-10/29

⁶ PL is based on percentage of BLM lands in the allotment.

Pasture	Year 1	Year 2	Year 3
Pasture 3	6/13-9/28	10/1-11/15	Rest
Pasture 4	9/29-10/22	Rest	9/7-9/30
Pasture 5/6 (Private)	3/1-2/28	3/1-2/28	3/1-2/28

Notes on the Terms and Conditions

WF and Carolyn D. Peton will be offered a grazing permit for a term of ten years for the Feltwell allotment. Adoption of Alternative 4 for the Feltwell allotment will result in a reduction in AUMs from your current permit; however, the affected 91 active use AUMs will not be transferred to suspension, in conformance with regulatory direction at 43 CFR § 4110.3-2. Permitted use within the Feltwell allotment will be as follows (Table LVST-5):

Table LVST-5: Permitted Use

Allotment	Active Use	Suspension	Permitted Use
Feltwell	188 AUMs	0 AUMs	188 AUMs

Other Notes on the Proposed Decision

Finally, it is my Proposed Decision not to authorize additional projects.⁷ The existing coordinated process to identify, analyze, and authorize as appropriate the restoration, improvement, or development of livestock water sources and other projects remains in place for project-specific consideration outside the permit renewal process. Project maintenance obligations identified in current range improvement permits and cooperative agreements for range improvements are unchanged by this Proposed Decision. Implementation of this Proposed Decision is contingent upon maintenance of projects in a functioning condition (i.e., boundary and internal fences are in such good and functioning condition as to assure their ability to accomplish the purposes for which they were constructed, barriers to livestock movement).

Rationale

Record of Performance

Pursuant to 43 CFR § 4110.1(b)(1), a grazing permit may not be renewed if the permittee seeking renewal has an unsatisfactory record of performance with respect to its last grazing permit. Accordingly, I have reviewed WF and Carolyn D. Peton’s records as a grazing permit holders for the Feltwell 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 the Morgan Group EA number DOI-BLM-ID-B030-2013-0023-EA, the rangeland health assessment, evaluation, and determination and other documents in the project record, it is my Proposed Decision to select Alternative 4 for the Feltwell 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 Feltwell allotment meeting or making significant progress towards meeting the resource objectives of the ORMP and the Idaho S&Gs.

⁷ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3.

Issues Addressed

Earlier in this decision I outlined the major issues that drove the analysis and decision making process for the Feltwell 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 Feltwell allotment was in large part because of my understanding that this selection best addressed the allotment's 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 of 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 land manager.⁸

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

AND

⁸ Your allotment is, as you know, part 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 EAs and an EIS that forms the basis of 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 part of a group of allotments located in a particular landscape, the BLM Owyhee Field Office. That is, I am looking not just at your individual allotment, reviewing its rangeland health assessment, evaluation and determination, and selecting an alternative that will best address this allotment's ecological conditions and BLM's legal responsibilities (for the purposes of this decision), but rather I am looking at this allotment from a landscape perspective. Viewed this way, it is clear that there are problems common to the Owyhee 68 allotments.

Of the approximately 60 allotments that have riparian areas, at least 47 are not meeting Idaho S&Gs for riparian/water issues due to current livestock management. Of approximately 73 allotments, 43 are not meeting the Idaho S&Gs for upland vegetation. In many cases, performance under Standard 8 tracks these results. In spite of the efforts of the 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 Owyhees, I have a steward's responsibility to further the health and resilience of this landscape.

Adding to these considerations, we live in a time of uncertainty. Climate change presents an uncertainty whose impacts we cannot clearly discern, but as land stewards we must factor into our decisions a consideration of how best to promote resiliency on the landscape. Added to this is 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 function.

The sage-grouse is an indicator species for the sagebrush ecosystem, and thus the attributes of suitable sage-grouse habitat provide an effective barometer for health of the sagebrush ecosystems that dominate the Feltwell 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, upland vegetation and watershed conditions.⁹

Rangeland Health Standard 4 is not met in pasture 4 of the Feltwell allotment, the Standard is being met in pastures 1, 2, and 3, and pastures 5 and 6 are private. Implementation of Alternative 4 would improve current conditions of the Feltwell allotment. Pasture 4 would move toward meeting Standard 4 and ORMP objectives.

Alternative 4 would prescribe June-through-November grazing with a 3-year rotation grazing system (at least 2 out of 3 years of deferment or rest in the critical growing season) and a maximum of 69 head of cattle and 188 AUMs. Although historic grazing and invasive annuals are the causal factors for not meeting Standard 4 in pasture 4, increased years of deferment out of the critical growing season for upland vegetative communities and an AUM reduction of 53 percent in a 10-year permit, based on average actual use and rest as compared to Alternative 1 in the Feltwell allotment, would allow recovery of upland vegetation communities and move the allotment toward meeting vegetation Standards and ORMP objectives for vegetation health. Vegetation resources not meeting ORMP vegetation management in pasture 4 would have the opportunity to improve unsatisfactory vegetation health and condition as compared to Alternative 1.

Alternative 4 would provide yearly deferment or rest from spring grazing for all pastures, which would reduce physical impacts to soils during the wettest period and that most susceptible to damage. Additional benefits are provided from a minimum of 2 out of 3 years of deferment or rest from critical growing season use and summer riparian grazing. This offers native plant communities an opportunity to improve and respond with increased soil cover, decreased bare ground, reduced susceptibility to accelerated erosion. It would also lessen concentrated summer use on upland soils that surround riparian areas. Subsequently, the reduced spring and critical-growth-period grazing and adjustment in stocking rates would result in a reduction of livestock numbers and active AUMs that would benefit soils by limiting physical impacts from hoof action. As a whole, 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.

Currently, this allotment is providing adequate upland and sage-grouse habitat conditions in pastures 1 and 3 but not providing adequate upland and sage-grouse habitat conditions in pasture 4. Under Alternative 4, current conditions in pasture 1 and 3 (although already meeting Standard 4) would benefit from the increased deferment/rest and 53 percent decrease in AUMs, further improving plant vigor and health and habitat composition and structure. Sage-grouse habitat would also benefit because of the reduced grazing pressure during the critical growing season (May 1 through June 30), which would prompt an increase in the abundance of security and hiding cover during the nesting/early brood-rearing (April 1 through June 30) and late brood-rearing (July 1 through August 31) periods. Upland and sage-grouse habitat conditions in pasture 4 would significantly improve because of the 2 out of 3 years of deferment/rest and reduced AUMs. Plant vigor and health would improve along with habitat composition and structure. Nesting/early brood-

⁹ 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 and Appendix E.

rearing sage-grouse and late brood-rearing would benefit because of the increased security and hiding cover, which would reduce detection and predation by terrestrial and avian predators.

Overall, under Alternative 4, current upland habitat conditions would be maintained and improved and would show considerable improvement in habitat composition and structure. Sage-grouse would benefit because of improved hiding and escape cover during nesting/early brood-rearing and late brood-rearing periods and the increased availability of forage. Under Alternative 4, current upland and sage-grouse habitat conditions will be maintained and improved and continue to meet 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. Alteration of the riparian community may affect the health and sustainability of fish and amphibian populations.

On the Feltwell allotment¹⁰ under Alternative 4, pastures 1 and 2 will be available to grazing during the summer for one year, during the fall for one year, and rested the third year of a 3-year rotation. Pasture 3 would be open to grazing during the summer for one year, during the fall for one year, and rested the third year. Pasture 4 would be open during the fall for 2 years and rested the third year. Consequently, within the allotment, 1.1 miles of perennial stream and 3.9 mile of intermittent stream would be affected by the impacts associated with the summer and fall seasons of grazing alternating among the years and pastures. Pastures 1-4 contain the riparian-wetland areas.

The Feltwell allotment is not meeting the Standards associated with riparian-wetland resources under current management. Under Alternative 4, the allotment would be managed under a defined 3-year grazing schedule, with growing season deferment and/or rest incorporated in every 2 out of 3 years. Thus, the impacts associated with grazing during the summer would be eliminated during the 2 years of rest. Therefore, the allotment would meet the Standards and attain the ORMP objectives under this alternative.

Currently the allotment is not providing adequate riparian habitat conditions in pastures 1 and 3. Under Alternative 4, riparian function will substantially improve in pastures 1 and 3 due to the incorporation of critical growing season (July 1 through Sept 30) deferment/rest. Combined with a 53 percent reduction in AUMs, this grazing schedule would offer grazing relief 2 out of 3 years. This would aid in the recovery of the vigor and health of herbaceous and woody plants which dissipate the energy of high flows, trap sediments, harden streambanks, provide shade to streams, deliver woody debris, and improve water quality. As riparian habitat conditions improve, terrestrial and aquatic wildlife will benefit from the reduced access of livestock, improved stream, wetland, and spring habitats, and the subsequent improved availability of cover and forage.

Under Alternative 4, riparian function will improve and subsequently improve aquatic habitat conditions for wildlife and show significant progress toward meeting Standard 8 and ORMP objectives.

¹⁰ 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 and Appendix E.

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

No noxious and invasive weeds are known exist on public land on the Feltwell allotment. My selection of Alternative 4 for the Feltwell allotment will maintain or improve riparian and vegetative communities because the alternative was designed to improve rangeland health conditions. 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 health and vigor is improved and progress is made toward the ORMP vegetation management objective. Alternative 4 will promote native perennial species and therefore reduce the competition from invasive species establishment.

Issue 6: 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 on 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 provide, as accurately as possible, the best information about socio-economic impacts expected from the different alternatives, and I have utilized this information in making my Proposed Decision.

Hoping to ameliorate any abrupt economic impacts from implementation of Alternative 4 to you as a permittee, I attempted to develop a way to implement Alternative 4 that would have a less severe initial impact. However, given the BLM's regulatory requirement to make significant progress under a new permit following a determination that an allotment is not meeting Standards due to current livestock use, I determined that any mediated approach would have only minimal benefit and increased uncertainty for you, the permittee.

I acknowledge and regret the impact this decision will have on your operation; it is unfortunate that decisions such as this, made in fulfillment of BLM's management responsibilities to protect resources, have such effects.

Issue 7: Wildfire fuels: Livestock grazing has the potential to change vegetation that may affect wildfire.¹¹

During the NEPA process, some asked the BLM to consider using grazing to limit wildfire. The BLM has considered the issue and determined that it would be theoretically possible to use targeted grazing to create fuel breaks on the Feltwell allotment 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

¹¹ For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3 Alternatives considered and dismissed.

decided against it. Ultimately, implementation of Alternative 4 for the Feltwell 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.

Alternative 4 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.¹²

Issue 8: 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 Feltwell 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 4 combines season, intensity, and duration 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

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 Feltwell allotment. In selecting Alternative 4 for the Feltwell 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) past performance under the previous permit. The resource issues identified are primarily related to improper seasons of use and site-specific intensities of grazing use. By implementing Alternative 4, the resource issues

¹² For more detailed discussion, please refer to EA number DOI-BLM-ID-B030-2013-0023-EA Section 2.3

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.¹³

Finding of No Significant Impact

A FONSI was signed on November 20, 2013 and 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:

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

Conclusion

In conclusion, it is my decision to select Alternative 4 for the Feltwell allotment because livestock management practices under this alternative best meet the ORMP objectives allotment-wide and the Idaho S&Gs. Alternatives 1 and 2 fail to implement livestock management practices on the Feltwell 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), and 8 (Threatened and Endangered Animals). Alternative 5 has the potential to remove 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 Alternative 4, leads me to believe elimination of livestock grazing from the Feltwell allotment is unnecessary at this point.

This grazing decision and subsequent permits are being issued under the authority of 43 CFR 4100 and in accordance with the Owyhee Resource Management Plan (43 CFR 4100.0-8), thus all activity thereunder must comply with the objectives and management actions of the Plan.

Authority

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

- 4100.0-8 Land use plans. The ORMP designates the Feltwell 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

¹³ 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 for which the BLM is responsible. We recognize that each allotment has different ecology and management capability due to the size and location/topography which result in various issues and priorities. With these features in mind, attempts to coordinate grazing throughout the entire allotment were made by me and my staff with you and were informed by comments from the interested public. 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.

unless the authorized officer determines that a lesser term is in the best interest of sound management;

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

Right of Protest and/or Appeal

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

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

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

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

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

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

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

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

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

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

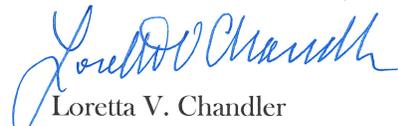
- (1) The relative harm to the parties if the stay is granted or denied.
- (2) The likelihood of the appellant's success on the merits.
- (3) The likelihood of immediate and irreparable harm if the stay is not granted, and
- (4) Whether the public interest favors granting the stay.

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

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

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

Sincerely,



Loretta V. Chandler
Owyhee Field Manager

Copies sent to:

Group 5 Proposed Decision Mail List

Company Name	First Name	Last Name	Address 1	City	State	Zip
Boise District Grazing Board	Stan	Boyd	PO Box 2596	Boise	ID	83701
Colyer Cattle Co.	Ray & Bonnie	Colyer	31001 Colyer Rd.	Bruneau	ID	83604
Chipmunk Grazing Assoc.	Elias	Jaca	PO Box 175	Marsing	ID	83639
Friends of Mustangs	Robert	Amidon	8699 Gantz Ave.	Boise	ID	83709
Gusman Ranch Grazing Association LLC	Forest	Fretwell	27058 Pleasant Valley Rd.	Jordan Valley	OR	97910
Holland & Hart LLP			PO Box 2527	Boise	ID	83701
ID Cattle Association			PO Box 15397	Boise	ID	83715
ID Conservation League	John	Robison	PO Box 844	Boise	ID	83701
ID Dept. of Agriculture	John	Biar	2270 Old Penitentiary Rd., PO Box 7249	Boise	ID	83707
ID Wild Sheep Foundation	Director: Jim	Jeffress	PO Box 8224	Boise	ID	83707
ID Wild Sheep Foundation	Herb	Meyr	570 E. 16 th N.	Mountain Home	ID	83647

Company Name	First Name	Last Name	Address 1	City	State	Zip
Idaho Dept. of Lands			PO Box 83720	Boise	ID	83720
Idaho Farm Bureau Fed			PO Box 167	Boise	ID	83701
IDEQ			1445 N. Orchard	Boise	ID	83706
Intermountain Range Consultants	Bob	Schweigert	5700 Dimick Ln.	Winnemucca	NV	89445
International Society for the Protection of Horses & Burros	Karen	Sussman	PO Box 55	Lantry	SD	57636
Jaca Livestock	Elias	Jaca	817 Blaine Ave.	Nampa	ID	83651
Juniper Mtn. Grazing Assn.	Michael	Stanford	3581 Cliffs Rd.	Jordan Valley	OR	97910
Land & Water Fund	William	Eddie	PO Box 1612	Boise	ID	83701
LU Ranching	Tim	Lowry	PO Box 132	Jordan Valley	OR	97910
LU Ranching	Bill	Lowry	PO Box 415	Jordan Valley	OR	97910
Moore Smith Buxton & Turcke	Paul	Turcke	950 W. Bannock, Ste. 520	Boise	ID	83702
Morgan Properties	David	Rutan	PO Box 277	Jordan Valley	OR	97910
Natural Resources Defense Council	Johanna	Wald	111 Sutter St., 20th Floor	San Francisco	CA	94104
Oregon Division State Lands			1645 NE Forbes RD., Ste. 112	Bend	OR	97701
Owyhee Cattlemen's Assn.			PO Box 400	Marsing	ID	83639
Owyhee County Commissioners			PO Box 128	Murphy	ID	83650
Owyhee County Natural Resources Committee	Jim	Desmond	PO Box 128	Murphy	ID	83650
Quintana Ranch LP	Tim	Quintana	3876 Hwy. 95	Homedale	ID	83628
Ranges West			2410 Little Weiser Rd.	Indian Valley	ID	83632
Resource Advisory Council	Chair: Gene	Gray	2393 Watts Lane	Payette	ID	83661
Schroeder & Lezamiz Law Offices			PO Box 267	Boise	ID	83701
Shoshone-Bannock Tribes	Tribal Chair: Nathan	Small	PO Box 306	Ft. Hall	ID	83203
Sierra Club			PO Box 552	Boise	ID	83701
Soil Conservation District	Cindy	Bachman	PO Box 186	Bruneau	ID	83604
South Mountain	Terry	Warn	PO Box 235	Jordan Valley	OR	97910

Company Name	First Name	Last Name	Address 1	City	State	Zip
Grazing Coop						
State Historic Preservation Office			210 Main St.	Boise	ID	83702
State of NV Div. of Wildlife			60 Youth Center Rd.	Elko	NV	89801
The Fund for the Animals, Inc.	Andrea	Lococo	1363 Overbacker	Louisville	KY	40208
The Nature Conservancy			950 W Bannock St., Ste.210	Boise	ID	83702
The Wilderness Society			950 W. Bannock St., Ste. 605	Boise	ID	83702-5999
US Fish & Wildlife Service			1387 S Vinnell Way, Rm. 368	Boise	ID	83709
USDA Farm Services			9173 W. Barnes	Boise	ID	83704
Western Watershed Projects			PO Box 1770	Hailey	ID	83333
Western Watershed Projects	Katie	Fite	PO Box 2863	Boise	ID	83701
Wrotten Land & Cattle Co.			30314 Juniper Mtn. Rd.	Jordan Valley	OR	97910
	Russ	Heughins	10370 W. Landmark Ct.	Boise	ID	83704
	Brett	Nelson	9127 W. Preece St.	Boise	ID	83704
	Anthony & Brenda	Richards	8935 Whiskey Mtn. Rd.	Murphy	ID	83650
	Martin & Susan	Jaca	21127 Upper Reynolds Creek Rd.	Murphy	ID	83650
	Vernon	Kershner	PO Box 38	Jordan Valley	OR	97910
	Ramona	Pascoe	PO Box 126	Jordan Valley	OR	97910
	Chad	Gibson	16770 Agate Ln.	Wilder	ID	83676
	Kenny	Kershner	PO Box 300	Jordan Valley	OR	97910
	Dale	Berrett	3540 Hwy. 95	Jordan Valley	OR	97910
	Loetta	Larsen	PO Box 156	Jordan Valley	OR	97910
	WF & Carolyn	Peton	PO Box 998	Veneta	OR	97487
	Phillip & Benjamin	Williams	1807 Danner Loop Rd.	Jordan Valley	OR	97910
	Senator: Mike	Crapo	251 E. Front St., Ste. 205	Boise	ID	83702
	Senator: James E.	Risch	350 N. 9 th St., Ste. 302	Boise	ID	83702
	Congressman: Raul	Labrador	33 E. Broadway Ave., Ste. 251	Meridian	ID	83642
	Congressman: Mike	Simpson	802 W. Bannock St., Ste. 600	Boise	ID	83702

Company Name	First Name	Last Name	Address 1	City	State	Zip
	Conrad	Bateman	740 Yakima St.	Vale	OR	97918
	Gene	Bray	5654 W El Gato Ln.	Meridian	ID	83642
	Dan	Jordan	30911 Hwy. 78	Oreana	ID	83650
	Floyd	Kelly Breach	9674 Hardtrigger Rd.	Given Springs	ID	83641
	Lloyd	Knight	PO Box 47	Hammett	ID	83627
	John	Romero	17000 2X Ranch Rd.	Murphy	ID	83650
	John	Townsend	8306 Road 3.2 NE	Moses Lake	WA	98837
	Thomas	Gluch	PO Box 257	Jordan Valley	ID	97910
	Bill	Baker	2432 N. Washington	Emmett	ID	83617-9126
	Ed	Moser	22901 Lansing Ln.	Middleton	ID	83644
	Charles	Lyons	11408 Hwy.20	Mountain Home	ID	83647
	John	Richards	8933 State Hwy. 78	Marsing	ID	83639
	Mindy	Kershner	2904 Jones Road	Jordan Valley	OR	97910
Office of Species Conservation	Cally	Younger	304 N. 8 th St., Ste. 149	Boise	ID	83702

Appendix J

This appendix hereby incorporates by reference the below language in its entirety into the DOI-BLM-ID-B030-2013-0023-EA Final Environmental Assessment (EA).

During public scoping and comment periods for the Morgan Group permit renewal process, suggestions were received from interested publics that the BLM's NEPA process would be better served if the agency would prepare an Environmental Impact Statement (EIS) rather than an EA and Finding of no Significant Impacts (FONSI) to identify and analyze the geographic extent of the environmental impacts of livestock grazing activities in these allotments.

The BLM published a Final EIS (DOI-BLM-ID-B030-2012-0014-EIS) on October 4, 2013, that analyzed the renewal of grazing permits on twenty-five allotments (known as Group 2) in the Jump Creek, Succor Creek, and Cow Creek watershed areas in the northern part of the Owyhee Field Office. This EIS defined Cumulative Impacts Analysis Areas (CIAAs) for social and economic effects and for the Owyhee subpopulation area, including, but not limited to (Connelly, Knick, Schroeder, & Stiver, 2004) sage-grouse habitat.

The BLM subsequently prepared three EAs (for the Toy Mountain Group, South Mountain Group, and the Morgan Group of allotments). When the CIAAs were defined, the boundaries were the same as the Group 2 EIS CIAA boundaries. The BLM found that the geographic boundary beyond which impacts to resources and habitat would no longer be measurable is the same for all groups. The rationale for establishing these boundaries is found in Section 3.4 of the Toy Mountain, South Mountain, and Morgan EAs where cumulative effects analysis begins; the cumulative effects analysis that resulted from the EIS did not unveil any effects not also recognized in the cumulative effects analyses in the EAs.