

BUREAU OF LAND MANAGEMENT
 Burns District Office 2465
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January 30, 2026

NOTICE OF PROPOSED DECISION

I. INTRODUCTION

The Bureau of Land Management (BLM) has completed the Bridge Creek Area Allotment Management Plans Final Environmental Impact Statement (FEIS), DOI-BLM-ORWA-B060-2021-0004-EIS. The BLM prepared the FEIS to analyze the effects of authorizing 10-year grazing permits and associated actions within the Bridge Creek Area which is administered by the Burns District, Oregon. The Bridge Creek Area consists of four allotments, the Hammond Fenced Federal Range (FFR), Hammond, Mud Creek, and Hardie Summer allotments. This area is located approximately 60 miles south of Burns, Oregon, near the town of Frenchglen, which is situated at the foot of the Steens Mountain (Map A – Vicinity¹). The allotments are located within the Andrews / Steens Field Office and partially within the Steens Mountain Cooperative Management and Protection Area (CMPA). The land status of each allotment is shown in Table 1.

Table 1: Land Status for Bridge Creek Area (Acres) by Allotment²

LAND ADMINISTRATION	HAMMOND	MUD CREEK	HARDIE SUMMER	HAMMOND FFR
Bureau of Land Management (BLM)-Managed	10,994	8,142	5,975	1,267
CMPA	2,859	8,143	9,723	2,549
Bridge Creek Wilderness Study Area	1,609	6,911	-	92
Steens Mountain Wilderness	-	-	39	-
Lands with Wilderness Character	-	0.22	1,526	0.04
Fir Groves Area of Critical Environmental Concern	-	-	464	13
U.S. Fish and Wildlife Service - Managed	638	0.5	-	7
Private	1,966	0.5	3,747	6,241
TOTAL ALLOTMENT ACRES	13,598	8,143	9,723	7,514

¹ All maps are created using the best information available at the time. Many of the range improvements and boundaries shown in these maps have been digitized and not GPS'd. While the BLM continues to GPS these features and is continuously updating their data for accuracy, maps shall only be used to provide a general visual. The actual location of the feature on the ground takes precedence over the location on maps.

² The row titled "BLM-Managed" includes all BLM-managed acres including acres of special designations and acres with no special designations. Bulleted special designations are identified; however, these acreages are not additive as some special designations overlap.

The FEIS, this Proposed Decision, and other information are available at the Burns BLM office or on the BLM's National Environmental Policy Act (NEPA) Register at <https://eplanning.blm.gov/eplanning-ui/project/1504684/510>.

The BLM is choosing to authorize livestock grazing, set terms and conditions for livestock grazing permits, and adopt allotment management plans (AMP) for the Hammond FFR, Hammond, Mud Creek, and Hardie Summer allotments as described in Alternative 2 because Alternative 2 meets the purpose and need and best balances the BLM's obligation to manage the public lands under principles of multiple use and sustained yield while also supporting the Secretary of Interior's Order 3419 Delivering Emergency Price Relief for American Families and Defeating the Cost-of-Living Crisis. This Proposed Decision, consistent with Alternative 2 of the FEIS, would approve terms and conditions for the 10-year grazing permits for the Hammond, Mud Creek, Hardie Summer, and Hammond FFR allotments and approve the AMPs for those allotments, including provisions for livestock grazing management, and approve range improvements, specifically the Bridge Creek water gap extension, fence removal, fence construction, and maintaining spring and pipeline developments. All range improvements will be constructed outside of Wilderness and Wilderness Study Areas (WSA) except for the Bridge Creek water gap extension, which qualifies as an exception to the WSA non-impairment standard.

This Proposed Decision, consistent with Alternative 2 of the FEIS, would increase livestock grazing from historical levels (as described in Chapter 2 of the FEIS) while maintaining grazing rotations designed to allow periodic rest to every pasture; allow temporary non-renewable (NR) grazing on seedings to help manage wildfire risk; facilitate administrative access to the allotments to allow for the most accurate monitoring and adaptive management; relocate range improvements outside of sage-grouse leks and key sage-grouse habitat; remove fencing from WSAs; and provide a phased approach to reintroducing livestock into areas that have not been grazed since 2019. Under that phased approach, animal unit months (AUMs) would not be increased unless the allotment continues to meet applicable Rangeland Standards and Guidelines (S&Gs), or livestock is not a causal factor if S&Gs are not achieved, which will ensure that increased grazing levels will not adversely impact riparian, upland, soil, and wildlife resources. Alternative 2 also best protects riparian habitat and will allow Redband Trout habitat in Krumbo Creek Pasture to recover through installation of fencing in water gaps and by ensuring that grazing in the Krumbo Creek pasture will not resume unless the pasture is meeting all applicable S&Gs (except for authorized trailing/crossing) which will reduce the risk of Redband Trout redds being trampled by livestock. Additionally, removal of 0.14 miles of fence from the Steens Mountain Wilderness area will help to improve wilderness values and maintain wilderness characteristics in the Bridge Creek WSA. In adopting Alternative 2, the BLM is best balancing several objectives. Resuming livestock grazing contributes to livelihoods and the local economy. Ranching in this region supports family livelihoods, preserves local identity, and reflects a way of life passed down through generations. By implementing Alternative 2 the BLM would be able to support this way of life and help meet secretarial priorities as identified in Secretary's Order 3419 by supporting ranching jobs and supporting families. The BLM anticipates that authorizing the grazing permits and installing the proposed range developments will support local jobs and provide long-term local economic benefits through the establishment of sustainable ranching operations on the allotments. This Proposed Decision, consistent with Alternative 2, would

provide for a livestock grazing management system to protect sensitive resources, including upland and riparian areas. Through analysis in the FEIS, the BLM has reviewed conditions throughout the allotments and designed a system which fully addresses those conditions.

In contrast, Alternative 1 was not selected because it would have applied to the grazing permits more restrictive terms and conditions which limit flexibility with respect to season of use. Authorized AUMs would remain at historic levels on all four allotments, and the use of crested wheatgrass seeding in the Hammond Allotment would not be authorized. Alternative 1 would not fully protect the Bridge Creek riparian areas because livestock would continue to have limited access to Bridge Creek which would negatively impact the recovery of the riparian area compared to Alternative 2. The risk of trampling Redband Trout redds would be higher than under Alternatives 2 and 4; and there would be no measurable changes to wilderness characteristics in the Bridge Creek WSA.

Alternative 3 was not selected because this alternative would create a higher risk of the allotment not meeting S&Gs than the other alternatives and would not provide for trailing/crossing permits or administrative access across private lands for monitoring. Alternative 3 would result in more resource impacts than Alternative 2 due to reconstruction of a corral at Grandad Reservoir, removal of Bridge Creek water gap fencing allowing livestock access to the perennial riparian areas, construction of pipeline through sage-grouse habitat, and supplemental feeding of hay, which would result in a larger area of disturbed soil and increased risk of invasive plant occurrences. Alternative 3 also lacks a phased approach to reintroducing livestock grazing into Krumbo Creek, which is more likely to result in adverse impacts to riparian and wildlife resources. In addition, Alternative 3 lacks a defined grazing rotation system (e.g., rest/rotation or deferred grazing system) and relies solely on intensive monitoring (by the BLM) of range conditions to determine each year's grazing plan without facilitating the access required to conduct that monitoring. There would be increased trampling of sagebrush due to supplemental feeding, and maximizing AUMs would decrease greater sage-grouse (GRSG) habitat compared to Alternative 2. There would be no fence removal from the Steens Mountain Wilderness and wilderness characteristics would remain diminished by the presence of the fence. The AUMs under this alternative would exceed what was authorized in 1976, which would be inconsistent with meeting applicable non-impairment standards of the Bridge Creek WSA.

Alternative 4 would minimize risks to GRSG and Redband Trout habitats while authorizing some grazing; however, it would be less grazing for the permittees than Alternatives 1-3 and would not accomplish as much to meet the objectives of Secretary's Order 3419. Using a 35% utilization limit, grazing management would be more difficult than under the other alternatives because of the decrease in the season of use and limitations on the ability to have a grazing rotation system that covers multiple treatments. That utilization limit would also delay sagebrush recovery because sagebrush would have to compete with more grasses and forbs which would in turn have a slightly more negative effect on the sagebrush component of GRSG habitat than would be seen under Alternatives 1-3 where higher utilization levels are allowed. Because there would be less biomass removed, contributing to an accumulation of fine fuels, there would be a higher risk for large scale wildfires. Accordingly, this alternative has the highest risk that catastrophic wildfire would adversely affect the wilderness characteristics in the Bridge Creek

WSA. Because Alternative 2 thoroughly protects resources, including upland and riparian areas, the BLM finds that the decreased economic contribution of Alternative 4 is not warranted.

Additional rationale and reasons why the BLM has selected Alternative 2 as the Preferred Alternative can be found in the rationale section below. Chapter 3 of the FEIS also provides additional information and an in-depth analysis of impacts to identified resources under each alternative that informs the rationale for selecting Alternative 2 for this Proposed Decision.

II. SUMMARY OF PUBLIC PARTICIPATION

The BLM began public outreach for this process during the 2020 Bridge Creek Area Environmental Assessment (DOI-BLM-ORWA-B060-2020-0001-EA (Bureau of Land Management. 2020a)) where similar alternatives were proposed and presented to the public for their consideration. In December 2021, a Notice of Intent was issued in the Federal Register initiating a 30-day scoping period for the Draft EIS. Additionally, a scoping letter was mailed to interested publics to solicit issues and potential impacts and alternatives to be addressed in the Draft EIS. The scoping letter was posted to the BLM's National NEPA Register, and separate letters were also mailed to the Burns Paiute Tribe and other agencies to invite them to be cooperating agencies on this project. This scoping period provided an opportunity to involve the public in the NEPA process and helped the BLM gauge the concerns of those who have a stake in the management of the public lands in this area. The BLM received 61 scoping letters representing nine organizations, two tribes, and 53 individuals. Of the individual letters, 23 were form letters, eight of which provided the BLM with additional unique comments. Those comments and concerns were brought forward as issues in the Draft EIS (described in Chapter 1, Section 1.6) and were incorporated, as appropriate, into the alternatives described in Chapter 2 of the Draft EIS.

On January 10, 2025, publication of a Federal Register Notice announced the availability of the Draft EIS and initiated a 45-day public comment period. On the same day, the BLM sent a letter to 129 individuals, groups, tribes, and agencies about the comment period, and posted the Draft EIS on BLM's ePlanning website. A virtual public meeting was held on February 13, 2025, with 10 attendees. The Burns District received nine identical form letters and 16 unique comments. The BLM reviewed all submissions, addressed substantive comments, and incorporated relevant information into the FEIS. A summary of changes made between the Draft EIS and FEIS was included in the Introduction of the FEIS and responses to substantive comments are provided in Appendix K of the FEIS.

III. RATIONALE FOR DECISION

This area has been largely ungrazed since 2014, with some limited grazing occurring in 2019. The Bridge Creek Area is allocated as available for livestock grazing in the 2005 Andrews Management Unit AMP/Steens Resource Management Plans (RMP) and Records of Decision (ROD). This gap in authorized grazing was due to the BLM's determination that the permittee did not qualify in 2014 for permit renewal; several legal challenges and decisions followed the non-renewal.

The BLM decision to resume grazing in this area, consistent with Alternative 2 of the FEIS, is appropriate for the following reasons:

- The Proposed Decision responds to external requests to consider authorizing 10-year term livestock grazing permit(s) for the Hammond, Mud Creek, Hardie Summer, and Hammond FFR allotments, to adjust pasture and allotment boundaries and administratively move pastures dominated by private property into the Hammond FFR, and to adjust available active use AUMs in the Hammond Allotment to manage the higher crested wheatgrass production within the allotment.
- The Proposed Decision would reduce standing fine fuel biomass through biological thinning of forage in the Hammond, Hardie Summer, and Mud Creek allotments. Reducing fine fuel biomass accumulation will maintain plant vigor. Standing dead material in deep-rooted perennial grasses results in decreased plant vigor, and residual buildup of fine fuels increases fire intensity and plant kill risk. In addition, accumulating fine fuels poses an elevated risk of largescale wildfire within the Bridge Creek Area. Wildfires often result in subsequent annual grasses spread, which results in reduced ecological function and increased risk of catastrophic wildfire.
- Implementing AMPs for the Hammond, Hardie Summer, Mud Creek, and Hammond FFR allotments and installing, modifying, or removing range development projects all aid in overall management of the allotments, promoting ecological health, and ensuring S&G achievement, or, in the absence of achievement, significant progress toward achievement is made in conformance with the Guidelines for Livestock Grazing Management (43 CFR Subpart 4180 or any successor regulation or policy).
- The Proposed Decision would ensure that livestock grazing is consistent with resource and management objectives from the August 2005 Andrews Management Unit (AMU) and Steens Mountain CMPA RMPs/RODs (Bureau of Land Management 2005b; Bureau of Land Management 2005a), as amended by the 2015 Oregon GRSR Approved RMP Amendment (ARMPA)/ROD (Bureau of Land Management 2015a).
- The authorization of grazing permits and modification of grazing management is in accordance with 43 CFR 4130.2(a), including that there are appropriate terms and conditions to ensure conformance with part 4180.

The Proposed Decision would prescribe a grazing rotation system that addresses riparian concerns, increases permitted AUMs over a five-year period in the Hammond Allotment, and builds flexibility in permitted grazing use that adjusts to atmospheric, seasonal or other environmental conditions. The Proposed Decision would retain grazing on public lands, improve water resources and riparian habitat, promote the purpose and objectives of the Steens CMPA Act of 2000, and fulfill the BLM's obligation to manage the public lands under principles of multiple use and sustained yield. Selection of any of the other alternatives analyzed in Chapter 2 of the FEIS would not as effectively allow for balancing multiple use, and Alternative 5 would not authorize livestock grazing in any of the allotments.

Detailed analysis regarding the environmental impacts of each alternative can be found in Chapter 3 of the FEIS. Key resource issues for the Bridge Creek Area FEIS that were primary factors in selecting the alternative are briefly described below.

A. The Reasons BLM Selected Alternative 2 (FEIS Section 2.4) for this Proposed Decision are:

- The boundary adjustments for which Alternative 2 provides would help to limit the complexity in management of public lands due to land ownership boundaries.
- Alternative 2 balances short-term and long-term costs and benefits to permittees.

Grazing Management (FEIS Section 3.6)

- Specific terms and conditions in this alternative address land health, provide thresholds and responses, provide for administrative access across private lands, and authorize trailing.
- The permitted seasons of use are expanded to allow for more flexibility as to when the forage can be used within the allotments.
- Measures and actions described in the FEIS (Sections 2.1.1–2.1.3, or 2.1.7) are included, and AMPs would be implemented.
- Hammond Allotment
 - AUMs in the Hammond Allotment would increase over a 5-year period (in the crested wheatgrass seeding pastures) to permanently adjust permitted AUMs to carrying capacity of the crested wheatgrass seedings. In the short term, the effects over the five years of implementation would be the same as the effects of historical grazing between 1984 and 2014 because the permanent increase in AUMs would be similar to what was previously authorized as NR AUMs. In addition, the same utilization thresholds that limit the use on desirable deep-rooted perennial grasses regardless of the AUMs authorized will be in place. If utilization thresholds are reached before full AUMs are used, the livestock would be moved to the next pasture, allotment, or off for the season, which would protect biological soil crusts from impacts of improper grazing.
 - Flexibility adds the first half of the early and winter grazing seasons of use.
 - Removal of fences that are not functional or effective make grazing management easier to carry out, with less risk to livestock and wildlife, such as the GRSG, from potential entanglement.
- Lower Pasture of Mud Creek Allotment
 - Grazing would begin at a 35 percent utilization threshold with increases/decreases based on post-season livestock grazing monitoring results. The consideration for the lower utilization threshold with increases over time is to examine effects to wildlife species, such as GRSG.
 - Flexibility in livestock grazing management for the Mud Creek Allotment would allow multiple options for livestock to graze outside of the critical growing period for perennial bunchgrasses, including the early, defer, and winter seasons of use.
- Hardie Summer Allotment
 - Hardie Summer would mostly continue to be defer season of use but will also have opportunity to have early winter grazing.
 - Removal of fences that are not functional or effective will make grazing management easier to carry out with less risk to livestock from potential entanglement.
 - Removal of 0.14 miles of fence out of the Steens Mountain Wilderness Area will help to improve wilderness values and maintain wilderness characteristics in the Bridge Creek WSA.

- New fence construction in Hardie Summer would make it easier to manage grazing within the Little Fir Creek corridor.

Vegetation/Annual Grasses/Fuels (FEIS Section 3.13)

- The utilization threshold would be consistent at a moderate grazing level of 50 percent use on native bunchgrasses and 60 percent on crested wheatgrass. Once utilization thresholds have been met, livestock would transition to another pasture or allotment or exit the Bridge Creek Area.
- The AUMs component of livestock level of use may be augmented by the authorization of NR AUMs. If livestock grazing during the initial grazing period is less than 30 percent on perennial bunchgrasses following full permitted use, additional AUMs could be authorized until utilization thresholds are reached (if permitted use is over 30 percent, no NR AUMs would be authorized within that pasture).
- Utilization thresholds in the Lower Field of the Mud Creek Allotment may change as a result of adaptive management. Utilization thresholds are proposed to vary between 35 percent at initial resumption of grazing, up to 50 percent, based on monitoring. This provides the ability to make changes that respond to GRSG habitat needs by retaining taller vegetation for nesting within the vicinity of a nearby lek.
- Grazing in the Hardie Summer Allotment would be expanded to include winter season use but would only be used if weather and snow conditions allow. Flexibility in grazing season would mean that grazing rotations would be developed to respond to fuel accumulations during the season the livestock would utilize the vegetation and when the perennial vegetation is the least vulnerable to grazing stress.

Greater Sage Grouse (FEIS Section 3.7)

- Sagebrush responses would be tied to how grazing management affects sagebrush in terms of competition from other plants present that may be reduced by cattle. The Proposed Decision would set utilization rates at 60 percent for crested wheatgrass seedlings and 50 percent for native plants, both of which are considered moderate, with 60 percent being at the top end of moderate. Moderate to heavy grazing of perennial bunchgrass has been shown to increase sagebrush abundance and vigor (Austin and Urness 1998). These utilization rates would be beneficial in terms of reducing perennial bunchgrass competition and increasing sagebrush reestablishment and productivity. While some sagebrush seedlings are present within existing crested wheatgrass stands, overall recovery of sagebrush in these areas has remained poor and seed sources for long-term colonization by sagebrush are limited to current plants. Moderate to heavy utilization within these seedlings would promote sagebrush establishment.
- In the Lower Field of the Mud Creek Allotment the initial utilization threshold has been set to 35 percent and may be increased to 50 percent if monitoring shows that GRSG vertical cover is not being negatively affected by livestock grazing. This alternative proposes conservative grazing management within this pasture because it contains a lek. Required visual obstruction reading (VOR) monitoring will ensure that grazing management would not reduce perennial cover below what is recommended in the 2015 GRSG ARMPA Table 2-2 (Bureau of Land Management 2015a) for perennial grass height to promote healthy GRSG habitat. If monitoring finds residual vegetation being decreased below that target height, utilization within that pasture would be permanently

set at the last level that did not result in grass heights below 7". This Proposed Decision would ensure protection of nesting and early brood-rearing habitat within that pasture, promoting GRS habitat more than under Alternatives 1 and 3 by leaving enough residual cover to meet criteria described in Table 2–2 of the GRS ARMPA (Bureau of Land Management 2015a) and likely making effects of grazing to GRS populations in this area neutral.

- This Proposed Decision’s adaptive management would ensure that the GRS lek within the Mud Creek Allotment Lower Pasture allotment would have adequate coverage to protect GRS nests and chicks from predation. This would provide insurance that grazing would not negatively impact populations within the Bridge Creek Area and would result in more vertical cover from grasses being available in the Mud Creek Allotment Lower Pasture, compared to Alternatives 1 and 3, while the utilization threshold remains under 50 percent within that pasture.
- The permitted season of use under this Proposed Decision would be extended to allow for increased grazing flexibility and the ability to provide for improved grazing rotations. These extended permitted seasons of use would allow for additional deferred and late season use, outside of nesting and early brood-rearing seasons within the annual grazing season.
- This Proposed Decision would have less fine fuel accumulation than Alternatives 1, 4, and 5, which would reduce the risk of catastrophic wildfire and reduce the buildup of residual vegetation in the perennial grass crowns, making them more resilient to fire (Davies, Bates, Boyd, et al. 2021). Perennial grasses that are more resilient to fire, have decreased GRS mortality and can better protect the site from invasion by annual grasses following fire, therefore, better protecting GRS habitat connectivity.
- Riparian and wet meadow habitat within these allotments would continue to provide quality habitat as grazing management would not reduce GRS habitat quality or quantity (Monroe et al. 2017). The Bridge Creek drainage would be better protected by the water gap extension, leaving all resources for wildlife, including GRS. The grazing rotation proposed, along with the riparian thresholds and responses based on scientific literature, would provide enough rest of riparian areas to maintain riparian conditions.

Riparian/Water Quality/Fisheries (FEIS Sections 3.10)

The Bridge Creek Area has not been grazed since 2014, apart from some limited grazing in 2019. With the exception of Krumbo Creek, all other perennial riparian systems were at proper functioning condition (PFC) and considered to be in functioning condition prior to 2014. Therefore, it is assumed that had grazing continued past 2014, riparian conditions would have continued to improve or remain stable and properly functioning. The removal of livestock grazing in 2014 has not resulted in changes and these systems have continued to remain in PFC following the non-renewal of the grazing permit in 2014.

- Management actions outlined in FEIS Section 2.1.3 would improve the BLM’s ability to maintain and improve riparian conditions within the Bridge Creek Area to meet or continue to meet standards for rangeland health.
- Under Alternative 2, the Bridge Creek water gap modification will prevent livestock from travelling along the Bridge Creek drainage keeping livestock from accessing the perennial riparian areas.

- New thresholds and responses for grazing in riparian areas would maintain or improve riparian vegetation, habitat diversity, and geomorphic stability to achieve healthy, productive riparian areas and associated structure, function, process, and products by ensuring that vegetative removal does not occur at a high enough level to result in a permanent loss of newly established riparian vegetation.
- State water quality standards are expected to be maintained or improved throughout the Bridge Creek Area, due to thresholds and responses, which would provide positive impacts to water quality. It is expected that grazing would be compatible with all requirements under these three alternatives. Continued monitoring would be used to determine if standards are being met within those streams on BLM-managed land, whether livestock are a causal factor for any failures, and required adjustments to grazing would be applied to meet 43 CFR 4180 requirements.
- Alternative 2 would not cause degradation of water quality in Mud Creek as livestock would only access the Mud Creek drainage at water gaps.
- Krumbo Creek Pasture
 - Trailing/crossing would be authorized in Krumbo Pastures following terms and conditions described in FEIS Section 2.1.6 Crossing Permits.
 - Krumbo Creek Pasture would be rested until riparian conditions are improved and monitoring shows progress towards achieving S&Gs. Grazing would then occur within the “graze” season (May 1 to mid-July) for one year, with full rest the following year. This provides more of a reduced risk of livestock trampling redds than under Alternatives 1 and 3.
 - May to mid-July grazing is during a period when upland grasses are more green and more palatable, and higher stream flows make conditions less favorable for livestock to linger within the creek; these factors will reduce livestock use of riparian areas and promote continued upward trends.
 - Removal of livestock by mid-July would allow time for adequate regrowth of hydric herbaceous species which will protect streambanks during high flow periods the following spring.
 - Non-renewable AUMs are excluded from Krumbo Creek Pasture.

Wilderness (FEIS Section 3.15)

- Removal of 0.14 miles of fence within the wilderness would result in a net decrease of fence within the Steens Mountain Wilderness. Once the proposed fence changes occur, no wilderness would be available for grazing within the Bridge Creek Area.

Wilderness Study Areas (WSA) (FEIS Section 3.16)

- There would be no increase in AUMs within the Bridge Creek WSA.

B. The Reasons BLM did not Select Alternative 1 are:

- There would be continued complexity in the management of public land due to land ownership boundaries.
- Restrictive terms and conditions would limit the ability to use adaptive management and flexibility for grazing of the allotments.

- None of the measures/actions described in FEIS Sections 2.1.1–2.1.3, or 2.1.7 are included under this alternative and no AMPs will be implemented.
- Developments, such as fences and developed water sources, would be limited to what is already existing on the landscape on BLM-managed land (including the 0.14 miles of fence within the Steens Mountain Wilderness).

Grazing Management (FEIS Section 3.6)

- Between 1993 and 2014, the livestock movements between the Hammond and Mud Creek, and Mud Creek and Hardie Summer Allotments were often delayed. This meant that cattle entry into the allotment(s) was authorized by the BLM to be shifted one month to six weeks later and cattle exit was shifted a corresponding amount of time. These shifts placed grazing outside the permitted season of use and would not be authorized under Alternative 1 going forward.
- Authorized AUMs will remain at previously permitted levels, and no anticipated changes would occur in livestock distribution, or concentrated areas of use related to existing waters or fences.
- Hammond Allotment
 - Hammond Allotment NR AUMs were authorized (averaging between 1,000–1,500 NR AUMs between 1994 and 2012) but would not be authorized under Alternative 1.
 - The grazing treatments would still be during the second half of the early treatment, the graze treatment, defer treatment, and first half of winter treatment. Those grazing seasons would span between April 1 and October 30.
 - It is unlikely the 60 percent utilization on crested wheatgrass would be reached because the number of AUMs being proposed is low for forage that is available on average.
- Mud Creek Allotment
 - Would be used during the graze season (critical growing season for native perennial grasses), and the rotation would include periodic growing season rest.
- Hardie Summer Allotment
 - Would be grazed during the deferred season of use.

Vegetation/Annual Grasses/Fuels (FEIS Section 3.13)

- The season of use in each allotment is limited, and grazing would be driven more by a calendar than plant phenology.
- Grazing timing would be less responsive to variation in high production years (including invasive annual grasses).
- Non-renewable AUMs would not be authorized. Without the ability to authorize non-renewable AUMs, fine fuel accumulation in the grass plants would remain into the following grazing seasons. There would be an increased risk of a more severe fire that could affect the future resilience of bunchgrasses in the allotments. This would be more apparent in the Mud Creek and Hardie Summer Allotments.
- Forage levels may decrease and fine fuel accumulation increase, over the mid to long term.
- In the Hardie Summer Allotment, grazing during the early and much of the graze season is not feasible in the allotment due to elevation, snow, and access. Limiting the grazing

season of use to defer would mean that the opportunity to graze to reduce fuels for the future year is not realized.

Greater Sage-Grouse (FEIS Section 3.7)

- Impacts to GRSG would be like those described under Alternative 2, however Alternative 1 would have a slightly higher risk of GRSG fence collision compared to Alternative 2.

Riparian/Water Quality/Fisheries (FEIS Sections 3.10)

- The Mud Creek and Bridge Creek water gaps would continue to be used as under previous grazing management.
- Livestock would continue to have limited access to Bridge Creek, where animals were occasionally able to get around the fences and rim at the water gap.
- Krumbo Creek Pasture
 - Trampling of Redband trout would only occur in water gaps on Bridge Creek and Mud Creek, and along Krumbo Creek. As Krumbo Creek would be grazed early under this alternative, the risk of trampling redds would be higher than under Alternatives 2 and 4.
 - Livestock grazing would allow riparian areas to remain stable or improve in condition; livestock grazing would not be expected to result in increased temperatures due to vegetation removal. Any impacts to streambanks would be temporary in nature and would not have long-term impacts to Redband trout habitat.

Wilderness (FEIS Section 3.15)

- Grazing would be authorized in the 38-acre section of wilderness as it occurred prior to 2014, as well as at the time of designation in 2000.

Wilderness Study Areas (WSA) (FEIS Section 3.16)

- Overall, there would be no measurable changes to naturalness, solitude, primitive and unconfined recreation, or supplemental values under this alternative.

C. The Reasons BLM did not Select Alternative 3 are:

- Terms & Conditions would be like those for Alternative 2, except there would be no crossing permits or administrative access across private lands, and authorized AUMs would be increased immediately.
- There would be an elevated risk of impacts to multiple natural resources including cultural and riparian resources due to increased AUMs and a lack of fences in the Bridge Creek water gap.
- This alternative has the highest risk of non-compliance to permit Terms & Conditions.
- Non-renewable grazing would be authorized within the Mud Creek Allotment's Lower Pasture and Hammond Allotment's Krumbo Creek Pasture, as well as in any pasture that had not reached the utilization thresholds of 50 percent on native grass species and 60 percent on desirable non-native species.

Grazing Management (FEIS Section 3.6)

- All fences in the Bridge Creek water gap would be removed allowing livestock to regularly graze within the Bridge Creek drainage.
- With removal of fences in the Bridge Creek water gap and a new pasture, there would be improved livestock distribution across the Mud Creek Allotment by allowing livestock access to the drainage.
- Hammond Allotment
 - AUM levels would be immediately increased to 2,700 AUMs, which is beyond what would be allowed under any other alternative exceeding carrying capacity.
- Mud Creek Allotment
 - AUM levels would be immediately increased to 1,000 AUMs, beyond what would be allowed under any other alternative exceeding carrying capacity.
- Hardie Summer Allotment
 - This allotment may be grazed in June during the “graze” season of use. The grazing rotation would be determined annually by monitoring results and would provide for periodic growing season rest in each pasture, so impacts based strictly on season of use and grazing treatment would be similar to those under Alternative 2; however, impacts would be greater due to the increased AUMs.
 - Within the Hardie Summer Allotment, the same number of AUMs would be authorized as under Alternatives 1 and 2, but because of allotment boundary changes they would be on fewer acres (2,271 acres less than Alternative 1 and 1,600 acres less than Alternative 2).
- Hardie Summer FFR Allotment
 - This new allotment would be created under this alternative and would have an increase in AUMs and extended season of use (two additional months) when compared with Alternative 2 (FEIS Section 3.3.2.2.3).

Vegetation/Annual Grasses/Fuels (FEIS Section 3.13)

- Under this alternative there is an increased risk of utilization threshold exceedance, and it is more likely that all pastures within the Bridge Creek Area would reach the utilization thresholds annually.
- Because the permitted AUMs are higher under this alternative than Alternative 2, the frequency of authorizing NR AUMs may be less as there is increased potential that thresholds would be used with permitted AUMs, especially in allotments where AUMs permitted under this alternative exceed the calculated carrying capacities

Greater Sage-Grouse (FEIS Section 3.7)

- This alternative may promote more sagebrush establishment, abundance, and vigor compared to the other alternatives (Austin and Urness 1998) with the higher AUMs authorized. This higher use would promote shrub cover as the understory of the herbaceous fine fuel is grazed to those higher AUM thresholds under this alternative. However, since there is no grazing rotation provided, and no regular periods of rest are planned, this alternative would have negative effects on other components required for suitable habitat for GRSG, which would result in an overall negative impact to GRSG habitat.

- Supplemental feeding allowed under this alternative could result in increased trampling of sagebrush that is present in an area where feeding was to occur. This would have a negative impact on GRSG habitat by further reducing sagebrush abundance.
- Alternative 3 would have slightly more risk to sagebrush (due to supplemental feeding and increased miles of fences) and GRSG habitat compared to Alternative 2, which would have a net reduction in fences and no supplemental feeding.

Riparian/Water Quality/Fisheries (FEIS Sections 3.10)

- There is no general grazing rotation for any allotment under this alternative, which makes anticipating effects from livestock grazing on riparian conditions difficult and puts creeks at higher risk for damage.
- The removal of the water gap fencing would provide livestock access to the perennial riparian areas of Bridge Creek, with the season of use the same as the Lower Field in the Mud Creek Allotment.
- If the proposed use were graze/defer, hot season grazing, with no rest or recovery periods for riparian vegetation, livestock use could become detrimental to aquatic systems. It has been shown that annual repeated grazing throughout the hot season is nearly always detrimental to riparian vegetation (Bureau of Land Management 1997b).
- Livestock grazing would be allowed within Bridge Creek (including the water gap and areas currently excluded from livestock grazing), and AUMs across the Bridge Creek Area would increase, the risk of impacts on fisheries and trampling redds would be greater under this alternative compared to all other alternatives.
- Creation of a new custodial allotment, the Hardie Summer FFR, could result in degradation of riparian conditions if AUMs on the private portion of the FFR are increased and project design elements and required design features do not limit access to riparian areas.
- Without limits on livestock use, this increase in grazing intensity would likely have a negative impact within riparian areas. However, under all grazing alternatives livestock use would be limited through utilization and other use-based thresholds and monitored. Therefore, while the risk of exceeding thresholds is highest under this alternative, resulting in higher riparian impacts compared to other alternatives, assuming all thresholds and responses are followed, impacts to riparian vegetation and water quality would be similar to those described under Alternative 2.
- Krumbo Creek Pasture
 - Krumbo Creek Pasture would not be rested under this alternative, and with no general grazing rotation, the risk of trampling redds in Krumbo Creek would be increased.
 - Without rest of this pasture riparian conditions are less likely to improve or make progress towards achieving S&Gs than under Alternatives 2 and 4.

Wilderness (FEIS Section 3.15)

- There would not be any developments adjacent to the wilderness, and the 38 acres of wilderness would remain within the Bridge Creek Area and available for grazing. Impacts would be like those under Alternative 1.

Wilderness Study Areas (WSA) (FEIS Section 3.16)

- Under this alternative livestock grazing would exceed the estimated carrying capacity and increase livestock AUMs above what was authorized in 1976. This would require the proposed management to meet an exception to the non-impairment standard. However, unlike under Alternative 2, this alternative is not expected to meet the exception as grazing management would not be as likely to improve ecological conditions and naturalness.
- More impacts are expected to wilderness characteristics under this alternative as AUMs would be increased within the WSA, grazing management would not have a general grazing rotation, and the Bridge Creek riparian corridor would be made available to grazing.
- Under this alternative, a new fence approximately 3.42 miles long would be constructed within the Bridge Creek WSA which would affect naturalness on 205.2 acres of the WSA.
- Naturalness under Alternative 3 would be negatively affected on a net of 144.6 acres within the Bridge Creek WSA, which is approximately 1 percent of the total WSA area.
- Without having a general grazing rotation that specifies which grazing treatments would typically be used, it is difficult to estimate what the direct effects of grazing would be on ecological conditions, even with the utilization thresholds in place. However, the requirement that grazing continue to achieve S&Gs, or not be a causal factor in not achieving S&Gs, would be expected to protect the WSA from negative impacts to ecological condition and associated naturalness, though conditions would have the highest risk of negative impacts under this alternative.

D. The Reasons BLM did not Select Alternative 4 are:

- There would be continued complexity in the management of public land due to land ownership boundaries.
- Inability to utilize adaptive management and flexibility in grazing management due to restrictive terms and conditions.
- This alternative would not help meet the intent of Secretarial Order 3419.

Grazing Management (FEIS Section 3.6)

- Under this alternative livestock would be present within each allotment for a shorter period, and utilizing fewer AUMs, resulting in the permittee having to find additional forage for livestock or reduce livestock numbers.
- Overall, grazing management under this alternative would be more difficult than under other grazing alternatives due to the decreased season of use and limitations on the ability to have a grazing rotation that covers multiple treatments.

Vegetation/Annual Grasses/Fuels (FEIS Section 3.13)

- Under this alternative there would be less defoliation or stress to the forage vegetation because of grazing.
- There would be less biomass removed by livestock contributing to an accumulation of fine fuels in the base of the bunchgrasses that could put them at a higher risk for burning hotter if there was a wildfire.

- Non-renewable AUMs would not be authorized. If there is a productive vegetation year, without the ability to authorize NR AUMs as described in Alternatives 2 and 3, fine fuel accumulation in the grass plants would remain into the following grazing seasons and increase the risk of catastrophic fire that could affect the future resilience of bunchgrasses in the allotments. This impact would be more than under all other grazing alternatives.
- Over time this accumulation of fine fuel would reduce vigor and production of grasses (perennial and introduced) over the long term for all allotments. The future level of forage under Alternative 4 would be expected to be reduced due to shading and there would be an increased risk of fire severity, should it occur.

Greater Sage Grouse (FEIS Section 3.7)

- Grazing utilization would have a threshold of 30 percent, as well as a reduction in permitted AUMs, and a reduction in the annual authorization of AUMs in the Mud Creek and Hardie Summer Allotments, where ecological objectives are not being achieved. While this level of utilization would maintain residual fall bunchgrass and increase the vigor of perennial bunchgrasses and forbs (Austin 2000), over time, utilization levels of 30 percent or lower would be expected to decrease sagebrush.
- The 30 percent utilization threshold is at the upper end of grazing management that favors grasses and forbs, and the lower end of those that favor sagebrush. Sagebrush recovery may still take place but at a much slower rate than would likely occur if competition from perennial bunchgrasses was reduced (Austin 2000).
- There would be an increase in residual fine fuels that would increase the risk of a catastrophic wildfire, which could remove the limited amount of remaining sagebrush.
- This alternative would have a slightly more negative effect on the sagebrush component of GRS habitat than would be seen under Alternatives 1–3 where higher utilization levels are allowed.

Riparian/Water Quality/Fisheries (FEIS Sections 3.10)

- Authorized livestock grazing would only occur under a defer or winter grazing treatment, therefore trampling of redds would not be expected under this alternative.
- Riparian vegetation would have short-term impacts due to livestock grazing, this alternative would still have a risk of negative impacts to habitat if grazing does not conform to the terms and conditions (which would be considered unauthorized or trespass use).
- Krumbo Creek Pasture
 - Would result in increased cattle presence within the creek during warmer periods in some years; however, the rotation of the season of use, fewer AUMs, and the year of rest would likely allow for current conditions within the creek to be maintained or improved.

Wilderness (FEIS Section 3.15)

- The 38 acres of wilderness would remain within the Hardie Summer Allotment of the Bridge Creek Area.

Wilderness Study Areas (WSA) (FEIS Section 3.16)

- This alternative would have the highest risk of catastrophic wildfire, which would be more likely to result in perennial vegetation mortality and would open the area up to increased invasion by invasive annual grasses and noxious weeds, potentially reducing the ability of the site to recover to a healthy ecological condition that benefits naturalness and supports outstanding opportunities for solitude and recreation.

IV. DECISION

In selecting the management actions for this Decision, I have considered alternatives that meet regulatory requirements, would be effective in achieving or making progress towards achieving S&Gs, while allowing for flexibility to adapt for changing atmospheric or seasonal conditions, reduce negative impacts to grazing permittees, and reduce wildfire risk to BLM-managed lands. I also considered the effects of current grazing practices and their conformance with the S&Gs as well as RMP objectives for these allotments. Additionally, I took into consideration the conditions of the natural resources as concluded in the 2023 Bridge Creek Area Land Health Assessment and Land Health determination document, the effects analysis of permitted grazing use on resources issues identified in the Bridge Creek Area Allotment Management Plans FEIS, and the comments received as part of the public comment period for the Draft EIS.

It is my Proposed Decision to approve Alternative 2 as described in Chapter 2 (Section 2.4) of the FEIS with the incorporation of goals, objectives, and actions common to all grazing alternatives (FEIS Section 2.1) and the project design elements, required design features, and best management practices (FEIS Section 2.2) which have been summarized below) in this document. The Proposed Decision would approve terms and conditions for 10-year grazing permits for the Hammond, Mud Creek, Hardie Summer, and Hammond FFR allotments and approve the AMPs for those allotments, including provisions for livestock grazing management, and approve range improvements, specifically the Bridge Creek water gap extension, fence removal, fence construction, and maintaining spring and pipeline developments. All range improvements will be constructed outside of Wilderness and WSAs except for the Bridge Creek water gap extension, which qualifies for an exception to the WSA non-impairment standard (FEIS p. 3-202). The implementation of these actions is expected to result in S&Gs continuing to be achieved, or if not achieved, should ensure that livestock are not a causal factor.

A. Permit Issuance

Under this decision, the BLM will authorize a season of use for each allotment as described below, implement livestock grazing systems that ensure periodic growing season rest in all pastures, and allow flexibility to meet resource needs, such as early use of annual grasses and adaptive management thresholds and responses. The mandatory terms and conditions are shown in Table 2.

This decision will result in an increase in the number of AUMs permitted within the Hammond Allotment, based on previous carrying capacity calculations. The number of AUMs available for grazing was determined to be 1,971 AUMs. The number seen in Table 18 (in FEIS Section 2.8 Comparison of Alternatives) is less than 1,971 due to the adjustment of pasture boundaries. The 2005 Steens CMPA RMP/ROD (Bureau of Land Management 2005a: RMP-47) states “Interim

and long-term grazing management and stocking levels are adjusted in accordance with results of monitoring studies, allotment evaluations, and rangeland health assessments.” This increase will only occur within crested wheatgrass seedings. Non-renewable AUMs will be authorized separately and will be in addition to the active use AUMs shown on the grazing permit.

This decision will result in no change to AUMs within the Mud Creek Allotment.

This decision will result in a decrease of 44 AUMs within the Hardie Summer Allotment due to adjustment of allotment and pasture boundaries described in the Pasture/Allotment Boundary Adjustment Section below. This is an administrative adjustment, and it does not result in more AUMs being permitted on the land than had been previously within the current allotment.

This decision will result in an increase of 44 AUMs within the Hammond FFR Allotment due to adjustment of allotment and pasture boundaries described in the Pasture/Allotment Boundary Adjustment Section below. This is an administrative adjustment, and it does not result in more AUMs being permitted on the land than had been previously within the current allotment. 44 AUMs will be moved into the Hammond FFR Allotment from the Hardie Summer Allotment. The remainder of the AUMs shown in Table 2 for the Hammond FFR are those that are associated with pastures currently within the Hammond Allotment that will be moved into the Hammond FFR.

Table 2: Mandatory Terms & Conditions

ALLOTMENT	CATTLE #	SEASON OF USE	% PUBLIC LAND ³ (PL)	AUMS
Hammond	134	3/1–2/28	100	1,625
Mud Creek	49	3/1–2/28	100	590
Hardie Summer	81	7/1–11/15	100	364
Hammond FFR	439	3/1–2/28	100	368

Other terms and conditions to be included in all permits are:

- The AMP, as provided for in 43 CFR 4120.2(a) (1–4) (b) (or any successor regulation or policy), is a term and condition of the permit.
- Mandatory terms and conditions shown on a grazing permit are only for public lands, not the privately controlled lands that may lie within an allotment and do not limit the use of those private lands in any way. If the private landowner chooses to graze their private lands within the allotments, outside the terms and conditions for the public land, it is their responsibility to ensure livestock remain on the privately controlled land. Any livestock on publicly managed land outside of what has been authorized may be considered unauthorized grazing use and be subject to trespass action under 43 CFR 4150.
- Actual livestock numbers may vary dependent on length of annual grazing, as long as AUMs are not exceeded within a given grazing year.

³ Until the operator to which a grazing authorization will be issued is identified, % PL cannot be calculated because it is calculated based on the forage production of lands owned or controlled by the permittee. Once forage is allocated, % PL will be calculated for each allotment, this number will be updated, along with the cattle number, as appropriate to ensure AUMs remain the same, and a term and condition identifying % PL per pasture (for billing purposes) will be added to the grazing permit.

- The BLM may adjust the annual period of use within each pasture, within the bounds of the season of use on the grazing permit and AMP.
- The BLM, in its sole discretion, may allow up to a two-week period of flexibility in the permitted season of use; this flexibility may occur both before and after the permitted season of use. This will be a non-renewable extension of the authorized season of use requiring prior approval. There is no guarantee that the BLM will authorize this period of flexibility in any given year. Total annually authorized active use AUMs will not exceed the amount permitted. Non-renewable AUMs will be authorized separately and will be in addition to the active use AUMs shown on the grazing permit.
- Actual use billing is authorized per the AMP. Permittee will submit an actual use record within 15 days after completion of annually authorized grazing per 4130.3-2(d).
- There will be a 50 percent utilization (as measured using the Ocular Landscape Appearance/Key Species Method) threshold on upland native key species and a 60 percent utilization threshold on upland desirable nonnative key species. The response upon reaching this threshold will be the timely removal of livestock. While the BLM will be responsible for monitoring, in coordination with the permittee, the permittee remains responsible for removing livestock to ensure thresholds are not exceeded, whether or not the BLM has conducted monitoring. Permittee exceedances of utilization or failure to provide actual use may result in decreased AUMs in subsequent years.
- The permittee will not place any salt or supplements (block, dry, or liquid) within 0.25 mile of a water source or riparian area, or within 1.2 miles of the perimeter of an occupied or pending lek. Permittee may place salt or supplements (block, dry, or liquid) outside of these areas. Utilizing hay as a supplement is not authorized under this term and condition and requires separate approval from the BLM on an annual basis.
- The permittee is required to maintain all developments unless there is an agreement in place documenting a development as a BLM responsibility. Prior to being issued this grazing permit, the permittee will sign an Assignment of Range Improvements Form 4120-8 (or equivalent),⁴ which identifies developments for which the permittee is responsible. Fences that separate two BLM allotments are the responsibility of both permittees unless an agreement is in place⁵ showing specific maintenance responsibility areas. Each permittee is responsible for ensuring the boundary fence is maintained prior to turning out their livestock. Maintenance activities that involve ground-disturbing activities need to be approved by the BLM prior to beginning work to allow the BLM to ensure all NEPA and policy requirements are met.
- The permittee may use active trailing/crossing, which is actively managed to avoid livestock lingering and resource concerns, through rested pastures. Upon permittee request, the BLM may authorize the permittee to use active trailing across any of the allotments to access any other allotment on the permit. Any active trailing within the permitted allotments must be documented by the permittee on the actual use form and can be monitored by the BLM.

⁴ The current List of Range Developments for allotments within the Bridge Creek Area is in Appendix F.

⁵ This agreement may be between permittees only or between the BLM and all permittees, which is preferred as it increases communication and coordination between all entities.

- The permittee will be allowed to continue to utilize open roads on BLM-managed land within the allotments, and adjacent to the allotments, in order to implement the grazing permit.
- The permittee shall provide reasonable administrative access across private and leased lands to the BLM for the orderly management and protection of the public lands (43 CFR 4130 3-2(h)).
- If the BLM determines that Standards & Guidelines (S&Gs) are not being achieved, and livestock grazing is a causal factor, the associated areas will be rested until “significant progress” (H-4180, (Bureau of Land Management 2001a)) is made toward achieving appropriate ecological objectives, as identified in Ecological Site Descriptions (ESDs), Interpreting Indicators of Rangeland Health (IIRH), and S&G/land health assessments.

Other allotment specific terms and conditions will include:

- The BLM may authorize increased AUMs on the Hammond Allotment over a 5-year period. During that period, an additional 226 AUMs will become available each year, with full implementation occurring in 2029.⁶ This increase will only occur as long as the allotment continues to meet applicable S&Gs, or livestock is not a causal factor if S&Gs are not achieved. The 226 additional AUMs are within the range of historical use, including both permitted and non-renewable AUMs. If S&Gs continue to be achieved, or livestock is not a causal factor in not achieving them, the BLM will continue authorizing these AUMs and a future AMP may analyze permanently adding this increase onto the grazing permit.
- In the Knox Spring Pasture, which contains a portion of the Bridge Creek WSA, authorized AUMs would not exceed 356, which is the level authorized during the 1976 grazing season and a grandfathered use.
- Within the Krumbo Creek #2 Pasture of the Hammond Allotment, only trailing/crossing use will be allowed to occur, following the terms and conditions outlined in FEIS Section 2.1.6 Crossing Permits, until S&Gs show “significant progress” (H-4180, (Bureau of Land Management 2001a)) toward being achieved, and the reintroduction of grazing as described in Table 3 will not impact continued progress.
- Within the Lower Field #1 Pasture of Mud Creek, utilization will begin at a 35 percent utilization threshold in the first year of grazing following issuance of a grazing permit. The BLM will adjust this utilization, up or down, based on monitoring, as described in FEIS Section 2.1.3 Adaptive Management and Flexibility.

B. Goals And Objectives for the Bridge Creek Area

Goals are broad statements of a desired outcome that is usually not quantifiable and may not have established timeframes for achievement. Objectives are a description of a desired outcome for a resource. An objective can be quantified and measured and, where possible, can have established timeframes for achievement.

⁶ This assumes implementation begins in 2026.

Upland Vegetation

- *Goal:* Manage vegetation to achieve and maintain healthy watersheds.
 - *Objective:* Maintain or increase the relative frequency of deep-rooted perennial grasses, big sagebrush, and forbs species that provide food and nesting cover for GRSG in the allotments over the next 10 years.
- *Goal:* Increase the resistance of GRSG habitat to invasive annual grasses and the resiliency of GRSG habitat to disturbances such as fire to reduce habitat loss and fragmentation.
 - *Objective:* Reduce the existing presence of invasive annual grasses over the next 10 years.

Riparian Areas

- *Goal:* Maintain or improve riparian vegetation, habitat diversity, and geomorphic stability to achieve healthy, productive riparian areas and associated structure, function, process, and products.
 - *Objective:* Achieve or maintain a rating of PFC for perennial streams over the next 10 years.
 - *Objective:* Maintain or improve riparian/wetland vegetation communities relative to ecological status and site potential over the next 10 years.

C. Livestock Grazing Management

Livestock grazing management is designed to provide periodic growing season rest for plant species. Use periods may vary annually (as determined in an annual authorization with prior BLM approval) in order to provide for recommended rest periods as described in the grazing systems shown in Tables 3 through 5, while still providing flexibility and adaptive management. Livestock numbers may vary annually as outlined under Section e. Adaptive Management and Flexibility (also described in the FEIS Chapter 2.1. Actions Common to All Alternatives); however, total permitted AUMs will not exceed those permitted on each allotment.⁷ Grazing treatments (i.e., early, graze, and defer; see FEIS Appendix E: Grazing Treatment Descriptions) are used in the grazing systems to act as guidelines. This allows for modification based on yearly variable weather conditions. Weather variation results in key forage species entering vegetative states on differing dates, annually.

While three of the four allotments will show an authorized season of use from March 1 to February 28 (a full year), that does not mean livestock will be authorized to graze within those allotments the entire year. Rather it means the BLM can utilize adaptive management, flexibility, and improved grazing rotations, as needed throughout the year and throughout the life of the grazing permit. For annual livestock authorizations, the BLM will determine specific livestock use dates for the allotments, based on the vegetative stages of key forage species, prescribed grazing treatments, and other factors impacting the allotment or permittee. These grazing systems will allow for periodic growing season rest. Implementation of adaptive management will modify the grazing systems within the terms and conditions of the grazing permits, as long

⁷ This excludes potential non-renewable (NR) AUMs, which will follow specific terms and conditions, described below.

as periodic growing season rest occurs. Prior to authorizing annual grazing (including annual livestock numbers, season of use, and AUMs within individual pastures), the BLM will consider monitoring data and current weather conditions, such as drought. This may result in changes to stocking levels and timing of grazing to best meet resource objectives. Any modifications to the grazing system will conform to the utilization threshold of 50 percent for native key forage species and 60 percent for desirable nonnative key forage species. Any modifications to grazing systems require prior BLM approval.

Table 3. General Grazing Rotation Hammond Allotment

Allotment	Pasture	Year 1	Year 2	Year 3	Year 4 ⁸
Hammond	Landing Strip #9	Early	Early	Early	Defer
	Krumbo Creek #2	Graze	Rest	Graze	Rest
	N. Dutch Oven Seeding #1	Early	Rest	Early	Rest
	Hole in the Ground #11	Graze	Rest	Graze	Graze
	Artesian #12	Graze	Graze	Graze	Rest
	Knox Springs #5	Defer	Defer	Defer	Defer
	Larkspur Reservoir #6	Defer	Defer	Rest	Defer
	Webb Springs #4	Rest	Graze	Rest	Graze
	S. Dutch Oven Seeding #10	Rest	Early	Rest	Early

Within the Krumbo Creek #2 Pasture of the Hammond Allotment, only trailing/crossing use will be allowed to occur, following the terms and conditions outlined in this decision in Section h. Crossing Permits, until riparian related S&Gs show significant progress toward being achieved, and the reintroduction of grazing as described in Table 3 will not impact continued progress; based on monitoring, as described in Section e. Adaptive Management and Flexibility.

Table 4. General Grazing Rotation Mud Creek Allotment

Allotment	Pasture	Year 1	Year 2	Year 3	Year 4
Mud Creek	Lower Field #1	Graze/Defer	Graze/Defer	Graze/Defer	Defer
	Upper Field #2	Graze/Defer	Graze/Defer	Defer	Graze/Defer

Within the Lower Pasture of Mud Creek, utilization will begin at a 35 percent utilization threshold in the first year of grazing following issuance of a grazing permit. The BLM will adjust this utilization, up or down, based on monitoring, as described in Section e. Adaptive Management and Flexibility.

Table 5. General Grazing Rotation Hardie Summer Allotment

Allotment	Pasture	Year 1	Year 2	Year 3
Hardie Summer	Bridge Creek #3	Graze/Defer	Rest	Graze/Defer
	Cabin #1	Defer	Graze/Defer	Rest
	Little Fir Creek ⁹	Rest	Defer	Rest
	Thompson	Rest	Defer	Defer

Hammond FFR is a “C” allotment with a low percentage of public lands, even after boundary adjustments. As such, the BLM will authorize the permittee to use the BLM-managed land, in

⁸ After year 4, the grazing rotation will start back at year 1.

⁹ Trailing through this pasture can occur even in rested years. Trailing will be active, though watering may occur in the creek when water is present.

coordination with any private land they control. The use of BLM-managed land is typically minimal as it tends to be located in small pieces, often on steep hillsides, and with minimal draw for livestock. Use of BLM-managed land within the FFR will continue to meet applicable objectives, and any authorized grazing use upon the public lands will conform to meeting the utilization threshold of 50 percent on native key forage species and 60 percent on desirable non-native key forage species, as well as following other thresholds and responses as described in Section e. Adaptive Management and Flexibility. Pastures that are moved to the FFR will not receive less monitoring than currently occurs but will be more properly classified as “C” pastures due to their low percentage of BLM-managed land. Only BLM-managed land must be managed consistently with the BLM grazing permit; additional use on private land will occur at the discretion of the private landowner.

The BLM will not authorize supplemental feeding of hay in any of the allotments.

Non-renewable (NR) Grazing

The BLM may authorize NR AUMs within the Hammond, Mud Creek, and Hardie Summer Allotments upon request of the permittee and where utilization after permitted use is less than 35 percent. The BLM will not authorize NR grazing within the Lower Pasture of the Mud Creek Allotment, Krumbo Creek Pasture of Hammond Allotment, or the Hammond FFR. The objective of NR grazing will be to utilize biological thinning by livestock to address the additional grass and fine fuels that build up in years of above average production while providing additional forage for the permittee. The BLM may authorize NR grazing on an annual basis under 43 CFR 4110.3-1(a) and 4130.6-2. BLM’s prior approval will be required for any authorized NR grazing, and the BLM will bill the permittee for the NR AUMs at the standard rate along with the permittee’s actual use. The permittee will be responsible for timely and accurately reporting actual and NR use. The following terms and conditions will apply to NR grazing:

- The BLM will only authorize NR grazing following use of all permitted AUMs within the allotment, or portion of the allotment, the permittee is authorized to use.
- The BLM will only allow NR grazing when perennial bunch grasses are dormant, generally between July 15–February 28.
- The BLM will only authorize NR grazing in pastures where utilization levels following permitted use are 35 percent or less.
- The BLM will only authorize NR grazing up to the 60 percent utilization threshold for crested wheatgrass and the 50 percent utilization threshold for native vegetation.¹⁰ Utilization calculations will include both permitted use and wildlife use. When pasture utilization reaches the utilization threshold, the permittee will be required to remove livestock in a timely manner. While the BLM will be responsible for monitoring, in coordination with the permittee, the permittee will remain responsible for removing livestock to ensure thresholds are not exceeded, whether the BLM has conducted monitoring. Permittee exceedances during NR use or failure to provide actual use may result in the loss of NR use in the subsequent years.

¹⁰ Utilization is used as a threshold for NR grazing because the number of AUMs available for removal prior to utilization reaching the 50 percent utilization threshold varies year to year due to fluctuating production. Allowing NR grazing to adapt to current year conditions provide better flexibility to meet resource objectives and ensures overuse does not occur.

- NR grazing will not be authorized in more than one-half of the pastures within an allotment in any given year.
- NR grazing and targeted grazing (carefully controlled grazing by livestock to accomplish specific vegetation management objectives) will not be permitted in areas failing to meet Standards for Rangeland Health due to livestock grazing. Rangeland Health Standards and Guidelines also apply to NR grazing use and targeted grazing.
- The permittee(s) must report NR grazing on the actual use form and mark it as NR grazing. The permittee(s) will pay for these AUMs at the standard rate.
- The BLM will not authorize any NR grazing within Steens Mountain Wilderness.

D. Developments¹¹

All developments will follow required design features (RDFs), best management practices (BMPs), and project design elements (PDEs) as described in Section i.

Water Gap Modification

At the Bridge Creek water gap, the existing fence and topography have been found to be ineffective at fully keeping livestock from entering the Bridge Creek drainage. Therefore, an extension of the existing fences, 0.02-mile-long, will be added to connect the two fences on the west side of the water gap. On the east side of the water gap, a new fence, 0.18-mile-long, will be constructed across the creek to fully prevent livestock from travelling along the Bridge Creek drainage. These fences will both be constructed in the Bridge Creek WSA. See Map B – Grazing Allotments & Developments.

Fence Removal

Within the Hammond Allotment's Krumbo Creek #2 Pasture all interior fences, approximately 5.3 miles, will be removed. These fences are no longer functional or needed. Within the Hardie Summer Allotment's Cabin Pasture #1 all the BLM interior fences, approximately 2.85 miles, will be removed. See Map B – Grazing Allotments & Developments.

On the boundary of the current Hardie Summer Allotment's Sylvies Pasture¹² and Frazier Field Allotment's Old Frazier Field Pasture, two portions of the boundary fence will be relocated to the BLM-private property boundary. The first portion will be in T. 32 S., R. 32.75 E., sec. 33 NENE. This will result in the removal of approximately 0.35 miles of fence. The second portion will be in T. 32 S., R. 32.75 E., sec. 33 NWSE and will remove approximately 0.14 mile of fence that is currently located within the Steens Mountain Wilderness.

Fence Construction and Boundary Adjustment

Within the Hardie Summer Allotment, approximately 4.91 miles of fence will be constructed. One new fence, approximately 1.56 miles long, will be constructed along the rim north of Little Fir Creek. Where possible, the contour of the rim will be used instead of constructing a fence, which might reduce the amount of fence needed. This fence will extend east from the north-south

¹¹ Developments will be completed by the BLM, permittee, or in cooperation with each other and may be done using BLM, permittee, or contracted labor. Any developments needed to implement grazing will be completed prior to grazing being authorized. Any developments completed or paid for, in full or part, by the permittee will include a signed Cooperative Range Improvement Agreement, Form 4120-6, between the BLM and permittee prior to work occurring.

¹² The Sylvies Pasture will become part of the Hammond FFR.

fence of the Hammond FFR's Mud Creek Pasture to the public land-private land boundary. Another new fence will be constructed at this point. That fence will go north following the land ownership boundary, until it reaches the existing fence. From the eastern end of the Little Fir Creek fence, a new fence will extend south, following the land ownership boundary, until it connects to the existing fence on the Cabin Pasture boundary. This section of fence (going north and south from the junction with the Fir Creek fence) will be approximately 1.35 miles long (see Map B). This fence will be located outside of WSA and lands with wilderness characteristics (LWC).

Another new fence will be constructed along the public land-private property boundary in section 27. This fence will extend the existing fence between the Hardie Summer Allotment and the Hammond FFR's Mud Creek Pasture south. The fence will turn east halfway through section 27, continuing to follow the land ownership boundary. The fence will then turn north, still following the land ownership boundary, until it ties into an existing fence. This fence will be approximately 2.0 miles long. None of this fence will be within, or on the boundary, of a WSA or LWC. This fence will border the Fir Grove Area of Critical Environmental Concern; however, no trees will be removed during construction or utilized as part of the fence. See Map B – Grazing Allotments & Developments.

On the boundary of the Hardie Summer Allotment's Sylvies Pasture and Frazier Field Allotment's Old Frazier Field Pasture two portions of the boundary fence will be relocated to the BLM-private property boundary. The first portion will be relocated in T. 32 S., R. 32.75 E., sec. 33 NENE and sec. 34 NW. This relocation will result in the construction of approximately 0.84 miles of new fence. The net increase in fence due to this relocation will be approximately 0.5 miles. The second portion will be reconstructed in T. 32 S., R 32.75 E., sec. 33 SE and will follow the BLM Steens Mountain Wilderness and private property boundary and will result in approximately 0.36 mile of new fence being constructed. This will be a net increase of approximately 0.22 miles of new fence being constructed adjacent to the Steens Mountain Wilderness. An agreement with the adjacent landowner will be required prior to implementation, as this fence will be located outside of the Steens Mountain Wilderness.

As fences are constructed and removed, the BLM will adjust allotment and pasture boundaries as described below. When possible, the new fences will follow the land administration boundary; however, they will follow landscape contours rather than property boundaries, where practical. Fences will not be placed on private property unless a cooperative range improvement agreement is reached by both the private landowner and the BLM. All fences are located outside of WSA and LWC. Fences will be placed within one-quarter mile of the location identified in Map B – Grazing Allotments & Developments.

In addition to changing fences, the BLM will move some pastures, and their associated AUMs, to different allotments. The Knox Pond, Baca Lake, and Kern Reservoir Pastures will all be removed from Hammond Allotment and added to the Hammond FFR Allotment.¹³ In the Hardie Summer Allotment, the North and Sylvies Pastures will also be moved into the Hammond FFR.¹⁴

¹³ As these pastures currently include part of the Hammond Allotment crested wheatgrass seedings, the portion of AUMs associated with these pastures, will also be moved into the Hammond FFR.

¹⁴ This will also result in the 44 AUMs associated with these pastures being moved into the Hammond FFR.

In addition, the private land within the Hardie Summer Cabin Pasture will be fenced out of the allotment (as described above) and moved into the Hammond FFR. Dust Bowl #1 Pasture in the Hammond FFR will be completely removed from any BLM allotment as there is almost no BLM-managed land (0.072 acre) currently within that pasture.

These changes account for the AUM increase in the Hammond FFR from 32 to 368 AUMs and the decrease in AUMs in the Hardie Summer Allotment from 407 to 364 AUMs. In addition, the 39 acres of Steens Mountain Wilderness currently located in the Hardie Summer Allotment's Sylvies Pasture will be moved into the Frazier Field Allotment's Old Frazier Field Pasture, which already contains additional acres of designated wilderness. An additional 84.6 acres of BLM-managed land with no special designation will be moved into the Frazier Field Allotment's Old Frazier Pasture. Due to the small amount of acreage being moved, there will be no transfer of AUMs between the two allotments. See Map B – Grazing Allotments & Developments.

Range Development Maintenance

Maintenance of all developments will occur as needed to ensure the continued functioning of water developments and seedings. Water development (reservoir/waterhole/spring) maintenance will include (but is not limited to) repairing dams, adding bentonite, and removing sedimentation. Pipeline maintenance will include replacement of buried pipeline and troughs. Fence maintenance may include reconstruction of braces, rock jacks, rock cribs, and gates, as well as wire and post replacement. Equipment used for maintenance may include large-tracked vehicles such as an excavator, or rubber-tired vehicles such as a backhoe. Seeding maintenance may include reseeding of crested wheatgrass and brush beating. All maintenance activities will occur within the original construction footprint of the development. Unless otherwise stated, the permittee is responsible for range development maintenance. Removal of vegetation during these activities will be restricted to the smallest amount required to maintain the developments. See Map C – Current Grazing Allotments & Developments for specific locations of existing developments.

E. Monitoring

Monitoring activities will only apply to BLM-managed land within the Bridge Creek Area. Throughout the 10-year grazing permit term, following this ROD, both short-term indicators (measurements) and long-term indicators of communities will be monitored. If livestock grazing occurs, short-term indicators will be used to provide necessary information to determine whether the current season's livestock grazing is meeting objectives and what adjustments are needed for future grazing. Long-term indicators provide data to assess the current condition, trend condition, and trajectory of vegetative communities and/or stream characteristics (Bureau of Land Management 2011a). For both uplands and riparian areas, short-term indicators must be used in combination with long-term indicators to identify cause and effect relationships and assess progress towards meeting goals and objectives (Bureau of Land Management 2011a; Bureau of Land Management 2017b). The short-term indicators need to be compared to trend over time for validation. Using short-term indicators, such as stubble height, without any long-term monitoring, is unreliable and inaccurate as they are not resource objectives (Clary and Leininger 2000; University of Idaho Stubble Height Review Team 2004; The Stubble Height Review Team 2006), as is taking action based on a single evaluation, especially when the result is near a management standard or threshold. Short-term indicators will be paired with long-term indicators

to reduce the potential for measurement error (Krebs 1989; Ramsey et al. 1992; Roper et al. 2002). In summary, the BLM uses short-term monitoring, in combination with long-term trend monitoring, to adaptively manage livestock grazing (see Adaptive Management section below).

Monitoring, by the BLM staff¹⁵ in coordination with the permittee(s), will take place within the allotments. All monitoring within the AMU and Steens CMPA will follow the direction provided in the AMU Monitoring Plan (Bureau of Land Management 2008b), or subsequent plan, and the 2005 AMU and Steens CMPA RMPs (Bureau of Land Management 2005b; Bureau of Land Management 2005a), as amended by the 2015 Oregon GRSG ARMPA/ROD (Bureau of Land Management 2015a), as appropriate. See Map D – Bridge Creek Area Monitoring Plot Locations for location of current monitoring.

Upland Vegetation Monitoring

- *Short-Term Monitoring*

Key Species Method is used on a landscape (pasture) scale for pasture utilization (Utilization Studies and Residual Measurements, TR 1734-3; Cooperative Extension Service 1999). The target utilization levels for key forage plant species are no more than 50 percent utilization¹⁶ on key native upland perennial species and 60 percent utilization on desirable nonnative species, such as crested wheatgrass (AMU and Steens CMPA RMPs, p. 54; (Bureau of Land Management 2005b; Bureau of Land Management 2005a)). Utilization monitoring is performed along a route transect by vehicle, foot, and/or horseback. Utilization routes are in areas livestock are able to access, with utilization points occurring at a set interval specific to the route. At each utilization point, an ocular estimate of utilization is made. Since these points are on an interval, they may fall in areas of higher-than-normal use (near water or salt), or in areas of lower-than-normal use (further from water or salt). All utilization points are then averaged across the pasture and overall utilization is calculated on a pasture average basis. Utilization data will be collected annually at the end of each grazing period as labor, access, and funding allow. If livestock grazing exceeds utilization thresholds, allowable AUMs may be reduced the following year. Compliance monitoring may occur anytime during the grazing season to ensure thresholds are not exceeded.¹⁷

¹⁵ While monitoring will occur on the allotments, the extent and timeliness of it will depend on internal BLM factors such as funding and workforce and may not occur exactly when planned. In any case, permittees are responsible for removing livestock prior to exceeding utilization levels.

¹⁶The BLM Burns District measures utilization percentage using an ocular method, not a weight method. Jansen and others (Jansen et al. 2022), Figure 3 demonstrates that utilization readings using the Landscape Appearance (ocular) Method are consistently higher (and more accurate across broad ranges of grazing intensities) when compared to utilization data collected using Paired Plots and the Height-Weight methods, where plots are physically clipped and measured. The Bridge Creek Area AMP and RMPs (Bureau of Land Management 2005b; Bureau of Land Management 2005a) recommend using Landscape Appearance as the predominant method for collecting livestock utilization data, based on Jansen and others (Jansen et al. 2022) and professional judgement from Burns Range Management Specialists, as it is a conservative measure of utilization when compared to the collection by weight method. Clipping and weighing is not appropriate to use for extrapolation to a large area with variable vegetation. In most areas, the variability in production between samples requires a large number of samples to detect reasonable levels of change (Cooperative Extension Service 1999b). Additional limitations to the Double-Weight sampling technique can be found on page 102 in Technical Reference 1734-4. In addition, collecting site-specific data through clipping and weighing on large tracts of land, such as the Bridge Creek Area will be infeasible due to cost and labor limitations.

¹⁷ Annual grazing will be authorized with a term and condition that requires the permittee to ensure livestock grazing is removed prior to exceeding threshold limits. It is the permittee's responsibility to remove livestock prior to a threshold being exceeded. However, compliance monitoring may occur anytime during the grazing season to ensure thresholds are not exceeded.

Photo monitoring provides visual records of utilization levels that can be used before, during, and after grazing. At each photo point, landscape photos will be taken in each cardinal direction. A minimum of two photo monitoring points will be established in the interior of each grazed pasture. This monitoring will occur at least following grazing for the first four years following the issuance of a grazing permit. After the first four years, photo monitoring will occur at least every 5–10 years, though may occur more often as needed.

Visual Obstruction Reading (VOR) may be completed using the Robel Pole Protocol, Version 1.0 (Bureau of Land Management 2016d), in the Lower Field of Mud Creek if livestock grazing occurs within this pasture prior to June 30 as a possible tool to help document vegetative cover remaining for wildlife (sage-grouse) after livestock use. VOR monitoring may be completed in the year before grazing occurs to establish a baseline. If the results are under 7 inches while livestock are still present, then livestock will be removed from the area. Following livestock grazing, if VOR is less than (shorter than) 7 inches, grazing the following year will be reduced and the set utilization level will be decreased by 5 percent. Following livestock grazing, if results are over (more than) 7 inches following grazing, then the next year grazing will increase, and the utilization level may be increased by 5 percent if professional judgement deems an increase can be made without the VOR reading decreasing below the 7-inch mark. The increase in utilization will not exceed the utilization thresholds of 50 percent on natives and 60 percent on desirable non-natives. Permitted livestock grazing AUMs will not exceed permitted levels. These adjustments will continue annually until this monitoring provides support for a set utilization and AUM level in the Lower Field pasture that will indicate that cover requirements for GRSG are being met while allowing livestock use consistent with meeting cover requirements.

Use supervision/compliance monitoring is completed by the BLM and occurs to ensure permittees are in compliance with the terms and conditions of their permits (livestock only present if permitted, in the right locations, etc.). This monitoring includes observations about vegetation, livestock, wildlife, developments, and public land visitors to be made, allowing for a thorough overview of the pasture and potential issues, which can help guide future actions.

Actual use reporting is due from permittees within 15 days of end of season livestock removal from BLM-managed land. The BLM requires actual use to be submitted on an allotment or pasture basis. The Actual Use Form (4130-5) is used by permittees to document how many head of livestock they turned out and gathered from a pasture and on what dates. The BLM then uses this form to calculate the number of AUMs used within that pasture and within the allotment and combined with other relevant information, to plan for the next year's livestock grazing.

- *Long-Term Monitoring and Upland Assessment* Pace 180° (Bureau of Land Management 1985: 44; Johnson and Sharp 2012) will be used to assess trend in upland condition. This method is a step-transect that allows measurements of occurrence of key forbs, shrubs, and perennial grass species

composition, as well as basal cover calculations. Photos are taken, and a Soil Surface Factor form to assess soil stability and an Observed Apparent Trend form to assess trend in condition are completed. A modified Pace 180° method will be completed to include line-point intercept readings and allow a better calculation for vegetative cover. These plots will be read in years 1, 3, and 5 after grazing is reinstated. After year 5, this monitoring will be read approximately every 5 to 10 years.

Terrestrial Assessment, Inventory, and Monitoring (AIM) in this area is part of a larger district-scale AIM project that was designed to conform to the GRSG Monitoring Framework, p. D-1.¹⁸ The original AIM project was initiated in 2015 and completed in 2020, though new plots continue to be added to address specific needs. The second phase of this project is the revisitation of plots, which is expected to occur between 2025 and 2030. Habitat Assessment Framework (HAF) analysis, which considers GRSG ARMPA habitat objectives (Bureau of Land Management 2015a), uses AIM data that has been collected at the mid-, fine-, and site-scales to complete HAF suitability determinations for the Steens-South Pueblos fine-scale analysis area and the BLM HAF summary report. The BLM will continue to complete HAF requirements as required in the GRSG ARMPA (Bureau of Land Management 2015a).

Remote sensing has been completed within these allotments, providing estimates of functional group composition, bare ground, annual grasses, and juniper cover. If funding is available, remote sensing may be completed again in five to ten years, which will allow for this data to be used in determining trend.

Interpreting Indicators of Rangeland Health (IIRH; Pellant et al. 2020) assessments are typically completed on dominant ecological sites within an assessment boundary, often a pasture or allotment. The IIRH assesses the site compared to what will be expected on the site for the 17 indicators of rangeland health. The 17 indicators of rangeland health document the status of three interrelated attributes, which are soil/site stability, hydrologic function, and biotic integrity. The three attributes help land managers determine how to evaluate the ecological function of a site, extrapolate that to a larger area, and provide early warnings of potential problems or opportunities where potential risk of degradation, or resource problems may exist at the time of the assessment. Information from the applicable indicators is recorded on evaluation forms and a “preponderance of evidence” approach is utilized to determine the category for each attribute’s departure (none to slight, slight to moderate, moderate, moderate to extreme, or extreme to total departure) from the reference condition identified in the associated ESDs. This information is utilized as one part of the larger land health assessment to determine if S&Gs are being achieved. A plant list is compiled, abundance of species information is recorded, and photos of the assessment area are taken. The IIRH protocol can be found in TR 1734-6 Version 5 (Pellant et al. 2020).

While the above identifies current methods of monitoring and assessment used by the BLM, the Steens CMPA RMP/ROD makes it clear that the “list of potential monitoring methods is neither all-inclusive nor exclusive of new monitoring techniques or methodologies. Monitoring efforts

¹⁸ The Burns District AIM/HAF project was designed to be statistically valid with a minimum of 70 percent confidence at the district level.

will be implemented based upon accepted BLM technical references and accepted science research” (RMP-21, RMP-25, RMP-52, RMP-55, RMP-63). Other areas of the Steens RMP/ROD also clearly state that “monitoring methods...may include but are not limited to...” methods identified in the RMP (RMP-27, RMP-32), and methods shall be changed, removed, or added as appropriate based on resource concerns, technical references, and current science.

Riparian Area Monitoring

- *Short-term Monitoring*

Multiple indicator monitoring (MIM) (TR 1737-23): At the end of each grazing season for the first five years, short-term indicators (measurements of the current grazing season use) of stubble height, streambank alteration, and woody browse will be collected on Little Bridge, Little Fir, and Big Fir Creeks in the Hardie Summer Allotment and Krumbo Creek in the Hammond Allotment. On year five, short-term and additional long-term MIM indicators will be collected. MIM data will be analyzed to determine if livestock grazing management is aiding in moving toward or achieving riparian objectives. If objectives are being achieved, the BLM will complete short-term MIM monitoring as needed.

Use supervision/compliance: Use supervision will occur during MIM data collection and on an annual basis as staff time and funding allows. Riparian areas of perennial streams that are accessible to livestock will be checked to ensure livestock are present only in areas when and where permitted. Notes and observations will be collected on the compliance form related to condition of the creek, livestock, wildlife, public land visitors, etc. This information will be used, in addition to other monitoring, in planning grazing the next year.

Georeferenced photo monitoring: This monitoring provides visual records of utilization levels that can be used before, during, and after grazing. A minimum of two photo monitoring points will be established along each creek in the grazed pasture. Georeferenced landscape photos will be taken in each cardinal direction at each photo point. This monitoring will occur after grazing for at least the first four years grazing is resumed. After the first four years, photo monitoring will occur at least every 5–10 years, though may occur more often, as needed.

- *Long-term Monitoring and Riparian Assessment*

MIM (Bureau of Land Management 2011a): Long-term indicator measurements will be conducted on Little Bridge, Little Fir, and Big Fir Creeks in the Hardie Summer Allotment and Bridge¹⁹ and Krumbo Creeks in the Hammond Allotment approximately every five years. This data, in combination with short-term indicator data, will be used to determine if management actions are making progress toward achieving long-term goals and riparian objectives.

¹⁹ Bridge Creek MIM monitoring will be collected in a representative area within the reach between the water gap and Malheur Refuge Boundary.

Georeferenced photo monitoring: provides visual records of long-term streambank and riparian vegetative condition and trend (Bureau of Land Management 2011a). Georeferenced photos will be taken every 2-3 years at established photo point locations along Krumbo, Webb Spring, and Bridge Creeks in the Hammond Allotment, and along Little Bridge, Little Fir, and Big Fir Creeks in the Hardie Summer Allotment. Photos will be repeatable and generally taken during use supervision or end of season monitoring. Other riparian photo points will be established, as necessary.

Water temperature data will be collected using temperature probes placed in perennial streams. This data will be gathered approximately every five years. Within this 5-year time-period two to three consecutive years of data will be collected.

Aquatic AIM data will be re-collected approximately every five years and will follow the AIM National Aquatic Monitoring Framework: Lotic Field Protocol for Wadeable Systems (Technical Reference 1735-2, Bureau of Land Management 2020b). Aquatic AIM data was collected in 2019 on Krumbo, Bridge, Big Fir, Little Fir, and Mud Creeks.

Remote sensing data will be collected²⁰ within riparian areas to document indicators such as sinuosity and riparian and upland vegetation. Remote sensing will use a model to provide information along entire perennial creeks (instead of just at monitored areas) to use as a baseline for future comparison. Once baseline data has been collected, repeat remote sensing analysis will be completed every five to ten years.

PFC assessments (TR 1737-15, Bureau of Land Management 2015d): PFC assessments have been conducted on the following creeks: Krumbo, Webb Spring, Mud, Bridge, Big Fir, Little Fir, Fence, Lake, and Little Bridge. The PFC assessment synthesizes information that is foundational to determining the overall health of a riparian area. PFC assessments generally lack the sensitivity to detect incremental changes in riparian condition but can provide early warning of problems, identify key management issues, focus monitoring activities to maximize efficiency, and prioritize restoration actions on the “at-risk” systems or reaches of highest resource value. PFC assessments will be updated every 5–10 years, as needed following management changes, or when quantitative data indicates a change in condition.

F. Adaptive Management and Flexibility

Adaptive management is a system of management practices that is implemented based on clearly identified objectives (identified in relevant RMPs and the Bridge Creek Area FEIS) and monitoring to determine if management actions are meeting desired objectives and, if not, facilitating management changes that will best ensure objectives are met. Adaptive management recognizes knowledge about natural resource systems is sometimes uncertain and, in this context, adaptive management affords an opportunity for improved understanding. Due to the uncertainties inherent in managing for sustainable ecosystems, some changes in management may be authorized, which include (but are not limited to) *adjusting the rotation, timing, and annual season of use of grazing and livestock numbers*, within the constraints of the grazing permit, based on numerous factors including (but not limited to) the following—

²⁰ Dependent upon funding and contracting abilities.

- A finding that one or more standards are not being achieved, and livestock are a causal factor;²¹
- The previous year's monitoring results considering the weather conditions (temperature and precipitation);
- The current year's forecasted weather conditions;
- Persistent drought causing reduced forage production and a lack of available water in areas originally scheduled to be used;
- Occurrence of wildfire; and
- Utilization levels.

Rangeland monitoring as described above is a key component of adaptive management. As monitoring data indicates changes in grazing management are needed to meet resource objectives, changes are implemented in coordination with the grazing permittee(s). Flexibility in grazing management will be authorized and changes in rotations will only be allowed as long as they continue to meet resource objectives. Flexibility is dependent upon the demonstrated stewardship and cooperation of the permittee(s) and may occur within the terms and conditions of the grazing permit.

Thresholds, or use indicators, and responses take time to develop and validate because short-term indicators of grazing use may not reflect the meeting of long-term management objectives (University of Idaho Stubble Height Review Team 2004; The Stubble Height Review Team 2006). General thresholds and responses related to grazing management in these allotments will include those described in Table 6 and will be applied as described in the monitoring section above. These thresholds may be adjusted over time through adaptive management based on short- and long-term monitoring and assessment of objectives.

²¹ Currently, as with the previous Land Health Assessments, livestock is not a causal factor of any nonachievement of standards.

Table 6: Thresholds and Responses

ACTIVITY	THRESHOLD/USE INDICATORS	RESPONSE
Wildfire	Over 25% of acres in pasture are burnt and severity is high enough to remove existing deep-rooted perennial vegetation and require seeding.	Remove livestock grazing from burned area or temporarily fence ²² burned area to exclude livestock grazing for two growing seasons. The BLM retains discretion to close areas of any size due to fire depending on resource concerns.
Upland Grazing	50% utilization level on key native upland perennial species.	If livestock are still present when monitoring shows the utilization threshold is met, permittee will be required to remove livestock in a timely manner. Adjust livestock timing and/or duration of use for the following season. Reduce AUMs the following year if utilization is over 50%. ²³ If utilization is under 50%, consider increasing AUMs (within total permitted AUMs) or authorizing non-renewable grazing.
	60% utilization level on desirable non-native species (e.g., crested wheatgrass).	If livestock are still present when monitoring shows the utilization threshold is met, permittee will be required to remove livestock in a timely manner. Adjust livestock timing and/or duration of use for the following season. Reduce AUMs the following year if utilization is over 60%. If utilization is under 60%, consider increasing AUMs (within total permitted AUMs) or authorizing non-renewable grazing.
	The Mud Creek Allotment - Lower Field Pasture utilization threshold will be set at 35% in first season of livestock grazing. This utilization threshold will be adjustable based on VOR monitoring in future years.	If livestock are still present when monitoring shows the utilization threshold is met, permittee will be required to remove livestock in a timely manner. Adjust livestock timing and/or duration of use for the following season. If VOR after grazing is less than 7", reduce utilization by 5%. If VOR after grazing is greater than 7", increase utilization by 5% or maintain utilization levels if close to the 7" threshold. Utilization cannot exceed the standard utilization maximums for upland grazing mentioned above.
Riparian Grazing	Streambank alteration of 25% or less. ²⁴	When assessing annual use indicators and criteria and determining responses, the BLM will follow the Process for Assessing Grazing Use Criteria (Appendix D).
	Average stubble height on all key species of 6". ²⁵	
	Woody browse on willow species with a use class of "Light" (2–40%) ²⁶ or less.	

²² Construction of any exclusion fence will require additional NEPA review and a separate decision.

²³ This should not occur often as the BLM works with the permittee to monitor and livestock shall be removed prior to hitting this threshold. This response is only in case, for unforeseen reasons, this does not occur.

²⁴ Goss and Roper (2018) suggest a conservative starting point for this metric of 25%. The percentage of streambank alteration is measured within a 0.25-meter frame placed approximately every 5 meters for 40 readings per side of the bank. MIM streambank alteration data collected in 2019 along Little Bridge, Little Fir, and Big Fir Creeks indicate streambank alteration did not rise above 6.25% (Bureau of Land Management 2019a).

²⁵ "Implementing more conservative standards such as a 15-cm [6 inch] standard for stubble height seems prudent until there is sufficient site-specific data to justify more liberal standards" (Clary and Leininger 2000; Goss and Roper 2018). Clary and Leininger (2000) recommend a 10–15 cm (4–6 inch) riparian stubble height.

²⁶ Use classes are described in MIM TR 1737-23 (Bureau of Land Management 2011a: 38). The "30% of current year's growth" for woody vegetation recommended in Appendix J (J-5) of the U.S. Forest Service's PACFISH Recommended Livestock Grazing Guidelines Revision (1995) fits in and therefore supports the "light" use class prescribed here. MIM woody browse data collected in 2019 along Little Bridge, Little Fir, and Big Fir Creeks indicate woody browse did not rise above 11% or the "Slight" (0–20%) use class (Bureau of Land Management 2019a).

G. Billing

Actual use (after-the-fact) billing will be authorized as part of the new AMPs because of the variability in forage production from year to year and unreliability of some water sources. Annual grazing will be authorized through a letter of authorization prior to turnout. Accurate records will be kept by the permittee(s), and an actual use grazing report will be submitted to the BLM within 15 days after the authorized use is completed within the Bridge Creek Area allotments. If the terms and conditions of actual use billing are not met, actual use billing will no longer be allowed, and the BLM will require advanced billing for that permittee.

H. Percentage of Public Land Calculations

The percentage of public land (% PL) is determined by the proportion of livestock forage available on public lands within the allotment compared to the total amount available from both public lands and those owned or controlled by the permittee (43 CFR 4130 3-2(g)). Percentage of public land will be calculated using ecological site mapping and ESD estimates of grass and grass-like production in a normal precipitation year. Within the Bridge Creek Area, for each pasture, the number of acres in each ecological site will first be determined. These acres will then be divided into public lands and lands owned or controlled by the permittee. To determine the proportion of livestock forage, the number of acres of public lands and of lands controlled by the permittee, in each ecological site and each pasture, will be multiplied by the grass and grass-like production estimates (lbs./acre) from the associated ESD. This will result in production estimated for public lands and for lands controlled by the permittee. The sum of these two values will result in total production for that ESD within the pasture. To calculate % PL for that pasture, the sum of production on public lands, for all ecological sites, will be divided by total production, for all ecological sites, within the pasture.²⁷ These calculations will be made after the BLM identifies a qualified permittee consistent with 43 CFR 4130.1-2, as the calculations will change depending on which applicant, or combination of applicants, is selected. While this value is used in calculations on the grazing authorization, it will not result in more AUMs being authorized on BLM-managed lands. However, as % PL values decrease from 100% PL, livestock head number may increase.

I. Crossing Permits

Crossing permits, utilizing active trailing, in which livestock are pushed by a horseback rider or person on foot,²⁸ and not allowed to drift, will be authorized to occur across the BLM-managed land within the Hammond, Mud Creek, Hardie Summer, and Hammond FFR Allotments. A crossing permit does not authorize trailing across any private lands within the trailing pasture. Trailing may occur by both the authorized permittee for the allotment, or an adjacent permittee (not the authorized permittee) of the allotment. If trailing occurs by an adjacent permittee, it is their responsibility to coordinate movements with the allotment permittee to minimize conflict as much as possible. If trailing livestock get mixed in with permitted livestock, it is the trailing operators' responsibility to sort livestock and ensure all of their livestock get removed from the

²⁷ Using ESDs for this calculation allows the BLM to utilize the best available data for production on BLM- and permittee-controlled lands. The BLM understands that these production estimates may be outdated, especially in areas where fire has occurred. However, it is expected that the production patterns, based on ecological sites and site potential, will be similar and can still be used to calculate % PL. This number will be updated if better production data becomes available, and when control of land or adjustment of pasture boundaries occurs.

²⁸ The use of motorized equipment to push livestock will not be authorized in this area except in situations where the motorized equipment remains on existing roads. The CMPA is closed to all off-road vehicle use by the public.

pasture. Crossing permits will be authorized under 43 CFR 4130.6-3 and issued through the BLM Rangeland Administration System.

Trailing will be authorized mainly in the uplands (outside of riparian corridors), though crossing of riparian corridors will be permitted when needed. Trailing operators may take breaks while trailing, to allow livestock to water and allow cows and calves to find one another (pair up) before moving again. Trailing will occur along roads to the extent possible and must avoid trailing through known GRSG leks. If trailing is over four miles, the trailing operator may overnight in the trailing pasture at available water. Each trailing occurrence shall last no more than two days. No more than ten days total of trailing/crossing will be authorized within any allotment per year.

Permittee will be required to notify the BLM before starting to cross/trail and allow the BLM to monitor.

Salt, Mineral, and Protein Supplements

The BLM may authorize supplementation of salt, minerals, and protein in block, dry, and liquid form with restrictions listed in RDFs and in permit terms and conditions.

J. Project Design Elements, Required Design Features, and Best Management Practices

All developments will follow the applicable RDFs from the 2015 GRSG ARMPA (Bureau of Land Management 2015a) within GRSG habitat, as well as general PDEs and BMPs. Due to site-specific circumstances, some RDFs, PDEs, and BMPs may not apply to some projects (e.g., if a resource is not present on a given site) or may require variations (e.g., a larger or smaller protective area).

Project Design Elements

Project design elements (PDE) were developed to aid in meeting project goals and objectives. These features are nonexclusive and are subject to minor modification based on site-specific terrain characteristics (topography and vegetation). Developments will follow the PDEs outlined below. The locations of all developments are estimated locations. Exact, on-the-ground locations of any developments will be determined by the BLM prior to constructing the developments. All developments will occur within 0.25 miles of the current location. Any developments that will occur in WSAs will be required to meet an exception to the non-impairment standard and will be fully analyzed in separate documentation. The Industrial Fire Precaution Levels will be followed during construction.

- Development sites will be surveyed for cultural values prior to implementation. Where cultural sites are found, National Register of Historic Places eligibility will be evaluated, and the location of the development will be moved to avoid and prevent damage to the site. If sites are determined to be eligible for the National Register of Historic Places and the location of the development moved to avoid the site, sites will still be assessed for threats, and, if needed, measures to protect cultural materials will be determined. Site protection plans will be developed in consultation with the Oregon State Historic Preservation Office and the appropriate American Indian tribes, as necessary. Mitigation measures may include protective fencing, surface collection and mapping of artifacts,

subsurface testing, and complete data recovery (full-scale excavation). Additional effects analysis and documentation, including a decision, may be necessary, depending on the extent of the mitigation action.

- Development sites will be surveyed for BLM-designated special status plant species and federally listed threatened and endangered plants, and designated critical habitat, prior to implementation. Special status and threatened and endangered plant sites will be avoided.
- Development sites will be surveyed for noxious weed populations and invasive species prior to implementation. Weed populations identified in or adjacent to the projects will be treated using the most appropriate methods, in accordance with the decision for the Integrated Invasive Plant Management for the Burns District Revised Environmental Assessment or subsequent decision.
- Fences will be constructed to BLM specifications for a 4-strand, barbed-wire fence. Post spacing will be up to 22 feet and the maximum fence height will be 42 inches. The bottom wire will be smooth and at least 18 inches from the ground. As many as two metal or wood stays will be used in each section of fence. Posts will be standard metal posts and solid green in color. Green steel or oil field pipe braces and stretch panels may be used instead of wood braces and rock cribs when they will not affect the structural integrity of the fence. Spot removal of rocks or vegetation will only occur when necessary, during construction. Pickups or utility terrain vehicles will be used in fence construction; off-road travel will occur to haul materials. Anti-strike markers will be used as described in the GRSG ARMPA (Bureau of Land Management 2015a: 2.3.3.2 Required Design Features). The grazing permittee will be responsible for all fence maintenance.
- Areas disturbed during development construction will be seeded with native species, or desirable nonnative species (such as crested wheatgrass), where the site is outside of wilderness, WSA, and LWC and at immediate risk of annual grass invasion, to increase the rate of recovery. Only native species will be seeded within the wilderness, WSA, or LWC portions of the allotments. Seeding will be completed using an all-terrain vehicle to broadcast seed and pull chains to cover the seed, or by hand with a whirlybird, depending on the size of the disturbed area. Any seeding within WSA or LWC areas will occur by handheld or portable bag seeders. Reseeding will occur if monitoring suggests the initial seeding was not successful. Seeding will occur in the fall or winter.
- Wildlife accessibility to water will be ensured and escape ramps will be installed in all new and existing water troughs.
- New troughs will be painted a BLM standard environmental color to reduce visual contrasts. Bare metal troughs will not be allowed.
- Fuel storage cannot exceed 1,320 gallons, and spills from containers greater than 45 gallons must be cleaned up by the responsible party and are reportable by State and Federal laws without a spill prevention control and countermeasure plan submitted to the Environmental Protection Agency.

Required Design Features

These RDFs are required for certain activities in GRSG habitat. RDFs establish the minimum specifications for certain activities to help mitigate adverse impacts. Because of site-specific

circumstances, some RDFs may not apply or may require slight variations. See GRSG ARMPA²⁹ (Bureau of Land Management 2015a: C, p. C-1) for more details.

- Restrict the construction of fences and tall structures to the minimum number and amount needed (Bureau of Land Management 2015a: C, Common to All RDF 3, p. C-1).
- Remove, modify, or mark fences identified as high risk for collisions, generally within 1.2 miles of occupied or pending leks (Bureau of Land Management 2015a: 2-20, Management Decision LG 9). Refer to the model by Bryan Stevens (Stevens 2011) to identify fences that pose a threat to GRSG. Remove any unneeded or unused fences and mark needed fences with anti-strike markers if they pose a threat to the GRSG. Remove or mark fences within 1.2 miles of newly discovered leks that were not included in the model. Update the model when new leks are found in Priority Habitat Management Areas only (Bureau of Land Management 2015a: C: Common to All, RDF 5, p. C-2).
- Power wash all vehicles and equipment involved in land and resource management activities prior to allowing them to enter the project area to minimize the introduction and spread of invasive plant species (Bureau of Land Management 2015a: C: Common to All, RDF 11, p. C-2).
- Use native plant species, locally sourced where available, recognizing that use of nonnative species may be necessary, depending on the availability of native seed and prevailing site conditions (Bureau of Land Management 2015a: C: Common to All, RDF 12, p. C-2).
- There will be no disruptive activities two hours before sunset to two hours after sunrise from March 1 through June 30 within 1.0 mile of the perimeter of occupied leks, unless brief occupancy is essential for routine ranch activities (e.g., herding or trailing livestock into or out of an area at the beginning or end of the grazing season). Disruptive activities are those that are likely to alter GRSG behavior or displace birds such that reproductive success is negatively affected or an individual's physiological ability to cope with environmental stress is compromised. Examples of disruptive activities are noise, human foot or vehicle traffic, or other human presence (Bureau of Land Management 2015a: C: Common to All, RDF 19, p. C-3).
- Do not place salt or mineral supplements within 1.2 miles of the perimeter of an occupied lek (Bureau of Land Management 2015a: C: Livestock Grazing, RDF 1, p. C-6).
- Do not concentrate livestock in nesting habitat or leks from March 1 through June 30. The timing and location of livestock turnout and trailing shall not contribute to livestock concentrations on leks during the GRSG breeding season (Bureau of Land Management 2015a: C: Livestock Grazing, RDF 2, C-6).
- Fence wetlands (e.g., springs, seeps, wet meadows, and riparian areas) to maintain or foster progress toward PFC and to facilitate management of GRSG habitat objectives. Where constructing fences or enclosures to improve riparian or upland management, incorporate fence marking or other Best Management Practices/RDFs as appropriate (Bureau of Land Management 2015a: C: Livestock Grazing, RDF 5, p. C-6).

²⁹ This project will continue to follow the management direction from the 2015 Oregon GRSG ARMPA as stated on page 1-30 of the ROD for the 2025 GRSG ARMPA.

- Construct new livestock facilities, such as livestock troughs, fences, corrals, handling facilities, and “dusting bags,” at least 1.2 miles from leks or other important areas of GRSG habitat (i.e., wintering and brood-rearing areas) to avoid concentrating livestock, collision hazards to flying birds, or avian predator perches (Bureau of Land Management 2015a: C: Livestock Grazing, RDF 7, p. C–7).

Best Management Practices (BMPs) From 2015 GRSG ARMPA

The following BMPs are additional management actions and practices. They were developed from the National Technical Team Report and other sources. The BMPs are applicable to priority and general habitat management areas unless otherwise indicated.

- Use ESDs to determine appropriate seed mixes. Seed mixes shall include a diversity of forbs that maximize blooming times when pollinators are most active and include nectar and pollen-producing plants (2015a: C: Best Management Practices, Post-Fire and Restoration Seeding BMP 1, p. C–9).
- When using nonnative grasses, do not mix crested wheatgrass (*Agropyron cristatum* or *A. desertorum*) with native perennial grass species. If crested wheatgrass is needed to compete with invasive annual grasses, use a nonnative grass mix (2015a: C: Best Management Practices, Post-Fire and Restoration Seeding BMP 3, p. C–9).
- Restrict off-trail vehicle use, where authorized, to areas more than two miles from leks during the breeding season, unless travel is essential for routine ranch activities, such as repairing fence, “doctoring” livestock, and finding lost livestock (2015a: C: Best Management Practices, Livestock Grazing, p. C–11).

K. Consistency with BLM Manual 6330 – Management of WSAs

This decision involves extending the Bridge Creek water gap and removing a fence that is currently the boundary between the Hammond and Mud Creek allotments, both within the Bridge Creek WSA. None of the changes will result in a permanent increase in permitted AUMs within the Bridge Creek WSA. This decision is consistent with management direction for WSAs described below.

Bridge Creek Water Gap Extension

The extension and construction of fences within the Bridge Creek water gap will only affect naturalness in the immediate vicinity of the fence (in an area that is already impacted by the existing water gap fences) and decreasing further away from the water gap. The location of this water gap within the Bridge Creek drainage, and not blading the fence line for fence construction, will ensure that the water gap fences are substantially unnoticeable. In addition, by constructing these fences, ensuring livestock are unable to get into the Bridge Creek drainage (reducing opportunities for unmanaged livestock grazing in the area), the associated riparian area will continue to improve in ecological condition, increasing the appearance of naturalness. Maintenance for these exclosures will not require motorized equipment.

The extension of the Bridge Creek water gap and protection of the Bridge Creek drainage is consistent with exceptions to the non-impairment mandate as outlined in Section 1.6.C.2.f of the WSA Manual.

Protect or enhance wilderness characteristics or values, which states that: “actions that clearly benefit a WSA by protecting or enhancing these characteristics are allowable even if they are impairing.” Reducing the risk of livestock accessing the Bridge Creek drainage (when not authorized) will allow for associated riparian areas to be protected from over-grazing, improving their ability to function properly and enhancing ecological condition, improving naturalness in the area.

In addition, the Bridge Creek water gap extension is in compliance with Section 1.6.D.3.a.ii of the WSA Manual.

New Livestock Developments, which states that “in determining whether a development meets the protecting or enhancing wilderness characteristics exception, the BLM will determine if the structure’s benefits to the natural functioning ecosystem outweigh the increased presence of human developments and any loss of naturalness.” The BLM has determined the benefit of protecting the Bridge Creek drainage from unauthorized grazing outweighs any unnatural effects to wilderness characteristics. Naturalness in this area will be enhanced by increasing ecological functioning.

Removal of the Current Hammond/Mud Creek Boundary Fence

Removing the current Hammond/Mud Creek Boundary Fence will result in removal of 0.7 miles of fence currently within the Bridge Creek WSA and impairing a wilderness characteristic (naturalness). This action is consistent with section 1.6.B.3.b. of the WSA Manual, which allows the BLM to remove structures and other facilities impairing wilderness characteristics.

As fences can impair wilderness characteristics, specifically naturalness, removing the fence from the WSA will result in an increase in naturalness of the WSA and enhance wilderness characteristics. Since this fence removal will enhance wilderness characteristics, it is allowed under 1.6.C.2. *Exceptions to non-impairment class f. Protect or enhance wilderness characteristics or values.*

Continued maintenance of all existing range improvements is consistent with Section 1.6.D.3.a.i., which allows for maintenance activities in the same degree and manner as was being conducted on October 21, 1976.

Based on the analysis in the FEIS and consistent with BLM Manual 6330, for the reasons described above, implementing this decision is not expected to impair any of the WSAs’ suitability for preservation as wilderness, and as such will comply with Section 603(c) of the Federal Land Policy and Management Act (FLPMA).

In summary, I have determined that this Proposed Decision, which reflects the Alternative 2 analyzed in the FEIS, best minimizes effects to natural resources while providing for livestock grazing in a manner consistent with the 2005 Andrews/Steens RMPs, as amended by the 2015 Oregon GRSG ARMPA, as well as the Steens Act and BLM Manual 6330 – Management of WSAs.

V. AUTHORITY, CONFORMANCE, AND COMPLIANCE

The actions proposed in this Proposed Decision would conform to all applicable laws, policies, and the AMU and Steens Mountain CMPA RMPs/RODs, dated August 2005 (Bureau of Land Management 2005b; Bureau of Land Management 2005a), as amended by the 2015 Oregon GRSG ARMPA/ROD (Bureau of Land Management 2015a). The BLM issued the Oregon GRSG ARMPA/ROD in January 2025 (Bureau of Land Management, 2025) which updated the 2015 GRSG ARMPA/ROD. However, this decision is bound to follow the management direction from the 2015 Oregon GRSG ARMPA, for the reasons identified on page# 1-30 of the ROD for the 2025 GRSG ARMPA.

The authorities under which the portions of the decision applicable to grazing will be issued include the Taylor Grazing Act of 1934, as amended; FLPMA; Title 43 CFR Subpart 4100, Grazing Administration – Exclusive of Alaska (or any successor regulation or policy); and 43 CFR 1601.0-5(b). My final decision will be issued under the following specific regulations:

- 4100.0-8 Land use plans: The AMU/Steens CMPA RMPs and RODs designate the Hammond, Mud Creek, Hardie Summer, and Hammond FFR allotments available for livestock grazing, and the permit is in conformance with the land use plan as defined at 43 CFR 1601.0-5(b).
- 4120.2 Allotment management plans and resource activity plans. Allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans may be developed by permittees or lessees, other Federal or State resource management agencies, interested citizens, and the Bureau of Land Management.
- 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; and
- 4130.3 Terms and conditions: Grazing permits must specify the terms and conditions that are needed to achieve desired resource conditions, including both mandatory and other terms and conditions.

FLPMA provides the BLM's general land use management authority over the public lands and directs the BLM to manage those lands under principles of multiple use and sustained yield (43 CFR 1732(a)). Balanced and diverse resource uses to be managed include range, timber, watershed, and wildlife (43 CFR 1702(c)).

Multiple sections of the Steens Mountain CMPA of 2000 (Steens Act) provide direction to manage for social and ecological health, and for economic purposes, including grazing.

Multiple sections of BLM Manual 6330 – Management of WSAs are directly relevant to the actions discussed within the Bridge Creek Area AMP FEIS ROD and address grazing and range improvements within WSAs.

The Proposed Decision conforms to the following documents, which direct and provide the framework for management of BLM lands within Burns District:

- Taylor Grazing Act (43 United States Code (U.S.C.) §§ 315–315r).
- NEPA (42 U.S.C. §§ 4321–4347).
- 516 Department Manual 1 U.S. Department of the Interior Handbook of NEPA Implementing Procedures (43 CFR Part 46).
- FLPMA (43 U.S.C. §§ 1701–1787)
- The Wilderness Act (16 U.S.C. §§ 1131-1136), as amended.
- The Steens Mountain Cooperative Management and Protection Act of 2000 (16 U.S.C. §§ 460nnn–460nnn-122).
- Public Rangelands Improvement Act (43 U.S.C. §§ 1901–1908).
- The National Historic Preservation Act (54 U.S.C. §§ 300101–307108).
- State Protocol Between the Oregon-Washington State Director of the BLM and The Oregon State Historic Preservation Officer Regarding the Manner in Which the Bureau of Land Management Will Meet Responsibilities Under the National Historic Preservation Act and The National Programmatic Agreement Among the BLM, the Advisory Council on Historic Preservation and The National Conference of State Historic Preservation Officers, 2015.
- Standards for Rangeland Health and Guidelines for Livestock Grazing Management for Public Lands Administered by the BLM in the States of Oregon and Washington, August 12, 1997 (Bureau of Land Management 1997a).
- Integrated Invasive Plant Management for the Burns District Revised Environmental Assessment (DOI-BLM-OR-B000-2011-0041-EA), 2015 (Bureau of Land Management 2015b; Bureau of Land Management 2015c).
- The GRSG Land Use Plan Implementation Guide, 2016 (Bureau of Land Management 2016a).
- Washington Office (WO) Instruction Memoranda (IM) 2016-139, Policy for Resource Management Plan Effectiveness Monitoring for Renewable Resources with Additional Guidance for Plans Implementing the Greater Sage-Grouse Conservation Strategy (Bureau of Land Management 2016b).
- WO IM 2018-22, Process for Evaluation Greater Sage-Grouse Land Use Plan Adaptive Management Hard and Soft Triggers (Bureau of Land Management 2017a).
- WO IM 2016-145, Tracking and Reporting Surface Disturbance and Reclamation (Bureau of Land Management 2016c).
- BLM Manual 6330 – Management of WSAs, 2012 (Bureau of Land Management 2012a).
- BLM Manual 6340 – Management of Designated Wilderness Areas, 2012 (Bureau of Land Management 2012b).
- BLM Manual 9015 – Integrated Weed Management (Bureau of Land Management 1992).
- Oregon Revised Statute 537.141 Uses of water not requiring water right application, permit or certificate.
- All other Federal laws that are relevant to this document, even if not specifically identified

VI. RIGHT OF PROTEST

Any applicant, permittee, lessee, or other interested public 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:

Donald Rotell
Burns District Manager
Burns District BLM
28910 Hwy 20 W.
Hines, OR 97738

Any protest filed should clearly and concisely state the reason(s) why the proposed decision is in error. The BLM will only accept a protest that is filed in hard copy, the BLM will not accept an electronically transmitted (e.g., email, facsimile, or social media) protest. The BLM cannot accept electronic filing of electronic protest documents (e.g., compact discs, DVDs, thumb drives, etc.) due to the Federal Information Systems Security Awareness policies. Protests must be printed or typed on paper and submitted in person or by mail.

Per 43 CFR 4160.3(a), in the absence of a protest, the proposed decision will not become the final decision of the authorized officer. A final decision will be issued after the protest period concludes, whether or not a valid and timely protest is received.

Signature:

Donald Rotell
Burns District Manager
Bureau of Land Management

Date

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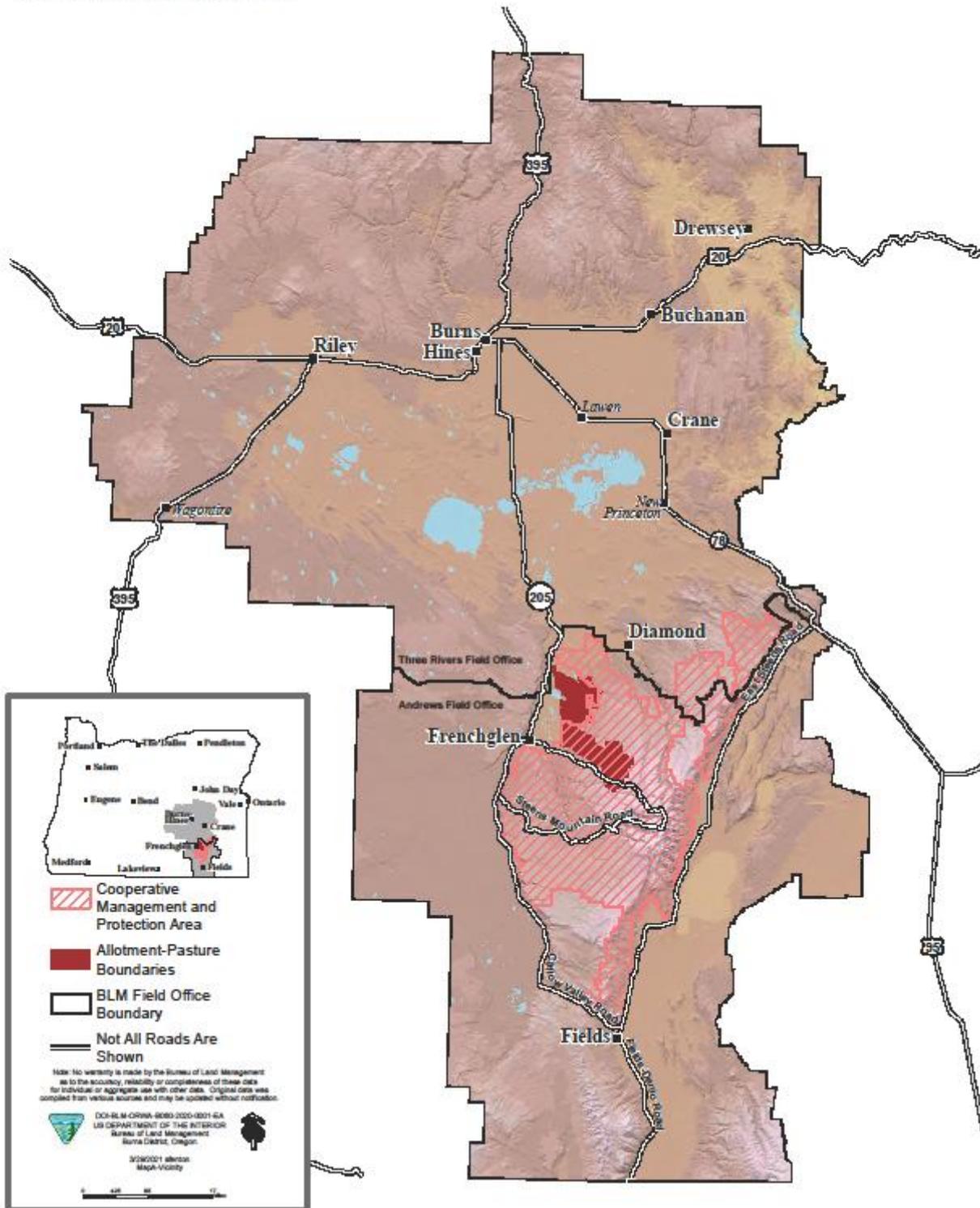
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MAPS

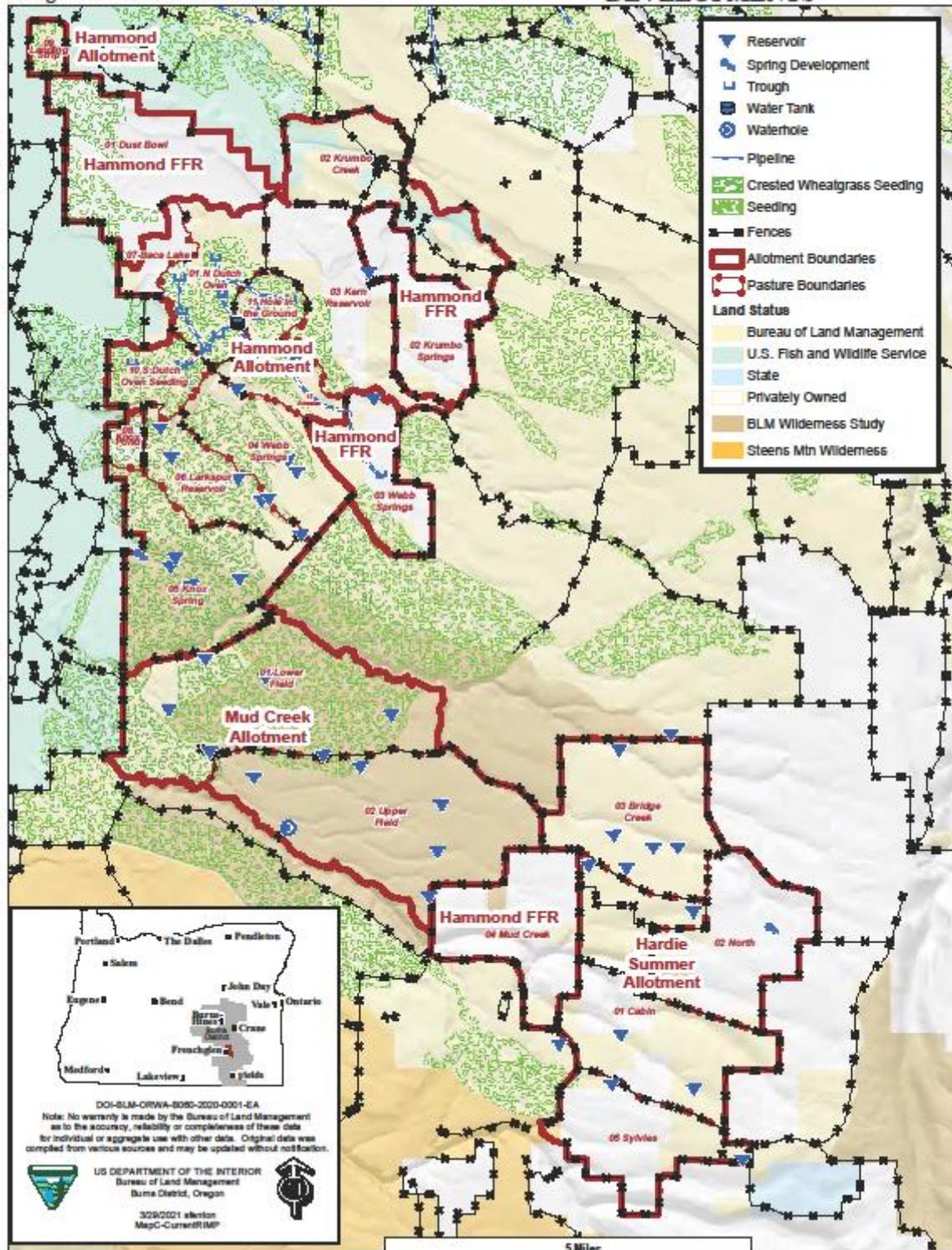
Map A
 Bridge Creek Area AMP ROD

VICINITY



Map C
Bridge Creek Area AMP ROD

CURRENT GRAZING ALLOTMENTS & DEVELOPMENTS



Map D
Bridge Creek Area AMP ROD

BCA Monitoring Plot Locations

