



OWYHEE COUNTY BOARD OF COMMISSIONERS  
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March 11, 2013

Chairman Gene M. Gray  
Boise District RAC  
2393 Watts Ln  
Payette, Idaho 83661

Dear Chairman Gray:

Owyhee County is requesting that the Boise District Resource Advisory Council (and others RACs as appropriate) conduct a comprehensive review of the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management (ISG).

The ISG were developed cooperatively by the Idaho Resource Advisory Councils in 1997. The grazing regulations and most BLM land use plans require that permitted grazing use and authorizations comply with the ISG. BLM in their capacity of administering grazing use of the public land is charged with implementing the ISG. We have now had 15 years of experience with application of the ISG through the renewal of grazing permits. It has become clear that while some of the direction in the ISG is useful, some elements of are so ambiguous, academic and impractical that the ISG are not accomplishing the intended purpose. More importantly, the ISG as written have created or contributed to substantial conflict and litigation that has prevented BLM from meeting their obligation to effectively administer and manage grazing use of the public lands.

Grazing permit renewal has become a mere administrative paperwork task instead of a process for developing and implementing grazing management strategies that effectively comply with ISG objectives. The inability of BLM to successfully respond to multiple legal challenges and losses in court is due in significant part to the ambiguity and inconsistency of ISG interpretations and application within the agency.

It is now time to revisit the ISG and clarify, correct or modify the language and elements of the ISG that have proven unworkable in practice. The shortcomings of the ISG stem from many factors including but not limited to the following:

Academic descriptions of standards which are not measurable,

Ambiguous relationships between standards and indicators,

Lack of defined threshold for meeting standards relative to management objectives,

Failure to apply appropriate and consistent assessment and determination protocols,

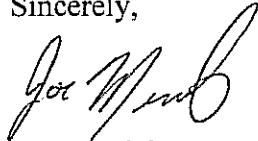
Lack of effort to conduct and utilize Cooperation, Coordination, and Consultation with RAC, affected grazing permit holders and others for assessments, determinations, and decisions.

Lack of standardized meaningful definition of terms,

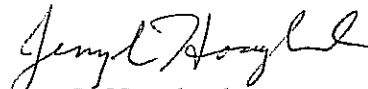
Failure to consistently apply the ISG among districts and field offices.

We are requesting that the Boise District RAC take up this matter immediately and initiate a review that includes all stakeholders and particularly non agency scientists. We appreciate your consideration in the request and look forward to your response.

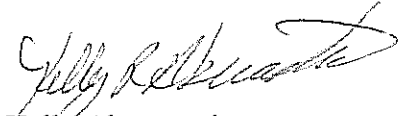
Sincerely,



Joe Merrick  
Chairman



Jerry L. Hoagland  
Commissioner



Kelly Aberasturi  
Commissioner