

Bureau of Land Management

Safford Field Office

Safford, AZ



Environmental Assessment
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Sheepskin Wash and Wiregrass Lake Allotments
Grazing Lease Renewal EA

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

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1.0 Introduction

This Environmental Assessment (EA) has been prepared by the Bureau of Land Management (BLM) to analyze the potential impacts of changing the season of use and issuing two new Grazing Leases for the Sheepskin Wash Allotment No. 06084 and the Wiregrass Lake Allotment No. 06230, both of which are managed by the Safford Field Office (SFO). Maps Available in Appendix C: Maps.

1.1 Background

The SFO has completed a Land Health Evaluation (LHE) for the Sheepskin Wash Allotment in 2021 and the Wiregrass Lake Allotment in 2020. The data presented in the LHEs demonstrated that the Arizona Standards for Rangeland Health were being achieved on both allotments. It was recommended through those evaluations that the season of use be adjusted to align with management objectives and allow for increased flexibility of management for both the BLM and lessees. The allotments being considered for this change are also comprised of State and private land which are authorized for year-round grazing through the State leases associated with each allotment.

1.2 Summary of Land Health Evaluations

The Safford Field Office (SFO) completed LHEs for both the Sheepskin Wash and Wiregrass Lake Allotments to determine whether the allotments are meeting the standards for rangeland health as described in the Arizona Standards for Rangeland Health and Guidelines for Grazing Management (USDI BLM, 1997) (“Arizona Standards and Guidelines”). The LHE report for each allotment will be summarized below and links to the full LHE report will be provided on the ePlanning website.

1.3 Sheepskin Wash Allotment

Arizona Standards for Rangeland Health are being achieved on the Sheepskin Wash Allotment for Standards 1 and 3. Riparian-Wetland Sites were not present, therefore, Standard 2 did not apply. The rationale as outlined in the LHE for Standard 1 and Standard 3 are as follows:

1.3.1 Standard 1 Rationale

Overall, the soils throughout key area SW-1 are productive, stable, and in a sustainable condition. The key area monitoring data reflects the conditions described in the Natural Resource Conservation Services’ Ecological Site Description (ESD). The data at the key area shows that canopy cover, bare ground, and litter amount are adequate to ensure soil stabilization and appropriate permeability rates within the ecological site. Bare ground was measured at 32 percent and was within the range of 30 to 50 percent as described in the ESD. Canopy cover was measured at 40 percent and litter cover was measured at 36 percent, the respected ranges as described in the ESD are 30 to 40 percent for canopy cover and 20 to 40 percent for litter cover. These indicators show that the soils are well protected and are in a sustainable condition

appropriate for the ecological site. No rills or gullies were observed and terracettes were rated None to Slight.

1.3.2 Standard 3 Rationale

Based on the monitoring data and evaluation, current livestock grazing is not preventing the Sheepskin Wash Allotment from providing a productive and diverse upland of native plant species that provides for multiple uses. The Interpreting Indicators of Rangeland Health (IIRH) assessment indicates that Soil and Site Stability, Hydrologic Function, and Biotic Integrity are meeting the standard for this site based on the evidence that the site is achieving the objectives for canopy cover, bare ground, and litter cover. Plant community composition was the only indicator that was not meeting the criteria as outlined in the ESD sheet. The interdisciplinary (ID) Team determined that the site was still functioning within its expected range despite the encroachment of Juniper trees. This Determination is supported by the observations that the soils are remaining stable and not experiencing forms of erosion due to the appropriate canopy, ground and litter covers providing protection as well as proper infiltration of precipitation.

1.3.2 Recommended Management Actions

1.) Grazing management on the Sheepskin Wash Allotment should change in accordance with the terms and conditions of the term lease, as follows:

- Mandatory terms and conditions of the lease should consider a change from the current authorized 2 cattle, with a season of use for March 1 to May 31, and November 1 – February 28 (7 Months) to the proposed yearlong season of use depicted below.

Table 1: Sheepskin Wash Recommended Management Actions

Allotment Name/Number	Livestock Number/Kind	Grazing period Begin - End	% Public Land	Active Use (AUM)
Sheepskin Wash (No. 06084)	1 Cattle	3/1 – 2/28	100	14

2.) The following Other Terms and Conditions should be added to the BLM lease:

- In order to improve livestock distribution on the public lands, all salt blocks and/or mineral supplements shall not be placed within a ¼ mile of any riparian area, wet meadow, or watering facility (either permanent or temporary) unless stipulated through a written agreement or decision in accordance with 43 CFR 4130.3-2(C).
- The lessee shall submit, upon request, a report of the actual grazing use made on this allotment for the previous grazing period, March 1 to February 28. Failure to submit such a report by March 15 of the current year, may result in suspension or cancellation of the grazing lease.
- Lessee shall provide reasonable administrative access across private and leased lands to the BLM for the orderly management and protection of the public lands.

1.4 Wiregrass Lake Allotment

Arizona Standards for Rangeland Health are being achieved on the Wiregrass Lake Allotment for Standards 1 and 3. Riparian-Wetland Sites were not present, therefore, Standard 2 did not apply. The rationale as outlined in the LHE for Standard 1 and Standard 3 are as follows:

1.4.1 Standard 1 Rationale

The soils throughout the Wiregrass Lake Allotment are productive, stable, and in a sustainable condition. The key area monitoring data reflect the conditions as described in the ESD's reference sheets and are acceptable for meeting the upland sites standard. The data at the key area shows that the canopy cover was better than expected and there was less bare ground than expected. Litter remained in place and prevalent rock cover is adequate to ensure soil stabilization and appropriate permeability rates within the ecological site. Little to no signs of erosion were observed at the site. There were no rills, gullies or terraces. A few pedestals were present but were within the reference sheet expectation. Wind-scouring was not detected. Soil surface is naturally armored by rock and canopy cover.

1.4.2 Standard 3 Rationale

The IIRH assessment indicates that Soil and Site Stability, Hydrologic Function, and Biotic Integrity are meeting the standard (as outlined in Standard 1) for this site. Data from the allotment's key area indicate that the site is achieving the objectives for canopy cover, plant community composition, bare ground, and litter cover. The vegetation composition and density are sufficient to provide forage and shelter for livestock and wildlife species. Therefore, the ID Team determined that the Wiregrass Lake Allotment is currently meeting Standard 3.

1.4.3 Recommended Management Actions

- 1.) Grazing management on the Wiregrass Lake Allotment should change in accordance with the terms and conditions of the term lease, as follows:
 - Mandatory terms and conditions of lease the lease should consider a change from the current authorized 36 cattle, with a season of use for March 1 to June 30 and February 1 to February 28 (five months) to the proposed yearlong season of use depicted below.

Table 2: Wiregrass Lake Recommended Management Action

Allotment Name/Number	Livestock Number/Kind	Grazing period Begin - End	% Public Land	Active Use (AUM)
Wiregrass Lake Allotment (No. 06230)	14 Cattle	3/1 – 2/28	100	177

- 2.) Continue with these Other Terms and Conditions:

- In order to improve livestock distribution on the public lands, all salt blocks and/or mineral supplements shall be placed within a ¼ mile of any riparian area, wet meadow or watering facility (either permanent or temporary) unless stipulated through a written agreement or decision in accordance with 43 CFR 4130.3-2(C).

3.) The following Other Terms and Conditions should be deleted as it is a duplicate of the Standard Terms and Conditions associated with this BLM lease:

- If in connection with allotment operations under this authorization, any human remains, funerary objects, sacred objects or objects of cultural patrimony as defined in the Native American Graves Protection and Repatriation Act (P.L. 101-601; 104 Stat. 3048; U.S.C. 3001) are discovered, the Permittee shall stop operations in the immediate area of the discovery, protect the remains and objects, and immediately notify the Authorized Officer of the discovery. The Permittee shall continue to protect the immediate area of the discovery until notified by the Authorized Officer that operations may resume.

4.) The following Other Terms and Conditions should be deleted as it is not a Term and Condition and is therefore irrelevant to the management of the lease:

- In accordance with Sec. 325, Title III, H.R. 2691, Department of the Interior and related agencies Appropriations Act, 2004 (P.L. 108-108), which was enacted on November 10, 2003, this grazing permit or lease is renewed under Section 402 of the Federal Land Policy and Management Act of 1976, as amended (43 U.S.C. 1752), Title III of the Bankhead-Jones Farm Tenant Act (7 U.S.C. 1010 ET SEQ.), or, if applicable, Section 510 of the California Desert Protection Act (16 U.S.C. 410AAA-50). In accordance with Public Law 108-108 the terms and conditions contained in the expired or transferred permit or lease shall continue in effect under the renewed permit or lease until such time as the Secretary of the Interior completes processing of this permit or lease in compliance with all applicable laws and regulations, at which time this permit or lease may be canceled, suspended, or modified, in whole or in part, to meet the requirements of such applicable laws and regulations.

5.) The following Other Terms and Conditions should be added to the BLM lease:

- The lessee shall submit, upon request, a report of the actual grazing use made on this allotment for the previous grazing period, March 1 to February 28. Failure to submit such a report by March 15 of the current year may result in suspension or cancellation of the grazing lease.
- The lessee shall provide reasonable administrative access across private and leased lands to the BLM for the orderly management and protection of the public lands.

1.5 Allotment Management and Categorization

BLM grazing allotments managed by SFO are assigned a management category. Management categories designated based on the conditions and potential for the rangelands within each allotment. The categories are "Maintain" (M), "Improve" (I), and "Custodial" (C), both the Sheepskin Wash and Wiregrass Lake Allotments fall in the "Custodial" category.

Criteria for "Custodial" (C) Allotments as defined in the 1987 Eastern Arizona Grazing (ROD)

- Present Range condition is not a factor.
- Allotments have low resource production potential and are producing near their potential.

- Limited resource-use conflict/controversy may exist.
- Opportunities for beneficial economic return on public investment do not exist or are constrained by technological or economic factors.
- Present management appears satisfactory or is the only logical practice under existing resource conditions.

The Eastern Arizona Grazing EIS also states “The management objective for this category is to employ minimum management” [Eastern Arizona Grazing (ROD)] page 11. The above criteria are to be used as guidance and the allotment does not need to meet all criteria listed. Changing the season of use to year-round would reduce the management involved with the Sheepskin Wash and Wiregrass Lake Allotments.

1.6 Purpose and Need

The purpose of the Proposed action is to renew the BLM grazing leases for a period of ten years incorporating the change from seasonal grazing to year-round grazing. The Proposed Action would allow the lessees to utilize the BLM-administered public lands in conjunction with the State Leases that are authorized within the allotment boundaries.

The need for this action is to respond to a request for an adjustment of the livestock grazing leases on public land for the Sheepskin Wash and Wiregrass Lake Allotments, and is established by the Taylor Grazing Act, the Federal Land Policy and Management Act (FLPMA), Fundamentals of Range Health (43 Code of Federal Regulations [CFR] 4180), and the Phoenix Resource Management Plan (RMP) (USDI BLM 1989), as amended by the decision record for the Arizona Standards and Guidelines. The Phoenix RMP incorporates by reference the decisions from the Eastern Arizona Grazing Final Environmental Impact Statement (FEIS) Record of Decision (ROD; 1987).

1.7 Decision to be Made

The BLM Authorized Officer will decide either to issue or not issue the term grazing lease; and if issued, determine the terms and conditions necessary for lease issuance to comply with the BLM’s statutory obligations.

1.8 Conformance with Land Use Plan

The Proposed Action is in conformance with the Phoenix Resource Management Plan (RMP) (USDI BLM 1989), as amended by the decision record for the Arizona Standards and Guidelines. The Phoenix RMP incorporates by reference the decisions from the Eastern Arizona Grazing Final Environmental Impact Statement (FEIS) Record of Decision (ROD; 1987) and conforms to the following management decisions:

Grazing Management (GM-02): The grazing program in the area is managed under the provisions of the Taylor Grazing Act of 1934, the Federal Land Policy and Management Act of 1976 (FLPMA), and the Public Rangelands Improvement Act of 1978. [Phoenix] RMP page 14-15.

GM-03: Management of rangeland resources is guided by the Range Program Summary Record of Decision (RPS/ROD) which selected the Preferred Alternative analyzed in the 1987 Eastern Arizona Grazing FEIS. [Phoenix] RMP page 15. All livestock use adjustments will be implemented through documented mutual agreement or by decision. When adjustments are made through mutual agreement, they may be implemented once the Rangeland Program Summary (record of decision) has been adopted. When livestock use adjustments are implemented by decision, the decision will be based on operator consultation, range survey data, ecological site data and monitoring of resource conditions (Eastern Arizona Grazing DEIS. Page 5),

Further, The Phoenix RMP provides the following grazing management objectives: 1) to restore and improve rangeland condition and productivity; 2) to provide for use and development of rangeland; 3) to maintain and improve habitat and viable wildlife populations; 4) to control future management actions; and 5) to promise sustained yield and multiple use.

The 1987 Eastern Arizona Grazing FEIS Preferred Alternative management objectives state:

- Reduce soil erosion and sedimentation and increase infiltration and productivity of rangeland soil. [Eastern Arizona Grazing EIS] page 12.
- Reduce short-term disruption and ensure long-term stability of the local livestock industry and the economy of communities dependent upon public land. [Eastern Arizona Grazing EIS] page 12.

1.9 Relationship to Statutes, Regulations, or other Plans

The rangeland management program is managed under the provisions of the Taylor Grazing Act of 1934 as amended, the Federal Land Policy and Management Act of 1976 as amended, the Public Rangelands Improvement Act of 1978, and the National Environmental Policy Act (NEPA) of 1969. These laws along with the grazing regulations under 43 CFR 4100 and associated BLM Manual policy, authorize and govern administration of livestock grazing on public lands

43 CFR 4100.0-2 Objectives:

- (a) The objectives of these regulations are to promote healthy sustainable rangeland ecosystems; to accelerate restoration and improvement of public rangelands to properly functioning conditions; to promote orderly use, improvement and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands.
- (b) These objectives will be realized in a manner consistent with land use plans, multiple use, sustained yield, environmental values, economic and other objectives stated in the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a- 315r); section 102 of the Federal Land Policy Management Act of 1976 (43 U.S.C. 1701) and the Public Rangelands Improvement Act if 1978 (43 U.S.C. 1901(b)(2)).

43 CFR 4130.3-3 Modification of permits or leases:

Following consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 of this part.

In addition, the Proposed Action would comply with the following laws and/or agency regulations, and are consistent with applicable Federal, state, and local laws, regulations, and plans to the maximum extent possible.

- Taylor Grazing Act of 1934
- Federal Land Policy and Management Act of 1976, as amended (43 U.S.C. 1701 et seq.)
- Public Rangelands Improvement Act of 1978
- Endangered Species Act of 1973, as amended
- Migratory Bird Treaty Act of 1918, as amended
- Bald and Golden Eagle Protection Act of 1940, as amended
- Arizona Revised Statute 17-236
- Section 106 of the National Historic Preservation Act of 1966, as amended
- Native American Graves Protection and Repatriation Act of 1990 (25 U.S.C. 3001- 3013; 104 Stat. 3048-3058)
- Biological Opinion (BO) on the Gila District Livestock Grazing Program #22410-2006-F-0414

1.10 Scoping and Issue Identification

For this analysis, an “issue” is a point of disagreement, or dispute with the Proposed Action based on some anticipated environmental effect. An issue is more than just a position statement, such as disagreement with grazing on public lands. An issue:

- Has cause and effect relationship with the Proposed Action or alternatives
- Is within the scope of analysis
- Has not been decided by law, regulation, or previous decision; and
- Is amendable to scientific analysis rather than conjecture

Identification of issues for this assessment was accomplished by considering the resources that could be affected by renewing the leases for both the Sheepskin Wash and Wiregrass Lake Allotments with year-round grazing. The Notice of Intent (NOI) and Draft LHE for the Wiregrass Lake Allotment were sent to interested publics on September 20, 2020, and the NOI and Draft LHE for the Sheepskin Wash Allotment were sent on May 24, 2021, upon receipt of the letter the interested publics were given 15 days to reply with any comments regarding the Draft LHEs and NOIs to renew the grazing leases. The issues were identified by the ID team, lessee(s), and comments received from interested publics. The issues identified through these parties were:

- What would be the impacts of year-round grazing on the lessee’s ranching operations?

- How will biotic integrity of vegetation be impacted from year-round grazing within these allotments?
- What are the impacts of year-round grazing on threatened and endangered species and more specifically the Mexican gray wolf within these allotments?

2.0 Description of Alternatives, Including Proposed Action

2.1 Proposed Action Alternative

The Proposed Action is to renew the Sheepskin Wash Allotment No. 06084 and Wiregrass Lake Allotment No. 06230 BLM grazing leases for a period of ten years with an adjustment from seasonal use to year-round grazing based on recommended management actions from the respective LHEs. For this EA, the project area refers only to BLM-administered land within these two allotments, due to Section 15 leases only authorizing the forage available on public land.

Leases are issued in Animal Unit Months (AUMs), which accounts for the forage necessary for the sustenance of one cow or its equivalent for a period of one month. Under the Proposed Action, the AUMs associated with the grazing leases would not change. By taking the currently permitted AUMs of each allotment and dividing by 12 (months) to account for the proposed change of yearlong grazing, the livestock number would decrease, therefore, accounting for the same carrying capacity and grazing intensity as previously authorized. The following tables show the proposed changes in season of use for each allotment.

Table 3: Sheepskin Wash Alternative 1-Proposed Action

Sheepskin Wash Current Season of Use				
Allotment Name/Number	Livestock Number/Kind	Grazing period Begin - End	% Public Land	Active Use (AUM)
Sheepskin Wash (No. 06084)	2 Cattle	3/1 – 5/31	100	6
Sheepskin Wash (No. 06084)	2 Cattle	11/1 -2/28	100	8
Sheepskin Wash Proposed Change to Season of Use				
Allotment Name/Number	Livestock Number/Kind	Grazing period Begin - End	% Public Land	Active Use (AUM)
Sheepskin Wash (No. 06084)	1 Cattle	3/1 – 2/28	100	14

Table 4: Wiregrass Lake Alternative 1- Proposed Action

Wiregrass Lake Current Season of Use				
Allotment Name/Number	Livestock Number/Kind	Grazing period Begin - End	% Public Land	Active Use (AUM)
Wiregrass Lake (No. 06230)	36 Cattle	3/1 – 6/30	100	144
Wiregrass Lake (No. 06230)	36 Cattle	2/1 -2/28	100	33
Wiregrass Lake Proposed Change to Season of Use				
Allotment Name/Number	Livestock Number/Kind	Grazing period Begin - End	% Public Land	Active Use (AUM)
Wiregrass Lake (No. 06230)	14 Cattle	3/1 – 2/28	100	177

2.2 No Action Alternative

The No Action Alternative represents the continuation of the existing terms and conditions of the current lease. Under this alternative no changes would be made to the mandatory terms and conditions, and the grazing lease(s) would be renewed for a period of 10 years.

2.3 No Grazing Alternative

Under a No Grazing Alternative, the lease for the Sheepskin Wash Allotment and the Wiregrass Lake Allotment would be canceled. Livestock grazing would not be authorized. BLM would initiate the process in accordance with 43 CFR parts 4100.

3.0 Affected Environment and Environmental Impacts

This section describes the affected environment, specifically the existing or baseline conditions relevant to each issue, followed by a description of the expected impacts that are reasonably foreseeable and have a reasonably close causal relationship to the Proposed Action or alternatives, including those effects that occur at the same time and place as the Proposed Action or alternatives and may include effects that are later in time or farther removed in distance from the alternatives. In this document, the terms “effect” and “impact” are used synonymously.

The BLM is required to consider many authorities when evaluating a federal action. Those elements of the human environment that are subject to the requirements specified in statutes, regulations, or executive orders must be considered in all EAs. Other resource concerns identified within this EA, have been considered by BLM resource specialists to determine whether they would be potentially affected by the Proposed Action. These elements are

identified in Appendix A, along with the rationale for the determination on potential effects. If elements were determined to be potentially impacted, they were carried forward for detailed analysis in this EA; likewise, if an element were not present or would not be affected, it was not carried out for detailed analysis.

For a full description of resources on the allotment please refer to the Sheepskins Wash and Wiregrass Lake Allotments Land Health Evaluations where all resources were identified and discussed in detail.

3.1 How would adjusting the season of use impact the lessee's ranching operation?

3.1.1 Affected Environment

The Sheepskin Wash Allotment is comprised of 1,836 acres, 1,126 acres are private land, 575 acres are State Trust land, and 135 acres are BLM-administered lands. The allotment is in Navajo County, Arizona approximately 11 miles west of the town of Snowflake. The allotment is bordered by Highway 277 to the north and the United States Forest Service to the south. Current grazing within the Sheepskin Wash Allotment is authorized for 2 cattle beginning on March 1 – May 31 and then from November 1 – February 28 totaling 7 months out of the year, for a total of 14 AUMs. The authorized grazing is for BLM-administered land only as Section 15 leases only account for BLM-administered lands, the private land does not have any restrictions and the State grazing lease is authorized for year-long grazing.

The Wiregrass Lake Allotment is comprised of 3,120 acres, 1,867 acres are State Trust land, 983 acres are BLM-administered lands, and 271 acres are private land. The allotment is in Apache County, Arizona approximately 11 miles south of the town St. Johns, Highway 191 lies a few miles east of the allotment and the allotment is bordered by other BLM grazing allotments. Current grazing within the Wiregrass Lake Allotment is authorized for 36 cattle beginning on March 1 – June 30 and then from February 1 – February 28 totaling 5 months out of the year, for a total of 177 AUMs. The authorized grazing is for BLM-administered lands only as Section 15 leases only account for BLM-administered lands, and the private land does not have any restrictions and the State grazing lease is authorized for year-long.

Grazing within the Sheepskin Wash and Wiregrass Lake Allotments has been occurring presumably since the late 1800's to early 1900's. The town of Snowflake, AZ was founded in 1878 by Mormon pioneers, and the cattle industry in Arizona was well established by 1890. The BLM was not established until 1946 and the Arizona organization consisted of the Phoenix Land Office and four Grazing District Offices (Kingman, Phoenix, Safford, and St. George Utah), in 1954 the BLM Arizona State Office was established. The Sheepskin Wash and Wiregrass Lake Allotments were previously managed by the Phoenix District Office and have since been transferred to be managed by the Safford Field Office. It is expected that grazing will continue in the area and the surrounding lands in the foreseeable future.

Grazing involves the development of range improvements including waters, fence lines, corrals, fences, etc. Such improvements have been designed and constructed since grazing has occurred and will continue to be maintained and improved in the foreseeable future. It is not expected that much development if any will take place on the BLM-administered land due to the limited amount of acreage and surrounding land status, although it is possible given the appropriate

analysis and approval. Grazing will continue to be managed in a manner to allow for the continued meeting and maintenance of Land Health Standards.

3.1.2 Environmental Impacts – Proposed Action Alternative

The Proposed Action would allow the lessee(s) to graze cattle year long. The AUMs associated with the grazing leases would not be changed, which would result in neither an increase nor decrease in authorized grazing because the number of cattle would be reduced while the season of use would be extended. This would allow for the lessee to make use of the forage at any point during the grazing year, and therefore greatly improve the ability to manage the allotment in conjunction with other land ownership. The State and private lands do not have any limitations or season of use implemented for grazing, which conflicts with the BLM season of use and limits the lessee's operations. There are no range improvements on BLM-administered land. Cattle would utilize the available forage, given conditions are appropriate, but would more often congregate near water or other permanent range improvements that are on private land.

3.1.3 Environmental Impacts – No Action Alternative

The No Action Alternative would allow for grazing to continue under the current management. Cattle would be grazed seasonally under the current mandatory terms and conditions and management would be restricted by the season of use, thereby reducing the overall flexibility to manage the allotments as a whole. Utilization of State Lease and private land would be limited due to cattle being restricted from BLM-administered land during the months in which grazing is not currently authorized.

3.1.4 Environmental Impacts – No Grazing Alternative

Under the No Grazing Alternative, BLM-administered lands within the current allotment boundaries would no longer be authorized for grazing. State Land and private land within and adjacent to the current allotment boundaries would continue to experience grazing. If the No Grazing Alternative were to be implemented the BLM would have to ensure that un-authorized grazing would not be occurring, this would require a need to fence out the BLM-administered lands within the allotments. The addition of fences would further segment land and reduce the overall management capabilities within the area. The BLM would no longer need to manage these allotments, but compliance inspections would still be needed to ensure cattle are not trespassing and the additional fence lines are being maintained.

The No Grazing Alternative would impact the leases for each allotment, the construction of additional fence lines would be required and if not feasible would impact ranching operations within the allotments including State and private land management.

3.2 How will biotic integrity of vegetation be impacted from year-round grazing within these allotments?

3.2.1 Affected Environment

The affected environment would include the Sheepskin Wash and Wiregrass Lake Allotments. Both allotments fall within the Colorado Plateau Major Land Resource Area (MLRA) (35) and the Mixed Grass Plains (35-1) sub resource area. Each sub resource area has various ecological

sites that are more specific and describe the characteristics such as biotic and abiotic factors. The elevation ranges from 4,800 to 6,300 feet and the allotments receive 10 to 14 inches of precipitation on average per year. A general description of the upland vegetation associated with each allotment is described below.

The Sheepskin Wash Allotment has a total of 135 acres of BLM-administered lands and only one ecological site within the entire allotment. The ecological site associated with the allotment is Loamy Upland 10-14" precipitation zone (p.z.) (DX035XI113). Vegetation within the Loamy Upland 10-14 p.z. ecological site includes but is not limited to *Stipa* species, Indian ricegrass, galleta, blue gramma, fourwing saltbush winterfat and cliffrose.

The LHE for the Sheepskin Wash Allotment includes monitoring data that was gathered for assessing the BLM-administered lands, vegetation present within the allotment included blue gramma, ring muhly, Threeawn, Juniper, broom snakeweed, and forbs. Section 7.1.3 Standard 3: Desired Resource Conditions in the LHE further describes the objectives and compares the data gathered during monitoring.

The Wiregrass Lake Allotment has a total of 983 acres of BLM-administered land, there are two ecological sites within the allotment, Shallow Loamy 10-14" p.z. (R035XA119AZ) and Loamy Upland 10-14" p.z. (RX035X011113). The Shallow Loamy ecological site is the only one that occurs on BLM-administered land within the allotment. Vegetation within the Shallow Loamy 10-14" p.z. ecological site includes but is not limited to needle and thread, blue gramma, sideoats gramma, New Mexico feathergrass, and galleta. Shrub species include Bigelow sagebrush, ephedra, Mexican cliffrose, rabbitbush, and fourwing saltbush.

The LHE for the Wiregrass Lake Allotment includes monitoring data that was gathered for assessing the BLM-administered lands, vegetation present within the allotment included blue gramma, prickly pear, tobosa, and forbs. Section 7.0 Determinations of Land Health Standards in the LHE further describes the objectives and compares the data gathered during monitoring.

Upland vegetation has been impacted in the past, present, and will continue to be impacted in the foreseeable future by various factors. Climatic variations have been observed including years of drought, floods, and influxes in temperature, plants are dependent on climate and conditions can be favorable or stressing depending on species. This will influence plant communities and vegetation allowing for transitions in composition. Human influence also plays a role in vegetation, lack of natural fire regime, recreation, introduced species are all influencing factors on upland vegetation. It is expected that these will continue to influence the area in the foreseeable future.

3.2.2 Environmental Impacts – Proposed Action Alternative

The upland vegetation within the allotments would be available for grazing year-round and could experience periods of continuous grazing if authorized. This could also add stress to warm season grasses as both allotments, are rested in the summer months under the current terms and conditions. The number of AUMs associated with each allotment would not change, therefore, the amount of grazing authorized would neither be increasing or decreasing with the Proposed Action. Within the Safford Field Office, acceptable utilization rates are around 40 percent, with

up to 60 percent utilization in drought years. The allotments would continue to periodically be inspected to ensure overgrazing and resource damage is not occurring within either allotment. Grazing regulation § 4110.3–2(b) allows the authorized officer to decrease permitted use if grazing use is causing an unacceptable level or pattern of utilization.

Invasive and non-native species on the Sheepskin Wash Allotment showed a slight departure from the ESD. This was largely due to juniper encroachment in the area. However, the LHE did not determine that grazing is the causal factor for this encroachment and in general there has been an increase in juniper throughout the region. Refer to Sheepskin Wash LHE, Sections 7.1.1 and 7.1.3 for detailed analysis of the upland vegetation for the allotment.

Wiregrass Lake Allotment was achieving standards for upland vegetation and detailed analysis can be found in Section 7.0 Determinations of Land Health Standards of the Wiregrass Lake LHE.

Year-long grazing could potentially impact vegetation by eliminating a season restriction that allows for rest but is not expected to be significant if at all as the allotments would be grazed at the same intensity since the AUMs associated with each allotment are not changing. It is also expected that the Land Health Standards will continue to be met through the Proposed Action. Additionally, yearlong grazing allows lease holders to make better use of the allotments when conditions are applicable and allow for additional periods of rest when conditions warrant as season of use would not be a limiting factor. The potential for the vegetation and management actions are naturally limited as the BLM-administered lands do not encompass a large area and management objectives differ with landownership.

3.2.3 Environmental Impacts – No Action Alternative

The No Action Alternative would allow for current management to continue as is. The LHEs determined the Land Health Standards were being achieved for both the Sheepskin Wash Allotment and Wiregrass Lake Allotment under the current management. It is expected that there would be neither negative nor beneficial impacts to upland vegetation on either allotment under the No Action Alternative.

Invasive and non-native species on the Sheepskin Wash Allotment showed a slight departure from the Ecological Site Description. This was largely due to juniper encroachment in the area. However, the LHE did not determine that grazing is the causal factor for this encroachment and in general there has been an increase in juniper throughout the region. Juniper encroachment would be expected to increase or remain as is under current management. To reduce the amount of juniper, a vegetation treatment would likely be needed. Refer to Sheepskin Wash LHE Section 7.1.1 and Section 7.1.3 for detailed analysis of the upland vegetation for the allotment.

Wiregrass Lake Allotment was achieving standards for upland vegetation and detailed analysis can be found in Section 7.0 Determinations of Land Health Standards of the Wiregrass Lake LHE. It is expected that conditions would continue to meet standards with the current management.

The flexibility in management would be limited to the season of use as currently permitted on the current grazing leases. The State and private lands would continue to be restricted as the lessee's

would have to ensure cattle do not have access to BLM-administered lands out of season. There are no known impacts associated with reasonably foreseeable future actions.

3.2.4 Environmental Impacts – No Grazing Alternative

Eliminating grazing from both allotments would likely result in beneficial impacts to the vegetation occurring on the BLM-administered land, although the allotments in general have a low resource production potential and eliminating grazing would not result in any significant changes to the landscape. The land ownership within the allotments and surrounding area consists of small, segmented tracts of State, BLM, and private land, which makes it difficult for management actions to have any meaningful results to the landscape, therefore, eliminating grazing would likely result in little to no change for the overall biotic integrity.

Some improvement in vegetation composition could be observed in the foreseeable future but it would not be expected to a significant degree as the sites are currently meeting the AZ Standards for Rangeland Health and are functioning within their capabilities and the with the relatively small amount of BLM-administered land the potential is limited.

3.3 What are the impacts of year-round grazing on threatened and endangered species and more specifically the Mexican gray wolf within these allotments?

3.3.1 Affected Environment

The affected environment would include the Sheepskin Wash and Wiregrass Lake Allotments, A general description of the upland vegetation associated with each allotment is described in the Upland Vegetation analysis above in Section 3.2.1.

The grazing program for the BLM Gila District, including grazing activities within the Sheepskin Wash and Wiregrass Lake Allotments, was assessed pursuant to Section 7 of the Endangered Species Act (ESA) to determine whether the program would jeopardize the continued existence of a threatened and endangered (T&E) species and/or their designated or proposed habitat. Management actions in the past have considered changes in policy and updates as related to T&E Species. The allotments will continue to be evaluated and should new species and or habitat be identified as a concern an evaluation would be required.

3.3.2 Environmental Impacts – Proposed Action Alternative

The U.S. Fish and Wildlife Service (USFWS) rendered a Biological Opinion (BO) on the Gila District Livestock Grazing Program #22410- 2006-F-0414 (2012). The BO determined that no conservation measures were needed for the Sheepskin Wash and Wiregrass Lake Allotments due to the absence of the consulted listed species and/or designated critical habitat. Generated reports using USFWS's Information and Planning for Conservation (IPaC) website for Sheepskin Wash and Wiregrass Lake were updated on July 6, 2022. The LHEs for both allotments analyzed the potential impacts of authorized grazing on T&E species and their habitat. The analysis for these species, including Mexican gray wolf, and can be found in Section 2.3.3 Wildlife Resources of each LHE and in Appendix B of this EA.

Mammals

The 2012 Gila District Livestock Grazing BO also concluded livestock grazing would be managed to improve or maintain the productivity of the area and would not affect the native prey base of the wolf. Any wolves likely to be found in the project area are considered part of the experimental, non-essential population, so no action could lead to jeopardy for the species. The survival and reproduction of any wolves that may disperse from the experimental population into the project area would not be affected because the wolves would move to another area if disturbed, and the prey base is unlikely to be adversely affected by livestock management. The most current information from Mexican Wolf Recovery Program Quarterly Update indicates Sheepskin Wash is outside of the Mexican wolf occupied range and is roughly 40 miles from known packs. This source also indicates the nearest packs to the Wiregrass Lake Allotment are the Elk Horn, Hoodoo, and Saffel packs. These packs are documented 15 to 20 miles from the allotment with major highways, 60 and 191, as potential barriers to dispersal (MWIFT 2022). The Proposed Action is not expected to cause direct harm or mortality of wolves or jeopardize the continued existence of the experimental population. No impacts to T&E species are expected from year-long grazing within the allotments.

One species, the New Mexico meadow jumping mouse, was not included in the wildlife analysis for the Sheepskin and Wiregrass LHEs but was indicated on the updated IPaC report for Wiregrass Lake. The analysis for New Mexico meadow jumping mouse is included in this EA in (Appendix B). The allotments do not have the habitat necessary to support this species, which depends on dense riparian vegetation (i.e., sedges, willows) and perennial water (Frey 2017).

Birds

No T&E bird species have the potential to occur on the allotments due to the lack of suitable habitat. There are no effects on T&E bird species from authorized grazing activities on the Sheepskin Wash and Wiregrass Lake Allotments.

Aquatic species

No T&E amphibian or fish species have the potential to occur on the allotments due to the lack of surface water and riparian habitat. There are no effects on aquatic T&E species from authorized grazing activities on the Sheepskin Wash and Wiregrass Lake Allotments.

In the foreseeable future, T&E species would not likely be impacted and Designated Critical Habitat does not currently exist on either allotment. The State and private lands within the allotment are currently authorized for year-long grazing, with private land making up most of the ranching operations for each allotment. The presence and impact from cattle are already experienced year-round for the general area. Changing the season of use would not further impact habitat and/or push out T&E species from the allotments. For a more detailed report on wildlife for the allotments refer to Section 2.3.3 Wildlife Resources within the LHEs and Appendix B of this EA.

3.3.3 Environmental Impacts – No Action Alternative

The No Action Alternative would allow for current management to continue as is. The LHEs determined the Land Health Standards were being achieved for both the Sheepskin Wash Allotment and Wiregrass Lake Allotment under the current management. It is expected that there

would be neither negative nor beneficial impacts to wildlife on either allotment. The impacts associated with reasonably foreseeable future actions would be the same for the No Action and Proposed Action Alternatives.

3.3.4 Environmental Impacts – No Grazing Alternative

The likelihood of T&E species being present on either allotment is low. This is due to the small tracts of segmented land and the vicinity in which they are located. If grazing were eliminated from the allotments the need for additional boundary fence would be required and further segment the lands making it less appealing for wildlife in general.

Eliminating grazing from both allotments would likely result in some beneficial impacts to the upland habitat occurring on the BLM-administered public land. Both allotments are categorized as “Custodial,” meaning the potential for each allotment is limited. Eliminating grazing from both allotments would not result in significant changes in vegetation. This is in large part due to the limited BLM-administered acres within each allotment and the continuation of grazing on the adjacent State and private lands would further limit any significant changes observed from eliminating grazing all together. There are no known impacts associated with reasonably foreseeable future actions.

4.0 Cumulative Impacts

Current conditions in the project area result from a multitude of natural events and human actions that have taken place over many decades. Cumulative effects are defined as the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions” (40 CFR § 1508.7)

The time frame for this analysis is the life of the lease (10 years). The Impacts from the Proposed Action are anticipated to last for the life of the project.

4.1 Past, Present and Reasonably Foreseeable Actions and Effects

- **Threatened and Endangered Species:** The grazing program for the BLM Gila District, including grazing activities within the Sheepskin Wash and Wiregrass Lake Allotments, was assessed pursuant to Section 7 of the Endangered Species Act (ESA) to determine whether the program would jeopardize the continued existence of a threatened and endangered (T&E) species and/or their designated or proposed habitat. Management actions in the past have considered changes in policy and updates as related to T&E Species. The allotments will continue to be evaluated and should new species and or habitat be identified as a concern Section 7 consultation would be completed as required by ESA.
- **Grazing Management:** Grazing will be present on both the Sheepskin Wash and Wire Grass Lake Allotments. Gazing has been occurring in the past, present, and will continue in the foreseeable future. The allotments include both State and private land and the BLM has no administrative authority over these land ownerships. It is expected that grazing would continue in both allotments and adjoining areas.

- **Upland Vegetation:** Upland vegetation has been influenced in the past, present and will continue to be influenced by actions in the foreseeable future. Actions include grazing, developments (roads, utility right of ways, housing, etc.) and natural influences from the environment and climate.

4.2 Cumulative Impacts of the Proposed Action

- **Threatened and Endangered Species:** No additional cumulative impacts are expected to occur because of the Proposed Action. Cattle are currently present yearlong on state and private lands within both allotments and grazing is currently authorized on BLM-administered lands. The allotments will continue to be evaluated and should new species and or habitat be identified as a concern Section 7 consultation would be completed as required by ESA. The Proposed Action would not be expected to result in any incremental impacts or changes when considering past, present and reasonably foreseeable actions and their effects.
- **Grazing Management:** The Proposed Action would allow for grazing management to align with the surrounding state and private lands within both allotments. No additional cumulative impacts are expected to occur because of the Proposed Action. The Proposed Action would not be expected to result in any incremental impacts or changes when considering past, present and reasonably foreseeable actions and their effects.
- **Upland Vegetation:** Cumulative impacts are not expected to change, the Proposed Action would allow for yearlong grazing, but the authorized AUMs would not be changing for either allotment. Under current management the Standards are being achieved and it is expected that they will continue to be achieved with the Proposed Action. The Proposed Action would not be expected to result in any incremental impacts or changes when considering past, present and reasonably foreseeable actions and their effects.

4.3 Cumulative Impacts of the No Grazing Alternative

- **Threatened and Endangered Species:** Under the No Grazing Alternative, cattle will still be present on adjoining lands outside of BLM jurisdiction. Small tracts of BLM-administered land would no longer have any impacts associated with cattle grazing, and new fences would need to be constructed to prevent cattle from accessing BLM-administered land within the allotments. The No Grazing Alternative would not result in cumulative effects to the dominant vegetation, habitat cover, or species communities within the allotment or surrounding allotments.
- **Grazing Management:** The BLM would no longer need to administer grazing leases for either allotment, but periodic checks would still be necessary to ensure cattle are not grazing on BLM-administered public lands. The lessees would be responsible for ensuring cattle do not have access to BLM-administered lands and this could influence grazing management on the state and private lands within the allotment.
- **Upland Vegetation:** Upland vegetation on BLM-administered lands would no longer be grazed. The standards for both allotments are currently being achieved and it is expected

that they would continue to do so without grazing. Natural and variable climatic factors would continue to influence upland vegetation.

4.4 Cumulative Impacts of the No Action Alternative

- Threatened and Endangered Species: There would be no cumulative impacts to threatened and endangered species from the No Action Alternative.
- Grazing Management: No impacts to grazing management would occur. Therefore, no Cumulative impacts analysis of grazing management is required
- Upland Vegetation: No impacts to upland vegetation would occur. Therefore, no Cumulative impacts analysis of upland vegetation is required.

5.0 Consultation, Cooperation, and Coordination

The Sheepskin Wash Draft LHE and Notice of Intent was sent out to interested publics on May 27, 2021, and comments were received from Western Watersheds Project. The comments received did not pertain to the LHE, but interest was expressed for involvement and concerns for this EA. The Final LHE was signed on July 15, 2021. The comments received were considered by the interdisciplinary team and the applicable points were incorporated into the EA.

The Wiregrass Lake Draft LHE and Notice of Intent was sent out to interested publics on September 11, 2021. The Final LHE was signed on May 25, 2021. No comments were received regarding the Wiregrass Lake Allotment. The interdisciplinary team identified issues to be considered in the EA and they are addressed within the document. Refer to Appendix A: Project Resource Review for issues identified for both allotments.

6.0 List of Preparers

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7.0 References

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Appendix A: Project Resource Review

Resource	Determination*	Affected Environment (Rationale for Determination)
NP = Not Present in the area that will be impacted by the Proposed Action NI = Present, but not affected to a degree that would mean detailed analysis is required PI = Present with potential for impact; analyzed in detail in the EA		
Air Quality*	NI	The BLM has reviewed the current National Ambient Air and Quality Standards and non-attainment areas classified by the U.S. Environmental Protection Agency (EPA). The project area is not within a non-attainment air basin for large particulates (PM10) or fine particulates (PM2.5). No additional analysis is warranted.
Areas of Critical Environmental Concern*	NP	Resource not present.
Cultural and Historic*	NI	A Class I Literature Review was conducted for the project area. The scope of the project would not further impact any cultural or historic sites. If present, standard terms, and conditions on the lease would require action if any sites were to be discovered in the future, no additional analysis is warranted.
Environmental Justice*	NP	The implementation of the Proposed Action would not have a disproportionately high or adverse health or environmental effects on low income or minority populations. No additional analysis is warranted.
Floodplains*	NP	Resource not present.
Grazing	PI	This resource was carried forward for analysis in this EA. See chapters 3 and 4 for the discussion.
Climate Change/Green House Gas	NP	Methane Emissions would result in no change as the AUM's associated with each allotment are to remain the same.
Hazardous or Solid Waste*	NP	No Hazardous or Solid Waste would be stored or disposed of on BLM lands because of this project. No additional analysis is warranted.
Invasive and Non-native Species*	NI	The Proposed Action is not expected to have any impacts on Invasive and Non-native Species as grazing is currently authorized in both allotments.
Migratory Birds*	NI	This resource was analyzed in Appendices A and B in the Sheepskin Wash and Wiregrass LHEs. There are no expected impacts, therefore, no additional analysis is warranted.
Minerals	NI	The Proposed Action would not prevent mineral entry or impact federal minerals management. No additional analysis is warranted.
Native and American Religious Concerns*	NI	No locations within the project site have been identified as historically sensitive. Native American cultural and religious locations would not be affected by the Proposed Action. No additional analysis is warranted.

Paleontological Resources	NI	The project areas are located within a Potential Fossil Yield Classification of 2 (low) and 4 (high) potential. Standard terms and conditions on the lease would require action if vertebrate fossils are found. No additional analysis warranted.
Prime and Unique Farmland*	NP	Resource not present.
Threatened and Endangered Species*/Designated Critical Habitat	N	This resource was carried forward for analysis in this EA. See chapters 3 and 4 for the discussion.
Vegetation	PI	This resource was carried forward for analysis in this EA. See chapters 3 and 4 for the discussion.
Visual Resources	NP	The Project Area is located within Visual Resource Management (VRM) Class IV, which allows for major changes to the visual character of an area. No visual resources would be impacted from the Proposed action, no additional analysis is warranted.
Water Quality*	NP	The Proposed Action would not affect water quality or quantity, no additional analysis is warranted.
Wetland or Riparian Zones*	NP	There are no wetlands or riparian areas within or immediately adjacent to the project area.
Wild and Scenic Rivers*	NP	There are no wild and/or Scenic Rivers within or immediately adjacent to the project area, no additional analysis is warranted.
Wilderness*	NP	There are no designated wilderness areas within or immediately adjacent to the project area, no additional analysis is warranted
Wildlife	NP	This resource was analyzed Appendices A and B of the Sheepskin and Wiregrass LHEs.
*Consideration Required by Law or Executive Order		

Appendix B: Threatened and Endangered Species

Threatened & Endangered Species			
Species	Status	Critical Habitat	Comments and Effects Determination
Black-footed ferret ^B <i>Mustela nigripes</i>	Endangered	No Designation	The black-footed ferret relies solely on native grasslands and the presence of prairie dogs for their prey source and for providing burrows to use for shelter and nesting. The BLM-administered portions of the allotments provide suitable grassland habitat to support this species; however, no prairie dogs are known to occur within the allotments. Due to the absence of the key prey source this species is expected to be absent from the allotments. No effect.
Chiricahua leopard frog ^A <i>Lithobates chiricahuensis</i>	Endangered	Designated	No perennial water or suitable aquatic habitat exist on the allotments to support this species. No effect.
Jaguar ^B <i>Panthera onca</i>	Threatened	Designated	The allotments are not within the designated critical habitat. The allotments lack the components of suitable jaguar habitat including connectivity to Mexican populations, dense and complex vegetation cover, and permanent water sources. No effect.
Mexican spotted owl ^A <i>Strix occidentalis caurina</i>	Endangered	Designated	No record of the species occurring within the allotments. No suitable habitat is present on the allotments. No effect.
Little Colorado spinedace ^A <i>Lepidomeda vittata</i>	Threatened	Designated	No suitable aquatic habitat exists on the BLM-administered portions of the allotments to support this species. This species was consulted on in the 2012 BO (USDI USFWS 2012) and conservation measures were provided for the allotments containing critical habitat for this species, which does not include the Sheepskin Wash or Wiregrass Lake allotments. No effect.
Mexican wolf ^A <i>Canis lupus baileyi</i>	Endangered, experimental	No Designation	No wolves occur within the action area. If individual wolves disperse from the experimental population into the action area, humans working near individuals could disturb the wolves, but they would only move to other areas. Livestock grazing would be managed to improve or maintain the productivity of the area and would not affect the native prey base of the wolf. The USFWS issued a letter of concurrence (USDI USFWS 2012) for the determination of "may affect, not likely to adversely affect" regarding the Gila District Grazing Program's actions. Conservation measures will continue to be followed and implemented. No effect.

Monarch butterfly ^A <i>Danaus plexippus</i>	Candidate	No Designation	In Arizona, monarch butterflies oviposition on obligate milkweed host plants which later serve as a food source for larval offspring. Adult monarchs require a diversity of blooming nectar sources along breeding and migration corridors. It is possible individuals could move through the Sheepskin allotments but habitat within the allotments does not provide the food source plants to support this species. No effect.
New Mexico meadow jumping mouse <i>Zapus hudsonius luteus</i>	Endangered	Designated	Allotments are not within the designated critical habitat. This species range included Apache and Navajo counties. It is found within elevations ranging from about 4,500 ft to approximately 9,500 ft. It is a habitat specialist (Frey 2017) requiring dense riparian herbaceous vegetation with a minimum height of 24 inches associated with seasonally available or perennial flowing water, moist soils, and adjacent healthy upland vegetation. The allotments lack suitable habitat in the form of riparian vegetation to support this species. No effect.
Northern Mexican Gartersnake ^A <i>Thamnophis eques megalops</i>	Threatened	Designated	Allotments are not within the designated critical habitat. Allotments lack suitable riparian plant communities to support this species. No effect.
Southwestern willow flycatcher ^B <i>Empidonax traillii extimus</i>	Endangered	Designated	Breeds near surface water or saturated soil along rivers and streams, reservoirs, ciénegas, and other wetlands. Nesting habitat is typically dense vegetation in the 2- to 5-meter range, with or without a high overstory layer, where surface water or soil moisture is high enough to maintain appropriate vegetation characteristics and humidity to support insect prey. Nests in cottonwood/willow and tamarisk vegetation communities with dense canopy cover and surface water along rivers and streams. Known to breed along Little Colorado and have been observed in Snowflake in Cottonwood Wash. During migration, the subspecies uses a wider array of forest and shrub habitats, although riparian vegetation may still be a preferred migration habitat type. The allotments are not within critical habitat and lacks suitable site characteristics to support southwestern willow flycatchers. No effect.
Western yellow-billed cuckoo ^A (distinct population segment) <i>Coccyzus americanus</i>	Threatened	Designated	Yellow-billed cuckoos primarily occur in cottonwood-willow gallery forests of riparian zones of Arizona. Cuckoos may utilize upland areas of the allotments, comprised of pinyon-juniper, for 2-3 weeks prior to migration to and from suitable breeding habitat (Hughes, 2015). The allotments are not within the designated critical habitat and lacks suitable riparian plant communities to support this species. No effect.

Source: USFWS IPaC report generated July 6th, 2022 (USDI USFWS N.d)

Appendix C: Maps

Figure 1: Sheepskin Wash and Wiregrass Lake Allotments Vicinity

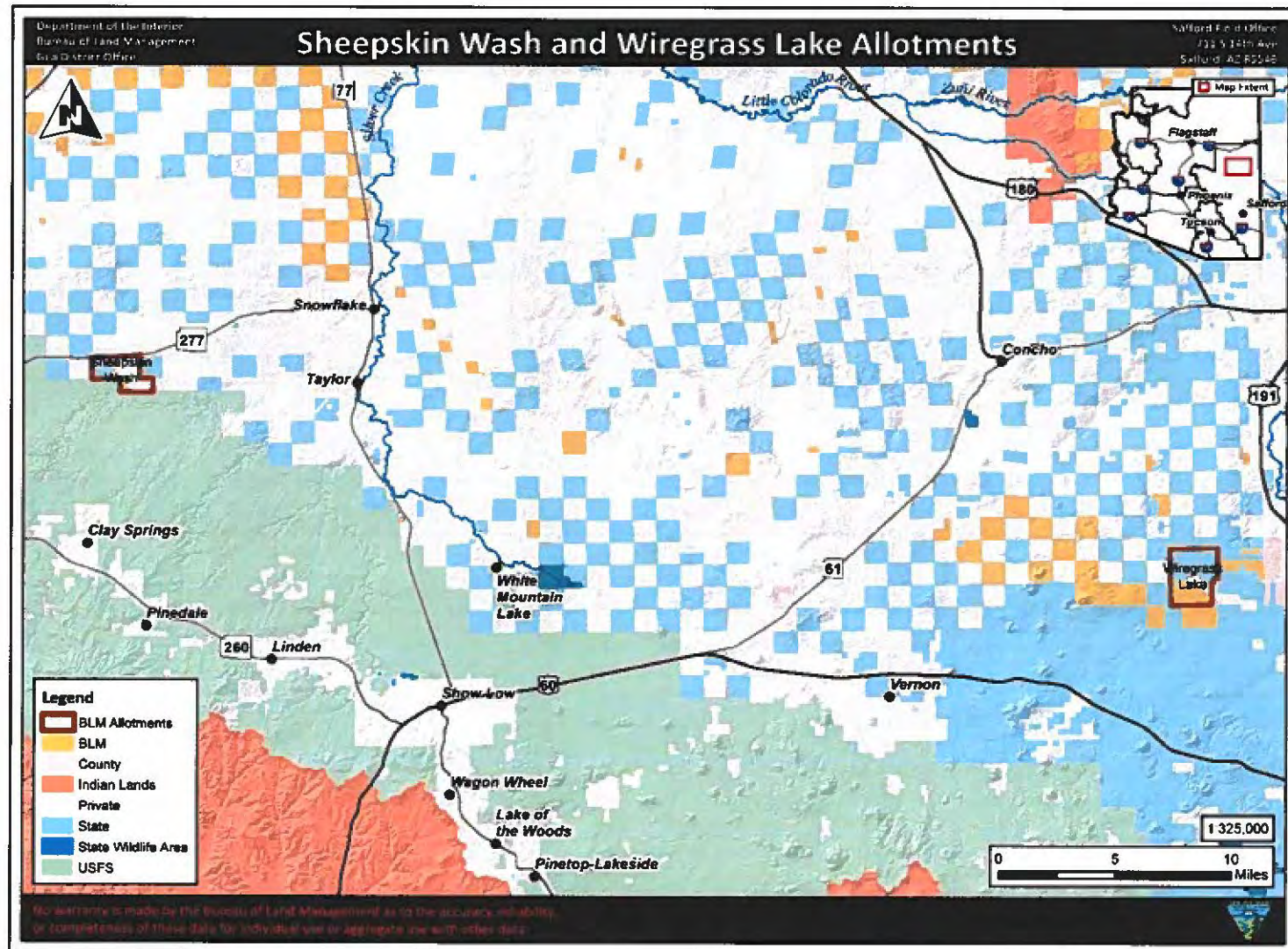


Figure 2: Sheepskin Wash Allotment

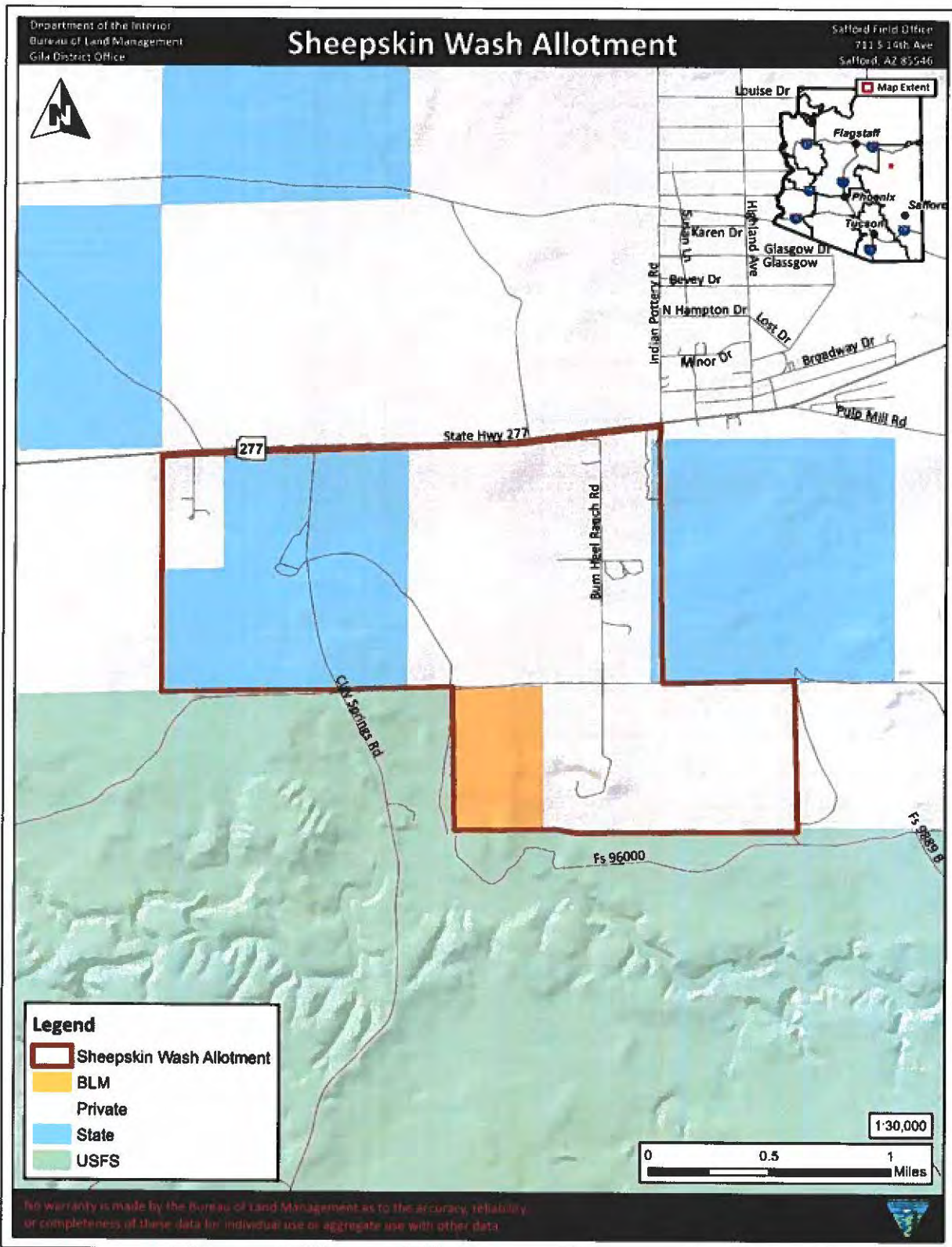
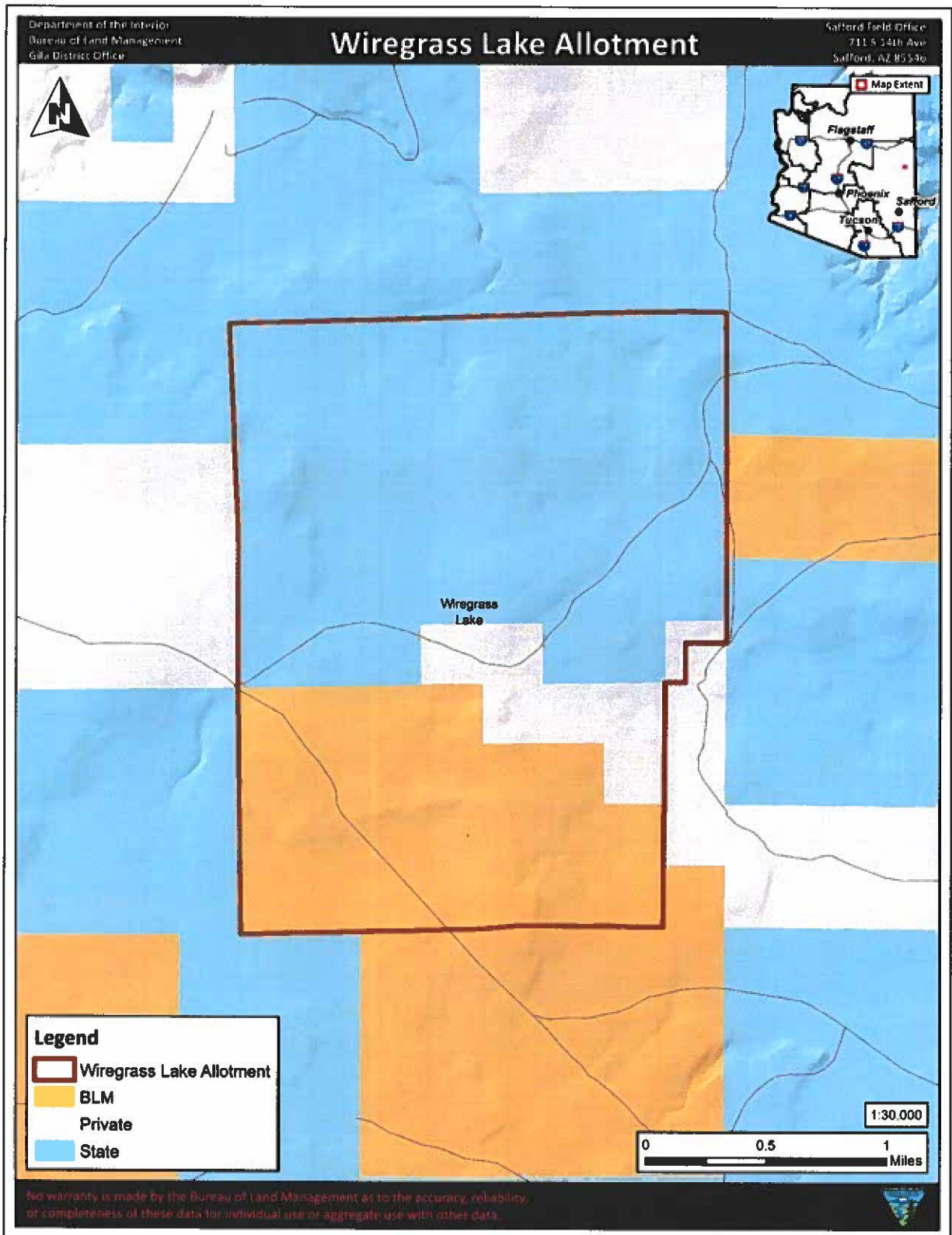


Figure 3: Wiregrass Lake Allotment



Appendix D: Public Comments Received from Draft EA

Comment No./Commentor	Comment	Response
<p>SheepskinWiregrassDraftEA-1-500257542</p> <p>Citizen, Concerned</p>	<p>I reviewed the EA and I do not believe that it is adequate under NEPA and CEQ regulations. For example, the EA does not address the potential climate change impacts from this proposed action with respect to how changing from seasonal to year-round livestock grazing would affect distribution and forage usage and the associated “carbon budget”. Please carefully review the two relevant attachments and include this information in the final EA analysis. Please also include these attachments in the EA NEPA project file. It is important that BLM works to rapidly reduce harmful GHG emissions like methane and to increase the sequestration of harmful atmospheric carbon in growing plants. For this and other reasons, I support and urge BLM to approve the No Grazing Alternative. Thank you very much.</p> <p>Beschta, R. L., Donahue, D. L., DellaSala, D. A., Rhodes, J. J., Karr, J. R., O’Brien, M. H., Fleischner, T. L., & Deacon Williams, C. (2012). Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates. <i>Environmental Management</i>, 51(2), 474–491. https://doi.org/10.1007/s00267-012-9964-9</p> <p>Kauffman, J. B., Beschta, R. L., Lacy, P. M., & Liverman, M. (2022). Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and</p>	<p>See Appendix A: Project Resource Review, Climate change was considered but it was determined to be Not Present (NP), Not Present in the area that will be impacted by the Proposed Action. The Proposed Action is authorizing the change in the season of use, and the AUMs associated with both the Sheepskin Wash and Wiregrass Lake Allotment(s) will remain the same, therefore methane emissions and/or greenhouse gas emissions would result in no change.</p> <p>Further, both allotments previously had Land Health Evaluations (LHEs) completed, the LHEs include information on climatic variability such as drought, temperature, and annual precipitation. Climatic variability also presents itself in a number of biotic integrity indicators and are thus evaluated when considering Land Health Standards.</p>

Comment No./Commentor	Comment	Response
	Adaptation. <i>Environmental Management</i> , 69(6), 1137–1152. https://doi.org/10.1007/s00267-022-01633-8	
SheepskinWiregrassDraftEA-1-500257661 Anonymous	BLM should pick the No Grazing alternative. Cattle grazing is not sustainable on these marginal rangelands during an exceptional drought. Let these stressed lands rest and begin to heal.	The Sheepskin Wash and Wiregrass Lake Allotments have both had LHEs completed in order to evaluate the Land Health Standards on each allotment. The LHEs consider and include information regarding wildlife, forage (biotic communities) and hydrology. The LHEs determined that the allotments were meeting the Land Health Standards, additionally the EA analyzed potential impacts from changing the season of use.
SheepskinWiregrassDraftEA-1-500257639 Anonymous	Please carefully review the excellent report at the web link below and attached. I believe that it is generally relevant to this proposed action and NEPA analysis. https://peer.org/the-biden-administrations-bureau-of-land-management/ As a former 15-year BLM employee, I fully concur with the information in this report. I hope that you find this information of interest. I also hope that relevant Biden administration and Congressional officials will pay close attention to this report. There are enormous opportunities to reform and improve BLM so that it can much more effectively respond to the rapidly worsening climate and extinction crises. Similar opportunities were largely forfeited during the eight Obama years. It is imperative that we learn from those mistakes and not repeat them. Time is running out to make urgently needed progress. Thanks for your consideration.	Comment does not point to specific information from the report that needs to be addressed for the purposes of this EA.

Comment No./Commentor	Comment	Response
<p>SheepskinWiregrassDraftEA-1-500258494</p> <p>Anonymous</p>	<p>I urge BLM to adopt the No Grazing alternative. Cattle grazing results in many adverse impacts to soil, vegetation, and wildlife. The exceptional drought is making these impacts worse. Cattle compete with wildlife for forage and water. This public land should be allowed to heal. Thank you.</p>	<p>The Sheepskin Wash and Wiregrass Lake Allotments have both had LHEs completed in order to evaluate the Land Health Standards on each allotment. The LHEs consider and include information regarding wildlife, forage (biotic communities) and hydrology. The LHEs determined that the allotments were meeting the Land Health Standards, additionally the EA analyzed potential impacts from changing the season of use.</p>
<p>SheepskinWiregrassDraftEA-1-500258628</p> <p>Anonymous</p>	<p>Dear BLM officials: At the web link below, please carefully review the excellent article entitled "Million Cattle Graze on Federal Land for Almost Nothing, but the Cost to the Climate Could Be High". This article is directly relevant to your grazing related proposed action and associated NEPA analysis. Please also carefully review the related attachment on climate change and grazing. And please include this ePlanning comment submission and the attachment in this NEPA project file. BLM must do a much better job of evaluating how its grazing decisions may contribute to the worsening climate crisis. In many cases, the No Grazing alternative should be chosen by BLM. Voluntary grazing permit buyouts should be encouraged and linked to RMP revisions that permanently retire those allotments. The status quo is not sustainable. It is urgent that BLM helps to restore rangeland health and reduce harmful cattle methane emissions. I hope this information is helpful. Thank you for your consideration.</p> <p>https://insideclimatenews.org/news/25072022/the-bureau-of-land-management-lets-1-5-million-cattle-</p>	<p>Please refer to the above comment "SheepskinWiregrassDraftEA-1-500257542" regarding concerns with climate change.</p>

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	<p><u>graze-on-federal-land-for-almost-nothing-but-the-cost-to-the-climate-could-be-high/</u></p> <p>Kauffman, J. B., Beschta, R. L., Lacy, P. M., & Liverman, M. (2022). Livestock Use on Public Lands in the Western USA Exacerbates Climate Change: Implications for Climate Change Mitigation and Adaptation. <i>Environmental Management</i>, 69(6), 1137–1152. https://doi.org/10.1007/s00267-022-01633-8</p>	
<p>SheepskinWiregrassDraftEA-1-500258772</p>	<p>This comment is submitted on behalf of Western Watersheds Project (WWP). The period of time the public has to review the LHE and other documents associated with this project is just 15 days. This period of time is insufficient and WWP has not had enough time to take a careful look at the documents and provide informed comments to the Bureau.</p> <p>We will be submitting additional comments after the comment deadline.</p> <p>For the alternatives the Bureau considers as it moves through this NEPA process, we strongly recommend the Bureau consider permanently closing these allotments. If the Bureau moves forward with any alternative that would authorize livestock grazing in any form – perennial or ephemeral, please include the following language in any and all grazing permits or leases within the project area.</p> <p>"Permittees or lessees with allotments in the Safford Field Office, specifically on the Wiregrass and Sheepskin allotments, are allowed to voluntarily retire their grazing permits or leases and be eligible for</p>	<p>Terms and conditions are meant to assist in achieving management objectives thus the proposed term and condition does not meet the definition of a “term and condition”. BLM Handbook 4110 describes the process for relinquishment where permit/lease holders may voluntarily relinquish their grazing preference. However, these allotments were allocated for grazing under the Phoenix RMP. The RMP would need to be amended to "retire" (make unavailable for grazing) a grazing allotment. This process is outside the scope of the EA. A term and condition is not needed for a permit/lease holder to relinquish their grazing preference and authorization.</p> <p>The BLM considered the complexity of the EA and determined that a 15-day comment period would be adequate for interested parties to submit comments. The Land Health Evaluations were also previously made available for a 15-day</p>

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	<p>compensation from a third-party conservation group. To protect important wildlife, hydrology, soil, and upland on allotments within the area managed by the Bureau, permittees and lessees should be allowed to voluntarily retire their grazing leases and be eligible for compensation from a third-party conservation group. With this compensation ranchers could create more secure and certain financial opportunities while protecting and enhancing the resource values the Bureau is required protect. Voluntary retirement of one or all of the leases within the Safford Field office could result in a permanent retirement of domestic livestock use on the allotment allowed by that permit."</p>	<p>comment period. Draft versions of the LHE were mailed and the opportunity to submit comments or feedback was given prior to the finalization of the LHEs.</p>