

Western Watersheds Project  
P.O. Box 1770  
Hailey, Idaho 83333

Oregon Natural Desert Association  
16 NW Kansas Ave.  
Bend, Oregon 97701

January 11, 2008

VIA U.S. CERTIFIED MAIL

Pat Ryan, Field Manager  
Malheur Resource Area  
Bureau of Land Management  
100 Oregon St.  
Vale, OR 97918

Re: Willow Basin Allotment: 2008 Management

Dear Mr. Ryan,

Thank you for your recent response to our FOIA request regarding the Willow Basin Allotment's 2007 monitoring results. We have reviewed the results and would like to convey our concerns about 2008 management of the Allotment, given that BLM's monitoring data indicates that the applicable standards were uniformly exceeded in 2007.

As you know, the LAMP created utilization standards, including 7–9" stubble height or 40% utilization levels within two miles of sage grouse leks; 4–6" stubble height or 30% woody use in riparian areas; and 50% utilization in native uplands. The LAMP also requires conditions in areas not meeting Standards of Rangeland Health to improve. Finally, the LAMP **requires BLM to take corrective action** if significant progress towards standards is not being made.

For the Bully Creek Pasture, stubble height data sheets collected in 2007 show mean measurements of 3.41 inches and 3 inches. Shrub utilization monitoring data sheets collected in 2007 show mean utilization of 91.75% and 74.13%. Notes in the files state that "almost all young aspen are completely browsed"; head cuts are rapidly moving upstream; and for "[a]ll of the creeks, seeps, and springs that I observed throughout the pasture, the riparian vegetation was completely utilized and had a 'mown' appearance." The notes also indicate that livestock were present on the pasture far later than the scheduled 7/10 off date. We note that results for this pasture are consistent with results submitted to you in our fall 2007 report titled "Willow Basin Allotment: Summary of Field Work and Findings."<sup>1</sup>

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<sup>1</sup> That report documented 2007 utilization rates of 74–100% in the Bully Creek Pasture; high levels of trampling damage on Puckett, McArthur, and South Bully creeks; and a many-fold increase in *E. coli* levels after livestock turnout.

For the Willow Basin Pasture, stubble height data sheets collected in 2007 show mean measurements of 3.12 inches, 2.02 inches, 2.21 inches, and 2.79 inches. Notes in the file indicate that livestock were present on the pasture far later than the scheduled 7/2 off date. Further, the Bendire Creek enclosure was breached and was “completely grazed” with a “mown appearance [that] did not differ in appearance from the riparian [area] in the water gap.”

Similar results were also recorded for the Panhandle Pasture (60% utilization and 3.43 inch stubble height), the Juniper Springs Pasture (stubble heights of 1.97 and 1.68 inches), and Indian Creek Pasture (stubble height of 2.5 inches).

In sum, **every recorded stubble height measurement in the listed pastures exceeded stubble height standards.** The comments also make it abundantly clear that the requirement to improve conditions was also not met.

In light of these clear violations, we request immediate action to comply with the LAMP and prevent imminent environmental damage in the Willow Basin Allotment. Specifically, we request that the Bully Creek and Willow Basin pastures be closed indefinitely until recovery goals in the LAMP have been achieved. **Please let us know by February 1, 2008, whether you will close the Bully Creek and Willow Basin pastures for the 2008 grazing season.**

We also request that the Bendire Creek enclosure be promptly repaired, to ensure it is not breached in the future. When will this be done? Finally, we must inquire as to the status of the scheduled 7-year monitoring evaluation. As you know, the LAMP requires not only annual monitoring, but progress reviews after three, five, and seven years. As you know, 2007 was Year 7. When is this report expected to be released?

Thank you for your attention to these matters. We recognize that you are under budgetary restraints and appreciate the hard work of your staff.

Sincerely,

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Jon Marvel  
Executive Director  
Western Watersheds Project

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Brent Fenty  
Executive Director  
Oregon Natural Desert Association