



United States Department of the Interior

BUREAU OF LAND MANAGEMENT

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Documentation of Land Use Plan Conformance and NEPA Adequacy Dry Gulch (J3JN) Fire Emergency Stabilization and Rehabilitation Plan Determination of NEPA Adequacy (DNA)

Office: Baker Field Office

Tracking Number: DOI-BLM-ORWA-V000-2016-0007-DNA

Proposed Action Title/Type: Dry Gulch Fire (J3JN) Emergency Stabilization and Rehabilitation

Location: See attached map

A. Describe the Proposed Action

Background

The proposed actions are described in the *Post-Fire Recovery Plan, Emergency Stabilization and Burned Area Rehabilitation, Dry Gulch Fire (J3JN), BLM Vale District Office* (hereafter called ESR Plan, November 10, 2015). Specifically, this Determination of National Environmental Policy Act (NEPA) Adequacy evaluates proposed actions for emergency stabilization and rehabilitation of burned areas within the Dry Gulch Fire. This document evaluates proposed actions in the ESR Plan for adequacy of existing NEPA analyses and conformance with the Final Environmental Impact Statement (FEIS, 1989) for the Baker Resource Management Plan (BRMP) Record of Decision (ROD, 1989).

The Dry Gulch Fire is located in the Blue Mountains, at the interface of the Columbia Plateau and Northern Great Basin areas. The fire started September 12, 2015, from a vehicle fire along the Eagle Creek Road north of Richland, Oregon. The fire burned 17,830 acres in Baker County. Of these acres 10,403 are on BLM administered land, 2,478 are on USFS administered land, and 4,949 are on private land.

The fire burned across terrain ranging in elevation from 4,708 feet near the radio tower on USFS land to about 2,500 feet where the fire burned to the water tower that services the community of New Bridge, Oregon, near Richland, Oregon. Fuels are highly variable, ranging from mixed conifer at higher elevations to sagebrush steppe at lower elevations.

The following noxious weeds have previously been documented in the fire area: rush skeleton weed, Scotch thistle, white top (hoary cress), leafy spurge, Dalmatian toadflax, diffuse knapweed, yellow starthistle, Canada thistle, bull thistle, hounds tongue, Mediterranean sage, salt cedar, Russian knapweed, musk thistle and puncturevine. The removal of competing vegetation by the fire will allow these noxious weeds to proliferate and spread unless they are treated. **No Greater sage-grouse priority habitat (PHMA) or general Greater sage-grouse habitat (GHMA) was impacted by the fire.**

The fire burned portions of 7 livestock grazing allotments: 1,252 acres of the Barnard Creek Allotment, 6,270 acres of the Immigrant Gulch Allotment, 968 acres of the Foster Gulch Allotment, 8 acres of the New Bridge Allotment, 63 acres of the Sag Creek Allotment, 1,652 acres of the Road Gulch Allotment, and 90 acres of the Posey Ditch Allotment. The fire impacted 29 miles of livestock management fences. The livestock management fences will need to be rebuilt by 2017.

The fire burned five significant or potentially significant archeological sites on BLM managed lands. Three of these sites are prehistoric lithic scatters; and two sites are segments of the historic wagon roads (Goodale Cut-Off).

Wildlife concerns of the Dry Gulch Fire are the loss of wintering range for deer and elk and the need to monitor aspen regeneration and to fence and protect clones from ungulate browsing. Large stands of mature bitterbrush were completely lost in this fire. It will be necessary to replant these bitterbrush stands in order to support big game species on BLM land. Red Band trout reside in the Powder River which bounds the southern perimeter of the burned area and soil stabilization measures are needed to reduce potential sediment input.

Planned Actions

The area burned by the Dry Gulch Fire is in need of treatment to ensure desirable vegetation will stabilize the site and prevent invasion of undesirable vegetation and/or noxious weeds. This goal can be met by implementing the treatments proposed in the Dry Gulch Fire Emergency Stabilization and Rehabilitation Plan. ESR plan treatments are summarized below:

- Seeding desirable native perennial grasses and forbs in areas with high potential to become infested with medusahead rye for the purpose of site stabilization (approximately 90 acres). Aerial-based and ground-based (without harrowing) seeding methods would be utilized. Seeding methods may vary according to soils, site potential and minimizing impacts to resources.
- Fences, gates, and other livestock management infrastructure damaged by the fire will be repaired.
- 1.5 miles of temporary fences will be constructed to exclude livestock and allow the area to recover or the entire pasture will be closed.
- Protecting the area from livestock grazing during a period necessary for establishment and recovery of the health and vigor of desired vegetation.
- Inventory, identify, and treat noxious weeds during the first year with application methods best suited to each site and weed type. Monitor and retreat, if needed, and treat new sites for two consecutive years.
- Hand planting approximately 1,000 acres of bitterbrush seedlings.
- Install an OHV barrier adjacent to highway 86 to deter OHV impacts on the historic segment of the Goodale Cut-Off Wagon Road.
- To reduce the high risk of elevated stream temperatures in the Lower Powder River due to increased sediment inputs and reduced late season flows, the ESR plan prescribes three recommendations in the Immigrant Gulch riparian corridor. 1) Place wattles in three actively eroding gullies and downslope from springs to reduce sediment delivery into Immigrant Gulch, 2) Cut and drop dead riparian trees into the channel and across floodplain to reduce sediment delivery to the Lower Powder River, promote groundwater recharge for late season flows, and support riparian vegetation recovery, and 3) Lop and scatter dead shrubs for the same reasoning described in #2.
- Treatment effectiveness monitoring and regular monitoring to track potential invasion of unwanted vegetation or noxious weeds.

B. Land Use Plan (LUP) Conformance

LUP Name: Baker Resource Management Plan (BRMP) Date Approved 1989

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

The Baker Resource Management Plan ROD (1989) under Wildlife and Fisheries Habitat Management states on page 18: "Prepare and implement habitat management plans for antelope, sage grouse, raptors and big horn sheep."

Noxious weed treatments will be consistent with the guidelines in the Baker Resource Management Plan ROD (1989), which states on page 50: "(Noxious Weed) Control methods will be proposed and subject to site specific environmental analysis consistent with the Record of Decision on BLM's Northwest Area Noxious Weed Control Program EIS and EIS Supplement."

The Baker RMP ROD (1989) under Cultural Resource Management states on page 41: "Protect and enhance cultural resources through management of cultural properties for information potential, public values and conservation."

The Baker RMP ROD (1989) under Activity Plan Monitoring states on page 7: "On-site inspection of activity plans (for example, Allotment Management Plans, Wildlife Habitat Management Plans, Forest Management Plans) and associated projects will be made periodically to determine if the objectives of the activity plans or projects are being achieved or if unacceptable or unanticipated impacts are occurring," and on page 18 under Monitoring Wildlife section: "Monitoring will include photographs, vegetation transects, macro invertebrate samples and population studies to document condition and trend."

The Baker RMP ROD (1989) under Wildlife and Fisheries Habitat Management states on page 18: "Ensure the availability of palatable shrubs and thermal cover for deer on crucial winter ranges in Baker County." This proposal follows BLM National Seed Strategy (2015) guidance by using site-appropriate seed to meet management objectives. This treatment will use as much local native seed as is available in compliance with WO IM-2014-114.

The Baker RMP ROD (1989) page 41 states: "All wildfires will be evaluated for multi-resource rehabilitation needs." And: "All burn areas will be rested from livestock grazing for two to five growing seasons after burning. Additional rest may be prescribed if resource objectives have not been met."

C. Identify applicable NEPA documents and other related documents that cover the proposed action.

Name and date of applicable NEPA documents that cover the proposed action.

Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005)

The Record of Decision and Environmental Impact Statement prepared for the Baker Resource Management Plan (1989)

Vale District Integrated Weed Control Plan EA (1989)

Northwest Area Noxious Weed Control Program EIS (1987)

Final Programmatic Environmental Impact Statement and Environmental Report for Vegetation Treatments on Public Lands Administered by the Bureau of Land Management in the Western United States, Including Alaska (2007)

The Final EIS for Vegetation Treatments Using Herbicides on BLM Lands in Oregon (2010)

Instruction Memorandum WO IM-2014-114, Sage-Grouse Habitat and Wildland Fire Management (2014).

List by name and date other documentation relevant to the proposed action (e.g., biological assessment, biological opinion, watershed assessment, allotment evaluation, and monitoring report).

None

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Documentation of answer and explanation:

The Dry Gulch treatments, resources, issues and conditions are essentially similar to those characteristics analyzed in the Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005). Common considerations between the Vale District NFESRP EA (2005) and the Dry Gulch ESR proposed action includes the following:

Proposed Treatments

The seeding, seedling planting, fence repair, temporary fence construction, stabilization of archeological sites, stream stabilization, and herbicide applications within the proposed action were analyzed in the Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005), specifically:

- Project Design Features, pgs. 13-17.
- Seedling Planting, pg. 8.
- Livestock Management Fence Repair, pg. 12.
- Stabilization of Known Archaeological Sites, pgs. 12 and 13.
- Livestock Closure, pg. 11.
- Immigrant Creek Lop and Scatter, pg. 10.
- Monitoring Project Implementation and Treatment Effectiveness, pg. 17.
- Noxious Weed Treatment, pg. 9.

Resources and Conditions

Landforms, soil types, and plant community classifications are similar to, or the same as, those described in Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005). The Dry Gulch Fire burned areas that are dominated by soils that support complexes of sagebrush steppe, rigid sagebrush, and coniferous forests.

2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the current proposed action, given current environmental concerns, interests, and resource values?

Yes

Documentation of answer and explanation: With respect to current concerns, interests, and resource values specific to the Dry Gulch Fire burned area, the Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005) analyzed an appropriate range of alternatives. The NFESRP EA analyzed a proposed action constrained by numerous project design elements and a no action alternative.

The Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005) EA included a very specific Purpose and Need (pg. 3). The Purpose and Need was primarily to streamline Emergency Stabilization and/or Rehabilitation plans, actions, and procedures to facilitate orderly and timely on-the-ground treatments that are consistent with the urgent need for wildland fire emergency stabilization and rehabilitation treatments. The Dry Gulch Fire presents similar or the same issues and needs as those described in the Vale District NFESRP EA (2005). The range of alternatives is also appropriate for the Dry Gulch Fire ESR plan analysis. There are no environmental concerns, interests, or resource values that would necessitate a broader range of alternatives.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, and updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Documentation of answer and explanation: There is no significant new information or circumstances that would warrant additional analysis. The Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005) EA analyzed the effects of alternatives including the proposed action within the Dry Gulch ESR plan on invasive annual grasses, and the effects of invasive annual grass cover on fire regimes. All of these issues would be addressed the same as in the NFESRP EA (See pages 21-22, 30-31 and 41-42). The effects analysis outlined in the NFESRP EA (See pages 36-47) fully describes the effects on vegetation, noxious weeds, and annual grasses present in the Dry Gulch burned area.

No new threatened/endangered or Special Status Species (SSS) or environmental concerns have been identified in the project area, since the 2005 NFESRP EA.

4. Do the methodology and analytical approach used in the existing NEPA document(s) continue to be appropriate for the current proposed action?

Documentation of answer and explanation: The methodology and analytical approach used in the Vale District Normal Emergency Stabilization and Rehabilitation Plan (NFESRP) Environmental Assessment (2005) would continue to be appropriate for the current proposed action.

5. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Documentation of answer and explanation: Direct, indirect and cumulative effects of the proposed action are substantially the same as those analyzed in the proposed action, pages 36-47 of the Vale District NFESRP EA (2005).

The effects from implementation of the ESR plan would be to stabilize the burned area and prevent the spread of annual forbs from existing patches on the landscape. The Dry Gulch ESR plan would also rehabilitate resources that may not recover naturally. Project design elements in the Vale District NFESRP EA (See pages 13-17) would minimize or completely avoid adverse effects on SSS species, cultural resources, migratory birds, and soils.

6. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

Documentation of answer and explanation: The Vale District NFESRP EA analysis documents were reviewed by a diverse representation of public entities. This included Federal, state, local, and tribal governments as well as private entities and environmental advocacy groups. The notice of availability of the Environmental Analysis and opportunity to comment on the Vale District NFESRP EA was sent to over 400 individuals, organizations, agencies, local governments, state governments, and federal governments, many of which are the identical interested or potentially affected publics for this ESR Plan.

E. Interdisciplinary Analysis:

The following team members conducted or participated in the preparation of this worksheet.

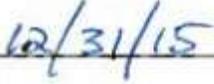
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F. Conclusion

- Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitute BLM's compliance with the requirements of NEPA.



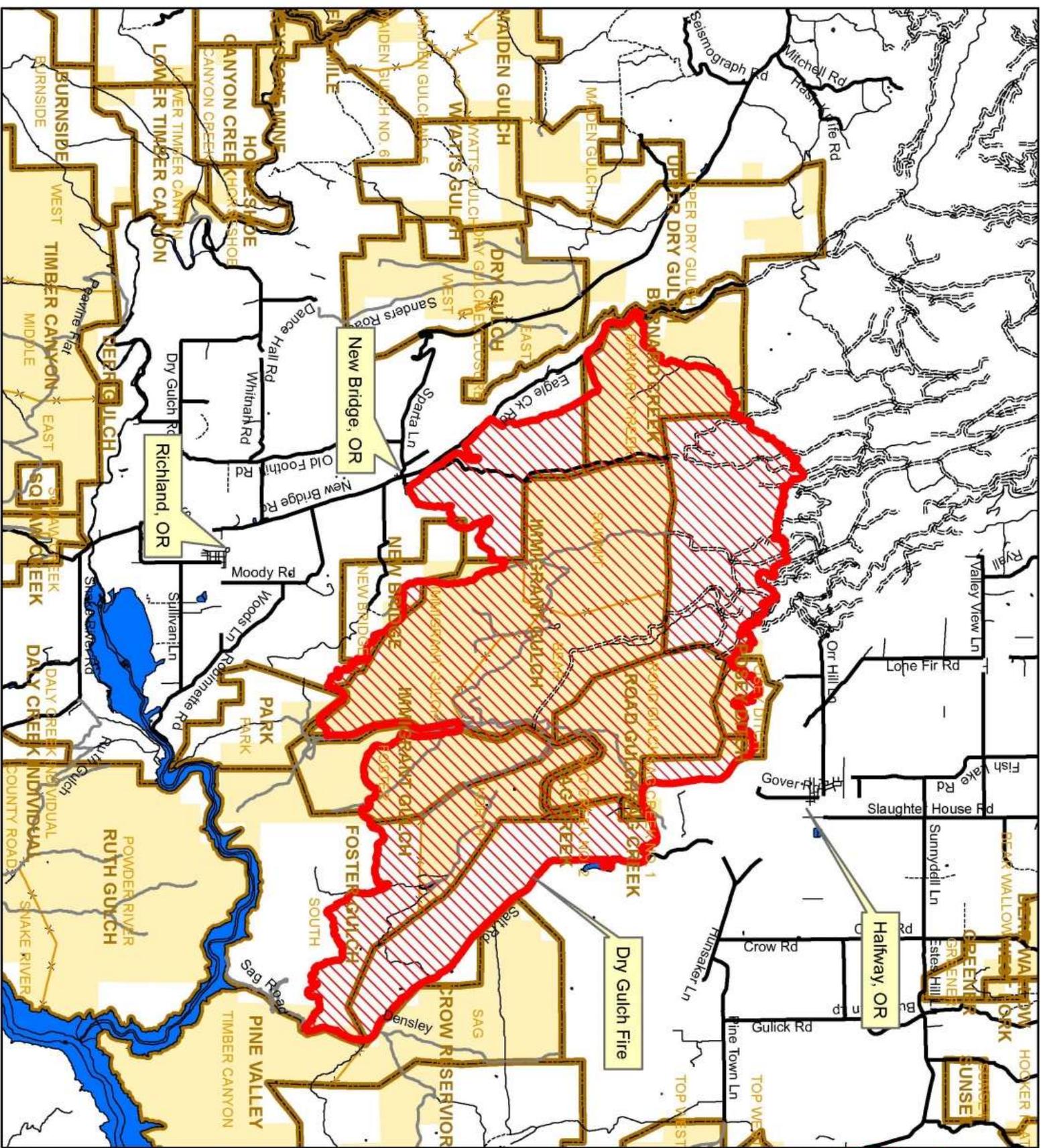
Signature of the Responsible Official



Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision.

Dry Gulch Fire



- Legend**
- Abandoned - 1/4 mile
 - Fence Repair - 6 miles
 - Temporary Fence - 1 mile
 - Dozer Line Seeding Completed
 - Fire Perimeter
 - County route
 - Bureau of Land Management
 - Forest Service
 - Private road (no symbol)
 - Not Known
 - Pasture
 - Allotment
 - x-GR_A_Line
 - Bureau of Land Management Private
 - State Lands



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