Determination of
National Environmental Policy Act Adequacy (DNA)

U.S. Department of the Interior
Bureau of Land Management

Office: Vale District, Baker Resource Area
Tracking Number (DNA #): DOI-BLM-ORWA-V000-2016-021-DNA
Case File/Project Number: Lime Hill J0W7
Proposed Action Title/Type: Lime Hill Fire Emergency Stabilization and Rehabilitation (ESR) Non-Herbicide Treatments
Location/Legal Description: West of Interstate 84 near Huntington, Oregon (see attached map)

A. Description of the Proposed Action: Implementation of Lime Hill Fire Emergency Stabilization and Rehabilitation Plan Without Herbicide Treatments

This document replaces the earlier DNA for the Lime Hill Fire ESR plan (DOI-BLM-ORWA-V000-2016-0002-DNA) issued in December 2015. The Blue Mountains Biodiversity Project appealed the decision based on this earlier DNA, and BLM remanded the decision. Now BLM proposes implementing the emergency stabilization as described previously except any and all herbicide treatments have been withdrawn from the proposed action. Herbicide use in the burned area will be further analyzed at a later time.

Background

The Lime Hill Fire burned both public and private sage-grouse habitat – 1,192 (3,932 private) acres of priority sage-grouse habitat and 1,194 (5,116 private) acres of general sage-grouse habitat. There is one (active) known sage-grouse lek located on private land within the burn perimeter.

The Lime Hill Fire burned 2,575 (9,338 private) acres of designated critical winter range for elk and 2,592 (9,337 private) acres of critical winter range for deer.

The Lime Hill Fire burned eight current Special Status Plant sites. These include locations for Oregon princeplume (*Stanleya confertiflora*) and Snake River goldenweed (*Pyrrocoma radiata*); the most burned sites being goldenweed.

The predominant soils mapped by the soil survey are very fine sandy loams, very stony clay loams, and very cobbly silt loams with moderate to high erosion hazard. The medusahead areas contain loose, shifting soils with a high clay content and high shrink/swell potential. Fencing certain areas off from livestock and reseeding will promote stabilization of soils.

Invasive Plants: Medusahead and annual bromes were dominant in about half the acreage of the public land which burned, and other noxious weeds already present in the burn area include whitetop (hoary cress), spotted knapweed, diffuse knapweed, Russian knapweed, Scotch thistle, perennial pepperweed, Dalmatian toadflax, puncture vine, and jointed goatgrass.

The fire consumed portions of eight grazing allotments. Four allotments will receive rest as treatment for the fire: East Table Mountain, South Durbin Creek, Lime Plant, and Freeway (West Pasture only). Three allotments will require temporary protection fencing to allow continued grazing in unburned portions: Table Mountain, Upper Durbin Creek, and Benson Creek. The Cavanaugh Creek Allotment is nearly all private land, and its public land consists of steep rocky hillsides unlikely to get used by cattle during the fire-recovery period. All allotments will require fence repair, with BLM having responsibility for some five miles of fences which were destroyed. The fire burned out wood post components of fences at the perimeter of the fire (fences which will have to be repaired to protect the burn area from livestock), as well as interior pasture fences that will be needed to properly manage the area when grazing resumes.

Planned Actions

The Bureau of Land Management (BLM), by its own staff or through contracted personnel, proposes to implement the Lime Hill Fire Emergency Stabilization and Burned Area Rehabilitation Plan. The ESR plan includes construction of approximately 3 miles of temporary fence, repair or replace approximately 5 miles of existing fences within the fire, and potential ground seeding of approximately 310 acres and aerial seeding of approximately 200 acres. The seeding would only occur if desirable plants are not adequately establishing in burned areas. The ground seeding would consist of a seed mix with introduced grasses in the Benson Creek area where there is heavy infestation of annual grasses within a currently-existing crested wheatgrass/intermediate wheatgrass seeding. This mix would include Siberian wheatgrass, Ephraim crested wheatgrass, intermediate wheatgrass, mountain brome, and Sandberg bluegrass. The aerial seeding, if conducted, would be a native seed mix in the East Table Mountain area where Snake River goldenweed is present and annual grass infestations are more moderate to patchy. This mix would include bluebunch wheatgrass, Snake River wheatgrass, Bannock thickspike wheatgrass, mountain brome, Canby bluegrass, Lewis flax, and western yarrow. Aerial seeding would be followed by harrowing with ATVs on the flatter terrain to incorporate the seed into the soil. For the native seed mix, local native seed would be preferred if available. For cultural resources, tribes would be consulted about the project, and flag and avoid surveys would be completed before ground seedings are initiated.

None of the proposed fences are within 1.2 miles of a sage-grouse lek, and none of the public land involved in this treatment area contains any aquatic or riparian habitat.

B. Land Use Plan (LUP) Conformance:

LUP Name: Baker Resource Management Plan (RMP) Date Approved: July 12, 1989
The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions) and, if applicable, implementation plan decisions:

Livestock Grazing Management, pages 15 and 110.
Soil, Water and Air Management, page 32.
Fire Management, pages 40 and 41.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

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

Draft Environmental Impact Statement and Land Use Plan Amendments for the Boardman to Hemingway Transmission Line Project (2014)

Oregon Greater Sage-Grouse Proposed RMP Amendment/Final EIS (2015)

Approved Resource Management Plan Amendment for the Great Basin Region, Including the Oregon Sub-Region and Record of Decision (2015)

Secretarial Order 3336, Rangeland Fire Prevention, Management and Restoration (2015)

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

D. BLM Handbook Criteria for making a Determination of NEPA Adequacy:

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?**

   Yes.

   - **Documentation of answer and explanation:** The current proposed actions are identified in the Vale District NFESRP EA and are substantially the same actions as analyzed in that document.

   <u>Lime Hill Fire ESR Plan Proposed Treatments analyzed in the NFESRP EA</u>
   - Natural recovery, page 6
   - Seeding & Planting, page 7
   - Temporary fencing, page 11
   - Design features, pages 13 & 14
   - Vegetation, pages 39-40
   - Wildlife, pages 40-42
   - Grazing Management, page 46

   <u>Resources and Conditions</u>
   The Lime Hill Fire burned area is within the low-elevation shrub-steppe zone analyzed in the Vale District NFESRP. Elevations are between 2400 feet and 4400 feet above mean sea level, and the zone receives between 10-12 inches of precipitation annually.

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

   Yes.

   Documentation of answer and explanation: The NFESRP EA and Baker RMP (1989) analyzed a range of alternatives including no action with respect to current concerns, interests and resource values.

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 Bureau of Land Management [BLM] sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

   Yes.

   Documentation of answer and explanation: There is no significant new information or circumstances that would warrant additional analysis. The NFESRP EA and the Baker RMP anticipated the impact of fire on public land resources and resource values, considered a range of alternatives to address post-fire management, and analyzed the alternative consequences and potential management actions to respond to wildland fire impacts. The NFESRP EA analyzed all treatments considered as a part of this revised ESR proposed action.

There are, however, developments since the NFESRP EA was signed (2005) that were specifically considered through the interdisciplinary effort in the analysis of the revised proposed ESR actions. These issues are specifically described below.

Greater Sage-Grouse Habitat Management

In the Federal Register notice dated October 2, 2015, the US Fish and Wildlife Service determined that the listing of the greater sage-grouse is not warranted at this time (80 FR 191, p 59858-59942).

Completion of the Oregon Greater Sage-Grouse Proposed Resource Management Plan Amendment and Final Environmental Impact Statement (June 2015) and the Approved Resource Management Plan Amendment for the Great Basin Region, Including the Oregon Sub-Region and Record of Decision (September 2015). All treatments proposed in this revised ESR proposed action were reviewed and are consistent with the Sage-Grouse Amendments.

The *Greater Sage-Grouse Wildfire, Invasive Annual Grasses & Conifer Expansion Assessment (Fire and Invasive Assessment Tool (FIAT))* was issued in June 2014. The purpose of this assessment is to identify priority habitat areas and management strategies to reduce the threats to Greater Sage-Grouse resulting from impacts of invasive annual grasses, wildfires, and conifer expansion. The Conservation Objectives Team (COT) report (USFWS 2013) and other scientific publications identify wildfire and conversion of sagebrush habitat to invasive annual grass

dominated vegetative communities as two of the primary threats to the sustainability of Greater Sage-Grouse in the western portion of the species range.

Secretarial Order 3336, Rangeland Fire Prevention, Management and Restoration, was issued in March 2015. The Order places a priority on "protecting, conserving and restoring the health of the sagebrush-steppe ecosystem and, in particular, greater sage-grouse habitat, while maintaining safe and efficient operations," and looks at the allocation of fire resources and assets associated with wildland fire and investments related to restoration activities to reflect that priority.

No new threatened/endangered or Special Status Species (SSS) or environmental concerns have been identified in the project area. The Proposed Action meets goals and objectives of all current management strategies to meet sage-grouse habitat needs.

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

   Yes.

   Documentation of answer and explanation: The methodology and analytical approach used in the NFESRP EA has not changed and will continue to be appropriate for the proposed action. Post-fire monitoring on emergency restoration activities conducted since the signing of the NFESRP EA has shown the effects of the proposed actions to be within the past parameters and expected results of those evaluated in the original analysis.

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?**

   Yes.

   Documentation of answer and explanation: Direct and indirect impacts of the proposed action are substantially the same as those analyzed in the proposed action, pages 37-46 of the NFESRP EA. Cumulative impacts of the proposed actions are substantially the same as those analyzed in the NFESRP EA on page 47.

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 NFESRP EA was reviewed by a diverse representation of publics, including federal, state and local agencies as well as private entities. The notice of availability of the draft NFESRP EA and the opportunity to comment was sent to over 400 individuals, organizations, agencies, local governments, state governments, and federal governments. Since that time BLM has utilized the NFESRP EA analysis to implement multiple ESR fire plans, all of which were done with coordination, cooperation, and consultation with the many entities and publics of record. For the revised proposed actions from the Lime Hill Fire ESR plan, the BLM also requested additional public comments and sent letters to approximately 22 known interested parties, requesting their views on the proposed actions listed in this DNA review for the purposes of assisting the BLM in determining whether existing NEPA analysis adequately analyzed those actions.

E. Interdisciplinary Analysis:

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

Brent Grasty	NEPA Compliance and Planning
Erin McConnell	Weeds Specialist
Melissa Yzquierdo Primus	Wildlife Biologist
John Rademacher	Supervisory Natural Resource Specialist
Craig Martell (preparer)	Rangeland Management Specialist
Katy Coddington	Archaeologist
John Quintela	Fisheries Biologist
Roger Ferriel	Botanist
Bruce Sillitoe	Acting Field Manager

Note: Refer to the Environmental Analysis (EA)/Environmental Impact Statement (EIS) for a complete list of the team members participating in the preparation of the original EA or planning documents.

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 constitutes BLM's compliance with the requirements of the NEPA.

Signature of Authorized Officer: _____ (Acting) Date: 3/22/2016

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. However, the lease, permit, or other authorization based on this determination of NEPA adequacy (DNA) is subject to protest or appeal under 43 Code of Federal Regulations (CFR) Part 4 and the program-specific regulations.