



**Bureau of Land Management**

Boise District Office  
Four Rivers Field Office  
3948 Development Ave  
Boise, ID 83705  
<http://www.id.blm.gov>

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**Determination of Land Use Plan Conformance and NEPA Adequacy (DNA)**  
U.S. Department of the Interior - Bureau of Land Management

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**A. BLM Office:** Four Rivers Field Office

**NEPA Log Number:** DOI-BLM-ID-B010-2011-0068-DNA

**Lease/Serial Case File No.:** F9BN

**Proposed Action Title/Type:** Big Foot Fire (F9BN) Emergency Stabilization & Rehabilitation (ESR) Plan

**Location/Legal of Proposed Action:** T.2S, R.1E, sections 13, 23, 24  
T.2S, R.2E, sections 17, 18, 19, 20

**Applicant (if any):**

**Description of the Proposed Action and any applicable mitigation measures:**

**Emergency Stabilization (ES) Treatments:**

- **Treatment/Activities S7 Protective Fence and Fence Repair, and S12 Livestock Closure:** Portions of two grazing allotments occur within the fire perimeter. The proposal is to close approximately 2,880 acres, in the eastern-most pasture of the Big Foot Allotment (#01341), to livestock use by repairing two miles of existing boundary fence and build three miles of temporary protective fence to close the burned portion of the Sunnyside Winter allotment (#00826), approximately 1,240 acres, until Emergency Stabilization & Rehabilitation (ESR) objectives are met. The temporary fence will be built to BLM wildlife standards.
- **Treatment/Activities S5/R5 Noxious Weeds:** The proposal is also to inventory and treat noxious weeds (whitetop and rush skeletonweed) identified and expanding into 1,646 acres of the burned area. Inventory of weeds would occur in both Fall 2011 and Spring 2012 by Bureau of Land Management (BLM) personnel, and would continue over the next two years under the Burned Area Rehabilitation (BAR) program. Weed control would use chemicals found on the BLM list of approved chemicals and applied either by ATV/UTV or backpack sprayer. All procedures found on the chemical manufacturer's label would be followed.

**Burned Area Rehabilitation (BAR) Treatments:**

- **Treatment/Activities R5 Noxious Weeds:** See S5/R5 Noxious Weeds above.
- **Treatment/Activities R4 Seedling Planting:** Seedling planting would consist of 1,500 one-year-old, containerized seedlings planted on 92 acres in Fall 2012. Wyoming sagebrush seed will be collected in Fall 2011, and nursery grown from Spring 2012 to Fall 2012. Seedlings would be planted in Fall 2012 (FY2013) across approximately 152 acres.
- **Treatment/Activities R7 Repair Existing Fence:** See S7 Fence Repair above.

**B. Conformance with the Land Use Plan (LUP) and Consistency with Related Subordinate Implementation Plans**

<b>LUP/Document<sup>1</sup></b>	<b>Sections/Pages</b>	<b>Date Approved</b>
Snake River Birds of Prey National Conservation Area (NCA) Resource Management Plan (RMP)	Section 2.5, page 2-8 Section 2.6, page 2-9 Section 2.18, page 2-28	September 2008
Boise District Normal Fire Rehabilitation Plan	All	2004

These proposed activities meet the RMP objectives and management actions:

- Watersheds have stable vegetation communities that provide for proper hydrologic function, nutrient cycling, energy flow, and soil stability (Soil Resources: Section 2.5, page 2-8);
- Limit further loss of existing native shrub habitat to no more than 30,000 acres and increase the acres of restored shrub habitat (Upland Vegetation: Section 2.6, page 2-9); and
- Evaluate all burned areas for emergency stabilization and rehabilitation with the goal of restoring shrub and perennial grass communities (Wildland Fire Ecology and Management: Section 2.18, page 2-28).

The interdisciplinary team developed objectives and treatments which respond to the identified issues and concerns. The BLM will evaluate the plan, based on the success or failure in meeting these vegetation and livestock grazing resumption objectives.

**C. Identify applicable NEPA documents and other related documents that cover the Proposed Action. 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).**

<b>NEPA/Other Related Documents</b>	<b>Sections/Pages</b>	<b>Date Approved</b>
Vegetation Treatments Using Herbicides on BLM Lands in 17 Western States Programmatic Environmental Impact Statement (PEIS) and the Vegetation Treatments on BLM Lands in 17 Western States Programmatic Environmental Report	All	June, 2007
Boise District Noxious and Invasive Weed Treatment Environmental Assessment	All	February 6, 2007
Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management	All	August 1997

#### **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?**

**Yes**, a range of proposed actions were analyzed under the Normal Fire Emergency Stabilization and Rehabilitation Plan Environmental Assessment (NFESRP EA) (2005) for the Boise District BLM. These included ground and aerial seeding, herbicide uses for noxious weed treatments, and livestock management actions. An interdisciplinary team review of this fire has determined that the resource values, concerns, and rehabilitation needs are substantially similar to those discussed and approved in the Boise District NFESRP, and best meet the vegetative, watershed, and soil objectives of the Plan and Snake River Birds of Prey NCA RMP.

- 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, resource values, and circumstances?**

**Yes**, the range of alternatives analyzed in the NFESRP EA is appropriate for this action. Two alternatives to the proposed action were analyzed (p. 8-30). Also included was an alternative that would not implement ESR treatments, but was eliminated from detailed analysis because it was not consistent with BLM policy and the No Action Alternative, which would have continued to use the existing 1987/1988 NFESRPs. The overall objective of the NFESRP EA Proposed Action is to stabilize and return a burned site to its previous native and/or seeded condition in the shortest time frame to enhance and protect the watershed, soil, wildlife habitat, and livestock forage values of the area. The proposed

activities in the Big Foot ESR Plan are designed to accomplish that objective for the area burned by the Big Foot Fire (F9BN).

**3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (e.g., riparian proper functioning condition reports; rangeland health standards assessments; inventory and monitoring data; most recent USFWS lists of threatened, endangered, proposed, and candidate species; most recent BLM lists of sensitive species)? Can you reasonably conclude that all new information and all new circumstances would not substantially change the analysis of the new proposed action?**

**Yes**, the proposed treatments, especially the seeding of shrubs, would speed the recovery of habitat used by Piute ground squirrels, black-tailed jackrabbits, and a number of sagebrush-obligate species.

The Big Foot Fire and resulting ESR activities are outside both occupied and potential slickspot peppergrass (*Lepidium papilliferum*) habitat, a federally listed, threatened plant species, and would, therefore, not be impacted.

Prairie falcons may be present from the fall into winter, but the treatments are scheduled for periods outside the nesting/fledging periods. This is consistent with the analysis in the NFESRP (pp. 67-69).

Based on new information gained during recent inventory and survey of the burn area, existing analysis from the NFESRP is adequate. The proposed ESR activities for the Big Foot Fire were analyzed in the Plan and not found to be significant.

**4. 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**, the impacts are substantially unchanged, and the types of impacts relating to the proposed ES and BAR plans were sufficiently analyzed. There are no unique, site-specific impacts resulting from the implementation of the plans or individual treatments. The direct and indirect impacts of the plans are identified and addressed in the NFESRP EA (Section IV, Environmental Consequences, B. Proposed Action by resources affected, pp. 60-75 – Soils, Water, Foodplains/Wetland/Riparian Zones, Air, Vegetation, Terrestrial Wildlife, Aquatic Wildlife, Recreation, Special Management Areas, Visual Resources, Cultural Resources, and Grazing Management). All specific design features outlined in the NFESRP will be followed during implementation of the ESR treatments.

The cumulative impacts analyzed in the existing NEPA document are adequate, with the addition of the proposed action. Special status and non-status plants and animals would be protected by the general and species-specific design features, and would benefit from a return

to more natural fire cycles and improved ecosystem function, including better habitat/population connectivity, migratory corridors, habitat structure, forage, and suitability.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current Proposed Action?**

**Yes**, the public involvement and interagency review of the existing NEPA document is adequate for the current proposed action. The EA states on page 77 that “scoping letters informing the public of the purpose and need for action was sent to 1,077 interested publics including organizations, and federal and state agencies in October, 2003.” The general publics and other agencies included interest from ranchers, academia, conservation groups, Tribal governments, Idaho Department of Fish and Game, and ESA consultation with the USFWS. This document and the Big Foot Fire ESR Plan will be posted on the BLM NEPA web page for public availability, along with other pertinent documents.

**E. Persons/Agencies/BLM Staff Consulted**

<b>Title</b>	<b>Name</b>	<b>Resource/Agency Represented</b>
Team Lead – Fuels Specialist	Sarah Heide	BLM – Boise District
Operations	Alex Webb	BLM – Boise District
NEPA Compliance and Planning	Seth Flanigan	BLM – Boise District
Botanist	Mark Steiger	BLM – Four Rivers FO
Ecologist	Anne Halford	BLM – Four Rivers FO
Archeologist	Dean Shaw	BLM – Four Rivers FO
Rangeland Management Specialist	Mike Barnum	BLM – Four Rivers FO
Wildlife Biologist	Jill Holderman	BLM – Four Rivers FO
GIS Specialist	Dianna Sampson	BLM – Boise District

**Note:** Refer to the EA/EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

**F. Mitigation Measures:** List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures have been incorporated and implemented.

No Mitigation Measures have been identified.

**G. 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 NEPA.

/s/Sarah C. Heide  
Preparer

October 12, 2011  
Date

/s/ Seth Flanigan  
NEPA Specialist

October 12, 2011  
Date

/s/ Patricia Roller  
Four Rivers Field Office  
Morley Nelson Snake River Birds of Prey NCA Manager

October 12, 2011  
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. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.