

**DETERMINATION OF NEPA ADEQUACY (DNA)
WILDHORSE EMERGENCY STABILIZATION AND BURNED AREA
REHABILITATION PLAN**

#DOI-BLM-ID-T030-2022-0027-DNA

Bureau of Land Management

Idaho State Office

Twin Falls District

Shoshone Field Office

FIRE BACKGROUND INFORMATION

Fire Name	Wildhorse
Fire Number	P1QG
District/Field Office	Twin Falls/Shoshone
Admin Number	LLIDT03000
State	Idaho
County(s)	Elmore (8,747 acres) Camas (130 acres)
Ignition Date/Cause	9/4/2022 / Human
Date Contained	9/9/2022

Jurisdiction	Acres
BLM	1,807
Private	7,066
State	0
Total Acres	8,877
Total Costs	\$289,000

A. BLM Office: Shoshone Field Office

Proposed Action Title/Type: Wildhorse Emergency Stabilization and Burned Area Rehabilitation (ESR) Plan

Location of Proposed Action:

Meridian	Township	Range	Affected Sections
Boise	T01S	R11E	8, 9, 16-18, 21, 22, 27

Description of the Proposed Action: The proposed action is to implement the Wildhorse ESR plan as prescribed by the 2013 Twin Falls District Programmatic Emergency Stabilization and Rehabilitation Plan (PESRP) and Environmental Assessment (EA) and outlined in the Wildhorse ESR plan.

The proposed action in the burned area entails 590 acres of aerial grass/forb seeding; ground detection and control of noxious weeds on 1,807 acres utilizing herbicides and/or bio-control; hand planting shrubs; livestock grazing closure; range infrastructure repairs; and monitoring.

- Fall/Winter of 2022 – Approximately 590 acres would be aerially seeded with a grass/forb seed mix in the fall (see ESR Plan under S3 – Aerial Seeding).
- Spring/Summer 2023-2027 – Inventory area for subsequent spot treatments of noxious weeds (see ESR Plan under R5 – Noxious Weed Control).
- Rest the seeding from livestock grazing until plan objectives are met.
- Repair/replace allotment and pasture fences damaged by the fire
- Replace net wire with fencing that meets wildlife-friendly fencing standards.
- Hand plant shrub seedlings.

The Wildhorse Fire started from human causes on September 4, 2022, west of Fairfield, Idaho. The Cow Creek Allotment was impacted, as well as a designated stock driveway outside of any allotment. The fire burned a total of 8,747 acres in Elmore County and 130 acres in Camas County. Of those acres that burned, 1,807 were on BLM administered land. The fire was managed as a local, Type 3 incident. Excessive gusty winds and low relative humidity, dipping into the single digits, drove the fire to grow rapidly.

The fire burned almost 100% of the BLM within the Cow Creek allotment, as well as 1,108 acres of unallocated BLM. The burned area would be rested from livestock grazing until recovery objectives are met. Typically, new seedings require at least two years or longer to successfully establish. A separate fire closure agreement or decision between the BLM and livestock grazing permittees would be developed to ensure that fire recovery objectives are met before livestock are allowed to graze the area. Temporary fences are not requested.

Both sheep and cattle use occur in the allotments affected. Sheep and cattle trailing is authorized, in addition to the regular permitted AUMs. Livestock use occurs from June to October.

The AUMs lost and allowed until recovery are shown in Table 1.

Table 1 - Allotment AUMs Impacted

Allotment	Total Acres	BLM Acres Burned	Total AUMs	% of AUM's Impacted
Cow Creek	5,717	699	902	97%

Proposed vegetation treatments are focused in areas vulnerable to invasive annual grasses and noxious weed expansion and had high vegetation mortality due to the intense fire effects. The area had high shrub cover previously. Additionally, the area has been mapped as a Moderate (4%) and High (92%) to Very High (4%) Priority Landscape for ESR (See attached USGS Site Characterization Report).

Fire Intensity and Pre-burn Vegetation

The burn was characterized by high intensity fire in the areas dominated by a heavier shrub component. Nearly all fine fuels and the majority of the larger shrubs were consumed, leaving a clean seed bed to seed into. The area has not been previously seeded, and has had only small, scattered fires over the last 75 years. Wildhorse Creek runs through the center of the burned area, as well as several mesic meadows and seeps. The area crosses a high diversity of ecological types.

The burn area hosts several plant community types. The closest Assessment, Inventory, and Monitoring (AIM) plot to the Wildhorse fire is approximately 5 miles away in the Four Rivers BLM Field Office. At this plot the ground cover was comprised of 21% bare ground (influenced by a rocky patch along one transect), 10% perennial forbs, 17% perennial grass, and 14% shrubs, 13% of which was sagebrush. Three sagebrush species were present: *Artemisia arbuscula* ssp. *arbuscula*, *Artemisia tridentata* ssp. *vaseyana*, and *Artemisia papposa*. Perennial grasses comprised *Elymus elymoides*, *Pseudoroegneria spicata*, *Festuca idahoensis*, *Poa secunda*, and the non-native *Poa bulbosa*. Sage-grouse preferred forbs included *Eriogonum caespitosa*, *Eriogonum umbellatum*, *Eriogonum sphaerocephalum*, *Phacelia hastata*, *Phlox longifolia*, *Balsamorhiza hookeri*, *Penstemon cusickii*, and *Potentilla arguta*. This plant community type has been observed scattered throughout the northern half of the burn area.

A rare plant survey in 1995 in the southern half of the burn area found *Artemisia tridentata*, *A. papposa*, *A. arbuscula* ssp. *longiloba*, *Elymus* sp., *Festuca idahoensis*, *Perideridia* sp., *Madia* sp., *Gayophytum* sp., *Navarretia* sp., *Calochortus* sp., *Potentilla gracilis*, *Lotus* sp., *Cirsium* sp., *Camassia* sp., *Eriogonum* sp., *Purshia tridentata*, *Lupinus* sp., *Polygonum* sp., *Achillea millefolium*, *Poa compressa*, and *Danthonia californica*. This area was used as a livestock driveway in the past, and has experienced ongoing cattle trespass issues recently. Surveys over this same area in 2021 and 2022 found that the native plant community was partially intact but with *Bromus tectorum* throughout. Other apparently non-native plants were prevalent here, but identification was difficult due to the phenology and overgrazing from trespassing livestock.

Thick patches of mature shrubs were common throughout the burn area consisting mostly of *Artemisia* spp. and *Purshia tridentata*, with some *Chrysothamnus viscidiflorus* and *Ericameria*

nauseosa, resulting in a high burn severity. Patches of mountain shrubs (e.g., *Ceanothus* sp., *Prunus virginiana*, *Amelanchier* sp., *Ribes* spp.) are also present. Several aspen and willow stands are also present, as well as one isolated patch of *Pinus ponderosa* with approximately 10 trees.

Noxious weeds have been observed in the burn area, but scarcely. Along the main Wildhorse Creek Road, *Cirsium arvense*, *Convolvulus arvensis*, *Chondrilla juncea* were recently observed and treated with only a few plants each. *Centaurea diffusa* and *Cynoglossum officinale* have also been observed nearby.

Table 2 - Soil Map Units in the Burned Area – BLM only

Map Unit	Percent of Area	Landform
Roanhide-Bauscher-Schoolhouse association, 10-60% slope	34%	Ridges, hillslopes
Simonton loam, 2-12% slopes	1%	Lava plains, terraces, hillslopes
Yutruie silty clay, 0-12% slopes, extremely stony	35%	Terraces, lava plains
Houk silty clay loam, 0-2% slopes	5%	Stream terraces, flood plains
Harahill-Willho association, 0-12% slopes	24%	Lava plains, stream terraces

Ecological Site Descriptions and associated vegetation types are listed below.

Table 3 - Ecological Site Descriptions and associated vegetation types

Ecological Site Description	Potential Vegetation	Percent of Burned Area
Loamy 8-12"	Provisional	64%
Claypan 8-12"	Wyoming big sagebrush / Bluebunch wheatgrass	23%
Shallow Loamy 8-12"	Provisional	5%
Playa 8-12"	Silver sagebrush / Bluebunch wheatgrass	2.5%
Unclassified / Other	Vegetated lava rock outcrops	6%

Sensitive Wildlife Resources

The fire area supports habitat for a variety of BLM sensitive species (e.g., migratory birds, and pollinators) and priority management species (e.g., mule deer, pronghorn, and elk). Additional wildlife species present include a variety of non-sensitive small mammals and birds. A variety of bat species would be expected to occur in the area particularly for foraging in mesic habitats. The area likely provided suitable pygmy rabbit habitat, although occupancy was unconfirmed. There are currently no Endangered Species Act (ESA) listed species that occur in the fire area. The monarch butterfly is a Candidate for listing under the ESA but was precluded due to other priorities. Candidate species are managed as BLM sensitive species per BLM 6840 policy. There is a vast number of migratory birds that may inhabit the fire area primarily sagebrush associated species. Species expected in pre-burn habitats include the golden eagle, sagebrush sparrow, loggerhead shrike, and green-tailed towhee. Most of these sensitive species are present

seasonally during the breeding season (February 01 to July 31) and then exhibit extensive migration movements to southern latitudes for overwinter habitat. Some species like the golden eagle can be present as resident populations that may not migrate to overwinter habitats outside the region. The nesting season is broad due to the variation in nesting chronologies among species. Federal agencies have additional responsibilities to protect Migratory Birds and Eagles under the Migratory Bird Treaty Act of 1918 as amended, the Bald and Golden Eagle Protection Act of 1940 as amended, and Executive Order 13186 (66 FR 3853, January 17, 2001).

Pollinators

Sensitive pollinators that may be present include the monarch butterfly. The presence of the Western bumblebee and Suckley's Cuckoo bumblebee are possible, but the distribution of these species locally is poorly understood. Monarch butterflies, although limited, are present in the region during the breeding season (May through October). Monarch butterflies are milkweed obligates because milkweed is the only larval host for the species. Showy milkweed is the most common milkweed species in the region. Like *Bombus* species, adult monarchs also forage on a variety of nectar producing plants.

Sage-grouse

Greater sage-grouse are a landscape scale gallinaceous bird that require extensive sagebrush habitats to meet their life history needs and can exhibit extensive shifts in distribution among seasonal habitats (e.g., lekking/early brood-rearing, late brood-rearing, and winter). Unlike other gallinaceous birds' sage grouse do not have a muscular gizzard that allows them to digest seeds. Rather sage grouse rely on sagebrush leaves and succulent forbs for food and rely exclusively on sagebrush in the winter season. Sagebrush is a keystone species of sage grouse habitat and provides for food and cover requirement year-round. Pre-burn conditions provided for suitable sage grouse habitat with multiple seasonal habitats represented. Four occupied leks occur within the burned area. Additionally, the area supports mesic areas which support preferred forbs and insects for forage availability particularly during the late brood-rearing season. Mesic habitats are limited on the landscape and are central to seasonal sage-grouse habitat use during the late brood-rearing season.

Regionally greater sage-grouse have experienced significant habitat loss which has resulted in population declines. The BLM manages for greater sage-grouse habitat needs through management prescriptions identified in the 2015 sage grouse plan amendments (ARMPA 2015). ARMPA 2015 establishes benchmarks for rehabilitation of sagebrush habitats as well required design features to ensure appropriate restoration practices and conservation measures are applied. ARMPA 2015 follows a three-tier habitat-based management approach that designates priority, important, and general habitat management areas. Land use allocations and restrictions on uses are more restricted under Priority habitat but less stringent for Important, and General habitats, respectively. To be responsive to population declines an adaptive management approach was taken which allows Important habitats to be managed as Priority when population and habitat thresholds have been tripped within biologically significant units for populations across the State. Currently all populations and habitat triggers have been tripped in the State and all-

Important habitat management areas are managed as Priority. Additional components of ARMPA management are focused on sage grouse leks and seasonal habitats.

There are four occupied sage grouse leks within the fire area, one of which is on BLM administered land. The fire area provides seasonal sage grouse habitat and key habitat. The latter of which will be relegated as recent burn until post fire succession is assessed; at which time, the status of habitats within the fire area would be R1 (Perennial Grassland), R2 (Annual Grassland), or a combination of the two. Table 4 below identifies the metrics of sage grouse habitat in the fire area, including modeled seasonal sage grouse habitat.

Table 4- Sage-grouse habitat designations within the fire area.

Habitat Management Area	Acres	BLM Acres
GHMA	15.87	0
IHMA *	8,633.93	1,807.18
Key Habitat Classification	Acres	BLM Acres
R1	1,365.63	152.69
K	7,244.25	1,654.49
Sage Grouse Seasonal Use Areas	Acres	BLM Acres
Spring	8,881.95	1,808.20
Summer	8,881.95	1,808.20
Winter	7,964.43	1,410.88

**All Important Habitat Management Areas (IHMA) are managed as Priority.*

Big game

The fire area provides summer habitat for mule deer, elk, and pronghorn. Additionally, the area provides important migration and stopover habitat for mule deer, elk, and pronghorn. The fire area is located within the Smoky Bennett complex which is a priority big game management area as identified in the Idaho State Action Plan relative to secretarial order 3362. Secretarial order 3362 directs agencies within the Department of Interior to work in close partnerships with states to enhance and improve the quality of big-game winter range and migration corridor habitat on public lands to conserve and manage big-game species. The Smoky Bennett complex contains Idaho's largest mule deer population (approximately 40,000 wintering mule deer), resident and migratory elk populations, and an expanding pronghorn population. This complex also includes extensive big game winter range and multiple migration routes linking winter and summer ranges (Idaho State Action Plan Version 2.0). The Wildhorse fire occurs within one of these important linkages. The succession of native grasses, shrubs, and forbs is important to maintain the biological integrity of these habitats. The fire occurs in a montane shrubland with inclusions of aspen. *Ceanothus* and aspen should readily resprout post-fire. Resprouting of bitterbrush may be limited and hand planting with bitterbrush could improve the re-establishment success. Sagebrush reestablishment will be variable depending on proximate seed sources and hand

planting of native mountain big sagebrush, low sagebrush, and Owyhee sagebrush may improve success.

Special Status Plants

The BLM Type 3 Special Status Plant (SSP) bugleg goldenweed (*Pyrrcoma insecticruris*) is present in the Wildhorse fire perimeter. Bugleg goldenweed is endemic to the Big Camas Prairie area, known to occur mainly in Camas County, but extending into Blaine and Elmore Counties. It typically occurs in ecotone edges of ephemerally moist sites and drainages, as well as open shallow basins; gravelly meadows; saddles dominated by herbaceous vegetation; and dry flats at drainage heads. Recent surveys have found this species in steep decline and a review of its conservation status is expected in 2023. Although no research has been done on how well this species survives fire, it has been observed in excellent vigor the year after other recent fires with low burn severity in the area. The greatest threats to this species include encroachment of weeds and sod-forming grass, overgrazing, recreation (e.g., dispersed camping and parking), changes in the water table, and climate change.

There are two populations of bugleg goldenweed in the burn area, both of which were most recently surveyed in August 2022. One population, toward the north of the fire, was vigorous with hundreds of plants flowering with a diverse age class; this is the first time this population had been documented. A back-burn occurred over this population with a low and spotty burn severity. Following the fire, a handful of unburned plants were observed which were either in the fruiting stage or had already dispersed seed. This population is likely to have survived the fire well due to the low burn severity. However, during the pre-burn survey, the following isolated noxious weeds were observed within the population: rush skeletonweed (1 plant), Canada thistle (2 small plants), and field bindweed (approximately 6 small clusters). These were sprayed immediately after the survey. There is a threat of these noxious weeds spreading throughout this population following the fire disturbance.

The other burned population, further south, experienced major decline since it was last surveyed in 1995 most likely due to ongoing livestock trespass issues and encroaching cheatgrass. In 1995 there was a minimum of 450 plants recorded in three large clusters. In 2022, only approximately 10 plants were observed in one cluster and had been grazed with some flower heads removed; the other two clusters had no plants present. The native plant community was partially intact with cheatgrass present throughout the area here in a sparse to moderate distribution. If trespass issues are resolved, cheatgrass expansion following the fire poses the greatest threat to the ability for this population to recover.

The BLM Type 4 SSP fringed water-plantain (*Damasonium californicum*) was documented on non-BLM land approximately 3 miles south of the burn area in 1975, but has not been surveyed for or observed since. Fringed water-plantain is a perennial aquatic species that typically grows in ponds, riversides, and vernal pools. This habitat type is present in the burn area. Although it is widespread in southern Oregon and northern California, it is rare in Idaho, only occurring in the far southwest corner of the state except for this isolated population near the fire. Due to the low burn severity observed in the riparian areas here and the aquatic nature of this species, if it is

present, it is likely to have survived the fire. Riparian zone buffers used in herbicide application will also avoid impacts to this species if it is present.

Aside from *Pyrrcoma insecticruris* and *Damasonium californicum*, no other SSPs are known to occur in or within 10 miles of the Wildhorse fire area, although most of the area has not been surveyed for plants. There is a wide range of plant community types present in the burn area which could host SSPs. Special Status Plants which have the potential to occur here include *Astragalus adanus*, *Astragalus atratus* var. *inseptus*, *Downingia bacigalupii*, *Eriogonum elatum* var. *elatum*, *Juncus bryoides*, *Juncus hemiendytus* var. *abjectus*, *Penstemon laxus*, *Phacelia inconspicua*, *Phacelia thermalis*, *Potamogeton diversifolius*, and *Psilocarphus tenellus*. Treatments proposed in this plan are expected to improve habitat condition and provide an overall benefit to these species. Specific treatments would be assessed for the potential to impact these species and any anticipated adverse impacts to them would be avoided.

Applicant (if any): N/A

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

The following treatments are proposed under this plan:

Emergency Stabilization

S3	Aerial Seeding
S12	Closure (area, livestock)
S13	Monitoring

Burned Area Rehabilitation

R4	Seedling Planting (Contributed Costs)
R5	Noxious Weeds
R7	Fence, Gate, Cattleguard Repair/Replacement
R13	Monitoring

The applicable land use plans for the ESR project are:

- 1) 1981 Sun Valley Management Framework Plan (SV MFP),
- 2) 2015 Bureau of Land Management and the Idaho & Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendments (ARMPA) and Final EIS, and
- 3) Alternative E, the selected alternative, in the 2008 Final Fire, Fuels and Related Vegetation Management Direction Plan Amendment (FMDA) and Environmental Impact Statement (EIS).

Sun Valley Management Framework Plan (SV MFP)

The proposed treatments in this ESR plan are in conformance with the 1981 SV MFP. The overall goals of the SV MFP are to protect and enhance the resources of public lands in order to preserve their capability to contribute toward meeting the resource needs of the nation.

2015 BLM ARMPA

The actions proposed in this ESR plan are also in conformance with the 2015 Idaho & Southwestern Montana Greater Sage-Grouse Approved Resource Management Plan Amendments (ARMPA) and Final EIS.

Post Fire Management (Management Decisions):

- 1) **MD FIRE 32:** Utilize the findings and Restoration/Rehabilitation Strategy developed as part of the FIAT Assessment process described in **Appendix H** to determine if GRSG rehabilitation actions are needed, based on ecological potential, and direct emergency stabilization and rehabilitation (ESR) (BLM) actions after fire.
- 2) **MD FIRE 33:** Incorporate GRSG Habitat Management Objectives into ESR/BAER plans based on site potential and in accordance with the Restoration/Rehabilitation Strategy developed as a result of the FIAT Assessments.
- 3) **MD FIRE 34:** Provide adequate rest from livestock grazing to allow natural recovery of existing vegetation and successful establishment of seeded species within burned/ESR areas. All new seedlings of grasses and forbs should not be grazed until at least the end of the second growing season, and longer as needed to allow plants to mature and develop robust root systems which will stabilize the site, compete effectively against cheatgrass and other invasive annuals, and remain sustainable under long-term grazing management. Adjust other management activities, as appropriate, to meet ESR objectives.
- 4) **MD FIRE 35:** Adjust, as appropriate, livestock management on adjacent unburned areas to mitigate the effect of the burn on local GRSG populations.
- 5) **MD FIRE 36:** Following seedling establishment, modify grazing management practices if needed to achieve long-term vegetation and habitat objectives.

Invasive Species (Management Decisions):

- 1) **MD VEG 10:** Implement noxious weed and invasive species control using integrated vegetation management actions per national guidance and local weed management plans for Cooperative Weed Management Areas in cooperation with State and Federal agencies, affected counties, and adjoining private lands owners.
- 2) **MD VEG 13:** Treat areas that contain cheatgrass and other invasive or noxious species to minimize competition and favor establishment of desired species.

Livestock Grazing (Management Decisions):

- 1) **MD LG 11:** Design any new structural range improvements, following appropriate cooperation, consultation and coordination, to minimize and/or mitigate impacts on GRSG habitat. Any new structural range improvements should be placed along existing disturbance corridors or in unsuitable habitat, to the extent practical, and are subject to

RDFs (Appendix C). Structural range improvement in this context, include, but are not limited to: fences, exclosures, corrals or other livestock handling structures; pipelines, troughs, storage tanks (including moveable tanks used in livestock water hauling), windmills, ponds/reservoirs, solar panels and spring developments.

Required Design Features:

- 1) No repeated or sustained behavioral disturbance (e.g., visual, noise over 10 dbA at lek, etc.) to lekking birds from 6:00 pm to 9:00 am within 2 miles (3.2 km) of leks during the lekking season.
 - 2) Avoid mechanized anthropogenic disturbance, in nesting habitat during the nesting season when implementing: 1) fuels/vegetation/habitat restoration management projects, 2) infrastructure construction or maintenance, 3) geophysical exploration activities; 4) organized motorized recreational events.
 - 3) Avoid mechanized anthropogenic disturbance during the winter, in wintering areas when implementing: 1) fuels/vegetation/habitat restoration management projects, 2) infrastructure construction or maintenance, 3) geophysical exploration activities; 4) organized motorized recreational events.
- 29) Emphasize the use of native plant species, especially those from a warmer area of the species' current range, recognizing that non-native species may be necessary depending on the availability of native seed and prevailing site conditions.
- Utilize available plant species based on their adaptation to the site when developing seed mixes. (Lambert 2005; VegSpec).
 - Utilizing the warmer component of a species' current range when selecting native species for restoration when available (Kramer and Havens 2009).
 - Reduce annual grass densities and competition through herbicide, targeted grazing, tillage, prescribed fire, etc. (Pyke 2011).
 - Reduce density and competition of introduced perennial grasses using appropriate techniques to accomplish this reduction (Pellant and Lysne 2005).
 - Utilize techniques to introduce desired species to the site such as drill seeding, broadcast seeding followed by a seed coverage technique, such as harrowing, chaining or livestock trampling, and transplanting container or bare-root seedlings.
 - Assess existing on-site vegetation to ascertain if enough desirable perennial vegetation exists to consider techniques to increase on-site seed production to facilitate an increase in density of desired species.
 - Use site preparation techniques that retain existing desirable vegetation.
 - Use "mother plant" techniques or planting of satellite populations of desirable plants to serve as seed sources.
 - Utilize post-treatment control of annual grass and other invasive species.
 - Utilize new tools and use of new science and research as it becomes available.
 - Give higher priority to vegetation rehabilitation or manipulation projects that include:
- Sites where environmental variables contribute to improved chances for project success (Meinke et al. 2009).

- Areas where seasonal habitat is limiting GRSG distribution and/or abundance (wintering areas, wet meadows and riparian areas, nesting areas, leks, etc.).
- Re-establish sagebrush cover in otherwise suitable GRSG with consideration to local needs and conditions using the general priorities in the following order:
 - Recently burned native areas
 - Native grassland with suitable forb component
 - Nonnative grassland with suitable forb component
 - Recently converted annual grass areas
 - Native grassland
 - Nonnative grassland
- Where desirable perennial bunchgrasses and/or forbs are deficient in existing sagebrush stands, use appropriate mechanical, aerial or other techniques to re-establish them.
- Examples include but are not limited to, use of a Lawson aerator with seeding, harrow or chain with seeding, drill seeding, hand planting plugs, aerial seeding or other appropriate technique.
- Cooperative efforts that may improve GRSG habitat quality over multiple ownerships.
- Projects that may provide connectivity between suitable habitats or expand existing good quality habitats.
- Projects that address conifer encroachment into important GRSG habitats. In general the priority for treatment is 1) Phase 1 ($\leq 10\%$ conifer cover), 2) Phase 2 (10-30%), and 3) Phase 3 ($>30\%$).
- Replacing stands of annual grasses within otherwise good quality habitats with desirable perennial species. Other factors that contribute to the importance of the restoration project in maintaining or improving GRSG habitat.
- Utilize temporary fencing (e.g., ESR, drop down fencing) where feasible and appropriate to meet management objectives.

Fire, Fuels, and Related Vegetation Management Direction Plan Amendment (FMDA), 2008

The project is also in conformance with the analysis of Alternative E, the selected alternative, in the 2008 Final Fire, Fuels and Related Vegetation Management Direction Plan Amendment (FMDA) and Environmental Impact Statement (EIS). The Final FMDA/EIS amends all Land Use Plans for the Shoshone Field Office except the Craters of the Moon Monument Management Plan, to provide direction and guidance for fire/fuels and related vegetation management.

The FMDA specifically provides for using chemical, mechanical, and seeding treatments with appropriate plant materials to attempt to stabilize sites and prevent dominance of invasive, annual vegetation, and noxious weeds (BLM 2008, pp. 17 and 18).

The proposed action is in conformance with the following landscape-level objective and management action set forth in the FMDA (BLM 2008, pp. 17):

1. **Objective** – Make progress toward Desired Future Condition (DFC) in low-elevation shrub, perennial grass, invasive annual grass, mid-elevation shrub, and juniper vegetation types.
2. **Management Action** – Use chemical, mechanical, seeding, and prescribed fire treatments as appropriate to achieve DFC.

The ESR team developed objectives and treatments which respond to the identified issues and concerns. The BLM would evaluate this plan based on the success or failure in meeting these objectives. Proposed rehabilitation actions conform to the Idaho Standards for Rangeland Health and Guidelines for Livestock Grazing Management.

The treatments outlined in this plan are also consistent with the treatments analyzed in the 2013 Twin Falls District Programmatic Emergency Stabilization and Rehabilitation Plan and EA (#DOI-BLM-ID-T000-2011-0001-EA).

C. Identify applicable NEPA document(s) and other related documents that cover the proposed action.

The proposed action is addressed in the following NEPA documents.

- Twin Falls District Programmatic Emergency Stabilization and Rehabilitation Plan (PESRP) and EA (DOI-BLM-ID-T000-2011-0001-EA), October 31, 2013.
- Twin Falls District Noxious Weed and Invasive Plant Treatment (NWIPT) EA (DOI-BLM-ID-T000-2012-0001-EA), May 24, 2017.

List by name other documentation relevant to the proposed action (e.g., source drinking water assessments, biological assessment, biological opinion, watershed assessment, allotment evaluation, rangeland health standard's assessment and determinations, and monitoring the report).

- Biological Assessment for the Twin Falls District PESRP and U.S. Fish and Wildlife Letter of Concurrence, #01EIFW00-2013-I-0204.
- Biological Assessment for the Twin Falls District NWIPT EA and U.S. Fish and Wildlife Service Biological and Conference Opinion and Concurrence, #01EIFW00-2017-F-0231.

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, the proposed action is a feature of the proposed actions outlined in the 2013 PESRP and 2017 NWIPT EA.

Documentation of answer and explanation: An interdisciplinary resource team review of this fire has revealed that the resource values, issues, stabilization and rehabilitation needs are essentially the same as those analyzed in the 2013 PESRP and 2017 NWIPT EAs and best meet the wildlife, watershed, vegetation and soil objectives in the applicable land use. The primary purpose of the ESR plan is to stabilize soils from erosion impacts by assuring that the pre-existing native plants and proposed seeded plants are protected from grazing use and allowed to recover, maximize growth, and provide a source of live vegetation and litter ground cover for the protection of the soil resource.

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, and circumstances?

Yes, the range of alternatives in the existing NEPA documents is appropriate considering the current proposed action.

Documentation of answer and explanation: The range of alternatives analyzed in the PESRP and NWIPT EAs are appropriate with respect to the proposed ESR activities. One alternative to the proposed action was analyzed in the PESRP EA. The alternative action was a no action alternative which would not implement ESR treatments. The current proposals follow the PESRP proposed action with the overall objective of stabilizing and rehabilitating the burned area 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.

Three alternatives to the proposed action were considered in the NWIPT EA; the No Action alternative, No Use of Herbicides, and No Aerial Application of Herbicides. The No Action alternative would have continued implementation of the existing decisions for noxious weed and invasive plant community treatments. The No Use of Herbicides and No Aerial Application of Herbicides alternatives were considered but eliminated from further analysis. The risk of environmental damage from the spread of noxious weeds and other invasive vegetation, and increased risk of wildfire, particularly due to cheatgrass, would have been greater under these alternatives than the proposed action. The current proposals follow the NWIPT EA proposed action with the overall objective of treating noxious weed and invasive plant communities to enhance and protect the watershed, soil, wildlife habitat, and livestock forage values of the area.

3. Is the existing analysis adequate and are the conclusions adequate in light of any new information or circumstances (Such as, rangeland health standard assessment, recent endangered species listings, 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 the proposed action?

Yes, the existing analysis is still valid. No new resource information was identified that would change the analyses in the 2013 PESRP and the 2017 TFD NWIPT EAs and supporting EIS documents.

Documentation of answer and explanation: The PESRP was approved on October 31, 2013. No new information that would change the proposed action or invalidate the analysis contained in the PESRP has been identified. The TFD NWIPT EA was approved on May 24, 2017. No new information that would change the proposed action or invalidate the analysis of this document has been identified. During the interdisciplinary review, team members consulted the most recent list of Threatened and Endangered species and BLM sensitive species for the Shoshone Field Office.

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 direct, indirect, and cumulative effects that would result from the ESR project are similar to those analyzed in the 2013 PESRP and the 2017 TFD NWIPT EAs and supporting EIS documents.

Documentation of answer and explanation: The proposed action would result primarily in impacts to soils and vegetation. These impacts were considered and fully analyzed in the PESRP and the 2017 TFD NWIPT EAs and supporting EIS documents. With native vegetation recovery, seeding efforts, and control of noxious weeds, the area susceptible to wind erosion would be reduced.

Both EAs adequately analyzed the actions proposed in the ESR plan and it is anticipated that the cumulative impacts of the actions are not substantially different as analyzed in the PESRP of NWIPT EAs. Therefore, there will not be any additional cumulative effects to consider under the plan.

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 PESRP and NWIPT EAs are adequate for the current proposed actions.

Documentation of answer and explanation: Scoping letters informing the public of the purpose and need for action for the PESRP EA were sent to approximately 700 interested publics including organizations, and federal and state agencies beginning in March 2007. On August 24, 2011 the PESRP EA was made available for further comment. Interest from the public and other agencies included ranchers, academia, conservation groups, the Tribes, Idaho Department of Fish and Game, and ESA consultation with the USFWS.

Scoping letters informing the public of the purpose and need for action for the NWIPT EA were sent to approximately 700 interested publics including organizations, and federal and state agencies beginning in November of 2012. The public and other agencies included interest from ranchers, academia, conservation groups, the Tribes, Idaho Department of Fish and Game, and ESA consultation with the USFWS.

The Decision Record would be posted on the BLM's E-Planning website and the ESR Plan is available upon request.

E. Interdisciplinary Analysis:

Team members conducting or participating in the NEPA analysis and preparation of this worksheet.

Name	Title	Resource Represented
Danelle Nance	Fire Ecologist	Fuels
Brandon Brown	Fire Rehabilitation Specialist	Operations
Shaynee Potucek	Range Management Specialist	Range
Jesse Rawson	NEPA Coordinator	NEPA
Jesse Rawson	Wildlife Biologist	Wildlife
Kate Crane	Fisheries Biologist	Fisheries
Katie Asselin	Archaeologist	Cultural
Samantha Seabrook-Sturgis	Natural Resource Specialist	Botany
Seth Kirkpatrick	GIS Specialist	GIS

F. Mitigation Measures:

The seed treatment areas will be monitored, and livestock grazing cessation will occur until plan objectives are met to allow for recovery and maximum production of the newly seeded plants. Sensitive wildlife resources will be avoided, as necessary. Treatments will follow all conservation measures and guidelines identified in the TFD NWIPT EA/Biological Assessment (BA)/Biological Opinion (BO) and the TFD PERSP EA/BA/BO.

Wildlife Conservation Measures

- 1) Avoid potentially disturbing activities and treatments during the migratory bird nesting season from February 1 to July 31, or until nests are no longer active. The breeding season is broad due to the variation in nesting chronologies of migratory birds. Pre-construction clearances can serve to identify the core of the nesting season based on the species present; however, due to the large area of treatment nesting of migratory birds is reasonably certain to occur so mechanical and herbicide treatments during the nesting season should be avoided.
- 2) Avoid mechanical and herbicide treatments of milkweed to minimize potential effects to the species during the breeding season. Botanical clearances would inform the presence of milkweed in the fire area prior to treatments. Avoiding broad-scale mechanical and herbicide treatments during the season nectar producing plants are in bloom would minimize potential adverse effects to all pollinators.
- 3) Fence repair will be completed according to wildlife friendly specifications for all BLM fences. For interior fences, a smooth bottom wire is recommended with a height of 16 to 18 inches and a fence height not exceeding 42 inches. A smooth bottom wire of 18 inches and a max height of 40 inches is best to minimize entanglement with installation of stays

(12" Barbed-top, 6" Barbed, 4" Barbed, 18" Barbless-bottom). All open pipes will be capped or screened to prevent wildlife entrapment. Keeping fences taut and using stays can also minimize entanglement. Wildlife friendly fencing is imperative to minimize the impedance of big game migration movements. Temporary fencing should be avoided if practicable and if necessary, let down fences should be utilized. The application of letdown fences of permanent fences would further reduce seasonal conflicts with migrating big game.

- 4) Supplementing seed with native flowering plants could improve foraging habitat for native pollinators in the fire area.

Considerations have been made for the proposed treatments in this plan and their effects to cultural resources. Emergency actions within the Wildhorse burned area proposed under this plan include noxious weed treatments, aerial seeding, fence repairs, and temporary closures. These are types of undertakings that have a very low likelihood of significantly impacting cultural resources and can be considering exempted under the 2014 State Protocol Agreement between the Idaho BLM and Idaho State Historic Preservation Office (2014 SPA, Stipulation V.A.1 and Appendix C).

CONCLUSION

Based on the review documented above, I conclude that this proposal conforms to the 1981 SV MFP, the 2015 ARMPA, and the 2008 FMDA, and that the NEPA documentation fully covers the proposed action and constitutes BLMs compliance with the requirements of NEPA.

Danelle Nance
Project Lead

Date

Jesse Rawson
NEPA Coordinator

Date

Codie Martin
Field Manager

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.