

UNITED STATES
DEPARTMENT OF THE INTERIOR
Bureau of Land Management
Burns District Office
Andrews Resource Area
Finding of No Significant Impact
Holloway Fire Emergency Stabilization and Rehabilitation Plans
Environmental Assessment
DOI-BLM-OR-B060-2013-0003-EA

INTRODUCTION

The Burns District Bureau of Land Management (BLM), Andrews Resource Area, is proposing to implement emergency stabilization, vegetative restoration, and weed treatments across the Burns, Oregon, District perimeter of the Holloway Fire (G4ZC) in Trout Creek Mountains in accordance with the Holloway Fire Burned Area Rehabilitation (ESR) Plan. This Environmental Assessment (EA) of the Holloway Fire ESR Plan analyzes potential impacts of proposed stabilization and rehabilitation of the burned areas on the human environment.

The Holloway Fire started on August 5, 2012 by lightning approximately 25 miles east of Denio, Nevada at T. 41 S., R. 37 E., SW1/4NE1/4, Sec. 7 and was contained on August 25, 2012 after burning a total of 462,017 acres; 215,542 acres in BLM's Winnemucca, Nevada, District and in Oregon, the fire burned 74,911 acres in Burns District and 170,594 acres in Vale District. The fire burned across Burns District between August 6 and 10, burning seven grazing allotments and six Fenced Federal Ranges (FFRs). Within the burned area there are four Wilderness Study Area (WSA)s making up 60 percent of the affected area: Red Mountain (20 percent), Mahogany Ridge (31 percent), Disaster Peak (5 percent), and Willow Creek (3 percent). One Research Natural Area (RNA) is located within Burns District, Holloway Fire perimeter. The 361-acre East Fork Trout Creek RNA encompasses a quaking aspen stand on the headwaters of East Fork Trout Creek and is designated as such for botanical values.

SUMMARY OF THE PROPOSED ACTION

The Proposed Action is to implement the ESR plan for the Holloway Fire, and apply select herbicides to noxious weeds within a project area encompassing the fire perimeter and areas adjacent to and leading toward the fire perimeter. Stabilization and rehabilitation treatments proposed under this project include applying herbicides (Imazapic, Chlorsulfuron, Clopyralid) to noxious weeds and annual grasses particularly cheatgrass within a treatment area up to 30,000 acres, sagebrush seedling (plugs) planting on 1,833 acres, Bitterbrush hand seeding on 2,186 acres, drill native/desirable non-native seed mix on 1,424 acres, drill native seed on 3,215 acres, aerially seed native species on 28,240 acres within the Holloway fire perimeter, livestock grazing closures on burned portions of pastures and allotments, and monitoring burned areas for noxious weeds and effectiveness of rehabilitation treatments.

While burned areas are not grazed, fine fuels accumulate. The accumulation of these fuels puts the area at risk for another high-intensity wildfire. In addition, grasses often show increased

production following wildfire due to reduced competition and nutrient cycling that occurs from fire events. As noted in 43 CFR 4190.1 Effect of wildfire management decision. “(a) Notwithstanding the provisions of 43 CFR 4.21(a)(1), when BLM determines that vegetation, soil or other resources on the public lands are at substantial risk of wildfire due to drought, fuels buildup, or other reasons, or at immediate risk of erosion or other damage due to wildfire, BLM may make a rangeland wildfire management decision effective immediately...” “Wildfire management includes but is not limited to: (1) Fuel reduction or fuel treatment such as...biological thinning methods...; and (2) projects to stabilize and rehabilitate lands affected by wildfire.” Under these regulations, use by livestock would be allowed to occur within the affected allotments in order to remove fine fuels and reduce the risk of wildfire. Biological thinning would be allowed using a cooperative agreement, outlining the terms and conditions mentioned in this document, as well as any other terms and conditions that may be needed depending on the specific site. The specific area where biological thinning is to occur would be identified on a map and included in cooperative agreements. Supplements and water would be allowed to be placed in these areas to help manage the movement of livestock while meeting their nutrient requirements. Any use occurring outside of the treatment area may be subject to trespass actions. If trespass actions are carried out, that operator would no longer be authorized to participate in biological thinning treatments. If at any point the cooperative agreement is violated, biological thinning would immediately cease and that operator would no longer be authorized to participate in biological thinning treatments. Biological thinning permitting would occur under 43 CFR 4130.5(b)(1) which allows the authorized officer to authorize free use when the primary objective is “the management of vegetation to meet resource objectives...”.

FINDING OF NO SIGNIFICANT IMPACT

Consideration of the Council on Environmental Quality (CEQ) criteria for significance (40 CFR 1508.27), both with regard to context and intensity of impacts, is described below:

Context

The Proposed Action would occur in the Andrews Resource Area and would have local impacts on affected interests, lands, and resources similar to and within the scope of those described and considered in the Steens Mountain Cooperative Management and Protection Area (CMPA)/Andrews Management Unit (AMU) Proposed Resource Management Plan (RMP)/Final Environmental Impact Statement (FEIS), and the 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon FEIS. There would be no substantial broad societal or regional impacts not previously considered in these planning documents.

Intensity

The CEQ's ten considerations for evaluating intensity (severity of effect):

1. *Impacts that may be both beneficial and adverse.* The EA considered potential beneficial and adverse effects. Project Design Features were incorporated to reduce or eliminate impacts. None of the effects are beyond the range of effects analyzed in the planning documents cited above.

Grazing Management: Seeded and naturally recovering areas would recover to desired perennial vegetation, subsequently maintaining or improving available forage for livestock and wildlife. Cattle would be removed until vegetative objectives have been met.

Migratory Birds: Potential noise and visual disturbance associated with aerial seeding or aerial application of herbicides may cause temporary displacement or alter the activity level or behavior of some birds. However, treatments would occur at a time of year when most birds have migrated out of the area, and birds that remain are highly mobile and able to leave the immediate area. Disturbance effects would primarily be limited to the treated areas, where planes or helicopters would be flying closest to the ground. Disturbance effects from aerial seeding and spraying would not be measurable on migratory bird populations due to the brief (few hours) amount of time required to spread the seed or apply the herbicide. Most migratory birds would return to the area or resume activity once seeding or spraying is complete.

Noxious Weeds: Establishing desirable vegetation would enhance the burned area's resistance to noxious weeds. Effective use of the clean equipment Project Design Element would minimize the potential for project introduction of additional noxious and invasive weeds. A weed resistant, desirable plant community would contribute towards soil stability and upland community functionality. Where herbicide treatments are necessary, using these new products, either alone or in combination with currently available products, would provide the best tools available to ensure effective, timely management of the noxious weeds in this area. By controlling the noxious weeds, the potential for success of rehabilitation of the project area following the disturbances from the Holloway wildfire would be enhanced.

RNA: The East Fork Trout Creek RNA falls within an unburned area within the fire perimeter. Establishing desirable vegetation outside the unburned area would decrease impacts caused by use from wildlife and livestock (removed until objectives are met) as would repairing existing fencing. Controlling noxious and invasive weed species would protect the botanical values of the RNA, preventing degradation.

Special Status Species: Sage-grouse: Noise and visual disturbance associated with aerial seeding or aerial application of herbicides may cause temporary displacement or alter the activity level or behavior of some birds. Potential disturbance effects of aerial seeding would not be measurable on sage-grouse individuals and populations due to the relatively brief (few hours) amount of time required to carry out treatments. Potential disturbance effects of drill seeding would not be measurable due to the intensity of the fire removing useable habitat; sage-grouse are not expected to be in the area during the seeding activities.

Application of the proposed herbicides using Standard Operating Procedures (Appendix B) would not only improve the success of the seeding effort, it would help protect native plants that survived the fire. These native plants, especially big sagebrush,

provide a valuable seed source adapted to the local environment, which further reduces the time needed for the native plant community to recover (Leger 2008). The seedling planting would jumpstart the recovery of sagebrush because it typically has a higher survival rate than seeded sagebrush and decreases the period required to achieve reproductive maturity (Lambert, 2005), resulting in less time needed for sagebrush to reach sufficient cover percentages to begin to provide usable habitat. Implementation of this alternative would result in maintenance or improvement of more acres of sage-grouse habitat compared to the No Action Alternative. This would result in a quicker return to pre-fire conditions, providing nesting, brood-rearing, and winter habitat for sage-grouse, as well as providing connectivity to areas outside of the fire.

Fences create a collision hazard to sage-grouse; marking fences as proposed with reflective warning devices is expected to alleviate 83 percent of the potential for this to occur (Stevens et. all, 2010). The nearest lek (Antelope Well) is 3.5 miles north of the proposed fence area, well outside of the 1.25-mile area. The proposed temporary fence would not hinder sage-grouse connectivity in any measurable way, provided it is marked correctly.

Upland Vegetation: This project was designed to establish a ground cover of desired perennial vegetation in those plant communities unlikely to recover naturally within the fire perimeter. Successful seeding of the Proposed Action would further decrease the potential transition to an annual grass dominated community, introduce a longer green period through the growing season, and provide more habitat values than an exotic annual grass community. In comparison to a cheatgrass dominated community, establishment of native and desirable non-native plant species would set the stage to a faster successional trajectory towards a native plant community.

Treating noxious weeds with additional herbicides would benefit upland vegetation by allowing the most effective chemical weed treatments in areas of vegetative disturbance. Treating noxious weeds in these areas would promote and maintain the abundance of native and desired introduced vegetation. These herbicides have been shown to selectively treat cheatgrass and medusahead rye leaving desirable perennial vegetation unharmed (Davies and Sheley, 2011).

Visual Resource Management (VRM): The proposed aerial seeding does not leave any structural on the ground improvements and will help restore the native vegetation. The proposed drill seeding and roller-packing of a proposed seeded area would leave imprints on the ground such as drill rows. However, if the Project Design Features are followed, drill rows and line features would be less noticeable. These actions would meet VRM Class I and II.

Biothinning and spraying of cheat grass and noxious weeds would not have any affect to VRM Class I or II. Weed blast treatments would occur within the existing right-of-way (ROW) for electrical transmission and associated structures. While there would be visual impacts caused by bare ground, the treated areas would be localized nearby power poles. This visual impact would occur within the ROW for the protection of private property;

therefore this action would meet VRM Class I.

The proposed silt dams would not meet VRM Class I, but there is an unmeasurable probability the silt dams would fill in.

The proposed fences are temporary in nature and would be visible to visitors travelling through the area. Once the fences are no longer needed then they would be removed meeting the objectives of VRM Class I.

Wilderness Study Areas: The Holloway Fire burned through portions of four WSAs within the Burns BLM District boundary (administrative). Two of these WSAs fall fully within the Burns District and two only fall partially within the boundary. For all WSAs, the following applies:

Naturalness: Drill and aerial seeding of big sagebrush and native grasses would not affect naturalness and would help speed vegetation recovery. Hand seeding bitterbrush and Wyoming sagebrush plugs would accelerate recovery of these species, enhancing naturalness.

Solitude: Solitude would be affected during the short period of work time associated with aerial and ground seeding and while work is being done on restoring those fences or water developments which existed prior to the fire.

Primitive and Unconfined Recreation: While the ability to continue primitive recreational activities such as hiking and camping are still available; until the flora and fauna of the area has been restored, the satisfaction to be gained from these primitive types of recreation would be minimal.

Special Features: The winter range for deer and antelope has been impacted by the loss of forage. Reseeding the area protects these special features of this WSA. Sage-grouse, which use the area during summer months, would benefit from the reseeded project as well. For further discussion see wildlife section.

Wildlife: Potential noise and visual disturbance associated with ground seeding, aerial seeding or aerial application of herbicides may cause temporary displacement of some larger wildlife species or alter the activity level or behavior of animals in the area. Effects would primarily be limited to the treated areas, where tractors and drills would be in use, or planes or helicopters would be flying closest to the ground. Overall, disturbance effects from aerial seeding and spraying would not be measurable on wildlife populations due to amount of time required to spread the seed or apply the herbicide, 6 to 8 hours a day for up to 45 days during the late fall/early winter. Most of the affected animals would return to the area or resume activity once seeding or spraying is complete.

2. *Degree to which the Proposed Action affects public health and safety.* No aspect of the Proposed Action or alternatives would have an effect on public health and safety beyond

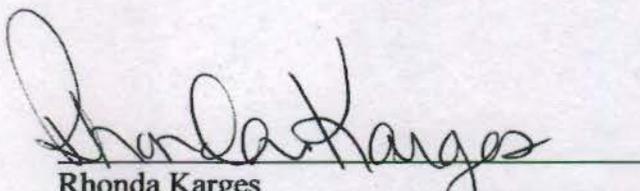
those analyzed in the 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon FEIS (page 100-101, 348-350, 353).

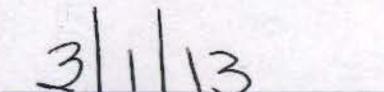
3. *Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas.* The Holloway fire burned inside the Red Mountain WSA, Disaster Peak WSA, Mahogany Ridge WSA, and Willow Creek WSA. In addition, one RNA was affected. Please see information above under “*Impacts that may be both beneficial and adverse*” regarding effects to WSAs and RNA. No other unique characteristics are known to exist within the proposed Project Area.
4. *The degree to which effects on the quality of the human environment are likely to be highly controversial.* Controversy in this context means disagreement about the nature of the effects, not expressions of opposition to the Proposed Action or preference among the alternative. No unique or appreciable scientific controversy has been identified regarding the effects of the Proposed Action or alternatives beyond those analyzed in the 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon FEIS or the CMPA/AMU Proposed RMP/FEIS.
5. *Degree to which possible effects on the human environment are highly uncertain or involve unique or unknown risks.* The analysis has not shown there would be any unique or unknown risks to the human environment nor were any identified in the CMPA/AMU Proposed RMP/FEIS. The Vegetation Treatments Using Herbicides on BLM Lands in Oregon FEIS analyzed the use effects of the proposed chemicals and associated risks.
6. *Degree to which the action may establish a precedent for future actions with significant impacts or represents a decision in principle about a future consideration.* This project neither establishes a precedent nor represents a decision in principle about future actions. The BLM implements emergency stabilization and rehabilitation on BLM-administered lands on a regular and continuous basis following wildfire. Implementation is based on fire size, location, and threats to natural resources and public health and safety. No long-term commitment of resources causing significant impacts was noted in the EA or FEISs.
7. *Whether the action is related to other actions with individually insignificant but cumulatively significant impacts.* The environmental analysis did not reveal any cumulative effects beyond those analyzed in the aforementioned environmental documents. The EA described the current state of the environment (Affected Environment by Resource, Chapter III) which included the effects of past actions, and included analysis of reasonably foreseeable future actions identified in the project area.
8. *Degree to which the action may adversely affect districts, sites, highways, structures or objects listed in or eligible for listing in the National Register of Historic Places.* There are no known features within the Project Area listed or eligible for listing in the *National Register of Historic Places*.

9. *The degree to which the action may adversely affect an endangered or threatened species or its habitat.* There are no known threatened or endangered species or their habitat affected by the Proposed Action or alternatives. Greater Sage-grouse have been listed as warranted but precluded from listing by the United States Fish and Wildlife Service. Effects to sage-grouse and their habitat are described above under "*Impacts that may be both beneficial and adverse*".
10. *Whether an action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.* The Proposed Action does not threaten to violate any law. The Proposed Action is in compliance with the AMU RMP/Record of Decision (ROD), which provides direction for the protection of the environment on public lands.

On the basis of the information contained in the EA and all other information available to me, it is my determination that:

1. The implementation of the Proposed Action or alternatives will not have significant environmental impacts beyond those already addressed in the CMPA/AMU Proposed RMP/FEIS (2004), and the Vegetation Treatments Using Herbicides on BLM Lands in Oregon FEIS (2010);
2. The Proposed Action and alternatives are in conformance with the AMU RMP/ROD (2005), and the Vegetation Treatments Using Herbicides on BLM Lands in Oregon ROD (2010);
3. There would be no adverse societal or regional impacts and no adverse impacts to affected interests; and
4. The environmental effects, together with the proposed Project Design Features, against the tests of significance found at 40 CFR 1508.27 do not constitute a major Federal action having a significant effect on the human environment.


Rhonda Karges
Andrews/Steens Resource Area Field Manager


Date

**USDI, Bureau of Land Management
Andrews Resource Area, Burns District**

DECISION RECORD

**Holloway Emergency Stabilization and Rehabilitation Plan
Environmental Assessment
DOI-BLM-OR-B060-2013-0003-EA**

BACKGROUND

The Burns District Bureau of Land Management (BLM) has prepared an Environmental Assessment (EA) proposing to implement Emergency Stabilization, vegetative restoration, and weed treatments across the Burns, Oregon, District perimeter of the Holloway Fire (G4ZC) in Trout Creek Mountains in accordance with the Holloway Fire Emergency Stabilization and Rehabilitation (ESR) Plan. This EA of the Holloway Fire's ESR Plan analyzed potential impacts of stabilization and rehabilitation of burned areas on the human environment.

The Holloway Fire started on August 5, 2012, by lightning approximately 25 miles east of Denio, Nevada at T.41S., R.37E., SW $\frac{1}{4}$ NE $\frac{1}{4}$, Section 7 and was contained on August 25, 2012 after burning a total of 462,017 acres; 215,542 acres in BLM's Winnemucca, Nevada, District and 74,911 acres in Burns and 170,594 acres in Vale Districts in Oregon. The fire burned across Burns District between August 6 and 10, damaging seven grazing allotments and six Fenced Federal Ranges (FFR). Within the burned area there are four Wilderness Study Areas (WSA) making up 60 percent of the affected area; Red Mountain (20 percent), Mahogany Ridge (31 percent), Disaster Peak (5 percent), and Willow Creek (3 percent). One Research Natural Area (RNA) is located within Burns District, Holloway Fire perimeter. The 361-acre East Fork Trout Creek RNA, designated for its botanical values, encompasses a quaking aspen stand on the headwaters of East Fork Trout Creek.

COMPLIANCE

The attached EA (*Holloway Emergency Stabilization and Rehabilitation Plan*) (DOI-BLM-OR-B060-2013-0003-EA) is tiered to the Andrews Management Unit (AMU)/Steens Mountain Cooperative Management and Protection Area Proposed Resource Management Plan (RMP)/Final Environmental Impact Statement (FEIS), and the 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon FEIS. There will be no substantial broad societal or regional impacts not previously considered in these planning documents and relevant information contained therein is incorporated by reference. The Proposed Action has been designed to conform to the following documents, which direct and provide the framework for management of BLM lands within Burns District:

- Taylor Grazing Act (43 U.S.C. 315), 1934
- The National Environmental Policy Act (NEPA) (42 U.S.C. 4320-4347), 1970
- Federal Land Policy and Management Act (43 U.S.C. 1701), 1976
- Public Rangelands Improvement Act (43 U.S.C. 1901), 1978

- August 12, 1997 Standards for Rangeland Health and Guidelines for Livestock Management for Public Lands Administered by the BLM in the States of Oregon and Washington
- 1998 Burns District Noxious Weed Management Program EA (OR-020-98-05)
- 2007 Vegetation Treatments Using Herbicides on BLM lands in 17 Western States Record of Decision (ROD)
- 2010 Vegetation Treatments Using Herbicides on BLM Lands in Oregon ROD
- Greater Sage-Grouse and Sagebrush-steppe Ecosystems Management Guidelines (BLM-2000)
- Greater Sage-Grouse conservation assessment and strategy for Oregon (Hagen 2011)
- BLM National Sage-grouse Habitat Conservation Strategy (2004)
- 2011 Oregon Department of Fish and Wildlife Greater Sage-Grouse Conservation Assessment.
- Instruction Memorandum WO-2012-043, Greater Sage-Grouse Interim Management Policies and Procedures issued December 27, 2011.
- Clean Water Act (33 U.S.C. 1251 - 1376; Chapter 758; P.L. 845, June 30, 1948; 62 Stat. 1155)
- Clean Air Act, 42 U.S.C. 7470, et seq., as amended
- National Historic Preservation Act (16 U.S.C. 470)
- State, local, and Tribal laws, regulations, and land use plans
- Executive Order 12372, Intergovernmental Review
- Executive Order 13112, Invasive Species

DECISION

Having considered the Proposed Action, No Action Alternative, No Fence Alternative, Alternatives Considered but not Analyzed in Detail and associated impacts, and based on analysis in EA DOI-BLM-OR-B060-2013-0003-EA, it is my decision to implement the Proposed Action, except for the biological thinning tool, implementing the ESR plan and provide for the application of specific herbicides on noxious weeds located within the fire perimeter and in areas directly adjacent within Burns District. Additionally, a Finding of No Significant Impact (FONSI) found the Proposed Action analyzed in DOI-BLM-OR-B060-2013-0003-EA did not constitute a major Federal action that would adversely impact the quality of the human environment. Therefore, an Environmental Impact Statement was unnecessary and will not be prepared.

The Proposed Action will include the following elements:

1. **Weed Monitoring:** On the Burns District, as part of the District's standard operating procedures, any areas burned by wildfire are monitored for at least two years post-fire. All BLM-managed lands within and adjacent to the burn perimeter of Holloway fire will be surveyed for noxious weeds. Any weeds found will be treated using the most appropriate methods.
2. **Herbicide Application:** Where herbicide application is determined to be the most appropriate treatment for noxious weeds, use of herbicides will be in conformance with the labeled instructions. Only treatments allowable on Oregon BLM lands in conformance with Burns BLM authorized procedures will be used. Herbicides will be applied aerially or using ground-based sprayers. Herbicides, in addition to our currently available suite of products, include:
 - a. Imazapic (Plateau) at 6 ounces/acre (0.178 pounds/acre of active ingredient Imazapic) applied in the fall to treat cheatgrass. Application method will be by either vehicle based boom spraying (truck or All-Terrain Vehicle) or aerial spray. Aerial spray treatments for cheatgrass will be used on infestations 100 acres or greater and/or on smaller infestations where ground equipment cannot access the area.
 - b. Chlorsulfuron (Telar XP) at 1.3 ounces/acre (0.061 pounds/acre of active ingredient Chlorsulfuron) will be applied during the growing season to treat mustards and thistles. Application method will be by ground equipment with either vehicle based boom or spot sprayed.
 - c. Clopyralid (Transline) at 2/3 pint/acre (0.25 pounds/acre of active ingredient Clopyralid) mixed with either:
 - i. 2,4D at 1 quart/acre (0.95 pounds/acre of active ingredient 2,4D) to treat Canada thistle and knapweed during the bud to bloom stage, or
 - ii. Chlorsulfuron at 1.3 ounce/acre applied during the growing season to treat Canada thistle and knapweeds.

Application method will be by vehicle based boom or aerial spraying methods. Map 10 (in the EA) shows the treatment areas proposed for herbicide application.

Approximately 15,000 acres are contained within this treatment area (note-the private lands within this boundary will not be treated by BLM) and the map and acreage do not depict riparian/wetland buffers described in Appendix B of the EA due to the scale of the maps. The treatment area boundary shown on Map 10 was selected based on existing weed infestations within the fire boundary and roads and ways which travel through known weed infestations, along with wildlife and livestock use patterns. All of these routes act as vectors for transporting noxious weeds from existing weed sites to the burned area. It is important to understand this

proposal is not to treat all acres within this boundary, but only treat areas of existing or new weed infestations.

3. Aerial Seeding: Approximately 28,240 acres of the Holloway Fire will be aerially seeded. Aerial seeding will occur between winter 2013 and winter 2015 using native seed mixes and mountain big sagebrush.
4. Drill Seeding: Drill seeding 4,639 acres of the Holloway Fire will be done utilizing rangeland drills in early winter of 2012, and into 2013. A combination of native and desirable non-native species will be utilized in the seed mixes.
5. Wyoming big sagebrush planting: Wyoming big sagebrush seedling (plugs) planting will occur on approximately 1,833 acres where Wyoming big sagebrush mortality occurred due to the fire. Locations for the plug plantings will maximize the chances of success, and are based on soil survey data, vegetative communities present prior to wildfire and ecological site descriptions.
6. The United States Department of Agriculture (USDA), Agricultural Research Service (ARS) proposes to evaluate sagebrush restoration success of four different methods, as well as natural recovery at seven different elevations from 4,000 feet to over 7,000 feet, using a randomized block design. Treatments will include: 1) natural recovery (control), 2) broadcast seeding of sagebrush, 3) broadcast seeding of sagebrush followed by roller-packing, 4) sagebrush seed pellets, and 5) planting sagebrush seedlings. All sagebrush used in the study will be Wyoming or mountain big sagebrush based on the pre-fire vegetative community.
7. Bitterbrush Seeding: Approximately 2,186 acres of bitterbrush will be hand seeded where bitterbrush occurred pre-fire. This will be accomplished at a ten-foot spacing using a specialized hollow tube to simulate caching by borrowing animals.
8. Erosion Control Structures: Up to 200 erosion control structures (hillslope or in channel treatments) will be placed within or upslope of appropriate drainages. Structures will be constructed of weed-free straw or rock, placed on the surface (no ground disturbance) and anchored with metal posts to resist movement. Height, width, and position will depend on channel morphology and potential for water movement. Contour wattles and straw bale check dams will be constructed according to Natural Resource Conservation Service (NRCS) guidelines (USDA 2004 and USDA 2012). These structures will be located in critical areas of high risk where the threat of sedimentation will cause problems to downstream values. Straw bale check dams will only be placed in small drainages (ephemeral or intermittent) with a channel gradient of less than 30 percent; they will not be placed in any incised drainages. Contour wattles will be placed on slopes 50 percent or less. Specific types and locations of erosion control structures will be determined by a BLM Hydrologist, familiar with erosion in arid areas.
9. Road Maintenance/Water Diversion: Water diversions will stabilize approximately 40 miles of roads within and adjacent to the burned areas damaged by frequent passage of

heavily laden firefighting vehicles and are threatened to varying degrees by erosion. Roads and ways along the western face of the Trout Creek Mountains are characterized by steep terrain (32 percent of the area is between 31 and 60 percent slope) and highly confined valleys. Unless otherwise specified, road maintenance would consist of spot maintenance in damaged areas. Roads would be returned to a condition similar to the condition prior to the fire. This may include grading, grid rolling, and the placement of spot rock. Where necessary, roadside ditches would be spot cleaned in order to remove sediment and ash that accumulates within the ditches. Spot cleaning of ditches will be necessary to ensure runoff is able to continue flowing through ditches.

10. Fence Maintenance and Construction: Approximately 127 miles of 4-wire fence will be evaluated and reconstructed as necessary. Of these miles of fence to be reconstructed, approximately 60 miles fall on the boundary of, cross private property or exist as part of an FFR making them important in managing boundaries during reseeding and stabilization efforts. These fences are included since they were originally constructed by the BLM and have valid Rangeland Improvement Project System (RIPS) numbers, and are needed by the BLM to properly control livestock within the respective allotments. Private/BLM boundary fences will be the responsibility of the private landowner, not BLM and will be clarified with each individual permittee /landowner. Fence reconstruction will include the construction of replacement H-braces and rock cribs as needed. In all fence reconstruction, metal materials will be used to the extent possible.

Three new temporary protection exclosures, each 160 acres or less, will be constructed to protect the areas hand seeded with bitterbrush, keeping out livestock and wildlife. The objective is to allow the bitterbrush to mature to approximately 8-10 inches in height, at which time it will be able to withstand browsing (NRCS Plants Database), and to provide islands of seed sources from which future plants may establish.

Approximately 6 miles of new, temporary fence will be constructed to keep livestock out of the burned portion of Sandhills Allotment. The fence will connect at the north to an existing fence line near the public/-private boundary in Hendricks FFR (T.40S., R.36E., Section 34) and transit south to connect with the existing fence in T.41S., R.36E, Section 21 following the fire perimeter west of the burn and the reseeded area (See Map 9B). Removal of temporary protection fences will occur once resource objectives are met.

Temporary gates/and or cattleguards will be installed at road crossings to allow management of domestic livestock.

11. Range Improvement Reconstruction: Thirty-seven spring developments were damaged to some degree during the wildfire. These developments will be reconstructed restoring the functionality of these water sources for wildlife as well as livestock. Repairs will range from repairing and/or completely rebuilding fence to replacing plastic piping that melted during the fire and replacing headboxes. The use of a backhoe will be required for replacing headboxes or pipe. Because of the remoteness of many springs, not all have been surveyed and the extent of the damage on all springs has yet to be evaluated.

12. **Effectiveness Monitoring:** Vegetation monitoring will be conducted for three years after treatments are applied. Sagebrush and other shrub cover will be measured using the line-intercept method on three, 66 foot transects. The transects will be placed at 10, 15, and 25 foot points along the 33-foot side of the treatment plot. Sagebrush and other shrub density will be measured by counting all sagebrush rooted inside the 33 by 66 foot plot. Average sagebrush height will be determined by measuring the height of 20 randomly selected sagebrush plants per plot. Sagebrush biomass production per plot will be estimated using height and two perpendicular diameter measurements of the sagebrush canopy (Davies et al. 2007) from 20 randomly selected sagebrush plants. Site characteristics will be measured at each block. Elevation, longitude, and latitude will be determined using topographical maps. Aspect will be determined using a compass. Slope will be measured with a clinometer. Soil depth will be determined by digging a soil pit to a restrictive layer. Soil texture will be determined using the hydrometer method for the 0-8 inch depth and 8-16 cm depth. Precipitation will be determined from PRISM precipitation maps. Average, minimum, and maximum temperatures, Ecological Site, and frost free days will be determined for each block from NRCS Soil Surveys. Resin membrane probes will be used to estimate plant available soil nutrients. This monitoring will show if the seeding was successful, the status of native plants, medusahead, and noxious weeds, and whether the soil surface is being protected.

Design Elements of the Proposed Action

Project Design Elements (PDEs) were developed to aid in meeting project goals and objectives. These features are nonexclusive and are subject to change based on site-specific terrain characteristics (topography and vegetation). Changes, additions or deletions will be made through coordination with appropriate BLM specialists and approved by the Field Manager.

- *The Industrial Fire Precaution Levels will be followed during construction, where appropriate.*
- *Cultural Clearances: Pursuant to Section 106 of the National Historic Preservation Act, the lead Federal agency must take historic properties into account prior to implementing Federal undertakings. Cultural resource inventories were conducted on areas proposed for ground disturbing stabilization and rehabilitation treatments (fence construction, drill seeding, etc.). These inventories were conducted prior to implementation of the proposed ground disturbing stabilization and rehabilitation treatments in order to identify and avoid any cultural resources needing protective measures and those areas will be avoided.*
- *Inventories will be in accordance with the State Protocol Agreement between the Oregon BLM and the Oregon State Historic Preservation Office (SHPO). All cultural resources will be recorded on agency approved site forms and plotted on maps. Resources, except those previously determined Not Eligible by the agency and SHPO will be flagged for avoidance during stabilization and rehabilitation activities. Flagging will be removed as soon as possible after stabilization and rehabilitation treatments to minimize the potential for looting and vandalism. New fence construction will avoid cultural sites.*

- *The risk of noxious weed introduction will be minimized by ensuring all equipment (including all machinery, 4-wheelers, and pickup trucks) is cleaned prior to entry to the sites, minimizing disturbance activities, and completing follow-up monitoring, to ensure no new noxious weed establishment occurs. Should noxious weeds be found, appropriate control treatments will be performed in conformance with the 1998 Burns District Noxious Weed Program Management EA/DR OR-020-98-05 or subsequent decision. Herbicide use will conform to federally approved manufacturers' herbicide labels as well as the streamside, wetland, and riparian habitat herbicide restrictions. Herbicide will not be used on any special status plant populations. Appropriate mitigation measures contained in Table 2 of the Final Vegetation Management Environmental Impact Statement and Environmental Report (2007), or its successor, will be utilized as a part of the project design.*
- *The Burns and Fort McDermitt Paiute Shoshone Tribal Councils will be notified in advance of any herbicide spraying so that individuals gathering roots in the area where the spraying had occurred will know that they should stay clear of the area.*
- *All proposed wire fences, constructed within 1.25 mile of a lek or known seasonal use area (i.e. spring exclosures), will include plastic reflective clips on the wire to enhance visibility and reduce potential mortality from sage-grouse hitting the fence.*
- *Boundary fences will have been inspected, repaired or replaced and be in good condition prior to turnout into pastures scheduled for use.*
- *Fences will be constructed to BLM specifications for a 4-strand barbed wire fence, including 22-foot line post spacing. Wire spacing will be 16 inches, 22 inches, 30 inches, and 42 inches up from the ground, with a smooth bottom wire. Anti-collision flashers will be installed in appropriate locations.*
- *All seed will meet BLM standards for germination and purity.*
- *Construction will occur in early spring or in late summer or early fall to avoid adverse effects to nesting birds.*
- *Prior to final inspection, all construction trash and excess debris will be removed from the public lands and disposed of at a site approved by the BLM Contracting Officer.*

COMMENTS RECEIVED

On October 10, 2012 the BLM hosted a field trip to the Burns District portion of Holloway Fire. The field trip included representatives from the Oregon Natural Desert Association, The Nature Conservancy, Oregon Department of Fish and Wildlife (ODFW), USDA ARS and the United States Fish and Wildlife Service (USFWS; Ecological Services). Participants were provided with a general idea of what rehabilitation efforts the BLM would plan for, including seeding areas, methods, and possible species. Discussion on the need for soil stabilization and rehabilitation in the area and other concerns occurred, along with questions from participants.

Concerns were voiced regarding status and proposed activities in WSAs and Citizen Proposed WSAs including seed choices in the Antelope Seeding Pasture, construction of temporary protection fence, and installation of three fence exclosures. Also of concern was the timing of herbicide use for the most effective control of cheatgrass, the amount of resources required for weed monitoring, and prioritization of seeding to accommodate wildlife needs/requirements.

As a result of this meeting, a third alternative was added to analyze the effects of rehabilitation and stabilization without the use of new temporary fencing, including the use of three exclosures in the bitterbrush seeding treatment area.

In addition to the field trip, affected permittees have been met with on an individual basis and meetings are ongoing. Discussions with other governmental agencies, including ODFW, as well as environmental organizations, are ongoing.

The Fort McDermitt Paiute Shoshone Tribe reservation is located just east of the Holloway Fire in McDermitt, Nevada. The tribal council has expressed interest in projects occurring within the Burns District, especially on lands near their reservation.

RATIONALE

This Decision best meets the Purpose and Need for the action because it provides the greatest likelihood of successfully establishing a ground cover of perennial vegetation to 1) compete with cheatgrass for available site resources to reduce the likelihood of burned areas converting to invasive annual grass dominance; 2) stabilize soils after the first growing season and reduce the potential for accelerated soil erosion associated with invasive annual communities; 3) reduce the likelihood of these areas experiencing a reduced fire return interval associated with invasive annual grass dominance; 4) coexist with and promote reestablishment of native vegetation; 5) result in less time needed for big sagebrush to reach sufficient cover percentages to begin to provide usable habitat for sage-grouse as both hiding/nesting cover and as a critical food source during the winter season, and 6) reduce the likelihood of new weed establishment or expansion of existing weed infestations. In addition, the Decision was based on consultation with affected grazing permittees, other agencies (ODFW, USFWS, etc.), public comments (gathered at field trip and personal communications), and conformance with applicable laws and regulations.

Aerial Seeding

The areas proposed for aerial seeding treatments (28,240 acres) are unsuitable for drill seeding due to rockiness, slope, and the potential presence of cultural sites. Using the aerial seeding method in these areas will help stabilize the soils on slopes by establishing protective ground cover of native perennial vegetation, protecting the soils from wind and water erosion and stabilizing hillsides. Seeding the rocky upper elevations allows for the seed bank to move downhill naturally providing a more natural appearance and continuity of natural processes. Aerial seeding mountain big sagebrush will accelerate the reestablishment of a critical component of sage-grouse habitat. All species proposed for aerial seeding are native and are consistent with requirements set forth in BLM's 6330 Manual "Management of Wilderness Study Areas".

Drill Seeding

Following fires, resource availability increases on the site, including an increase in available nitrogen, which annual species are able to utilize quicker than perennial species (Davies et al. 2007, Stubbs and Pyke 2005, Blank et al. 1994, 1996, Monaco et al. 2003, Pellant 1996). This is especially true in the early spring since annual grasses begin actively growing while perennial species are still dormant or just beginning to initial growth (Pellant 1996). Because of the high concentration of cheatgrass in the western portion of the fire, drill seeding (4,639 acres) will have the highest rate of success in off-setting the potential of converting the area to an annual grassland (Kirk Davies and Chad Boyd, USDA ARS Pers. Comm. 2012). Two seed mixes will be used, one containing crested wheatgrass mixed with native species, to be used in a pre-existing crested wheatgrass seeding, and the second containing only native species.

The crested wheatgrass/native drill area (1,424 acres) was seeded twice (1966-67, pre-Federal Land and Policy Management Act and again in 1990), a portion of which was included in Red Mountain WSA. Red Mountain WSA acknowledged this seeding in the Wilderness Study Report (October 1991, p. 216). The remaining drill seed area, 3,215 acres, falls completely within Red Mountain WSA and will utilize native seed in order to return the area to its pre-fire natural vegetative community. Native plants provide a valuable seed source adapted to the local environment, which further enhances the ability of the native plant community to recover (Leger 2008) and provide a more diverse habitat for migratory birds.

By drill seeding, appropriate seed mixtures will be planted within parameters optimal for their growing success, increase the establishment rate, and consequently improve the chances of seeded vegetation to outcompete cheatgrass within a timeframe that will narrow the window of recovery and reduce soil and biological soil crust loss. Many burned sites, particularly those in the Great Basin and Intermountain regions, require revegetation to stop exotic plant invasion, and most techniques require some soil surface disturbance. This may not appear consistent with recovery of biological crusts. However, failure to treat sites can result in irreversible dominance by annual species (such as cheatgrass), which prevents the return of well-developed biological soil crusts (BLM Tech Reference 1730-2) and native vegetation. Drill depth and seed tubes will be adjusted and/or pulled to create an inconsistent pattern thus reducing impacts to visual resources and a chain will be dragged behind the drill machine to knock down the berms of the furrows. Over time, natural weathering processes make the disturbed areas unnoticeable to the casual observer.

Wyoming Big Sagebrush Plugs

Big sagebrush is a key component to the survival of sage-grouse and other wildlife species and is important habitat for several species of migratory birds, including several Birds of Conservation Concern. Post-burn recovery periods for big sagebrush can take years because it must reestablish from seed. In the shrub steppe environment, stands of Wyoming big sagebrush (lower elevations of the Holloway Fire) may not recover after 50 to 75 years. Fire kills sagebrush plants and sagebrush seeds in the soil, and suppresses recovery because Basin, Mountain, and Wyoming big sagebrush are not root-sprouting shrubs (Tisdale & Hironaka 1981). Post burn recovery periods for these three big sagebrush taxa can be long, especially following large wildfires, because they must reestablish from seed. For example, Baker (2006, 2011) approximated post fire recovery for Mountain big sagebrush from 35–100 or more years

and Wyoming big sagebrush from 50–120 years based on a combination of cover and density values from various studies. Planting plugs is expected to accelerate the recovery effort because it typically has a higher survival rate than seeded sagebrush and decreases the period required to achieve reproductive maturity. Additionally, less time is needed for Wyoming big sagebrush to reach sufficient cover percentages to begin providing usable habitat for sage-grouse and pygmy rabbit as both hiding/nesting cover and as a critical food source during the winter season. Seedling planting will occur in areas where Wyoming big sagebrush occurred prior to the fire, has the greatest chance of survival and is based on ecological site descriptions, soil types and on-the-ground knowledge. They will provide “islands” for future seed sources, further improving critical habitat.

Bitterbrush Hand Seeding

The Holloway fire burned through an old stand of antelope bitterbrush. The preservation of this stand was the number one priority while battling the fire because of its maturity and seed potential. Hand seeding bitterbrush will provide a greater establishment because rate and method (broadcast, cache, etc.) can be manipulated based on terrain and burn severity. By hand seeding, and thus augmenting the return of bitterbrush communities, there will be a reduction in the length of time habitat is unavailable to affected species. Further, a perpetual benefit of “bitterbrush islands” is an expansion of the plant communities and provides a future seed source for that and other sites.

Bitterbrush is palatable to livestock and wildlife and is important winter range forage for mule deer where availability of winter range is a limiting factor. The affected area provided both winter and summer range for many wildlife species. Mule deer are widespread throughout the fire and surrounding area; approximately 46,516 acres of mule deer habitat burned in the fire.

Three exclosures will be erected to prevent browsing by wildlife and livestock when they are allowed back into the area. These exclosures will provide a future seed source once the stands reach maturity. Because this will be done over several years, there could be minor impacts to newly established vegetation, but because seed will be sown by hand, impacts can be minimized and areas avoided if necessary to prevent undue disturbance. Exclosure construction will follow the conservation guidelines designated in the Oregon Sage-Grouse Conservation Strategy (Hagen 2011).

Erosion Control Structures

Native seed persists in the soil and preventing its removal will increase the establishment rate of native species and prevent the expansion of noxious and invasive weed species. Soil stabilization measures such as check dams and silt basins will prevent valuable seed laden top soil from leaving the site and prevent damage to necessary travel routes reducing driving hazards and risks to human safety. Silt basins will be used in areas where check dams are not expected to stand up to the high water events likely to occur during the spring runoff and summer storms. Straw bale check dams will be installed in stream channels nearby roads to filter fine particulates during the rehabilitation period.

The structures will be removed once vegetation is adequately holding back the fine materials that may clog coarse materials forming the grade dips.

Road Maintenance

Roads on and around the Trout Creek Mountains (Andrews/Steen RMP, Appendix pg. 220, Map 12) are used by local landowners, sportsmen, hikers, campers, and for administrative use. Damage caused by suppression efforts of the Holloway Fire caused deterioration of road surfaces leading to, and throughout, the lower western portion of Trout Creek Mountains. Frequently, these roads are cut into hillsides and are in close proximity to stream channels and crossings. Heavy use of roads during suppression efforts throughout the entire burned area caused pulverization of the roadbed to the point of decay to a talc like state with pockets of dust exceeding 12 inches thereby creating a safety hazard for passenger vehicles as well as four-wheel drive vehicles.

Because of the depth, large rocks can be hidden below the dust surface and may cause extensive damage to vehicle undercarriages. Even full-sized pickup trucks with four-wheel drive are prone to being pulled out of route by dust channels similarly to driving through deep water, slush, or snow. During periods of no wind, disturbed dust can remain suspended in air for several minutes over reaches exceeding a mile reducing visibility to near zero for following vehicles.

Sections of the roadbed have been compromised to the point where low amounts of moisture may accumulate into large, deep puddles. This creates a driving hazard and is expected to result in erosion both alongside and across the roadbed. Large amounts of runoff and associated soil movement out of drainages and across roadways creates a hazard to human safety.

Road maintenance within and directly adjacent to the fire perimeter will occur within the boundary of the existing roadbed and will not impact soils or soil crusts because all work will occur within the existing roadbed. Maintenance and stabilization activities will reduce creation of new or widened roads in efforts to get around obstacles created by road deterioration and consequently reduce risks to public health and safety while ensuring access by the public. Spot cleaning of ditches will ensure runoff is able to continue flowing through ditches and culverts, reducing the probability of water pooling and damaging roads.

Fence Maintenance and Construction

The Holloway Fire burned through allotment and pasture boundary fences needed to manage rotational grazing within specific pastures and time periods outlined in management plans for each allotment.

Repair of these fences is necessary to keep livestock out of the burned and seeded areas until objectives are met and to allow pre-fire management to occur once livestock grazing resumes. Also, by maintaining fences of pastures adjacent to the burned area, unburned BLM and private land pastures will continue to be grazed as scheduled without livestock moving into the burned areas.

Without the maintenance of existing fences damaged by the fire, livestock use following the rest period will be unmanageable.

Fence repairs will prevent livestock from over utilizing any unburned area within the perimeter of the fire and impacting resource values. Livestock and wildlife tend to congregate in areas

where vegetation and water are readily available and the unburned areas provide these resources, especially with the surrounding vegetation and water sources no longer available.

Approximately 127 miles of 4-wire fence will be reconstructed as needed including replacement of H-braces and rock cribs but may be as extensive as full fence replacement, depending on the severity of damage. In all fence reconstruction, metal materials will be used to the extent possible to prevent future issues.

All fences will be outside of the 0.6-mile distance from leks to reduce collision hazards to flying birds (sage-grouse) as designated in the conservation guidelines in the Oregon Sage-Grouse Conservation Strategy (Hagen 2011).

Temporary Fence

Approximately 6 miles of new temporary protection fence will be constructed to keep livestock out of 25 percent of Maggie Creek and Road Pastures burned in Sandhills Allotment. Gates or cattleguards will allow continued passage of vehicles while the fence is in place. Construction of the temporary fence will allow utilization of the unburned portions of the pastures reducing accumulation of fine fuels in the unburned area for the duration of the grazing closures. The fence will be placed with a 1/4 - 1/2 mile buffer between the burned and unburned area to prevent livestock from straining against the fence in order to access newly recovering vegetation. Once resource objectives are met and the fence is no longer needed, fences and cattleguards will be removed.

Three new temporary protection exclosures, each 160 acres or less, will be constructed to protect the areas within the hand seeded bitterbrush treatment area. The exclosures will be up to eight feet tall to prevent wildlife from jumping over and anchored to prevent wildlife from going under it. Exclosure fence construction may include the construction of H-braces and rock cribs as needed. Exclosures will ensure that islands of bitterbrush reach a stage where they are no longer vulnerable to impacts from browsing by wildlife and livestock (when they are allowed back into the allotments) thus providing necessary winter forage as well as a future seed source.

All new, temporary fencing will be greater than 0.6 miles from known sage-grouse leks. If the fences, including the bitterbrush exclosures, fall within 1.25 miles of a lek, reflective markers will be installed as designated by the conservation guidelines in the Oregon Sage-Grouse Conservation Strategy (Hagen 2011, IM-2012-43).

Removal of the temporary exclosure fences, after objectives have been met, will allow normal access to both wildlife and livestock once bitterbrush has reached a stage where browsing will no longer impact the success of the seeding.

Range Improvements (repair springs, etc)

Repairing springs and troughs will provide water sources in areas where water is in short supply thus drawing livestock (when they are allowed to return to the allotments) and wildlife to other parts of the allotments and lessening impacts to more reliable water sources. Repairing spring exclosure fences will prevent over utilization of riparian vegetation.

Construction of sediment traps and cleaning of water catchment basins will prevent water holding facilities from filling with sediment which reduces water holding capacity. These water sources are necessary for livestock and wildlife throughout the year and aid in distribution across pastures. Catchment basins provide water to those areas with limited water, reducing the distance wildlife and livestock must travel to this valuable resource. They also provide a means to distribute livestock throughout an allotment in an effort to reduce high impact use areas. If catchment basins are not cleaned, wildlife and livestock will congregate in areas of reliable water which will lead to over-utilization in concentrated areas of pastures and allotments.

Herbicide Application

Research (Davies, Sheley, 2011; Davies, 2010) has shown that herbicide treatment has the highest rate of success in the control of invasion or migration of undesirable annual grasses and noxious weeds. Herbicide application will allow site-specific control of invasion within identified boundaries followed by monitoring of treatment success. Plateau (*Imazipic*) has been proven as the best choice for treatment of invasive annual grasses and will be among the herbicides in the overall suite of chemicals used in the weed treatments prescribed for the Holloway Fire. None of the currently authorized herbicides are selective for annual grasses, such as medusahead and cheatgrass, which are two of the biggest threats to persistence of sagebrush steppe and its associated wildlife community (Hagen 2011).

Areas outside the perimeter that may be vectors for invasion within the boundary will be treated using the best available methods, including the use of herbicides. These areas include those which were used for the purposes of fire suppression (access roads, fire breaks, staging areas) as well as infested areas directly adjacent to the fire boundary that will provide seed sources for future invasions.

Early Detection Rapid Response (EDRR) will be used to survey and treat invasive and noxious weeds within the boundary of the Holloway fire, as well as along those routes used to access the fire during suppression efforts, in order to prevent the spread of existing weed sites and prevent the establishment of new weed species. The EDRR is an effective tool because it provides treatment, using the best available methods, of weed sites before they become ecological and economic issues. It also reduces the amount of chemicals, when chemicals are the best available option, needed to control an infestation.

In areas of heavy cheatgrass infestations, where spread due to newly available resources as a result of the fire is highly probable, broadcast herbicide treatment is the best method for preventing cheatgrass spread. Preventing the germination of cheatgrass during the late fall, early winter and spring will allow native perennial grasses to establish and dominate the understory and decrease the amount of time needed for recovery of valuable sage-grouse habitat (Davies, Sheley, 2011).

Agricultural Research Service Study Plots

The study plots proposed by the ARS would serve the public in providing a better understanding of planting methods for woody species necessary for wildlife needs in the post fire environment where a quick and dependable return to pre-fire conditions are necessary to maintain diverse species populations.

The No Action Alternative (Alternative A) was not selected because it does not help with establishment and spread of noxious weeds in areas of the fire unlikely to recover naturally, nor would it allow for treating noxious weeds with the most effective herbicides within existing weed infestations adjacent to each fire.

Fences would not be constructed; therefore livestock grazing would occur in burned areas, resulting in impacts to recovering native forbs and grasses, leading to poor quality forage, less vegetative diversity within the fire area, and the greater likelihood of future fires. Under this scenario, Wyoming big sagebrush plugs will not be planted leading to increased recovery times (potentially 100 years or more) in order to return to its former vigor and cover and once again provide usable habitat for sage dependent species, such as sage-grouse. This will lead to a long-term (potentially >100 year) downsize in localized populations of sage-grouse, potentially contributing to the need for listing. Fences will not be repaired. Without the ability to control livestock there will be less opportunity to protect burned areas from livestock grazing until vegetative objectives are met.

Seeding treatments would not occur allowing invasive annual grasses to dominate the western portion of the fire perimeter, potentially converting it to an annual grassland and removing valuable wildlife habitat, including that needed by sage-grouse. This would provide a vector for invasive grasses and other noxious weeds to penetrate farther into the Trout Creek Mountains and further degrade important wildlife habitat leading to a decrease in biodiversity throughout the region. It will be difficult, if not impossible, to stabilize soils and reduce offsite soil loss due to the lack of desirable perennial vegetation to hold soils in place and protect the remaining biological soil crusts prior to objectives being met. There will be an increase in fire return intervals due to fine fuel build up from annual grasses. Increases in recovery time for antelope bitterbrush and mountain big sagebrush will occur with higher risks of noxious weed and invasive annual grass infestations.

The No Fence Alternative was not selected because although in the short term, the lack of fences and potential collisions with them is beneficial to sage-grouse, in the long term the lack of any viable way to control ungulate populations and browse activity (both domestic and wild) until vegetative objectives are met would result in lower diversity of plants and insects that are important components of sage-grouse lifecycle. There would be a greater likelihood of weed infestations that treatments would be less able to control, resulting in a monoculture of invasive grasses that would be more susceptible to future large wildfires and reducing the ability for big sagebrush to grow and mature to provide hiding and nesting cover for sage-grouse. This alternative is not expected to reconstruct or enhance sage-grouse habitat in the fires interior.

By not constructing the temporary protection fence, livestock would not be kept out of the burned portion of the Sandhills Allotment, the entire pasture would have to be rested or herding would have to be utilized in order to graze the unburned portion of the allotment. Only 25 percent of the allotment burned measurably, with only 17 percent of the burned area burning at moderate to high levels. The burned area was concentrated in the eastern portion leaving the western portion (70 percent) of the Sandhills Allotment completely unburned.

The No Fence Alternative (Alternative C) would not construct six miles of temporary fence in the Sandhills allotment to provide a buffer between the burned and unburned areas and allow the burned areas to recover, while protecting the unburned portion of the allotment from future wildfire. Without the temporary exclosures fences there would be no protection from browsing during the critical growth window for some areas within the bitterbrush stand seeding treatment area. Without the exclosures, the entire area planted will be at risk for over utilization by wildlife and livestock (once they are allowed to return) and no bitterbrush islands would be created for future seed sources.

In addition I have selected Alternative B: Proposed Action – Full Implementation of the Holloway Fire Emergency Stabilization and Burned Area Rehabilitation Plan, without the biological thinning tool.

ADMINISTRATIVE REMEDIES

Authority for the stabilization and rehabilitation wildfire decision is found under 43 Code of Federal Regulations (CFR) 4190.1 Effect of wildfire management decision. “(a) Notwithstanding the provisions of 43 CFR 4.21(a)(1), when BLM determines that vegetation, soil or other resources on the public lands are at substantial risk of wildfire due to drought, fuels buildup, or other reasons, or at immediate risk of erosion or other damage due to wildfire, BLM may make a rangeland wildfire management decision effective immediately. Wildfire management includes but is not limited to: (2) projects to stabilize and rehabilitate lands affected by wildfire.” Under these regulations, implementation of projects to stabilize and rehabilitate lands such as seeding, planting, erosion control, road maintenance/protection, and fence maintenance/construction will be effective upon the date of the authorized officer's signature.

The administrative authorized for application of chemicals falls under the following appeal procedures.

APPEAL PROCEDURES

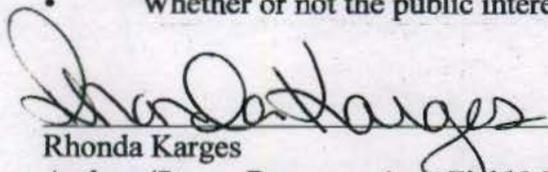
This decision may be appealed to the Interior Board of Land Appeals (IBLA), Office of the Secretary, in accordance with regulations contained in 43 Code of Federal Regulations (CFR), Part 4 and Form 1842-1. If an appeal is filed, your notice of appeal should be filed with the Andrew Resource Area Field Manager, Burns District Office, 28910 Highway 20 West, Hines, Oregon 97738, within 30 days following receipt of the final decision. The appellant has the burden of showing the decision appealed is in error.

A copy of the appeal, statement of reasons, and all other supporting documents should also be sent to the Regional Solicitor, Pacific Northwest Region, U.S. Department of the Interior, 805 SW Broadway, Suite 600, Portland, Oregon 97205. If the notice of appeal did not include a statement of reasons for the appeal, it must be sent to the Interior Board of Land Appeals, Office of Hearings and Appeals, 801 North Quincy Street, Arlington, Virginia 22203. It is suggested appeals be sent certified mail, return receipt requested.

Request for Stay

Should you wish to file a motion for stay pending the outcome of an appeal of this decision, you must show sufficient justification based on the following standards under 43 CFR 4.21:

- The relative harm to the parties if the stay is granted or denied.
- The likelihood of the appellant's success on the merits.
- The likelihood of immediate and irreparable harm if the stay is not granted.
- Whether or not the public interest favors granting the stay.



Rhonda Karges
Andrew/Steens Resource Area Field Manager

3/1/13
Date