



United States Department of the Interior

BUREAU OF LAND MANAGEMENT
VALE DISTRICT
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Vale, Oregon 97918
<http://www.or.blm.gov/Vale/>



Documentation of Land Use Plan Conformance and NEPA Adequacy Long Draw (G1HG) Fire Emergency Stabilization and Rehabilitation Plan DNA

Office: Jordan Field Office

Tracking Number: V060-2012-037

Proposed Action Title/Type: Long Draw Fire Emergency Stabilization and Rehabilitation Plan

Location: See attached map Maps 1 and 2, ESR Plan

A. Describe the Proposed Action

Background

The proposed action is described in the *Post-Fire Recovery Plan, Emergency Stabilization and Burned Area Rehabilitation, Long Draw Fire (G1HG), BLM Vale District Office, OREGON STATE OFFICE* (hereafter called ESR Plan, September 7, 2012). Specifically, this Documentation of National Environmental Policy Act (NEPA) Adequacy evaluates proposed actions for emergency stabilization and rehabilitation of burned areas within the Long Draw fire. Since the completion of the ESR Plan, funding and seed limitations caused the Vale BLM to reduce the intended acreage proposed for seeding implementation. To address the potential for additional funding and seed becoming available, this document evaluates proposed actions in the entire ESR Plan for adequacy of existing NEPA analysis and conformance with the Final Environmental Impact Statement (FEIS, April 2001) for the Southeastern Oregon Resource Management Plan (SEORMP) Record of Decision (ROD, September, 2002).

The Long Draw fire was ignited by lightning on July 8, 2012. Extreme fire behavior and dry conditions ultimately burned over 558,000 acres. Approximately 8,000 acres of the fire burned private land holdings and over 200 acres of State of Oregon land. The fire was declared contained on July 15th, and controlled on July 30th.

The Long Draw fire became the largest fire to burn on the Vale District BLM in more than 30 years of documented fire history. Within the final burned area, the largest recorded fires to have burned previously were the Jackies Butte fire of 2001 (67,000 acres) and the Indian Fort fire of 1983 (53,000 acres). Fire is a natural part of the environment in this part of the Vale District. This area regularly receives a high number of natural fire starts (lightning-caused). The northeast sector of the area burned by the Long Draw fire has a high frequency of fire, but those past fires have largely been controlled quickly, before the burned area became extensive.

The Long Draw fire behavior and eventual size, while unusually large as a result of the high winds and dry conditions, was fast-moving and of short duration, leaving large mosaic areas of unburned vegetation, low-intensity heat, and erratic edges of the fire in many sectors of the burn.

This type of resulting burn is common in the sage-steppe environment of the Great Basin ecosystem.

The actions considered in this document include those normally considered following wildland fire to stabilize and rehabilitate resources impacted by fire. Two actions are considered in greater detail for NEPA adequacy, due to the extensive area impacted by the fire, and hence affected by the proposed actions: (a) construction of temporary fencing to enable resting of parts of specific pastures from livestock grazing, and (b) implementation of seeding of burned areas to rehabilitate priority areas.

Temporary Fence Construction:

Burned areas will be closed to livestock grazing as specified in the SEORMP ROD, page 40. Pastures that were completely or almost completely burned will be closed to grazing in whole while pastures that were not completely burned will be fenced off to livestock grazing. Seven pastures were identified to be fenced along the burned perimeter while allowing authorized grazing to continue in the unburned portion (see Map 8, Revised ESR Plan). This will require about 81 miles of temporary fencing.

Rangeland Vegetation, Objective 1: “Restore, protect, and enhance the diversity and distribution of desirable vegetation communities, including perennial native and desirable introduced plant species. Provide for their continued existence and normal function in nutrient, water and energy cycles” (ROD, Page 39).

Management Actions for Rangeland Vegetation: “Areas burned by wildland fire, including those subsequently rehabilitated will be rested from grazing for one full year and through a second growing season at a minimum, or until monitoring data or professional judgment indicate that health and vigor of desired vegetation has recovered to levels adequate to support and protect upland function (ROD, Page 40)

Seedings

78,546 acres within the burned area would be seeded with grasses using a rangeland drill (Map 4, ESR Plan). 28,366 acres would be broadcast seeded with grass seed and then a heavy anchor chain will be pulled over the seeded area to improve contact between soil and seed (Map 4, ESR Plan). Another 85,000 acres have been identified for aerial seeding of sage brush species (Maps 4 and 5, ESR Plan). 67,000 acres in and around leks will be planted with Wyoming sage brush seedlings.

Rangeland Vegetation, Objective 1: “Restore, protect, and enhance the diversity and distribution of desirable vegetation communities, including perennial native and desirable introduced plant species. Provide for their continued existence and normal function in nutrient, water and energy cycles” (ROD, Page 39).

Management Actions for Rangeland Vegetation: “Seedings will be implemented with

appropriate mixes of adapted perennial species. Species mixes will be determined on a site-specific basis dependent on the probability of successful establishment, risks associated with seeding failure, and other management considerations. Preference will be toward the use of native species, though nonnative species may be used when better adapted to out-compete established annual species. Use of competitive native species or desirable nonnative species will be emphasized in seedings within sites moderately and highly susceptible to degradation. Treatment configuration will emphasize the maintenance of natural values as consistent with other resource management objectives.” (ROD, Page 40)

Planned Actions

The area burned by the Long Draw fire is in immediate risk of erosion and other damage due to the fire and is in need of management actions to stabilize and rehabilitate those lands to: protect resources, promote recovery of desirable vegetation and prevent invasion of undesirable vegetation including noxious weeds, restore wildlife habitat, and generally to facilitate site recovery. This can be achieved by the treatments proposed and described in detail in the Long Draw Emergency Stabilization and Rehabilitation Plan (ESR Plan), which are summarized below:

- Ground-based rangeland drill seeding of native and appropriate species of non-native perennial grasses, and sagebrush in areas (see Map 4, ESR Plan) identified through interdisciplinary team analysis as having a high potential to: successfully germinate and establish root structure, protect areas from establishment of non-native invasive vegetation or noxious weeds, and/or to rapidly stabilize sites from erosion potential due to loss of vegetation. Rangeland drills are modified in some areas, according to soils and site potential, as well as to minimize impacts to resources. Seed mixes were selected based on seed species availability and site potential.
- Ground-based sage brush seeding in priority areas were identified on lands near active Greater Sage-Grouse leks (mating grounds, see Map 5, ESR Plan). Seeding method proposed is by pulling wheeled seed hoppers with a trailing cultipacker behind to imbed sagebrush seed directly into soil.
- Additional areas (see Map 5, ESR Plan) are targeted near leks to manually collect (selectively pruning branches with developed seed inflorescences in October and November) and scatter Wyoming big sagebrush seed from adjacent, unburned areas to expedite sagebrush habitat restoration.
- Sagebrush seedling plantings (see Map 5, ESR Plan) were also identified near leks to further encourage habitat restoration. Plantings will be conducted after year one, as seedlings become available.
- Aerial seeding of sagebrush (see Map 4, ESR Plan) in areas with potential for germination, outside of drill seeding areas, in identified Greater Sage-Grouse habitat. In some areas, seed will be incorporated into seedbed through chaining.
- Rest parts or all of burned pastures within authorized grazing allotments from livestock grazing during a period necessary for establishment and recovery of health and vigor of desired vegetation.
- Approximately 32 miles of temporary protective fence would be constructed, to separate the burn area from unburned portions of affected pastures.
- Reconstruction of 43 miles of existing management fence is proposed to protect the burn area and minimize soil movement, preserve on-site productivity, reduce the invasion of undesirable flammable annual plants, and reduce the potential for noxious weeds. An addition (see map 7, ESR Plan)
- Fence line repair. It is estimated that 450 miles of existing interior fence to the fire were present. It is unknown at this time how many miles will need repair; however, due to the large amount of

previously unburned lands, most existing management fences were constructed with wood posts for corners, braces and gates (see Map 7, ESR Plan)

- Wildlife projects (water guzzlers) repair (see Map 3, ESR Plan)
- Rehabilitate impacts due to mechanical suppression actions, namely fire breaks created by heavy machinery (dozer lines).
- Signage repair (see Map 8, ESR Plan)
- Coordination with Oregon Department of Transportation to support replacement and new construction of snow/debris catch-fences along high-wind areas along US Hwy 95. Some sections of this proposal are outside of the existing right of way and are discussed under separate cover.
- Protecting culverts along Hwy 95 from debris accumulation and culvert/roadway damage.
- Reconstruction of snow fences along Hwy 95, and augmentation to capture blowing debris resulting from fire.
- Private property protection due to loss of vegetation and the resulting potential of increased peak flows.
- Soil stabilization at specific, currently unidentified locations to protect from increased potential for high run-off events.
- Noxious weed treatment (see Map 6, ESR Plan) of existing known or recently discovered species. Roadside treatments to minimize encroachment of cheatgrass, medusahead and
- Assessment and protection of cultural sites and related resources.

B. Land Use Plan (LUP) Conformance

LUP Name: *Southeastern Oregon Resource Management Plan* Date Approved: September, 2002

* List applicable LUPs (e.g., Resource Management Plans and activity, project, management, or program plans, or applicable amendments thereto)

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

Southeastern Oregon Resource Management Plan Rangeland Vegetation, pages 38-41; Wildlife and Wildlife Habitat Pages 50-51; Special Status Animal Species Pages 51-55; Rangeland/Grazing Use Pages 56-60; Off-Highway Vehicles Pages 65-67; Cultural Resources 106-107; and Adaptive Management Pages 111-113.

Southeastern Oregon Resource Management Plan Best Management Practices, Appendix O: Definition Page O-1, Fire Suppression Page O-6, Noxious Weed Management Page O-7.

Southeastern Oregon Resource Management Plan Best Management Practices and Rangeland projects and Improvements, Appendix S.

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

List by name and date all applicable NEPA documents that cover the proposed action.

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

Draft (1998), Final (2001), and Record of Decision (2002) Environmental Impact Statement prepared for the SEORMP

Vale District Integrated Weed Control Plan EA (1989)

Northwest Area Noxious Weed Control Program EIS (1987)

BLM Manual 6330—Management of BLM Wilderness Study Areas (2012)

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

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

Greater Sage-Grouse Interim Management Policies and Procedures (BLM WO IM 2012-043, December, 2011)

US Fish and Wildlife Service *12-Month Findings for Petitions to List Greater Sage-Grouse as Threatened or Endangered* (2010 (75 Fed. Reg.13910))

BLM *National Greater Sage-Grouse Planning Strategy* (BLM WO, August 2011)

BLM *Report on National Greater Sage-Grouse Conservation Measures* (BLM National Technical Team on Greater Sage-Grouse, December, 2011)

Oregon Department of Fish and Wildlife. *Greater Sage-Grouse Conservation Strategy Assessment and Strategy for Oregon*. (Salem, 2005)

Oregon Department of fish and Wildlife, 2011. *Greater Sage-Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat* (April, 2011)

Knick and Connelly, *Ecology and Conservation of Greater Sage-Grouse: a Landscape Species and its Habitats* (Monograph, 2011)

The Interim Management Policy (IMP) and Guidelines for Lands under Wilderness Review (BLM Manual H-8550-1)

SEORMP Settlement Agreement (Case 05-35931, June 10, 2010) between Vale District BLM and Oregon Natural Desert Association (ONDA) resulting from Ninth Circuit Court of Appeals decision (*ONDA v. BLM*, 625 F.3d 1092 (9th Cir. 2010)).

Heady and Bartolome, *The Vale Rangeland Rehabilitation Program: the Desert Repaired in Southeastern Oregon (Vale Project)*, USDA Forest Service Resource Bulletin PNW-70, 1977.

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

D. NEPA Adequacy Criteria

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

Documentation of answer and explanation:

Temporary Fencing

Restoring burned areas from livestock grazing is policy set forth in the ROD (Page 40), which encompasses the area burned by the Long Draw fire.

The proposed action is specifically a feature of the NFESRP, both in terms of closing areas to livestock grazing until vegetation has re-established, and regarding construction of temporary fencing (Page 46). The NFESRP states, “Temporary fencing would allow areas within a pasture that are not burned to remain available for livestock grazing, reducing economic impacts to permittees, where fencing is feasible.”

Temporary fence location and layout were engineered by Vale BLM resource specialists and conform to Standard Implementation Features and Procedures (ROD, Appendix S)

Seedings

Identification of target ground-based seeding areas (see Maps 4 and 5, ESR Plan) in the burned area was based on ecological conditions, site potential, elevation, seed availability, and the threat of invasion of existing competitive non-desirable vegetation species (cheatgrass). Seed mixes and treatment method for seeding units were selected through interdisciplinary team analysis to maximize seed germination. The actions reflect the SEORMP objectives for Rangeland Vegetation and Wildlife and Wildlife Habitat, and have been analyzed through the SEORMP FEIS and incorporated into the NFESRP.

Objectives set out in the SEORMP for Rangeland Vegetation (ROD at Pages 38-41) are to (a) Restore, protect and enhance the diversity and distribution of desirable vegetation communities including perennial native and desirable introduced plant species”; (b) Manage big sagebrush cover in seedings and on native rangeland to meet the life history requirements of sagebrush-dependent wildlife; and (c) Control the introduction and proliferation of noxious weed species and reduce the extent and density of established weed species to within acceptable limits.

Objectives set out and analyzed through the SEORMP FEIS for Wildlife and Wildlife Habitat (ROD at Page 51): “Manage upland habitats in forest, woodland and rangeland vegetation types so that the forage, water, cover, structure and security necessary for wildlife are available on public land”

The SEORMP FEIS specifically recognized and analyzed the influence of abundance, structure and spatial arrangement of sagebrush communities (ROD, Appendix F-5). Sagebrush seedings were identified based on site potential, the location of historic and recently active sagebrush dependent wildlife species, including Greater Sage-Grouse.

The current proposed actions are identified in the Vale District NFESRP (Natural recovery, pg 6; Drill Seeding & planting, pg. 7-9; Weed control, pg. 9; Protective fence, pg. 11; Design features, pg.13&14) and are substantially the same actions as analyzed in that document.

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?

Documentation of answer and explanation: The NFESRP and SEORMP analyzed a range of alternatives including no action with respect to current concerns, interests and resource values.

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

Documentation of answer and explanation: There is no significant new information or circumstances that would warrant additional analysis. The SEORMP FEIS anticipated the impact of fire on public land resources and resource values, considered a range of alternatives to address post-fire management, and analyzed the alternative consequences different potential management actions to respond to wildland fire impacts. The NFESRP Environmental Assessment comprehensively analyzed all proposed actions considered within the ESR plan.

Additionally, the following factors were specifically considered under BLM's *Greater Sage-Grouse Interim management Policies and Procedures* (IM 2012-043), and are reflected in proposed treatments in the ESR Plan:

- Integrated Vegetation Management:
 - Proposed treatments were specifically analyzed in terms of fine (pasture level) and mid-scale (Geographic Management Areas (GMA), see Map 2, Revised ESR Plan) levels of Ecosystem Based Management (FEIS, Pages 141-142) required to “address habitat fragmentation, effective patch size, invasive species presence, and protection of intact sagebrush communities”.
 - Proposed seedings and plantings were selected using preliminary Ecological Site Inventory and Descriptions data where available (Vale BLM and NRCS, unpublished).
 - Design treatments to: promote sagebrush communities; limit the expansion of invasive species; maintain or improve soil site stability, and hydrologic function and biological integrity.
- Wildfire Emergency Stabilization and Burned Area Rehabilitation:
 - Prioritize re-vegetation projects to: maintain and enhance intact sagebrush habitat.

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

Greater Sage-Grouse Management

In March, 2010 the U.S. Fish and Wildlife Service issued its finding that Greater Sage-Grouse are “warranted but precluded” for listing under the ESA (Notice, 75 FR 13910 – 14014; 03/23/2010). Thirty-eight scientists from federal, state and nongovernmental organizations collaborated to synthesize the information and findings on Greater Sage-Grouse, and compiled in *Ecology and Conservation of Greater*

Sage-Grouse: a Landscape Species and its Habitats (Monograph, 2011). Following this, in December, 2011, the BLM issued Instruction Memorandum No. 2012-043 which provides interim management policies and procedures for Greater Sage-Grouse. Also released in December, 2011 was the BLM's *A Report on National Greater Sage-Grouse Conservation Measures* developed by the BLM's National Technical Team on Greater Sage-Grouse (NTT Report). Separately, the Oregon Department of Fish and Wildlife (ODFW) published the *Greater Sage-Grouse Conservation Assessment and Strategy for Oregon: A Plan to Maintain and Enhance Populations and Habitat* (ODFW Strategy, April, 2011). These documents provide the most current information on Sage-Grouse populations and habitat requirements and were reviewed for consistency with proposed actions within the Long Draw fire.

Information contained in the above research and policy clearly identifies fire as a significant factor in the loss of Greater Sage-Grouse habitat. The documents vary in their recommendations for post-fire response, but are consistent in recommendations to temporarily resting burned areas from intensive use by off-highway vehicles and livestock grazing. The new literature cited above variously describes the effectiveness of seeding following fire, but emphasize the use of native seed where possible. Consistent in the literature is the slow natural expansion of sage brush species from remaining internal, unburned islands, or from sage brush communities at the edge of the burn. Sage brush seeding and plantings are encouraged where site potential suggests success (IM 2012-043, Integrated Vegetation Management).

Ground-based seeding and planting treatments proposed in the ESR Plan are consistent with recommendations in recent literature and agency conservation strategies to minimize the potential encroachment of invasive species (ODFW Strategy, Pages 107-108). Temporary impacts from mechanical seed applications are benign, given the loss of sage brush communities due to the burn, have the greatest potential to preclude invasion of adjacent non-native invasive grasses and noxious weeds, and hold the highest probability for success in expediting the restoration of sage brush dependent species.

Native and non-native seed species, along with sagebrush proposed in the ESR Plan are consistent with BLM Interim Management (IM 2012-043, Integrated Vegetation Management and Wildfire Emergency Stabilization and Burned Area Rehabilitation) and ODFW's Conservation Strategy (Wildfire, Pages 99-101; Vegetation Treatments Pages 109-110)

Proposed treatment design features identified in the NFESRP and incorporated into the ESR Plan and ESR Implementation Plan specify: avoiding remaining unburned sage brush islands; selecting mechanical equipment seeding routes which vary with the topography to encourage a mosaic vegetation structure as the area re-establishes; and encourages diverse distribution of re-vegetation to meet habitat needs of the greatest number sagebrush obligates as possible. These features are included in the ESR Plan and are consistent with post-fire rehabilitation identified in the Interim Management for Sage-Grouse (IM 2012-043) and the ODFW Strategy.

Proposed projects for the Long Draw ESR were considered and designed to conform to the Interim Management and Conservation measures set forth in the NTT Report. A priority for the proposed ESR projects is stabilization and rehabilitation of existing, known Greater Sage-Grouse habitat, particularly Sage-Grouse Habitat identified as Preliminary Priority Habitat (PPH, NTT Report). ODFW's identification of Core Habitat was adopted by BLM as PPH for analytical purposes and are identical geographic areas. Due to the acreage of Sage-Grouse habitat impacted by the fires (see ESR Maps 5 and 9), BLM focused sage brush seeding ESR actions on burned areas in PPH and near known Sage-Grouse leks. Design features and methodologies were specifically incorporated into all proposed projects which would facilitate rehabilitation of Sage-Grouse habitat requirements of nesting, escape, foraging and other seasonal cover and vegetation. Proposed projects conform to IM No. 2012-043. BLM has concluded that these projects provide the best methods to stabilize the treatment units, minimize encroachment by

invasive plant species and effectively rehabilitate Sage-Grouse habitat, and that those actions would not substantially change through additional analysis.

The new information and new circumstances would not substantially change the analysis in the NFESRP on the new proposed action.

Lands found to have wilderness characteristics

The second issue arising since completion of the NFESRP was the finalization of a Settlement Agreement between the BLM and ONDA in response to a decision of the Ninth Circuit Court of Appeals, *ONDA v. BLM*, 625 F.3d 1092 (9th Cir. 2010), which upheld ONDA's challenge to the SEORMP. In part, the Settlement Agreement identified a need to update the BLM's inventory of wilderness characteristics resources within the SEO planning area, but outside of existing WSAs and designated Wilderness. This inventory has been completed. The Settlement Agreement also required the BLM to analyze the effects of any proposed projects on the identified wilderness characteristics through "NEPA processes". Amendment of the SEORMP began with public scoping in May, 2010, but that process has been delayed due to BLM's national planning effort in response to US Fish and Wildlife Services *warranted but precluded* listing of Greater Sage-Grouse. Vale BLM will continue working on the Settlement Agreement as decisions and public input on Sage-Grouse planning is developed.

Vale BLM's agreement to analyze alternatives for management of lands with wilderness characteristics under NEPA has thus, not been completed. However, several indicators of the effect of ESR treatments on wilderness characteristic values were considered through interdisciplinary team analysis:

- The original wilderness inventory on all public lands in Oregon was completed in the between 1977 and 1989 (BLM *Oregon Wilderness Environmental Impact Statement, December, 1989*). The result of this inventory was the designation of approximately 1.3 million acres of Wilderness Study Areas within the SEORMP planning area. Those lands are managed under IMP.
- Many lands found to not possess wilderness characteristics in the original inventory were found as such due to extensive mechanical treatments and range project developments that were implemented in the decade preceding the original inventory (Vale Project). In particular the Vale Project provided Congressional-level funding to complete extensive landscape-level rangeland drill mechanical vegetation treatments. A component of wilderness characteristics inventory is how "natural" an area is to the casual observer; at the time of the original inventory, the recent Vale Project drill seedings were dominant in much of the landscape and led to findings that extensive areas were non-natural.
- Between 2007 and 2012, as required by the Settlement Agreement, Vale BLM has completed wilderness characteristics inventories of all lands affected by the fire. BLM conducted extensive field and interdisciplinary reviews of these lands and have published final findings.
- Many areas in the previous inventory, and treated under the Vale Project effort have now been found to possess wilderness characteristics. The seeding techniques proposed treatments in lands with wilderness character will have less of an impact on "naturalness" that the seeding techniques used in the Vale Project days and will allow the treated area to maintain wilderness characteristics.
- Interim management of Wilderness Study Areas provides clear direction that permits limited rehabilitation efforts, so long as no action negatively impacts wilderness values. While WSAs and lands found to possess wilderness characteristics are managed under separate authorities, the resources inventoried are identical. The seeding techniques proposed on lands with wilderness characteristics are identical to the emergency stabilization seeding techniques used by the Vale District on WSA's.

Vale BLM management of public lands since the Wilderness Inventory and release of the *Wilderness Study Report* has led to conditions that have resulted in findings that certain additional areas now possess wilderness characteristics. Within the burned area, approximately 206,000 acres have been determined to possess wilderness characteristics (see Map 8, ESR Plan). While this does not suggest that these lands warrant wilderness designation (suitability recommendations for Wilderness designation of Wilderness Study Areas are provided in *BLM Wilderness Study Report, October, 1991*), under the stipulations of the Settlement Agreement, any proposed actions will not be implemented which would cause either the ONDA recommendations or the Vale BLM wilderness characteristic units to not meet the minimum wilderness character criteria.

Treatments proposed in lands determined to have wilderness character were selected to maintain, protect and/or enhance values identified by BLM through the wilderness characteristics inventory. Proposed actions in lands found by BLM to have wilderness characteristics are consistent with actions addressed in the NFESRP that occur in Wilderness Study Areas. All proposed actions are designed to have only short-term, if any, impact to wilderness characteristics. Proposed treatments were also designed to: minimize the risk of invasion of cheatgrass or noxious weeds; incorporate seed mixes, including native species, to enhance the natural character of the area; and utilize methodologies that minimize the short term visual and aesthetic impacts to the area. The proposed actions will not have a permanent impact to either the size of the inventoried wilderness characteristics unit or the individual wilderness characteristics.

The BLM concludes that the proposed ESR actions will not have substantial or long term impacts on the wilderness characteristics and would not affect either the existing finding that a unit contains wilderness characteristics, diminish the size of the unit, or affect the eventual management direction made at the conclusion of the agreed-to RMP Amendment process to address lands with wilderness characteristics, and thus would not benefit from additional analysis.

The new information and new circumstances would not substantially change the analysis in the NFESRP on the new proposed action.

Extent of the burned area

The last issue that was not expressly identified in the NFESRP is the large size of the burned area. The Long Draw fire burned over 550,000 acres. Prior to the year the NFESRP was signed (2005), the largest recorded fire (1980-2006) was 80,000 acres (Jackson Fire in 2000). In 2005, approximately 1.3 million acres had burned between 1980-2006, with a yearly average of 53,400 acres burned. Actions analyzed in the NFESRP were the normal emergency stabilization and rehabilitation actions Vale BLM would consider following any wildland fire, given typical post fire conditions. Protecting life and property, safety considerations, ground and aerial seedings, plantings, temporary fencing, resting burned areas from livestock grazing, facility reconstruction, among other actions are a part of the set of actions Vale BLM considers, regardless of the location or size of a given fire. The size of the Long Draw fire does require BLM to evaluate options for ESR projects across a broader landscape. Funding and implementation limitations (e.g., seed availability, staffing, machinery and equipment) may cause some proposed actions to be reduced from what was proposed in the ESR Plan. Additional funding and other resources which become available will be implemented, if possible, within the actions considered in the ESR Plan. If additional resources become available beyond what is identified in the ESR Plan, additional NEPA review may become necessary. However, the types of emergency stabilization treatments, the post fire conditions, and time frame for completing said actions are typical and were assessed in the NFESRP and the number of acres burned and number of acres to be treated would not substantially change the analysis in the NFESRP on the new proposed action.

The new information and new circumstances would not substantially change the analysis in the NFESRP on the new proposed action.

Summary

All proposed actions in this plan are beneficial to the recovery of the burned area and are determined to be necessary to restore the burned area as efficiently as possible to meet resource objectives. More importantly, none of the new information requires the preparation of supplemental NEPA and would not change the analysis in the existing NEPA.

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

Documentation of answer and explanation: The methodology and analytical approach used in the NFESRP would continue to be appropriate for the proposed action.

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

Documentation of answer and explanation: Direct and indirect impacts of the proposed action are substantially the same as those analyzed in the proposed action, pages 37-46 of the NFESRP and SEORMP. Southeastern Oregon Resource Management Plan Rangeland Vegetation, pages 38-41; Wildlife and Wildlife Habitat Pages 50-51; Special Status Animal Species Pages 51-55; Rangeland/Grazing Use Pages 56-60; Off-Highway Vehicles Pages 65-67; Cultural Resources 106-107; and Adaptive Management Pages 111-113.

Southeastern Oregon Resource Management Plan Best Management Practices, Appendix O: Definition Page O-1, Fire Suppression Page O-6, Noxious Weed Management Page O-7.

Southeastern Oregon Resource Management Plan Best Management Practices and Rangeland projects and Improvements, Appendix S.

SEORMP FEIS; Fire Management, pages 405-411; Rangeland Vegetation, 411-434; Wildlife and Wildlife Habitat, 495-514; Rangeland/Grazing Use, 559-574.

Cumulative impacts of the proposed action are substantially the same as those analyzed in the NFESRP on page 47 and SEORMP.

SEORMP FEIS; Fire Management, pages 405-411; Rangeland Vegetation, 411-434; Wildlife and Wildlife Habitat, 495-514; Rangeland/Grazing Use, 559-574.

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

Documentation of answer and explanation: The NFESRP and SEORMP were analysis documents reviewed by a diverse representation of publics, including federal, state and local agencies as well as private entities. The notice of availability of the Environmental Analysis and opportunity to comment on

the NFESRP was sent to over 400 individuals, organizations, agencies, local governments, state governments, and federal governments.

E. Interdisciplinary Analysis:

The following team members conducting or participating in the preparation of this worksheet.

Brent Grasty	NEPA Compliance and Planning
Linus Meyers	NRS – Soil/Air/Water
Don Rotell	Supervisory NRS/Archeologist
Brian Watts	Fire and Fuels Management
Lynne Silva	Weeds Specialist
Josh Travers	Recreation Management Specialist
Garth Ross	Wildlife Biologist
Bill Lutjens	Rangeland Management Specialist
Susan Fritts	Botanist
Pat Ryan	Field Manager

F. Conclusion

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



Signature of the Responsible Official

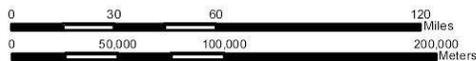
10/30/2012
Date

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.



Legend

- Long Draw Fire
- Vale District
- State of Oregon



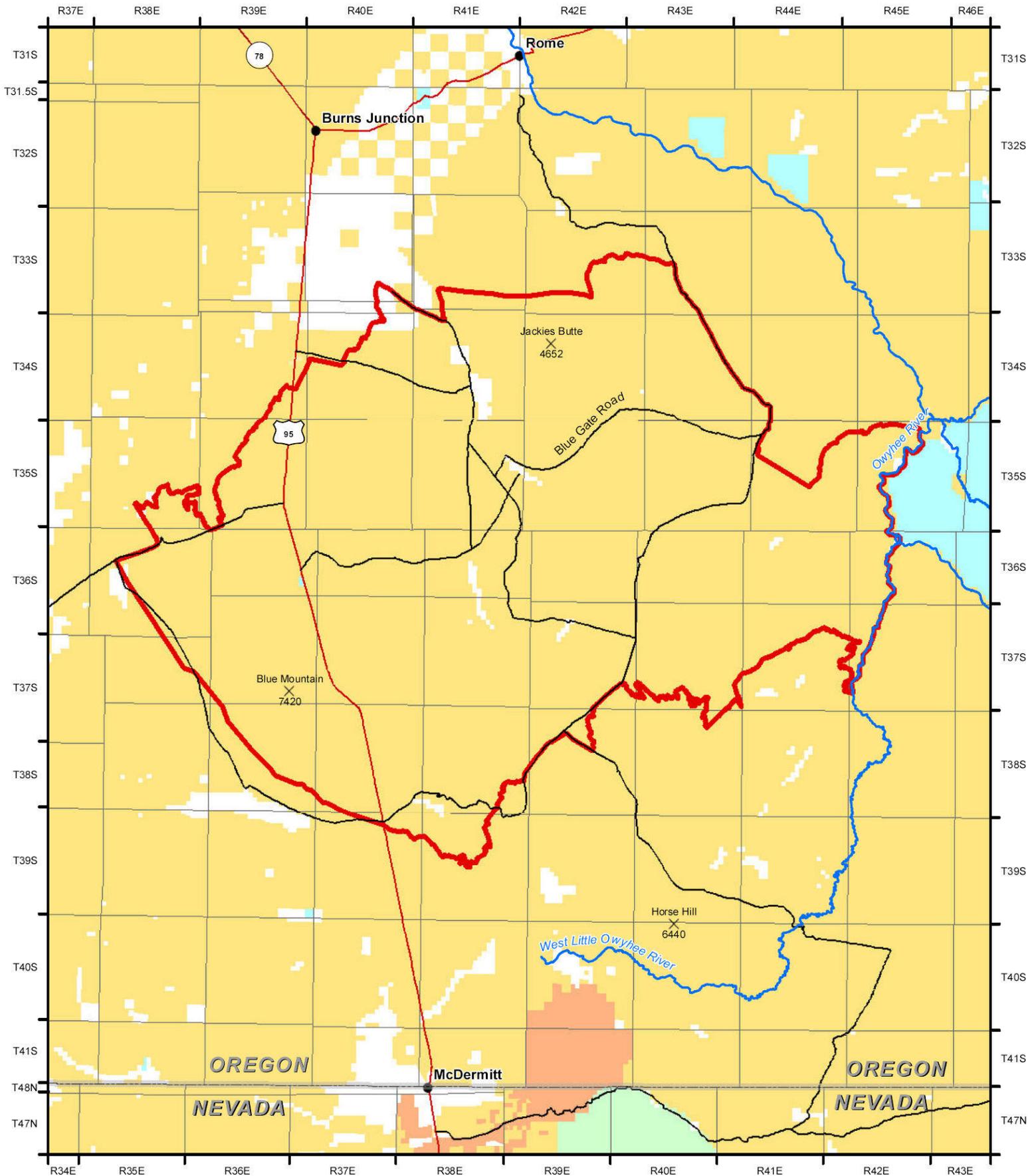
Map 1
Long Draw Fire Location
Long Draw Fire - Emergency Stabilization & Rehabilitation

U.S. Department of Interior
 Bureau of Land Management

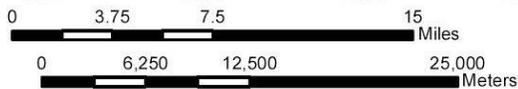


Vale District
 August 5, 2012

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- Legend**
- Long Draw Fire Perimeter
 - Primary Routes
 - State Boundary
 - BLM - 550,200 Acres
 - Other Federal Lands
 - Bureau of Indian Affairs
 - U.S. Forest Service
 - Private - 7,750 Acres
 - State Lands - 220 Acres



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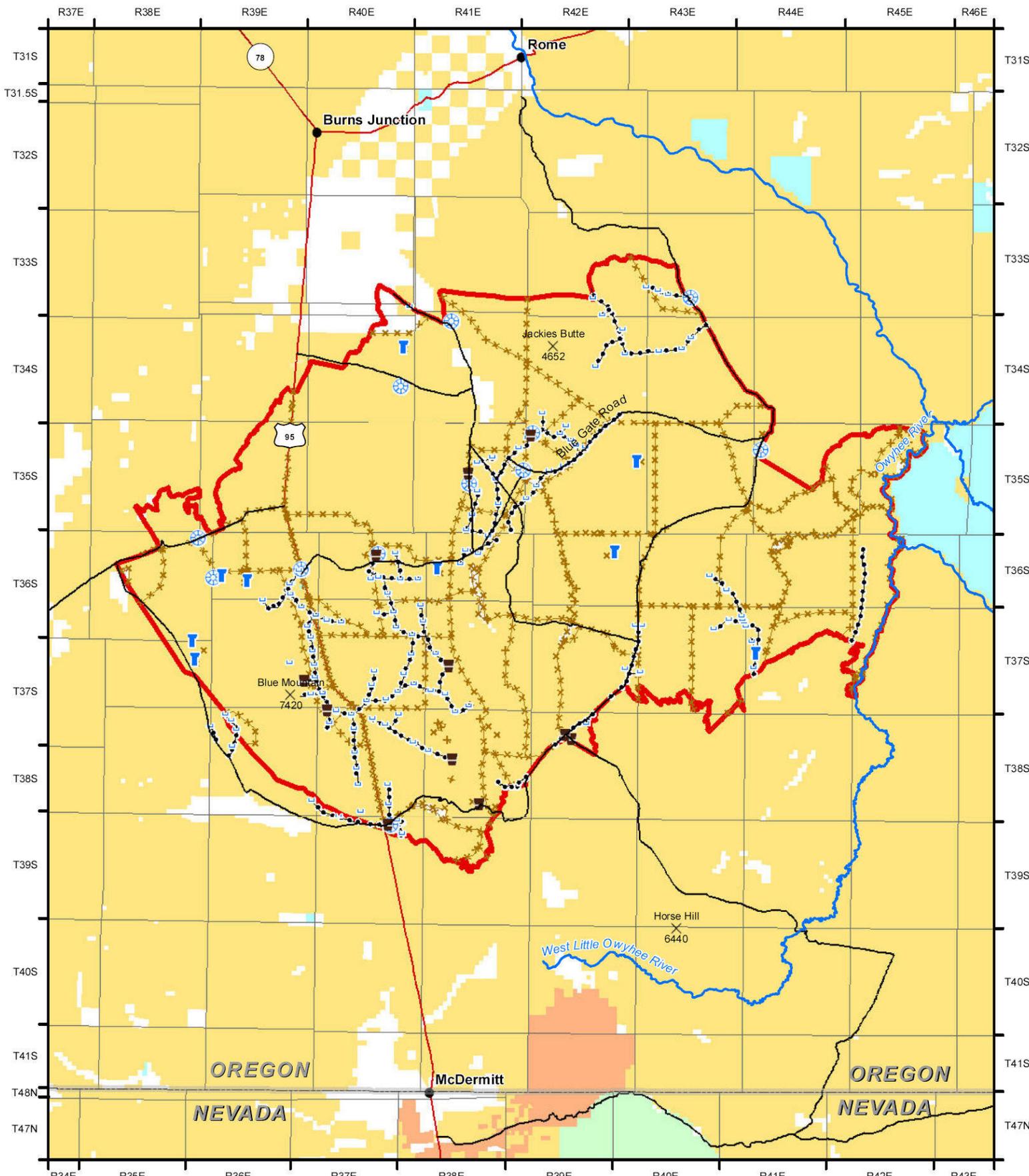


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Map 2 Ownership

Long Draw Fire - Emergency Stabilization & Rehabilitation



- Legend**
- Long Draw Fire Perimeter
 - Information and Directional Signs
 - Wells
 - Troughs
 - Pipelines
 - Wildlife Guzzlers
 - Interior Fencelines

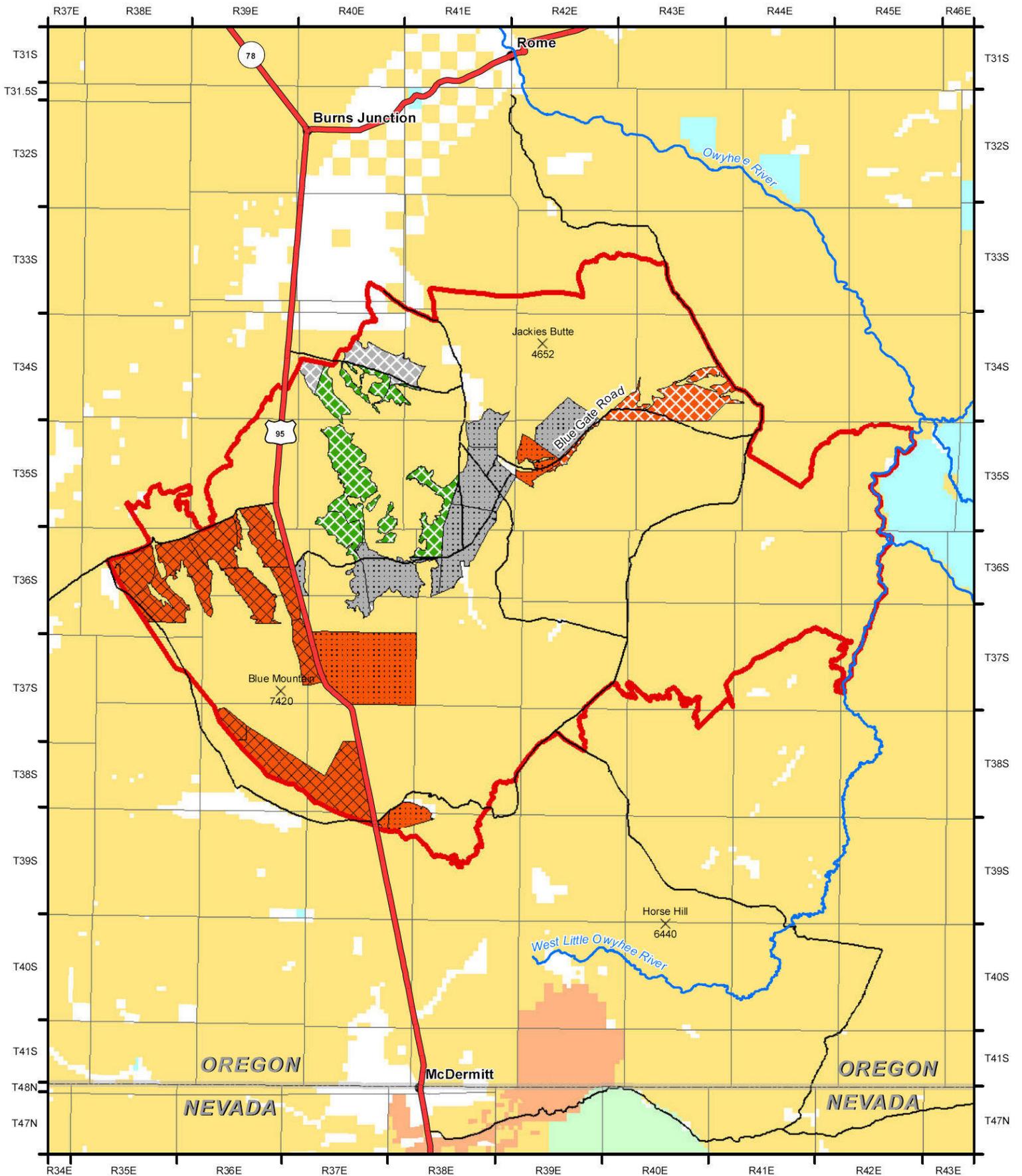


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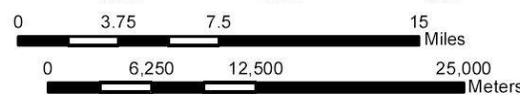
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Map 3
Repair of Minor Facilities
Long Draw Fire - Emergency Stabilization & Rehabilitation



- Legend
- Long Draw Fire Perimeter
 - Seeding Method**
 - Aerial Seed and Chain
 - Drill
 - Drill - Modified
 - Ground Based Application Seed Mix**
 - Non-native Species
 - Mixed Native & Non-Native
 - Native Species

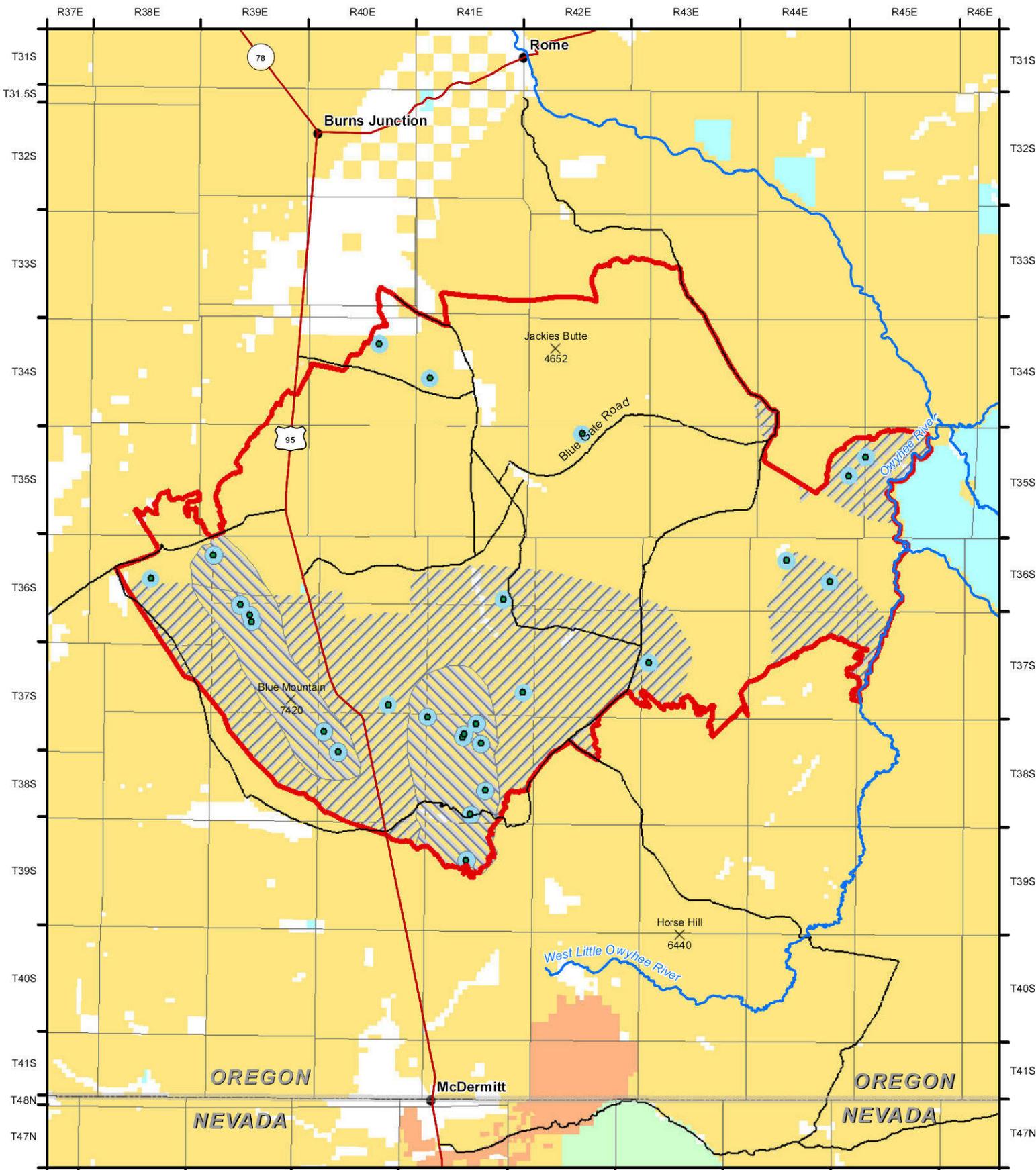


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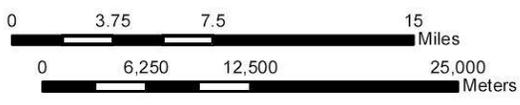
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Map 4
Herbaceous Seed Mix and Treatment Method
Long Draw Fire - Emergency Stabilization & Rehabilitation

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- Legend**
- Long Draw Fire Perimeter
 - Recorded Sage-grouse Lek Locations
 - Planting
 - Aerial and/or Scatter Seed
 - Collect and Scatter Seed



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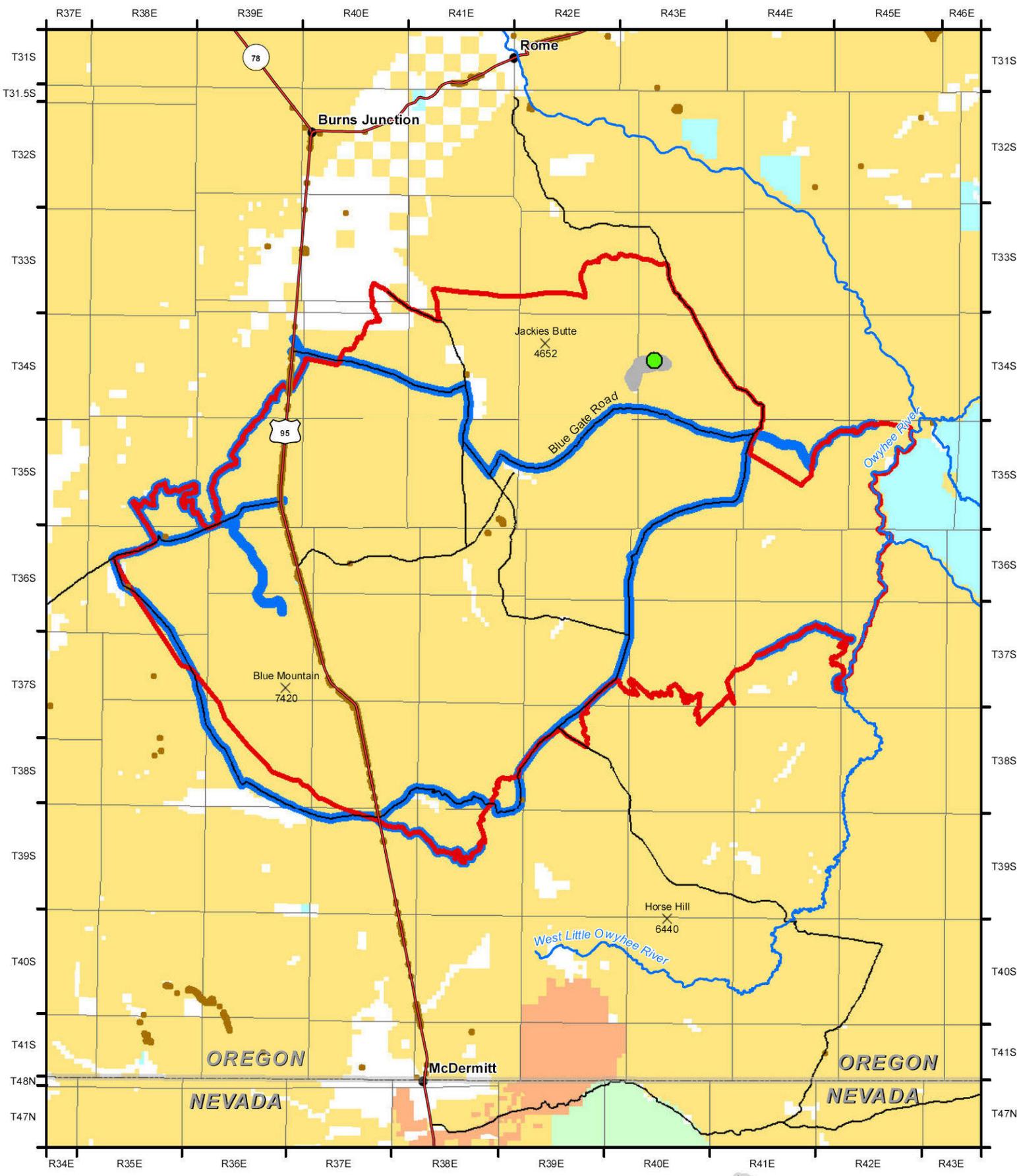



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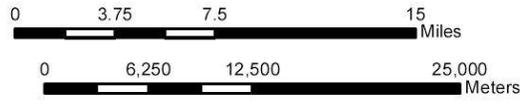
Note: All public lands outside of priority sage brush treatments shown above will be aerial seeded as funding and seed are available.

Map 5
Proposed Sage Brush Seed Application and Planting
Long Draw Fire - Emergency Stabilization & Rehabilitation

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- Legend**
- ▬ Long Draw Fire Perimeter
 - Rush Skeletonweed
 - Scotch thistle
 - Noxious and Invasive Weeds
 - ▬ Imazapic Treatments

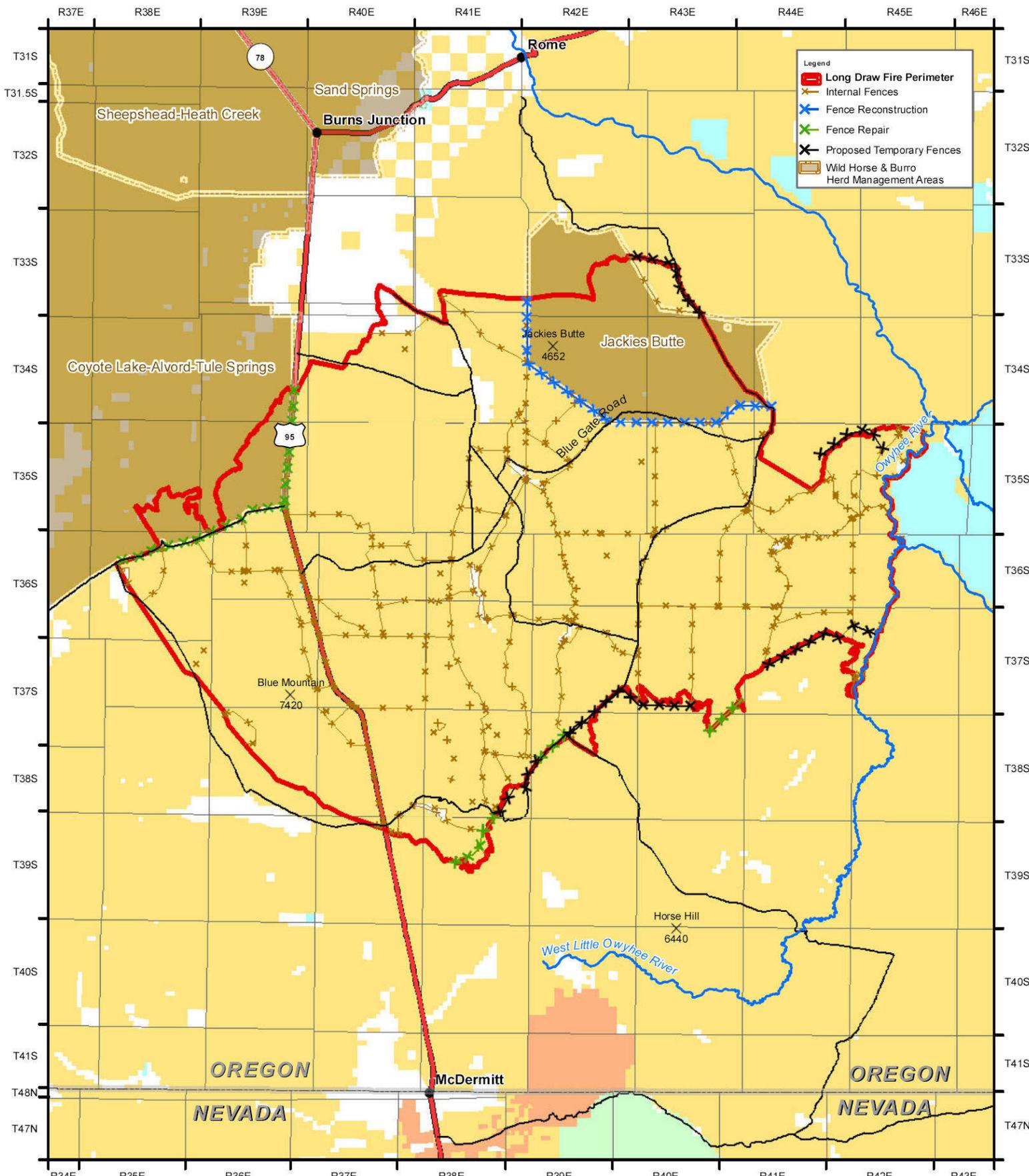


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Map 6
Recorded Noxious Weed Locations and Proposed Herbicide Applications
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Legend

- Long Draw Fire Perimeter
- Internal Fences
- Fence Reconstruction
- Fence Repair
- Proposed Temporary Fences
- Wild Horse & Burro Herd Management Areas

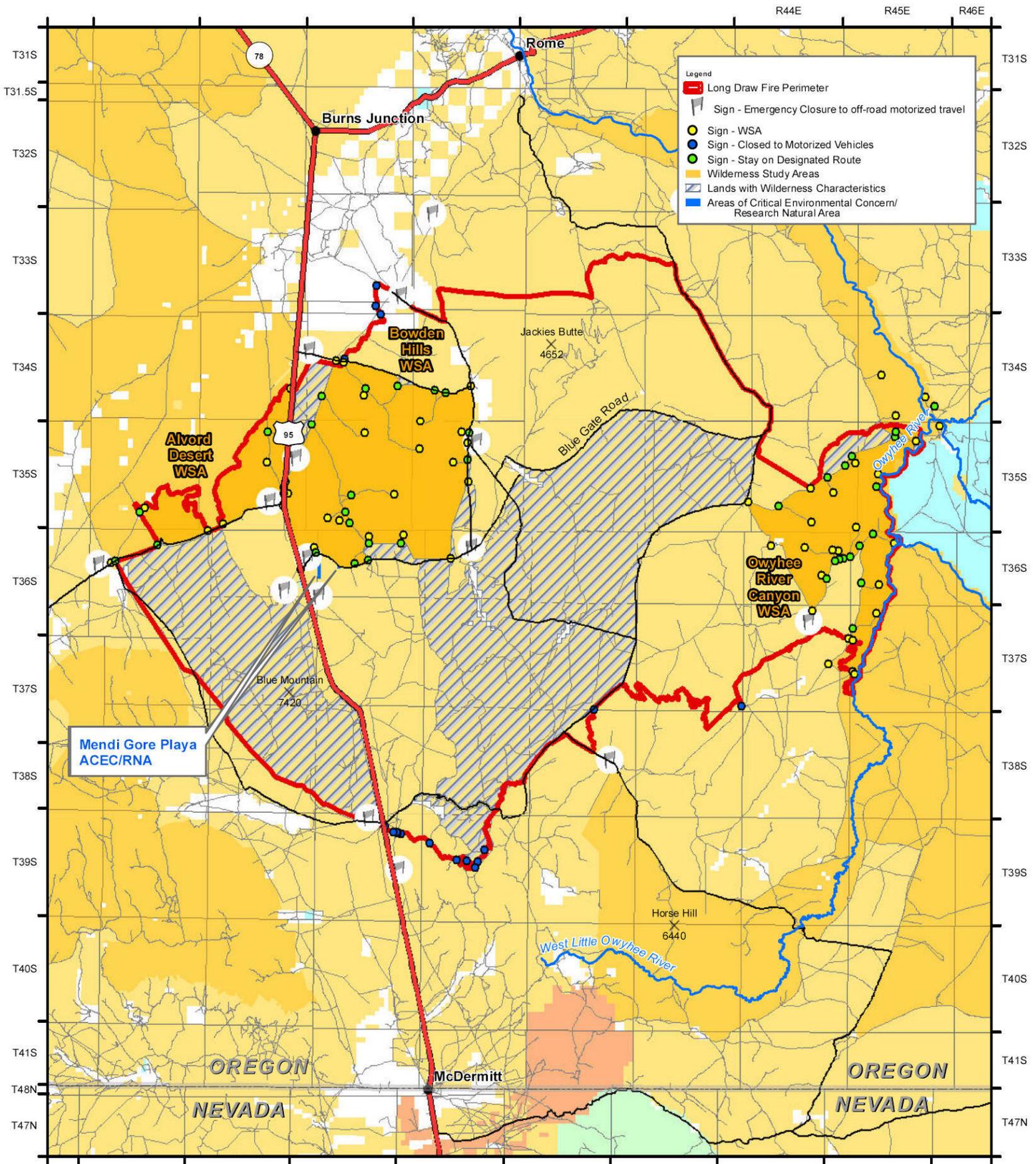


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Map 7
Protective Temporary Fences/Related Facilities Repair
Long Draw Fire - Emergency Stabilization & Rehabilitation

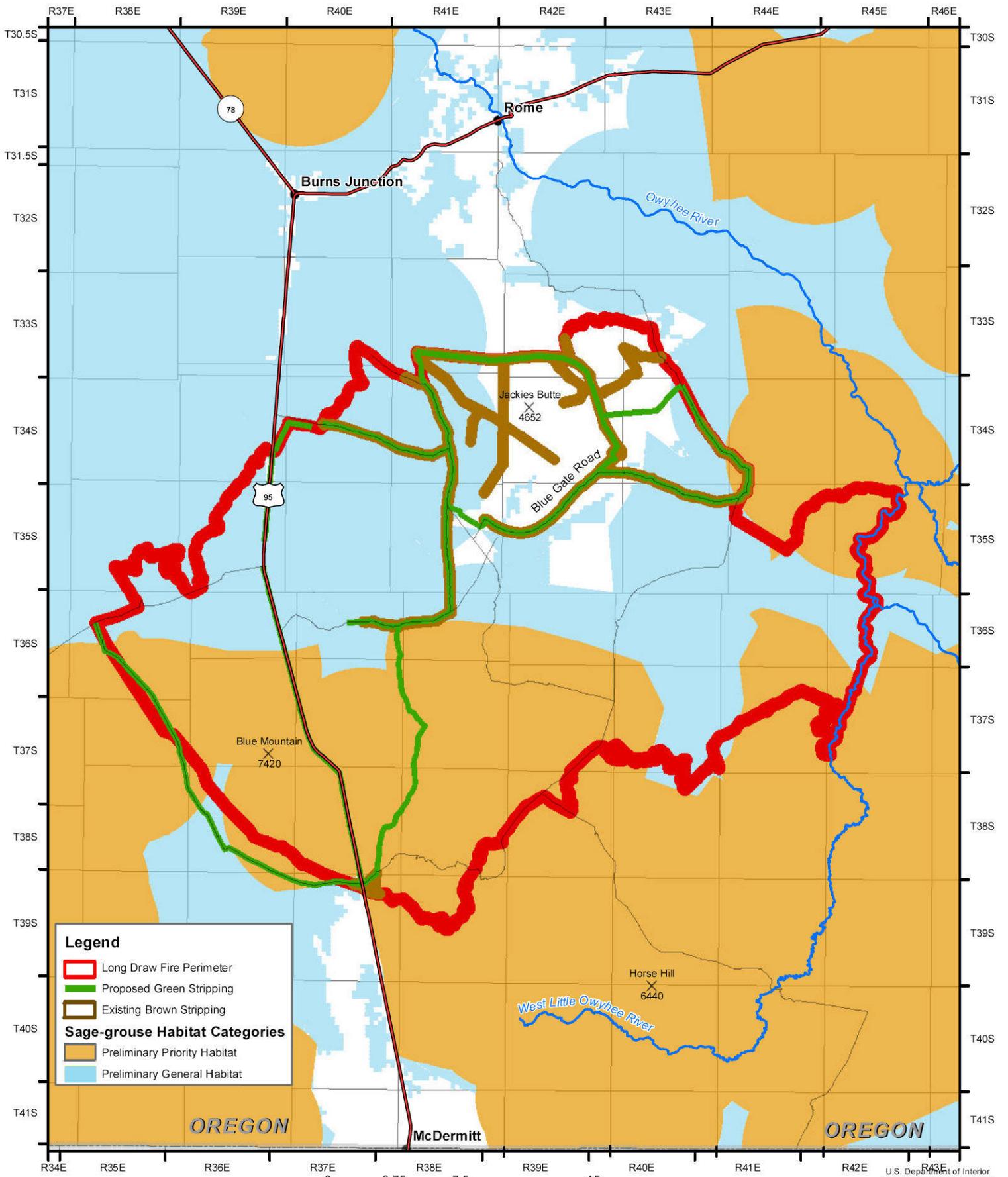
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**Map 8 - WSAs, ACECs, Lands with Wilderness Character and Sign Replacement
Long Draw Fire - Emergency Stabilization & Rehabilitation**

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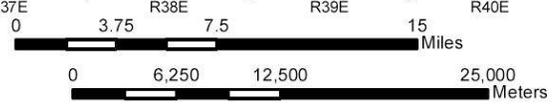


Legend

- ▭ Long Draw Fire Perimeter
- ▭ Proposed Green Stripping
- ▭ Existing Brown Stripping

Sage-grouse Habitat Categories

- ▭ Preliminary Priority Habitat
- ▭ Preliminary General Habitat



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**Map 9 - Sage Grouse Habitat and Protection Actions
Long Draw Fire - Emergency Stabilization & Rehabilitation**