



# United States Department of the Interior



## BUREAU OF LAND MANAGEMENT

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2822 (CA-170.2) P  
CA-170-07-ESP-002

### **DECISION RECORD, ENVIRONMENTAL ASSESSMENT(09/05/07), AND FINDING OF NO SIGNIFICANT IMPACT FOR THE INYO COMPLEX FIRE EMERGENCY STABILIZATION & BURNED AREA REHABILITATION PLANS (EA #170-07-053)**

I have reviewed the attached environmental assessment including the explanation and resolution of any potentially significant environmental impacts. The BLM Bishop Field Office interdisciplinary review and analysis has determined that the proposed action would not have any significant impacts on the human environment and that an EIS is not required. This finding is based on the significance criteria, as defined by the Council on Environmental Quality (Title 40 CFR 1508.7)

The proposed action is limited in geographic context and is necessary to reduce destruction of cultural resources, invasion of non-native plant species, etc. These actions meet the need for emergency stabilization, long term rehabilitation of the area's natural values, and long term landscape habitat integrity. I am implementing this decision under the **Full Force and Effect Authority** delegated to BLM under 43 CFR 4190 and 43 CFR 5003.1 because the immediate threat of invasive plant species, damage to cultural resources and wildlife habitat warrants prompt action.

The project will have the following benefits:

- Assist with native plant reestablishment, reducing native weed infestations to the extent practicable.
- Reduce impacts to newly exposed cultural resources sites.
- Assist with reestablishment of forage for mule deer habitat.
- Reduce cross-country vehicle use.

I have determined that the proposed project is in conformance with the Bishop Resource Management Plan, which was approved March 25, 1993. This plan has been reviewed, and the proposed action conforms with the land use plan terms and conditions as required by 43 CFR 1610.5.

It is my decision to implement the project as described in the Inyo Complex Fire Emergency Stabilization Plan and Burned Area Rehabilitation Plan Environmental Assessment. Since the Plans were proposed by BLM, design standards to produce the most efficient plan possible were included, thus no mitigation measures are required.

Authorized Official: /s/ Bill Dunkelberger  
Field Office Manager

Date: September 5, 2007\_\_\_\_\_

**Environmental Assessment (CA-170-07-053) for  
Inyo Complex Emergency Stabilization and Burned Area Rehabilitation Plan  
US Department of the Interior  
Bureau of Land Management  
Bishop Field Office  
Inyo County, California**

**I. Purpose, Need, and Location for the Action:**

The proposed action's purpose is to return public lands burned in a recent wildfire to its natural vegetative character and habitat integrity. The proposal comprises several field measures applying emergency stabilization and burned area rehabilitation treatments to public lands located in the eastern Sierra of California. The Inyo Complex Emergency Stabilization Plan (ESP) and The Burned Area Rehabilitation Plan (BAR), completed in summer of 2007, identify the prescribed treatments. Both plans contain equivalent measures and are mirror images of each other. Copies of the plan are located in respective case files in the BLM Bishop Field Office.

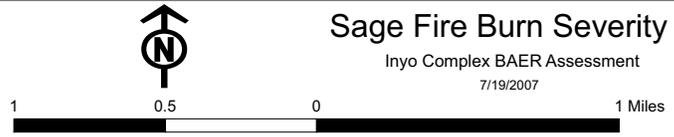
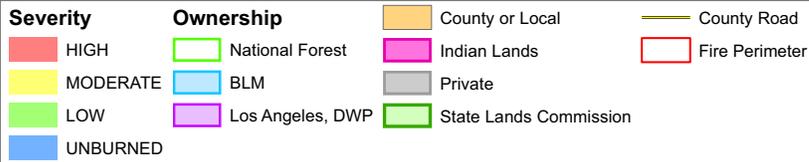
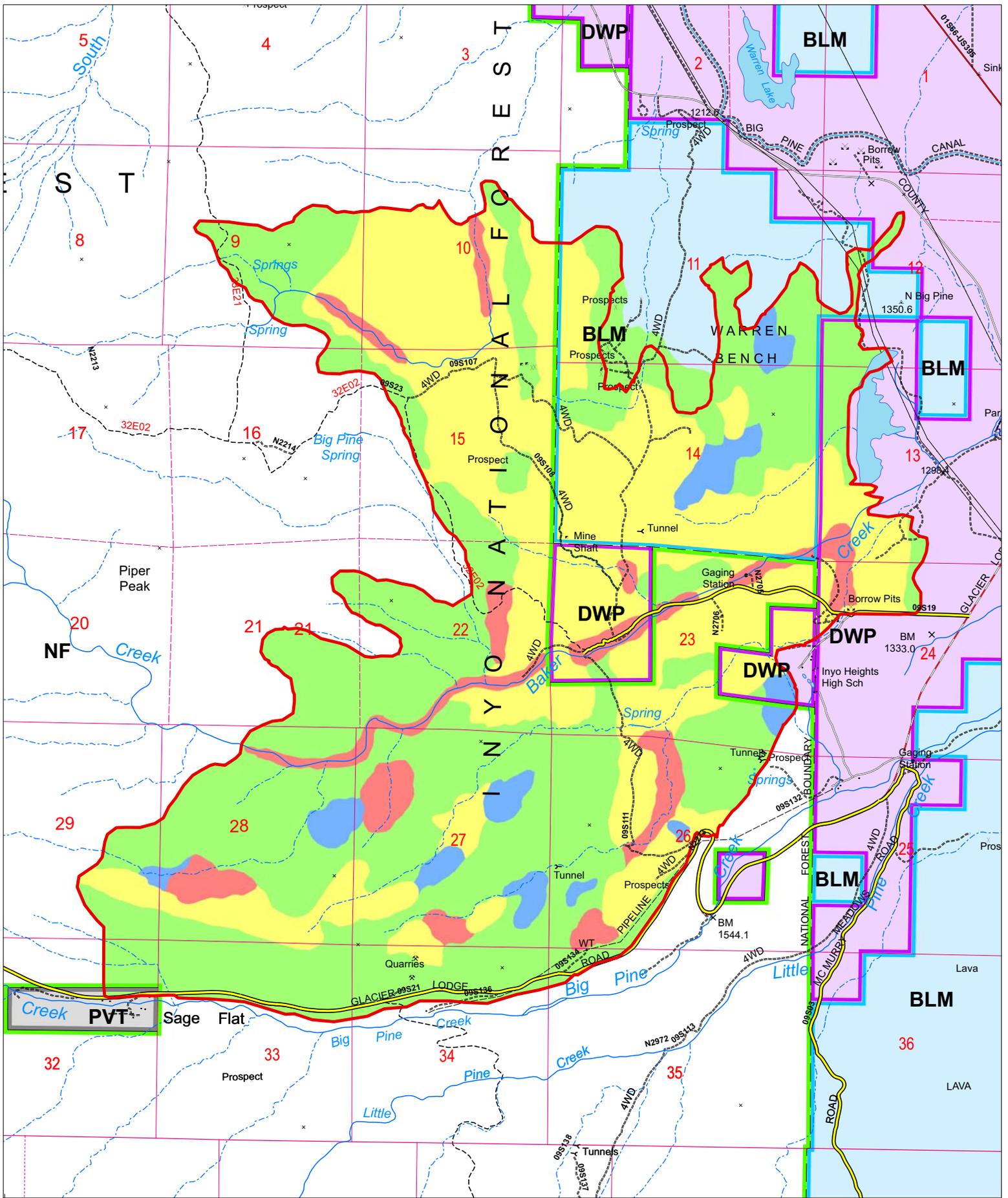
The Inyo Complex Wildfire of 2007 burned 35,153 acres of Inyo National Forest, BLM, and private land. BLM administers approximately 6,700 acres of burned BLM land. The fire burned two separate areas that did not overlap, creating two distinct burn areas. One fire burned 5,640 acres (Seven Oaks Fire) while the other fire (Sage Fire) burned 1,056 acres of public land. The wildfire created burn impacts that require emergency stabilization and rehabilitation actions for the next three years. The emergency stabilization and rehabilitation measures would reduce soil erosion; prevent off-highway vehicle incursions in the burn area; monitor and protect newly exposed cultural sites; monitor and prevent weed infestation; and facilitate regeneration of endemic plant species burned in the fire.

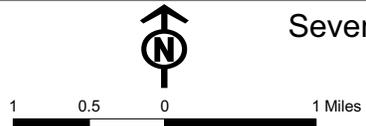
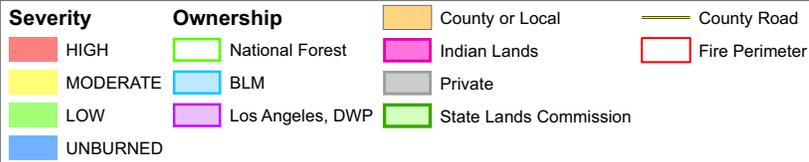
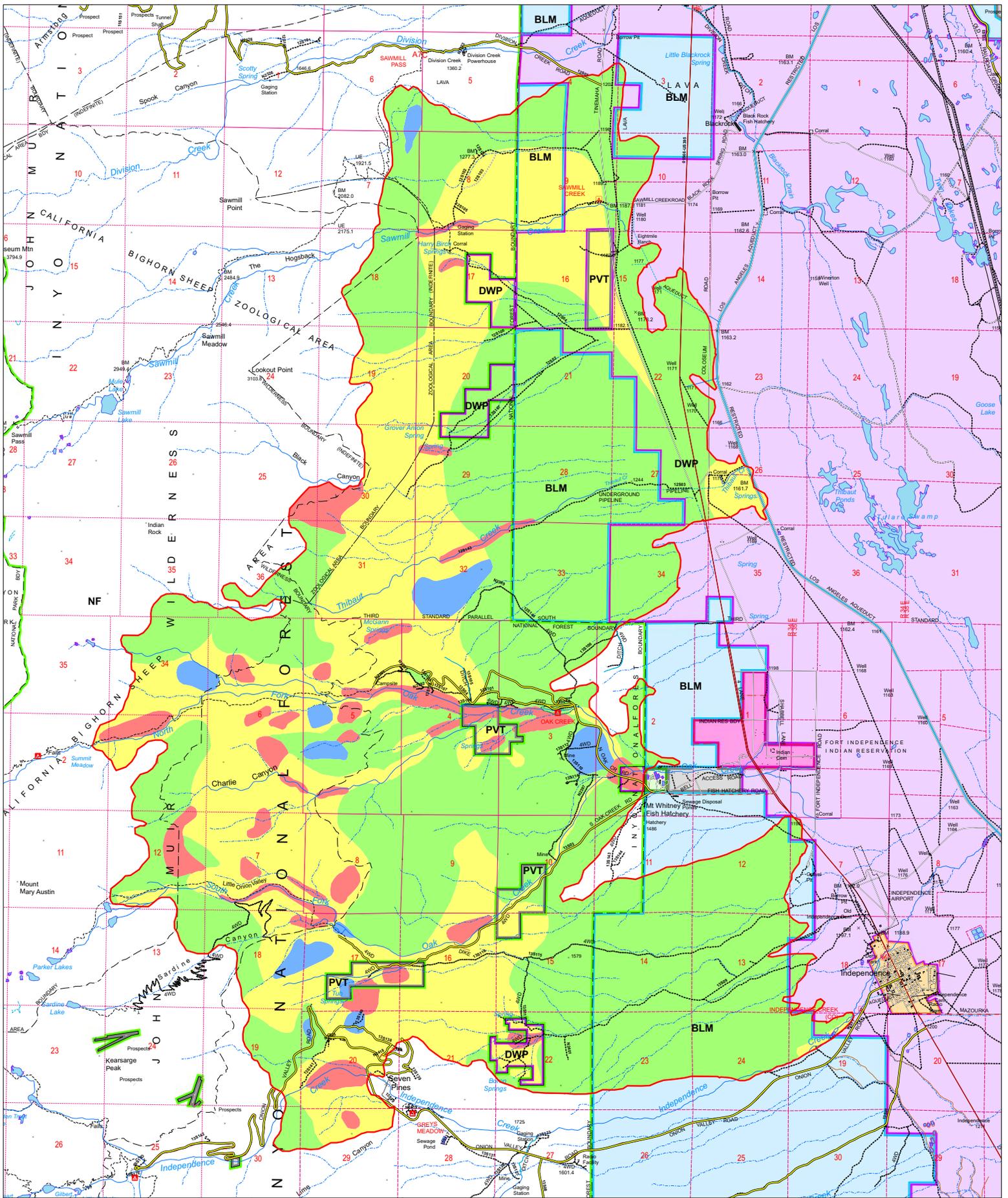
The fire occurred primarily between Big Pine and Independence, California. It started on upper elevation Sierra Nevada mountain slopes and moved downward into the Owens Valley threatening the two communities and, in some locations, burning east of U.S. Highway 395. (See attached map). Both communities were under evacuation orders due to the wildfire's movement into the towns.

The Inyo National Forest has completed their corresponding Burned Area Emergency Rehabilitation (BAER) Plan for Forest land and is coordinating with the Bishop Field Office to ensure consistency of objectives and execution of emergency and rehabilitation objectives to abate fire impacts uniformly over common landscapes.

**II. Description of the Proposed Action:**

The Proposed Action consists predominantly of non-surface disturbing activities such as monitoring for weed infestation, monitoring cultural resources to avert vandalism, and patrolling the burn area frequently to assure vehicles do not travel cross-country. No





**Seven/Oak Fire Burn Severity**  
 Inyo Complex BAER Assessment  
 7/19/2007

surface disturbing activity occurs from these individual physical actions. Any needed surface disturbing actions recommended from monitoring activities would be addressed in future environmental documents.

The area's size, exceeding 4,200 acres, stipulates the preparation of this environmental assessment as identified in the Dept. of Interior 516 Department Manual 2 (Appendix 1) and the BLM Burned Area Emergency Stabilization and Rehabilitation Handbook H-1742-1. Site surface disturbing measures proposed in the burn area include repair/replacement of 2 miles of fence dividing two allotments and are necessary to keep cattle out of the area; installation of approximately 5-10 limited vehicle use signs; and placement of 1-2 visitor information kiosks installed along roads that enter the burn area. The signs and kiosks are designed to notify visitors of area rehabilitation and prohibition of cross-country vehicle use.

The project spans a three-year period – from 2007 to 2010. Upon successful stabilization and restoration of the area's resource values, signs and kiosks would be removed from the site.

Additionally, under this emergency situation, cattle would be prohibited from grazing in the area due to the urgent nature of the fire's impacts. The RMP provides direction for the prohibition, has been analyzed in prior environmental assessments and will not be discussed further. (See Plan Conformance Section below.)

### **III. Plan Conformance:**

The proposed action is subject to the Bishop Resource Management Plan (RMP), approved March 25, 1993. The proposed action conforms with General Policies, Area Manager's Guidelines, Valid Existing Management, Standard Operating Procedures, Decisions and Support Needs prescribed in the Bishop RMP. A review of the RMP indicates the proposed action is in conformance with the plan. The ESP and BAR Plans incorporate the RMP objectives, direction, and policy in its prescriptions. The RMP is a major foundation for the ESP and BAR Plans' prescriptions.

The ESP and BAR Plans conform with the BLM Burned Area Emergency Stabilization and Rehabilitation Handbook H-1742-1. The Handbook provided the guidance and direction for the Plans' development.

The ESP and BAR Plans are consistent with the associated Inyo National Forest Burn Area Emergency Rehabilitation Plans developed for adjoining forest lands affected by the Inyo Complex Wildfire.

The Proposed Action is designed to conform to all Bureau standards and incorporates appropriate guidelines for specific required and desired conditions relevant to project activities.

The proposed closure of the burn area to cattle grazing as an emergency measure is based on RMP direction and Grazing Permit Renewal Stipulations as identified in BLM Decision Record CA-170-07-12.

#### **IV. No Action Alternative:**

The No Action Alternative includes allowing natural regenerative processes to take place with no oversight, stewardship, monitoring, or management. This would conflict with the RMP's specific direction and objectives to manage habitats and landscapes to their natural integrity.

#### **V. Affected Environment/Environmental Consequences:**

The Inyo Complex Fire occurred in the eastern Sierra Nevada mountains on predominately steep, granitic slopes. The lower elevations of the burn, reaching down to the Owens Valley floor, were predominately public land, Department of Water and Power land, and private lands with some occupied by pasture vegetation. The middle portions of the burn were dominated by desert scrub, blackbrush scrub, bitterbrush, riparian, meadow, oak woodland, upper slopes included a mix of pinyon and Jeffrey pine woodland. All of these native vegetation types have evolved with fire, with many species requiring fire to germinate

However, the ecosystem function of this geographic region has been upset by the introduction of non-native species, most especially cheatgrass and red brome. Infestations of non-native species were present from other disturbances, such as roads and trails. The lack of re-establishment of species such as bitterbrush will in turn negatively impact wildlife such as mule deer, by decreasing their supply of winter range forage and habitat.

Due to the geographic location, size, and configuration of the Inyo Complex Fire Burn Area, many resource values do not occur nor exist in the area potentially affected by this proposed action. The following resource list identifies those physical, biological or other pertinent resources BLM considered and discarded from further evaluation because of nonexistence or non-applicability:

- Areas of Critical Environmental Concern
- Environmental Justice
- Essential Fish Habitat
- Farmlands, Prime or Unique
- Floodplains
- Land Uses / Realty / Rights-of-way
- Minerals (Mining Activity)
- Riparian
- Soils (Erosive)
- Threatened & Endangered, Sensitive Vegetation Species
- Threatened & Endangered Wildlife
- Waste, Hazardous or Solid

Water Quality  
Wilderness  
Wild & Scenic Rivers

## A. Air Quality

**Proposed Action:** Air quality would not be affected. The proposed action is within the Mono Basin / Owens Valley federal nonattainment area. Some air quality visibility would be naturally compromised because of destabilized soils and loss of vegetation in the burned area. In the long term, the proposed action should reduce air quality visibility issues as vegetative cover reestablishes itself and soils restabilize, thus reducing airborne dust activity. The action would not result in the emission of PM<sub>10</sub> because the project involves primarily monitoring on existing roads and trails by vehicle or on foot which would release negligible amounts of dust into the air.

**No Action:** Under this alternative, it is more likely destabilized dust and ash created from increased unauthorized cross country vehicle use and its associated disturbances would cause reduced visibility, and drift onto roads, ditches, and low spots where it could hamper traffic and possibly contribute to U.S. Highway 395 closures or traffic accidents.

## B. Consistency with County Planning

### Affected Environment:

The Inyo Complex Fire burn area is located in central Inyo County. Public lands in Inyo County are classified as “Open Space/Multiple Use”. The designation is consistent with Federal law, policy and regulation and supports the BLM mission to execute its multiple use mandate as directed by various authorities, regulations, and policies on public lands.

**Proposed Action:** The proposed action would not be inconsistent with county planning designations for the area classified as Open Space/Multiple Use because BLM is exercising its policy to maintain and manage for biological and physical integrity of public lands. Additionally, the BLM’s strategy to protect habitat integrity and cultural resources is consistent with related county services for residents and motorists in the area.

**No Action Impacts:** The no action alternative would be inconsistent with county planning because BLM would be abrogating its responsibility to maintain and manage the biological and physical integrity of public lands as directed by federal law, regulations, and policy. By taking no action, BLM would neglect a burned area requiring emergency stabilization and thus, exposing the area to weed infestations, deterioration of wildlife habitat, vandalism to cultural resources, etc.

## C. Cultural Resources

### Affected Environment:

Currently, it is not known whether any of the cultural resources within the Inyo Complex Burn Area are eligible to the National Register of Historic Places (NRHP).

The Owens Valley is rich in local history. Numerous archeological sites exist in the area although cultural surveys have been limited. The Owens Valley was a major occupation site of prehistoric peoples dating back 10,000 years. Sites typical of this area include village sites, rock shelters, hunting blinds and rock art. The continuation of use through historic times is evidenced by the remaining elements associated with mining (shafts and tunnels) and ranching (rock corrals and stone house features). Several perennial creeks lie in the burn area where more cultural sites may exist.

**Proposed Action:** The installation of signs as well as area patrols would help reduce cross country vehicle traffic and impacts to newly exposed cultural sites. Cultural surveys would be conducted prior to the fence repair resulting in no impact to cultural resources.

**No Action:** Cultural resource impacts, especially related to prehistoric era resources would occur from off-highway vehicle incursions and associated disturbances if no preventive measures are taken to notify the public of vehicle use restrictions.

#### **D. Environmental Justice**

##### **Affected Environment:**

There are no low-income or minority populations living within the Inyo Complex Incident. Some members of these communities hunt and some do subsistence collecting of materials from public lands such as basket weaving materials, medicinal plants, etc . The Independence and Big Pine Native American community would potentially use the area for traditional gathering although it is unlikely because of the area's inaccessibility and steep terrain. This no known economic value tied to Native American use or relationship to the area.

**Proposed Action:** The proposed action would likely have beneficial effects on native vegetation in the long term as native plants outcompete invasive weed species and become established in the area. This would restore the subsistence environment of grasses, pinyon pine, etc. typical of the area and important to the Tribe. There would be no disproportionate impacts to low income or minority groups, per Executive Order 12898 (2/11/94).

**No Action:** This alternative would lessen the availability of natural materials important to the Native American Tribe in the short term. Since most of the public land in the proposed action are on steep, inaccessible slopes, it would affect gathering practices very little.

#### **E. Invasive, Non-Native Species**

### **Affected Environment:**

Red brome (*Bromus madritensis*), cheatgrass (*Bromus tectorum*), bull thistle (*Cirsium vulgare*), storksbill (*Erodium cicutarium*), perennial pepperweed (*Lepidium perfoliatum*), sweet clover (*Melilotus alba/officinalis*), rabbitsfoot grass (*Polypogon monspeliensis*), black locust (*Robinia pseudoacacia*), Russian thistle (*Salsola tragus*), and tumble mustard (*Sisymbrium* sp.) are known to occur within the burn area and along access routes to the burn. In addition, perennial sweet pea (*Lathyrus latifolius*) and saltcedar (*Tamarix ramosissima*) are known from locations less than a half a mile away from the burn perimeter.

Several plant vectors such as roads, trails, wind, and waterways occur within the fire area. In addition, seed could have been transported into the burn on suppression equipment and supplies. Fire is known to enhance the establishment of all weed species present.

**Proposed Action:** The proposed action would reduce the spread of weeds by limiting the amount of soil disturbance caused by erosion. Weed detection surveys would also identify new infestations and expedite eradication or control. However, regardless of completing weed surveys and noxious weed treatments cheatgrass and red brome would remain a threat to ecosystem health and function. No effective or feasible treatments or management are known to reduce this threat.

**No Action:** If no treatments are implemented then the likelihood of invasive weed infestations is more probable due to increased soil disturbance and lack of early detection. The costs associated with treating weed infestations once they have become extensive are usually very high and may make eradication or control unobtainable.

## **F. Vegetation**

### **Affected Environment**

The predominant plant communities within the BLM fire perimeter are; desert scrub, blackbrush scrub, bitterbrush scrub, riparian, meadow, oak woodland, pinyon pine woodland and Jeffrey pine forest.

Alluvial fan desert scrub consisting of primarily green rabbitbrush (*Chrysothamnus teretifolius*), Mormon tea (*Ephedra viridis*), California buckwheat (*Eriogonum fasciculatum* var. *polifolium*), cheesebush (*Hymenoclea salsola*), winterfat (*Krascheninnikovia lanata*), horsebrush (*Tetradymia axillaris*), and desert needlegrass (*Acnatherum speciosum*) is the most dominant vegetation type in both burn areas. The success of desert scrub vegetation re-colonizing the burn will depend on the density and cover of weed infestations. Brome (*Bromus* sp.) and Russian thistle (*Salsola tragus*) infestations already exist in disturbed sites adjacent to and within burned desert scrub. The fire has reduced the level of vegetative competition for water and nutrients, which may allow weed infestations to spread. Large infestations would drastically limit the growth and reproduction of native species and may lead to vegetation type conversion.

Alluvial fan blackbrush scrub, dominated by a canopy of blackbrush (*Coleogyne ramosissima*) with common intermittent species being green rabbitbrush, Mormon tea, California buckwheat, winterfat, and desert needlegrass is found at slightly higher elevations than desert scrub throughout the burn areas. Similar to desert scrub, blackbrush scrub recovery depends on the density and cover of cheatgrass, red brome, and Russian thistle infestations.

Riparian vegetation dominated by water birch (*Betula occidentalis*), black cottonwood (*Populus balsamifera* ssp. *trichocarpa*), willows (*Salix* sp.), and occasional Jeffrey pine (*Pinus jeffreyi*) is distributed in several canyons, creeks, and springs throughout both burn areas. In most locations, riparian vegetation burned with moderate intensity. The dominant vegetation is expected to fully recover over the next few years through re-sprouting. Seedling establishment of willows, cottonwood, and water birch is expected to occur naturally in sandbars created by sediment deposition.

Meadow vegetation associated with the Baker Creek drainage is found on LADWP land on the eastern perimeter of the Sage Fire. The meadows are dominated by several herbaceous species including yarrow (*Achillea millefolium*), bentgrass (*Agrostis* sp.), sedge (*Carex* sp.), spike rush (*Eleocharis* sp.), willow herb (*Epilobium* sp.), rush (*Juncus* sp.), Kentucky bluegrass (*Poa pratensis*), cinquefoil (*Potentilla* sp.), and hoary nettle (*Urtica dioica*). The edges of the wet meadows are typically dominated by shrubby species including silver wormwood (*Artemisia ludoviciana*), wood rose (*Rosa woodsii*), and willow (*Salix* sp.). These meadows should readily regenerate post fire, due to the moderate fire severity they experienced and the dominant species ability to re-sprout and germinate post fire. The only factor that may limit regeneration success would be increased weed infestations (e.g. bull thistle, black locust, sweet clover) competing with natives.

Oak riparian woodland, dominated by a canopy of primarily black oak (*Quercus kelloggii*) interspersed with water birch, black cottonwood, and Jeffrey pine is located along Independence Creek and the North and South Forks of Oak Creek in the Seven Oaks Fire. These oak woodlands provide important wildlife habitat. Interior live oak (*Quercus wislizenii*) and oracle oak (*Quercus X morehus*) also occur in these stands on Independence Creek and the North and South Forks of Oak Creek. These are the only known populations of interior live oak and oracle oak east of the Sierra Nevada crest. Most populations of oak burned at low to moderate intensity. These intensities should allow for re-sprouting, particularly stump sprouting, to occur, provided adequate water is available, and invasive species do not prevent recovery. Full recovery of oak woodland stand structure is expected to take several decades.

Pinyon pine woodland, dominated by an intermittent canopy of single-leaf pinyon (*Pinus monophylla*) with an understory of mountain sagebrush (*Artemisa tridentata* ssp. *vaseyana*), Mormon tea, bitterbrush, squirreltail (*Elymus elymoides*), and needlegrass is found in the steeper, higher elevations of both burns. Pinyon pine does not regenerate quickly after fire (200-300 years). Pinyon pine can be restricted by cheatgrass, which is present, although not excessive, throughout most of the burn areas. If cheatgrass becomes well established it could severely limit pinyon re-vegetation by making the fire frequency too recurrent for pinyon pine establishment and reproduction.

Jeffrey pine forest, dominated by an intermittent canopy of Jeffrey pine (*Pinus jeffreyi*) with an understory of mountain mahogany (*Cercocarpus ledifolius*), mountain sagebrush, snowberry (*Symphoricarpos longiflorus*), and gooseberry (*Ribes inerme/viscosissimum*) is found in the steepest, highest elevations of both burns. Emergent red fir (*Abies magnifica*) is also typical of this

community. These plants have evolved with fire and will rapidly regenerate in the burn by seeding, especially since weed infestations should not be significant competitors.

No threatened or endangered plant species are known to exist within the burn, or within several miles. Forest Service sensitive species Owen's Valley Checkerbloom (*Sidalcea covillei*) has been documented on LADWP land on the eastern boundary of the Sage Fire and Dedecker's clover (*Trifolium dedeckeriae*) has been found on FS land on the western boundary of the Seven Oaks Fire. Watch list species stiff lomatium (*Lomatium rigidum*) and frog's bit buttercup (*Ranunculus hydrocharoides*) are known to exist within the southern third of the Seven Oaks Fire. The frog's bit buttercup population is located on private land and will not be discussed further.

Invasive weed species red brome (*Bromus madritensis*), cheatgrass (*Bromus tectorum*), bull thistle (*Cirsium vulgare*), storksbill (*Erodium cicutarium*), perennial pepperweed (*Lepidium perfoliatum*), sweet clover (*Melilotus alba/officinalis*), rabbitsfoot grass (*Polypogon monspeliensis*), black locust (*Robinia pseudoacacia*), Russian thistle (*Salsola tragus*), and tumble mustard (*Sisymbrium* sp.) are known to occur within the burn area and along access routes to the burn. In addition, perennial sweet pea (*Lathyrus latifolius*) and saltcedar (*Tamarix ramosissima*) are known from locations less than half a mile away from the burn perimeter.

**Proposed Action:** The proposed action would increase the likelihood of native re-vegetation by limiting the infestation of nonnative weeds. However, regardless of completing weed surveys and noxious weed treatments cheatgrass and red brome would remain a threat to ecosystem health and function. No effective or feasible treatments or management are known to reduce this threat.

**No Action:** If no action is taken, then the likelihood of invasive weed infestations is more probable due to a lack of early detection and control. Costs associated with treating weed infestations once they have become extensive would be higher and may make eradication or control unobtainable.

## **G. Visual Resources**

### **Affected Environment**

The area is classified as a Visual Resources Management (VRM) III area in the Bishop RMP (1993). This means that any management action in this classification area must partially retain the existing character of the landscape. The level of change to the landscape should be moderate. The changes may be seen from key observation points (KOPs) such as highways, campgrounds, etc. but should not attract the attention of the casual observer.

The burn area currently appears as a charred lunar landscape with little to no vegetation and numerous burnt snags, limbwood, and skeletal desert brush. Most of the burn area on BLM land is above the private land that borders it. From U.S. Highway 395 which is the main KOP, the motorist can observe broad vistas of moderate to steep reaches of the burned areas.

**Proposed Action:** The proposed action would conform with the VRM III standard because the proposed fence repair and sign/kiosk installation would not be seen from the highway or nearby areas used by the public. The proposed monitoring would have not a visual impact because only footprints or vehicle tracks on the access routes would be left once surveys are completed.

**No Action:** The No Action alternative would have little to no impact on the VRM standards because the exclusion of signs and the proposed fence repair could not be seen from the KOPS, making no material difference in impacts between the two alternatives.

## **H. Wildlife**

### **Affected Environment**

There has been a significant, cumulative loss of key mule deer winter range for the Goodale mule deer herd due to the numerous fires in the area, and the short ecosystem recovery interval between those fires.

**Proposed Action:** The proposed action would increase the likelihood of native re-vegetation, specifically bitterbrush, by limiting the infestation of nonnative weeds in the long term. The proposed signs and kiosks as well as patrols would reduce cross country vehicle use in the area, increasing natural vegetation regeneration and use by mule deer. In addition, because of the fire intensity associated with the Inyo Complex, it is likely given past ecological recovery of adjacent fires, that bitterbrush (*Purshia tridentata*) the key winter forage species for mule deer, will regenerate slowly (15-20 years) .

**No Action:** If no action is taken, then the likelihood of invasive weed infestations, is more probable due to a lack of early detection. If these infestations become ubiquitous there would most likely be a significant detrimental impact on deer winter range forage.

## **VI. Cumulative Effects:**

Cumulative effects of the proposed action are largely confined to the Owens Valley and the east-central Sierra Nevada ecotone which has endured several wildfires in the last decade. Emergency actions of these past wildfires have included similar actions as those described in this environmental assessment i.e. protection of cultural resources, monitoring for spread of invasive species, etc.

This proposal would initiate restoration and stability of natural functioning processes impaired by past wildfire destruction primarily through oversight, monitoring, and evaluation. It is believed the effect would be positive in facilitating native plant reestablishment and soil stability, safeguarding cultural resources, and reducing impacts from cross-country vehicle use.

This project is not expected to contribute to cumulative effects because the nature of this proposal and its impacts are such that it would benefit natural processes to restore itself,

subsequently averting negative impacts to other resources affected i.e. cultural, wildlife habitat, plant reestablishment, etc. Expected negative impacts from the sign/kiosk installation and fence/gate repair are negligible and facilitate the project's anticipated outcomes. This project does not have significant impacts upon the human environment.

## **VII. Persons and Agencies Consulted**

Todd Ellsworth – Inyo National Forest Soils Scientist and BAER Team Leader

Casey Shannon – Inyo National Forest Hydrologist and BAER Team Member

## **VIII. Public Involvement**

The Inyo National Forest has published notification of the emergency stabilization and rehabilitation measures for public lands affected by the wildfire in the local Inyo Register newspaper. A meeting with the Bishop Paiute Tribe was held on July 26, 2007. The topic of the emergency stabilization and rehabilitation measures were discussed with the Tribe by Kirk Halford (Bishop BLM Program Archeologist) and Garry Oye (Bishop Inyo National Forest District Ranger.) The Tribal members supported the proposals.

BLM also will publish this Environmental Assessment on its website, making it available for public review and appeal.

## **IX. Preparers**

Katie VinZant – BLM Bishop Field Ecologist, ESP and BAR Team Leader

William Kerwin – BLM Bishop Archeologist

Joe Pollini – BLM Bishop Environmental Coordinator and Asst Field Manager

Terry Russi – BLM Bishop Supervisory Wildlife Biologist

**Reviewed By:**     /s/ Joe Pollini      
**Environmental Coordinator**

**Date:**     September 5, 2007