



United States Department of the Interior  
FISH AND WILDLIFE SERVICE  
Fire Management Branch  
National Interagency Fire Center  
3833 South Development Avenue  
Boise, Idaho 83705



September 12, 2005

To: Regional Director, Region 1, Portland, Oregon  
From: Acting Chief, Fire Management Branch, Boise, Idaho /s/ Brian McManus  
Subject: McLane Fire Emergency Stabilization Plan Approval

The plan indicates the cause of the fire was an escaped agricultural burn. Since suppression, emergency stabilization, and burned area rehabilitation costs will exceed \$2 million, it is important that the ongoing fire trespass investigation and prosecution continue in order to recover these costs.

It is obvious that the refuge worked hard to put this plan together. There are only few areas where there is conflicting information (e.g., the need to install signage warning public users of hazards and to protect fragile fire area from being impacted by public use when the burned area is closed to public use) and specifications in Part F referencing (ESR Reference #) an Emergency Stabilization and Rehabilitation Handbook which became obsolete after the 2003 fire season when Departmental policy separated emergency stabilization and rehabilitation into unique activities. In addition the individual specifications lack sufficient NFPORS related information for accurate NFPORS data entry. All future emergency stabilization and burned area rehabilitation planning should use the Department of the Interior planning templates found at: <http://fire.r9.fws.gov/ifcc/Est/Planning/BAERplan.htm> and <http://fire.r9.fws.gov/ifcc/Est/Planning/BARplan.htm>. Overall the plan provided the necessary information for assessing subactivity appropriateness.

Five treatments were misidentified as emergency stabilization and will be funded with burned area rehabilitation (9262) funding.

1. The Ecological Stabilization - Native Seeding treatment objectives presented in the plan are to *stabilize ecological integrity of native shrub steppe community, prevent invasion of noxious weeds and non-native species, and to limit erosion and stabilize soils.* Departmental policy (620 DM 3.7.M) identifies three allowable actions relative to seeding:
  - *Actions to stabilize soil to prevent loss or degradation of productivity.*
  - *Seeding or planting to prevent permanent impairment of designated Critical Habitat for Federal and State listed, proposed or candidate threatened and endangered species.* This is irrelevant since the burned area is not designated Critical Habitat

- *Seeding to prevent establishment of invasive plants, and direct treatment of invasive plants. Such actions will be specified in the emergency stabilization plan only when immediate action is required and when standard treatments are used that have been validated by monitoring data from previous projects, or when there is documented research establishing the effectiveness of such actions.*

Stabilizing the ecological integrity in itself is not an allowable emergency stabilization action; although, *repairing or improving lands unlikely to recover naturally from wildland fire damage by emulating historical or pre-fire ecosystem structure, function, diversity, and dynamics consistent with existing land management plans* is an allowable rehabilitation action.

Most of the targeted invasive species had already invaded the burned area prior to the fire and may even be considered naturalized to the site. Post-fire reseeding treatments have demonstrated that seeding in combination with herbicide treatments does not prevent the establishment or reestablishment of invasive species (e.g. cheatgrass) but only at best reduces and retards the establishment or reestablishment of the invasive<sup>1</sup> as well as other species that remained viable in the seedbank<sup>2</sup>. However, the proposed seed mix given sufficient winter and spring rainfall should prove effective in initiating post fire rehabilitation.

The seeding proposed will not limit erosion and stabilize the soil significantly more than natural recovery. It is not planned until next December or January with germination expected in the spring (the same approximate time when the native seed bank germinates), and the pre-seeding herbiciding will actually exacerbate erosion by reducing natural fall revegetation.

2. Non-native Invasive Species Control – Native Plantings treatment is appropriately funded with 9262 funding because the burned area contains no designated Critical Habitat and the stated objective is *...planting native shrub/tree seedlings ... to **rehabilitate** impacted shrub-steppe and riparian plant communities ....*
3. Replacing minor fences (Protective Fencing) is an appropriate rehabilitation treatment. Since the fences are needed to protect the seeding and planting in the above rehabilitation treatments the protection of those rehabilitation treatments should be funded similarly.
4. Since most of the Effectiveness Monitoring activity is to monitor the effectiveness of the above seeding and planting treatments, this activity should also be funded with 9262 funds.
5. Since a majority of the Implementation Leader's work load will be associated with the

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1 24 Command Fire ESR Plan Final Accomplishment Report; [Vegetation Recovery Report, Arid Land Ecological Area, TNC 2005](#); and numerous BLM Great Basin post-fire seeding treatments.

2 Keeley, J.E. 1994. To Seed or not to Seed? Wildfire. March Issue. Conard, S.G., J.C. Regelbrugge, and R.D. Wills. 1991. Preliminary Effects of Ryegrass Seeding on Post-fire Establishment of Natural Vegetation in two California Ecosystems. In: 1 1th Conference on Fire and Forest Meteorology. Missoula, Montana. 8 pp. Keeley, J.E. 2004. Ecological impacts of wheat seeding after a Sierra Nevada wildfire. International Journal of Wildland Fire, 2004, 13, 73–78.

seeding, planting and treatment effectiveness monitoring treatments, this activity should also be funded with 9262 funds.

Two treatments also need amending.

1. Reducing the Non-native Invasive Species Control – Integrated Pest Management treatment by \$3,469 because the Wildlife Biologist needed for treatment monitoring is already addressed in the Effectiveness Monitoring activity - ...to determine the effectiveness of *non-native invasive species control*, native ...
2. Reducing the Protective Fencing treatment by \$89,336 because the \$3,000 WG-10 Maintenance Foreman contract oversight and administration is addressed in the Implementation Leader activity and fencing and materials costs estimates should be the same as those in the Weather Station ES Plan: \$41,040 fence materials – based on the Weather Station ES Plan costs of \$2,564 / mile instead of the proposed \$7,695 / mile, and \$45,296 construction – based on the Weather Station ES Plan cost of \$5,662 / mile instead of the proposed \$11,324 / mile. This office will consider further funding authorization contingent upon receiving copies of the estimates obtained from the 2-3 independent contractual sources identified in the plan justifying the additional costs.

The plan does not clearly identify when (beginning with contracting) each treatment or activity should begin (again, use of Department of the Interior planning templates is recommended); therefore, all treatments and activities will be budget allocated in FY2005 and you are authorized to expend up to the amounts indicated below for each individual treatment or activity:

9142: \$ 351,780

\$ 341,697: Non-Native Invasive Species Control – Integrated Pest Management

\$ 2,520: Public Safety – Hazard Warning Signs

\$ 7,563: Plan Preparation

9262: \$1,612,251

\$ 1,333,868: Ecological Stabilization – Native Seeding

\$ 60,220: Ecological Stabilization – Native Plantings

\$ 90,341 Protective Fencing

\$ 49,003: Effectiveness Monitoring

\$ 79,080: Implementation Leader

By contractually and operationally consolidating the Weather Station and McLane Fire activities, there may be some significant efficiency and economic saving opportunities.

The cost structure established for the McLane Fire emergency stabilization and burned area rehabilitation actions are 9142-B2U2 and 9262-B2U2.

The Branch of Fire Management Staff has entered plan data into NFPORS. However, because of the lack of NFPORS related information provided in the plan, each treatment is entered spanning the FY2005 – 2006 fiscal years and the plan completion dates are only estimates and should be reviewed and validated at your earliest convenience. It is also imperative that when a treatment or activity is completed, those accomplishments are entered into NFPORS immediately in order

to release any unexpended funds for others projects.

The required electronic version of the plan with above changes needs to be sent to this office as soon as possible. This memo will suffice as an amendment to the plan at this time. However, if in the future this plan needs to be amended or a burned area rehabilitation plan is developed, these changes should be incorporated into the plan at that time.

As a reminder, Annual Accomplishment Reports must be completed no later than the end of each fiscal year, must document actual accomplishments, costs and monitoring results, and must be kept in field unit project files. For national office use, annual accomplishments are summarized and reported in the NFPORS Actual FY 20XX Accomplishment field on the NFPORS treatment/activity form no later than the end of each fiscal year. Actual fiscal year expenditures and monitoring results can be included in the Notes field on the treatment/activity form. The NFPORS Notes field has a maximum capacity of 1500 characters (approximately 200 words) so report only total fiscal year implementation cost expenditures and briefly summarize fiscal year treatment/activity monitoring results. The Final Accomplishment Report will report plan activities in sufficient detail to document all accomplishments, implementation costs and monitoring results. For this plan the Final Accomplishment Report must be completed no later than August 11, 2008. An electronic copy of the Final Accomplishment Report is to be provided to the Branch of Fire Management in Boise, Idaho, and is posted on the Service's Emergency Stabilization and Burned Area Rehabilitation web site.

If you have questions or need additional information pertaining to this plan or ES&R policy and process, please contact Bill Leenhouts – National Burned Area Emergency Response Coordinator - in this office at 208-387-5584.

cc:

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