



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



July 15, 2007

To: Regional Director, Region 1, Portland, OR
From: Chief, Branch of Fire Management, Boise, ID
Subject: Para Fire Burned Area Emergency Stabilization Plan

Branch review of the Para Fire Burned Area Emergency Stabilization Plan indicated that it included a treatment that is not allowable under Department of the Interior Manual 620 DM 3 policy. Unfortunately, this issue was not discovered until after approval of the plan because the required national review was not requested prior to regional approval. The specific issue is the Non-native Invasive Species Control specification which proposes *planting native shrub/tree seedlings...to rehabilitate riparian and shrub-steppe plant communities as critical habitat for listed and sensitive species* which is not a 620 DM 3.7.M allowable action. Allowable under 620 DM 3.7.M is:

- *Seeding or planting to prevent permanent impairment of designated Critical Habitat for Federal and State listed, proposed or candidate threatened and endangered species. There is no designated Critical Habitat at Columbia NWR (see <http://crithab.fws.gov/>).*
- *Seeding to prevent establishment of invasive plants, and direct treatment of invasive plants. The proposed treatment is for planting not seeding and contrary to its title for plant community rehabilitation not invasive species prevention.*

The proposed treatment would be an allowable Burned Area Rehabilitation action under 620 DM 3.8.M (*repair or improve 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*) and eligible for Burned Area Rehabilitation funding. I see no need to develop the required separate Burned Area Rehabilitation Plan for just this treatment unless the refuge is already anticipating doing so for additional Burned Area Rehabilitation purposes.

With your concurrence, the Branch will establish the appropriate financial cost structure, budget allocate \$16,321 of Emergency Stabilization (9142) funds to the region, and include \$18,737 for Burned Area Rehabilitation funding consideration. Please send the Branch a complete electronic copy of the Para Fire Burned Area Emergency Stabilization Plan (including Appendix V – Maps and specific individual specification planned initiation and completion dates [mm/dd/yy]) so that we can initiate budget allocation and National Fire Plan Operations and Reporting System data entry.

In addition the plan reports that: *The fire was a result of an escaped private controlled burn being conducted by Jake Para (inholding land-owner). The controlled burn was never communicated to any fire and/or refuge management personnel. This has happened several times in the last 15 years in this same area, resulting in cumulative losses in native vegetation, in particular native riparian shrubs and trees (e.g., Wood's rose, currents, willows).* Fire trespass legal action should be taken against Jake Para to attempt to change his behavior and recover all suppression and post-wildfire recovery costs.

Please let me know if you wish to proceed with the budget allocations specified above, and with an update on the status of the legal action and cost recovery against Jack Para. National Burned Area coordinator Bill Leenhouts (208-387-5584) can assist your staff with any Emergency Stabilization and Burned Area Rehabilitation questions, and National Fire Operations Specialist Rod Bloms (208-3875599) can assist with any questions regarding fire trespass.

cc: Regional Chief, NWRS, Portland, OR
Refuge Supervisor, Portland, OR
Regional Fire Management Coordinator, Portland, OR
Project Leader, Mid-Columbia River NWRC, Richland, WA
National Emergency Stabilization and Burned Area Coordinator, Boise, ID