

From: [Davis, Dawn](#)
To: [Deibert, Pat](#)
Cc: [Mary Grim](#)
Subject: Re: Prescribed Fire Drop-in Language
Date: Wednesday, February 25, 2015 11:52:02 AM

Pat,

The proposed fire drop-in language is in conflict with our recommendations to avoid prescribed fire in sage-grouse habitat with <12" of annual precipitation. Resilience of native sagebrush ecosystems to stress and disturbance changes along climatic and topographic gradients. Although resilience to disturbance, such as wildfire, has been shown to increase along these elevational gradients, areas characterized by Wyoming big sagebrush ecosystems with low to moderately low resilience and resistance are currently of greatest concern for sage-grouse conservation, in part, because they are unlikely to recover in a reasonable amount of time following wildfire or other disturbances. Use of prescribed fires to manage big sagebrush in low (<12 inch) precipitation zones is not supported in the scientific literature and may result in significant impacts to sage-grouse.

Recovery following prescribed fire is unlikely and the risk of annual invasives is high in low elevation Wyoming big sagebrush communities with relatively low resilience and resistance and the use of prescribed fire should be avoided (unless evaluation of site specific conditions demonstrate that there will be a net benefit for sage-grouse). Prescribed fire as a vegetation or fuels treatment in Wyoming big sagebrush sites or other xeric sagebrush species sites, or in sites with a potential for post-fire exotic annual dominance should be avoided. The use of prescribed fire in Wyoming big sagebrush communities or sagebrush habitats that provide important winter habitat resources for sage-grouse should be avoided. If prescribed fire is used in sage-grouse habitat, fire operations and fuels management decisions should be informed by resilience and resistance concepts.

On Wed, Feb 25, 2015 at 9:34 AM, Deibert, Pat <pat_deibert@fws.gov> wrote:

----- Forwarded message -----

From: **Carman, Stephanie** <scarman@blm.gov>
Date: Tue, Feb 24, 2015 at 3:06 PM
Subject: Prescribed Fire Drop-in Language
To: Pat Deibert <pat_deibert@fws.gov>, Matt Kales <matt_kales@fws.gov>
Cc: Glen Stein <gstein@fs.fed.us>

We are proposing the below addition to the prescribed fire drop-in language, which was inadvertently left off of the guidance. Thank you for bringing this to our attention. Please let us know if this addresses it adequately.

*"If prescribed fire is used in Greater Sage-Grouse habitat **with less than 12"** of annual precipitation, the NEPA analysis for the Burn Plan will address:*

- *why alternative techniques were not selected as a viable options;*
- *how Greater Sage-Grouse goals and objectives would be met by its use;*
- *how the COT Report objectives would be addressed and met;*
- *a risk assessment to address how potential threats to Greater Sage-Grouse habitat would be minimized.*

- a) Allow prescribed fire as a vegetation or fuels treatment in Wyoming big sagebrush sites or other xeric sagebrush species sites, or in areas with a potential for post-fire exotic annual dominance only after the NEPA analysis for the Burn Plan has addressed the four bullets outlined above. Prescribed fire could be used to meet specific fuels objectives that would protect Greater Sage-Grouse habitat in PHMAs (e.g., creation of fuel breaks that would disrupt the fuel continuity across the landscape in stands where annual invasive grasses are a minor component in the understory, burning slash piles from conifer reduction treatments, used as a component with other treatment methods to combat annual grasses and restore native plant communities).*
- b) Allow prescribed fire in known winter range only after the NEPA analysis for the Burn Plan has addressed the four bullets outlined above. Any prescribed fire in winter habitat would need to be designed to strategically reduce wildfire risk around and/or in the winter range and designed to protect winter range habitat quality."*

Stephanie Carman

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