



FINDING OF NO SIGNIFICANT IMPACT
Greater Sand Dunes Interagency
Fire Management Plan
Great Sand Dunes National Park and Preserve
Alamosa and Saguache Counties, Colorado

SUMMARY

The National Park Service (NPS) at Great Sand Dunes National Park and Preserve (GRSA) has selected “Alternative 3 (Preferred): Fire Suppression and Fuels Management Plus Wildland Fire Use” as analyzed in the “Greater Sand Dunes Interagency Fire Management Plan: Environmental Assessment/Assessment of Effect; April, 2005”.

PURPOSE AND NEED

GRSA is subject to agency policies and guidelines that direct wildland fire management. NPS *Director’s Order #18: Wildland Fire Management (DO-18)* states, “Each park with vegetation capable of burning will prepare a Fire Management Plan (FMP) to guide fire management that is responsive to the park’s natural and cultural resource objectives and to safety considerations for Park visitors, employees, and developed facilities.” As part of the environmental analysis related to the development of the FMP, an Environmental Assessment/ Assessment of Effect (referred to as the “EA”) and Biological Assessment (BA) was prepared. The FMP and associated EA and BA will establish the future management direction for fire related activities at GRSA.

Project Goal. The overall goal for this project is to develop and implement an interagency, comprehensive, ecologically based Fire Management Plan for the approximately 275,000 acre Greater Sand Dunes project area which includes the Great Sand Dunes National Park and Preserve, the Baca National Wildlife Refuge, and the Medano-Zapata Ranch (The Nature Conservancy). The FMP will create a fire management program that will protect human life and safety, facilities and properties, and natural and cultural resources and values. The plan will follow the Interagency Fire Management Plan Template and be supported by a rigorous environmental analysis.

Goal 1 - Provide for the protection of human health and safety during all phases of the interagency fire management program.

Goal 2 - Develop and implement an interagency Fire Management Plan that specifically addresses the individual fire management needs of the National Park Service, U.S. Fish and Wildlife Service, and The Nature Conservancy, while promoting interagency participation across the greater landscape of the San Luis Valley.

Goal 3 - Protect facilities, natural resources, and cultural resources from unplanned wildland fires.

Goal 4 - Apply fire management techniques in a coordinated manner to accomplish desired resource management objectives.

Goal 5 - Protect air and water quality-related values across all affected airsheds and watersheds in the area.

Goal 6 - Base the interagency fire management program on sound data obtained through scientific investigation and monitoring.

Goal 7 - Provide educational opportunities for the public regarding fire ecology, management and operations.

PROPOSED ACTION

ALTERNATIVE 3 (PREFERRED): Fire Suppression and Fuels Management plus Wildland Fire Use

The Fire Suppression and Fuels Management Plus Wildland Fire Use Alternatives (alternative 3) is the preferred alternative for fire management within the planning area. Alternative 3 is based on the “natural fire regimes” and/or “desired future conditions” of ecological systems, as well as local collaborative processes for ensuring community protection needs and firefighter and public safety. This alternative would allow for fuels management activities, including manual and mechanical treatments and prescribed fires, and fire suppression. Under Alternative 3 Wildland Fire Use for Resource Benefits (WFURB) would be allowed within portions of the planning area. Where boundaries are shared, similar fire management goals and objectives would be met through joint operations and shared positions, wherever possible.

Under Alternative 3, the planning area would be divided into three fire management units (FMUs): the Herard FMU, the Mosca FMU, and the Baca-Dunes FMU.

The Herard FMU includes the portion of the Great Sand Dunes National Preserve located north of Medano Pass Road. The entire FMU is located within designated wilderness. Based on the fire histories presented in the EA, this portion of the planning area is within its natural range of variability for fire, and therefore, fuels treatment activities are not necessary to return the site to its natural condition. The primary goals of fuels treatments within the Herard FMU would be to perpetuate fire as a natural ecological process, achieve ecosystem sustainability, protect the unit perimeters and jurisdictional boundaries, and protect visitors and cultural resources.

To meet the stated goals, the Herard FMU would have a broad parameter wildland fire use prescription with an AMR along the unit boundaries. Limited manual fuel treatment and prescribed fires along the unit’s perimeters and along jurisdictional boundaries and around specific sites would be utilized for cultural resource and visitor protection.

The Mosca FMU includes lands primarily south of the Medano Pass Road within the Grant Sand Dunes National Preserve. The majority of the FMU is located within designated wilderness except for the Mosca Pass Road. Based on the fire histories presented in this EA, this portion of the planning area is within its natural range of variability for fire, and therefore, fuels treatment activities are not necessary to return the site to its natural condition. However, because this unit has a number of sensitive resources and is closer to the wildland-urban interface, limited wildland fire use would be applied. The primary goals for the Mosca FMU

would be to perpetuate fire as a natural ecological process, achieve ecosystem sustainability, protect the unit's perimeters and jurisdictional boundaries, and protect visitors, cultural resources, and improvements.

The Mosca FMU would have a limited parameter WFURB prescription. An Appropriate Management Response (AMR) would be utilized along the unit and jurisdictional boundaries. Fuels treatments would include manual hazardous fuels reduction and prescribed fire for cultural resources, visitors, and wildland-urban interface protection. Fuels work within the Mosca FMU would occur along unit perimeters and jurisdiction boundaries, around cultural resources, in areas designated as necessary for visitor protection, along access roads including the Medano Pass Road corridor, and around improvements including the onsite communication towers.

The Baca-Dunes FMU would include all lands within Great Sand Dunes National Park, the Baca National Wildlife Refuge, and Medano-Zapata Ranch. This FMU would not include the Preserve, which would be included in the Herard and Mosca FMU's. The Baca- Dunes FMU includes designated and proposed wilderness areas as well as non-wilderness areas. Because this FMU has a number of cultural resources, occurs closer to the wildland-urban interface, and poses a number of safety concerns, wildland fire use for the resource benefit would not be allowed within this unit.

All wildfires would be controlled with an AMR throughout the Baca- Dunes FMU to protect cultural resources, visitors, and property. To the extent possible, indirect suppression activities using existing roads and natural barriers would be employed. Fuels treatments within the Baca-Dunes FMU would include manual and mechanical fuels treatments and prescribed fire. The goals of the fuels treatments within the Baca-Dunes FMU would be to protect cultural resources, visitors, and the wildland- urban interface, protect the unit's perimeters and jurisdictional boundaries, and manage habitat to meet specific wildlife management objectives.

All unplanned wildland fires throughout the entire planning area will be managed using the AMR, which may include aggressive initial attack, indirect attack, or wildland fire use for resource benefit, depending on the location and conditions. The following fire strategies may be applied to the three FMUs:

- **Fire Suppression** – The current and predicted wildland fire situation will be analyzed carefully when determining the appropriate suppression method(s). All actions necessary to quickly and safely manage a wildland fire must be determined. The wildland fire suppression method(s) will also be commensurate with the wildland fire's potential to spread or to cause undesirable social, economic, and/or ecological impacts, the value of threatened resources, as well as the FMU fire management goals. Depending on the FMU, a range of response tactics may be appropriate. A rapid response is often important for safety and cost efficiency. Tactics will be unique to each incident dependent on safety considerations, weather conditions, cost of suppression, fuel conditions, availability of resources and location of the fire in relation to values at risk. Specific tactics will be determined by the on-scene Incident Commander (IC). In

addition, Minimum Impact Suppression Tactics (MIST) will be employed whenever possible.

- **Manual and Mechanical Fuels Treatments** - The primary goal of the manual and mechanical fuels treatments will be to reduce fuel loads in areas with resources at risk that have heavy fuel accumulations and/or to protect the wildland urban interface. Treatment sites will include areas of high visitor use, around structures and developments, along the perimeters and jurisdictional boundaries, around cultural resources, and in other areas with values that could be adversely affected by prescribed and/or wildland fires. The range of actions for manual and mechanical treatments may include selective thinning of brush and smaller trees, limbing trees to a certain height above the ground surface, removing all trees within a certain range of diameters, or selectively removing trees or other vegetation of any size class to achieve desired crown spacing or clearance zones. Thinning projects will primarily involve using chainsaws or, in wilderness areas, hand-saws. Grass and smaller diameter trees may be trimmed or removed using a variety of tools including hand tools up to and including gasoline powered grass trimmers and brush cutters in non-wilderness areas. Vegetation will be disposed of in select areas by chipping with a mechanical chipper, scattering of smaller brush and trees on-site away from sensitive resources, pile burning slash, and/or hauling from the site for disposal outside the planning area.
- **Prescribed Fire** - Prescribed burns will be conducted in any plant community throughout the planning area to meet predefined management objectives set forth in a land or resource management plan. A prescribed burn will be utilized when it is determined that prescribed burning is the best method for achieving those objectives. An approved, site-specific Prescribed Burn Plan will be required for all prescribed burns occurring within the planning area.
- **Wildland Fire Use for Resource Benefit** – WFURB is defined as the management of naturally- ignited wildland fires to accomplish specific, pre-stated resource management objectives, which are set for in predefined geographic areas and have been outlined in an approved Fire Management Plan. A “Go/No-Go” decision making process will be utilized for all unplanned fire events to determine the appropriate management response. The decision to suppress a wildland fire or let it burn to meet resource management objectives will be based on the pre-determined goals and objectives for the FMU in which the wildland fire is burning; the relative risk of the wildland fire to firefighters, staff, visitors, and cultural/natural resources; external constraints, such as air quality or safety concerns; and the overall ability to defend the boundaries of the fire. Wildland fire use, like all fire management operations, will be managed with firefighter and public safety as the primary goal.

The following mitigation measures may be selectively applied to the three FMUs:

Air Quality

- Coordinate with the Air Pollution Control Division of the Colorado Department of Public Health and Environment for all prescribed fires and wildland fire use activities and receive all required permits prior to the start of an activity.
- Follow smoke management reporting and implementation procedures for burning in

Colorado for all prescribed fire and wildland fire use operations as mandated under the Colorado Air Pollution Prevention and Control Act and required by the Colorado Department of Public Health and Environment.

- Monitor air quality adjacent to the project area and in nearby developed areas by monitoring and documenting smoke dispersal, column mixing height, and documenting smoke complaints by visitors and neighbors.
- When conducting slash pile and prescribed burns, attempt to utilize wind directions that carry smoke away from structures and neighbors.
- Keep burn piles free from dirt, as dry as possible, and small enough so smoke impacts can be managed.
- Reevaluate meteorological conditions on the day of the burn to ensure that conditions are favorable for smoke dispersion and air quality standards would not be threatened. If unfavorable conditions are indicated, postpone the burn.
- Keep mechanized equipment in good operation condition so that exhaust emissions are kept to a minimum.
- Notify public of all prescribed fire and wildland fire use activities.

Water Resources

- Do not apply fire retardant within a 300- foot buffer around any waterway.
- Utilize best management practices to reduce the risk of increased sedimentation in streams
- Utilize refueling stations with ground protection for refueling and maintaining chainsaws, vehicles, or other equipment to minimize chances of gasoline or oil spills
- Employ “minimum Impact Suppression Tactics” whenever possible.

Soils

- Utilize natural barriers and wetlines, where feasible, to minimize or prevent erosion of disturbed soil during and after all fire management activities.
- Rehabilitate exposed soils where necessary during fire management activities, including such measures as installing erosion-control devices on steep slopes or covering bare soil to prevent soil movement.
- Specific mitigation measures would be identified during an on-site evaluation, usually by a Burned Area Emergency Rehabilitation (BAER) team.
- Employ “minimum Impacts Suppression Tactics” whenever possible.

Wetlands and Floodplains

- Identify wetlands and floodplains during project planning and limit impacts to these resources to the extent possible by adjusting proposed project boundaries or total avoidance.
- Do not conduct equipment maintenance or fueling in wetlands or riparian areas.
- Do not move slash from upland sites to wetland or riparian areas.
- Avoid using retardant and foam in or near wetlands or riparian areas.
- Employ “Minimum Impact Suppression Tactics” whenever possible.

Vegetation Health and Ecological Integrity

- Consult with natural resource specialist on proposed locations of camps, staging areas, helispots, or other management actions that may remove or disturb native vegetation and/or sensitive species.
- Utilize natural barriers and/or human-made features as control lines to the extent possible.
- Utilize natural disturbance regimes and revegetation to the extent possible to restore native vegetation.
- Utilize fire retardant and low-level aircraft only with approval by the Park Superintendent or by the delegated authority.
- Keep fire lines to a minimum width necessary to allow backfiring or creation of safe blacklines.
- Whenever possible, utilize natural barriers to avoid unnecessary fire line construction.
- Transport crews and equipment on established roads, whenever possible.
- Wherever possible ensure that fire crews park vehicles in specified areas and access project areas within the Park on foot to avoid resource damage.
- If adequate water and pumps area available, use wet lines in lieu of hand line construction.
- Rehabilitate all fire lines, camps, and other disturbances created during fire management activities including stabilizing slopes, and if necessary, re-seed disturbed sites with native vegetation.
- Employ “Minimum Impact Suppression Tactics” whenever possible.

Threatened, endangered, and Candidate Species

- The Great Sand Dunes National Park and Preserve will comply with conservation measures included in the Biological Assessment for the Wildland Fire and Fuels Management Actions on the Baca National Wildlife Refuge and the Greater Sand Dunes National Park and Preserve (9/5/2006), and the subsequent USFWS – Ecological Services letter of concurrence (10/10/2006).

Wildlife and Wildlife Habitat

- Consult with a NPS wildlife biologist on proposed locations of camps, staging areas, helispots, or other management actions that may impact wildlife or important wildlife habitat.
- Conduct all necessary wildlife surveys as determined by NPS wildlife biologist prior to implementing fuel reduction activities to identify important wildlife resources that may need to be protected.
- Implement any fuels projects outside the breeding and nesting season of most wildlife species, to the extent possible.
- Avoid nests to the extent possible during fuels treatment activities.
- Preserve snags and dead fallen trees that can be retained per determined prescription.
- Mark and avoid trees showing signs of active wildlife use, to the extent possible.
- Maintain pinecone caches used by small mammals during fuels treatment activities, to the extent possible.

Non-native, Invasive Species

- Monitor for non-native, invasive plants within fire management areas prior to and following treatments.
- Incorporate measures that reduce the likelihood of non-native invasive introduction and spread in all fire management planning efforts.
- Control or eradicate non-native, invasive species that invade following fire management

activities.

- Utilize certified weed seed free straw during rehabilitation.

Cultural Resources

- Conduct project-specific section 106 review and consultation with SHPO, conducted by person(s) meeting the Secretary of the Interior Standards.
- A Resource Advisor (READ) who meets the secretary of the Interior Standards for cultural resources will be assigned to wildland fire use actions, prescribed burns, manual/mechanical fuel reduction projects, wildland fire suppression actions, and BAER; as needed.
- Utilize protective tactics which may include foaming or wetting the resource, wrapping with fire-shelter fabric, installing a temporary sprinkler system, and black-lining around the resource.
- Locate and isolate historic properties that are vulnerable to fire, suppression, or manual/mechanical activities for protection during project implementation.
- Identify and protect/restore contributing elements of cultural landscapes prior to implementation of project work.
- Identify and protect ethnographic resources in coordination with Native American tribes.
- Brief work crews about the need to protect any cultural resources encountered, and instruct them regarding the illegality of collecting artifacts on federal and private land.
- Remove heavy fuels which cause long-duration heating on and around cultural resources, where appropriate.
- Confine vehicle traffic to existing roadways, when possible.
- Avoid aerial application of water or retardant to structures and structural remains.
- Dispose of slash away from cultural resources.
- Route fire control lines around cultural resources during suppression actions, when possible.

Wilderness

- Apply the “minimum requirement” concept and “minimum tool” and “primitive tool” procedures, as specified in the Wilderness Act, NPS Management Policies, NPS Reference Manual #41, and “minimum Requirement Decision Guide, for all fire management activities within designated and recommended wilderness areas.
- Conduct initial attack actions within designated or recommended wilderness areas using “minimum impact suppression tactics”.
- Do not utilize heavy equipment, pumps, chainsaws, or off-road vehicles within wilderness areas without the approval of the Park Superintendent.

Socioeconomics, Public Health and Safety, and Recreational Opportunity and Visitation

- Consider safety of the public, personnel, and fire crews as the highest priority for all fire management activities.
- Consider impacts to socioeconomics and recreational opportunities and visitation of all fire management activities including the impacts to local and regional businesses and

economy.

- Ensure all fire personnel have had proper training prior to being assigned to a fire management project.
- Do not initiate fire management operations until all personnel involved receive a safety briefing.
- Equip fire personnel with appropriate personal protection equipment for their incident assignment.
- Notify Park, Refuge, and Ranch neighbors and visitors and local residents and businesses of all planned and unplanned fire management activities. Notify the public about treatment activities through procedures identified in the project-specific work plans.
- Develop an interpretation and education plan to be implemented by FWS, NPS, and TNC for all fire management activities.
- Limit the removal of vegetation within prominent viewsheds to the extent possible.

Wildland – Urban Interface

- Work with neighboring land owners to minimize risks within the wildland-urban interface.
- Apply fire wise standards within the wildland –urban interface.
- Notify Park, Refuge, and Ranch neighbors of all planned and unplanned fire management activities that have the potential to impact them.

ALTERNATIVES CONSIDERED BUT NOT SELECTED

Alternative 1: No Action Alternative. The No Action Alternative includes preparing a Fire Management Plan that would direct each agency to suppress all wildland fires regardless of ignition source throughout the entire planning area. This alternative would not permit any active fuels management projects, including prescribed fire or manual and mechanical treatments, or wildland fire use for the protection and benefit of resources. The goal of this alternative would be to safely and efficiently suppress all wildland fires throughout the planning area in conformance with existing policies and procedures.

Alternative 2: Fire Suppression Plus Fuels Management Alternative. The Fire Suppression Plus Fuels Management Alternative was based on the “natural fire regimes” and/or “desired future conditions” of ecological systems within the planning area, as well as local collaborative process for ensuring community protection needs and firefighter and public safety. This alternative allowed fuels management activities, including manual and mechanical treatments and prescribed burns, to occur within appropriate limits of the planning area. Wildland fire use for resource benefits, however, would not be allowed under this alternative. All wildland fire would be suppressed regardless of ignition source and location of the wildland fire.

ENVIRONMENTALLY PREFERRED ALTERNATIVE

The environmentally preferred alternative is determined by applying the criteria suggested in the National Environmental Policy Act of 1969 (NEPA), which is guided by the Council on

Environmental Quality (CEQ). The CEQ provides direction that “the environmentally preferable alternative is the alternative that will promote the national environmental policy as expressed in NEPA Section 101:

- 1 - fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- 2 - assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- 3 - attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- 4 - preserve important historic, cultural and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- 5 - achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- 6 - enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

Environmentally preferred is defined as “the alternative that will promote the national environmental policy as expressed in the National Environmental Policy Act's section 101. Ordinarily, this means the alternative that causes the least damage to the biological and physical environment; it also means the alternative which best protects, preserves, and enhances historic, cultural, and natural resources” (CEQ 1978).

Alternative 1 represents the no action or current fire management direction for the three properties. This alternative would set a policy of suppression of all wildfires with no fuels management on all properties covered in the interagency FMP. Because Alternative 1 does not provide for protection against uncharacteristically intense wildfire, the protection and preservation of fire-adapted ecological systems, or the protection of cultural resources, provisions 1, 2, 3, 4, or 6 of the national environmental policy goals would not be fully realized. Although Alternative 1 would provide a large degree of protection to cultural and natural resources in the short-term, this alternative would not result in the same continued level of protection over time.

Alternative 2 includes suppression of wildland fires and the management of fuel loads with manual and mechanical treatments and prescribed fire. This alternative realizes the full range of national environmental policy goals as stated in Section 101 of the National Environmental Policy Act for a majority of the site. However, it does not allow for wildland fire use, and therefore, falls short of helping to preserve the natural resources within the planning area

(provisions 1, 3, 4, and 6). Some areas might become degraded over time through continued fire suppression. In addition, some areas with sensitive resources might be at greater risk from uncharacteristically intense wildfire. The end result, therefore, would be that protection of cultural, human, and natural resources in the long-term may not be realized.

The environmentally preferable alternative is Alternative 3 because it surpasses Alternatives 1 and 2 in realizing the full range of national environmental policy goals as stated in Section 101 of the National Environmental Policy Act. Alternative 3 provides a high level of protection to natural and cultural resources for the long-term; maintains an environment that supports diversity and variety of individual choice; and integrates resource protection with an appropriate range of visitor uses. It fulfills the responsibility of each generation to protect the environment for future generations (provision 1) and the actions included in Alternative 3 help to better assure safe and productive surroundings (provision 2) and the quality of renewable resources (provision 6).

WHY THE PREFERRED ALTERNATIVE WILL NOT HAVE A SIGNIFICANT EFFECT ON THE HUMAN ENVIRONMENT

As defined in 40 Code of Federal Regulations (CFR) §1508.27, significance is determined by examining the following criteria:

Impacts that may be both beneficial and adverse:

Implementation of the preferred alternative, Alternative 3, will not result in significant adverse or beneficial effects. Potential beneficial and adverse negligible to minor effects are to Wildlife and Wildlife Habitat, Socioeconomics, Public Health and Safety, and Recreational Opportunities and Visitation. Beneficial effects would result from implementation of AMR, fuels management projects (including prescribed fire), and long-term benefits from WFURB. Potential beneficial and adverse minor effects are to Wetlands and Floodplains; beneficial impacts will be from AMR, fuels management (including prescribed fire), and WFURB. Potential beneficial and adverse minor to moderate effects are to Soils, Vegetation Health and Ecological System Integrity, Cultural Resources, and Wilderness. Beneficial effects will be from AMR, fuels management (including prescribed fire), and WFURB.

Adverse effects to the resources are expected to be short-term in duration; adverse effects to Cultural Resources and Soils are additionally expected to be short- to long-term in duration. Direct and indirect and short- to long-term beneficial effects are expected for all of the above-listed impact topics.

Degree of effect on public health or safety:

The preferred alternative would reduce risks to wildland firefighters and visitors by allowing use of an appropriate management response to wildland fires. This response may include selecting control lines along natural or man-made barriers which reduces the exposure of firefighters in unburned fuels adjacent to a fire perimeter. Direct and indirect effects to firefighters would be mitigated by application of the Ten Standard Firefighting Orders, LCES (acronym for “Lookouts, Communications, Escape routes, Safety zones”) and other risk mitigation actions. Temporary closures would be used to reduce exposure to park visitors and neighbors. The risks

associated with prescribed burning would be further mitigated by ensuring the burns are conducted within the approved prescription. Mechanical hazard fuel reduction activities would employ standard safety equipment and protocols. Wildland Fire Use for Resources Benefits will ultimately have beneficial effects due to reducing fuels and establishing a mosaic pattern of vegetation, thus affecting wildland fire patterns.

In addition to the Public Health and Safety, Air Quality was also analyzed in the EA. With mitigation measures in place, the effects on Public Health and Safety and Air Quality will be short-term, localized, and negligible to moderate. Beneficial effects will be long-term.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetlands, wild and scenic rivers, or ecologically critical areas:

Based on the analysis in the environmental assessment/assessment of effect, no major effects to park resources would occur. Ephemeral wetlands occur within the project area. Mitigation measures will reduce adverse effects to negligible to minor and short-term; wetlands are expected to experience beneficial effects from fuel treatments and WFU. Historic and cultural resources occur in the project area. Mitigation measures will reduce adverse effects to negligible to minor; beneficial effects will be minor to moderate and will result from fuel reduction projects and WFU. No prime farmlands, wild and scenic rivers, or ecologically critical areas occur within the project area.

Degree to which effects on the quality of the human environment are likely to be highly controversial:

The proposed action was found to not be highly controversial during public scoping or public comment period of the EA. Five comments were received during the public comment period of the EA; two adjacent or nearby organizations (Manitou Foundation, Baca Grande Volunteer Fire Department) want to be included in future fire management projects. The Colorado State Historic Preservation Officer (SHPO) supports the preferred alternative, and will be consulted for Section 106 of the National Historic Preservation Act (NHPA) on a project-specific basis. The Southern Ute Indian Tribe also supports the preferred alternative, and would like to be contacted in the event of inadvertent discoveries of cultural resources. The third comment from a private citizen would like to see a new FMU out of part of the Baca-Dunes FMU. The new FMU would allow WFU.

Degree to which the possible effects on the quality of the human environment are highly uncertain or involve unique or unknown risks:

While wildland fire has some associated risk, the proposed action will not have effects that are highly uncertain, or of unique or unknown risk on the quality of the human environment. None of the Internal and external scoping, and public comment for the EA identified such risks.

Degree to which the action may establish a precedent for future actions with significant effects or represents a decision in principle about a future consideration:

The proposed action neither establishes a precedent for future actions with significant effects nor represents a decision in principle about a future consideration.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts:

The proposed action will not result in significant cumulative impact when added to other past, present, or reasonably foreseeable future actions. These findings are documented in the environmental assessment/assessment of effect.

Degree to which the action may adversely affect districts, sites, highways, structures, or objects listed on the National Register of Historic Places or may cause loss of destruction of significant scientific, cultural, or historic resources:

The direct adverse impacts of the preferred alternative on cultural resources would be localized, short to long term, and negligible to minor. Beneficial effects will be long-term and minor to moderate. Fuels treatments including prescribed fire and WFU will benefit cultural resources in the long-term due to reducing large, severe, uncontrollable fires damaging cultural resources. Some cultural landscapes and ethnographic resources may also be benefited by fire.

Compliance with Section 106 of the National Historic Preservation Act was initiated with the Colorado State Historic Preservation Officer (SHPO). In a letter dated May 2, 2005, the Colorado SHPO concurred with the park that the preferred alternative (Alternative 3) will have no adverse effect to historic properties. The Great Sand Dunes National Park and Preserve will complete the Section 106 compliance process on a project by project basis.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat:

Impacts of prescribed and/or WFU fires and fuel reduction efforts on endangered and threatened species were extensively analyzed in the Biological Assessment (BA) completed in September 2006. Species considered include bald eagle, Mexican spotted owl, Southwestern willow flycatcher, yellow-billed cuckoo, and the Canada lynx. The BA was sent to the U.S. Fish and Wildlife Service – Ecological Services; the BA includes all conservation measures to be applied.

Compliance with Section 7 of the Endangered Species Act was completed when the park received a letter from the U.S. Fish and Wildlife Service – Ecological Services on October 10, 2006. The letter included concurrence with the NPS determination that implementation of the proposed plan may affect, but is not likely to adversely affect the southwestern willow flycatcher, bald eagle, Mexican spotted owl, yellow-billed cuckoo, and the Canada lynx.

Whether the action threatens a violation of Federal, State, or local environmental protection laws:

The proposed action violates no Federal, State, or local environmental protection laws.

Impairment:

In addition to reviewing the list of significance criteria, the National Park Service determined that implementation of the preferred alternative will not constitute an impairment of resources and values at Great Sand Dunes National Park and Preserve. This conclusion is based on a thorough analysis of the impacts described in the environmental assessment/assessment of

effect, the agency comments received, and the professional judgment of the decision-maker in accordance with the National Park Service's *Management Policies, 2001*. As described in the environmental assessment/assessment of effect, implementation of the preferred alternative will not result in major, adverse impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the establishing proclamation of Capulin Mountain National Monument; (2) key to the natural or cultural integrity of the monument or to opportunities for enjoyment of the park; or (3) identified as a goal in the park's general management plan or other relevant National Park Service planning documents.

PUBLIC INVOLVEMENT

The environmental assessment/assessment of effect was made available for public review and comment during a 30-day period from April 25 to May 24, 2005. A total of five responses were received, including letters from four government and non-government organizations, and one private citizen comment letter.

Three commentors supported the proposed action. Two commentors expressed strong interest in coordinating with the Great Sand Dunes National Park. Two commentors requested to be notified at the implantation of prescribed burns and/or discovery of previously unknown resources. One commentor proposed developing a new FMU within the current Baca-Dunes FMU in order to allow WFU in the new FMU. The EA interdisciplinary team considered WFU in all or parts of the Baca-Dunes WFU. Because this FMU has a number of cultural resources, occurs closer to the wildland-urban interface, and poses a number of safety concerns, the interdisciplinary team could not adopt WFURB in this FMU at this time. Logistical constraints including limited numbers of fire personnel, and ability to isolate resources at risk from the WFURB activity, the park will not adopt WFURB in the Baca-Dunes FMU at this time. Therefore, it is not necessary to re-write and re-release the environmental assessment in response to public comment.

CONCLUSION

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement (EIS). The preferred alternative will not have a significant effect on the human environment. Negative environmental impacts that will occur will be minor in intensity. There are no significant adverse or beneficial impacts on public health, public safety, threatened or endangered species, historic properties either listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law.

Based on the foregoing, it has been determined that an EIS is not required for this project and thus will not be prepared.

Approved:

/s/ Michael D. Snyder

Michael D. Snyder, Regional Director
National Park Service, Intermountain Region

11/13/2006

Date