



National Park Service
U.S. Department of the Interior

Western Arctic National Parklands
WEAR

Alaska



Finding of No Significant Impact

Fire Management Plan Environmental Assessment

September 2004

Recommended: Julie O. Hopkins
Superintendent, Cape Krusenstern
National Monument, Kobuk Valley
National Park, Noatak National
Preserve, Bering Land Bridge National
Preserve

9-29-04
Date

Approved: Marcia Blaszyk
Regional Director, Alaska

9/30/04
Date

Finding of No Significant Impact
Environmental Assessment
Fire Management Plan
Western Arctic National Parklands

The National Park Service (NPS) has prepared an environmental assessment (EA) that evaluates potential impacts to cultural and natural resources associated with implementation of the fire management plan for Western Arctic Parklands (WEAR). WEAR includes the following conservation units: Bering Land Bridge National Preserve, Cape Krusenstern National Monument, Kobuk Valley National Park, and Noatak National Preserve.

The NPS proposes implementing NPS Director's Order 18 (DO-18) by establishing a fire management plan for WEAR. This fire management plan is a comprehensive document that outlines WEAR fire management goals and describes the policies and actions by which these goals will be realized. The plan will formalize park-specific responsibilities for implementing the Alaska Interagency Wildland Fire Management Plan (AIWFMP) and will formalize park-specific fire management decision making process and procedures, redefines fire management strategies, articulates the park's fire management organization and responsibilities, and establishes the direct linkage between the resource management goals and fire management strategies.

The Fire Management Plan is necessary to comply with DO-18, and codifies the way fire will be managed within WEAR. Although fire protection needs may arise and remain our first priority, managers need to consider that fire has long been an integral component of the area's ecosystems and is critical for the maintenance of virtually all indigenous conditions, from plant and animal populations to soil and permafrost layers. Accordingly, the scope of the preferred alternative and other considered alternative entail the planning and implementation of policies and practices flexible enough to allow the simultaneous pursuit of protection and resource management goals.

The NPS has selected Alternative 2 (Combination of Prescribed Fire Use, Wildland Fire Use, and Wildland Fire Suppression), which is the NPS preferred alternative.

Attachment A at the end of this document provides clarification, modification, or additional information added to the Fire Management Plan and EA.

ALTERNATIVES

The EA presents two alternatives for the application and use of wildland fire as a management tool for resource benefits. All alternatives would entail continued compliance with the AIWFMP, while at the same time bringing the Park/Preserve's fire management program into compliance with recently developed National Park Service directives. NPS Director's Order 18 mandates a distinction between prescribed fire, defined as any fire planned and implemented by management, and wildland fire, defined as any unplanned ignition, whether human or natural. Wildland fire incidents, in turn, fall into two categories: (1) Wildland Fire Use entails the management of certain unplanned ignitions for the achievement of management goals, including the reduction of dangerous and unnatural accumulations of burnable vegetation and the

preservation of fire in its natural role; (2) Wildland Fire Suppression entails a broad spectrum of actions aimed at protecting life, property, and sensitive resources while also ensuring firefighter safety, cost effectiveness, and minor disturbance from suppression activities.

Alternative 1: Wildland Fire Suppression. Natural ignitions occurring in certain areas and under predetermined conditions would be managed for the accomplishment of resource management goals, including the preservation of fire in its natural role and the reduction of hazardous accumulations of burnable vegetation. Any fire posing a threat to life or property would be immediately suppressed. The suppression response is described in the Alaska Interagency Wildland Fire Management Plan. Prescribed fires would not be implemented.

Alternative 2: Combination of Prescribed Fire Use, Wildland Fire Use, and Wildland Fire Suppression (NPS Preferred Alternative and No-Action Alternative). All three of the major management actions (Wildland Fire Suppression, Wildland Fire Use and Prescribed Fire) described under DO-18 would be allowed, as determined by a combination of pre-established and incident-specific decision making criteria. This alternative represents no change in the on-the-ground implementation of fire management activities; however, it does define the strategy for Wildland Fire Use. Wildland fires that do not pose a threat to life, property, or significant resources would be managed for the accomplishment of resource management goals, including the preservation of fire in its natural role and the reduction of hazardous accumulations of burnable vegetation. Prescribed fire would be implemented, in certain cases, under the direction of National Park Service personnel for the purpose of reducing hazardous fuel loads. Suppression would continue in or near developed areas and near WEAR boundaries when neighboring administrative units with different fire management objectives adjoin NPS land. In areas known to contain fire sensitive cultural and/or archeological resources that warrant protection, or whenever insufficient resources are available to ensure the effective, long-term management of wildland fire to meet resource management objectives, suppression action would continue.

Minimum impact fire suppression tactics as allowed by NPS fire management policy would be used. All non-emergency actions taken within wilderness areas would be subject to Minimum Requirement/Minimum Tool Analysis. Potential impacts would also be mitigated by actions of the Multi-Agency Coordinating (MAC) group. The MAC group will convene as necessary to implement temporary changes of selected fire management options. Such changes would be implemented for specific geographic areas during periods of unusual fire conditions such as numerous fires, predicted drying trends, smoke problems, excessively wet conditions, or shortages of suppression resources.

PUBLIC INVOLVEMENT

The 30-day public review period commenced on August 27, 2004 and closed on September 27, 2004. The Fire Management Plan/EA was mailed to 40 government agencies, interest groups, and individuals. The NPS received comments from the State of Alaska, and the Bureau of Land Management (BLM). The State of Alaska indicated that the plan was consistent with the Alaska Interagency Wildland Fire Management Plan. The BLM provided technical modifications to the plan that did not change the environmental assessment. The changes are indicated in the attached Errata (Attachment A).

DECISION

The NPS decision is to select Alternative 2, the preferred alternative. With the implementation of the NPS preferred alternative, fire management within WEAR will remain status quo.

Rationale for the Decision

The NPS preferred alternative will enable the NPS to plan for and effectively manage the complex natural phenomena of wildland fire at Western Arctic National Parklands. Natural fire will be allowed to continue and will continue as an integral part of the wilderness experience. Alternative 2 will provide the full spectrum of fire management strategies and practices to accomplish WEAR fire and resource management objectives while protecting human life and identified resources/values. The potential use of prescribed fire will permit managers to reduce the risk of catastrophic fires around important cultural resource sites as well as limiting the severity of fire in natural resource areas such as floodplain forests. Implementation of Wildland Fire Use in remote portions of the Park/Monument/Preserve will ensure the cost-effective preservation of the area's natural fire environment as well as the reduction of potentially dangerous fuel loads. This will enable the NPS to implement a fire management plan in accordance with NPS Directors Order 18. Alternative 2 is also the environmentally preferred alternative.

Significant Criteria

As defined in 40 CFR Section 1508.27, the selected alternative will not have a significant effect on the human environment. This conclusion is based on the following examination of the context of the selected alternative and its impacts, as well as the intensity or severity of the impacts.

Impacts that may be both beneficial and adverse. The natural function of the ecosystems within WEAR will not be disturbed, therefore maintaining vegetation, wildlife habitat and subsistence use within the Park/Preserve. There will be a minor short-term impacts resulting from a displacement of wildlife in the burned area. This, however, will replicate a naturally functioning ecosystem and subsistence regime. Additional impacts may result from suppression actions; however, limited acreage of critical and full protection designation minimizes suppression needs.

Fire is a common occurrence in portions of this ecosystem and does result in some erosion, affecting water quality and fisheries habitat. The amount of erosion is expected to continue at the same natural level.

Degree of effect on public health or safety. Impacts will include the occasional closure of specific areas due to fire activity or smoke concentrations for the safety of visitors resulting in an inconvenience for the visitors or cause them to alter their plans. Smoke will for short-time periods degrade visibility which also may inconvenience visitors or cause them to alter their plans.

Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmland, wetlands or floodplains, wild and scenic rivers, or ecologically critical areas. There will be a minor impact to flood plains and wetlands if fire

suppression operations occur (handline construction). There may be impacts due to erosion after fire has burned through a wetlands or floodplain. Once vegetation in these areas re-establishes erosion is expected to return to normal levels.

Long-term impacts to wilderness resource values are not expected. Short-term impacts during fire suppression activities may occur but will be mitigated by adhering to special concerns outlined in the WEAR FMP and by the use of minimum tool/minimum requirement analysis.

Degree to which effects on the quality of the human environment are likely to be highly controversial. The successful implementation of the NPS preferred alternative which uses a combination of prescribed fire use, wildland fire use, and wildland fire suppression is not likely to be highly controversial.

The degree to which the potential impacts are highly uncertain or involve unique or unknown risks. The impacts of the selected alternative are not highly uncertain or involve unknown risks.

Degree to which the action may establish a precedent of future actions with significant effects or represent a decision in principle about a future consideration. The selected alternative will not set a precedent for future actions. Fire management within WEAR will remain at status quo.

Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. The on-going and future activity that will have a cumulative effect on resources of concern within and outside of the WEAR boundaries analyzed in this EA is the adjacent landowners' fire management plans. All public land management agencies in Alaska are signatories of the Alaska Interagency Fire Management Plan, which allows for fire to burn on the landscape in limited suppression units. Much of the public lands surrounding the Park and Preserve is in a limited suppression unit and may result in multiple large fires. The results of these multiple fires may be greater than fires managed just within the WEAR boundary.

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 or destruction of significant scientific, cultural, or historical resources. There will be improved long-term protection of cultural resources with the use of fire near and surrounding cultural resources. The occasional use of prescribed fire will allow a relatively cost-effective means of reducing fuel loads and preserving historic landscapes and conditions where the presence of values to be protected prohibits the implementation of Wildland Fire Use.

Degree to which the action may adversely affect an endangered or threatened species or its critical habitat. Two species of Eider, *Somateria fischeri* (Spectacled eider), and *Polysticta stelleri* (Steller's eider) are currently listed as threatened on the Federal Threatened and Endangered Species list. Although not scientifically documented in any of the WEAR management units, the coastline of both Bering Land Bridge and Cape Krusenstern lay within the historic breeding range for these species. Eiders are Sea ducks that live primarily in ocean waters. During breeding however they use inland waters where they nest on tundra near small ponds. Fire likely has little effect on these species and the USFWS have little concern of direct impacts of fire suppression activities on the species.

Whether the action threatens a violation of federal, state, or local environmental protection laws.
The selected alternative will not violate any federal, state, or local environmental protection laws.

FINDING

As documented in the EA, the NPS has determined that the preferred alternative can be implemented with no significant adverse effect to natural and cultural resources. The levels of impacts to park resources anticipated from the preferred alternative will not result in an impairment of resources that fulfill specific purposes identified in the establishing legislation or that are key to the natural or cultural integrity of the park and preserve.

The preferred alternative complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 and 11990. There will be no significant restriction of subsistence activities as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 801(a) Summary Evaluation and Findings.

I find that the preferred alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council of Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared for the project.

Attachment A. ERRATA

This errata section provides clarification or modification to the Fire Management Plan for Western Arctic National Parklands. The amendments do not significantly change the analysis of the EA and, therefore a new or revised EA is not needed and will not be produced.

1. Throughout the document “suppression agency FMO” was replaced by “suppression organization FMO.”

2. Under Management Constraints on pages 13, 15, 16, 17 the third bullet has been expanded and rewritten to read:

- Retardant will not be used without the approval of the Superintendent (or delegate), except when fire imminently threatens life or values to be protected. Any use of retardant will comply with standards identified in the Interagency Standard for Fire and Fire Aviation Operations (published annually).
- Heavy equipment (including bulldozers) will not be used without the approval of the Superintendent (or delegate), except in life-threatening situations.

3. Page 3, 4th bullet: inserted ...surveillance “and fire effects monitoring” Also added: “All surveillance activities will be coordinated with suppression organizations.”

4. Page 3, 5th bullet: inserted ... personnel “, in coordination with suppression organization.”

5. Page 3, 6th bullet: inserted ...personnel “, in coordination with suppression organization,”

6. Page 7, section E, first paragraph, inserted after first sentence: Department of Interior Manual (620) delineates BLM authority for providing suppression services on Department of Interior and Native lands and provides for reciprocal fire protection agreements. A reciprocal fire protection agreement exists between BLM and the State of Alaska, Department of Natural Resources. Regardless of land ownership, BLM-AFS has suppression responsibilities for the northern half of Alaska, and the State has suppression responsibility in the south-central, most of southwestern Alaska and portions of the central interior. The US Forest Service provides suppression services on a portion of the Kenai Peninsula and in southeastern Alaska.

7. Page 7, section E. third paragraph: inserted ...initial attack “, in coordination with suppression organization,”

8. Page 7, section E. fourth paragraph, second sentence was rewritten to read: “In 1998, under the Alaska Wildland Fire Coordinating Group, the common elements of the area-specific fire management plans were incorporated into a single reference document: the Alaska Interagency Wildland Fire Management Plan.”

9. Page 7, section E, fourth paragraph, third sentence, inserted ... original “area-specific” plans...

10. Page 10, table 1: Minimum Impact Suppression Tactic spelled out.

11. Page 12, second paragraph, first sentence was rewritten to read: “A statewide Multi-Agency Coordination (MAC) group will be convened when the Alaska Preparedness Level reaches Level 4 to establish priorities for suppression resource allocation and to determine if the need exists for a temporary change in the selected fire management option identified in the AIWFMP for a specific geographic area(s).”

12. Page 15, section b, fifth sentence was rewritten to read: “The decision to implement Wildland Fire Use will be documented through the WFIP Stage I, which includes the Decision Criteria Record.”

13. Page 17, section b, seventh sentence and page 18, section b, third sentence replaced “Decision Criteria Record” with “WFIP Stage 1.”

14. Page 19, item 1, fourth paragraph, second sentence, deleted “on a large scale”

15. Page 19, item 1, fourth paragraph, sixth sentence was rewritten to read: “Yet despite this reduction, large, high-intensity fires remain a frequent occurrence, in part because the detection of interior fires remains difficult especially during periods of high fire activity and smoke concentration.”

16. Page 27, section A, part 1, sixth sentence was rewritten to read: “Consequently, the detection of natural ignitions within this FMU may trigger Wildland Fire Use unless the Agency Administrator specifies otherwise.”

17. Page 28, item 4, fourth sentence was rewritten to read: “Implementation of Wildland Fire Use actions will be initiated through the preparation of the WFIP Stage 1 including the Decision Criteria Record in consultation with the Western Area FMO and AFS Tanana Zone and/or, DOF Fairbanks/Mat-Su/Southwest Area FMO.”

18. Page 33, second paragraph deleted due to policy change.

19. Page 44. Table 10, Superintendent Specific Responsibilities line 1, inserted, ...Authority and “in conjunction with the suppression organization FMO”

20. Page 45, Table 10, Division Chiefs and Supervisors - Fire Management Role, section reformatted and rewritten to read: “The Division Chiefs, Program Managers and Supervisors provide their assistance and assistance of qualified employees as needed in the event of a large fire incident in DENA or adjacent areas. This may include serving as resource advisors (natural, cultural, subsistence, etc). They also need to recognize and assist with national and regional fire response efforts when circumstance dictate and provide assistance with the preparing fire

management related environmental compliance documents. These leaders also provide support to employees interested in maintaining or obtaining fire management qualifications.”

21. Page 50, section F. the only sentence was rewritten to read: “An Interagency Fire Protection Agreement is in effect between the National Park Service, Alaska Region and BLM Alaska Fire Service to delineate purpose, authorities and responsibilities of both entities related to wildland fire suppression.”

22. Page 53, item 3. third sentence, inserted ...Aviation “(DNR)”

23. Page 54. item 4. added to the end of paragraph: “Any fire related evacuation effort will be coordinated with the suppression organization FMO or Incident Commander.”

24. Page 54. Section X. fourth bullet, added to the end of bullet text: “If an Incident Management Team is deployed to manage a fire that affects WEAR, NPS information personnel will interact with and support the team’s Public Information Officer.

25. In Tables 5 and 6 “Agency Administrator” was expanded to “Agency Administrator and Suppression Organization FMO.”

26. Table 4 Responsibility for Initial WFIP Components at WEAR was modified to:

FMU	Management Response (* = pre-planned response)	Required Component	Completion Timeframe	Responsible Party
Full Protection	Suppression*	Recording of detection & Determination of FMU	ASAP	Suppression Organization FMO
	Fire Use for Resource Benefit	WFIP Stage 1	2 hours after detection	Suppression Organization FMO & Agency Administrator
Modified Protection	Suppression *pre-planned prior to conversion date	Recording of detection & Determination of FMU	ASAP	Suppression Organization FMO
	Fire Use for Resource Benefit	WFIP Stage 1	2 hours after detection	Suppression Organization FMO & Agency Administrator
Limited Protection	Suppression (human ignition)	Recording of detection & Determination of FMU	ASAP	Suppression Organization FMO
	Fire Use for Resource Benefit *	WFIP Stage 1	2 hours after detection	Suppression Organization FMO & Agency Administrator