

U. S. DEPARTMENT OF THE INTERIOR**National Park Service****Final Environmental Impact Statement / Fire Management Plan****Golden Gate National Recreation Area****Marin, San Francisco and San Mateo Counties, California*****RECORD OF DECISION***

The Department of Interior, National Park Service has prepared this Record of Decision on the *Fire Management Plan/Final Environmental Impact Statement* (FMP FEIS) for Golden Gate National Recreation Area (GGNRA), Muir Woods National Monument, and Fort Point National Historic Site (collectively known as “the park” for purposes of this document). This document includes a description of the background for the project, a statement of the decision made, synopses of other alternatives considered, a description of the environmentally preferable alternative, the basis for the decision, findings on impairment of park resources and values, an appendix detailing measures to minimize environmental harm, and an overview of public involvement and agency consultation in the decision-making process.

Background of the Project

The legislated boundary of GGNRA consists of 74,816 acres in San Mateo, San Francisco, and Marin counties in California within which 15,700 acres are directly managed by GGNRA and comprise the planning area for the FMP FEIS. The planning area does not include the northern lands of GGNRA (approximately 18,000 acres) which are managed by Point Reyes National Seashore, or lands within the jurisdictional boundary of GGNRA that are not directly managed by the NPS.

The National Park Service (NPS) managed lands of GGNRA contain more than 1.7 million square feet of building space in both historic and non-historic structures. The park has roughly 59 miles of Pacific coast and San Francisco Bay shoreline and an estimated 40-mile long interface with developed lands, primarily residential communities. The parklands, part of the Golden Gate Biosphere Reserve, support 19 separate ecosystems and 12 distinct plant communities which together provide habitat for 25 federally-listed endangered or threatened plant and animal species and 52 additional species of concern. Within GGNRA are five National Historic Landmark Districts, 667 historic structures, and more than 350 known archeological sites. Each year, more than 16 million visitors come to the park from all over the world.

Fire management is an essential component of NPS operations and the GGNRA has been operating under a 1993 Fire Management Plan (FMP). Concerns about fire management in GGNRA are due to the fire hazards created from fuel buildup within parklands as a result of fire suppression efforts over the past century, the extension of residential development along much of the park boundary, and the spread of more flammable, non-native invasive plants within park lands, particularly along the boundary.

This revision of the GGNRA FMP was initiated in August 2003 in response to recent changes to NPS and federal fire management policies and the need to update the existing plan. The 1993 FMP focused primarily on fire ecology and natural resource management issues. The Federal Wildland Fire Management Policy (1995, 2000) reflects lessons learned from a catastrophic fire season in 2000.

Updated policies stress the need for land managers to reintroduce the role of fire into fire adaptive natural

systems, to use fire management principals to protect sensitive park resources, and to reduce fire risk along the wildland urban interface through the implementation of cooperative fuel reduction strategies with neighboring communities and agencies.

The purpose of this FMP FEIS is to provide a framework for fire management activities in a manner that helps achieve resource management objectives consistent with the park's cultural and natural resources, and land management plans; reduces risks to developed facilities and adjacent communities; and addresses safety considerations for park visitors, employees, and resources. The specific purposes of this FMP FEIS are:

- To prepare a new FMP that is consistent with Federal Wildland Fire Management Policy and conforms to agency guidelines for fire management plans and programs; and
- To help achieve resource management objectives consistent with the park's cultural, natural resource, and land management plans and be responsive to safety considerations for park visitors, employees, and resources.

A set of goals were developed by NPS staff during this FMP EIS planning process. The goals were derived from federal wildland fire management policy, NPS management policies, the 1980 GGNRA General Management Plan (GMP), and comments and concerns expressed by the public and agencies during the scoping period. Management objectives, detailed in section 1.4 Purpose and Need for Action of the FMP FEIS, were developed for each goal and describe what must be accomplished in order for the fire management program to be considered successful. The goals were then used in the formulation of the alternatives analyzed in the FEIS.

In addition to the FMP goals, the planning area's topography, hydrology, the results of fire hazard modeling, analysis of current development patterns, and the locations and types of significant park resources served to inform NPS staff as they developed Fire Management Units (FMU's) for the FMP. The FMU's were then used as a means to evaluate and analyze management alternatives. An FMU is any land management area that can be defined by management goals and constraints, topographic features, access corridors, values at risk or values to be protected, political boundaries, fuel types, or major fire regime groups that set it apart from management characteristics of an adjacent unit.

The 1993 FMP FMU's were based upon vegetation communities and are used in the current FMP FEIS in *Alternative A – 1993 FMP, No Action*. The FMU's used in the action alternatives (Alternative B and Alternative C) were based upon different inputs to conform to current federal wildland fire management policy. The new FMU's consist of the Wildland Urban Interface FMU for areas of the park adjacent to relatively dense suburban neighborhoods; the Park Interior FMU comprised of open, largely undisturbed lands that are relatively remote from developed areas whether on the park perimeter or interior; and the Muir Woods FMU for Muir Woods National Monument, reflecting the important natural resources combined with high visitor use in this special park unit.

Three alternatives are analyzed in the FMP FEIS. The alternatives meet the park's goals and objectives to an acceptably large degree, and are within constraints imposed by regulations and policies, by risks associated with the wildland urban interface, and by technical and funding limitations. The three alternatives involve different combinations of prescribed burning and mechanical treatments for achieving fire risk reduction and resource protection and rehabilitation objectives. In each alternative, an upper limit

has been set on the number of acres that would be treated in any one year. Then, the alternatives are differentiated by the annual maximum acreages allowed for each treatment type (mechanical treatment or prescribed burning) within the FMU's in the three counties. The variations in annual, permissible acreages are one means of distinguishing differences among the alternatives. Potential impacts and appropriate mitigation measures are assessed for each of the alternatives.

Decision (Selected Action)

The selected action, *Alternative C - Hazard Reduction and Resource Enhancement through Multiple Treatments*, is the preferred alternative from the FMP FEIS. Alternative C will allow for the greatest number of acres to be treated annually to achieve fire management and resource objectives through the use of a broad range of fire management strategies. As documented in the FEIS, Alternative C is also deemed to be the "Environmentally Preferred" Alternative.

Given favorable weather conditions and adequate project funding, Alternative C would permit up to 595 acres be treated per year using mechanical treatments and prescribed fire. If project funding is not optimum, the park would seek other funding from other divisions such as maintenance and natural resources for projects that would result in benefit meeting the objectives of those divisions as well as fire management. Approved projects that lack funding would roll over to the next fiscal year. Low funding for prescribed burning projects can be supplemented in Marin County by sharing staff and equipment resources with other fire and land management agencies. The acreage limit for annual treatments of 275 acres by mechanical treatment and 320 acres of prescribed burning were developed as reasonable targets that could be achieved annually rather than absolutes that must be achieved. The plan acknowledges that the level of funding available for fire management projects has varied from year to year; in addition, heavy fogs in late summer/early fall can shift the park's focus to achieving the mechanical treatment acreages and away from prescribed burning.

Under Alternative C, mechanical treatment and prescribed burning will be used to reduce fuel loading near developed areas and achieve resource enhancement goals. Mechanical treatments, complemented by prescribed fire, will be employed to assist with the restoration and maintenance of the park's natural and cultural resources. An expanded research program will examine the role of fire and mechanical treatments in enhancing natural resources and the specific impacts of fire on these resources. Research will also be used to adaptively guide the fire management program and help maximize the benefits to park resources. Natural and cultural resource goals and objectives will be integrated into the design and implementation of fuel reduction projects.

Several actions that are part of the current GGNRA fire management program will continue under Alternative C. Some of these current activities are considered "best management practices" and are used by many land management agencies and fire districts. These actions include roadside fuel reduction; maintenance of defensible space around structures; the provision of fire education materials and public outreach; the continued implementation of successful fire management programs such as the Wildland Urban Interface Initiative coordinated with neighboring fire departments and homeowners' associations; fire effects monitoring; suppression of all wildland fires; centralizing the park's fire cache in a new structure; fire management actions for GGNRA lands within the City and County of San Francisco; and the fire management approach for Muir Woods National Monument. The NPS has been implementing the 1993 FMP strategy for Muir Woods National Monument for over a decade and would continue to do

so. The strategy uses prescribed fire and mechanical fuel treatments to reduce invasive species and fuel loading, and to restore the role of fire in the old growth coast redwood forest.

Based on the FMP, an implementation plan will be developed by the park's fire and resource management staff. The implementation plan will outline fire management actions that would occur over a 5-year planning period. This plan would be updated and reviewed annually for consistency with the FMP.

Other Alternatives Considered

In addition to the Selected Action, the FMP FEIS analyzes two alternatives for managing fire in the park, including a No Action Alternative. Similar to Alternative C (Selected Action), these alternatives are based upon park values, effective fire management strategies, NPS policy, and applicable law. Two other alternatives which focused on fuel reduction rather than a combination of resource and fuel reduction benefits were considered but dismissed.

Alternative A (No Action) – 1993 FMP, No Action

This alternative would be an update to the park's 1993 FMP only to reflect changes to the park's boundary (e.g., addition of new lands since 1993) and current national fire management policies. The focus of the 1993 FMP program is on ecosystem management through the application of prescribed fire to perpetuate fire-adaptive natural systems. This alternative would rely on the continued implementation of the 1993 FMP and recent emphasis on mechanical fuel reduction along with prescribed fire.

The six FMU's for Alternative A, derived from the 1993 FMP, are based upon vegetation communities. As shown in Table 1 below, a total of 210 acres could be treated by mechanical means and prescribed fire each year under this alternative. Nearly all of the projects would be in Marin County and account for 175 of the total 210 acres. An annual maximum of 110 acres for prescribed burning would be allowed; this total reflects what had been accomplished while the 1993 FMP was in full implementation in the 1990's. In practice, many fire management actions approved in recent years for GGNRA have been mechanical fuel reduction projects (e.g., mowing, cutting to remove nonnative shrubs and trees, and selective thinning in forested stands) as a result of the establishment of the Wildland Urban Interface Initiative. A combination of staff shortages, the requirement to develop a new FMP, and a year-long moratorium on prescribed burning has resulted in limited prescribed burning over the past five years.

Current research projects would continue and would focus on the role of fire to enhance natural resources and the effects of fire on key natural resources to determine the effectiveness of various fuel treatments. Prescribed burning would focus on resource management and research objectives with half of the annual acreage accounted for in projects within Muir Woods National Monument. Mechanical fuel reduction projects would focus on the park interface area in Marin County, consistent with projects funded in the past five years.

Alternative B – Hazard Reduction and Restricted Fire Use for Research and Resource Enhancement.

Under Alternative B, fire management actions would emphasize the use of mechanical methods to reduce fire hazards and fuel loads in areas with the highest risks. A total of 350 acres could be treated each year under this alternative – a maximum of 230 acres by mechanical means and a maximum of 120 acres through prescribed fire. Compared to Alternative A, Alternative B represents an increase in the number of acres mechanically treated each year. There would be a focus on the reduction of high fuel loads in the

Wildland Urban Interface FMU. Alternative B would permit the treatment of 50% fewer acres annually by mechanical treatment than the Selected Alternative. Limited use of prescribed fire could occur for research purposes within the park interior. Under Alternative B, prescribed burning is restricted to the Park Interior FMU in Marin County and Muir Woods FMU. No prescribed burning would occur in the San Mateo parklands. Research projects in Marin and San Mateo counties would examine the role of fire to enhance natural resources and the effects of fire on key natural resources to determine the effectiveness of various fuel treatments.

Table 1: Summary of Alternatives by Fire Management Unit (FMU) and Treatment Type

Treatment Type	County	Alternative A		Alternative B				Alternative C			
		All Fmu's ¹	Total	WUI FMU	Park Interior FMU	Muir Woods FMU	Total	WUI FMU	Park Interior FMU	Muir Woods FMU	Total
Mechanical Treatment (acres/yr)	Marin	75	100	130	45	5	230	130	90	5	275
	San Francisco	5		10	0	0		10	0	0	
	San Mateo	20		30	10	0		30	10	0	
	Total Acres	100		170	55	5		170	100	5	
Prescribed Burning (acres/yr)	Marin	100 ²	110	0	70	50	120	50	185	50	320
	San Francisco	<1		<1	NA	NA		<1	NA	NA	
	San Mateo	10		0	0	0		5	30	0	
	Total Acres	110		0	70	50		55	215	50	

Source: GGNRA Fire Management Office Data 2004.

Notes:

¹ Since 1993 FMP did not give number of acres per year for treatments by FMU, and since FMU's are by vegetation type and dispersed throughout park, total acreage is given by county only based upon projects cited in 1993 FMP and current practice.

² Includes 50 acres of prescribed burning in Muir Woods National Monument annually.

WUI = Wildland Urban Interface

NA = not applicable

Alternatives Considered for Inclusion in the EIS But Rejected

Two additional alternatives were considered for the GGNRA FMP but rejected as not meeting the purpose and need of the FMP. Developed in response to a suggestion during scoping, of the two alternatives proposed, one included no use of fire as a management tool and the second permitted fire to be used only in pile burning. Both alternatives focused on mechanical treatments to reduce fuels and fire hazard. The strategy for fire management at Muir Woods, which involves the reintroduction of fire into the ecosystem, could not be implemented under these alternatives. The first alternative, which did not permit pile burning, removed a very sustainable solution for disposing of cut vegetation. Often only part, and sometimes none, of the vegetation cut at a site can be chipped and broadcast in place; under this alternative all debris which could be chipped would have to be trucked to a legal disposal site. Chipping and broadcasting debris at a project site may be prohibited because it could alter favorable conditions for sensitive plant or animal species, involve the spread of invasive plant seeds or viable parts, suppress the native seed bank, or increase fire risk when if deposited overly thick. Pile burning is an important solution for vegetation harboring SOD, pitch pine canker, or other infectious diseases or pests that should neither be left onsite nor moved to another location.

After consideration, the alternatives were rejected as so many important FMP goals could not be achieved without some level of prescribed burning. Without the option of prescribed burning, there would be less opportunity to contribute to the enhancement and rehabilitation of cultural and natural resources through the use of prescribed burning. The park fire ecology and monitoring staff would not be able to build upon research and data derived first hand experience in the actual environment of GGNRA. The park fire staff would not expand their experience by planning and executing prescribed burns and the preferred strategy for reducing the potential for a high intensity wildland fire at Muir Woods could not be implemented being based on the reintroduction of fire into the Muir Woods ecosystem.

Environmentally Preferred Alternative

The analysis in the Final EIS determined that Alternative C is the environmentally preferred alternative. As described in the Final EIS, NPS and Section 101 NEPA criteria were used to make this determination. A summary of this analysis is as follows:

Alternative C will best achieve the purposes and goals of the plan by allowing for the use of a variety of management tools in order to achieve resource goals in balance with protection of visitors, life, and property. In comparison to Alternatives A and B, Alternative C's fire management treatment options provide the park with the flexibility to achieve, in a timely manner, a reduction in fire hazards that aid in the protection of human health, life, and property while also maximizing opportunities for restoring and maintaining ecological integrity, and protecting and enhancing the park's natural and cultural resources. Under Alternative C, the park's expedited implementation of fuel reduction projects in the urban interface areas would afford the greatest protection for park neighbors as well as the most sustainable approach to fire management. Alternative C presents the greatest potential for the control of stands of non-native evergreen forests within all of the FMU's which, once controlled, will require limited maintenance to discourage resprouting. With active restoration efforts from park staff and volunteer stewards, the areas that support stands of non-native evergreens should convert to native vegetation and require little maintenance in the long-term to maintain low fuel loading.

Alternatives A and B conform to FMP goals but would accrue benefits at much lower rates than Alternative C. Alternative A would achieve only one third the number of acreage for both prescribed burning and mechanical treatment than Alternative C. Alternative A, which continues the current resource-based FMP, would have a natural resource focus park-wide split into FMUs defined by vegetation type. Alternative A is not as closely allied to the life safety goal that is primary to current federal wildland fire policy. With the exception of specific WUI projects funding by the National Fire Plan, all project planning would continue to be natural resource based. Alternative B permits mechanical treatment at nearly the same level as Alternative C and would be nearly as effective in reducing excessive fuel loading as Alternative C. However, the amount of acreage of prescribed burning permitted annually is a third of that allowed in Alternative C and then only within the Interior FMU. No prescribed burning would occur in San Mateo County and no burns would be within the WUI FMU which often has the larger concentrations of escaped, invasive, non-native plants. Alternative B and C would permit similar annual achievements for mechanical treatment projects and both allow the greatest range of techniques to be used to treat cut vegetation based on environmental conditions. However, the higher annual acreage limits in Alternative C (at least 45 acres more annually of mechanical treatment and an additional 200 acres more of prescribed burning), with the ability to use prescribed burning throughout the park where warranted, results in a more proactive program that has the greatest potential to effectively reduce high fuel loading that currently threatens natural and built resources and public safety on both sides of the wildland urban interface.

Basis for Decision

After careful consideration of the alternatives presented, their environmental impacts, planning goals, and public comments received throughout the planning process, including comments on the Draft Fire Management Plan/Environmental Impact Statement, Alternative C has been selected for implementation. This alternative best accomplishes NPS and federal fire management policies, the legislated purpose of GGNRA, and the statutory mission of the NPS to provide long-term protection of park resources. The selected action best accomplishes the stated purposes of the Fire Management Plan as described in section 1.4, Purpose and Need for Action of the FMP FEIS. Alternative C offers the best combination of benefits with a high level of protection of life and property, and greater long- and short-term natural and cultural resource benefits than either Alternatives A or B.

A set of goals, developed and used in this planning process, were derived from guidance of the NPS Management Policies 2001 (NPS 2000) and NPS Director's Order and Resource Handbook 18, Wildland Fire Management (NPS 1999), in addition to federal policy and scoping input. The goals and subsequent management objectives describe what must be accomplished in order for the fire management program to be successful and were used to formulate the alternatives analyzed in this FMP FEIS. Of these goals, the first four are the criteria that were predominantly used to select Alternative C for implementation. Alternative C is the alternative which most successfully fulfills these goals, though each of the alternatives achieves the goals to a varying degree.

- 1. Ensure that firefighter and public safety is the highest priority for all fire management activities.*

This alternative would permit the broadest use of fire management strategies throughout the park (mechanical treatment, pile burns, and prescribed burning) to reduce fuel loading near developed areas

and resources. Alternative C permits a larger number of acres to be treated annually than the other alternatives considered and it will thus accelerate the reduction of fuels in areas that present wildland fire hazards to adjacent communities and to sensitive park resources. Under Alternative C, a greater amount of fuel reduction (total 595 acres) could be achieved by both mechanical treatment and prescribed burning in the planning area than either under Alternative A (total 210 acres) or Alternative B (total 350 acres).

Under Alternative C, a maximum of 320 acres of prescribed burns and 275 acres of mechanical treatments could occur annually. This acreage cap grants the park the flexibility to take advantage of years with favorable weather conditions and funding availability. Though all of the alternatives depend on a range of variables for success, risks to firefighters and the public would be reduced at a more rapid rate under Alternative C.

The flexibility in treatment options provided under Alternative C, particularly in the Park Interior FMU, will allow the park to link together areas treated by prescribed burning or mowing with other areas of naturally-occurring light fuels. These linked zones of reduced fuels will then serve to slow the rate of fire spread in the event of a wildland fire, resulting in additional time for evacuation and response, and will provide relatively safe areas from which to stage firefighting efforts.

2. Reduce wildland fire risk to private and public property.

Full implementation of this alternative would allow for the greatest number of acres to be treated annually to achieve fire management objectives. Compared to Alternative A, Alternative C permits nearly three times as much mechanical fuel reduction and prescribed burning each year. The higher amount of acreage allowed to be treated annually produces the most accelerated progress towards reducing fuels in critical areas around the park; almost 1,375 acres could be mechanically treated over a five year implementation plan based on the annual allowable acreages. The greater acreage and full range of fuel management techniques permitted in the WUI FMU under Alternative C provides more opportunities to plan and annually implement joint projects with other agencies to strategically reduce fuels across jurisdictional boundaries. Similar to the other alternatives, the objective of fuel reduction projects under Alternative C would be to establish areas of reduced fuels to slow the rate of fire spread and facilitate fire suppression. However, given the flexibility in management tactics and the number of acres that could be treated annually, more could be accomplished in a shorter amount of time to reduce fire risk to private and public property under Alternative C.

3. Protect natural resources from adverse effects of fire and fire management activities, and use fire management wherever appropriate to sustain and restore natural resources.

Alternative C is the least constrained alternative in terms of the types of treatments that can be applied in individual areas. Treatments under Alternative C would pursue the enhancement of natural resources (e.g., increasing abundance or distribution of habitat for threatened and endangered species; reducing infestations of nonnative plants; increasing native plant cover; managing the rate of vegetation conversion, etc.) in addition to other management goals. The focus for prescribed burns under Alternative C would be in areas where NPS ecologists believe ecosystem health would be enhanced by burning and in areas where fuel accumulations create fire hazards. To the extent possible, prescribed burns would be conducted to approximate natural fire intensity and fire intervals. The intent would be to allow the process of fire to act on the landscape as it has for thousands of years, to the greatest extent possible, while

ensuring human safety and protecting property. Prescribed fire would be used to reduce infestations of highly nonnative plant species, restore native habitat, and rehabilitate cultural landscape settings. Only Alternative C would permit prescribed burning to be used in conjunction with mechanical treatments in the Wildland Urban Interface FMU, thus providing a range of strategies to effectively control infestations of invasive, non-native plants. In addition, only Alternative C permits mechanical treatment in combination with prescribed burning to be used in the Park Interior FMU's of both Marin and San Mateo counties. As such, Alternative C will provide more opportunities for vegetation management projects which focus on native plant community rehabilitation and the control of isolated, invasive plant populations in areas where fuel reduction may be a low priority.

4. *Preserve historic structures, landscapes, and archeological resources from adverse effects of fire and fire management activities, and use fire management wherever appropriate to rehabilitate or restore these cultural resources.*

Alternative C proposes use of a broad range of fire management strategies throughout the park – mechanical treatment, pile burning, and prescribed burning – as a means to reduce fuel loading near developed areas and achieve resource enhancement goals. Projects would focus on the protection and/or enhancement of cultural resource elements and values (e.g., burning would be used to reduce vegetation in areas that are identified as important historic viewsapes). Fire management activities, especially carefully applied prescribed fire and mechanical fuel reduction treatments, will be used to stabilize, preserve, maintain, and restore cultural resources. For example, mechanical thinning can effectively remove hazardous fuels from cultural resources and their vicinity, as well as restore, enhance, or maintain ethnographic resources and cultural landscapes in cases where the risk of direct effect from the application of fire is too high. Fire management activities will help to maintain and protect historic buildings by reducing fuels around these structures, both through prescribed burns and mechanical treatment. Historic field patterns may be restored in pastoral ranching landscapes where former grassland is being succeeded by scrub. In addition, the removal of dense ground cover may lead to the revelation of previously unknown archeological sites. Since this alternative allows for the greatest number of acres to be treated on an annual basis to achieve fire management objectives, it will therefore afford the greatest level of protection and enhancement of cultural resources.

Findings on Impairment of Park Resources and Values

The NPS has determined that implementation of Alternative C (Selected Action) will not constitute impairment to park resources and values. This conclusion is based on a thorough analysis of the environmental impacts described in the FEIS, the public comments received, relevant scientific studies, and the professional judgment of the decision-maker guided by the direction in NPS Management Policy. While the plan has some negative impacts, in all cases these adverse impacts are the result of actions to preserve and restore park resources and values. Overall, the Selected Action results in major benefits to park resources and values and it does not result in their impairment.

In determining whether impairment may occur, park managers consider the duration, severity, and magnitude of the impact; the resources and values affected; and direct, indirect, and cumulative effects of the action. According to NPS policy, “An impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is: necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park; key to the natural or cultural integrity

of the park or to opportunities for enjoyment of the park; or identified as a goal in the park's general management plan or other relevant NPS planning documents" (NPS Management Policies, 2001).

The non-impairment policy does not prohibit impacts to park resources and values. The NPS has the discretion to allow impacts to park resources and values when necessary and appropriate to fulfill the purposes of the park, so long as the impacts do not constitute impairment. Moreover, an impact is less likely to constitute impairment if it is an unavoidable result of an action necessary to preserve or restore the integrity of park resources or values.

The actions comprising Alternative C will achieve the goals of the Fire Management Plan in a comprehensive, integrated manner that reduces fire-related risks while also allowing fire to be used to achieve resource management objectives. The potential for high-intensity catastrophic fire that would put high-value resources at risk would be greatly reduced under the Selected Alternative. The combined use of mechanical treatment and prescribed burning throughout the park would allow NPS to reduce fuel loading and also achieve resource enhancement goals in a more timely and efficient manner than the other alternatives. Under Alternative C, the FMP goals would be achieved in a productive, effective, and sustainable manner through a broad scope of treatments and treatment areas. Strategic areas of high fuel loading on the park's urban interface would be treated and maintained over a shorter period of time than under Alternatives A and B. Likewise, areas of nonnative plants would be treated earlier in the implementation of Alternative C and would therefore be treated before populations of nonnative species could expand to affect larger areas.

In conclusion, the NPS has determined that the implementation of Alternative C will not result in impairment of resources and values in GGNRA. This conclusion is documented in the FMP FEIS.

Measures to Minimize Environmental Harm

The NPS has investigated all practical means to avoid or minimize environmental impacts that could result from implementation of the selected action. The measures have been incorporated into Alternative C and are presented in detail in the FMP FEIS. A set of mitigation measures will be applied consistently to actions to implement this plan through the park's internal compliance processes. (See Attachment 1 – Mitigation Measures). Fire effects monitoring by the fire management staff and the GGNRA cultural and natural resource management programs will be implemented to detect deleterious results. The results from this program will guide and assure compliance monitoring, biological and cultural resource protection, noxious weed control, visitor safety and fire education, endangered, threatened and special status species protection, and other mitigation. In addition, the NPS will prepare appropriate compliance reviews under the NEPA, the National Historic Preservation Act, and other relevant legislation for future actions not covered by this EIS.

Public and Interagency Involvement

Scoping for EIS

Public scoping for the FMP EIS was formally initiated on August 8, 2003, with publication in the Federal Register of the Notice of Intent to Prepare an Environmental Impact Statement for the GGNRA FMP. In addition to the Federal Register notice, the scoping period was publicized through a mailing to the public that included background information on the FMP and a notice of scoping workshops. Scoping

comments were solicited from August 8, 2003, to December 5, 2003. Three open house meetings were held for the scoping of the GGNRA FMP. These meetings featured displays and offered attendees the opportunity to discuss the planning process with staff. In addition, internal NPS scoping sessions were conducted to identify staff issues and concerns.

Among the major issues raised during the scoping meetings were the need for monitoring fire management activities and the use of wildland fire and pesticides as fire management tools. In addition, the development of an education component for fire hazard reduction in adjacent communities was mentioned. Other concerns raised at the meetings included ongoing changes in land use as they relate to fire; the potential for changes in wind patterns and wind strength due to tree removal; public access limitations; use of native plant species to restore habitat; potential changes to visitor experience and aesthetics; increased fire risk and life safety; and effects on cultural resources, vegetation, wildlife, hydrology, water quality, soils, and air quality.

Review of EIS

A Notice of Availability for the Draft EIS (FMP DEIS) was published by the NPS in the Federal Register on March 21, 2005. The NPS also provided the notice of availability of the FMP DEIS through a direct mailing and posting on the park's web site. The FMP DEIS was made available for review at park headquarters, park visitor centers, local and regional libraries, and on the park's website. The EPA's Federal Register March 18 notice of filing initiated a 60-day public comment period ending on May 17, 2005 which was extended to May 27, 2005 to ensure adequate review time. The NPS conducted two public presentations and workshops on the FMP DEIS. The first workshop was held in San Mateo County as part of a regularly scheduled Pacifica City Council meeting on April 11, 2005. The second workshop was on April 19, 2005 in Marin County at the San Francisco Bay Model in Sausalito and was part of the regularly-scheduled, GGNRA bi-monthly public meeting. The public was encouraged to submit comments on the DEIS via email, fax, or regular mail.

Twelve comment letters were received (see Appendix H of the FEIS). Agencies commenting were the US Environmental Protection Agency, the State Clearinghouse, the State Department of Forestry and Fire Protection, the Marin County Community Development Agency, the San Mateo County Department Parks and Recreation, the Land and the Resources Division of the San Francisco PUC. Two members of the Pacifica City Council submitted comments as well as 3 members of the public. The EPA provided comments as required in their role of statutory administrator of NEPA, the Council on Environmental Quality implementing regulations and the Clean Air Act.

All comment letters are reprinted in Appendix H to the FMP FEIS and each letter is followed by the NPS response to the letter's comments. The major issues raised during the public comment period included: smoke management, clarification of the text on conformance with air quality regulations and the State Implementation Plan, herbicide use, protection of riparian and wetland areas, range of alternatives considered, effects on Monarch butterfly habitat, and the need and benefits from interagency cooperation. On February 10, 2006 the EPA published their notice that the FEIS is "complete and fully adequate" in the Federal Register.

The NPS's Notice of Availability for the FMP FEIS was published in the Federal Register on December 28, 2005. Following the EPA's notice of filing published in the FR on December 23, 2005 the waiting period for preparation of the Record of Decision ended on January 23, 2006. The FMP FEIS was posted on the NPS park planning website and a postcard notification of its availability was mailed to 1,400 interested parties, including agencies and organizations which had requested information on the FMP FEIS or were on the park's planning office mailing list. Forty-seven individuals, organizations, and agencies that had received a copy of the FMP DEIS in either printed or CD format or had since requested a copy were sent the FMP FEIS in the format requested. The FMP FEIS was distributed to the GGNRA Visitor Centers and twenty-four libraries in Marin, San Francisco, San Mateo and Alameda counties.

Following distribution of the FEIS, the park received several requests from the public and agencies for copies of the document, and a private citizen request for additional information on the use of herbicides and fire retardant chemicals in the Muir Beach and Redwood Creek vicinity. The park responded that the park's preference is to use no retardants for suppression wherever possible and particularly in the vicinity of Redwood Creek, which provides habitat for listed salmonids. The Marin County Fire Department, as a CDF contract agency, has agreed to consult with the NPS before using retardants in the Redwood Creek drainage. It is mutually agreed that the protection of life and safety is the number one priority in any fire suppression effort and the use of retardants may be necessary where these threats are present. No herbicides have been used at the Golden Gate Dairy in conjunction with eucalyptus removal nor is any planned for this area or for work along Muir Woods Road. In conformance with the Endangered Species Act consultations undertaken for the FMP, direct applications to the cut stumps of eucalyptus, acacias or other readily resprouting non-native trees, is allowed in riparian or wetland habitats supporting special status species during the dry season (roughly July 1 through November 15), never within the wetted channel of the drainage and only when conditions meet the requirements of mitigation measures VEG-8 to prevent wind drift of herbicide.

Agency Consultation and Coordination

Advisory Council on Historic Preservation. The National Historic Preservation Act (NHPA) requires agencies to take into account the effects of their actions on properties listed in or eligible for listing in the National Register of Historic Places. The Advisory Council on Historic Preservation has developed implementing regulations (36 CFR 800) that allow agencies to develop agreements for consideration of these historic properties. The NPS, in consultation with the California State Historic Preservation Officer (SHPO), developed a Programmatic Agreement for the FMP based upon an existing draft Department of the Interior Fire Management Plan Programmatic Agreement. The NPS invited the participation of the Advisory Council, affected American Indian tribes, and the public in this consultation process. This Programmatic Agreement provides a process for compliance with the NHPA and includes stipulations for identification, evaluation, treatment, and mitigation of adverse effects for actions affecting historic properties. The NPS initiated consultation on the GGNRA FMP by letter to the SHPO dated May 23, 2003. Consultation was completed with the signing of the Programmatic Agreement on September 30, 2005. The Programmatic Agreement for Fire Management Activities is included as Appendix J in the FMP FEIS.

U.S. Fish and Wildlife Service and National Marine Fisheries Service (NMFS). The Endangered Species Act (ESA) protects threatened and endangered species, as listed by the U.S. Fish and Wildlife Service (USFWS), from unauthorized take, and directs federal agencies to ensure that their actions do not

jeopardize the continued existence of listed species. Section 7 of the ESA defines federal agency responsibilities for consultation with the USFWS and National Oceanic and Atmospheric Administration National Marine Fisheries Service (NMFS) and requires preparation of a Biological Assessment to identify any threatened or endangered species that are likely to be affected by the proposed action.

The NPS initiated informal consultation with the USFWS on June 18, 2003. Upon request, the USFWS sent the NPS a species list for the GGNRA FMP EIS covering Marin, San Francisco, and San Mateo counties, as well as for the specific United States Geological Survey (USGS) quads within those counties in which NPS fire management activities will take place.

The NPS sent a biological assessment to the USFWS on March 16, 2005 to determine if formal consultation under Section 7 of the Endangered Species Act would be required for the GGNRA FMP. The NPS requested formal consultation with NMFS Fisheries Service on potential effects on listed salmonids and Essential Fish Habitat in a letter dated March 21, 2005.

USFWS issued a Final Biological Opinion on the GGNRA FMP EIS on October 7, 2005 (see Appendix K of the FMP FEIS). The Final Biological Opinion lays out the USFWS conclusions regarding the numerous listed wildlife and plant species within the FMP FEIS planning area and proposes several mitigation measures to assure protection of the species. All recommendations of the USFWS have been incorporated into the listing of mitigation measures included in Chapter 2 of the FMP FEIS and Attachment 1 to this ROD. The USFWS conclusions regarding implementation of Alternative C, the Preferred Alternative are:

1. Implementation of the FMP is not likely to jeopardize the continued existence of the mission blue butterfly, California red-legged frog, the San Francisco garter snake, Raven's manzanita, San Francisco lessingia, Presidio clarkia, and the Marin dwarf flax nor is it likely to destroy or adversely modify proposed California red-legged frog critical habitat. Critical habitat has not been designated or proposed for mission blue butterfly, San Francisco garter snake, Raven's manzanita, San Francisco lessingia, Presidio clarkia, and the Marin dwarf flax, therefore, none will be affected.
2. Implementation of the FMP is anticipated to result in incidental take of the mission blue butterfly, California red-legged frog, and the San Francisco garter snake. The nondiscretionary conservation measures proposed by the NPS and described in the FEIS and ROD will substantially reduce but do not eliminate the potential for incidental taking of these listed species. The USFWS has determined that the level of anticipated take is not likely to result in jeopardy to the three listed wildlife species and proposed critical habitat of the red-legged frog.
3. Implementation of the FMP is not likely to adversely affect the San Bruno elfin butterfly, the salt marsh harvest mouse, tidewater goby, California brown pelican and the Pacific Coast population of the western snowy plover because of the avoidance measures included in the proposed project, actions proposed are either outside the range of the listed species or the action area does not contain suitable habitat for the taxa.
4. The USFWS concurs that Alternative C is not likely to adversely affect the northern spotted owl because of the specific measures for owl protection that will be implemented with the FMP regarding the siting and timing of project actions in relation to owl activity sites, limits on tree

and understory canopy modification near owl activity sites, avoiding disturbance of woodrat nests, limiting removal of larger diameter trees, and conducting post-project monitoring.

5. The USFWS concurs with the determination that the proposed project is not likely to adversely affect the marbled murrelet because of specific avoidance measures that will be implemented with the FMP regarding timing and siting of project actions, and avoidance the felling trees of larger diameter trees.

NMFS issued a Biological Opinion on the FMP FEIS on February 8, 2006 addressing potential effects of the FMP on the Central California Coast coho salmon (*Oncorhynchus kisutch*), an Evolutionary Significant Unit (ESU) and the Central California Coast steelhead (*Oncorhynchus mykiss*), designated a Distinct Population Segment.

The Magnuson-Stevens Fishery Conservation and Management Act, as amended by the Sustainable Fisheries Act of 1996 (PL 104-267), requires all federal agencies to consult with NMFS Fisheries on all actions or proposed actions permitted, funded, or undertaken by the agency that may adversely affect Essential Fish Habitat (EFH). NMFS provides recommendations to agencies through the Section 7 Consultation process to conserve EFH when agency activities may adversely affect EFH. Critical habitat has been designated for coho salmon and steelhead and includes streams and riparian areas within the FMP action area, triggering conformance with the Magnuson-Stevens Act.

After review of the biological assessment, best available scientific and commercial information, current status of the listed species, information on the environmental baseline of the action area, the anticipated effects of implementation of the FMP and cumulative actions, NMFS concluded that the FMP is unlikely to jeopardize the continued existence of the Central California Coast coho salmon or steelhead and unlikely to adversely modify their designated critical habitats. After review of the mitigation measures proposed for the control of erosion and protection of salmonids, NMFS recommended an additional conservation measure, taken directly from wording within the FEIS, be included to protect salmonid habitat from effects of herbicide use (see VEG-8 in Attachment 1). Modifications to two FMP mitigation measures (SS-12 and SS-13) were also requested. The issuance of an incidental take statement for the programmatic FMP was not required by NMFS.

As a condition supporting the issuance of their findings on the FMP, NMFS requires that the NPS provide them annually with information on the proposed implementation efforts for the upcoming fiscal year. Information will include a map of the project area, a project description and an assessment of potential effect on coho salmon and steelhead. NMFS will respond to the annual project report in writing within set time periods and inform the park whether the proposals may be appended or tiered from the programmatic biological opinion or whether project modifications, additional information or a separate consultation will be required.

California Coastal Commission. The Coastal Zone Management Act protects coastal environments. While the act transferred regulatory authority to the states and excluded federal installations from the definition of the "coastal zone," it requires that federal actions be consistent with state coastal management plans. Activities taking place within the coastal zone under the definition established by the California Coastal Management Plan (CCMP) require a federal consistency determination. The FMP FEIS was submitted to the California Coastal Commission for federal consistency determination. In a letter dated February 10, 2006, the Coastal Commission determined that the programmatic FEIS would

not adversely impact coastal resources and would meet the requirements for a negative determination with the adoption of a requirement for the NPS to provide the CCC Executive Director annually with an implementation plan. The Executive Director requested that NPS staff meeting annually with CCC staff to discuss how implementation of the annual work plan and mitigation measures will ensure protection of sensitive coastal resources. The NPS will submit additional consistency and/or negative determinations to the Commission for any future FMP projects within GGNRA that hold the potential to adversely affect resources within the coastal zone.

Changes Made for the Final EIS

A number of minor changes were made in the FEIS based on public comment received during the review period for the DEIS.

- A tenth FMP goal, accompanied by two objectives, to address smoke management and protection of air quality was added to the list of FMP goals in Chapter 1
- Figures 2-7, Fire Roads North Lands, and 2-8, Fire Roads South Lands were removed from the document and text edits were made to clarify which road-related functions at GGNRA are the responsibility of fire management staff (and are within the scope of the FMP FEIS) and which are the responsibility of other NPS divisions.
- Additional information was provided on herbicide use in conjunction with mechanical fuel removal as requested by the U.S. Environmental Protection Agency (EPA). This includes information on the park's common herbicide used, the review and approval process, regulatory conformance, protections for sensitive resources, the public and firefighters.
- Changes were made to the Mitigation Measures for Air Quality and Special Status Species in response to a comment from the EPA. As a result of the consultation between the NPS and the U.S. Fish and Wildlife Service (USFWS), two new Special Status Species mitigation measures were added. NMFS requested that a paragraph from FEIS Chapter 4 regarding herbicide application be added to the list of mitigation measures and that text modifications be made to two Special Status Species mitigation measures addressing protection of salmonids.
- On the recommendation of the EPA, changes were made to the Impacts on Air Quality section to clarify the relationship between BAAQMD's smoke management plan (SMP) and the State Implementation Plan (SIP). Text was added to address whether the three FMP alternatives would trigger a conformity analysis with the SIP; new text and a new table were also added to explain and state the *de minimus* levels for criteria pollutants with which the Air Basin is in nonattainment or maintenance status; and Table 3-4 was updated to reflect the current attainment status of criteria pollutants for the Bay Area Air Basin.
- In response to the EPA's request for more information regarding smoke management practice, a new appendix was added that lists smoke management techniques and non-burning alternatives that GGNRA could incorporate into a smoke management plan and/or that BAAQMD could require as part of the smoke management plan approval process. The referenced appendix is Appendix I – Non-burning Alternatives and Air Emissions Reduction Techniques for Fuel Reduction and Resource Benefiting Prescribed Burns in GGNRA.

Conclusion

Alternative C provides the most comprehensive and effective method among the alternatives considered for meeting the NPS purposes, goals, and objectives for managing fire and fire risks in GGNRA and for meeting national environmental and fire policy goals. The selection of Alternative C, as reflected in the *Final Fire Management Plan/Environmental Impact Statement* would not result in the impairment of park resources and would allow the NPS to conserve park resources and provide for their enjoyment by visitors.

Approved:

[Signed by Jon Jarvis on 2/23/06]

Jonathan B. Jarvis, Regional Director

Date

Pacific West Region, National Park Service