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## PACIFIC WEST REGIONAL OFFICE Memorandum

L7617 (PWRO-P)

DEC 27 2006

Memorandum

To: Superintendent, Cabrillo National Monument  
From: Regional Director, Pacific West  
Subject: Environmental Compliance for Fire Management Plan

The *Finding of No Significant Impact* (FONSI) for the Monument's fire management program is approved. To complete the conservation planning-environmental impact analysis process for this fire planning effort, at the time when the decision is announced, copies of the approved FONSI should be made available to all organizations and individuals that commented on or received the supporting environmental assessment.

Jonathan B. Jarvis

Attachment

# FINDING OF NO SIGNIFICANT IMPACT

## *Naval Base Point Loma and Cabrillo National Monument Joint Wildland Fire Management Plan Environmental Assessment*

### **Cabrillo National Monument San Diego, California**

December, 2006

## **Introduction**

The National Park Service (NPS) and the U.S. Navy (Navy) prepared an environmental assessment (EA) that analyzed alternatives pertaining to implementing a joint wildland fire management program capable of serving the needs of both Cabrillo National Monument (CNM) and Naval Base Point Loma (NBPL). As the two largest landowners within the Federal reservation on the Point Loma peninsula, it made sense economically and from a cooperative management standpoint to jointly plan a comprehensive fire management program. The outcome is that the first fire management plan to be implemented for both Cabrillo NM and NBPL has been completed. Although the program covers common fire management concerns, the NPS and the Navy prepared separate Finding of No Significant Impact (FONSI) decisions for each agency's actions in the joint wildland fire management plan.

## **Purpose and Need for Fire Management Plan**

According to the Federal Wildland Fire Policy, federal agencies such as the Navy and the NPS, that have vegetation that can burn in a wildfire, are required to develop a fire management plan to address that possibility. In addition, the management authorities for the NPS, including Director's Order 18, "Wildland Fire Management," and its companion reference manual (RM-18), require that all parks with vegetation capable of supporting fire develop a fire management plan. The purpose of the joint wildland fire management plan is to:

1. protect personnel, facilities, and the natural and cultural resources from the impacts of wildland fire;
2. ensure perpetuation of native terrestrial habitats, fire-adapted plant communities, and rare species; and
3. minimize the total cost of fire pre-suppression and suppression practices on lands owned by the Navy and NPS on Point Loma.

## **Selected Fire Management Plan**

The NPS will implement the Proposed Action, which is also the environmentally-preferred alternative, as presented in the Environmental Assessment. There are no substantive modifications included in the Selected Action (due either to public comment or agency consults), nor are there any changes in the conclusions made about the nature of the potential environmental consequences. The NPS will collaborate with the Navy in jointly planning and conducting a wildland fire management program (JWFMP) to provide for coordinated

suppression. In regards to the fire program activities to be implemented solely by the park, the Superintendent may in addition provide for future limited experimental use of prescribed research burns to achieve ecological benefits on park lands, and will maintain discretion for determining areas of fuels management as necessary to provide for human safety and resource protection. The park's WFMP will be updated by the NPS annually in accordance with DO18 and RM18 (Chapter 10). The following is a summary of key fire management program goals and objectives to be achieved:

1. Provide for human safety as the first priority of each fire management activity.
2. Protect the economic investment on Pt. Loma by reducing risk of ignitions and hazardous fuel conditions near federal facilities and infrastructure.
3. Protect cultural, historic, archeological and commemorative resources.
4. Ensure sustainability of ecological resources and protect the full range of native biodiversity while controlling non-native species.
5. Promote understanding of the scope and effect of wildland fire management and the role of fire in the southern California mediterranean ecosystem.
6. Integrate and coordinate NPS and U.S. Navy fire management activities.

Accordingly, the plan selected to be implemented for the Monument calls for: increased communications and preparedness among the U.S. Navy, the Federal Fire Department (FFD) stationed at Naval Base Point Loma, City of San Diego Fire Department and NPS by means of an annual preparedness meeting and creation of new agreements; sharing information about sensitive natural and cultural resources; implementing the National Fire Danger Rating System (NFDRS) and Remote Automated Weather Station (RAWS) and monitoring of live fuel moisture levels by Cabrillo NM staff; joint Navy/FFD and NPS training; compliance, where feasible, with national building and fire codes and the installation of fire detection, warning and suppression systems in historic buildings, library, museum collection spaces; posting of current fire danger level warnings; and implementation of a fire education program. The Superintendent, in strict accordance with the standards in Director's Order and Reference Manual 18, exercises discretion for: determining defensible space around structures that cannot afford to be lost, and also the use of fire-safe materials in new construction (and in retrofitting structures, where feasible); for establishing fuel management areas along public roads to reduce the possibility of accidental ignitions; for trimming or removal of flammable eucalyptus trees in the vicinity of historic wooden structures; monitoring all fuels management areas for invasive weeds and managing invasive weeds following a fire; conducting future small-scale experimental burns for research purposes in maritime succulent scrub or in southern maritime chaparral; annual updates in the WFMP; and other fire management activities as appropriate.

The selected plan best meets the purpose and the goals of the joint wildland fire management program by providing for human safety, protecting the public investment in facilities, infrastructure and cultural resources, ensuring the sustainability of ecological resources, controlling risk and hazardous fuels, implementing an education program that enhances understanding of the fire management mission, developing and maintaining staff expertise in all aspects of fire management, integrating the fire management program into on-going operations and activities, fostering and maintaining interagency fire management partnerships, and complying with NPS and Navy fire policies that address the fire management issues both landowners face while achieving their respective missions.

## **Other Alternatives Considered and the “Environmentally Preferred” Alternative**

In addition to the selected alternative described above, the environmental assessment evaluated potential effects of a No Action alternative and two “action” alternatives, one without prescribed fire for ecological effect and one with minor variations in fuels management options. In accordance with Council on Environmental Quality regulations implementing the National Environmental Policy Act (NEPA) and the National Park Service Director’s Order 12 (NEPA guidelines), the environmental assessment also identified an “environmentally preferred” alternative. Such an alternative must meet the criteria established in section 101(b) of NEPA. To be considered an “environmentally preferred” alternative a plan or program must meet the following criteria:

1. Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations.
2. Ensure for all Americans safe, healthful, productive, and esthetically and culturally pleasing surroundings.
3. Attain the widest range of beneficial uses of the environment without degradation, risk to 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 would permit high standards of living and a wide sharing of life’s amenities.
6. Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The selected plan (Proposed Action) was deemed to be “environmentally preferred” because overall it would best meet the requirements of Section 101(b) of NEPA while balancing management objectives with issues of concern. The Selected Action best realizes criteria 1, 2, 3 and 4, since, like the others, it calls for immediate suppression of all ignitions regardless of source, and also provides for managing fuels to achieve defensible and survivable space around all buildings that cannot afford to be lost with minimum impact to surrounding native vegetation consistent with applicable fuel models for Point Loma habitats, provides safeguards to reduce risk of accidental ignitions along public roads by establishing fuel management areas, provides for the use of fire-safe building materials, and would ensure perpetuation of native habitats, rare species and fire adapted plant communities.

Under Alternative 1, the same management program set forth in the Proposed Action would be implemented at the Monument, except that fuels management would be extended out 100 feet measured horizontally from each building. This would result in additional impacts to surrounding native vegetation without any demonstrated advantage to the protection of life and property. Similarly, it would not afford any greater protection to cultural resources than the selected plan. Therefore, this alternative does not realize NEPA criteria 1, 2 and 3 to any greater degree than does the Proposed Action, while realizing criteria 4 to a far less degree.

Under Alternative 2, the same management program proposed in the Selected Action would be implemented, except that the small-scale experimental burns would not take place. All fires

would be immediately suppressed regardless of ignition source; fuels management would occur along each public road and out to a maximum of 50 feet measured horizontally from buildings, and fire-safe building materials would be used. However, the knowledge that is expected to be gained from the limited experimental research burns about how maritime succulent scrub and southern maritime chaparral along the coast responds to fire after decades of not being burned, what fire-dependent or fire-adapted plants exist in the seed bank, and what options may be identified for ensuring perpetuation of native habitats would not become available to the NPS. Alternative 2 does not realize NEPA criteria 1, 2, 3 and 4 to the same degree as does the Selected Action.

Alternative 3, the No Action alternative, would continue the current fire management program, and all fires regardless of the source of ignition would be extinguished as soon as possible. The safety of the visiting public and employees would continue to be a priority and area fuels management would occur to the extent feasible, though protection of the NPS' investment in Monument facilities through the use of fire-safe building materials would not be greatly enhanced. Perpetuation of native habitats could be hampered due to the lack of research findings that could be gained by conducting the experimental burns in maritime succulent scrub and southern maritime chaparral. The No Action alternative does not realize criteria 1, 2, 3 and 4.

### Measures to Minimize Environmental Harm

Mitigation measures and other safeguards have been incorporated into the selected joint wildland fire management program to minimize potential environmental impacts to the fullest extent possible. General mitigation measures relating only to the fire management activities to be undertaken by the NPS are summarized in the matrix below (the Navy may undertake additional actions with regard to its land and facilities).

**Impact/Mitigation Matrix**

| Impact Topic           | Mitigation Measures   | Responsibility   |
|------------------------|---|--|
| <p><b>Land Use</b></p> | <p><u>Experimental burns</u>: The overall effect of the Selected Action would be long-term and beneficial. Hand tools would be used to create fuel breaks around each proposed burn plot to minimize impacts and promote recovery of affected vegetation.</p>   | <p><b>FMO MCN*</b></p>   |
|                        | <p><u>Fuel management areas</u>: Mechanical fuels management would result in a change in land use in narrow wildland areas along public roads and around high-value structures. The amount (square footage) of defensible space created and the impacts to vegetation would be minimized at the Superintendent's discretion by implementing the following:</p>  | <p><b>Park/Chief, RM &amp; VP**</b></p>                          |
|                        | <ol style="list-style-type: none"> <li>1. Prepare a fuels management plan for defensible space and fuel management areas along public roads; this plan would be added as an appendix to the JWFMP and would be used by park staff supervising this work.</li> <li>2. Conduct building-by-building surveys based on the criteria in the JWFMP, which take into account sensitive habitat for RT&amp;E</li> </ol> | <p><b>Park/Chief, RM &amp; VP</b></p> <p><b>Park: Chief,</b></p> |

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|                             | species, conservation/scenic value of adjacent vegetation, whether the structure is occupied or on or contributing to the National Register of Historic Places, the value of the building and its contents, whether the structure is built of fire-resistant materials, and its location relative to burnable vegetation. Defensible space would be created using hand tools to treat vegetation. The amount (square footage) of fuel management area along public roads would be minimized by conducting road-by-road surveys based on criteria similar to those for defensible space and also include the risk of accidental ignitions along that portion of road, hazardous fuel conditions, proximity of structures and the effectiveness of the road as a fuel break.   | <b>RM &amp; VP and Chief, NRS***</b>                               |
| <b>Topography and Soils</b> | The Selected Action could result in both beneficial and adverse impacts. Potential impacts are avoided by keeping fuel modification areas to a minimum through the building-by-building and road-by-road surveys; thinning rather than clearing vegetation to bare soil; the small size of the experimental research burn plots; siting new buildings away from habitat edges, avoiding fire line construction during suppression and use of Minimum Impact Suppression Tactics (MIST), followed by appropriate burned area rehabilitation after a wildfire.   | <b>Park: Chief, RM&amp;VP and Chief, NRS</b>                       |
| <b>Water Resources</b>      | <u>Experimental burns:</u> The total area for the experimental is small, (.89 acres), with a correspondingly small area affected by the construction of fuel breaks. As a result, erosion and sediment flowing into drainages or nearby ocean/bay waters is expected to be negligible. The proposed locations for the research burns are expected to be far enough from the ocean/bay to prevent sediments or retardant from entering the water.<br><br><u>Fuel management areas:</u> To reduce erosion and its potential effect on water resources, the vegetation around structures and along public roads will be lowered and thinned, not cleared to bare soil.  | <b>FMO MCN</b><br><br><b>Park: Chief, RM&amp;VP and Chief, NRS</b> |
| <b>Plant Communities</b>    | <u>Experimental burns:</u> Effects of the experimental burns on treated plant communities would be short-term and minor and would be minimized by limiting plot size to 30m x 30m (< .25 ac each, approximately .89 acs total), and adequate planning and assignment of fire-fighting resources to reduce risks of such burns escaping containment. Research findings gained from these burns would contribute to the long-term preservation of the maritime succulent scrub and southern maritime chaparral plant communities on Point Loma.<br><br><u>Fuel management areas:</u> The effect of fuel management activities on plant communities would be adverse, long-term and minor. The impact would be minimized by conducting a building-by-building survey, and at the Superintendent's discretion necessary defensible space would be created to protect park structures and their inhabitants/contents. The same approach would be followed | <b>FMO MCN</b><br><br><b>Park: Chief, RM&amp;VP and Chief NRS</b>  |

|                                    |   |   |
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|                                    | <p>for the creation of fuel management areas along public roads in the park to reduce the risk of accidental ignitions. It is estimated that a maximum of 1.15 acres around structures and 3.15 acres along public roads within the park and the Point Loma Ecological Conservation Area (PLECA) would be impacted. This would be mitigated by restoring .13 acres of coastal sage scrub habitat in the vicinity of the Whale Overlook following removal of approximately 5,720 square feet of no longer needed asphalt walk. Hand tools will be used to shorten and thin the vegetation rather than removing all vegetation to bare soil with heavy equipment, and using the California Conservation Corps to remove exotic vegetation from 5 acres of the PLECA adjacent to the Monument.</p>   |   |
| <p><b>Wildlife Populations</b></p> | <p>The overall effect of the Selected Action would be a net benefit to wildlife. The effect on habitat around structures and along roads from fuels management could be considered long-term, adverse and minor on wildlife habitat and populations that depend on dense shrubs or trees on habitat edges, or that may use the flammable native California sagebrush, California buckwheat, sage species and chamise on these edges.</p> <p><u>Experimental burns:</u> Impacts to wildlife could be adverse, short-term and minor due to mortality in a small number of species, but would be minimized by surveying the proposed plots for biota in all classes and providing opportunities for animals to escape prior to ignition.</p> <p><u>Fuel management areas:</u> In the fuel management areas, impacts to habitat and the wildlife that depend upon it, would be minimized by conducting the building-by-building and road-by-road surveys and applying their respective criteria to keep the affected area to a minimum, and conducting the work outside the bird breeding season (Feb. 15 – Aug. 30), or surveying the area for nesting birds prior to the work. The area known as the Myoporum Grove is excluded from routine fuel management efforts.</p> | <p><b>Park: Chief, RM &amp; VP and Chief, NRS</b></p> <p><b>Park: Chief, RM &amp; VP and Chief, NRS</b></p> |
| <p><b>Sensitive Plants</b></p>     | <p>The overall effect on sensitive plants in the Monument is a net benefit that is moderate and long-term (the only plant protected under the Endangered Species Act, <i>Chorizanthe orcuttiana</i>, is found only on Navy land).</p> <p><u>Experimental burns:</u> To minimize any potential effects on sensitive plants, a criterion for siting the plots for the research burns is to avoid those locations that contain Federal or State-listed or eligible plants, and to survey potential sites for sensitive plants.</p> <p><u>Fuel management areas:</u> In the fuel management areas, impacts to sensitive plants would be avoided by conducting the building-by-building and road-by-road surveys and applying their respective</p>   | <p><b>Park: Chief, NRS</b></p> <p><b>Park: Chief, RM&amp;VP and Chief, NRS</b></p>                          |

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|                           | criteria, flagging sensitive plants, and by either avoiding those areas that contain sensitive plants, or not cutting/shortening sensitive plants.   |   |
| <b>Sensitive Wildlife</b> | <p>The overall effect is a net benefit to sensitive wildlife that is minor and long-term.</p> <p><u>Experimental burns:</u> To minimize any potential effects on sensitive wildlife, a criterion for siting the plots for the research burns is to avoid those locations that contain Federal or State-listed or eligible wildlife, to survey potential plots for sensitive wildlife, and to avoid those areas where special status species are found.</p> <p><u>Fuel management areas:</u> Impacts to sensitive wildlife would be avoided, or minimized, by conducting the building-by-building and road-by-road surveys, applying their respective criteria, which includes assessing each area for the presence of sensitive wildlife or its habitat, and incorporating recommendations for protecting special status species into the project.</p> | <p><b>Park: Chief, NRS</b></p> <p><b>Park: Chief RM&amp;VP and Chief, NRS</b></p> |
| <b>Invasive Species</b>   | The potential exists for the experimental research burns and/or fuel management activities around buildings and along public roads to contribute to the establishment and spread of invasive plants by opening the plant canopy. Such encroachment will be minimized by preparing an Invasive Weed Management Plan (IWMP) and applying the criteria in the JWFMP: conducting the building-by-building and road-by-road surveys to keep the areas being managed to a minimum, removing exotic vegetation, planting managed areas with low-growing, native fire-resistant plants, and monitoring for appearance of weeds and removing them as specified in the weed management plan. The IWMP will be prepared in consultation with the USFWS.   | <b>Park: Chief, RM&amp;VP and Chief, NRS</b>                                      |
| <b>Air Quality</b>        | <p>Anticipated effect of the Selected Action is short-term and minor.</p> <p><u>Experimental burns:</u> The 30m x 30m (&lt; .25 ac) size of the plots for the research burns will minimize their effect on air quality. In addition, a smoke management plan will be prepared and such burns will only be conducted on days permitted by the San Diego Air Pollution Control District.</p> <p><u>Fuel management areas:</u> Fuels management activities, such as the creation of defensible space around structures and fuel management areas along public roads, will be done by hand tools, and gas-powered chain saws/weed whackers. Such activities are considered routine and would be short-term and temporary, and clearly <i>de minimus</i> under EPA's General Conformity Rule.</p>   | <p><b>FMO MCN</b></p> <p><b>Park: Chief, RM&amp;VP and Chief, NRS</b></p>         |
| <b>Cultural Resources</b> | <u>Experimental burns:</u> Proposed sites for research burns will be reviewed by the park historian and situated to avoid archeological sites, historic structures and the park's museum storage facility.   | <b>Park: Historian and FMO MCN</b>  |



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|--|--|--|
|  | <p><u>Fuel management areas:</u> To minimize impacts to cultural resources, in particular archeological sites, fuel modification projects will be reviewed by the park historian. Hand tools will be used to thin and shorten vegetation along public roads that are adjacent to archeological sites and within defensible space adjacent to historic structures. Vegetation will be thinned and shortened and not cleared to bare soil in areas bordering archeological sites and historic structures.</p>  | <p><b>Park:<br/>Historian and<br/>Chief,<br/>RM&amp;VP</b></p>   |
| <p><b>Recreation<br/>and<br/>Scenic<br/>Values</b></p> | <p><u>Experimental burns:</u> To minimize impacts to visitor enjoyment of park resources and values, burns will not be scheduled during high use periods such as holidays and weekends. Every effort will be made to schedule them early in the week when visitation is lowest. The small size of burn plots will limit the duration of experimental burns to less than 30 minutes. Fuel breaks around burn plots will be blended in to lessen the distinction between the plot and surrounding vegetation. Traffic warning signs will be posted and road closures kept to the minimum necessary for the safety of visitors. Interpretive signs explaining the purpose of the burns and role of fire in coastal mediterranean ecosystems will be posted.</p> <p><u>Fuel management areas:</u> Mechanical fuels management will result in minor, permanent effect on scenic values in visible areas along public roads and around certain structures. At the discretion of the Superintendent, the amount (square footage) of defensible space created and resulting visible impacts will be minimized by conducting building-by-building surveys based on sensitive habitat for RT&amp;E species, conservation/scenic value of vegetation, whether the structure is occupied or is on or is a contributing NRHP element, the structure is built of fire-resistant materials, its location relative to burnable vegetation and the value of the building and its contents, and using hand tools to thin/shorten vegetation. The amount (square footage) of fuel management areas along public roads will be minimized by conducting road-by-road surveys based on criteria similar to those for defensible space and take into account the risk of accidental ignitions along that portion of road, hazardous fuel conditions, proximity of structures, conservation concerns, the effectiveness of the road as a fuel break, and the type of native vegetation along the road.</p> | <p><b>FMO MCN<br/>and Park:<br/>Chief,<br/>RM&amp;VP and<br/>Chief of I****</b></p> <p><b>Park: Chief,<br/>RM&amp;VP</b></p> |

\*FMO MCN – Fire Management Officer, Mediterranean Coast Network duty stationed at Santa Monica Mountains National Recreation Area, Thousand Oaks, California

\*\*Chief, RM & VP – Chief, Resource Management & Visitor Protection

\*\*\*Chief, NRS – Chief, Natural Resource Science

\*\*\*\*Chief of I – Chief of Interpretation

### Why the Selected Action Would Not Have a Significant Effect

Based on the environmental impact analysis as documented in the EA, there would not be any significant environmental consequences, individually or cumulatively, associated with implementing the Selected Action. The long-term, adverse, but minor, effects on vegetation

resulting from the implementation of the Selected Action, in particular the creation of defensible space around important structures and fuel management areas along public roads, are far outweighed by the enhanced protection of human life and the investment in infrastructure, and the long-term protection against catastrophic fire where all the vegetation would be lost in a single event and maintenance of a uniform, rather than a diverse, fire regime that results from fuels management.

There are no highly uncertain or controversial impacts, unique or unknown risks, significant connected actions or indirect effects, or elements of precedence identified. Public safety and protection of property will be enhanced by implementation of the Selected Action. There would be no violation any Federal, state or local environmental protection law. No significant, negative cumulative impacts related to the Selected Action were identified when combined with one or more than one of the known projects listed in the EA.

In addition, the Selected Action, which is also the environmentally-preferred alternative, meets criteria 1, 2, 3 and 4 of the Council on Environmental Quality regulations that implement the National Environmental Policy Act (NEPA), Section 101(b), and the National Park Service NEPA guidelines found in Director's Order 12.

## **Public Involvement and Agency Coordination**

Internal coordination between the National Park Service and the Navy involving fire management and resource specialists, for preparing the joint wildland fire management plan and environmental assessment began in February 2003. Park neighbors were briefed on the development of the fire management plan and environmental assessment at monthly Good Neighbors meetings, and agencies with land in the Point Loma Ecological Conservation Area, along with the US Fish and Wildlife Service liaison, were briefed at the bi-monthly Point Loma Ecological Conservation Area Work Group meetings.

It is the Navy's policy not to release environmental assessments for public review and to prepare the Finding of No Significant Impact (FONSI) upon completion of the EA and the plan/project whose impacts it analyzes. It is NPS policy, as stated in Director's Order 75 (Civic Engagement) and in Director's Order 12 (NEPA Guidelines), to release EAs for public review and comment. As a result, the Cabrillo NM served as the lead agency for the public review of the EA and JWFMP.

On Friday, July 21, 2006, Cabrillo NM mailed letters regarding the availability of the JWFMP/EA to 97 individuals, civic organizations, elected officials and agencies in the region, informing them of the date, time and location of the public meeting and requesting comments. The letter included a copy of the Executive Summary for the JWFMP and the Abstract for the EA, and included instructions for reading and/or downloading and printing copies of the JWFMP and EA on the Monument's website. Those who desired could request a hardcopy or CD of the JWFMP or EA. Park neighbors on Point Loma who received the letter included Fort Rosecrans National Cemetery, Department of Veterans Affairs, Metropolitan Wastewater Department, City of San Diego, U.S. Coast Guard, and several Navy commands. Letters were also sent to several conservation organizations, including the San Diego Chapter of the Audubon Society and San Diego Field Ornithologists, and the San Diego Chapter of the Sierra Club, members of the fire community, civic organizations, the California Native Plant Society, city and county departments

of parks and recreation, and the City of San Diego-sanctioned Peninsula Community Planning Board. Letters were also sent to the California State Historic Preservation Officer, the San Diego office of the California Coastal Commission, the Carlsbad office of the US Fish and Wildlife Service, Forest Supervisor, Cleveland National Forest, Regional Manager, California Department of Fish and Game, the regional superintendent of the California State Parks, and the 11 tribal leaders of the Federally-recognized Kumeyaay bands in San Diego County.

On July 25, 2006, the park issued a press release to over 200 local and regional media outlets to inform the public that the “Naval Base Point Loma and Cabrillo National Monument Joint Wildland Fire Management Plan” and its environmental assessment was available for public review and that a public meeting would be held on August 2 at the Point Loma Public Library to present the plan and answer questions. Copies of the 400 page document were placed in the neighborhood Ocean Beach and Point Loma public libraries and in the main public library in downtown San Diego. Copies of the JWFMP/EA that could be read and/or downloaded and printed were posted on the park’s website. Compact discs (CDs) containing the JWFMP/EA were available upon request at the park.

Approximately 10 hard copies of the EA were directly distributed to the public along with five CDs which contained the JWFMP and EA. Due to the JWFMP/EA having been posted on the Monument’s web page, which provided the public with the opportunity to download and print either document, it is difficult to determine how many additional copies of the EA were obtained by the public.

The public EA review and comment period was open for 35 days from July 21, 2006 through August 25, 2006. Upon request from the USFWS, this was extended through September 5.

Cabrillo NM received a letter from the U.S. Coast Guard, which stated that it had no objections to the JWFMP or EA. In its letter, the US Fish and Wildlife Service (FWS) made several recommendations or observations (two of which applied specifically to Navy land), including: describe brush management activities, including how much vegetative cover would remain after such activities are conducted, how much of the cover would consist of shrubs and/or forbs, and frequency of vegetation management, conduct vegetation management activities outside of the breeding bird season (February 15 – August 30), or that vegetation be surveyed in advance for nests, that sensitive plants in vegetation management areas be flagged so that they not be cut or shortened, that vegetation management upslope of the sites having Orcutt’s spineflower (*Chorizanthe orcuttiana*) be avoided or minimized, that removal of eucalyptus trees at Naval Base Point Loma occur outside the heron nesting season, that those with nests be allowed to remain in place, or not removed until replacement trees/heron rookery are established, and that more experimental burns be conducted and/or the plot size be enlarged (i.e. 50m x 50m); the FWS also offered assistance of its fire crew to conduct the experimental burns. Measures specific to the Monument are incorporated into the Mitigation Matrix (above).

The park received 39 email responses and three written responses from at-large members of the birding community, both locally and nationally, as well as the San Diego Audubon Society. These responses addressed the proposed creation of fuel management areas 10 ft out from the edge of public roads, and the effect such an action might have on a park area known as the Myoporum Grove. Point Loma is on the Pacific Flyway - each spring and fall this grove of predominantly exotic vegetation provides shelter, protection, food and a resting spot for native and migrating birds. As a result, it is a favorite site for bird watching. The respondents felt

habitat could be adversely affected if fuel management areas were established to the maximum degree mentioned in the JWFMP. The respondents suggested an exception to avoid adversely affecting the Myoporum Grove, and mentioned changes made due to removal of exotic vegetation over the past several years, and asked that future changes not be made in a manner that would destroy or irreparably damage the qualities that remain for birders to enjoy.

One Audubon Society response urged adoption of the Proposed Action and supported the proposal to conduct the research burns and encouraged the NPS and Navy to work with the San Diego Fire Recovery Network when planning them. It lauded the removal of exotic vegetation as part of fuel management along public roads and adjacent to buildings, but urged the NPS to minimize vegetation management along paved walks and less-used public roads.

Respondents also endorsed the recommended combined use of fire-resistant building materials with the creation of survivable/defensible space and urged the NPS to relocate minor structures to locations with other buildings to reduce the impacts to vegetation due to fuel management.

The park received two responses from recognized members of the southern California fire community. One stated that it was critical that the research burns be conducted (and it was suggested the plots be fenced to prevent herbivory by rabbits from killing any seedlings that would appear). Conversely, the other respondent thought the JWFMP leaned more toward introducing prescribed fire into the coastal Mediterranean habitats than might be warranted by certain scientific evidence (whether research burns would provide any significant new information to support Cabrillo NM use of prescribed burning was questioned). It was contended that the current fire-free interval may be natural, and that introducing more frequent fires under a prescribed fire program would risk compromising existing maritime chaparral and succulent scrub plant communities. It was suggested that the plan facilitate preservation of the old-growth stands of chaparral that may have once existed on Point Loma, and that one-meter square burns using burn boxes be used to learn what plants were in the seed bank (rather than the proposed 30m x 30 m plots).

All of the email and written responses which were received were carefully considered in arriving at the decision to select the Proposed Action. None of the comments raised issues not already fully considered in the preparation of the EA and JWFMP.

## **Non-Impairment of Park Resources and Values**

The implementation of the Selected Action will not violate the National Park Service Organic Act nor impair park resources or values. The impacts documented in the environmental assessment and summarized above will not affect resources or values key to the natural and cultural integrity of the park or alter opportunities for enjoyment of the park. This conclusion is based on a thorough analysis of the impacts described in the environmental assessment, the nature of agency and public comments received, and the professional judgment of the decision-maker in accordance with National Park Service Management Policies (2006). As described in the environmental assessment, implementation of the Selected Action will not result in significant adverse, long-term impacts to a resource or value whose conservation is (1) necessary to fulfill specific purposes identified in the 1913 presidential proclamation that established Cabrillo NM, (2) key to the natural or cultural integrity of the park, or (3) identified as a goal in the monument's 1996 general management plan or other relevant NPS planning documents.

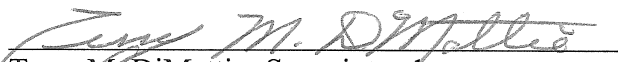
## Conclusion and Basis for Determination

Based on the analysis completed in the environmental assessment, the capability of the mitigation measures to reduce, avoid or eliminate the minor impacts identified in the EA, and with due consideration of the minimal public and agency comments, the National Park Service (in consultation with the Navy) has determined that the Selected Action does not constitute a major federal action significantly affecting the quality of the human environment nor is it one that would normally require the preparation of an environmental impact statement.

The Selected Action would help ensure the protection of the public and the contemporary and historic resources, while furthering the perpetuation of native terrestrial habitats, fire-adapted plant communities and rare species, and minimizing the cost of pre-suppression and fire suppression activities on Monument lands within the Federal reservation on Point Loma. There are no significant or major, long-term impacts to Monument operations or land use, utilities and infrastructure, socioeconomics, recreation and scenic values, visitor education and outreach, public health and safety, cultural or historic resources, topography and soils, water resources, native plant communities and sensitive plants, wildlife populations and sensitive wildlife, or air quality.

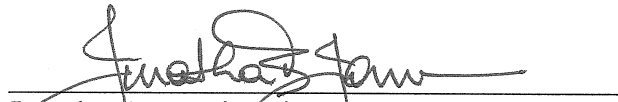
There are no highly uncertain or controversial impacts, unique or unknown risks, significant cumulative effects, or elements of precedence identified. Implementing the Selected Action would not violate any Federal, state or local environmental protection law as may be applicable to the Monument. Therefore, in accord with the National Environmental Policy Act of 1969, and regulations of the Council on Environmental Quality, an environmental impact statement will not be prepared for this project and the Selected Action may be implemented as soon as practicable.

### Recommended:

  
Terry M. DiMattio, Superintendent  
Cabrillo National Monument

12-18-06  
Date

### Approved:

  
Jonathan B. Jarvis, Director  
Pacific West Region, National Park Service

12/21/06  
Date