



# ***Finding of No Significant Impact***

## **Sequoia & Kings Canyon National Parks**

**Approved: November 13, 2003  
Final Printing: January 2004**



## **Finding of No Significant Impact (FONSI) for Fire and Fuels Management Plan Sequoia & Kings Canyon National Parks November 13, 2003**

### **PURPOSE AND NEED**

Wildland fire has long been recognized as one of the most significant natural processes operating within and shaping Sierra Nevada ecosystems. Virtually all vegetation communities show evidence of fire dependence or tolerance. Many forest types in the parks have short to moderate natural fire return intervals (6- 17 years) as evidenced by extensive research. At the same time wildland fire has the potential to threaten human lives and property. Consequently there is a need to manage wildland fire to provide for public and firefighter safety while restoring and maintaining desired resource conditions and natural processes.

The proposed action will respond to three primary fire and fuels management goals:

**1. Protect and restore the parks' ecological, cultural, and social values.**

Resource values include: vegetation, water, wildlife, natural processes, and air resources, along with prehistoric and historic cultural sites, historic structures, and contemporary structures, both government- owned and private. Social values include protecting park employees, visitors and neighboring communities, and providing for recreational opportunities including wilderness experiences.

**2. Reduce fire hazards in park ecosystems.**

Fire hazard is defined as those attributes that affect the ability to control fires, or contribute to extreme fire behavior. There is only one attribute of fire hazard, *fuel conditions* (amount, arrangement, and continuity), that can be effectively altered by management. None of the other elements that contribute to hazardous fire conditions, such as steep slopes and the amount of solar radiation heating fuels and drying vegetation, can be effectively changed by management actions.

**3. Reduce risk of unwanted wildland fire.**

Risk is defined as the probability of new fire starts, whether by human or natural ignition (lightning). Since lightning ignition risk is outside the realm of management control, the focus of risk management in the fire program is to reduce the probability of unwanted human ignitions through a program of education, detection, and pro- active fuels management.

## **SELECTED PROGRAM-ALTERNATIVE 4: MULTI-STRATEGY**

The proposed action as detailed in the underlying environmental analysis has been selected. This action appears to most fully balance park objectives with issues of concern, and is also the environmentally preferred alternative. This proposed action applies a full range of fire management tools: wildland fire suppression (suppression of unwanted ignitions), wildland fire use (managing some lightning ignitions to achieve natural resource benefits), prescribed fire (management- ignited fires), and mechanical fuel reduction.

The primary actions and program elements are:

- Up to 15 mechanical fuel reduction projects per year. Individual project size typically 30 acres.
- Up to 15 prescribed fire projects per year. Individual project size 8,000 acre maximum. Total prescribed fire acres not to exceed maximum expected under natural fire regime.
- Up to 40 wildland fire use projects per year. Individual project size could be up to 20,000 acres, but 90% would be less than 0.1 acre.
- An unknown number of wildland fire suppression actions per acre. Individual project size could be any size.

There were no modifications based on public comment or agency consult.

The minimum tool in wilderness includes such motorized equipment as chainsaws, fire pumps, generators, and computers. There will be limited support by helicopter. Field crews, supplies, and materials transported by ground except when infeasible due to trail conditions, weather conditions, or unavailability of stock or when moving large, fragile, or time- sensitive items that cannot be practically transported otherwise. The minimum tool is more fully described in Table H- 1 of the EA.

The new plan will remain in force subject to minor annual and extensive five- year review until superseded by a subsequent plan.

## **Other Alternatives Considered**

Five other alternatives were evaluated –

- **Alternative 1: No Action (Current Program)** – Continue the current direction and accomplishments of the fire management program that has been in place since 1968, including a revision written in 1989. This alternative would utilize the full range of fire management strategies, including prescribed fire, fire use, mechanical treatments, and fire suppression activities where appropriate. The alternative was not selected since the level of fuels treatment proposed would not allow for achieving natural resource and fire management goals over a significant enough area of the parks.
- **Alternative 2: Prescribed Fire Dominated** – Program would focus on the intentional use of fire through the application of prescribed fire to accomplish hazard fuel and resource management goals. The alternative was not selected since natural resource and fire management goals would not be met.
- **Alternative 3: Wildland Fire Use Dominated** – Program would focus on managing unplanned fires to accomplish hazard fuel and resource management goals. The alternative was not selected for the same reason as Alternative 2.

- **Alternative 5: Mechanical Fuel Reduction Dominated** – Program would focus on the intentional use of mechanical treatment methods to accomplish hazard fuels and resource management goals. This alternative was rejected from in- depth consideration since it cannot meet the goals due to the large percentage of the parks designated and proposed as wilderness.
- **Alternative 6: Wildland Fire Suppression Dominated** – Program would focus on the suppression of wildland fires. This alternative was rejected from in- depth consideration since it cannot meet hazard fuel and resource management goals.

## **ENVIRONMENTALLY PREFERRED ALTERNATIVE**

The proposed action is the environmentally preferred alternative. It has the best opportunity of protecting, preserving, and enhancing the parks’ natural and cultural resources. Alternative 4 proposes levels of fire management activity for the next five years that will result in meaningful restoration and maintenance of fire as a natural process in park ecosystems while protecting social values.

## **PUBLIC REVIEW AND CONSULTATION**

A Scoping Notice was placed in the Federal Register on February 24, 1999 and a press release regarding the planning effort was sent to media outlets in the region.

In 1999, park staff hosted a series of scoping meetings:

### **Internal**

- Sequoia National Park (Red Fir Maintenance Facility)  
February 17, 1999 – 4 people attended
- Kings Canyon National Park (Grant Grove)  
February 18, 1999 – 9 people attended

### **Public**

- Fresno (Ft. Miller Middle School)  
March 3, 1999 – 2 people attended
- Visalia (Tulare County Office of Education)  
March 10, 1999 – 6 people attended
- Los Angeles (Visitor Center Auditorium in Griffith Park)  
March 15, 1999 – 3 people attended
- San Francisco (Golden Gate National Recreation Area, Presidio Visitor Center)  
March 22, 1999 – 7 people attended
- Three Rivers (Three Rivers Union School)  
March 23, 1999 – 24 people attended

### **Interagency**

- Southern Sierra Fire Management Officers  
March 30, 1999 – line officers for Inyo, Stanislaus, Sequoia, and Sierra National Forests

### **Special Interest Groups**

- Native American Tribes – Park archeologist held consultation meetings in July of 1999 with a variety of Native American (American Indian) tribal groups and individuals. These meetings were held on both sides of the Sierra Nevada in areas from which Native American groups historically accessed and used lands now part of Sequoia and Kings

Canyon National Parks. Information was received from eight separate groups regarding their past and present uses of the parks, with a total of 33 individuals being interviewed.

- Mineral King Cabin Owners Association
- Friends of the South Fork Kings River

These sessions indicated strong support for actions that lead to better fire protection for park communities and developments, as well as for actions leading to the restoration and maintenance of more natural resource condition and function. Appendix C of the *Environmental Assessment* (EA) details all comments and park responses from the scoping meetings. Comments are categorized in the following groups: desired future conditions, aesthetics, cost, air quality, logging, information/education, fire effects, hazard, human- caused fires, lightning fires, planning, public health, safety, prescribed fires, and science.

The parks distributed information about the public comment period in a press release dated April 12, 2003. The press release was faxed to 45 cooperators, organizations, and media outlets, and emailed to an additional 400 employees, businesses, agencies, media outlets, and local residents. The parks sent a direct mailing with the press release and a special summary brochure to people who had expressed an interest in the planning process. This list included 148 citizens, businesses, federal agencies, special interest groups, politicians, schools, state agencies, and tribal members. The public comment period was from April 16 to May 31, 2003.

During the public comment period, the documents were available on the park website. Nine people requested hard copies and two people requested CD- ROM versions of the documents. The parks also hosted two public meetings during the public comment period:

- Visalia (Tulare County Office of Education)  
May 13, 2003 – 0 people attended
- Three Rivers (Three Rivers Union School Gym)  
May 14, 2003 – 11 people attended

The U.S. Fish and Wildlife Service was consulted regarding potential impacts to special status species. Written concurrence was obtained on August 12, 2003. The park Superintendent initiated consultation with the State Historic Preservation Office (SHPO) through a letter dated July 17, 2003. This consultation is necessary for Section 106 compliance under the National Historic Preservation Act. Written comments from SHPO were not received.

## **SUMMARY OF COMMENTS**

A total of nine written comments were received on the proposal (three via U.S. mail and six via e- mail). The National Parks Conservation Association, San Joaquin Valley Unified Air Pollution Control District, California Air Resource Board, Sequoia Lake Conference of YMCAs, and U.S. Fish and Wildlife Service all provided comments. Other comments were from individual residents of neighboring communities.

All comments support the proposed action and can be found in the administrative record open to public review. None of the comments raised substantive issues or concerns not already covered in the EA. Reviewers generally sought clarification of information outlined in the companion *Fire and Fuels Management Plan*. Clarification is provided below.

## Primary Issues and Questions Raised

1. Respondent questioned whether proposed action would negatively effect the Valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*).

Park response:

Only 25 acres of annual mechanical or prescribed fire treatment are planned in potential beetle habitat, all of which lies below 3000'. A survey of the planned treatment area (in the vicinity of Ash Mountain) documented the presence of two elderberry (*Sambucus mexicana*) shrubs. These will be protected from mechanical and prescribed fire treatment. Pre- and post- burn fire effects monitoring will document any additional shrubs that might need protection.

2. Respondents expressed a desire for increased prescribed fire and wildland fire use treatments while recognizing the complexity of managing a fire management program with constraints of funding, personnel, safety, and air quality.

Park response:

The proposed action is the parks' attempt to balance natural resource goals and social goals while recognizing additional values of concern to society. Funding levels, air quality management, and safety prevent a dramatic increase in the fire and fuels management program. The parks believe that the proposed action is a fair representation of what can be accomplished safely and within outlined goals.

3. Respondent asked that the parks conduct adequate monitoring and research when required to document effects of fire activities on plants and animals.

Park response:

Chapter 3 of the *Fire and Fuels Management Plan* outlines the parks' monitoring and research program, with further information contained in Appendices C and D respectively. National Park Service policy requires monitoring of fire management actions upon affected park resources and a yearly budget is provided to address a portion of this workload. Research needs are often identified through monitoring. Money is made available through a competitive process with other Park Service or Department of Interior units.

4. Respondent asked that the parks annually reassess the fuels treatment analysis so that recent fires are incorporated into future analysis.

Park response:

Each year the parks update geographic information system (GIS) databases and rerun fuels treatment analyses. Such adaptive management allows park staff to reassess treatment needs based upon all wildland fire activities.

5. Respondent questioned treatment of wildland urban interface areas when significant portions of the parks' natural areas may be in need of more important treatment.

Park response:

The GIS analysis employed to choose treatment areas combines input from many data sources, one of which is the presence of structures. It is not the only factor considered. The park believes the analysis justifies mechanical treatment surrounding structures in concert with large portions of the park treated through a combination of prescribed fire and wildland fire use. The treatment types complement one another given the values protected or enhanced.

6. Respondent asked that the parks provide additional information for the public and the San Joaquin Unified Air Pollution Control District (the air district) under the Plan's Chapter 3, Tool #4 - Prescribed Fire on project implementation and post-fire follow through. Clarification regarding what public notification entails, providing daily fuels treatment accomplishments, and reporting of final accomplishment acres were all mentioned.

Park response:

The parks concur with the editing of the Plan. All activities the respondent mentioned are already undertaken but will be more clearly described in Chapter 3 of the Plan.

7. Respondent supports the wildland fire management goals and objectives as displayed in the EA and Plan. He asks that the parks provide mitigation for air quality impacts on Three Rivers, California residents from burning that occurs in the East Fork and Middle Fork Kaweah drainages.

Park response:

Mitigation measures are described in the attached matrix and the Plan. The annual planning process for treatment activities considers both the number of prescribed fires per drainage per year, and the duration of prescribed fires. This information is more fully displayed in the Plan.

8. Respondent requests that the parks account for PM<sub>10</sub> emissions from activities associated with the Plan, such as soil disturbance from mechanical treatment and unpaved road use, or mechanical equipment such as chainsaws.

Park response:

The use of mechanical equipment will be primarily confined to chainsaws coupled with hand piling of woody debris. Negligible air quality effects from such activities will occur. Given an average of 45 acres of handpiling per year with an emission factor for chainsaws of 7.7 grams/horsepower-hour, only 0.02 tons/year of PM<sub>10</sub> would be generated based upon an average 700 hours of chainsaw use per year. Should extensive mechanical treatment activities using additional equipment occur on parklands, additional environmental analysis will be necessary to analyze alternatives and document effects. Also, limited unpaved roads exist in the parks (approximately 10 miles). Using an average of 5 days per burn and 7 vehicles per day traveling on 5 miles of unpaved road surface yields a total unpaved road use of 175 miles per year. Multiplying times the emission factor for unpaved roads of 2.27 lbs PM<sub>10</sub> per mile traveled, an estimated total PM<sub>10</sub> load from unpaved roads of 0.20 tons per year is derived.

9. Respondent asks that the parks include PM<sub>2.5</sub> and ozone in the public notification process for full information disclosure.

Park response:

The parks currently have a fully functional air advisory program that is based on ozone, and is managed separately from the fire management program since fire is not a significant contributor to ozone pollution. The information displayed in the Plan relates to PM<sub>10</sub> associated with smoke management from the fire management program. The parks do collect data on PM<sub>10</sub>, and will continue to do so with upgrades to equipment planned. The parks will actively seek cooperative efforts for information collection and sharing with the District.

As for PM<sub>2.5</sub>, once standards have been set by the District, the parks will work to achieve them which will involve tracking PM<sub>2.5</sub> levels and sharing information with the public.

10. Respondent states that the PM<sub>10</sub> emission reduction timeframe used in the EA analysis does not coincide with the attainment timeframes the District must follow under the Clean Air Act.

Park response:

The emissions the parks are proposing are well within the emissions inventory data submitted to the district previously (a five- fold increase), and that then triggered District prescribed burning fees (rule 3160) and increased oversight and regulation (Rule 4106). As has been described previously, the program has never achieved the levels that were put in the emissions inventory to cover the parks in the future, nor would the preferred alternative approach the inventory levels. What is described in the Plan and analyzed in the EA is well within the emissions inventory numbers and not anything new.

In addition, since the District approves prescribed fires and wildland fire use fires on a project by project basis, the District, to a certain extent, has input into the exceedences. By the parks attempting to follow the rules mentioned above, striving to adhere to the air district's smoke management plan, and following the parks' smoke management plan, the park is implementing best available control measures (BACM). The parks will continue to work to meet standards by following the processes and procedures set up by the District and the parks. When standards are updated by the District, the parks will work to update BACM and strive to be in compliance with those standards.

11. Respondent states the EA does not take into consideration a cumulative increase in emissions throughout the Sierra Nevada nor does it address conformity.

Park response:

The proposed expansion in emissions from all agencies was included in the District's draft PM<sub>10</sub> implementation plan. The parks have never achieved, nor would the Plan exceed, that inventory number. Therefore, the parks have incorporated cumulative effects by staying well within inventory numbers.

Also, cumulative effects are still on an event by event basis, which the District is involved with. The parks are addressing both cumulative impacts and conformity by: 1) working with



the District's smoke management plan and regulations, 2) adhering to the parks' smoke management plan, and 3) working with the District and neighboring wildland fire management agencies under the draft smoke management memorandum of understanding and associated work plan.

**12. Respondent asks that the parks define mechanical equipment and a diameter at breast height (dbh) limit for harvest.**

Park response:

Mechanical equipment can be loosely defined as any machinery the parks might use to help with the cutting and removal of vegetation to meet resource management goals and objectives. This loose definition would include weed whackers, chainsaws, dozers, rubber tired skidders, chippers, etc. For this EA and Plan the majority of mechanical treatment would be undertaken using weed whackers or chainsaws. Most forest vegetation will be cut and piled for later burning.

Should the parks identify through monitoring that resource management goals or structure protection goals in the wildland urban interface are not being met, additional mechanical treatment may be necessary. Extensive treatment would require further environmental analysis or may be covered under the Healthy Forests Initiative Act.

In regards to dbh limits, proposed work may involve cutting some trees no greater than 40 feet high and then burning and/or chipping associated debris on site. Trees up to 40 feet high typically have diameters less than 14" at dbh. Structural reconstructions of mixed conifer forest in the Sierra Nevada indicate that many of those trees are artifacts of post-settlement fire suppression and are at unnaturally high densities in untreated forests. The proposal to remove some trees in the 40-foot high size class would move the sites towards more natural forest structure and reduce ladder fuels conditions conducive to crown fire. Specifications for forest structure objectives are outlined in Appendix C of the Plan.

**13. Respondent asks that fuels on and near their boundary with parklands be a high priority for treatment and that any prescribed fire activities in their vicinity give consideration to effects on users of their lands.**

Park response:

The existing GIS analysis for fuels treatment needs, as well as future analyses, gives consideration to wildland urban interface communities. Therefore, such communities will always be considered as treatments are planned. Consultation with residents in these communities will continue to be an avenue that the parks develop. The timing of any prescribed fire near communities represents one of the activities requiring consultation. Where feasible, the parks will adjust the timing of burns to accommodate neighbors. This respondent is a neighbor who would prefer spring and fall burns. The air district prefers the parks to burn in spring or summer, not fall, due to particulate loads generated in the San Joaquin Valley during the fall and the stable meteorology conditions which lead to poor air dispersal. The parks will continue to communicate with the air district and any affected communities to find the best solution that works for everyone.

## MITIGATION MEASURES INTEGRATED INTO THE MULTI-STRATEGY ALTERNATIVE

None of the comments received raised substantive issues or concerns not already covered in the EA. As a result, no changes have been made to the proposed action. Comments did result in editorial changes to the *Fire and Fuels Management Plan* as described in this FONSI. The parks' general management plan will supercede the Plan in the event of any conflicts. Any future fire management actions not fully analyzed in the EA and articulated in the Plan will not be implemented without additional environmental analysis.

### Impact Mitigation Matrix for the Preferred Alternative

Resource Value	Mitigation	Responsible Party
Special Status Species	Implementation of mechanical or prescribed fire treatments in the Ash Mountain area may affect valley elderberry longhorn beetle. Survey of the burn area documented the presence of two elderberry plants which could serve as hosts for beetle larvae. These plants will be protected from fire. Pre- and post-fire effects monitoring will be conducted to assess for the presence of additional elderberry plants.	Fire Ecologist
Non-native/invasive species	Fire effects staff survey vegetation plots located in burn units as part of the monitoring program. Presence of non-native/invasive plants would be noted. Fire effects monitoring data is analyzed and shared with fire and resource management staff annually allowing for program adjustment.	Fire Ecologist
Air	The parks have a smoke management plan in place. This plan is considered best available control measures (BACM) by the air district. The parks work to adhere to the air district's smoke management plan for PM10 under Rules 4106 and 3160. The air district has input into decisions for igniting or allowing all prescribed fire and wildland fire use actions. The parks vigorously strive to comply with the requests of the air district.	Fire Management Officer
Health and Safety	<p>Through yearly fuels management planning the parks' prescribed fire targets may be adjusted to plan for no more than two prescribed fire projects per year per fire management unit, while also attempting to limit project duration to no more than 14 days per burn. In addition, wildland fire use or suppression starts which burn park acreage (over 100 acres) in a fire management unit may factor into the decision to implement a planned prescribed fire in the same fire management unit that year.</p> <p>Implementation of fire management actions will be carefully planned and conducted with full consideration of public safety. Project areas will be closed by the District Ranger for short duration to provide for safety during fire operations. Closures will be coordinated through the District Ranger, and private inholdings as appropriate.</p> <p>Firefighter safety will be high priority and will be stressed through adherence to the standard firefighting orders and the use of full personal protective equipment at all times.</p> <p>A job hazard analysis will be conducted prior to any work, and all usual and customary safety practices will be implemented to ensure safety of workers.</p>	Fire Management Officer
Wilderness	All minimum requirement/minimum tool procedures and standards will be followed, as documented in the EA. Conditions	Fire Management

	created through following the fire management plan will result in more natural conditions in the wilderness.	Officer & Natural Resource Management Specialist
Recreation	Project areas may be closed by the District Ranger as necessary to facilitate safe operations and protect visitors. Closures will be in effect for the minimum amount of time necessary for safe operations. Consideration will be given to prime visitor use periods. Information will be distributed to employees, visitors, media, local communities, agency partners, and businesses.  Areas will be restored to more natural appearance and function, enhancing the recreational experience.	Fire Information & Education Specialist, District Fire Management Officers
Cultural/Historic	The parks' archeologist will monitor ground-disturbing activity. Park staff overseeing projects will be trained to identify potential resources encountered. Any cultural resources detected will be avoided or fully mitigated to standards established by the park archeologist prior to work continuing.	Park Archeologist

## **DECISION RATIONALE—WHY THE SELECTED PROGRAM WILL NOT SIGNIFICANTLY HARM PARK RESOURCES AND VALUES**

- 1) *Impacts that may have both beneficial and adverse aspects and which on balance may be beneficial but that may still have significant adverse impacts.*

Short- term adverse impacts to recreational use, wilderness character, natural quiet, air quality, and tourism may occur during implementation of the project. The long term safety and ecological benefits of the proposed work significantly outweigh short- term impacts.

- 2) *Effects on public health and safety.*

As noted in the EA, short- term impacts to air quality may occur to visitors and residents in the immediate area. Air quality effects will be mitigated through consideration of the number of fires per drainage per year, as well as duration of fires. Also, air quality effects will be mitigated through timing of ignitions so as to minimize the number of people exposed to smoke, and through advance notice of burning to residents so they may chose to avoid being in the area during the burn period. In addition, through consultation with the District and neighboring land management agencies, the number of ignitions occurring simultaneously will be controlled. The positive long- term effects of the project will result in a significant increase in the health and safety of residents, visitors, and firefighters through proactive management of an identified hazardous situation.

- 3) *Unique characteristics of the area.*

The project will directly restore park areas to more natural conditions. Eligible cultural landscape elements would not be affected by the project. Unknown cultural resources discovered during the project will be protected. Wilderness values will be enhanced.

- 4) *Degree to which impacts are likely to be highly controversial.*

Cutting trees in national parks always has some element of controversy. The level of mechanical treatment in the proposed action has received strong support from most reviewers and residents. The proposed action conforms to the direction provided in the 2001 National Fire Plan to protect communities and restore ecosystems – a direction that enjoys broad public support.

Air quality effects on local communities can be controversial, depending upon the proximity of wildland fires to smoke sensitive locations. The parks try to mitigate smoke effects on communities by following pre-planned operational procedures. These procedures are coordinated with the air district.

No comments were received that were critical of the project in relation to wilderness values.

- 5) *The degree to which the potential impacts are highly uncertain or involve unique or uncertain risks.*

The operational procedures detailed in the Plan ensure that the outcomes of the work and their impacts are reasonably certain. There are no known unique or uncertain risks.

- 6) *Whether the action may establish a precedent for future actions with significant effects, or represents a decision in principle about a future consideration.*

There is adequate evidence that the wildland fire and mechanical tools employed in the Plan and analyzed in the EA will accomplish the goals and objectives of the Plan and lead to restoration and maintenance of more natural conditions. Because of these findings, it is not expected that this project will set a precedent for other park fire management actions that do not otherwise contain the same conditions, benefits, and opportunities as the proposed action.

- 7) *Whether the action is related to other actions that may have individual insignificant impacts but collectively significant impacts.*

The proposed work has intrinsic ecological and safety benefits as proposed and may be completed without linked actions. It is expected that the proposed action will allow the implementation of fire management treatments – including the use of prescribed and wildland fire use – that will have great benefit to the resource.

- 8) *The degree to which the action may adversely affect historic properties or other significant scientific, archeological, or cultural resources.*

The park cultural resource staff has reviewed the proposed work and has determined that the project would not have any adverse effect on known cultural resources.

- 9) *The degree to which the action may adversely affect an endangered or threatened species or its habitat.*

Park subject matter experts have reviewed the project and determined that the project would not have any adverse affect on any listed species or their habitat. United States Fish

and Wildlife Service subject matter experts have reviewed the EA and Plan and have issued concurrence with the documents providing mitigation measures occur on one prescribed fire project below 3000' elevation in support of valley elderberry longhorn beetle (*Desmocerus californicus dimorphus*) habitat.

- 10) *Whether the action threatens a violation of federal, state, or local law or requirements imposed for the protection of the environment.*

The proposed action conforms to all existing law and policy.

- 11) To achieve the goals as disclosed in the EA, the proposed action must manage fire parkwide. Since most of the parks are in the Sequoia- Kings Canyon Wilderness, it is necessary to bring fire and fire management activities into that wilderness. In order to carry out those actions that are defined as the minimum requirement for managing that wilderness, park managers identified the management method (tool) that would cause the least amount of impact to the physical resources and experiential qualities (character) of wilderness. For the purposes of analysis, three alternative approaches to minimum tool application were developed. The selected alternative became the approved minimum tool approach. The minimum tool analysis is more fully described in Appendix H of the EA.
- 12) The program does not conflict with planned fire management activities on neighboring United States Forest Service lands. Rather, the activities are expected to be consistent and complementary, resulting in beneficial cumulative impacts. The Inyo, Sequoia, and Sierra National Forests have rewritten, or are rewriting, their respective fire management plans. Their plans will all allow for wildland fire use activity. Depending upon the amount of acres treated through wildland fire use, a greater percentage of Southern Sierra vegetation and associated fire regimes could be restored or maintained, with decreased risk of catastrophic loss to vegetation associations. Wildland fire use could allow this restoration or maintenance to occur across agency boundaries in wilderness areas.

In summary, the proposed action best meets the three goals as disclosed in the EA and repeated at the beginning of this FONSI.

The No Action Alternative is acceptable but would not fully meet the goals at a landscape scale. The No Action Alternative was not selected because it was not the environmentally preferred alternative. Its principal environmental shortcoming is that it focuses on small areas of the parks rather than adequately addressing degraded natural resource conditions across a majority of the parks.

All short term negative effects of the proposed action are outweighed by the long term benefits derived from the proposed action.

## **IMPAIRMENT DISCLOSURE**

Under the National Park Service (NPS) Organic Act and the General Authorities Act, as amended, the NPS may not allow the impairment of park resources and values except as authorized specifically by Congress (*NPS Director's Order 55*). Impairment is an impact that, in the professional judgement of the responsible NPS manager, would harm the integrity of park

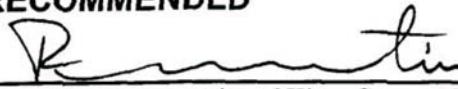
resources or values, including the opportunities that otherwise would be present for the enjoyment of those resources or values. Park managers have examined each potential impact of the preferred alternative and determined that the combination of actions provided for in this environmental assessment will not result in the impairment of any park resources or values.

## DETERMINATION

Implementation of the proposed action represents the best course of action to resolve the need to provide for public and firefighter safety while restoring desired resource condition. The proposed action maximizes flexibility in meeting critical goals while adopting the best available control measures for managing the effects of smoke on public health, and complying fully with Clean Air Act requirements along with other applicable laws and policies.

Based on the environmental impact analysis as documented in the environmental assessment and the capacity of the mitigation measures to avoid, reduce, or eliminate potential impacts, and with due consideration of the nature of public response, the NPS has determined that the proposal is not a major federal action which will significantly affect the quality of the human environment. There are no adverse cumulative or indirect effects foreseen or predicted, and the proposal would not establish precedent for any future actions. No connected actions with potential significant effects were identified. The few potential impacts foreseen through the environmental impact analysis are all short term with little consequence to any resource or social concern. Transitory effects on social values such as recreational use, wilderness character, natural quiet, air quality, and tourism are outweighed by the long term benefit derived from reducing unnatural ecological conditions and hastening the recovery of natural processes. Therefore an Environmental Impact Statement will not be prepared and the proposal will be implemented as soon as practical.

### RECOMMENDED

  
\_\_\_\_\_  
Superintendent, Sequoia and Kings Canyon National Parks

10/3/03  
\_\_\_\_\_  
Date

### APPROVED

  
\_\_\_\_\_  
Regional Director, Pacific West Region

11/13/03  
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Date