



# United States Department of the Interior

NATIONAL PARK SERVICE  
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Atlanta, Georgia 30303

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## Memorandum

To: Superintendent, Cape Hatteras National Seashore

From: Regional Director, Southeast Region *Patricia A. ...*

Subject: Finding of No Significant Impact – Environmental Assessment for the Outer Banks Group Fire Management Plan

Enclosed please find the signed Finding of No Significant Impact for the Environmental Assessment for the Outer Banks Group Fire Management Plan

If you require further assistance or information, please contact Chief, Planning and Compliance Division, at 404-562-3124.

Enclosure

|   |                  |                    |
|---|------------------|--------------------|
|   | SUPERINTENDENT   |                    |
| ✓ | DEPUTY SUPT.     | <i>[Signature]</i> |
| ✓ | PIO/PLANNING     |                    |
|   | RESOURCE MGMT.   |                    |
| ✓ | INTERPRETATION   |                    |
|   | ADMINISTRATION   |                    |
|   | PERSONNEL        |                    |
| ✓ | VISITOR SERVICES |                    |
| ✓ | SAFETY OFFICER   |                    |
| ✓ | SPEC. PARK USES  |                    |
| ✓ | MAINTENANCE      |                    |
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## FINDING OF NO SIGNIFICANT IMPACT

### Environmental Assessment For Fire Management Plan Outer Banks Group North Carolina

#### DESCRIPTION

The Outer Banks Group is located in Dare and Hyde Counties, along the Outer Banks of North Carolina and extends for over 90 miles on Roanoke, Bodie, Hatteras and Ocracoke Islands. Part of the barrier island chain that fringes the East and Gulf coasts of the United States, the islands are narrow, typically less than one-mile wide, and are bordered on the west by the Pamlico Sound, which forms the largest estuarine system on the East Coast. The Group is composed of Cape Hatteras National Seashore, Wright Brothers National Memorial, and Fort Raleigh National Historic Site.

Cape Hatteras National Seashore contains about 30,318 acres of dry and submerged land. The national seashore is recognized for its natural, historical, and recreational values, including its beaches, excellent fishing, diverse bird life, and historic landmarks.

Wright Brothers National Memorial contains approximately 421 acres and is located on Bodie Island north of the Seashore within the corporate boundaries of Kill Devil Hills, North Carolina.

The 372-acre Ft. Raleigh National Historic Site unit is located on the northern tip of Roanoke Island.

The United States Fish and Wildlife Service (FWS) administers Pea Island National Wildlife Refuge, which is within the boundaries of the national seashore.

National Park Service (NPS) Directors Order # 18, Wildland Fire Management (November 1998) and Reference Manual # 18, (February 1999) require that all NPS areas with vegetation capable of supporting fire develop a Fire Management Plan (FMP). The use of fire to achieve resource management objectives is addressed in the Resource Management Plans for Cape Hatteras National Seashore and Wright Brothers National Memorial. The FMP implements the selected management actions from the appropriate Resource Management Plan. The purpose of the FMP is to outline in as detailed a manner as possible, actions that will be taken by the Outer Banks Group (Group) in meeting the fire management goals established for the area.

The Environmental Assessment (EA) for the FMP describes the issues relating to fire for topics such as: natural and cultural resources, human use, and values to be protected. Fire Management and the park goals for this management are described in four alternatives.

## ALTERNATIVES CONSIDERED

The focus of the EA was the choice between institution of a prescribed fire program and continuance of the policy to aggressively suppress all fires regardless of origin. **The no action alternative (Alternative A)** would result in the suppression of all fires and prescribed fire would not be used as a management tool to accomplish the resource management objectives of the park. The park would continue to use minimum impact suppression tactics and cooperation with fire departments around the park. Mechanical hazard fuel reduction to achieve resource management pre-suppression would be used on a very limited basis

Under **Alternative B – Mechanical Fuel Reduction: Suppress all wildland fires and implement an aggressive mechanical hazard fuel reduction program followed up with a limited management ignited prescribed fire initiative.** Under this alternative, wildland fires would receive an appropriate management response with the same control objectives described in Alternative A. The key component of this alternative would be an aggressive mechanical fuel reduction program during the first 3 to 5 years. This would be followed by a limited management ignited prescribed fire program to maintain fuel breaks and achieve limited resource management objectives.

Under **Alternative D – Full Use: Use the full range of fire management options available for fire suppression, ecosystem restoration, and hazard fuel reduction.** Under this alternative, wildland fires would receive an appropriate management response with the same control objectives described in Alternative A. This alternative would also apply the use of an ecosystem restoration element. In the case of a naturally caused fire (lightning strike), the park would use the appropriate management response based on prescriptive parameters that consider potential benefits to resources from fire.

## SELECTED ALTERNATIVE

**Alternative C: Suppress all wildland fires and use management ignited prescribed fire or mechanical means to achieve resource management objectives.** Mechanical hazard fuel reduction and management ignited prescribed fire will be used to reduce accumulations of hazard fuels around cultural sites, developed areas, and near park boundaries, to reduce the likelihood of wildland fire negatively impacting a park's resources or spreading onto other public and private lands.

The selected alternative is the environmentally preferred alternative due to the blend of mechanical fuel reduction and the minimal use of prescribed burns. This will remain the environmentally preferred alternative until the fuels are reduced to more manageable levels. At that point, the environmentally preferred alternative would then be one that includes suppression, mechanical hazard fuel reduction and prescribed fire to manage hazard fuels and achieve other resource management objectives (Alternative C). While Alternative D has these basic actions, Alternative C also has a focus of ecosystem restoration actions indirectly related to wildfire management

## **Compliance**

The park has worked with the FWS in the development of the FMP and has determined that no actions of the FMP effect endangered species. However, individual management actions and prescribed burn plans will be evaluated prior to field activity to avoid impacts. Based on existing ecological data, Alternative C will provide the best means of restoring and protecting vegetative communities necessary for the survival of habitats and species.

The concurrence of the State Historic Preservation Officer (SHPO) will be obtained during the planning phase of each prescribed burn or mechanical fuel reduction project. The greatest threat to cultural resources is a large-scale, high intensity wildland fire that could lead to the loss of historic structures. Alternative C will reduce the threat to these resources from wildland fires.

## **Public Health and Safety**

The selected alternative best protects residents and visitors to the Outer Banks and enhances their quality of life in the long term because the risk of large catastrophic fires is reduced and the natural scene is enhanced to more truly represent conditions that previously existed. Each park prescribed burn plan will contain standards for the numbers and qualifications of fire fighters needed for the burn. No prescribed fire will be undertaken without all health and safety considerations such as necessary staff and equipment on the scene.

## **Social and Economic Effects**

Prescribed fires will only be undertaken when prescriptive parameters are met (i.e. wildland urban interface issues, air quality). Part of the pre-planning will be to schedule the fire for a period of maximum smoke dispersal. The primary social and economic effects of smoke will be minimized. The prescribed fire plan will require sufficient signs, notification, and public education to allow the viewing of the burn from a safe distance to be a positive experience for park visitors. Prescribed burn areas will be restricted to staff working on this action. Except for minor temporary effects on visitor use, the use of prescribed fire is expected to have no reasonably discernable negative social or economic impacts. The improved habitat should attract wildlife and improve opportunities for activities such as bird watching.

## **Wetlands and Floodplains**

No actions are proposed that would be located in or have adverse effect on a floodplain or wetland. The EA does not include actions or activities that would require certification and permits pursuant to Sections 401 and 404 of the Clean Water Act. Mechanical removal of vegetation and prescribed burn plans will also follow NPS Directors Order 77-1, Wetland Protection. Directors Order 77-1 covers Executive Order 11990 (i.e. groundwater withdrawals, water diversions, nutrient enrichment of wetlands using the Cowardin *et al.* 1979 definition of NPS wetlands) and Executive Order 11988 (i.e. minimizing impacts of flooding on human safety, and restore/preserve the beneficial values of floodplains). Prescribed fire has the advantage of allowing buffer strips to protect streams and wetlands from adverse impacts, which would result primarily from erosion. If during the organization

and pre-planning for mechanical removal of vegetation or a controlled burn if it is discovered the action is in or would have an adverse effect on a floodplain or wetland the fire management coordinator would write a wetland/floodplain statement of findings.

### **Impairment**

The impacts resulting from the proposal are not significant and will not impair any park resources and values within the Outer Banks Group as defined in the NPS Organic Act of 1916 (16 USC 1); the NPS General Authorities Act of 1970, including amendments in 1978 (16 USC 1a-1); and the NPS Management Policies 2001 (Section 1.4).

### **PUBLIC INVOLVEMENT**

A 30-day public comment period was provided for public review of both the EA and the FMP (the public review period ended Monday, May 7, 2001). Information relating to the documents was available on the NPS Internet site. The public was notified of the availability of the documents by a press release that included the Internet address and procedures for obtaining copies. Public meetings on the documents were held on Roanoke and Hatteras Islands on April 18, 2001. Fifty-five copies of the EA were sent to interested constituents (i.e. local Fire Departments and civic organizations, area conservation and public safety agencies, area libraries)

Comments on the EA were received from the public and are discussed in the Appendix of this document. Comments centered on 5 topics: wildland urban interface, wildfire response times, reduction of fuel load, accessibility, and the citation of a reference. All comments related to the concern for safety. The topics resulted in no changes to the text of the FMP or EA.

### **CONSULTATION**

The Draft FMPs and associated EA's from Colorado National Monument and Big South Fork National River and Recreation Area were used as references and guidance in the development of this plan. The plan and EA from Colorado National Monument were prepared by a working group to serve as a guide for small to medium sized parks that do not have a heavy wildland fire load.

Under the provisions of the Endangered Species Act of 1973, as amended, NPS must work with other Federal and State agencies to protect, conserve, and enhance the continued existence of any endangered or threatened species. Any actions that may impact these species are subject to review by the FWS. A copy of the EA was sent to the FWS for review. Under the FMP, consultation with the FWS will take place prior to each occurrence of mechanical removal of hazardous fuels or the use of a prescribed burn plan.

The National Historic Preservation Act, as amended in 1992 (16 USC 470 *et seq.*); the National Environmental Policy Act; the NPS Cultural Resource Management Guideline (1994), and NPS Management Policies (2001) require the consideration of impacts on cultural resources listed, or eligible for listing, on the National Register of Historic Places. The actions described in the FMP and EA are subject to Section 106 of the National Historic Preservation Act, under the terms of the

1995 Programmatic Agreement among the NPS, the Advisory Council on Historic Preservation, and the National Conference of State Historic Preservation Officers. Impacts to cultural resources have been considered and areas to be altered will be reviewed prior to each occurrence of mechanical removal of hazardous fuels or the use of prescribed burn plans in accordance with applicable laws, policies and agreements.

## **CONCLUSION**

The preferred alternative does not constitute an action that normally requires preparation of an environmental impact statement. Negative environmental impacts that could occur are minor and temporary in effect. There are no unmitigated adverse impacts on public health, public safety, threatened or endangered species, sites or districts listed in or eligible for listing in the National Register of Historic Places, or other unique characteristics of the region. No highly uncertain or controversial impacts, unique or unknown risks, cumulative effects, or elements of precedence were identified. Implementation of the action will not violate any federal, state, or local environmental protection law, and will not impair park resources and values.

I find that the proposal does not constitute a major federal action that would significantly affect the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 (Public Law 91-190, 83 Stat. 953) and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement will not be prepared for this project.

Recommended:

MLR Hudson

Date: 4-8-02

for

Lawrence A. Belli  
Superintendent  
Outer Banks Group

Approved:

W. Thomas Brown

Date: 4/11/02

for

Jerry Belson  
Regional Director  
Southeast Region

## APPENDIX

### Review Comments Environmental Assessment for Fire Management Plan Outer Banks Group

Comments on the Fire Management Plan (FMP) and Environmental Assessment (EA) centered on 5 topics: wildland urban interface, wildfire response times, reduction of fuel load, accessibility, and the citation of a reference. All comments related to the concern for safety. The topics, which are addressed below, resulted in no changes to the text of the FMP or EA.

#### **Wildland Urban Interface**

*Comment: Park neighbors and wildfire fighting partners while commending the park on the value of the FMP noted the extra focus is always needed in the area near private and other public lands that border the park.*

*Response: The need to address the issue of wildland urban interface was one of the primary goals of this Plan and the preferred alternative of the EA. The focus of mechanical hazard fuel removal and the use of prescribed burn plans are prevention of wildfires advancing through park boundaries with private and public lands. Creation of fuel breaks along our more susceptible borders is one of the first actions to be taken under the FMP.*

#### **Wildfire Response Times**

*Comment: Sufficient numbers of fire fighters and equipment are needed for the best response to a wildfire.*

*Response: This aspect of safety is found throughout the FMP. Much of the action in the Plan is planning and organization. To have sufficient numbers of firefighters and equipment is a park and USNPS goal. The planning calls for routine reviews of partnerships with neighboring fire fighting groups (i.e. Local Fire Departments, Non-Federal Conservation Organizations, US Fish & Wildlife Service). These have been the primary organizations involved in the preparation of the FMP. Consultation in the past for this FMP and improvements in our future fire fighting ability is a National Park Service constant. The many pre-suppression actions in the FMP greatly assist directly, or indirectly, in improving response times (i.e. training, fuel load reduction along the wildland urban interface).*

#### **Reduction of Fuel Load**

*Comment: Concern relating to human safety and the reduction of fuel load. This also relates to the issue of the wildland urban interface.*

*Response: A goal of fuel load reduction is to decrease the degree to which the resources will be affected. Throughout the EAs analysis of impacts the degree of wildfire impact on the resources is shown to diminish with the preferred alternative. The high energy level of a wildfire under Alternative A (the No Action Alternative) is the alternative expected to put the maximum impact on resources. The preferred alternative would be the most likely to place the least impact on resources due to fuel load reduction and the ability to control when fire is in an area. Once the actions to reduce fuel load have been put into effect the risk of fire and the degree of energy from wildfires in the park would be reduced. There are a number of sections in both the FMP and the EA for the Plan where it is stated " All aspects of the fire management program will provide for public safety, and the incident will be managed so that the safety of firefighters and visiting public are protected."*

### **Accessibility**

*Comment: Fire roads, fuel breaks, and similar avenues through the vegetation must be maintained to allow access for needed fire fighting equipment but not for other motorized vehicles.*

*Response: This has been a complex on-going issue on the Outer Banks and elsewhere. Many trails enter the park from non-federal properties. With the increase in park use over the past several decades illegal or unmanaged access has increased. To answer the need for improved management of this issue new gates have been tested and road widths have been examined to allow for fire engine access. The park will continue to make use of fire road gates, limited access turnstiles, education, signage, and ranger patrols to protect visitors and property from overuse and misuse. Without these access routes wildfire has a much greater potential to threaten human life and destroy property.*

### **Reference Citation**

*Comment: The citation of "(Frost 1999, in prep)" in relation to the discussion of longleaf pine on Roanoke Island has been updated as of the writing of the FMP and EA.*

*Response: Future copies of the FMP and EA will use "Frost 2000" as the citation.*