

FINDING OF NO SIGNIFICANT IMPACT

Programmatic Fire Hazardous Fuels Management Plan National Park Service, Alaska Region October 2013

The National Park Service (NPS) is approving a programmatic fire hazardous fuels management plan for several National Park System areas in the Alaska Region (see attached map). An environmental assessment (EA) was prepared to evaluate potential impacts to cultural and natural resources in the affected NPS areas associated with three alternatives to address management of hazardous fire fuels potentially threatening structures and human lives. The NPS selected Alternative C (*Mechanical Fuels Reduction and Prescribed Fire*), which was the NPS Preferred Alternative in the EA.

This plan/EA addresses nine NPS areas in Alaska that have an approved wildland fire management plan (FMP) and no specific fire hazardous fuels management plan. The plan excludes all units in Southeast Alaska, Kenai Fjords National Park, and Aniakchak National Park and Preserve because these areas do not have an approved wildland fire management plan. Neither does it cover Denali National Park and Preserve because this area has approved wildland fire management and hazardous fuels management plans.

The completed wildland fire management plans for the affected park areas include consideration and measures to protect the built environment (including historic structures) and the lives of visitors, employees, and firefighters, but they did not address the scope of proposed mitigating measures for proactive vegetative fire fuels reduction presented in this plan. The original FMPs, written 9-13 years ago, emphasized responses to wildfires during a time when the vegetative fuels management program was not fully developed because of incomplete asset inventories and community protection plans. Though the original FMPs included fuel reduction techniques (mechanical and prescribed fire), they did not address the potential environmental impacts of specific fuel reduction prescriptions because that level of detail was beyond the scope of those plans.

Two parties commented on this EA with letters and posting to the NPS Planning, Environment, and Public Comment (PEPC) web site during a 30-day public comment period from August 21 to September 20, 2013.

ALTERNATIVES

Three alternatives were evaluated in the EA.

Alternative A - No Action

Under the No Action alternative, no coordinated for clearing or thinning flammable vegetation from around structures would occur. NPS wildland fire management personnel would respond to fires in accordance with the Alaska Interagency Wildland Fire Management Plan 2010 and park

specific response plans. Trees and other flammable vegetation that present a hazard to personnel, structures, or equipment would be removed in a case by case basis.

Alternative B – Mechanical Fuels Reduction

Under this alternative the NPS would remove hazardous vegetative fuels surrounding structures in developed areas and at remote backcountry sites using general Alaska Firewise concepts. Fuel reduction techniques would utilize mechanical and manual treatments to reduce vegetation and maintain defensible spaces around NPS and private structures on NPS lands. Mechanical fuels reduction is defined as the use of power saws, cross-cut saws, mowers, hand tools, or similar devices to mitigate hazard fuels buildup or to reestablish historical landscape conditions in areas where fire would pose an unreasonable threat to property or resources.

Three basic Firewise treatment zones around structures and sites are shown schematically in figure 1. Zone 1 has a radius of 15 feet around structures and all conifers and dead or dry vegetation would be removed. This zone could contain mowed grass, small native plants, flowers, or gravel. Zone 2 would extend an additional 15 feet to a 30-foot radius around a structure. This zone would include removal of all dry or dead vegetation, removal of shrubs beneath trees, pruning of limbs on mature conifers to 6-8 feet above the ground surface, and thinning of conifers or clumps of small conifers up to about 15 feet between extending branches. Zone 3 would extend an additional 70 feet from zone 2 for a total minimum distance of 100 feet from each structure. On downslope areas this distance would be increased, according to the slope angle over 30% incline. In zone 3 the thinning of trees would be to a spacing of 10-15 feet, depending on the location and flammability of the trees.

Various criteria would be used to determine treatment priority around structures. These include critical areas (residences, daily used administrative sites or lodges, National Historic Landmarks) and full management areas (sites eligible for the National Register of Historic Places [NRHP], patrol cabins, public use cabins, subsistence or guide cabins, mining sites). Non-sensitive structures (trespass cabins, sites not eligible for the NRHP) and sites to avoid (archeological sites or burial sites) would not be treated. Each treatment site would receive an evaluation with fire management and cultural resources personnel. Measures would be specified to protect historic resources pursuant to a National Historic Preservation Act (NHPA) Section 106 reviews. Vegetation removal techniques would be accomplished pursuant to aboriginal standards and in a manner that minimizes disturbance of administrative and public activities. Debris would be disposed of by use as firewood, pile construction and burning, lop and scatter, or chipping. Operations in wilderness would consider the minimum tool and minimum requirements analysis and the use of motorized equipment and vehicles would be tempered accordingly, including access methods and means. Maintenance work in wilderness will be accomplished with non-motorized tools. The programmatic MRA, Appendix B to the EA, further describes appropriate sites for mechanical fuels reduction activities in wilderness.

Alternative C –Mechanical Fuels Reduction and Prescribed Fire (*NPS Preferred Alternative*)

This alternative would use all aspects of alternative 2 and the use of broadcast burning as an additional clearing tool to create a buffer around a given structure or asset. Prescribed fire would be used for reducing hazard vegetative fuel loads near resources requiring protection and for restoring historical conditions at selected sites. Within designated or eligible wilderness areas, broadcast burning may be considered on a case by case basis, subject to a minimum requirements analysis. Prescribed fire operations would occur at locations and times when favorable conditions generate low intensity burns that could be safely controlled and would produce minimal smoke effects to surrounding inhabited areas. Prescribed burns would use strategic weather, vegetative, and topographic conditions identified in a specific burn plan. Treatment would be located to capitalize on natural features and fuel breaks such as rock outcroppings, rivers, and lakes. Each prescribed burn plan would be written and approved prior to implementation in accordance with NPS policy.

PUBLIC INVOLVEMENT

The EA was issued for public review and comment from August 21 to September 20, 2013. The EA was mailed to about 50 parties, including state and federal agencies, federally recognized tribes, Native corporations, communities, organizations, and individuals, and it was posted on the NPS PEPC website. A press release announced the availability of the EA for public review and comment with a link to the PEPC site.

Comments on the EA were received from the State of Alaska and National Parks Conservation Association (NPCA). The NPS identified a few substantive comments that either raised an issue not fully addressed in the EA, suggested additional mitigation measures, or provided new information or facts that have bearing on the decision. Responses to these comments are attached to this FONSI in Appendix A. Changes to the EA are indicated in the attached Errata in Appendix B.

DECISION

The NPS decision is to select Alternative 3 (*Mechanical Fuels Reduction and Prescribed Fire*).

RATIONALE for the DECISION

Alternative 3 (*Mechanical Fuels Reduction and Prescribed Fire*) satisfies the purpose and need for the project better than the no-action alternative or alternative 2 because it provides greater flexibility in managing vegetative hazardous fire fuel loads around structures and communities. It achieves management objectives to reduce hazardous vegetative fuels accumulations around sites important to public safety and park administration through use of Firewise mechanical fuel treatments and prescribed fire. It provides for protection of park visitors, employees, fire management personnel, developed facilities, and structures on private inholdings located very close to NPS lands. This proactive fire management plan would result in fewer heavy-handed and fire emergency response activities than is now the case. Furthermore, this alternative was

found to be the environmentally preferable alternative because it provides the full spectrum of fire fuels management strategies and practices to best protect, preserve, and enhance cultural sites and natural resources.

SIGNIFICANCE CRITERIA

The preferred alternative will not have a significant effect on the human environment. This conclusion is based on the following examination of the significance criteria defined in 40 CFR Section 1508.27.

(1) Impacts that may be both beneficial and adverse. A significant effect may exist even if the Federal agency believes that on balance the effect will be beneficial.

The EA evaluated the effects of Alternatives 1 through 3 on air quality, water quality, vegetation (including wetlands), fish and aquatic habitat, wildlife and habitat, visual quality, visitor experience, cultural resources, wilderness, local economy, subsistence, and private inholdings. As documented in the EA the effects of the selected alternative will be mostly short-term (some long-term effects) minor and adverse or beneficial, depending on the impact topic. There will be no significant impacts to any of these resources and values and no significant restriction of ANILCA Title VIII subsistence uses.

(2) The degree to which the proposed action affects public health or safety.

Proactive fire fuels management actions (including clearing, thinning, and use of prescribed fire) will not likely result in any observable adverse effects to public health and safety in the subject National Park System areas. The use of Firewise treatments could reduce hazardous vegetative fuel loads over highly flammable areas near structures and important human use areas thereby improving public and employee safety from uncontrollable conflagrations over time. The implementation of prescribed fires with qualified NPS personnel during appropriate conditions would further reduce fuel loads near high-value resources at risk from wild fires. Full suppression techniques would continue to be utilized in critical and full zones to protect human life and occupied structures, but the proposed proactive measures to reduce fuel loads in sensitive sites will increase the likely successful protection of public health and safety.

(3) Unique characteristics of the geographic area such as proximity to historic or cultural resources, park lands, prime farmlands, wetland, wild and scenic rivers, or ecologically critical areas.

The proposed action will improve the NPS capabilities to protect valuable historic and culturally valuable sites from wildfires. The use of prescribed fire by trained personnel during appropriate conditions would further protect high-value resources and sites (such as visitor centers, lodges, National Register sites, and administrative buildings and facilities). These locations would be at greater risk of uncontrollable wildland fires during times and in conditions that are difficult to defend against where proactive protective measures are not implemented.

(4) The degree to which effects on the quality of the human environment are likely to be highly controversial.

None of the proposed fire management strategies in these NPS areas are highly controversial because these practices have been widely accepted elsewhere in Alaska. Concerns were raised about the use of motorized tools and prescribed fire in designated or eligible wilderness areas, but these are addressed through implementation of the minimum requirements and minimum tools analyses.

(5) The degree to which the possible effects on the human environment are highly uncertain or involve unique or unknown risks.

The effects of the selected alternative do not involve unique or unknown risks because these fire hazardous fuels treatment strategies have been successfully used in other locations of Alaska where wildland fires are prevalent. There is always the potential for wildland fires or prescribed fires to abruptly change course with a sudden change in conditions such as in wind directions and speeds, but this is minimized with use of newly available remote automated weather data and fully trained personnel in fire decision-making.

(6) The degree to which the action may establish a precedent of future actions with significant effects or represents a decision in principle about a future consideration.

This action will not set a precedent because uses of these fire fuels treatment actions have been successfully applied elsewhere in Alaska, such as the use of Firewise treatments in Denali National Park and Preserve and the use of prescribed burns on brush piles.

(7) Whether the action is related to other actions with individually insignificant but cumulatively significant impacts. Significance exists if it is reasonable to anticipate a cumulatively significant impact on the environment. Significance cannot be avoided by terming an action temporary or by breaking it down into small component parts.

Neither the adoption of the proposed fire hazardous fuels treatment actions or this action plan added to other past, ongoing, or foreseeable actions would result in any significant cumulative effects on the environment. The periodic use of mechanized equipment and transport vehicles such as helicopters could result in short-term perturbations to the sound environment, but these effects would be short-term and localized and therefore not significant.

(8) The degree to which the action may adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places or may cause loss or destruction of significant scientific, cultural, or historical resources.

The selected alternative would not adversely affect districts, sites, highways, structures, or objects listed in or eligible for listing in the National Register of Historic Places so long as NPS park and regional fire personnel consult with their respective cultural resources specialists and obtain SHPO concurrence per Section 106 of the NHPA before proceeding with a specific treatment plan. The proposed action would provide additional protection from devastating

wildfires for structures, districts, and sites listed or eligible for listing on the National Register of Historic Places.

(9) The degree to which the action may adversely affect an endangered or threatened species or its habitat that has been determined to be critical under the Endangered Species Act of 1973.

The U.S. Fish and Wildlife Service (FWS) Anchorage and Fairbanks Field Offices for Endangered Species Act Section 7 consultation indicated that polar bears, Pacific walrus, sea otters, Kittlitz's murrelets, and yellow-billed loons are threatened or candidate species that could occur near NPS areas with fire treatment sites, particularly in Northwest Alaska and mountainous areas where Kittlitz's murrelets may nest, or coastal areas where the western populations of sea otters occur. Adverse effects on these species would be avoided by consulting with FWS and not flying directly over active walrus haul outs and sea otter use areas, maintaining minimum distances from polar bears and nesting yellow-billed loons, and avoiding nesting periods and locations of Yellow-billed loons and Kittlitz's murrelets.

(10) Whether the action threatens a violation of Federal, State, or local law or requirements imposed for the protection of the environment.

The selected alternative would not violate any Federal, State, or local law.

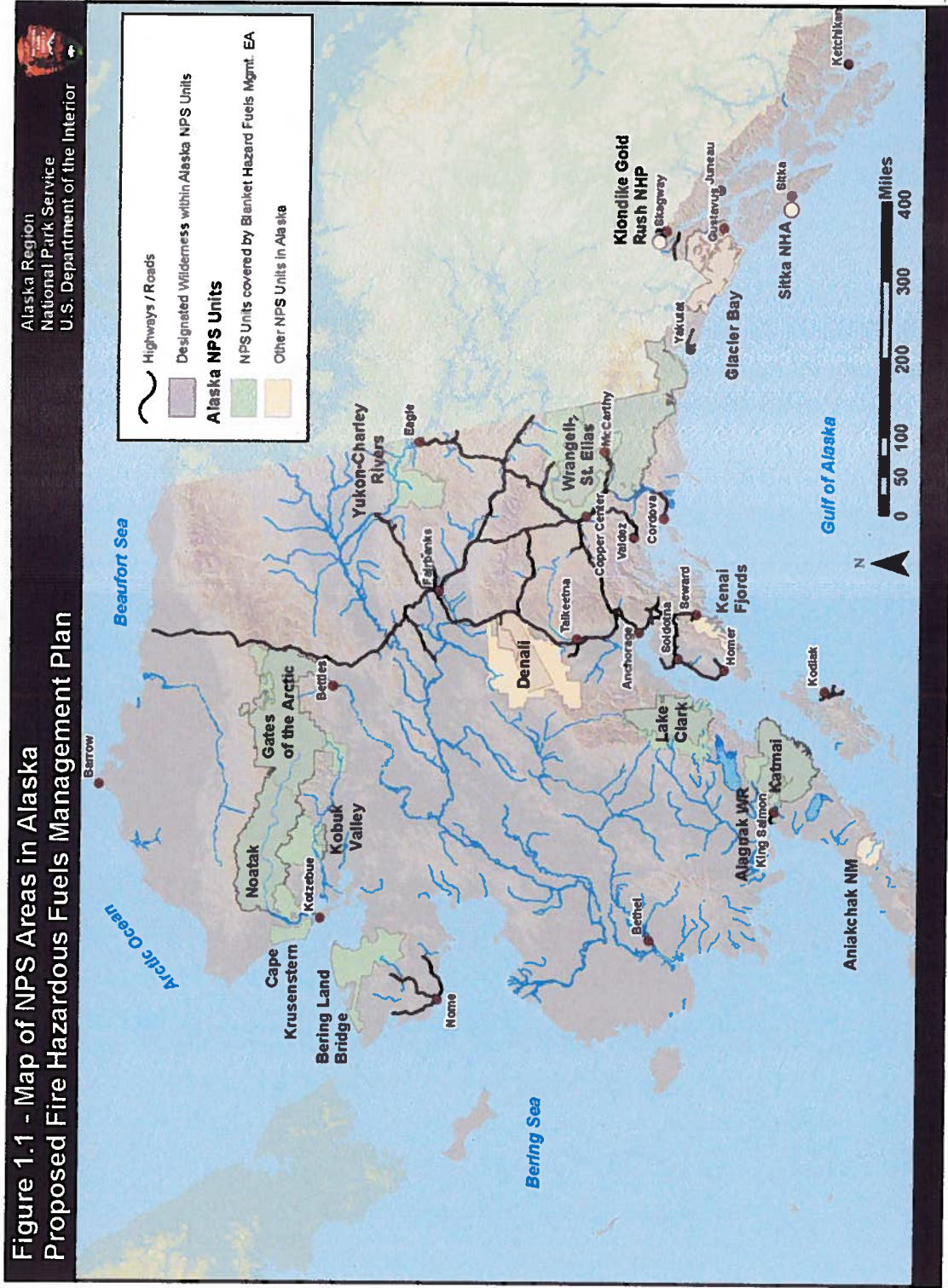
FINDINGS

The levels of adverse impacts to park resources anticipated from the selected alternative will not result in an impairment of Alaska NPS area resources that fulfill specific purposes identified in the establishing legislation or that are essential to the natural or cultural integrity of these areas (Appendix C).

The selected alternative complies with the Endangered Species Act, the National Historic Preservation Act, and Executive Orders 11988 and 11990. There will be no significant restriction of subsistence uses as documented by the Alaska National Interest Lands Conservation Act, Title VIII, Section 810(a) Summary Evaluation and Findings.

The National Park Service has determined that the selected alternative does not constitute a major federal action significantly affecting the quality of the human environment. Therefore, in accordance with the National Environmental Policy Act of 1969 and regulations of the Council on Environmental Quality (40 CFR 1508.9), an environmental impact statement is not needed and will not be prepared for this project.

NPS Areas Included in the Programmatic Fire Hazardous Fuels Management Plan



APPENDIX A

NPS RESPONSE TO PUBLIC COMMENTS for Programmatic Fire Hazardous Fuels Management Plan National Park Service Alaska Region Environmental Assessment

In response to the environmental assessment, the NPS received 2 comment letters during the public comment period. Described below are the substantive comments and the NPS responses. Substantive comments are those which raise important new issues, suggest new viable alternatives, suggest mitigation measures, or correct or add factual information that may have bearing on the impacts or decision at hand. The following parties submitted substantive comments. Their comments are organized and numbered with the NPS responses following immediately after:

Government to Government:
SOA - State of Alaska

Non-governmental Organization (NGOs):
NPCA - National Parks and Conservation Association

SOA1: The plan, however, may be overly restrictive in areas classified as having an “eligible” wilderness land status as defined by the Director’s Order 41 Reference Manual. While the plan recognizes and provides direction for “eligible” lands, there is no recognition of the subcategory “eligible – not proposed” (page 1-11, Section 1.2.4) even though there are lands within Alaska park units that were identified as “eligible” but not proposed for wilderness designation in the wilderness reviews conducted in accordance with Section 1317 of ANILCA. According to Service policy, these lands are not subject to a minimum requirements analysis.

NPS Response: NPS Management Policies in Section 6.3.1 and DO-41 indicate all NPS management decisions affecting any category of wilderness will apply the concept of “minimum requirement” for the administration of the area. “The only exception is for areas that were found eligible, but for which, after completion of a wilderness study, the Service has not proposed wilderness designation. However, those lands will still be managed to preserve their eligibility for designation.” Though the NPS completed wilderness recommendation EISs for the subject units and signed Records of Decisions (RODs) at the Regional Director and NPS Director levels in 1988, no final action was taken in the Office of the Secretary and no wilderness recommendation was conveyed to Congress. Therefore NPS General Management Plans for the Alaska units remain the authority for eligible wilderness until a new wilderness study or eligibility assessment is completed. Because the category “eligible – not proposed” and the current NPS policy did not exist at the time the GMPs and 1988 EISs and RODs were completed,

the Service chooses to use the minimum requirements analysis (MRA) to help managers make informed decisions about proposed Service activities to preserve wilderness character.

SOA2: *Page 1-15, second paragraph. This paragraph states, "Where private inholders may need to perform minimal Firewise maintenance on NPS lands near their buildings, a special use permit issued from the appropriate superintendent would be required pursuant to 36 CFR Part 1.6. See Appendix D for an example." We request the Service identify whether there are provisions that waive the permit requirement in emergency situation where there is an immediate risk to life or property.*

NPS Response: There may be emergency circumstances when obtaining a special use permit would not be possible. If the NPS is not be able to execute FIREWISE service measures in a timely manner, then NPS may authorize an individual landowner to remove vegetation on adjacent NPS land on behalf of the Service on a case-by-case basis without a special use permit. This change is reflected in the errata.

SOA3: *Page 2-7, 2.4.8 Operations in Wilderness, Use of Tools, second paragraph: Motorized tools can be authorized within designated wilderness when determined to be the minimum tool through a minimum requirements analysis. Subsequent use of motorized hand tools may be necessary at some sites where alder and willow are present since both can sprout from the root crown and/or roots after top-kill. We request the following edit: Subsequent maintenance work would be accomplished only with non-motorized hand tools at all sites within a designated wilderness unless a minimum requirement analysis is completed and motorized equipment is determined to be the minimum tool.*

NPS Response: The Minimum Requirements Analysis has been completed for this project. The MRA determined that use of motorized tools for initial work may be authorized because using motorized tools will have less of an adverse impact to wilderness character given the considerable vegetative fuel load that initially needs to be removed. Though the selected action creates a greater impact to the undeveloped quality of wilderness character by introducing motorized equipment into the wilderness, it creates less of an impact to opportunities for solitude than using nonmotorized tools because there would be a smaller crew on site for a shorter period of time. The MRA also found that using nonmotorized tools for subsequent work will have the least impact to wilderness character because the work can be accomplished with nonmotorized tools in a timely manner with small crews. Therefore, we are not changing the document as requested.

SOA4: *Page 3-79, third paragraph: For clarity, we request the following edit in the final plan: ANILCA provides a number of special provisions that modify the Wilderness Act. These special provisions include, but are not limited to.*

NPS Response: NPS has made the suggested edit as also noted in the errata.

SOA5: *Page 3-79, fourth paragraph: This section states "There are no special provisions for motorized access for administrative activities; administrative activities that propose a Wilderness Act 4(c) prohibition are subject to a minimum requirements analysis." ANILCA*

amends the Wilderness Act in Alaska and motorized methods of access (e.g. snowmachines, motorboats and airplanes) are allowed in designated wilderness. To remove the implication that motorized methods of access allowed for public use are prohibited in designated wilderness for administrative activities, we request the sentence be revised as follows: There are no special provisions for motorized access for administrative activities; administrative activities that propose a Wilderness Act 4(c) prohibition ~~are~~ may be subject to a minimum requirements analysis.

NPS Response: NPS has edited this section as noted in the errata. NPS will continue to minimize adverse impacts to wilderness character from use of motorized access where it makes sense to do so.

SOA6: Page 4-3, third paragraph: *The EA does not indicate the methodology used to determine the total number of miles of roads and trails that traverse the park units covered by this EA, nor is it clear how the number of airstrips in the planning area were determined. The State has identified numerous RS 2477 rights-of-ways, 17(b) easements, roads, trails, airstrips, etc. in the planning area. If the Service is going to definitely cite the total number of miles of roads, trails, airstrips, etc. within this and other planning documents, we request that the data be supported by the methodology and/or a source citation, and that the State be given the opportunity to contribute to this data before the EA is finalized.*

NPS Response: The final public review EA has been issued; however, the NPS can make corrections in the errata as needed for important clarifications or corrections. The errata document the methods NPS used to estimate cumulative effects from other past, ongoing, and foreseeable future activities in NPS areas. ANCSA 17(b) easements are for access across Native corporation lands to public lands; they are not on NPS publicly owned lands and have little to no bearing on the cumulative effects analysis on NPS lands.

SOA7: Page 4-25, 4.8.1.2 Cumulative Effects, sixth paragraph, second sentence:

The Plan asserts: "The impacts to subsistence resources from various past and ongoing uses and developments has been widespread, extensive, displaces vegetation and wildlife habitat and fractures wildlife distributions, and may result in reduction of and competition for resources with subsistence users. Because ANILCA Title VIII recognizes a preference for subsistence uses of these resources, the larger impacts should be reduced by closures to general uses."

The description of cumulative impacts to subsistence resources and uses attempts to generalize all past impacts on all park lands. This statement grossly misrepresents the overall health of subsistence resources within the park Units and provides no scientific evidence to document negative impacts. The statement also inaccurately interprets Title VIII of ANILCA, Title VIII establishes a subsistence priority opportunity, but it makes it clear the priority has sideboards.

ANILCA requires subsistence uses to be "the priority consumptive uses ... when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population" (Section 802(2)). Additionally, Section 804 of ANILCA further describes the criteria to implement appropriate limitations to restrict the taking of fish and wildlife in order to protect the continued viability of populations or continue

such uses. ... We request this entire paragraph be re-evaluated and any related conclusions be revised, as needed.

NPS Response: The subject two sentences in the EA are modified in the errata to more closely follow the language in ANILCA Title VIII.

NPCA1: *While initially the EA refers to “the built environment” and “structures”, later it discusses the need to protect communication sites such as repeaters and weather stations, and cultural sites that aren’t necessarily buildings such as trails, trap sites, and Pleistocene hunting camps. Perhaps that explains the large number of remote locations on the maps. More details on what those 321 sites are would help us better understand and evaluate this proposal.*

NPS Response: Communications sites, weather stations, and various cultural resources sites in addition to buildings, are often built by humans and qualify as part of the “built environment and structures.” The errata include a table (Table 3.0 to be inserted in Section 3.1 of the EA) with summary statistics for NPS-owned Full and Critical sites with respect to site type and wilderness designation. Table 3.0 uses updated data from spring of 2013 in preparation for the 2013 fire season. There are minor differences between the numbers of sites per park in these tables versus the numbers of sites per park that were identified within the Programmatic Fire Hazardous Fuels Management Plan Environmental Assessment that used data from 2012. The net change for all nine parks resulted in four more sites to be protected. Updates to fire protection sites occur each year; however, these minor adjustments do not change the overall effects to the parks.

NPCA2: *While losing structures to wildfires is always difficult, we feel a more balanced and cost effective approach may be to simply replace the occasional remote structure lost to fire rather than use helicopters and equipment to maintain fire perimeters at over 300 sites for years and years to come. Repeaters, weather stations, and cultural sites without buildings may not be worth the effort to protect. If there are remote sites such as ranger patrol cabins that need some trees removed, perhaps that is better served with hand tools and without the need of an EA.*

NPS Response: Some of the historical sites are irreplaceable if they are burned. Administrative sites are difficult to readily replace, especially given the recent federal financial environment. Using hand tools instead of power tools to clear and thin flammable vegetation around remote patrol cabins will be assessed with an MRA when in eligible or designated wilderness. The NPS will prioritize sites to be treated based on fire risk and public value of the structures. In general NPS finds it less expensive to proactively protect valued sites than to try to save them in face of a fire disaster and risking human life and equipment in the process.

NPCA3: *It is unclear to us whether the EA is also including fire treatments on or around private property. While generally the EA refers to NPS structures, the number and placement of dots on the maps looks to us like it might include private inholdings. For example the numerous locations along the lakeshore of Lake Clark (p. 3-11) and in the vicinity of native corporation land in Wrangell-St. Elias (p 3-12) appear to include private property. Additionally, text on page A-6 describes the general concept of Alternative B as “to create and maintain a defensible space around park structures or private inholdings.”*

NPCA is also mixed on what the role of NPS is and should be in protecting private structures. Generally, we feel it is the responsibility of the landowner to determine and implement preventative measures on their own land. However we appreciate that cooperation among landowners is important especially regarding safety issues in remote areas, especially when NPS land may be needed to provide an adequate buffer around a structure found on private property. We would appreciate gaining more clarity on what NPS plans are regarding clearing on and around private property.

NPS Response: The NPS is not proposing to conduct Firewise activities or prescribed burns on private property; however, the agency may perform these activities on NPS-managed lands to protect neighboring property and structures, or the agency may issue permits to private property owners to clear NPS lands of hazardous fire fuels immediately adjacent to their structures. An example situation is the multitude of private structures in the Kennecott Mine area of WRST. The NPS will prioritize its proactive fire treatment activities based on most-at-risk areas and available funds. The dots on the subject maps cover large areas and private property owners are responsible for proactive fire treatment activities on their lands.

***NPCA4:** We recommend that treating additional acreage to fire breaks, prescribed burns, and broadcast burning as outlined in Alternative C should be extremely limited. This treatment tool may be appropriate for populated areas such as the towns of McCarthy or Port Alsworth, but we don't see the wisdom of applying this technique to many areas, especially in designated Wilderness or remote locations. Most Alaska parks have not been subject to fire suppression and don't have the problem with fuels build up like lower 48 parks.*

NPS Response: The proposed action in the EA limits the maximum estimated area for broadcast (prescribed) burns to 25,500 acres in 4-5 NPS areas, which does not include all areas addressed in the EA. The two areas in WEAR parks where broadcast (prescribed) burns would most likely occur would be KOVA and NOAT. Prescribed burns are not proposed in GAAR or KATM and presumably would not be needed in BELA or CAKR. Furthermore, these prescribed burn acreages are minimal when compared to the tens of thousands of acres that burn in wildfires in these large NPS areas each fire season. The 25,500 acres of broadcast (prescribed) burns would be spread over 10-15 years of treatment and averaging no more than about 2,500 acres per year. Though wildfires burn freely in vast areas of Alaska, fuels have built up near developed areas and structures because fires have been actively fought back in these areas. These are the areas where Firewise treatments and proactive prescribed burns are most needed.

APPENDIX B

ERRATA FOR THE PROGRAMMATIC FIRE HAZARDOUS FUELS MANAGEMENT PLAN EA

NPS Alaska Region

The following are corrections to information presented in the EA.

1. Page 1-15, Section 1.4, Paragraph 2: The following sentence is appended to this section:
“There may be emergency circumstances when obtaining a special use permit would not be possible. If the NPS is not able to execute Firerwise service measures in a timely manner, then NPS may authorize an individual landowner to remove vegetation on adjacent NPS land on behalf of the Service on a case-by-case basis without a special use permit.”
2. Section 3.1, Page 3.2, Insert the general descriptions of types of fire protection points and Table 3.0, which summarizes the numbers and types of protection points for each affected NPS unit.

Cabin/Structure sites are generally backcountry cabins or other built structures (camp, cache, dredge, trestle, etc.). RAWS/Repeater sites are either Remote Automated Weather Stations or radio repeaters. In most cases, the “Other” category denotes sensitive cultural resources. Table 3.0 uses updated data from spring of 2013 in preparation for the 2013 fire season, which increased the total number of fire protection points across all nine parks by a net 4 sites to 324 sites as compared to the summary of 321 sites used in public review the EA.

Table 3.0 - Summary Estimates of Fire Protection Points by NPS area and site type.

Gates of the Arctic National Park and Preserve				
Summary of Characteristics for NPS owned Critical and Full sites				
	Cabin/Structure	RAWS/Repeater	Other	Sum

Designated Wilderness	11	4	0	15
Eligible Wilderness	1	0	0	1
Outside of Park	1	1	0	2
<i>Sum</i>	<i>13</i>	<i>5</i>	<i>0</i>	<i>18</i>
Yukon-Charley Rivers National Preserve				
Summary of Characteristics for NPS owned Critical and Full sites				
	Cabin/Structure	RAWS/Repeater	Other	<i>Sum</i>
Designated Wilderness	0	0	0	0
Eligible Wilderness	17	5	0	22
Not Eligible Wilderness	3	2	0	5
Outside of Park	0	1	0	1
<i>Sum</i>	<i>20</i>	<i>8</i>	<i>0</i>	<i>28</i>
Wrangell-St. Elias National Park and Preserve				
Summary of Characteristics for NPS owned Critical and Full sites				
	Cabin/Structure	RAWS/Repeater	Other	<i>Sum</i>
Designated Wilderness	18	5	1	24
Eligible Wilderness	52	10	5	67
Not Eligible Wilderness	24	1	1	26
Outside of Park	2	0		2
<i>Sum</i>	<i>96</i>	<i>16</i>	<i>7</i>	<i>119</i>
Western Arctic National Parklands				
Summary of Characteristics for NPS owned Critical and Full sites				

	Cabin/Structure	RAWS/Repeater	Other	Sum
Designated Wilderness	4	6	1	11
Eligible Wilderness	27	13	20	60
Not Eligible Wilderness	1	0	0	1
Outside of Park	0	3		3
Sum	32	22	21	75
Lake Clark National Park and Preserve				
Summary of Characteristics for NPS owned Critical and Full sites				
	Cabin/Structure	RAWS/Repeater	Other	Sum
Designated Wilderness	6	3	1	10
Eligible Wilderness	9	2	1	12
Not Eligible Wilderness	9	2		11
Outside of Park		1		1
Sum	24	8	2	34
Katmai National Park and Preserve*				50 est.
* Specific Data not available				
TOTAL				324

3. Page 3-79, third paragraph: For clarity, we include the underlined text edit in the final plan/EA: ANILCA provides a number of special provisions that modify the Wilderness Act. These special provisions include, but are not limited to
4. Page 3-79, fourth paragraph: This paragraph is changed to state: "There are no special provisions for motorized access for administrative activities in wilderness. Pursuant to NPS Management Policies Section 6.3.5 and Director's Order #41, a MRA must be

applied to proposed administrative actions involving a use prohibited by 4(c) of the Wilderness Act and all other administrative actions within wilderness that could potentially affect wilderness character.”

5. Page 4-3, third paragraph, methods for estimating cumulative effects: “The data for the NPS region-wide summary of miles of roads, OHV trails, and FAA documented landing strips used in the cumulative effects section were borrowed from recent published NPS region-wide EAs such as the Invasive Plant Management Plan EA (NPS 2009) and Subsistence Collections EA (NPS 2012). These numbers were then adjusted according to which areas are being considered in the fire hazardous fuels management plan. For these plans/EAs the data were estimated from NPS GMPs, EISs, and most recent NPS OHV field surveys.
6. Page 4-25, 4.8.1.2 Cumulative Effects, sixth paragraph, first two sentences: These two sentences in the EA are modified as follows: “Impacts to subsistence resources and uses from various past and ongoing developments and uses have been widespread, displaced areas of vegetation and wildlife habitat, and fractured some areas of wildlife distributions, which may have resulted in reductions of and competition for resources with subsistence users in a few NPS-managed areas. ANILCA Sections 802 recognizes a preference for subsistence consumptive uses “... *when it is necessary to restrict taking in order to assure the continued viability of a fish or wildlife population or the continuation of subsistence uses of such population*”. Additionally, ANILCA Section 804 further describes the criteria to implement appropriate limitations to restrict the taking of fish and wildlife in order to protect the continued viability of such populations or to continue such uses.”