
U.S. Department of the Interior

National Park Service



Black Canyon of the Gunnison National Park

Curecanti National Recreation Area

Colorado

Finding of No Significant Impact

Fire Management Plan

NPS-124131

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Recommended:

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Introduction

In compliance with the National Environmental Policy Act (NEPA) of 1969, as amended (42 United States Code [USC] 4321 et seq)¹; the Department of the Interior NEPA regulations (43 CFR Part 46); and NPS Director's Order 12: Conservation Planning, Environmental Impact Analysis and Decision-Making and its accompanying NPS NEPA Handbook, the National Park Service (NPS) prepared a Fire Management Plan (FMP) and associated Environmental Assessment (EA). The FMP's purpose is to incorporate federal wildfire policy and guidance grounded in the evolving science of fire management into an updated plan for Black Canyon of the Gunnison National Park (Black Canyon, park unit) and Curecanti National Recreation Area (Curecanti, park unit) that meets NPS policies and requirements. The need for the FMP is to provide a flexible range of options and activities the NPS can use to respond to changes in environmental conditions and the specific needs of fire management within the park units, and each park unit with burnable vegetation is required to have an approved FMP, in accordance with Directors Orders #18, Wildland Fire Management.

The statements and conclusions reached in this finding of no significant impact (FONSI) are based on documentation and analysis provided in the EA and associated decision file. The EA is incorporated by reference in this FONSI and is available at <https://parkplanning.nps.gov/BLCACUREFMP2024>.

Background

Black Canyon is located in southwestern Colorado, approximately 15 miles east of Montrose, Colorado and was established as a National Monument in 1933 and designated as a National Park in 1999.

Approximately 15,600 acres, or 51% of the park is designated as wilderness and managed as part of the National Wilderness Preservation System. Curecanti is located approximately five miles west of Gunnison, Colorado, and was established in 1965 to provide a variety of recreational opportunities to visitors. It is approximately 41,673 acres, of which 9,865 (24% of the total) acres are water. Both park units are managed by a single, combined staff.

¹ *Executive Order 14154, Unleashing American Energy (Jan. 20, 2025), and a Presidential Memorandum, Ending Illegal Discrimination and Restoring Merit-Based Opportunity (Jan. 21, 2025), require the Department to strictly adhere to the National Environmental Policy Act (NEPA), 42 U.S.C. §§ 4321 et seq. Further, such Order and Memorandum repeal Executive Orders 12898 (Feb. 11, 1994) and 14096 (Apr. 21, 2023). Because Executive Orders 12898 and 14096 have been repealed, complying with such Orders is a legal impossibility. The National Park Service verifies that it has complied with the requirements of NEPA, including the Department's regulations and procedures implementing NEPA at 43 C.F.R. Part 46 and Part 516 of the Departmental Manual, consistent with the President's January 2025 Order and Memorandum. The NPS has also voluntarily considered the Council on Environmental Quality's rescinded regulations implementing NEPA, previously found at 40 C.F.R. Parts 1500–1508, as guidance to the extent appropriate and consistent with the requirements of NEPA and Executive Order 14154.*

The park units' FMP expired on October 1, 2024, and is no longer valid. Current policy dictates NPS units without valid FMPs must take a suppression action on all wildfires, and no prescribed fire, manual, or mechanical fuels treatments will be approved.

Selected Action

Based on the analysis presented in the EA, the NPS selected Alternative B, which will implement a new FMP for the park units. The selected alternative best meets the purpose and need for action without causing significant impacts to the park units' resources.

Under the selected action, the park units will be divided into three fire management units (FMUs). Fire management activities will manage wildfires for risk, protection, and resource management objectives using all available strategies and tactics. The full spectrum of wildfire response strategies will be employed, dependent on which FMU the fire is burning in. Examples include but are not limited to initial attack for full perimeter control to monitoring a portion of a wildfire burning over time and space, or a combination of strategies. Planned fuels treatments will include prescribed fire, manual treatments, mechanical treatments, and herbicide treatments. These fuels treatments are aimed at achieving fuels reduction, creating and maintaining desired landscapes, resource objectives, or other site-specific objectives. This alternative will also enhance relationships and collaboration, prioritize ecosystem stewardship, allow naturally ignited wildfires to function as part of the ecosystem, and employ science-based decisions. The only other alternative analyzed was to not implement a new FMP (Alternative A, No Action).

The three FMUs are:

- The Wilderness FMU is composed of all designated wilderness within Black Canyon, except for areas above the canyon rim which are also designated as Gunnison sage-grouse critical habitat (note – there is no wilderness in Curecanti). Wilderness areas that are critical sage-grouse habitat above the canyon rim are included in the Habitat FMU. Strategic objectives in the Wilderness FMU will focus on allowing wildfire to continue its ecological role, preserve natural and cultural resources, reduce negative human impacts, and to reduce negative impacts to wilderness character qualities.
- The Habitat FMU is composed of all occupied and unoccupied critical Gunnison sage-grouse habitat within Black Canyon and Curecanti above the canyon rim. Strategic objectives in this FMU will focus on the health and perpetuation of Gunnison sage-grouse habitat. Most often, wildfires in this FMU will be suppressed to the smallest size possible, however low severity fire may be allowed to provide ecosystem benefits.
- The Conditional FMU includes all areas not designated as wilderness or sage-grouse critical habitat. Strategic objectives of this FMU will emphasize the protection of high value resources and assets (e.g., structures, cultural resources, threatened and endangered species, etc.) and then ecological benefits.

Maps of each park unit with the proposed FMUs are included below (Figures 1 and 2), along with a table (Table 1) comparing the three FMUs.

Table 1. Objectives and tools by FMU.

FMU	FMU Wildfire Objectives	Fire Management Tools
Wilderness	<ul style="list-style-type: none"> • Manage wildfires in designated wilderness to preserve wilderness character and reduce negative human impacts within wilderness. • Minimize use of helicopters over designated wilderness. • Allow wildfire to continue its ecological role whenever the potential for resource benefits exists and risk management allows. 	<p>All tools will be allowed:</p> <ul style="list-style-type: none"> • All wildfire strategies will be considered. • Prescribed fire, manual, and mechanical treatments will be considered, following direction provided in the accompanying programmatic Minimum Requirement Analysis (MRA).
Habitat	<ul style="list-style-type: none"> • Manage wildfires for the health and perpetuation of sage-grouse habitat. 	<p>All tools will be allowed:</p> <ul style="list-style-type: none"> • All wildfire strategies will be considered; however, suppression will most often be used to protect important habitat. • Prescribed fire, manual, and mechanical treatments will be considered, following direction provided in the programmatic MRA.
Conditional	<ul style="list-style-type: none"> • Manage fire primarily for the protection of high value resources and assets, and second, for ecological benefits. 	<p>All tools will be allowed:</p> <ul style="list-style-type: none"> • All wildfire strategies will be considered; however, suppression will most often be used to protect high value resources and assets. • Prescribed fire, manual, and mechanical treatments will be considered, and will most often take place within this FMU. (There is no designated wilderness in this FMU.)

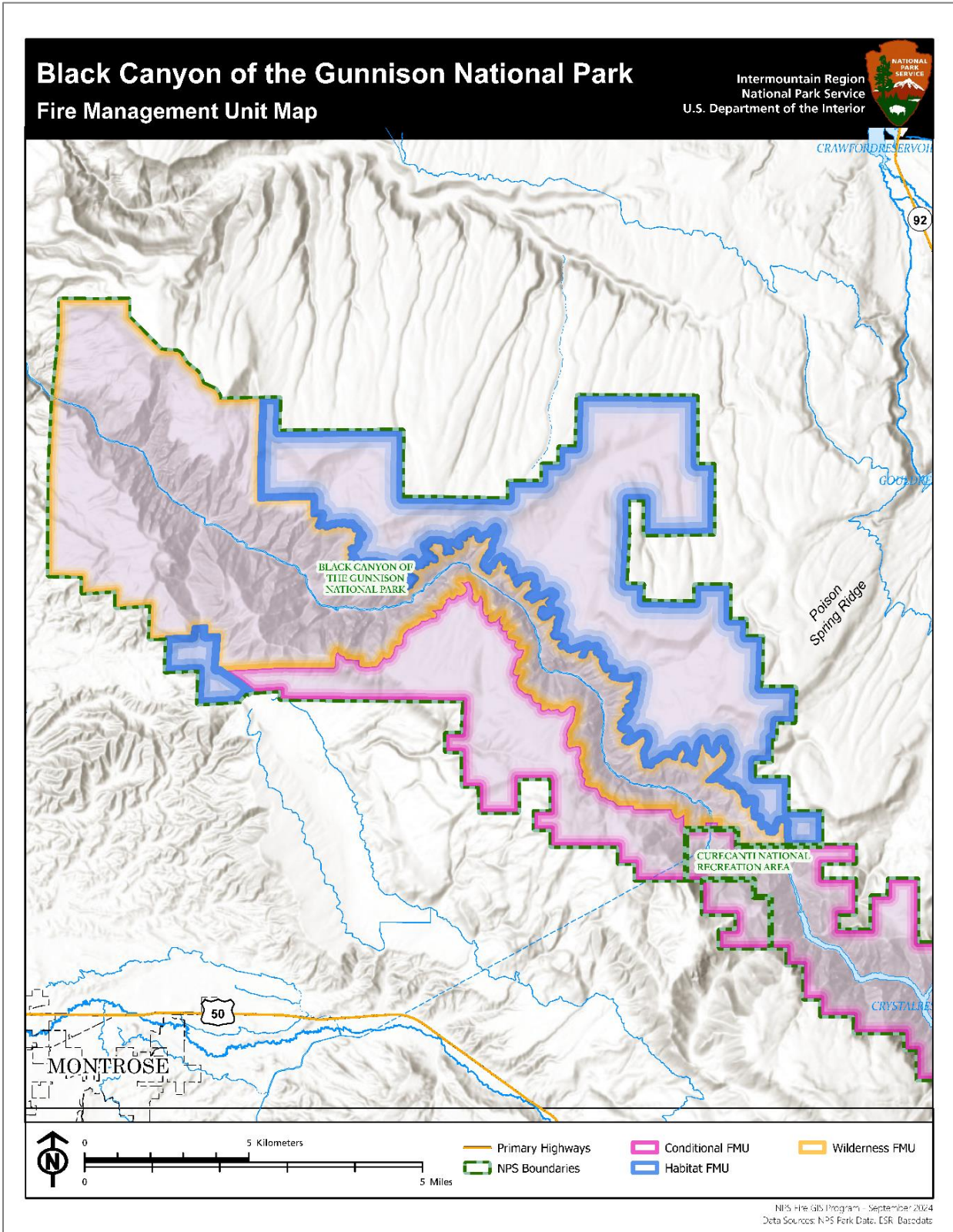


Figure 1. Map of Black Canyon FMUs.

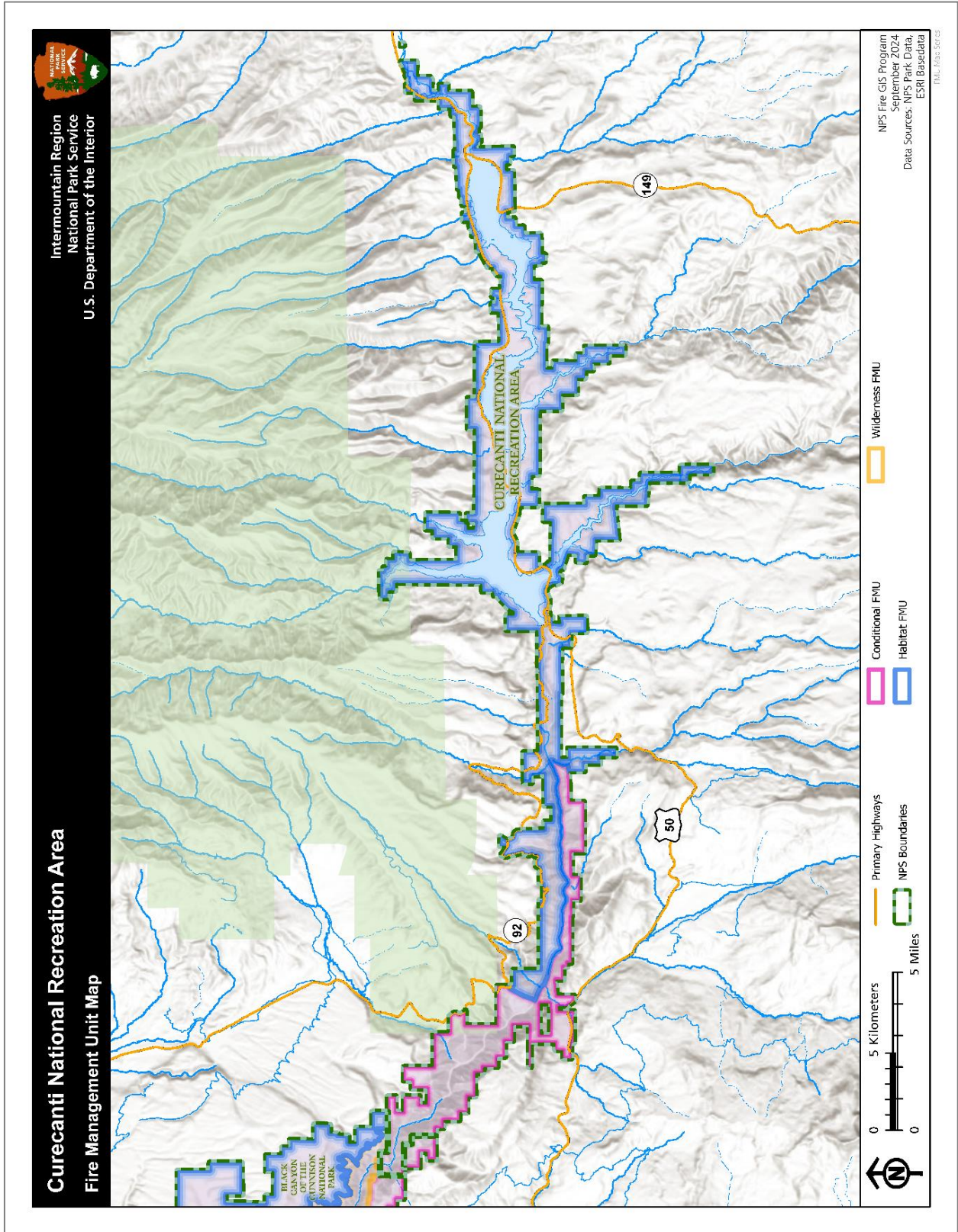


Figure 2. Map of Curecanti FMUs.

Common tools and strategies associated with the selected action will include the following:

- Helicopters and other aircraft to transport fire personnel, equipment, and water to wildfires, especially in remote locations.
- Wildfire engines and vehicles of various types (e.g., UTVs), depending on terrain and fire behavior, to transport fire personnel, equipment, and water to wildfires.
- Motorboats (within Curecanti) to transport fire personnel and equipment to wildfires.
- Hand tools such as chainsaws, axes, and shovels for removing fuels and for digging fire lines.
- Manage wildfires for risk, protection, and resource benefit objectives.
- Manual treatments using hand tools such as chainsaws, weed trimmers, lawn mowers, and other small equipment.
- Mechanical treatments using wheeled or tracked implements such as brush hogs, masticators, tractors, chippers, or other machinery.
- Prescribed (planned) fire as either a broadcast burn or pile burns.
- Herbicide treatments using backpack, handheld, or UTV sprayers.

Manual, mechanical, prescribed fire, and herbicide treatments will be completed to remove vegetation and create defensible space around highly valued resources and assets, improve or maintain species habitat, and/or to reduce the risk of negative effects from wildfire. They will range in size from a few acres to a few hundred acres and treatment areas will be left to the discretion of park and fire managers. An example of a typical treatment will be removal of vegetation, downed woody fuel, and limbing trees around infrastructure within the park units to create defensible space and reduce the risk of negative effects from wildfire. The goal of these types of treatments will be to create space around infrastructure and in the tree canopies to reduce the risk of fire spread. They will typically occur between 0-300 feet out from infrastructure, depending on building materials and the surrounding fuel type.

The park units will use a Fire Interdisciplinary Team (IDT) to discuss and prioritize proposed fuels treatment projects and review and provide input for treatment scopes of work. The Superintendent will have final signatory approval. The IDT will consist of managers from disciplines including, but not limited to, fire management, vegetation management, cultural resources, wilderness management, and wildlife. Use of motorized equipment would be subject to the wilderness programmatic MRA when applicable.

Criteria for fire managers and the IDT to determine if an area may be treated can include the following:

- Create defensible space in the wildland urban interface.
- Reduce the potential of a wildfire originating within Black Canyon or Curecanti and negatively impacting areas outside of the park units.
- Seek opportunities to protect high value resources and assets.
- Enhance cultural landscapes and viewsheds.
- Increase opportunities to manage wildfire as an ecological process within the Wilderness or Conditional FMUs.
- Restore vegetation, habitat, and/or fire regimes.

- Maintain previously treated areas.

Once it is determined which areas need to be treated, planned fuels treatment projects will be prioritized by fire managers with input from the IDT. Examples of criteria which may be used to prioritize treatments are below.

- Fuel loading and defensible space characteristics.
- Degree of impact on natural and cultural resources.
- Proximity to past wildfires.
- Logical project sequence with other planned projects.
- Maintenance cycles for previously treated areas.
- Practicality of implementation and cost effectiveness of treatment.
- Coordination efforts with adjacent land managers, grazing permittees, and private landowners.
- [NPSage](#) initiative projects.
- Cost to complete resource surveys for treatment area.

A treatment scope of work will be completed for all fuels treatments and will include the project's goals and objectives, best management practices, and treatment specifications.

The EA did not analyze specific project areas where these treatments will happen; however, as treatments are planned, they will be addressed through the IDT and additional site-specific compliance and analysis will be completed. This additional compliance may include Section 7 consultation with the United States Fish and Wildlife Service (USFWS), Section 106 consultation with the State Historic Preservation Office (SHPO), and tribes, as appropriate.

The following goals and objectives are included in the selected action.

Goal 1

Minimize risk to employees, responders, and the public during every fire management activity.

Goal 1 Objectives:

- Apply the most current risk management processes and strategic approaches in all decision making.
- Evaluate risks and ensure risk-based decisions are made at the appropriate level.
- Utilize Operational Leadership concepts to ensure the necessary steps are taken to understand the potential risks, severity, probability, and exposure of actions before engaging in wildland fire management.

Goal 2

Minimize adverse fire effects and impacts to highly valued resources and assets within and surrounding the park units.

Goal 2 Objectives:

- Use resource specialists on planned and unplanned fires to ensure highly valued resources and assets are identified and adverse impacts are reduced.
- Implement a wildfire prevention program to minimize human-caused fires.

- Identify, map, assess risk and impacts, and prioritize potential strategies for highly valued resources and assets.
- Reduce fire risk near and adjacent to infrastructure, private properties, and sensitive natural and cultural resources by prioritizing fuels treatments based on site specific information and an adaptive management process.
- Develop postfire rehabilitation plans using climate adapted strategies.

Goal 3

Foster and maintain a wildland fire management program that aligns with the park units' core purposes and promotes values of shared stewardship and collaboration.

Goal 3 Objectives:

- Coordinate with park divisions in wildfire response and fuels treatment planning to maximize program effectiveness.
- Respond to and manage all wildfires with interdisciplinary and interagency coordination.
- Cultivate and maintain external relationships through collaboration, communication, and coordination by fostering stewardship understanding and support among staff, stakeholders, partners, public, and tribes.
- Maintain a wildland fire program that increases workforce capacity, creates budget efficiencies, and enhances communication.

Goal 4

Promote ecological and social conditions that create, maintain, or restore fire-resilient landscapes.

Goal 4 Objectives:

- Use current science to guide an adaptive and innovative fire management program in uncertain climate futures.
- Use wildfires in Wilderness to provide opportunities to promote ecological integrity and preserve wilderness character.
- Use fuels treatments to create desired effects and manage fuel accumulations to meet resource objectives based on the best available science.
- Monitor, evaluate, and adjust fuel treatments to employ adaptive management techniques.
- Educate and communicate the intent and purpose of wildfire response and fuels treatments to the public, stakeholders, and employees.

Rationale for the Decision

Alternative B was selected because it best meets the project purpose and need without causing significant impacts to park resources. Because the former FMP is no longer valid, the only fire management option currently available is full suppression in response to wildfires, and no fuels treatments. Without the implementation of a valid FMP there is a higher risk of severe fires and negative impacts from suppression that can pose a risk to resources. The NPS determined that Alternative A, the no action alternative, does not meet the purpose and need for action, and will conflict with the park units' mission to preserve Black Canyon's and Curecanti's values and resources.

Best Management Practices

The selected action incorporates Best Management Practices (BMPs) listed in Appendix B of this document, and in the EA (Chapter 2, pages 11 and 18-19). The authority of the BMPs for this project comes from laws and policies, including:

- NPS Organic Act (54 U.S. Code § 100101)
- 1978 National Parks and Recreation Act
- Migratory Bird Treaty Act of 1918 (16 USC § 703-712)
- Endangered Species Act (ESA), as amended (16 USC § 1531 et seq.)
- National Environmental Policy Act (NEPA) (42 USC § 4321 et seq.)
- Department of the Interior NEPA Regulations (43 CFR Subtitle A Part 46)
- National Historic Preservation Act of 1966, as amended (54 USC 300101 et seq.)
- Wilderness Act (1964) (Pub. L. 88-577; 78 Stat. 890—96)
- Clean Water Act (CWA)
- NPS Management Policies 2006 (Chapters 4, 5, and 6)
- Departmental Manual – (516 DM 2)
- Director’s Order (DO) - 12 Conservation Planning, Environmental Impact Analysis, and Decision-Making
- DO - 14: Resource Damage Assessment and Restoration
- DO - 18: Wildland Fire Management
- DO - 41: Wilderness Stewardship
- DO - 58: Structural Fire Management

Agencies and Persons Consulted

Public Scoping Period

As part of the planning process, the NPS initiated a 30-day scoping period from September 3, 2024, through October 2, 2024. During this timeframe, the NPS received no correspondence or comments. A list of all agencies, organizations, tribes, and public contacted during this scoping period is provided in Appendix C of this document.

Public Comment Period

On January 7, 2025, the NPS released the Black Canyon and Curecanti FMP EA to the public for review and comment. It was available for public review until February 6, 2025. Members of the public were asked to submit comments electronically through the NPS Planning, Environment, and Public Comment (PEPC) website. The comment period was only virtual, and there were no public meetings held. Announcements were distributed to the public, organizations, agencies, and tribes. A list of all agencies, organizations, the public, and tribes contacted during the public comment period is provided in Appendix C of this document. The NPS received a total of eight comments in PEPC

during the public comment period and responses to substantive comments on the EA are included in Appendix D.

SHPO Consultation

The park units submitted a formal consultation letter to the Colorado SHPO on December 10, 2024, with a finding of No Adverse Effect for the undertaking. In a letter dated December 12, 2024, the SHPO acknowledged receiving the letter, did not have questions or comments on the proposed plan, and requested to be involved in the consultation process for future related undertakings as they are developed (e.g., any fuels treatments). The Colorado SHPO response letter is in Appendix F.

Tribal Consultation

Black Canyon and Curecanti consults with seven federally recognized tribes, which are listed in Appendix C. Consultation letters were sent to the seven Tribal Historic Preservation Officers (THPO) on December 19, 2024, inviting formal consultation on the proposed FMP. No input or concerns with the FMP or EA were received from any of the THPOs.

Project specific consultation with the SHPO and tribes will continue to take place for actions tiered to this programmatic EA to determine effects to cultural resources protected under the NHPA.

USFWS Consultation

Informal consultation with the U.S. Fish and Wildlife Service (USFWS) began in October 2024. A Biological Assessment and letter were submitted on April 4, 2025, to the USFWS in compliance with Section 7 of the ESA. The NPS determined the selected action ‘may affect, but is not likely to adversely affect’ the following species and designated critical habitat:

- Gray wolf (*Canis lupus*) – Experimental Population, Non-Essential
- Canada lynx (*Lynx canadensis*) – Federally Threatened
- Gunnison sage-grouse (*Centrocercus minimus*) – Federally Threatened
- Mexican spotted owl (*Strix occidentalis lucida*, MSO) – Federally Threatened
- Yellow-billed cuckoo (*Coccyzus americanus*, YBCU) – Federally Threatened
- Monarch butterfly (*Danaus plexippus*) – Candidate Species

The NPS determined ‘no effect’ for the following species because they do not occur in the action area and fire management actions will not alter downstream habitat or populations. The water in Curecanti reservoirs and Black Canyon is too cold to sustain populations of these species and they are presently extirpated. Potential downstream effects to the species may occur from the removal of more than 10 acre-feet of water per year (e.g., the de minimis threshold) for fire suppression activities within the park units, although this is not expected to happen.

- Bonytail (*Gila elegans*) – Federally Endangered
- Colorado pikeminnow (*Ptychocheilus lucius*) – Federally Endangered
- Humpback chub (*Gila cypha*) – Federally Threatened
- Razorback sucker (*Xyrauchen texanus*) – Federally Endangered

The NPS did not consider the following species because they did not have the potential to occur in the action area and they were not evaluated further:

- Silverspot (*Speyeria nokomis nokomis*) – Federally Threatened
- Clay-Loving Wild Buckwheat (*Eriogonum pelinophilum*) – Federally Endangered
- Colorado Hookless Cactus (*Sclerocactus glaucus*) – Federally Threatened

The USFWS concurred with the NPS determinations on May 19, 2025; USFWS concurrence is in Appendix G.

Potentially Affected Environment

Under the selected action, the project area is defined as the administrative boundaries of Black Canyon and Curecanti. The environmental contexts include the current and future expected conditions of the environment, including trends in conditions. The following topics have been considered in evaluating the degree of the effects for the selected action. Beneficial, adverse, and short- and long-term impacts of the proposed action are assessed for the resources below, and include vegetation and plant special status species, soils and paleontology, wildlife special status species, air quality, water quality and wetlands, and cultural resources. Please refer to Chapter 3 of the EA for a more detailed discussion of the affected environment and impacts.

Resource topics that were dismissed because they did not warrant a full analysis or were found to have no potential for significant impacts are discussed in detail in Appendix B of the EA.

Vegetation and Plant Special Status Species

Vegetation varies across Black Canyon and Curecanti. Pinyon-juniper communities are generally found in the western portions of Black Canyon and in smaller areas on the western portions of Curecanti. Sagebrush is found primarily at the lower elevation sites in Curecanti, but also in the lower elevations at Black Canyon. Mountain shrublands dominate the unforested upland areas of Black Canyon, occur on the canyon walls, and are also found in the western portions of Curecanti. Quaking aspen is found primarily in the western portions of Curecanti in areas with more moisture, and Douglas-fir communities are often found in steep drainages coming into the reservoirs and the Gunnison River Canyon where snow provides additional moisture.

There are several special status vegetation species. Although there are two potential federally listed species for the park units (the federally endangered clay-loving wild buckwheat, *Eriogonum pelinophilum*, and the federally threatened Colorado hookless cactus, *Sclerocactus glaucus*), they have never been documented in either park unit. Other special status species that occur in Black Canyon and Curecanti are primarily found on the steep canyon walls where wildland fire activities do not occur. There are non-native plant species of concern (cheatgrass, black henbane, bull thistle, Canada thistle, diffuse knapweed, Russian knapweed, tamarisk, yellow toadflax, and oxeye daisy) that are found throughout both park units.

Soils and Paleontology

The Black Canyon is primarily formed from metamorphic and igneous rocks, and soils are generally loams, rock outcrops, very stony loams, and clay loams. The Curecanti area was shaped by the erosion of the Gunnison River and includes some sedimentary rock as well as West Elk breccia formed from the volcanic activity of the West Elk Mountains. Soils in Curecanti are primarily loams to gravelly sandy loams.

Erosion risk for off-road, off-trail use ranges from slight to moderate throughout most of Curecanti and Black Canyon, with higher risk ratings closer to the canyon rim at Black Canyon and the western portions of Curecanti. Potential for damage by fire ranged from low to high throughout both park units according to the NRCS Web Soil Survey, with lower risk overall in Curecanti. Highest risk areas are in the far western portions of Black Canyon and below the south rim of the canyon in Black Canyon and Curecanti. The fragile soil index shows slightly fragile to fragile ratings for soils in both park units, with more fragile area in Black Canyon. The most fragile soils are found in the uplands and some drainages at Black Canyon and the western portions of Curecanti.

Curecanti also contains outcrops of the Morrison Formation, which has produced dinosaur fossils throughout the United States and Curecanti within the last 30 years. Fossils have included bones and teeth from sauropods, theropods, stegosaurus, turtles, crocodilians, and probable mammal material. Trace fossils including burrows of invertebrates have also been observed.

Wildlife Special Status Species

The USFWS maintains an online Information for Planning and Consultation site (IPaC), used to determine federally listed species, including threatened, endangered, and candidate species under the ESA, which may occur in Black Canyon and Curecanti. The following 11 species and critical habitats were identified:

- Gray Wolf (*Canis lupus*) – Experimental Population, Non-Essential
- Canada Lynx (*Lynx canadensis*) – Federally Threatened
- Mexican Spotted Owl (*Strix occidentalis lucida*) – Federally Threatened
- Yellow-billed Cuckoo (*Coccyzus americanus*) – Federally Threatened
- Gunnison Sage-grouse (*Centrocercus minimus*) – Federally Threatened, Critical Habitat
- Bonytail (*Gila elegans*) – Federally Endangered
- Humpback Chub (*Gila cypha*) – Federally Threatened
- Razorback Sucker (*Xyrauchen texanus*) – Federally Endangered
- Colorado Pikeminnow (*Ptychocheilus lucius*) – Federally Endangered
- Monarch Butterfly (*Danaus plexippus*) – Candidate Species
- Silverspot (*Speyeria nokomis nokomis*) – Federally Threatened

There are several other species of special interest to the NPS including the Gunnison's prairie dog (*Cynomys gunnisoni*), white-tailed prairie dog (*Cynomys leucurus*), bald eagles (*Haliaeetus leucocephalus*; State Special Concern), golden eagles (*Aquila chrysaetos*), American peregrine falcon (*Falco peregrinus anatum*; State Special Concern); prairie falcons (*Falco mexicanus*), pinyon jays

(*Gymnorhinus cyanocephalus*), great blue herons (*Ardea herodias*), and northern leopard frog (*Lithobates pipiens*; State Special Concern).

Air Quality

Black Canyon is classified as a Class 1 Air Quality Area under the Clean Air Act (Section 162(a)), and Curecanti is classified as a Class II Air Quality Area. The Clean Air Act is managed at the state level, so the park units must comply with state air quality regulations from the Colorado Department of Health and Environment.

The largest source of air pollution within the park units is from wildfires burning outside of the park units to the southwest and west, while other sources of pollution include emissions from vehicular traffic, and dust from unpaved roads. There are not currently any air quality monitoring stations within either park unit; however, the NPS participates in several national, multiagency air quality monitoring networks. Air quality parameters within the park units were most recently categorized as either good or fair, with 2013-2022 trends either unchanged, varied (up and down), improving, or deteriorating (NPS, 2024).

Water Quality and Wetlands

The Gunnison River flows east to west through Curecanti and Black Canyon, and there are three reservoirs (Blue Mesa, Morrow Point, and Crystal from east to west) that compose the Wayne N. Aspinall Storage Unit, which supplies hydroelectric power to Arizona, Colorado, New Mexico, Utah, and Wyoming. There is also one diversion (Gunnison Tunnel) at the western end of Curecanti which diverts water as a component of the Uncompahgre Valley Project, for irrigating the Uncompahgre Valley. Blue Mesa is the largest body of water in Colorado.

Curecanti also has an Outstanding Waters designation for many of the tributaries north of Blue Mesa Reservoir. With 20 water quality monitoring sites in three major (Lake Fork of the Gunnison River, Cebolla Creek, and Cimarron River) and 17 minor tributaries, the NPS conducts annual water quality monitoring for temperature, pH, specific conductance, dissolved oxygen, metals, nutrients, and *E. coli*. Compared to general and segment-specific water quality standards published by the State of Colorado in 5 CCR 1002 Regulations 31-37, water quality metrics generally met standards from 2001-2014 and were often stable or slightly improving throughout the park units.

There are 10,536 acres of wetlands (186 acres in Black Canyon and 10,350 acres in Curecanti), including freshwater emergent wetlands, freshwater forested/shrub wetlands, freshwater ponds, lake, and riverine habitats.

Cultural Resources

Black Canyon and Curecanti support evidence of Paleo-Indians from pre-9000 BCE to 6400 BCE, Archaic hunters from 6400 BCE to CE 1, migrations from the Four Corners area from CE 900-1100, and American Indians (Utes) starting in CE 1200-1300. Evidence indicates intermittent use of the

Upper Gunnison Basin beginning at the end of the Pleistocene, including stone tools, lithic scatters, projectile-points, brown ware, and wickiups (see pages 76 - 78 in EA for more information).

The Curecanti Archeological District was nominated to the National Register of Historic Places in 1981, and 80 sites constitute the nomination.

Euro-American sites for mining, ranching, logging, and railroad expansion camps began in the late 19th century. Portions of the Denver and Rio Grande Western narrow-gauge railroad, associated encampments, foundations, ovens, truss bridge, and railroad grade features are still present in areas of Curecanti. The truss bridge was built in 1895 and was listed on the National Register of Historic Places in 1976 as the last remaining structure representing narrow-gauge railroad.

There are 30 structures listed on the NPS List of Classified Structures for both park units. Historic structures include buildings with the former North Rim Ranger Station, tour road features, a South Rim overlook, a cemetery, a historic camp, the Denver and Rio Grande Western railroad and associated development, wickiups and hunting blinds, artifacts and lithic scatters, and culturally modified trees.

The Degree of Effects of the Action

As described in the EA and briefly summarized below, the NPS evaluated the reasonably foreseeable environmental effects, including the direct, indirect, and combined impacts of the selected action on vegetation and plant special status species, soils and paleontology, wildlife special status species, air quality, water quality and wetlands, and cultural resources (Chapter 3 of the EA). The analysis shows the selected action will not result in significant adverse impacts, and thus preparation of an environmental impact statement is not necessary.

Vegetation and Plant Special Status Species

The impacts of the selected action on vegetation during wildfires will have localized short-term negative impacts on vegetation but will have longer-term beneficial impacts by increasing heterogeneity in vegetation communities, eliminating accumulated heavy fuels, and adding nutrients to the soils. The reduction in fuel density and ladder fuels from prescribed fire, mechanical treatments, and herbicide treatments will have positive impacts to reduce wildfire intensity, spread rates, torching, individual plant mortality, and crown fires. The short-term adverse impact of treatments will include the removal of individual plants, which may last a few days to a few months, depending on the growth rates of plants involved. However, the beneficial impacts of these treatments, such as reduced fire risk in these communities, will last years to decades.

There are no known federally threatened or endangered plant species within Black Canyon or Curecanti; however, several populations of rare plants do occur in or near the park units. Known locations of rare plants are unlikely to be impacted given the topography they tend to inhabit, such as steep cliff walls in the canyon.

When the selected action is combined with other past, present, and reasonably foreseeable future actions, the expected overall impacts will result in positive effects to vegetation lasting several decades with limited and short-term negative effects lasting a few days to a few months.

Best management practices (see Appendix B) will be used during wildfires and planned fuels treatments to discourage the spread and invasion of non-native vegetation, and treatments may be designed to encourage native vegetation, therefore having positive impacts on native vegetation in the long-term. Because of the application of BMPs, limited and localized adverse effects, and long-term overall beneficial impacts, no significant impacts are anticipated to vegetation and plant special status species, and the potential for adverse effects will be reduced.

Soils and Paleontology

Impacts to soils will include soil disturbance from fire suppression activities such as fire personnel digging fire line, soil compaction from staging areas, social trails created by fire personnel accessing wildfires, and vehicles driving off-road. BMPs (Appendix B) and minimum impact strategies and tactics (MIST) will be employed to protect soil resources, and revegetation treatments will be conducted as needed to stabilize soils and vegetation. Prescribed fires, mechanical treatments, and herbicide treatments will be planned to minimize adverse effects on soil chemistry and erosion. The selected action will reduce fuels and fire intensity sufficiently to protect soils, with an overall long-term, beneficial effect on soils and erosion.

The impacts of the selected action to paleontological features from wildfires may include damage to fossils from the heat of a wildfire or destruction from fire suppression activities, such as digging fire line, retardant use, soil compaction from staging areas, social trails created by fire personnel accessing wildfires and driving vehicles off road. These impacts will be reduced with the use of BMPs and MIST tactics.

When the selected action is combined with other past, present, and reasonably foreseeable future actions, it may result in slight adverse impacts to paleontological resources and soils, lasting a few days to several years, which will be localized near project areas and areas of fire management activity. No significant impacts to soils and paleontological resources are expected from the selected action because of the application of BMPs and the use of MIST, revegetation treatments will be conducted as needed, and the positive impacts from nutrient recycling within the soil.

Wildlife Special Status Species

Under the selected action, some wildlife habitat may be impacted adversely from wildfires in the short-term, but the beneficial long-term impacts will include the reduction of larger and more severe wildfires due to fuels treatments. Proposed fuels treatments may alter vegetation structure and composition, increase resistance and resilience to wildfire and invasive plants, and protect from degradation of habitat, thus enriching wildlife habitat diversity. Treatments will be scheduled to avoid breeding and rearing seasons for most wildlife species, and outside of localized, short-term

adverse impacts due to noise or presence of fire personnel, wildlife will not be directly affected as most will temporarily move away from the wildfire or planned treatment.

When the expected adverse and beneficial impacts of the selected action are combined with other past, present, and reasonably foreseeable future actions, it will result in minor adverse impacts to wildlife which are expected to last a few hours to a few decades, depending on the species and their habitats, and will be localized near areas of wildfires or fuels treatments.

With the application of project BMPs (Appendix B) and MIST, the selected action will have an overall, long-term beneficial effect on wildlife species and habitats, although some species may have localized short-term negative impacts such as avoidance responses to disturbance from fire personnel and noise from mechanical treatments and no significant impacts to wildlife and special status species are expected. Sufficient habitat will likely remain to support special status wildlife species, and all wildland fire management activities will result in some beneficial impacts to wildlife habitat over a few years to several decades due to a more historically accurate fire return interval and severity.

Air Quality

The impacts from the selected action to air quality during wildfires will be adverse in the short-term, but beneficial in the long-term. Smaller, less severe wildfires can still affect viewsheds, smoke sensitive areas, and Class I Airsheds in Black Canyon, depending on the location of the wildfire and wind direction. These effects may last a few days to a few weeks dependent on the size and duration of the wildfire, but overall will be less impactful than large, severe wildfires.

In addition to wildfires, prescribed fire will occasionally effect air quality that may last a few hours to a few days, dependent on the vegetation burned. Prescribed fires will only take place on days with good smoke dispersion. The effects will be localized to areas downwind of the prescribed fire. In the short-term, the selected action will have the potential to increase smoke emissions due to not suppressing every wildfire and completing prescribed burns, however over the course of several years to decades wildfire impacts will lessen due to fewer large, severe wildfires and there will be beneficial effects to long-term air quality.

When the selected action is combined with other past, present, and reasonably foreseeable future actions within and surrounding the park units, it will result in slightly more negative impacts to air quality lasting a few days to a few weeks, however, could also contribute beneficial effects through fuel treatments that will offset negative impacts to air quality over longer timeframes (a few years to a few decades).

As described in the EA, with the implementation of BMPs, such as notifying potentially impacted neighboring landowners an agencies, visitors, and employees about the possibility of adverse air quality, and following all federal and state Clean Air Act laws, no significant impacts are anticipated to air quality.

Water Quality and Wetlands

The impacts from the selected action are expected to have minimal, short-term adverse effects on water quality and wetlands. BMPs will be used to minimize impacts (see Appendix B), including actions that will minimize damaging root systems or causing erosion, which could result in sedimentation in waterways. A buffer around wetlands will protect wetlands from impacts from mechanical, herbicide, and prescribed fire fuels treatments, such as compaction of soft soils, removal of vegetation that slows and filters water, or contamination from ash, herbicides, or other chemicals. By reducing fine fuels near wetlands, this action will reduce the potential for a severe wildfire. A severe wildfire could raise pH, and increase carbon, phosphorous, nitrogen, and micronutrient loads in waterways, which could exceed state water quality standards depending on the extent, proximity, and severity of the burn.

When the selected action is combined with other past, present, and reasonably foreseeable future actions within and surrounding the park units, minimal adverse impacts to water quality and wetlands will occur and will be localized to the areas (and downstream) of wildfires and prescribed fires, with impacts lasting from several days to several years. As described in the EA, with the implementation of BMPs, no significant impacts are anticipated and the potential for adverse effects on water quality and wetlands from future severe wildfires will be reduced.

Cultural Resources

The effects of wildfire on undiscovered surface artifacts will vary depending on fuel and fire behavior, and may include permanent damage to sites, features, and objects because of scorching, spalling, cracking, and charring in worst case scenarios. Suppression activities may harm undiscovered subsurface sites and items. Retardant drops and use of chemicals in or near archaeological sites may cause damage, and activities such as fire line construction may disturb and displace both surface and buried unknown archaeological resources. BMPs will be followed to mitigate damage to documented archaeological sites (Appendix B).

The potential for wildfire to impact historic districts, structures, and buildings will be reduced under the selected action due to the completion of fuels treatments that will create defensible space around cultural resources. The park units will implement several BMPs during fuels treatments to ensure impacts to cultural resources will be avoided or minimized. Fuels treatments will remove vegetation adjacent to and within archeological sites which will have long-term benefits to these resources by reducing fuel loading and fire severity during a wildfire.

When the selected action is combined with other past, present, and reasonably foreseeable future actions within and surrounding the parks, impacts to cultural resources may last a few weeks to perpetuity, and range from damage and exposure to severe destruction. Due to the established avoidance BMPs, the risk of potential impacts on all cultural resources will be reduced so impacts will be negligible or minor and not significant, with overall outcomes creating more beneficial conditions for cultural resources.

Degree to Which the Selected Action Affects Public Health and Safety

There will be no significant impacts on public health and safety. During fuels reduction and wildfire suppression activities, the risks include direct exposure to fire, hazards such as falling trees, and increased presence of vehicles and equipment, limited means of ingress and egress, changes in weather and fire behavior, and smoke.

The NPS will implement measures to protect visitors, employees, and fire personnel. Fire personnel will comply with required safety procedures when conducting prescribed fire, fuels treatments, and fire suppression activities. In the event of a large wildfire, the park units will be evacuated and closed to visitors to reduce risks to public health and safety.

The NPS will inform and restrict the public from active work areas and burn units to ensure their safety during fuels reduction activities. The NPS will follow requirements under smoke permits issued by the state of Colorado when conducting prescribed fires to minimize air quality effects on the public health and safety. Over the long term, wildfire and fuels reduction in the parks will reduce the risk of large and severe wildfires within the park units, benefitting public health and safety.

Effects That Will Violate Federal, State, Tribal, or Local Law for the Protection of the Environment

Implementation of the NPS selected action does not violate any applicable federal, state, or local law or requirements imposed for the protection of the environment. The selected action will not violate any provision or requirement identified under legislation addressing Black Canyon of the Gunnison National Park, Curecanti National Recreation Area, the Organic Act, or any other subsequent legislation.

Degree to Which the Potential Effects on the Human Environment are Highly Uncertain

The impacts of the NPS selected action are well researched and documented for wildland fire activities, including wildfires, prescribed fire, and non-fire fuel treatments. This includes research and data related to when wildfires may start, and common weather scenarios that create predictable fire behavior. Although wildfires are not planned events, prescribed fire and fuels reduction treatments are planned, and the impacts are predictable and routine.

Conclusion – Finding of No Significant Impact

As described above, the NPS has determined the selected action does not constitute a major federal action meeting the criteria that normally requires preparation of an environmental impact statement (EIS).

Based on the analysis provided in the EA, the selected action will not have a significant effect on the human environment in accordance with Section 102(2)(c) of NEPA. This finding is based on consideration of the Council on Environmental Quality and NPS guidance on the criteria for significance, regarding the potentially affected environment and degrees of effects of the impacts described in the EA (which is hereby incorporated by reference), and as summarized above. Based on the foregoing, it has been determined an EIS is not required for this project, and, therefore, will not be prepared.

Appendix A. References

U.S. National Park Service. (2024). Park Conditions and Trends. Retrieved from [https://www.nps.gov/subjects/air/park-conditions-trends.htm?tabName=summary&parkCode=BLCA¶mCode=Overall%20Air%20Quality&startYr=2009&endYr=2022&monitoringSite=WEMI1%20\(IMPROVE\)&timePeriod=Summary](https://www.nps.gov/subjects/air/park-conditions-trends.htm?tabName=summary&parkCode=BLCA¶mCode=Overall%20Air%20Quality&startYr=2009&endYr=2022&monitoringSite=WEMI1%20(IMPROVE)&timePeriod=Summary)

Appendix B. Best Management Practices

- The Superintendent must approve the use of heavy equipment (e.g., bulldozers, graders, masticators, etc.) and driving off established roads for wildfire suppression purposes.
- The Superintendent must approve the use of retardant within the park units unless there is an immediate threat to life and property.
- The Superintendent must approve the use of aircraft removing water from Gunnison River, Lake Fork of the Gunnison River, Blue Creek, Curecanti Creek, Coal Creek, and West Elk Creek unless there is an immediate threat to life and property. These waterways are managed as a Wild and Scenic River. (Section 7 (b) of Wild and Scenic Rivers Act).
- [Minimum Impact Strategies and Tactics \(MIST\)](#) will be used on all wildfire incidents.
- If it must be used, retardant will not be used within 300 feet of bodies of water.
- Ground protection for refueling and maintenance activities with vehicles, pumps, and other equipment, and refueling at least 200 feet from water sources will be used.
- All resource personnel, vehicles and equipment will arrive at the fire location with personal protective equipment (PPE), vehicles, tools, and equipment clean and free of invasive vegetation species and seeds.
- Fire personnel will minimize line construction by taking advantage of water, natural barriers, rock outcrops, trails, roads, and streams.
- Fire personnel will only limb along fire lines when necessary.
- A resource advisor will be assigned to and present on wildfires.
- Water will only be used from reservoirs within the park units (to prevent the introduction of aquatic invasive species).
- All helicopter water buckets will be cleaned and free of aquatic invasive species prior to use on any park waterway.
- All helicopters and other fire suppression equipment will avoid a quarter mile buffer from May 1 – July 30 around the Neversink/Cooper Ranch area on the eastern side of Curecanti to protect a heron rookery.
- Helicopters and other fire suppression equipment will avoid a quarter mile buffer March 1 – July 30 around the East Elk Creek Campground area to protect a bald eagle nest. If additional eagle nests are found to be occupied during yearly monitoring, those sites will be provided to fire personnel.
- Suppression repair and post-fire rehabilitation will be completed as needed to reduce any long-term impacts.
- The Black Canyon/Curecanti programmatic Minimum Requirement Analysis (MRA) will be followed for all fire management actions within wilderness. Any action that falls outside of the approved FMP programmatic MRA will require an additional MRA analysis and associated NEPA compliance.
- Slash will not be piled in riparian areas, wetlands, or ephemeral drainages.

- To reduce impacts to waterways and aquatic ecosystems, projects will not be scheduled during spring runoff or times when rains are often heavy, projects will not be scheduled during spawning periods especially in known spawning beds, and projects will avoid riparian areas.
- Fuels treatments will be designed to avoid impacts to threatened, endangered, or other special status plant and animal species.
- Where the presence of any listed endangered or threatened species is expected, a resource specialist will be consulted as to the need for surveys to determine species occupancy. If species are determined to be present, additional steps will be taken to reduce negative impacts.
- Pedestrian Class III archaeological surveys will be conducted and consultation with the Colorado State Historic Preservation Office (SHPO) and tribes on the identification of properties and treatment options will occur as necessary before implementing any prescribed burns, manual, or mechanical treatments. Adverse impacts on eligible or potentially eligible cultural resources will be avoided during treatment layout and implementation, in coordination with a NPS archaeologist.
- Prior to treatments, staff will reference existing park information on potential fossil localities and formations to determine the sensitivity for the presence of paleontological resources. If there is potential for rare, unusual, or scientifically important fossils to be affected, areas will be surveyed for fossils and treatment will be avoided where they are found.
- All fuels treatments will avoid a quarter mile buffer from May 1 – July 30 around the Neversink/Cooper Ranch area on the eastern side of Curecanti to protect a heron rookery.
- All fuels treatments will avoid a quarter mile buffer from March 1 – July 30 around the East Elk Creek Campground area to protect a bald eagle nest. If additional eagle nests are found to be occupied during yearly monitoring, those site locations will be provided to fire personnel.
- Landowners or agencies located adjacent to treatment areas will be contacted, and a press release may be issued.
- Employees and visitors will be informed of treatments and any special safety warnings if a treatment may affect them or is visible to visitors.
- Personnel will arrive at the project area with PPE, vehicles, tools, and equipment clean and free of plant materials.
- All flagging will be removed at the end of the treatment.
- Work will be stopped immediately if unknown or unsurveyed cultural or natural resources are located.

Appendix C. List of Agencies, Organizations, Public, and Tribes Contacted During Public Comment Periods

The following agencies and organizations were contacted and invited to participate in the planning and comment process.

- U.S. Fish and Wildlife Service (USFWS)
- Colorado State Historic Preservation Office (CO SHPO)
- Bureau of Land Management (BLM), Southwest District
- BLM, Gunnison Gorge National Conservation Area
- U.S. Forest Service (USFS) Grand Mesa, Uncompahgre and Gunnison National Forest
- U.S. Bureau of Reclamation (USBR)
- Colorado Parks and Wildlife
- Crawford State Park
- Gunnison County, Colorado
- Montrose County, Colorado
- San Miguel County, Colorado
- Ouray County, Colorado
- Montezuma County, Colorado
- Colorado Tourism Association
- Crested Butte Chamber of Commerce
- Gunnison Chamber of Commerce
- Montrose Chamber of Commerce
- Gunnison-Crested Butte Tourism Association
- Montrose Tourism Office
- Western National Parks Association
- Friends of Black Canyon and Curecanti
- Ridgway Tourism
- Durango Tourism
- Ouray Tourism
- Montrose Tourism
- Blue Mesa LLC
- Absentee-Shawnee Tribe
- Pueblo of Jemez
- Southern Ute Indian Tribe
- Ute Indian Tribe
- Ute Mountain Ute Tribe
- White Mesa Ute Tribe
- Navajo Nation

Appendix D. Errata and Response to Public Comments

Fire Management Plan Environmental Assessment Black Canyon of the Gunnison National Park and Curecanti National Recreation Area

The following errata and responses to selected public comments, together with the FONSI and the EA, describe the final decision of the NPS for the Black Canyon and Curecanti FMP.

Errata

In reference to changes to the EA, the topic heading and page number are shown in underlined italics. Original text from the EA is included to provide context and to allow for comparison to the text change. Additions to the text are show in **bold** and deleted text is show in ~~striketrough~~.

Text changes to the EA have been made for the following reasons:

- Clarifying when helicopter water buckets will be cleaned.
- Clarifying there is a programmatic MRA in place, and Black Canyon's wilderness is not recommended, it is designated.

Page 11, bullet #12 (fifth from last bullet), Alternative A BMPs.

- All helicopter water buckets would be cleaned and free of aquatic invasive species **prior to use on any park waterway.**

Page 11, bullet #16 (last bullet), Alternative A BMPs.

- **The Black Canyon and Curecanti programmatic** Minimum Requirement Analysis (MRA) would be ~~completed~~ **followed** for all ~~suppression~~ **fire management** actions within ~~recommended~~ wilderness.

Page 16, addition of a bullet, Alternative B under common tools and strategies.

- **Motorboats (within Curecanti) to transport fire personnel and equipment to wildfires.**

Substantive Comments and NPS Responses

The NPS must consider all comments that are timely received. The standard NPS practice is to respond to substantive comments submitted during the public review period of the EA. Substantive comments raise, debate, or question a point of fact or analysis. Comments that merely support or oppose a proposal or that merely agree or disagree with NPS policy are not considered substantive and do not require a formal response. This section summarizes comments received during public review of the EA that are substantive or otherwise warranted a response. Comments are condensed into the following concern statements, and a response to each statement is provided below.

1. **Concern Statement:** NPS employees should have proper training on the use of herbicides to ensure aquatic systems are protected.

NPS Response: Per the Federal Insecticide, Fungicide, and Rodenticide Act §11 and §12, and the 40 CFR §171.201, all federal employees that are herbicide applicators will be properly trained and, wherever necessary, certified to use restricted use pesticides. All herbicides will be labeled pursuant to 40 CFR §156 including warnings, precautionary statements, directions for use, and restrictions such as proximity of an application to water bodies. Herbicide application in the park units follow applicable labels, regulations, and laws to minimize risk to aquatic systems. The NPS authorizes herbicide use through a rigorous evaluation in the Pesticide Use Proposal System (PUPS), with review by park and regional subject matter experts.

2. **Concern Statement 2:** The NPS should consider mapping out areas where it is safe to use herbicides.

NPS Response: The project area consists of two entire park units. Mapping areas where it is safe to use herbicides would require data from over 60,000 acres, cross-referenced to many potential herbicides. Each herbicide is individually labeled for its environmental risk and requirements for application per 40 CFR §156. Such a complex, cross-referenced analysis is beyond the scope of this programmatic EA and is more appropriately considered through individual treatment actions where both the habitat and herbicide are more definitively known. The NPS authorizes herbicide use through a rigorous evaluation in the Pesticide Use Proposal System (PUPS), with review by park and regional subject matter experts.

3. **Concern Statement 3:** The NPS should consider setting seasonal guidelines for prescribed fires.

NPS Response: The EA is programmatic in nature and fuel treatment implementation (which includes prescribed fire) will be based on the objectives, current and projected fuel conditions, weather, climate, political, and social environments at the time. The dynamics of the environmental, political, and social landscape requires the Superintendent, fire managers, and resource managers have all fire management strategies available to them for each individual prescribed fire to ensure the best timeframes are chosen for resources, values at risk, and desired fire effects.

Appendix E. Non-Impairment Determination

By enacting the NPS Organic Act of 1916 (Organic Act), Congress directed the US Department of the Interior and the National Park Service (NPS) to manage units “to conserve the scenery, natural and historic objects, and wildlife in the System units and to provide for the enjoyment of the scenery, natural and historic objects, and wildlife in such manner and by such means as will leave them unimpaired for the enjoyment of future generations” (54 USC 100101). *NPS Management Policies 2006*, Section 1.4.4, below, explains the prohibition on impairing park resources and values:

“While Congress has given the Service the management discretion to allow impacts within parks, that discretion is limited by the statutory requirement (generally enforceable by the federal courts) that the Park Service must leave park resources and values unimpaired unless a particular law directly and specifically provides otherwise. This, the cornerstone of the Organic Act, establishes the primary responsibility of the National Park Service. It ensures that park resources and values will continue to exist in a condition that will allow the American people to have present and future opportunities for enjoyment of them.”

An action constitutes impairment when its impacts “harm the integrity of park resources or values, including the opportunities that otherwise will be present for the enjoyment of those resources or values” (NPS 2006, Section 1.4.5). To determine impairment, the NPS must evaluate the resources and values that will be affected; the severity, duration, and timing of the impact; the direct and indirect effects of the impact; and the cumulative effects of the impact in question and other impacts. An impact on a park unit resource or value may constitute impairment, but an impact would be more likely to constitute an impairment to the extent that it affects a resource or value whose conservation is:

- Necessary to fulfill specific purposes identified in the establishing legislation or proclamation of the park unit.
- Key to the natural or cultural integrity of the park units or to opportunities for enjoyment of the park units.
- Identified in the park units’ general management plan or other relevant NPS planning documents as being of significance (NPS 2006, Section 1.4.5).

Fundamental resources and values for Black Canyon of the Gunnison National Park and Curecanti National Recreation Area are identified in their enabling legislation, the Black Canyon of the Gunnison National Park Foundation Document, and the Curecanti National Recreation Area Foundation Document. Based on a review of these documents, fundamental resources and values at Black Canyon that are specifically relevant to the Fire Management Plan include recreation, the Gunnison River, Wilderness, native plant and wildlife communities, and spectacular views. Fundamental resources and values at Curecanti that are specifically relevant to the Fire Management Plan include archeology, geology and paleontology, aquatic resources, recreation, scenic views, and riparian plant and wildlife communities.

A non-impairment determination has been prepared for each impacted resource that was carried forward for detailed analysis in the EA. These topics include vegetation and plant special status species, soils and

paleontology, wildlife special status species, air quality, water quality and wetlands, and cultural resources. A non-impairment determination is not necessary for recreation and wilderness because these are not generally considered a park resource or value subject to the non-impairment standard (see NPS 2006, section 1.4.6).

This non-impairment determination has been prepared for the selected action, as described in the *Finding of No Significant Impact for the Black Canyon of the Gunnison National Park and Curecanti National Recreation Area Fire Management Plan*.

Vegetation and Plant Special Status Species

The selected action will have localized short-term negative impacts on vegetation during wildfires but will have longer-term beneficial impacts by increasing heterogeneity in vegetation communities, eliminating accumulated heavy fuels, and adding nutrients to the soils. The reduction in fuel density and ladder fuels from prescribed fire, mechanical treatments, and herbicide treatments will have positive impacts to reduce wildfire intensity, spread rates, torching, individual plant mortality, and crown fires. The short-term adverse impact of treatments will include the removal of individual plants, which may last a few days to a few months, depending on the growth rates of plants involved. However, the beneficial impacts of these treatments, such as reduced fire risk in these communities, will last years to decades.

There are no known federally threatened or endangered plant species within Black Canyon or Curecanti; however, several populations of rare plants do occur in or near the park units. Known locations of rare plants are unlikely to be impacted given the topography they tend to inhabit, such as steep cliff walls in the canyon.

Best management practices (see Appendix B) will be used during wildfires and planned fuels treatments to discourage the spread and invasion of non-native vegetation, and treatments may be designed to encourage native vegetation, therefore having positive impacts on native vegetation in the long-term. Because of BMPs, limited and localized adverse effects, and long-term overall beneficial impacts, the NPS has determined the selected action will not result in impairment of Black Canyon's and Curecanti's vegetation and plant special status species because they will continue to be present for the enjoyment of current and future generations.

Soils and Paleontology

Impacts to soils will include soil disturbance from fire suppression activities such as fire personnel digging fire line, soil compaction from staging areas, social trails created by fire personnel accessing wildfires, and vehicles driving off-road. BMPs (Appendix B) and MIST will be employed to protect soil resources, and revegetation treatments will be conducted as needed to stabilize soils and vegetation. Prescribed fires, mechanical treatments, and herbicide treatments will be planned to minimize adverse effects on soil chemistry and erosion. The selected action will reduce fuels and fire intensity sufficiently to protect soils, with an overall long-term, beneficial effect on soils and erosion.

The impacts of the selected action to paleontological features from wildfires may include damage to fossils from the heat of a wildfire or destruction from fire suppression activities, such as digging fire line, retardant use, soil compaction from staging areas, social trails created by fire personnel accessing wildfires and driving vehicles off road. These impacts will be reduced with the use of BMPs and MIST tactics.

Soils and paleontological resources in Black Canyon and Curecanti will be present for the enjoyment of current and future generations because BMPs and MIST will be used, revegetation treatments will be conducted as needed, and the positive impacts from nutrient recycling within the soil due to fire. Therefore, there will be no impairment of soils and paleontological resources.

Wildlife Special Status Species

Under the selected action, some wildlife habitat may be impacted adversely from wildfires in the short-term, but the beneficial long-term impacts will include the reduction of larger and more severe wildfires due to fuels treatments. Proposed fuels treatments may alter vegetation structure and composition, increase resistance and resilience to wildfire and invasive plants, and protect from degradation of habitat, thus enriching wildlife habitat diversity. Treatments will be scheduled to avoid breeding and rearing seasons for most wildlife species, and outside of localized, short-term adverse impacts due to noise or presence of fire personnel, wildlife will not be directly affected as most will temporarily move away from the wildfire or planned treatment.

With the application of project BMPs (Appendix B) and MIST the selected action will have a long-term beneficial effect on wildlife species and habitats, although some species may have localized short-term negative impacts such as avoidance responses to disturbance from fire personnel and noise from mechanical treatments and no significant impacts to wildlife and special status species are expected. Sufficient habitat will likely remain to support special status wildlife species, and all wildland fire management activities will result in some beneficial impacts to wildlife habitat over a few years to several decades due to a more historically accurate fire return interval and severity. Therefore wildlife special status species will be present for the enjoyment of current and future generations, and the selected action will not result in impairment of Black Canyon or Curecanti wildlife special status species.

Air Quality

The impacts from the selected action to air quality during wildfires will be adverse in the short-term, but beneficial in the long-term and will not result in impairment. Smaller, less severe wildfires can still affect viewsheds, smoke sensitive areas, and Class I Airsheds in Black Canyon, depending on location of the wildfire and wind direction. These effects may last a few days to a few weeks dependent on the size and duration of the wildfire, but overall will be less impactful than large, severe wildfires.

In addition to wildfires, prescribed fire will occasionally effect air quality that may last a few hours to a few days, dependent on the vegetation burned. Prescribed fires will only take place on days with good smoke dispersion. The effects will be localized to areas downwind of the prescribed fire. In the short-term, the selected action will have the potential to increase smoke emissions due to not suppressing every

wildfire and completing prescribed burns, however over the course of several years to decades wildfire impacts will lessen due to fewer large, severe wildfires and there will be beneficial effects to long-term air quality.

As described in the EA, with the implementation of BMPs, such as notifying potentially impacted neighboring landowners, agencies, visitors, and employees about the possibility of adverse air quality, and following all federal and state Clean Air Act laws, the selected action will preserve the Class I airshed for the enjoyment of current and future generations, and will not result in impairment to the air quality of Black Canyon and Curecanti.

Water Quality and Wetlands

The impacts from the selected action are expected to have minimal, short-term adverse effects on water quality and wetlands. BMPs will be taken to minimize impacts (see Appendix B), including actions that will minimize damaging root systems or causing erosion, which could result in sedimentation in waterways. A buffer around wetlands will protect wetlands from impacts from mechanical, herbicide, and prescribed fire fuels treatments, such as compaction of soft soils, removal of vegetation that slows and filters water, or contamination from ash, herbicides, or other chemicals. By reducing fine fuels near wetlands, this action will reduce the potential for a severe wildfire. This would reduce the potential for severe wildfires to raise pH, and increase carbon, phosphorous, nitrogen, and micronutrient loads in waterways, and could avoid exceeding state water quality standards depending on the extent, proximity, and severity of the burn.

As described in the EA with the implementation of BMPs, adverse effects on water quality and wetlands from future severe wildfires will be reduced and because these resources will continue to present for the enjoyment of current and future generations, the selected action will not result in impairment to water quality and wetlands within Black Canyon and Curecanti.

Cultural Resources

The effects of wildfire on undiscovered surface artifacts will vary depending on fuel and fire behavior, and may include permanent damage to sites, features, and objects because of scorching, spalling, cracking, and charring in worst case scenarios. Suppression activities may harm undiscovered subsurface sites and items. Retardant drops and use of chemicals in or near archaeological sites may cause damage, and activities such as fire line construction may disturb and displace both surface and buried unknown archaeological resources. BMPs will be followed to mitigate damage to documented archaeological sites (Appendix B).

The potential for wildfire to impact historic districts, structures, and buildings will be reduced under the selected action due to the completion of fuels treatments that will create defensible space around cultural resources. The park units will implement several BMPs during fuels treatments to ensure impacts to cultural resources will be avoided or minimized. Fuels treatments will remove vegetation adjacent to and within archeological sites which will have long-term benefits to these resources by reducing fuel loading and fire severity during a wildfire.

Due to the established avoidance BMPs, the risk of potential impacts on all cultural resources will be reduced so impacts will be negligible or minor, with overall outcomes creating more beneficial conditions for cultural resources. Because cultural resources will continue to be present for the enjoyment of present and future generations within Black Canyon and Curecanti, the selected action will not result in impairment.

Conclusion

This analysis was guided by best available science, advice from subject matter experts and others who have relevant knowledge and experience, and the results of public involvement activities. The NPS has determined that implementation of the selected action will not constitute impairment of the resources or values of Black Canyon of the Gunnison National Park nor Curecanti National Recreation Area. This conclusion is based on the park units' purposes and significances, fundamental resources and values, a thorough analysis of the environmental impacts described in the plan/EA, comments provided by the public and others, and the professional judgment of the decision-maker, guided by the direction of *NPS Management Policies 2006*.

Appendix F. SHPO Response Letter



History Colorado

December 12, 2024

James West
Superintendent
Black Canyon of the Gunnison National Park
and Curecanti National Recreation Area
102 Elk Creek
Gunnison, CO 81230
forest_frost@nps.gov

RE: Preparing a Fire Management Plan for Black Canyon of the Gunnison National Park and Curecanti National Recreation Area, Gunnison and Montrose Counties, CO (HC# 85422)

Dear Mr. West,

Thank you for your correspondence received by our office on December 10, 2024 providing a copy of the Fire Management Plan for Black Canyon of the Gunnison National Park (BLCA) and Curecanti National Recreation Area (CURE) for our review. Our office has reviewed the submitted materials, and we offer the following comment.

Assessment of Adverse Effects

We do not have questions or comments regarding the document in general at this time. We understand that the Plan comprises nondestructive project planning for potential future actions and projects that have the potential to cause effects to historic properties, and does not restrict subsequent consideration of alternatives, according to 36 CFR 800.1(c). Your letter and the provided documentation note that BLCA and CURE will consult with our office on any undertakings that may stem from this Plan under Section 106 of the National Historic Preservation Act (NHPA) as plans for these actions and projects are developed. We look forward to consulting with you regarding these proposed undertakings under Section 106 of the NHPA.

We request being involved in the consultation process with the local government, which as stipulated in 36 CFR 800.3 is required to be notified of the undertaking, and with other consulting parties. Additional information provided by the local government or consulting parties might cause our office to re-evaluate our eligibility and potential effect findings. Please note that our compliance letter does not end the review period provided to other consulting parties.

Thank you for the opportunity to comment. If you have any questions, please contact Matthew Marques, Section 106 Compliance Manager, at (303) 866-4678, or matthew.marques@state.co.us.

Sincerely,

Dr. Holly Kathryn Norton

Digitally signed by Dr. Holly Kathryn Norton

Date: 2024.12.18 11:46:09 -07'00'

(for) Dawn DiPrince
State Historic Preservation Officer

History Colorado | 1200 Broadway | Denver, CO 80203 | 303-447-8679
HistoryColorado.org

Appendix G. USFWS Concurrence



Colorado Field Office
445 W. Gunnison Ave, Ste 240
Grand Junction, CO 81501

Project Code:
2024-0142329

The U.S. Fish and Wildlife Service concurs with your determinations that the described project is not likely to adversely affect listed species or critical habitat listed under the Endangered Species Act of 1973, as amended (16 U.S.C. 1531 et seq.). Contact this office if the project changes, new information becomes available about effects to listed species, or if new species or critical habitat are listed.

NATHAN DARNALL
Western Colorado Supervisor

Digitally signed by
NATHAN DARNALL
Date: 2025.05.19
12:48:43 -0600

FIRE MANAGEMENT PLAN Biological Assessment

Black Canyon of the Gunnison National Park

and

Curecanti National Recreation Area

February 10, 2025

National Park Service – U.S. Department of Interior

Prepared by:

Theresa Childers
Wildlife Biologist
Black Canyon of the Gunnison National Park and Curecanti National Recreation Area

Aleshia Rummel
Environmental Protection Specialist
Black Canyon of the Gunnison National Park and Curecanti National Recreation Area

Reviewed/Approved by:

Rebecca Smith
IMR Northern Zone Fire Planner
Yellowstone National Park

Joy Logan
Acting Fire Management Officer
Dinosaur National Monument

Submitted to:

Stuart West
Superintendent
Black Canyon of the Gunnison National Park and Curecanti National Recreation Area

JAMES WEST Digitally signed by JAMES WEST
Date: 2025.04.04 09:12:45 -06'00'

Stuart West, Superintendent

Date