



United States Department of the Interior

NATIONAL PARK SERVICE

Congaree National Park
100 National Park Road
Hopkins, South Carolina 29061

IN REPLY REFER TO:

**FINDING OF NO SIGNIFICANT IMPACT
ON THE
ENVIRONMENTAL ASSESSMENT FOR
CONTINUATION OF A WILDLAND FIRE SUPPRESSION AND
PRESCRIBED WILDLAND FIRE PROGRAM
AT
CONGAREE NATIONAL PARK**

DECISION AND RATIONAL:

The decision is to continue a wildland fire suppression and prescribed wildland fire program at the Congaree National Park, as proposed in the Congaree National Park Wildland Fire Management Plan FY2004. Implementation of this plan will allow for the highest level of protection to human life, property, and natural and cultural resources from damage caused by wildland fire. Prescribed wildland fires will be used to reduce hazardous fuel loadings, improve wildlife habitat, promote wilderness conditions in accordance with wilderness management guidelines, and simulate natural fire processes. Ongoing research into the natural role and effects of fire in both floodplain and Pine Bluff ecosystems dynamics will also be encouraged. Prescribed natural wildland fire will continue to be researched to substantiate implementation at the Park in order to attain a more natural environment, reduce hazardous fuel loadings, and improve wildlife habitat with emphasis on the protection of human life, property, and natural and cultural resources. Current staffing and funding limitations prevent a bonafide prescribed wildland natural fire program from being fully administered until staffing levels are increased to enable full internal control.

The fire management program is consistent with National Park Service laws, regulations, and policies and supported by the Park's enabling legislation (Public Law 94-545 of October 1976), which states that the Park was established:

“To preserve and protect for the education, inspiration, and enjoyment of present and future generations an outstanding example of a near-virgin southern hardwood forest situated in the Congaree River floodplain in Richland County, South Carolina.”

Through passage of Public Law 100-524, expansion of the Park by an additional 6,840 acres in October of 1988 brought the Park up to approximately 22,200 acres. This additional legislation also supports the fire management program and solidifies the primary management goals of the Park by designation:

“...as wilderness and therefore as components of the National Wilderness Preservation System. Such lands shall be known as the Congaree Swamp National Monument Wilderness...and shall be managed in accordance with the wilderness act.”

The park's Resource Management Plan (Draft 2002), along with the General Management Plan (1988), identify visitor safety and protection of property as a high priority for resource management and include provisions for prescribed fire and continued research to determine the natural role of fire in the Park's ecosystems.

ALTERNATIVES CONSIDERED AND RATIONALE FOR REJECTION:

Full Suppression

Under this alternative, all fires, regardless of cause, would be suppressed through direct attack utilizing a control strategy. There would be no management ignited prescribed fire allowed. Hazard fuel reduction may be completed with the use of labor and mechanical equipment only. Full suppression does not eliminate the potential for excessive resource impact and large conflagration fires. High intensity fires could still burn in such a manner that suppression effort could only attempt to reduce the negative impacts until burning conditions would allow for effective suppression. Additionally, as unburned fuels built up over time the potential for higher intensity fires could increase due to the enhanced fuel load. Additionally, fire dependent ecosystems would be severely retarded due to the continued lack of fire in the woodlands.

Prescribed Fire Only

Under this alternative, prescribed fire would be utilized to accomplish resource management goals of restoring the natural pattern of fire within the Park's ecosystem. Like other types of disturbances, e.g., hurricanes, droughts, floods, etc..., fire is a natural part of the evolution of biotic communities. Prescribed fire would also be used to accomplish hazard fuel management, along with labor and mechanical equipment, as appropriate. Prescribed fire would reduce the risks to the Park's natural and cultural resources and adjacent private property, should a wildland fire occur. Additionally, prescribed fire would be used to carry out other management objectives such as exotic species control and wildlife habitat enhancement. All other ignitions would be suppressed through direct attack utilizing a control strategy regardless of cause or location.

Prescribed fire only would not allow for the incorporation of prescribed natural fire within the Park at any time. Natural fire dependent ecosystems would suffer through the elimination of fire effects that are unattainable through prescribed fire alone.

Wildland Fire Use for Resource Benefit Only

Under this alternative, naturally occurring fires, such as those caused by lightning, would be allowed to burn in portions of the Park under predetermined conditions that are favorable to the management of the fire. Predetermined conditions or prescriptions refer to very specific parameters that include wind speed and direction, temperature, relative humidity, fuel moisture and maximum allowable burn area. All of these parameters have well defined acceptable ranges that may not be exceeded and are carefully monitored in order for a naturally occurring fire to be allowed to progress. If a wildland fire used for resource benefit were to exceed these parameters it would be reclassified as an escaped wildland fire and suppressed. All other fires would be suppressed and prescribed fire would not be utilized.

This alternative is not a viable option at the Park at this time due to the lack of enough onsite fire personnel, proximity to urban interface and commercial timberland area, and lack of fire history documentation in the floodplain area (FMU 4).

Abandonment of Fire Management

Under this alternative, all fires, regardless of cause, would be allowed to burn with no effort to suppress or mitigate the fire impacts. This alternative fails to meet Agency policy and responsibility and raises the potential for losses of life and property, as well as unacceptable resource impacts. This alternative was summarily rejected and is no longer considered.

REVIEW OF THE ENVIRONMENTAL ASSESSMENT:

The Environmental Assessment for the Congaree National Park Wildland Fire Management Plan was released to the public along with the Draft Fire Management Plan for a 30 day review period beginning August 27, 2003. More than 75 letters with instruction for downloading or acquiring a copy of the documents were mailed to individuals, agencies and groups. Additionally, copies were available for review at the park's visitor center and available for download on the park's website.

Two letters of comment were received and are summarized as follows:

1. As relates to compliance with Section 106 of the National Historic Preservation Act of 1966, the South Carolina Department of Archives & History (SCDAH) states: "For the most part it appears that fire management activities are likely to have minimal impacts on the known cultural resources within the Congaree Swamp National Monument (CSNM)." The SCDAH also goes on to "...recommend that the documents be more explicit about the status of site identification efforts at the CSNM and how cultural site information is managed."

Response: We have updated section 10 (Protection of Sensitive Resources) of the Congaree National Park Wildland Fire Management Plan (WFMP) with more specifics of the known cultural resources and guidelines on mitigation including the "lining" around or wetting down of known cultural sites prior to any burning activities. Additionally the Minimum Requirement Analysis Worksheet (appendix 13.3.3 of the WFMP) has been updated to reflect

the inclusion of cultural resources in the programmatic environmental compliance for those areas of the park that are proposed to be burned within the next five years.

On all wildland fire events, natural or prescribed, minimum impact tactics will be taken, as documented in the WFMP and the Minimum Requirement Analysis Worksheet (appendix 13.3.3 of the WFMP). It must be noted that prior evaluation of all areas where fireline may need to be constructed is not always possible due to the unknown factor of when and where, natural or arson, wildland fires will occur.

Specific cultural site management, outside the sphere of fire, are not intended to be a part of the WFMP and specific locations of known cultural sites within the monument are not included in the WFMP or the associated environmental assessment for security reasons. Additional information on these subjects can be found in the park's resource management plan and within the park's resource files.

2. As relates to compliance with Section 7 of the Endangered Species Act (as amended in 1973), the United States Fish and Wildlife Service concurs that the Congaree National Park Wildland Fire Management Plan is in compliance with Section 7 of the Endangered Species Act (as amended in 1973) and poses no threat to endangered species protection.

Additionally, the United States Fish and Wildlife Service states that the obligations of Section 7 of the Endangered Species Act (as amended in 1973) "...must be reconsidered if: (1) new information reveals that the proposed action may affect listed species in a manner or to an extent not previously considered, (2) the proposed action is subsequently modified to include activities which were not considered during this consultation; or (3) new species are listed or critical habitat designated that might be affected by the proposed action."

MITIGATION REQUIREMENTS:

Mitigation requirements for the implementation of the Congaree National Park Wildland Fire Management Plan, as indicated in the Impact Mitigation for the Proposed Action section of the Environmental Assessment are as follows:

Protection of Wilderness Resources

All suppression activities and all mechanical or prescribed wildland fire actions will be subject to a minimum requirements determination to ascertain whether the action is necessary and appropriate in wilderness or potential wilderness. If the action is both necessary and appropriate to protect wilderness resources and values, the action will be further analyzed to determine the minimum tool necessary to accomplish the objectives of the proposed action. Whenever possible, the Park will use minimum impact suppression tactics to minimize or prevent damage to wilderness. For a more complete discussion of minimum impact suppression tactics, see Appendix A of the environmental assessment.

Protection of Cultural Resources

In order to protect unknown cultural resources, all constructed fireline on prescribed and wildland fire activities at the park will be accomplished through the use of primitive tools (rakes, shovels, etc...), blowers and handsaws and/or chainsaws. In no case will the disturbance of the ground be greater than a scraping off of the duff and litter layers to expose the mineral soil. This would also include the removal of surface roots from vegetation exposed through the removal of the duff and litter layer. Only in a matter of significant resource protection, authorized by the superintendent, or in a matter of life and death would mechanical methods, such as plows, be used to construct fireline. Additionally, all suppression activities and all mechanical or prescribed wildland fire actions will be subject to a minimum requirements determination to ascertain whether the action is necessary and appropriate in wilderness or potential wilderness. If the action is both necessary and appropriate to protect wilderness resources and values, the action will be further analyzed to determine the minimum tool necessary to accomplish the objectives of the proposed action. Whenever possible, the Park will use minimum impact suppression tactics to minimize or prevent damage to wilderness.

Protection of Rare or Endangered Species

Species adversely impacted by fire and listed as rare, threatened or endangered would be protected from wildland fire or prescribed wildland fire. Whenever possible, minimum impact suppression tactics will be used to prevent habitat or species destruction (see Appendix A). Monitoring and inventorying of burn unit areas will be completed prior to burning to identify any potential impacts to rare, threatened or endangered species.

Hazard Fuels Management

Resources that could be negatively affected by mechanical or prescribed wildland fire actions will be protected to the fullest extent possible. Monitoring and inventorying of hazard fuel reduction sites will be completed prior to fuel management activities to identify any potential impacts to rare, threatened, endangered or otherwise sensitive species or resources.

Air Quality and Smoke Management

Suppression and prescribed wildland fire management actions will comply with the "Smoke Management Guidelines" of South Carolina and in accordance with all-applicable policy guidelines, laws and regulations. Prescribed wildland fire plans will include smoke mitigation constraints.

Water Resources (Water Quality, Wetlands, Floodplains)

During fire suppression, no fire retardant will be used in the floodplain under any circumstances. Elsewhere in the Park, water will be used in lieu of fire retardant whenever possible. If fire retardant must be used, a non-fugitive type will be chosen, and bodies of water will be avoided. Stream crossings will be limited to set and existing locations. Following fire suppression activities, fire lines will be re-contoured, water barred, and seeded with native plant species where appropriate and as necessary.

Visitor Use; Human Health and Safety

Regardless of the fire type, wildland fire or prescribed wildland fire, all sites upon which a fire event is occurring will be closed to the public and appropriate enforcement controls will

be put in place. If portions of the Park are safe for use during fire events, visitors will be directed to those areas. Park neighbors and local residents will be notified of any fire management events that have the potential to impact them. Smoke on roadways will be monitored and traffic control provisions will be taken to ensure motorist safety during fire events at the park.

Suppression Tactics

Minimum impact suppression tactics will be used to the fullest extent possible to prevent unwarranted resource damage. Rehabilitation of fire-lines or other constructions will be done at the earliest possible time permitted by the extent and behavior of the fire.

Environmentally Preferred Alternative

The environmentally preferred alternative is determined by applying criteria set forth in NEPA, as guided by direction from the Council on Environmental Quality (CEQ). The CEQ has stated that the environmentally preferred alternative is the alternative that will promote the national environmental policy as expressed in NEPA, Section 101. This includes alternatives that:

- Fulfill the responsibilities of each generation as trustee of the environment for succeeding generations;
- Assure for all generations safe, healthful, productive, and esthetically and culturally pleasing surroundings;
- Attain the widest range of beneficial uses of the environment without degradation, risk of health or safety, or other undesirable and unintended consequences;
- Preserve important historic, cultural, and natural aspects of our national heritage and maintain, wherever possible, an environment that supports diversity and variety of individual choice;
- Achieve a balance between population and resource use that will permit high standards of living and a wide sharing of life's amenities; and
- Enhance the quality of renewable resources and approach the maximum attainable recycling of depletable resources.

The NPS has determined that the environmentally preferable alternative is Alternative A (Combined Fire Program / No-Action, Preferred Alternative) because it surpasses the other action alternatives in realizing the fullest range of national environmental policy goals as stated above. Alternative A would:

- Reduce fuel loadings to a level that would mimic the behavior of natural, fire-adapted conditions, and enhance the protection of resources for succeeding generations.

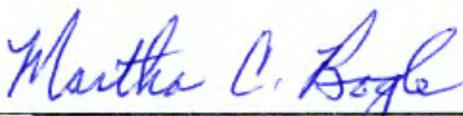
- Improve the safety, healthfulness, and esthetics of the surroundings.
- Reduce risks to health and safety and other undesirable consequences of wildland fire.
- Restore dominance of fire-adapted plant communities.
- Provide better protection of natural and cultural resources.

To a greater extent than the other alternatives, Alternative A would reduce the risk of wildland fire while protecting and restoring Park resources and values. Alternative A would allow for a gradual landscape transition to what would have been normal historically by promoting the use of prescribed fire to reduce fuel loads and mimic historic fire regimes. Alternative A would also allow for the quick suppression of human caused arson and dangerous natural fires that could cause safety concerns or instill drastic changes to the landscape too quickly to be taken advantage of by the ecosystem. Therefore, Alternative A is the environmentally preferred alternative.

CONCLUSION:

Based on the findings in the environmental assessment and the public comment process, the National Park Service has determined that implementation of the decision to continue a wildland fire suppression and prescribed fire program at the Congaree National Park will not have a significant impact on the human and natural environment. Therefore, preparation of an environmental impact statement is not required.

MANAGEMENT RECOMMENDATION AND APPROVAL:

		
Recommended:	Martha C. Bogle, Superintendent Congaree National Park	Date

		
Approved:	Patricia Hooks, Regional Director Southeast Region	Date