

1. FOUNDATION OF THE FMP

1.1 RELATIONSHIP OF THIS DOCUMENT TO THE FMP EA AND FONSI

Federal agencies that manage large tracts of public land having vegetation capable of sustaining wildland fire are required by federal wildland fire management policy to develop FMPs that comply with federal environmental regulations, such as NEPA, and to ensure that the FMPs be updated periodically to keep current with changes in federal policy. The Monument's FMP addresses the implementation strategy selected by the NPS Pacific West Regional Director through the signing of the FONSI at the conclusion of the NEPA process for the FMP. The FMP provides a framework for all fire management activities and the management of wildfires and prescribed fire as a tool to safely accomplish protection and resource management objectives on Monument lands managed by the NPS.

The FONSI that concluded the Monument's NEPA process is Appendix C to this FMP; the Mitigation Measures adopted through that FONSI are Appendix D. Together these documents summarize the findings of the EA regarding the selected fire management strategy, describe the decision taken and the decision-making process and list the specific procedures to protect the environment the NPS will follow when implementing projects under the FMP and to the extent feasible, when suppressing wildfires. The FMP provides specific implementation detail grounded in the goals, objectives and implementation strategy developed in the NEPA process and circumscribed by the Monument's commitment to the public and regulators to abide by the mitigation measures adopted through the FONSI.

NPS fire management actions must conform to adopted plans and policies of the Department of the Interior and the NPS. These include the Federal Wildland Management Policy, NPS Management Policies (2006), NPS Director's Order #18 (2005b) and Reference Manual #18 (2006b), the latter two references constituting the NPS' guidance documents for wildland fire management. The FMP must also conform to planning, management and policy documents for the Monument that are in place and legally binding.

1.2 RELATIONSHIP OF THE FMP TO FEDERAL POLICY AND GUIDANCE

1.2.1 Federal Wildland Fire Management Policy (2001)

In 2001, the Interagency Federal Wildland Fire Policy Review Working Group revised and updated the Federal Wildland Fire Management Policy (NIFC 2001), which applies to all federal land management agencies. The key element of the policy is that firefighter and public safety is the first priority. In addition, the policy states that fire, as a critical natural process, will be integrated into land and resource management plans and activities on a landscape scale, and across agency boundaries. The policy also directs that fire management plans and programs will be based on a foundation of sound

CHAPTER 1 – FOUNDATION OF THE FMP

science. Research will support ongoing efforts to increase our scientific knowledge of biological, physical, and sociological factors.

1.2.2 National Park Service Management Policies (2006)

NPS adopted revised Management Policies on August 31, 2006 which update the 2001 Management Policies under which the FMP NEPA process was conducted. In Section 4.5, the 2006 Management Policies expand the scope of issues that specifically need to be addressed in FMPs to include:

- “determining in which situations natural regeneration of a burned ecosystem is appropriate and when management actions are needed to restore, stabilize, or rehabilitate an area following wildland fire”,
- “addressing the need for adequate funding and staffing to support the planned fire management program”,
- address[ing] strategies for preventing the accumulation of hazardous fuels *in specific areas* and for eliminating hazardous conditions that may have developed over time due to past fire suppression programs or ongoing development activities. These strategies will entail strategic planning, interdisciplinary coordination, and inter-organizational collaboration as needed to provide appropriate treatment using adaptive management practices that range from site specific to landscape level. “
- Measures to protect or rescue cultural resources in the event of an emergency, disaster, or fire will be developed as part of a Monument’s emergency operations and fire management planning processes (Section 5.3.1.1.)

The Management Policies direct each unit managed by the NPS to carefully consider the option of wildland fire use based on the specific environmental, safety and logistical conditions of each wildland fire. Monument staff carefully considered the option of wildland fire use in developing the FMP EA and concluded that the Monument will be a full suppression NPS unit employing Minimum Impact Tactics (MIT) to the extent possible and a flexible suppression strategy that permits the appropriate approach to be used to suppress a fire (confine, contain or control) based on input from resource advisors, suppression forces, and adjacent landowners. MIT procedures, previously known as MIST (minimum impact suppression tactics), can be found in Appendix H, Part 11.

All fire management plan requirements in the revised Management Policies that are not currently addressed in the FMP will be developed and adopted in subsequent FMP Annual Review processes. In addition, once the current NEPA process is completed for the 1,967-acre Pinnacles Ranch, the fire management strategy selected for these newly acquired lands will be added to the FMP as part of the annual review process. Sections that are incomplete at present will be added in the future through the review process. These include the research plan, monitoring plan and education and outreach plan.

Excerpts from 2006 NPS Management Policies, Section 4.5, Fire Management

Regarding Fire Management Plans: “Parks with vegetation capable of burning will prepare a fire management plan that is consistent with federal law and departmental fire management policies, and that includes addressing the need for adequate funding and staffing to support the planned fire management program. The plan will be designed to guide a program that:

- responds to the park’s natural and cultural resource objectives;
- provides for safety considerations for park visitors, employees, and developed facilities;
- addresses potential impacts on public and private neighbors and their property adjacent to the park; and
- protects public health and safety.

Regarding Overall Strategy: “All fires burning in natural or landscaped vegetation in parks will be classified as either wildland fires or prescribed fires. All wildland fires will be effectively managed through application of the appropriate strategic and tactical management options. These options will be selected after comprehensive consideration of the resource values to be protected, firefighter and public safety, and costs.”

Regarding Wildland Fire Suppression: “All wildland fires will be effectively managed through application of the appropriate strategic and tactical management options as guided by the park’s fire management plan. These options will be selected after comprehensive consideration of the resource values to be protected, firefighter and public safety, costs, availability of firefighting resources, weather, and fuel conditions. “

“All parks will use a systematic decision-making process identified in their fire management plans or other documents to determine the most appropriate management strategies for all unplanned ignitions and for any naturally or management-ignited fires that are no longer meeting resource management objectives.”

1.2.3 Director’s Order #18, Wildland Fire Management (2005b)

Director’s Order #18, Section 5(2)(a), builds on the requirement from the Federal Wildland Fire Management Policy and reiterated in the NPS Management Policies that, “Every park area with burnable vegetation must have a fire management plan approved by the Superintendent.” Director’s Order #18 (NPS 2005b) specifically addresses the direction and content expected in the FMPs prepared for NPS units.

The FMPs will:

1. Reinforce the commitment that firefighter and public safety is the first priority.

CHAPTER 1 – FOUNDATION OF THE FMP

2. Describe wildland fire management objectives that are derived from land, natural, and cultural resource management plans and address public health issues and values to be protected.
3. Address all potential wildland fire occurrences and consider the full range of wildland fire management actions.
4. Promote an interagency approach to managing fires on an ecosystem basis across agency boundaries and in conformance with the natural ecological processes and conditions characteristic of the ecosystem.
5. Include a description of rehabilitation techniques and standards that comply with resource management plan objectives and mitigate immediate safety threats.
6. Be developed with internal and external interdisciplinary input and reviewed by appropriate subject matter experts and all pertinent interested parties, and approved by the park superintendent.
7. Comply with the NEPA and any other applicable regulatory requirements.
8. Include a wildland fire prevention analysis and plan.
9. Include a fuels management analysis and plan.
10. Include procedures for short and long term monitoring to document that overall programmatic objectives are being met and undesired effects are not occurring.

Director's Order #18 requires that a Reference Manual be prepared to "help NPS managers and field staff understand and implement Departmental and NPS policies applicable to fire management. The reference manual will contain detailed procedures emphasizing personnel safety, the use of wildland fire for beneficial purposes, monitoring of smoke behavior and the concept of risk management." The Reference Manual for DO #18 is published only online and is available at http://www.nps.gov/fire/fire/fir_wil_pla_reference18.cfm.

1.3 RELATIONSHIP OF FMP TO PINNACLES PLANNING

1.3.1 Status of New Lands

In 2000, 8,000 acres of BLM lands were added to the Monument bringing the total acreage up to 24,436 acres with 16,048 acres (roughly 65% of the Monument) designated as wilderness. The FMP EA was prepared while the Monument was at this size. As the FONSI was being prepared to finalize the EA, the Monument increased further in size with the addition of the 1,936-acre Pinnacles Ranch. To avoid having to completely restart the NEPA process for the FMP, the FONSI was finalized without addressing fire management actions for the lands of the former Pinnacles Ranch. A separate NEPA process was begun in January 2007 to address fire management planning for this area which, when completed, will serve to update the Pinnacles FMP to include all lands within the current Monument boundary.

1.3.2 Pinnacles General Management Plan

The Monument is currently in the initial stages of preparing a general management plan (GMP) which will describe the long-term vision and direction for management and development of the Monument during the coming 15 – 20 years. The GMP will identify the desired future conditions for natural and cultural resources and visitor experience, in order to guide the Monument's staff as they decide how best to protect cultural and natural resources while providing a high quality visitor experience.

The current GMP for the Monument was completed in 1976 and describes the chaparral ecosystem as an "environment [that] provides a rich educational and research opportunity for the visitor to study extremely specialized plant and animal communities of a type not preserved anywhere else in the National Monument System." According to the GMP however, successful fire suppression "has resulted in an unnaturally dense and over-mature vegetative cover over most of the monument". One of the goals outlined in the GMP is to establish an adequate program of fire control and investigate the feasibility of introducing controlled wildfire as a natural element within the chaparral system. The FMP, recently developed through a public NEPA process and reviewed by regulatory agencies, is considered as reflecting the current state of knowledge on the fire ecology of the chaparral community and replaces the fire management guidance in the 1976 GMP.

A public process was begun in 1998 to develop a GMP but halted until the transfer of Pinnacles Ranch was finalized in March 2006. Given the amount of time elapsed since 1998, the Monument reopened the public scoping period for the GMP to solicit public input on issues to be covered in the GMP and feedback on draft foundation and purpose statements for the GMP.

The foundation and purpose statements revisit the intentions of the President in establishing the Monument as a national park and provide a foundation for consideration of future management and use of these lands. The NPS has also developed significance statements defining what is most important among the Monument's resources and values. The following draft purpose statement was distributed to the public in the February 2007 GMP Newsletter:

"The purpose of Pinnacles National Monument is to protect the volcanic Pinnacle Rocks formation, talus caves, associated lands and ecosystems that are of scientific and educational value, by caring for their natural processes and wild character for the benefit and inspiration of all."

The public scoping period for the GMP extends through May 31, 2007.

1.3.3 Pinnacles Natural and Cultural Resource Management Plan

The Natural and Cultural Resources Management Plan (RMP) was completed in December 1999. The RMP identifies and describes the natural and cultural resources preserved within the monument, the threats to these resources, as well as the ongoing or potential management activities required for their preservation. A wide variety of research initiatives, baseline studies, and manipulative and protective techniques are

integrated into a comprehensive resource management program to meet the objectives established for the RMP.

From a fire perspective, the RMP promotes perpetuating the coastal chaparral communities through the reintroduction of the natural processes, such as fire, that have been suppressed by humans. The RMP includes analysis and a ranking of resource management needs and problems and calls for a multi-year program for achieving measurable progress on the proposed actions. RMP strategy targets the elimination of exotic plant and animal species from the Monument when native species are threatened.

The RMP recommends that natural fire season frequency (May through October), and intensity should be duplicated as close as possible if prescribed burning is to be used to reintroduce fire into the ecosystem. Managers should periodically review current literature in order to better understand the role of fire in the ecosystem of the Monument. The Fire Management Plan requires updating to reflect current knowledge of fire effects in chaparral and the management practices and direction of the fire program (NPS 2005, Page 21).

The RMP provides background on the fire management history of the Monument up to its date of publication in 1999. At that time, research was questioning whether chaparral was fire dependent or survived in spite of fire. The concept, that chaparral has not evolved with fire but instead persists in spite of it, contrasts drastically with the conclusions of much of the research that has been done in the 70s and 80s. In 1999, the burn interval was thought to be somewhere near 30-40 years. This burn cycle was interrupted by full suppression within the Monument and repeated prescribed burning in the same areas resulting in localized vegetation type conversion (NPS 2005, Page 31).

As described in the RMP in 1999, the Monument's FMP needed to be updated. The management strategy for the earlier FMP included creating a buffer zone around the entire boundary of the Monument to allow wildland fire use within its boundaries. The buffer was never built due to the infeasibility of ever clearing that much land of vegetation whether using prescribed burning, mechanical methods or both. The buffer area probably would have type converted and could have become a weedy area with even higher fire hazard. (NPS 2005, Page 32 - 36).

1.3.4 Cultural Landscape Report

The Cultural Landscape Report identified 5 potential cultural landscapes within the Monument—Chalone CCC Camp, Lyons Homestead, Pinnacles East Entrance District, Pinnacles Ranch, and Pinnacles Trail System. Of these, all but the Pinnacles Ranch have received some level of field documentation and at least preliminary statements of significance.

The Pinnacles Trail System cultural landscape encompasses the recreational trail network and associated features (e.g., comfort stations, Bear Gulch Dam) developed by between 1923 and 1941, mainly by the Civilian Conservation Corps (CCC) and the NPS (Fitzgerald and Provencher, 2001). Although the boundaries of the landscape have not been formally defined, portions fall within all of the FMUs identified in each alternative.

CHAPTER 1 – FOUNDATION OF THE FMP

The Pinnacles Trail System cultural landscape has been recommended to be eligible for listing on the National Register of Historic Places (NRHP).

A large number of significant structures are located within the NRHP-eligible, 797-acre Pinnacles East Entrance District, located in the east-central portion of the Monument. The District encompasses monument roads, and the Chalone, Condor Gulch, Bear Gulch, and Moses Springs developed areas, and is associated with early monument development between 1923 and 1941 (Provencher et al., 2002). Importantly, and in addition to the structural components, vegetation is a contributing characteristic to the Pinnacles District. In the 1930s and 1940s, the CCC and NPS made plantings of native species around buildings and along roads in order to restore natural conditions (following building and road construction and a 1931 wildfire) and minimize erosion. While distinguishing planted and natural vegetation is difficult today, the heavily vegetated areas surrounding buildings and along roads stand in strong contrast to the open landscape seen in photographs of the 1930s and 1940s (see photo below).

A total of 42 structures are listed on the List of Classified Structures (LCS) for the Monument, 31 of which have been determined eligible for listing on the NRHP. This list is included in the FMP as Appendix G. Another nine have not been formally evaluated, while two others were determined to lack eligibility but are still managed as cultural resources. These range from buildings to smaller scale elements such as retaining walls and trails. All Monument structures lie within the Developed Area FMU identified in the preferred alternative with the exception of trails and a couple of other features.



Replanted fill slope along Bear Gulch Road, ca. 1936 (Pinnacles National Monument Archives)

Many structures in the Monument are constructed of a combination of flammable (weatherboard, wood shakes) and nonflammable (fieldstone, concrete) materials. None of the historic structures contains external or internal sprinkler systems, although hazard fuel removal in the form of prescribed

burning and manual thinning has been regularly performed around most developed areas. Due to the presence of flammable structures (weatherboard) and the nature of surrounding fuels (chaparral), the structures in the Bear Gulch (sited in a narrow canyon) and Chalone areas are generally considered to be at greatest risk from wildland fire.

CHAPTER 1 – FOUNDATION OF THE FMP

Projects under the FMP may be used to create defensible space for historic structures. Fuel loading along roads and structures must be vetted with cultural resource staff to ensure that fuel reduction projects would not impact significant features that contribute to the potential cultural landscape.

1.4 RELATIONSHIP OF FMP TO LOCAL FIRE MANAGEMENT PLANNING

1.4.1 San Benito County Community Wildland Fire Protection Plan (CWPP)

The San Benito County FireSafe Council has been leading an effort to develop a Community Wildland Fire Protection Plan (CWPP) for San Benito County. Some of the stakeholders in the CWPP include the California Department of Forestry and Fire Protection (CDF) San Benito – Monterey Unit, the Bureau of Land Management (BLM), the US Forest Service (USFS), the Cattleman's Association, local landowners, local government and local county fire agencies. County fire agencies involved include the Hollister Fire Department, Aromas Tri-County Fire Protection District, and the San Juan Bautista Volunteer Fire Department. Monument staff has attended several CWPP meetings including the public meeting held in November 2006 to introduce and discuss the CWPP. The BLM FMO is a primary stakeholder in the CWPP process and also represents the interests of the NPS in this effort.

1.4.2 CDF 2005 Fire Plan for the San Benito – Monterey Unit

The California Department of Forestry and Fire Protection (CDF) San Benito-Monterey Unit is located along the central coast between San Luis Obispo County on the south and Santa Cruz and Santa Clara counties on the north. The Pacific Ocean abuts the western side of the Unit, and the Diablo Mountains and the San Joaquin Valley lie to the east. The Unit encompasses 2.1 million acres of State Responsibility Area (SRA), representing one of the largest state responsibility jurisdictions in CDF. There are approximately 700,000 acres of Federal, State and Local government land, some of which are protected by CDF contractually or by agreement with a Federal agency.

The Unit is operationally divided into four divisions and thirteen battalions or programs. The Unit has eleven state-funded fire stations, six local government stations, thirteen volunteer companies, one air attack base, one Helitack base, and a CDF/California Department of Corrections (CDC) inmate conservation camp. Additionally, the unit has Cooperative Fire Protection Agreements with seven local fire protection agencies.

The primary goal of the 2005 San Benito - Monterey Unit Fire Plan is to prevent the ignition and spread of unwanted, human-caused fires with an emphasis on reducing losses as a result of large damaging fires. Using fire history, fuels data, weather data, and assets at risk, the unit has identified several target areas as indicated in this document. Proactive pre-fire suppression activities and public information and education programs are key elements of this plan.

The Monument is referenced in the CDF Plan as having primarily brush vegetation (Fuel Model 4), similar to other parts of the foothills east of the Salinas Valley and in the mountains west of the Salinas Valley throughout the coastal range. Brush is found