



**Comment 2-1.** Please revise Draft EIS text on page 31 to conform with BAAQMD Regulation 5 which does not allow the movement of vegetation debris to a central location for pile burning unless approved by the Air Pollution Control Officer.

**Response to Comment 2-1.** Draft EIS text on page 31 is revised as follows in the Final EIS:

“Tools used for these tasks include weed-whackers, chain saws, pole saws, and a chipper towed to the site by a truck. Vegetation debris can be cut up and broadcast in the immediate area, or piled and bumed. Debris that is not broadcast on site is chipped and hauled to Beebe Ranch and stockpiled. In accordance with BAAQMD Regulation 5, debris piles are burned at could only be burned at Beebe Ranch with the approval of the Air Pollution Control Officer. Chipped material is not burned.”

**Comment 2-2.** Please revise Draft EIS text on page 34 to include reporting wildland fires to BAAQMD.

**Response to Comment 2-2.** Draft EIS text on page 34 is revised as follows in Final EIS:

“In the event of wildland fire, the P/FIO would work closely with visiting FIOs who may be part of Incident Management Teams to assure the park message is delivered accurately and effectively. Wildland fires will also be reported to the BAAQMD as soon as possible. Media and public queries would receive prompt replies and would contain information about the fire, the fire management plan, and ecosystem restoration as appropriate.”

**Comment 2-3.** Please revise Draft EIS text on pages 36 to 37 and page 177 to reflect BAAQMD approval procedures for prescribed bums and correct that all prescribed bums require BAAQMD approval and submittal of a bum plan.

**Response to Comment 2-3.** Draft EIS text on pages 36-37 is revised as follows in Final EIS. Note that the order of some of the text has been changed.

The bum plan is submitted to an outside expert, and both the expert and the park’s Fire Management Officer provides a recommendation to the superintendent. After the burn plan is approved by the superintendent, an application for permission to conduct a prescribed bum is made to the BAAQMD.

The bum plan estimates the percentage of the unit covered by different fuel types and of the tons of material to be burned. This information is fed into an air quality model for the bum, which is submitted as part of the application for approval submitted application to the Bay Area Air Quality Management District (BAAQMD). BAAQMD approval requires that the NPS submit a smoke management plan (SMP) and completed application materials for all prescribed bums at least 30 days prior to the proposed burn date.

With the approval of the smoke management plan, the NPS begins final planning for the prescribed bum and the project site is prepped for the burn. To prepare for a burn in grassland habitat, a line is mowed around the perimeter of the burn by cutting grasses with either a weed

whacker, mower, or tractor. In shrub or forested habitats a fire line (approximately 18 to 24 inches wide) is cut and cleared and vegetation density reduced as described above under the heading "Suppression of Unplanned Ignitions". Whenever possible, roads and trails are used as fire lines to reduce the amount of line that must be created. A hose lay is set up along the burn perimeter no more than one week prior to the burn. If the burn is being conducted in non-native tree or shrub stands (e.g., Monterey pine or Scotch broom), the non-natives may be cut down or mowed and left in the burn unit to dry before burning. This increases mortality of the targeted non-native species.

As the proposed burn day approaches, NPS staff contact BAAQMD's Meteorology and Data Analysis section which provides forecasting services to assist with tentative scheduling of prescribed burns. The MDA section will provide 96-hour, 72-hour, 48-hour and 24-hour forecasts and a 24-hour confidence level of receiving the final approval on the day of the burn itself. The NPS telephones BAAQMD between 8:30 a.m. and 1:30 p.m. on the burn day to receive final approval and an acreage burning allocation for that day. BAAQMD requires verification that the meteorological conditions fall within the range described in the SMP. On the day of the prescribed fire, The BAAQMD makes a final decision based on wind and weather as to whether it would permit the burn.

Prescribed fire personnel monitor the fire until dark or until the perimeter is secured. Personnel would stay on site overnight for burns in forested habitats. The burn area is patrolled the day after burning by walking the perimeter and doing any additional mop up activities required. As required by BAAQMD, the total acreage of burned vegetation is reported by telephone to them noon the day following the prescribed burn."

Revisions on Page 176, paragraph 4 in DEIS.

"San Francisco Bay Area Air Quality Management District (BAAQMD). BAAQMD is the air quality management district for the project area and has primary responsibility for control of air pollution from prescribed burning. BAAQMD has procedures that must be followed prior to implementation of a prescribed burn plan. For all prescribed fire, fires less than 100 acres, BAAQMD requires that burns be conducted on an "allowable burn day" unless the district has granted a variance in advance. Notice of an allowable burn day is posted by the BAAQMD each afternoon for burns planned for the following day. Following the burn, the fire agency must submit information on the fuel types burned to BAAQMD. Burns 100 acres or larger in size BAAQMD requires submission of the individual burn plan to the BAAQMD at least one month prior to the proposed burn. BAAQMD then issues a forecast 72 hours prior to the proposed date and gives a final commitment to permit the burn on the day of the burn itself though forecasts with increasing confidence can be obtained at 96-hours, 72-hours, 48-hours and 24-hours prior to the burn day to support moving forward on all the logistical planning needed to conduct a prescribed burn. 48 hours prior to the date allowing flexibility in planning needed for larger burns."

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the burn day to request an acreage burning allocation and to confirm the burn day status. The BAAQMD provides prescribed burn forecasting services to assist with the tentative scheduling on a permissive burn day. Our Meteorology and Data Analysis (MDA) section can be reached at (415) 749-4915. The MDA section can provide 96-hour, 72-hour, 48-hour, and 24-hour forecasts and a 24-hour confidence level of receiving the acreage burning allocation desired for the following day.

Comment 2-3

Prescribed burning is not allowed until an acreage burning allocation has been received by the BAAQMD. In addition, the meteorological conditions from the approved SMP must be verified prior to ignition. The BAAQMD requires that the total acreage of burned vegetation be reported back to us by noon on the following day. In addition to calling the phone number provided earlier, current burn day status can also be obtained by calling the BAAQMD Burn Status Recording line at (800) 792-0787. After 3:00 pm, the recording also provides the following day's burn forecast. A prescribed burn of any size, not just 100 acres or more, as incorrectly stated on page 177, must satisfy these requirements and follow these procedures.

Comment 2-4

We understand that part of the preferred alternative may include prescribed burning for wetland areas within the Park. Burning in wetlands is subject to marsh management fire requirements found in sections 401.13 and 410 of Regulation 5: Open Burning. Please visit our website for more details on the District's Policies and Procedures for this regulation: [http://www.baaqmd.gov/enfotherinfo/PNP/REG5\\_PNPfinal.pdf](http://www.baaqmd.gov/enfotherinfo/PNP/REG5_PNPfinal.pdf).

Comment 2-5

Table 37 on page 175 should be revised to show the Bay Area's current attainment status. The Bay Area is currently a nonattainment area for federal and state ambient air quality standards for ground level ozone and state standards for particulate matter. Earlier this month, the Bay Area was designated as a nonattainment area for the new federal 8-hour ozone standard. The air quality standards are set by the national and state governments at levels to protect public health and welfare.

Comments 2-6  
2-7  
2-8

We are concerned about the lack of detail in the DEIS concerning the National Park Service's responsibility with regards to the Clean Air Act's Regional Haze Regulation and discussion on how the preferred alternative's impacts upon regional haze can be mitigated. As a Class I airshed, Pt. Reyes is a critical natural area that the federal government has determined needs visibility improvement. In addition to the projected annual fire management emissions for all three alternatives (Tables 44, 46 and 48), please provide estimates of the number of burn days per year and the associated amount of daily emissions in tons per day. On page 174, the DEIS describes the recent findings of a cooperative program, the Interagency Monitoring of Protected Visual Environments (IMPROVE), that visibility in the park improved between 1996 and 1999. Please provide information on the monitoring site where IMPROVE data was collected, especially the site's location relative to fire activity including the appropriate fire management unit. This information will help explain the FMP's daily impact on regional haze relative to where visibility monitoring will occur to determine compliance with the upcoming federal regional haze requirements.

**Comment 2-4.** Burning in wetlands requires conformance with BAAQMD Regulation 5, Sections 40 1.13 and 410 which describe marsh management fire requirements.

**Response to Comment 2-4.** The following additional text will be inserted as a new paragraph in the Final EIS on page 298, paragraph 1, Prescribed Fire.

Burn plans that include prescribed burning in wetland areas are subject to the conformance with additional regulations when applying to BAAQMD. In addition to the SMP and other submittals, Regulation 5, Section 410, Marsh Management Burn Requirements, asks for an evaluation of non-burning alternatives that could achieve land management objectives in keeping with resource management plans that apply to the project area. Regulation 5, Section 401.13 includes more detailed guidance for planning prescribed burns that involve wetland acreage.

**Comment 2-5.** Table 37 does not reflect current attainment status.

**Response to Comment 2-5.** Table 37 is revised as requested.

Pollutant	Averaging Time	California Standards <sup>1</sup>		National Standards <sup>2</sup>	
		Concentration	Attainment Status	Concentration <sup>3</sup>	Attainment Status
	8 hour			0.08 ppm	N
Ozone (O <sup>3</sup> )	1 hour	0.09 ppm (180 µg/m <sup>3</sup> )	N	0.12 ppm (235 µg/m <sup>3</sup> )	N <sup>4</sup>

**Comment 2-6.** More detail is needed on how the preferred alternative's impacts on regional haze can be mitigated.

**Response to Comment 2-6.** Mitigation measures that address the impacts of the preferred alternative on regional haze are found on DEIS pages 56 and 57, particularly measures A-1, A-2, A-5, A-6 and A-7 and are included in the Final EIS.

**Comment 2-7.** Please provide estimates on the number of burn days per year and the associated amount of daily emissions in tons per day.

**Response to Comment 2-7.** The Point Reyes National Seashore Fire Management Officer, Roger Wong, has provided a per event breakdown of the annual estimated emissions listed in the FMP EIS.

Daily Emissions for FMP Alternatives  
(all emission levels given in tons per burn day)

Alternative	Acres treated	Burn Days per year	PM <sub>10</sub>	PM <sub>2.5</sub>	Methane	CO	NO <sub>x</sub>
<b>Alternative A</b>	500 acres	10 total burn days					
Grass scrub	495 acres	9	2.3	2.0	0.6	5.1	0.1
Understory	5 acres	1	2.9	2.4	1.4	28.3	0.8
<b>Alternative B</b>	1000 acres	20 total burn days					
Grass scrub	849 acres	15	2.5	2.0	0.6	5.1	0.1
Understory	153 acres	5	17.5	15.0	8.4	173.3	5.0

<b>Alternative C</b>	2000 acres	35 total burn days					
Grass scrub	1,724 acres	20	3.9	3.3	1.0	8.2	0.2
Understory	276 acres	15	10.5	8.9	5.0	104.2	3.0

The annual maximum acreages of prescribed burning were developed with the assumption that the program described in the alternative would be implemented with optimum funding and staffing to support this level of activity from an operational stand point. For purposes of these emission estimates, “per event” should be considered equivalent to “per day”. If, subsequent to the NEPA process, the park does not receive optimum funding for implementation of the FMP, the amount of acreage treated annually could be considerably less than proposed in the EIS. With that possibility acknowledged, the emissions presented in the EIS may overstate emissions generated as the FMP is implemented.

**Comment 2-8.** Please provide information on the monitoring site where IMPROVE data cited on page 174 was collected.

**Response to Comment 2-8.** Air quality monitoring at Point Reyes National Seashore has included particulate matter (PM2.5 and PM10), hourly ozone, and SO2 (see Table VII-3 below). The aerosol sampler in the park began operation in March of 1988. It is located at the North District Ranger Station, south of Tomales Bay State Park and north of Point Reyes Hill in the Inverness Ridge FMU. The location of the aerosol sampler is shown in Figure VII-3 excerpted from Assessment of Air Quality and Air Pollutant Impacts in Class I National Parks of California (April 2001). The status of Point Reyes air quality is Chapter VII of the full report which can be found on the NPS Air Quality website at: <http://www2.nature.nps.gov/air/Pubs/CAreview/CAreport.pdf>. The automatic 35mm camera was located on a peninsula at the south-west corner of Drakes Bay and operated from June 1987 through April 1995. The camera viewed east across Drakes Bay towards the Point Reyes Wilderness area.

Species	Site within park	Site within 50 km
Ozone, hourly	NPS**	
Ozone, passive	NPS*	
SO2	NPS	
PM10	IMPROVE	
PM2.5	IMPROVE	
Wet deposition		ARB**
Dry deposition		
Visibility		
* New site		
** Closed before 1994		

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For more information on the District's prescribed burning requirements and policies, please contact Doug Tolar, Air Quality Specialist II, in our Compliance and Enforcement Division at (415) 749-5118. If you have any questions regarding these comments, please contact Suzanne Bourguignon, Environmental Planner, at (415) 749-5093.

Sincerely,



Jack P. Broadbent  
Executive Officer/APCO

JPB:SB

cc: BAAQMP Director Harold C. Brawn, Jr.

## ***Point Reyes National Seashore and Vicinity Air and Water Monitoring Stations & Hydrography***

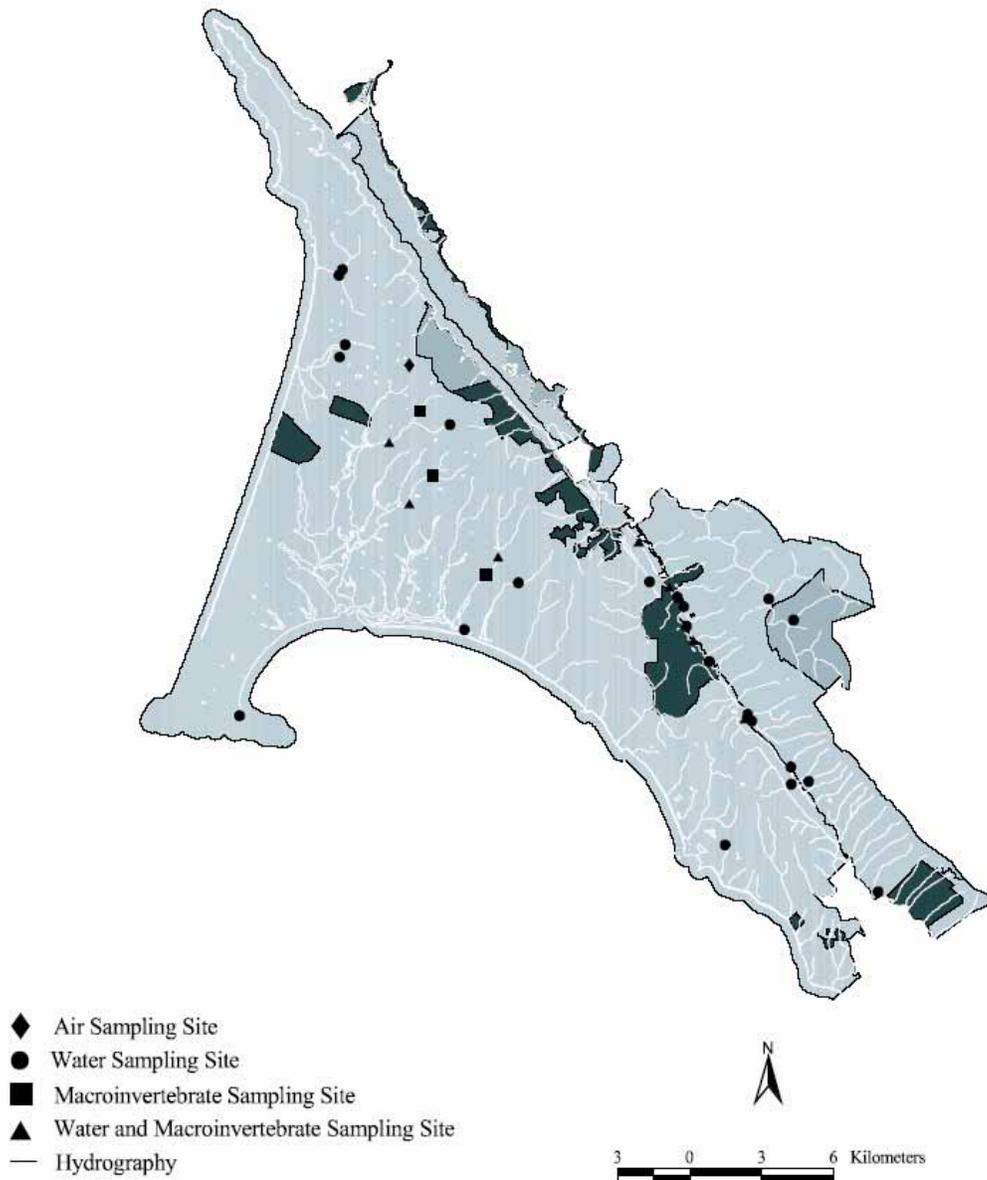


Figure VII-3. Hydrography of PORE. Also shown are the locations of air quality and water quality sampling sites monitored by the NPS.