APPENDIX E, PART 10, MINIMUM IMPACT SUPPRESSION TACTICS

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CONCEPT

The concept of Minimum Impact Suppression Tactics (MIST) is to use the minimum amount of forces necessary to effectively achieve the fire management protection objectives consistent with land and resource management objectives. It implies a greater sensitivity to the impacts of suppression tactics and their long-term effects when determining how to implement an appropriate suppression response. In some cases, MIST tactics may indicate that cold trailing or wet line would be a more appropriate approach than constructed hand line. In another example, the use of an excavator may be used rather than a dozer. Individual determinations will be dependent on the specific situation and circumstances of each fire.

MIST is not intended to represent a separate or distinct classification of firefighting tactics but rather a mind set of how to suppress a wildfire while minimizing the long-term effects of the suppression action. When the term MIST is used in the GGNRA Operational FMP it reflects the above principle.

Suppression actions on all wildfires within GGNRA will be those having a minimum impact on the physical resources associated with each site. In so doing, the principle of fighting fire aggressively but providing for safety first will not be compromised.

The key challenge to the line officer, fire manager and firefighter is to be able to select the wildfire suppression tactics that are appropriate given the fire's probable or potential behavior. The guiding principle is always least cost plus loss while meeting land and resource management objectives. It is the second part of this statement which must be recognized more than it has been in the past. Appreciation of the resources, both tangible and intangible, and the elements of the visitor experience at GGNRA, may be sometimes difficult to articulate but, nevertheless, are an important component of wildland fire management. As this recognition grows, actions must be modified to accommodate a new awareness and appreciation of them.

These actions, or MIST, may result in an increase in the amount of time spent watching, rather than disturbing, a dying fire to insure it does not rise again. They may also involve additional rehabilitation measures on the site that may not have been previously employed.

When selecting an appropriate suppression response, firefighter and public safety remain the highest concern. Fire managers must also have confidence and assurance in the selected actions to be implemented – that the actions will be effective and will remain effective for the duration of the emergency situation.

GOAL

The goal of MIST is to halt or delay fire spread in order to maintain the fire within predetermined parameters while producing the least possible impact on the resource being protected. These parameters are represented by the initial attack

incident commander's size-up of the situation in the case of a new start or by the escaped fire situation analysis (EFSA) in case of an escaped fire.

It is important to consider probable rehabilitation need as a part of selecting the appropriate suppression response. Tactics that reduce the need for rehab are preferred whenever feasible.

SUPPRESSION RESPONSIBILITY

As stated previously, safety is the highest priority. All action will be anchored to the standard fire orders and watch out situations. Safety will remain the responsibility of each person involved with the incident.

Initial/Extended Attack

<u>Incident Commander Responsibility</u> – To understand and carry out an appropriate suppression response, which will best meet the land management objectives of the area at the least cost plus loss. Insure all forces used on the fire understand the plan for suppressing the fire in conjunction with MIST.

Keep in communication with responsible fire management or line officer to insure understanding and support of tactics being used on the fire. Evaluate and provide feedback as to the tactical effectiveness during and after fire incident.

Project Fire

Type 1/ Type 2 Incident Commander Responsibility – to carry out instructions given by the responsible line officer both verbally and through the WFSA. Establish and nurture a close dialogue with the resource advisors assigned to the fire team. Review actions on site and evaluate for compliance with land line officer direction and effectiveness at meeting fire management protection objectives.

<u>Responsible Line Officer Responsibility</u> – to transmit the land management objectives of the fire area to the fire team and to define specific fire management protection objectives. Periodically review the operation for compliance.

Resource Advisor Responsibility – to insure the interpretation and implementation of WFSA and other oral or written line officer direction is adequately carried out. Provide specific direction and guidelines as needed. Participate in fire team planning sessions, review incident action plans and attend daily briefings to emphasize resource concerns and management's expectations. Provide assistance in updating WFSA when necessary. Participate in incident management team debriefing and assist in evaluation of team performance related to MIST.

IMPLEMENTATION GUIDELINES

Following is a list of considerations for each fire situation. (Text in parenthesis refers to the specific FMP Mitigation Measure (MM) referenced).

Hot-Line/Ground Fuels

- Allow fire to burn to natural barriers.
- Allow fires to back into, around, or through wetlands and meadows to avoid suppression damage. (FMP MM WET-1)
- Where wetlands are used as a natural boundary to help contain a fire, the control line will be sited outside the wetland area. Trample lines (rather than dug lines) may be used if it is necessary to site the control line in a wetland. (FMP MM WET-1)
- Wetlands will be avoided to the greatest extent possible while constructing fire lines and breaks during wildfire suppression. (FMP MM WET-1)
- Resource advisors will work through the Agency Representative to inform
 the IC to construct fire lines outside of the habitat of the San Bruno elfin or
 mission blue butterflies to the greatest extent possible. If habitat areas
 must be used, wet lines should be used if water is available, and if not,
 narrow, hand-constructed lines should be considered (FMP MM SS-24 &
 SS30).
- Use cold-trail, wet line or combination when appropriate.
- If constructed fire line is necessary, use only width and depth to check fire spread.
- Burn out and use low impact tools like swatter or 'gunny' sack.
- Minimize bucking and cutting of trees to establish fire line; build line around logs when possible.
- Use alternative mechanized equipment such as excavators, rubber tired skidders, etc. rather than tracked vehicles. Use high pressure type sprayers to clean equipment prior to assigning equipment to the incident command in order to reduce the potential to spread noxious weeds.
- Constantly re-check cold trailed fire line.

B. Hot-Line/Aerial Fuels

- Limb vegetation adjacent to fire line only as needed to prevent additional fire spread.
- During fire line construction, cut shrubs or small trees only when necessary. Make all cuts flush with the ground.

- Minimize felling of trees and snags unless they threaten the fire line or seriously endanger workers. In lieu of felling, identify hazard trees with a lookout or flagging.
- Scrape around tree bases near fire line if it is likely they will ignite.

Mop-up/Ground Fuels

- Do minimal spading; restrict spading to hot areas near fire line.
- Cold-trail charred logs near fire line; do minimal tool scarring.
- Minimize bucking of logs to extinguish fire or to check for hotspots; roll the logs instead if possible.
- Return logs to original position after checking and when ground is cool.
- Refrain from making bone yards; burned and partially burned fuels that were moved should be returned to a natural arrangement.
- Consider allowing large logs to burn out. Use a lever rather than bucking to manage large logs that have to be extinguished.
- Except in emergency situations, water drafting from park streams and creeks that support salmonids must be halted when water levels drop to a level that could result in disconnected pools of water in the channel. Any water pumping from salmonid streams will require measures to prevent injury to fish, such as using offstream sumps, restricting approach velocities to less than 0.8 foot per second, and screening at intake with openings no greater than 0.25 inch. (FMP MM SS-11)
- Use gravity socks in stream sources and/or a combination of water blivits and fold-a-tanks to minimize impacts to streams.
- Consider using infrared detection devices along perimeter to reduce risk.
- Personnel should avoid using rehabilitated fire lines as travel corridors whenever possible because of potential soil compaction and possible detrimental impacts to rehab work, i.e. water bars.

Mop-up/Aerial Fuels

- Remove or limb only those fuels which if ignited have potential to spread fire outside the fire line.
- Before felling consider allowing ignited tree/snag to burn itself out. Ensure adequate safety measures are communicated if this option is chosen.
- Identify hazard trees with a lookout or flagging.
- If burning trees/snags pose a serious threat of spreading fire brands, extinguish the fire with water or dirt whenever possible.

 Align saw cuts to minimize visual impacts from more heavily traveled corridors. Slope cut away from line of sight when possible.

LOGISTICS

Campsite Considerations

- Resource advisors will work through the Agency Representative to inform the IC to avoid, if feasible, staging fire suppression actions in or directly adjacent to the habitat of San Bruno elfin or mission blue butterflies (FMP MM SS-24 & SS-30).
- Coordinate with the Resource Advisor in choosing a site with the most reasonable qualities of resource protection and safety concerns.
- Evaluate short-term low impact camps such as coyote or spike versus use of longer-term higher impact camps.
- Use existing campsites whenever possible.
- New site locations should be on impact resistant and naturally draining areas such as rocky or sandy soils, or openings with heavy timber.
- Avoid camps in meadows, along streams or on lakeshores. Camps should be located at least 200 feet from water resources or other sensitive areas.
- Consider impacts on both present and future users. An agency commitment to resource values will promote those values to the public.
- Lay out the camp components carefully from the start. Define cooking, sleeping, latrine, and water supply.
- Minimize the number of trails and ensure adequate marking.
- Consider fabric ground cloth for protection in high use areas such as around cooking facilities.
- Use commercial portable toilet facilities where available. If these cannot be used a latrine hole should be used.
- Select latrine sites a minimum of 200 feet from water sources with natural screening.
- Do not use nails in trees.
- Constantly evaluate the impacts which will occur, both short and long term.

Personal Camp Conduct

- Use "leave no trace" camping techniques.
- Minimize disturbance to land when preparing bedding site. Do not clear vegetation or trench to create bedding sites.
- Use stoves for cooking, when possible. If a campfire is used limit to one site and keep it as small as reasonable. Build either a "pit" or "mound" type fire. Avoid use of rocks to ring fires.
- Use down and dead firewood. Use small diameter wood, which burns down more cleanly.
- Don't burn plastics or aluminum "pack it out" with other garbage.
- Keep a clean camp and store food and garbage so it is unavailable to wildlife. Ensure items such as empty food containers are clean and odor free, never bury them.
- Select travel routes between camp and fire and define clearly.
- Carry water and bathe away from lakes and streams. Personnel must not introduce soaps, shampoos or other personal grooming chemicals into waterways.

AVIATION MANAGEMENT

One of the goals is to minimize the disturbance caused by air operations during an incident.

Aviation Use Guidelines

- Maximize back haul flights as much as possible.
- Use long line remote hook in lieu of constructed helispots for delivery or retrieval of supplies and gear.
- Take precautions to insure noxious weeds are not inadvertently spread through the deployment of cargo nets and other external loads.
- Use natural openings for helispots and paracargo landing zones as far as practical. If construction is necessary, avoid high visitor use areas.
- Consider maintenance of existing helispots over creating new sites.
- Obtain specific instructions for appropriate helispot construction prior to the commencement of any ground work.
- Consider directional falling of trees and snags so they will be in a natural appearing arrangement.

- Buck and limb only what is necessary to achieve safe/practical operating space in and around the landing pad area.
- To the greatest extent possible, avoid operating aircraft below and within 500 feet of Rodeo Lagoon, Bird Island, and Bolinas Lagoon from late spring to early winter to avoid disturbance to the California brown pelican. (FMP MM SS-38)
- To avoid the spread of highly nonnative animal species (e.g., bullfrogs) and protect the habitat of federally listed threatened or endangered species, resource advisors will advise responding fire agencies of the following guidance:
 - Drawing water from freshwater bodies in GGNRA and Rodeo Lagoon should be avoided unless needed to protect life and property and there is no other feasible water source available. (FMP MM SS-4, SS-32 & SS-38)
 - Avoid drawing water from the ocean near Bird Island or Bolinas Lagoon from late spring to early winter to avoid disturbance to California brown pelicans to the greatest extent possible. (FMP MM SS-38)
 - If freshwater is drawn or scooped from water bodies in the park, it should be used on wildfires within the same watershed whenever possible. (FMP MM SS-4)
 - Ocean and bay waters are preferred water sources for fighting wildfires in the park and vicinity. (FMP MM SS-4)
 - Habitats of sensitive aquatic species, such as wetlands, and mission blue butterflies should be avoided when saltwater is used. (FMP MM SS-4)

Retardant, Foam and/or Saltwater Use

During initial attack, fire managers must weigh the non-use of retardant with the probability of initial attack crews being able to successfully control or contain a wildfire. If it is determined that use of retardant may prevent a larger, more damaging wildfire, then the manager might consider retardant use even in sensitive areas. This decision must take into account all values at risk and the consequences of larger firefighting forces' impact on the land.

- Consider impacts of water drops versus use of foam/retardant. If foam/retardant is deemed necessary, consider use of foam before retardant use.
- Determine if there restrictions on certain types of retardant.
- Foams, saltwater or other fire retardants will not be used on or near wetlands to the greatest extent possible. (FMP MM WET-2).

 Resource advisors will work through the Agency Representative to inform the IC to avoid, if feasible, using saltwater or retardant on habitat of the San Bruno elfin and mission blue butterflies. (FMP MM SS-24 & SS-30).

HAZARDOUS MATERIALS

Flammable/Combustible Liquids

- Store and dispense aircraft and equipment fuels in accordance with National Fire Protection Association (NFPA) and Health and Safety Handbook requirements.
- Avoid spilling or leakage of oil or fuel, from sources such as portable pumps, into water sources or soils.
- Store any liquid petroleum gas (propane) downhill and downwind from firecamps and away from ignition sources.

Flammable Solids

Pick up residual fusees debris from the fire line and dispose of properly.

Fire Retardant/Foaming Agents

- Do not drop retardant or other suppressants near surface waters.
- Use caution when operating pumps or engines with foaming agents to avoid contamination of water sources.

FIRE REHABILITATION

Rehabilitation is a critical need. This need arises primarily because of the impacts associated with fire suppression and the logistics that support it. The process of constructing control lines, transport of personnel and materials, providing food and shelter for personnel, and other suppression activities has a significant impact on sensitive resources regardless of the mitigating measures used. Therefore, rehabilitation must be undertaken in a timely, professional manner.

During implementation, the resource advisor should be available for expert advice and support of personnel doing this work as well as quality control.

Rehabilitation Guidelines

- Pick up and remove all flagging, garbage, litter, and equipment. Dispose of trash appropriately.
- Clean fire pit of unburned materials and fill back in.

- Discourage use of newly established trails created during the suppression effort by covering with brush, limbs, small diameter poles, and rotten logs in a naturally appearing arrangement.
- Replace dug-out soil and/or duff and obliterate any berms created during the suppression effort.
- Resource Advisors will work through the Agency Representatives on advising the preferred techniques to use to prevent soil erosion and sedimentation of drainages. The standard for waterbar placement is presented below. Waterbar construction must be approved by the Park Resource Advisor prior to any construction as waterbars may not be the environmentally preferred solution to control erosion.

| Trail Percent Grade | Maximum Spacing Ft. |
|---------------------|---------------------|
| 6-9 | 400 |
| 10-15 | 200 |
| 15-25 | 100 |
| 25+ | 50 |

- Where soil has been exposed and compacted, such as in camps, on user-trails, at helispots and pump sites, scarify the top 2-4 inches and scatter with needles, twigs, rocks, and dead branches. Seed from sources other than the park will not be appropriate to use on barren areas, in order to maintain the genetic integrity of the area. It may be possible, depending on the time of year and/or possibility of a rainy period, to harvest and scatter nearby seed, or to transplant certain native vegetation.
- Blend campsites with natural surroundings, by filling in and covering latrine with soil, rocks, and other natural material. Naturalize campfire area by scattering ashes in nearby brush (after making sure any sparks are out) and returning site to a natural appearance.
- Where trees were cut or limbed, cut stumps flush with ground, scatter limbs and boles, out of sight in unburned area. Camouflage stumps and tree boles using rocks, dead woody material, fragments of stumps, bolewood, limbs, soil and fallen or broken green branches. Scattered sawdust and shavings will assist in decomposition and be less noticeable. Use native materials from adjacent, unimpacted areas if necessary.

- Remove newly cut tree boles that are visible from trails or meadows. Drag
 other highly visible woody debris created during the suppression effort into
 timbered areas and disburse. Tree boles that are too large to move
 should be slant cut so a minimal amount of the cut surface is exposed to
 view. Chopping up the surface with an axe or pulaski, to make it jagged
 and rough, will speed natural decomposition.
- Leave tops of felled trees attached. This will appear more natural than scattering the debris.
- Consider -- if no other alternatives are available -- helicopter sling loading rounds and tops from a disturbed site when there has been an excessive amount of bucking, limbing and topping.
- Tear out sumps or dams, where they have been used, and return site to natural condition. Replace any displaced rocks or streambed material that has been moved. Reclaim streambed to its predistrubed state, when appropriate.
- Walk through adjacent undisturbed area and take a look at your rehab efforts to determine your success at returning the area to as natural a state as possible. Good examples should be documented and shared with others!

DEMOBILIZATION

Because demob is often a time when people are tired or when weather conditions are less than ideal, enough time must be allowed to do a good job. When moving people and equipment, choose the most efficient and least impactive method to both the landscape and fire organization mission. An onthe-ground analysis of "How Things Went" will be important.

POST-FIRE EVALUATION

Post-fire evaluation is important for any fire occurrence so management can find out how things went. Identify areas needing improvement, to formulate strategies and to produce quality work in the future. This activity is especially important in sensitive areas due to their fragility and inclination to long-term damage by human impacts.

Resource advisors and functional specialists such as park ecologists, hydrologists, fire management staff and rangers will be responsible for conducting the post-fire evaluation. They are the people who have the experience and knowledge to provide information required to make the evaluation meaningful and productive.

Post-fire evaluation by Burn Area Response Team (BAER) will begin during the suppression effort. An emergency stabilization plan will be completed within 7 days of the date of fire containment per 620 DM 3.

DATA COLLECTION/DOCUMENTATION/RECOMMENDATIONS

This phase will be completed by a review of the rehab plan and visit to the fire site as soon after demobilization as possible. An inventory of comps and helispots will be completed. This will also include an objective overview of other areas covered by the rehab plan.

Observations will be documented in a brief report to the line officer with a copy to the appropriate incident commander. In the report, the evaluator will include recommendations for ensuing fire suppression activities on similar lands. It is important that the evaluator recognize and commend the initial attack forces or overhead team for positive activities. Make special note of the extra efforts and sensitivity to suppression impacts.

STANDARD FIRE ORDERS

FIRE BEHAVIOR

- 1. Keep informed on the fire weather conditions and forecasts.
- 2. Know what your fire is doing at all times.
- 3. Base all actions on current and expected behavior of the fire.

FIRELINE SAFETY

- 4. Determine escape routes and safety zones and make them known.
- 5. Post lookouts where there is possible danger.
- 6. Be alert. Be calm. Think clearly. Act decisively.

ORGANIZATIONAL CONTROL

- 7. Maintain prompt communications with your forces, your boss and adjoining forces.
- 8. Give clear instructions and be sure they are understood.
- 9. Maintain control of your forces at all times.

IF YOU CONSIDER 1 – 9, THEN

10. Fight fire aggressively, having provided for safety first.

WATCH OUT SITUATIONS

- 1. Fire not scouted and sized up.
- 2. In country not seen in daylight.
- 3. Safety zones and escape routes not identified.
- 4. Unfamiliar with weather and local factors influencing fire behavior.
- 5. Uninformed on strategy, tactics and hazards.
- 6. Instructions and assignments not clear.
- 7. No communication link with crew members/supervisor.
- 8. Constructing fire line without safe anchor point.
- 9. Building fire line downhill with fire below.
- 10. Attempting frontal assault on fire.
- 11. Unburned fuel between you and the fire.
- 12. Cannot see main fire, not in contact with anyone who can.
- 13. On a hillside where rolling material can ignite fuel below.
- 14. Weather is getting hotter and drier.
- 15. Wind increases and/or changes direction.
- 16. Getting frequent spot fires across line.
- 17. Terrain and fuels make escape to safety zone difficult.
- 18. Taking a nap near the fireline.