

Compendium of DOE Wildland Fire Management Memoranda

This document contains 3 memoranda:

1. June 5, 2000 memorandum from former Deputy Secretary T.J. Glauthier implementing a moratorium on prescribed fires at DOE sites
2. May 5, 2001 memorandum from Secretary Spencer Abraham providing Fire Management Program Direction
3. April 8, 2002 memorandum from Assistant Secretary for Environment, Safety and Health Beverly A. Cook reminding DOE offices of the May 11, 2001 Fire Management Program Direction memorandum's points and further guidance on wildland fire management



The Deputy Secretary of Energy
Washington, DC 20585

June 5, 2000

MEMORANDUM FOR: ACTING DEPUTY ADMINISTRATOR FOR
DEFENSE PROGRAMS
ASSISTANT SECRETARY FOR
ENVIRONMENTAL MANAGEMENT
ASSISTANT SECRETARY FOR FOSSIL ENERGY
ASSISTANT SECRETARY FOR ENERGY
EFFICIENCY AND RENEWABLE ENERGY
GENERAL COUNSEL
DIRECTOR, OFFICE OF SCIENCE
DIRECTOR, OFFICE OF NUCLEAR ENERGY,
SCIENCE, AND TECHNOLOGY
OPERATIONS OFFICE MANAGERS
FIELD OFFICE MANAGERS

FROM:  T. J. GLAUTHIER

SUBJECT: MORATORIUM ON PRESCRIBED FIRES

As you know, we suspended all Department of Energy (DOE) prescribed fire (i.e., "controlled burn") actions due to the recent wildfire that swept through Los Alamos. We are now extending the DOE moratorium until an ongoing review of policies and practices led by the Office of Environment, Safety and Health is completed. This moratorium is effective immediately and will remain in effect pending further notification.

It is understood that a number of DOE sites maintain their own protocols for prescribed burns and that several are planned in the coming months. The Office of Environment, Safety and Health will be working with the existing Department of Energy Fire Safety Committee consisting of program and field representatives in order to review these existing policies, processes and criteria and to develop, as necessary, Department-wide policy and guidance. The Department will also be looking to the ongoing federal interagency effort examining the policies of other agencies and lessons learned from the Los Alamos fire for guidance.

If a prescribed fire is still considered essential during this time, a waiver from this moratorium must be requested from me. Such a request will be reviewed by the

Office of Environment, Safety and Health who will recommend whether a waiver should be granted.

Further details on this policy review will be forthcoming as it proceeds; in the interim, additional background information is attached. Questions regarding this moratorium can be directed to Steve Cary, Office of Environment, Safety and Health, at 202-586-4693.

Attachment

PREScribed BURNS - PATH FORWARD

- Currently, there are no Department of Energy (DOE)-wide policies or guidelines regarding the conduct of prescribed burns as a tool in forest management and fire protection. Individual sites maintain their own protocols in this regard.
- As a result of the Cerro Grande fire at Los Alamos, the Department has decided to impose a moratorium on such prescribed burns pending a review of its existing policies, processes and criteria for such fires at DOE sites and to develop, as necessary, DOE-wide policy and guidelines.
- This effort will be coordinated with the Department of the Interior (DOI), the Forest Service, and other appropriate agencies as they review the lessons learned from the Los Alamos fire. It is anticipated that DOE will follow their lead in terms of revisiting existing prescribed burn policies while examining those implications and needs unique to DOE (e.g., security and environmental radiological contamination).

The following activities will be completed during this review:

- DOE's standing Fire Safety Committee (chaired by the Office of Environment, Safety and Health (ESH)) is reviewing existing prescribed fire policies and criteria provided by DOE field offices to determine sufficiency for ensuring facility and life safety, ecosystem management, or resource preservation.
- DOE Fire Safety Committee will coordinate its review of existing policies and criteria with DOE Program and Field Offices, National Fire Protection Association, and appropriate federal, state, and tribal agencies.
- ESH will coordinate with the interagency team on Los Alamos lessons learned and any resulting revised DOI prescribed burn policies and criteria.
- ESH will coordinate with DOE Fire Safety Committee, Program and Field Offices to develop a DOE policy and guidelines for prescribed burns, as necessary.

From the standpoint of policy and guidelines development, ESH will begin interactions with DOI and other agencies by June 15, will compile its survey of existing site policies and Los Alamos lessons learned by August 1, and will convene an internal DOE policy review committee by the same date. It is expected that a draft policy and guidelines will be proposed for internal review by October 1, 2000, with Secretarial issuance by December 1, 2000 (i.e., within 6 months). The latter milestone is scheduled to accommodate whatever policy or guidance is forthcoming from the ongoing interagency deliberations.



The Secretary of Energy
Washington, DC 20585

May 11, 2001

MEMORANDUM FOR SECRETARIAL OFFICERS
AND FIELD OFFICE MANAGERS

FROM: SPENCER ABRAHAM 

SUBJECT: Fire Management Program Direction

Following the Cerro Grande fire in New Mexico, the Deputy Secretary of Energy issued a memorandum on June 5, 2000, "Moratorium on Prescribed Fires," suspending all Department of Energy (DOE) prescribed fires. The purpose of this memorandum is to inform you that the prescribed fire moratorium is still in force and will remain so until such time as the Department's wildland and fire management policy and implementing guidance are issued. DOE recognizes that certain sites have to address wildland fires, prescribed fires and other fires during the upcoming fire season. In the interim and effective immediately, authority for approving a prescribed fire waiver request to the moratorium shall reside with Field Office Managers or their direct report in charge of a specific site.

To support the development of a DOE-wide wildland and fire management policy and implementing guidance, the office of Environment, Safety and Health (EH), in coordination with the DOE Fire Safety Committee, has been reviewing relevant documents, including the 2001 Federal Wildland Fire Management Policy, Wildland and Prescribed Fire Management Policy Implementation and Procedures Reference Guide, Initial Joint Review of Wildland Fire Safety at DOE sites, Comprehensive Fire Safety Review, and lessons learned from the Cerro Grande fire. Field sites have also provided responses to the Wildland and Prescribed Fire Questionnaire developed by EH, the results of which have supported the development of baseline information pertaining to existing fire policies, procedures and practices across the DOE complex. These data were helpful in the development of this Program Direction memorandum and will assist us as we develop the Department's wildland and fire management policy and implementing guidance.

"Prescribed fires/controlled burns" are planned management actions for fuels reduction and for ecosystem management. They are considered part of a site's land and resource management planning and are generally included in a site's wildland fire management planning documents. This contrasts with "operational fires," which are defined as planned management actions to safely and cost effectively remove debris from operational or construction activities. They are conducted in cleared or designated areas. Operational fires are more limited in complexity and duration than prescribed fires. They include, for example, fires in incinerators or open pits; or fires to burn debris from land clearing/grubbing for structures, mining activities, timber harvesting, power line or pipeline construction, and road construction.



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DOE Field Office Managers, or their direct report in charge of a specific site, may grant waivers for prescribed fires based on a documented review of relevant criteria set forth in the attachment to this memorandum. These criteria shall be considered and addressed, as appropriate, in each site's DOE approved wildland fire management planning documents. Site fire management planning documents shall address the full range of fires, including planning for and response to wildfires, prescribed fires, and operational fires. Site fire management planning documents shall also include procedures for the notification of the DOE Headquarters Emergency Operations Center and Lead Program Secretarial Officer as appropriate. The fire management planning documents discussed above refer to existing plans currently in place at sites that routinely conduct prescribed and operational fires. The appropriate managers (e.g., Nuclear Safety, Radiological Control Manager and Fire Protection Manager) should concur, as appropriate, with fire management planning documents prior to Field Office Manager approval of waiver requests. Operational fires conducted at DOE sites are not considered prescribed fires and therefore are not subject to the moratorium. However, operational fires shall be approved by DOE Field Office Managers, or their designee, based on plans that document the consideration of relevant criteria, using a graded approach.

Attachment: FIELD MANAGER CHECKLIST FOR APPROVING INDIVIDUAL
PRESCRIBED AND OPERATIONAL FIRES

FIELD MANAGER CHECKLIST FOR APPROVING INDIVIDUAL PRESCRIBED AND OPERATIONAL FIRES

The decision to proceed with a planned fire, both prescribed and operational fires, is based on many site-specific factors and complexities that influence the determination. Fire management planning documents, specific waivers to the moratorium on prescribed fires and requests for approval of operational fires submitted to DOE Field Office Managers, or their direct report in charge of a specific site, for approval shall consider and address, in a documented review, the relevant criteria set forth below. A burn plan shall be developed and locally approved by DOE Field Office Managers, or their designee, to address the objectives and potential impacts of a fire. A planned fire always has a risk. Burn plans shall assess the factors that can adversely impact a planned fire and carefully and rationally address needed controls to prevent or mitigate the hazards. Burn plans shall be developed using the integrated safety management system approach and be fully consistent with existing land and resource management plans. Coordination and planning with other federal, State and local agencies and organizations is essential for fire management planning and response. Burn plans shall also include procedures for the notification of the DOE Headquarters Emergency Operations Center and Lead Program Secretarial Officer as appropriate. The U. S. Forest Service Manual on Fire Management (Title 5100) is a good reference for models and tools for making "go/no-go" decisions for planned fires.

In approving individual prescribed burns and operational fires, Field Office Managers, or their direct report in charge of a specific site, shall consider as appropriate the following:

NEED

1. Have alternatives to the proposed fire been considered?
2. What is the justification for this proposed fire?
3. What are the objectives of this fire?
4. Are there any controversial site property, personnel, firefighter or public issues that may affect decisions or plans regarding this fire?

SITE BACKGROUND

5. Location of proposed fire?
6. Description of area?
7. Time frame and schedule of proposed fire?

ADMINISTRATIVE AND MANAGEMENT

8. Who will conduct the fire?
9. Are clear lines of authority established?
10. Are individual responsibilities clearly identified for all aspects of the fire?
11. Is proposed fire consistent with the site's fire management plan?
12. Have all necessary approvals and permits been obtained?
13. Is hazard information readily available to emergency responders upon dispatch to the area?
14. What personnel and organizations (on and off site) will be notified prior to the fire?
15. Are there adequate fire response personnel available onsite?
16. Are emergency response contingency plans in place in the event the fire escapes its controls?
17. Have arrangements been made with offsite emergency response organizations in the event their assistance is needed?
18. Has the plan for the proposed fire been reviewed by a qualified fire safety, forest management and emergency services (fire department) subject matter expert?

MONITORING, ANALYSIS AND TECHNICAL ISSUES

19. Have all relevant hazards been assessed and addressed, including:
 - weather conditions (forecasted wind, heat, precipitation, etc.), including establishment of bounding weather conditions
 - fire conditions (combustibility of materials and undergrowth, etc.)
 - ignition options (torch, fuel oil, etc.)
 - terrain slope and conditions
 - accessibility of personnel or equipment to fire area
 - nearby hazardous or combustible materials
 - radiological contamination
 - nearby facilities, including defensible space around facilities in accordance with NFPA Code 299
 - proper personnel protective equipment
20. Have all controls been addressed, including:
 - fire watch
 - monitoring equipment
 - firefighting/suppression equipment and supplies
 - qualified fire/burn technicians and other trained personnel

21. Has a fuels assessment been conducted to determine vulnerability of a wildfire?
22. Does the plan for the proposed fire address impacts to the environment from potential firefighting efforts?
23. Have the potential impacts of the proposed fire on the following been considered and addressed:
 - habitat (wildlife, fish, plants)
 - watersheds
 - endangered species
 - air quality (including prevention of significant deterioration air quality impacts that might be required by State regulations)
 - soil erosion
 - other ecosystems
 - cultural resource areas
 - hazardous or radioactive waste storage or burial areas that may be vulnerable to this fire event
24. Does the proposed fire comply with applicable Federal clean air or State General Conformity regulations that apply to federal agencies, if the fire will occur in a nonattainment or maintenance area?
25. Are safeguards identified in the fire management plan to protect storage/burial areas and the environment from fire or an environmental release that could result from this fire event?
26. Is there a contamination profile of the site available that identifies the possible contaminants and their actual or potential concentrations and location?
27. Does the site's environmental surveillance program allow monitoring of the environment during and after a fire event for releases of radioactive and hazardous substances?
28. Has the need for ecosystem restoration after the fire event been assessed and planned?
29. Has safety of site personnel and property, firefighters or the public been considered and addressed?

**Department of Energy**

Washington, DC 20585

April 8, 2002

MEMORANDUM FOR PROGRAM SECRETARIAL OFFICERS

FROM

Beverly A. Cook *Beverly A Cook*
Assistant Secretary
Environment, Safety and Health

SUBJECT

Prescribed Fires

The prescribed fire season is rapidly approaching. The purpose of this memorandum is to remind you that Secretary Abraham's May 11, 2001, memorandum (attached) authorized Field Office Managers to grant waivers to the ongoing moratorium on prescribed fires based on a review of criteria that is attached to his memorandum. No Program Secretarial Officer (PSO) or Office of Environment, Safety and Health (EH) concurrences are needed for the waivers. However, PSOs that need to be informed of approved prescribed fire waivers before hand should issue their own guidance to their Field Office Managers requiring such notification.

Further DOE policy and guidance on wildland fire management is contemplated to be developed in DOE O 450.1, *Environmental Management Program*, and its associated manual. This Order is under development and will replace DOE O 5400.1.

Attachment