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Chapter 18 Fuels Management/Prescribed Fire

Introduction

The Fuels Management Programs within the Department of the Interior (DOI) and the Forest Service have the purpose of reducing risks to human communities and improving the health of the land. To ensure these programs are coordinated, common priorities for fuel treatments have been established which follow these guidelines.

- Compliment federal land stewardship responsibilities by providing a fuels treatment program that can be realistically implemented.
- Represent a collaborative, efficient, and effective program necessary to reduce the wildland fire risk to both communities and the environment.
- Expand fuels treatment program capabilities and biomass utilization markets.

The DOI and USDA-FS along with other federal, state, tribal, and local partners will work collaboratively to ensure effective fuels treatment efforts are planned and implemented. These efforts will be consistent with the direction provided in:

- *“Restoring Fire -Adapted Ecosystems on Federal Lands- A Cohesive Strategy”* (Federal Cohesive Strategy)
- Western Governors Association *“A Collaborative Approach for Reducing Wildland Fire Risks to Communities and the Environment- 10 Year Comprehensive Strategy”* (10 Year Comprehensive Strategy)

The following chapter outlines the similarities in fuels management between the DOI agencies and the USDA Forest Service. However, there exist some programmatic differences that are identified in the following agency specific documentation and serve as agency specific direction.

- **BLM-** Refer to (IM No. OF&A 2004-003) for specific agency direction.
- **FWS-** Refer to Fire Management Handbook for specific agency direction.
- **NPS-** Refer to RM 18 for specific agency direction.
- **FS-** Refer to FSM 5140 and The Wildland and Prescribed Fire Management Policy-Implementation Procedures Reference Guide for specific agency direction.

This agency specific direction will be referenced throughout this chapter as “Refer to agency specific direction.” Any different specific direction reference will be noted.

Policy

The safety of firefighters and the public is the number one priority when planning and implementing fuels treatment projects.

1 All prescribed fire projects will have an approved prescribed fire plan prior to
2 ignition.

3

4 All prescribed fire plans will contain measurable objectives, a predetermined
5 prescription, and an escaped fire plan to be implemented in the event of an
6 escape.

7

8 All prescribed fire plans will contain the required elements as outlined in the
9 agency policy.

10

11 All fuels treatment projects will be in compliance with NEPA requirements.

12

13 All fuels management projects will be tracked and progress will be reported
14 within required timeframes. Impediments to the completion of the projects will
15 be identified and actions will be taken to mitigate the impediment.

16

17 All fuels treatment projects will be monitored to determine if treatment
18 objectives were met and evaluation reports completed and maintained in the
19 project file. All fuels treatment projects will support resource management
20 objectives as identified in the Land Use Plans. Refer to agency specific
21 direction.

22

23 **Priorities**

24 The agencies will strategically focus fuels treatment activities as identified in the
25 Fire Management Plan by placing priority on:

26 • **Wildland Urban Interface (WUI) Areas** - These areas currently have two
27 accepted definitions:

28

➤ “The urban Wildland interface community exists where humans and
29 their development meet or intermix with wildland fuel.” This
30 definition is found in the *Federal Register*/Vol. 66, No. 3/Thursday,
31 January 4, 2001/Notices; and *A Fire in the West, The Wildland/Urban
32 Interface Fire Problem A Report for the Western States Fire
33 Managers*, September 18, 2000.

34

➤ “The line, area, or zone where structures and other human
35 development meet or intermingle with undeveloped wildland or
36 vegetative fuel.” This definition is found in the NWCG Glossary and
37 the *10-Year Comprehensive Strategy Implementation Plan*.

38

39 • **WUI fuel reduction projects**

40 WUI fuel reduction projects mitigate the risks to people, their
41 communities, and adjacent resource values important to the social/
42 economic stability of those communities from unwanted wildland fire.
43 The National Interagency Fuels Coordination Group has defined valid
44 WUI fuel treatment projects as those projects that meet the following
45 criteria:

- 1 ➤ They must focus on communities at risk that are published in the
2 *Federal Register* or are identified as future communities by local
3 collaborative efforts.
- 4 ➤ They must be adjacent or in close proximity to federal lands where
5 there is a risk of fire originating on federal lands and threatening life
6 and community property.
- 7 ➤ They must have a completed fire risk assessment and mitigation
8 strategy, or be in the process of developing one, through collaborative
9 efforts with interagency partners.
- 10 ➤ They must implement the fire mitigation strategy.
- 11 • **Natural Resource Areas**
12 Natural Resource Areas where actions will improve the resiliency and
13 sustainability of wildland ecosystems to benefit and maintain: water
14 quality, air quality, wildlife and fisheries habitat, and threatened,
15 endangered, or other special status plant and animal species or habitat.
- 16 • **Areas where actions will reduce risks and damage from a wildfire.**
17 Areas where actions will reduce risks and damage from a wildfire. This
18 includes the reintroduction of fire into fire dependant ecosystems to
19 maintain and enhance those ecosystems and the modification of vegetation
20 to achieve specific land management objectives.

22 **Project Planning, Selection, and Tracking**

24 **Planning**

25 Hazardous Fuels Treatment activities are a coordinated interdisciplinary effort
26 supported by Resource and Fire Management. All participating disciplines will
27 coordinate their respective roles for the planning, implementation, monitoring,
28 and evaluation, reporting, and funding of fuels treatment projects. Resource
29 Management is responsible for managing vegetation and soils. Fire
30 Management is responsible for identifying hazardous fuel situations and
31 managing mitigation activities.

32
33 All use of fuels treatments and prescribed fire will support land and resource
34 management plans. The agency specific land management plans serve as the
35 document to initiate, analyze, and provide the basis for conducting fuels
36 treatment activities and using prescribed fire to meet resource objectives.

37
38 The Fire Management Plan (FMP) serves as the program strategy document for
39 fuels treatments and prescribed fire activities. The FMP captures and quantifies
40 the overall fuels management program needs of the field office. The FMP
41 identifies how fuels treatments and prescribed fire, along with other fire
42 management strategies, will be used to meet the overall land management goals
43 identified in land use plans.

1 Compliance with the National Environmental Policy Act (NEPA) is required for
 2 all fuels treatment projects. As per Public Law 95-95, compliance with federal,
 3 state, and local air quality regulations is mandatory and will require coordination
 4 with state and local air quality authorities. Personnel developing Fuels
 5 Treatment and Prescribed Fire Plans must be aware of state and local regulations
 6 and the impacts that a specific project may have on critical areas. Prescribed
 7 Fire and Fuels Treatment Plans need to identify sensitive areas and provide
 8 operational guidance to mitigate potential impacts from smoke or other
 9 particulates. Follow appropriate state and local requirements regarding smoke
 10 dispersion modeling.

11

12 **Fuel Treatment Selection Process**

13 The following table illustrates the process steps, responsible organizational
 14 levels, and associated timeframes involved in the fuel treatment program
 15 development and collaboration process agreed to by the Forest Service and DOI
 16 agencies. This process does not circumvent any agency specific budget
 17 processes, which are documented in other memoranda particular to each agency.
 18 All agencies have synchronized the critical steps and agree on the criteria to be
 19 used in program development.

20

21 Refer to agency specific direction and (Interdepartmental Memo dated March
 22 20, 2002 titled Fuels Treatment Development and Collaboration Process)

23

DOI/FS Fuels Treatment Selection Process		
Process Steps	Responsibility	Timeframe (Due Date)
DOI Agencies and Forest Service regional allocations of hazardous fuel reduction funds are determined annually at the national level. Distributions are based on criteria from the Federal Cohesive Strategy and include but may not be limited to: <ul style="list-style-type: none"> • Fire management workload; • Departure from historical fuel conditions and fire occurrence; • Risk to communities (for wildland/urban interface projects); • Risk to ecosystems; • Benefits that extend beyond treatment areas; • Potential for unwanted wildland fire to cause 	Department of the Interior/Office of Wildland Fire Coordination (OWFC) staff, Forest Service Fire and Aviation Management staff, bureau offices in consultation with National Office level - Bureau Directors, FS and DOI Fuel Treatment Coordinators, FS and DOI Budget Coordinators	During the next and all future fiscal year budget development cycles

DOI/FS Fuels Treatment Selection Process		
Process Steps	Responsibility	Timeframe (Due Date)
irreversible damage to communities; ecosystems, or historical / cultural resources; <ul style="list-style-type: none"> • Projects that span multiple agency and ownership boundaries with broad interagency as well as non-governmental organizations and community participation; • Multi-year projects based on current land use and fire management plans, collaboration with federal, state, and tribal interagency partners, and • Prior performance in the hazardous fuels program. 		
Adjusts database to reflect current fiscal year allocation and program emphasis.	States/ Regional Offices/	4/1 current year
Field units develop out year fuels program estimates.	Regional Offices/National Forests	5/1 each year
Forest Service and DOI bureaus will develop and maintain a list of fuels treatment cooperators/partners that have engaged in the project selection process in each state. List will be submitted to the DOI OWFC and FS Fire & Aviation Management.	FS and DOI Fuel Treatment Coordinators with support from Regional/State Fuels Coordinators	5/15 each year
DOI bureaus will indicate approximate number of acres of fuels to be treated in the budget out-year (current FY +2 years) for use in developing departmental budget guidance and budget justifications (e.g. 5/30/03 provide # acres to be treated FY05).	Bureau Directors/DOI Fuel Treatment Coordinators submit to OWFC	5/30 each year

DOI/FS Fuels Treatment Selection Process		
Process Steps	Responsibility	Timeframe (Due Date)
Forest Service and DOI bureau field units and tribes, in collaboration with local level partners, enter new single-year and new or continuing multi-year fuel treatment projects in NFPORS. The list of projects represents potential treatments for the next fiscal year based on the President's Budget, has been prioritized locally, and will be submitted to Regional/State offices. Priority considerations for local project development and prioritization will be based on the Federal Cohesive Strategy and local issues (refer to priority criteria in Federal Cohesive Strategy).	Local Level cooperators	7/1/current year
Forest Service and DOI Regional/State Offices, in consultation with states, tribes, and local partners, prioritize projects, consolidate lists, and submit consolidated package for their area of responsibility to national offices. Priority considerations for project development and prioritization will be based on the Federal Cohesive Strategy (refer to priority criteria in Federal Cohesive Strategy).	Regional/State Offices, cooperators	8/1/current year
DOI Bureau Directors submit proposed new project list to Department of the Interior; Forest Service National Office compiles project list for next fiscal year. This proposed project list serves as the initial DOI and Forest Service input to Budget Year Action and Financial Plan.	National Offices – Bureau Directors, Forest Service Chief	9/1/current year

DOI/FS Fuels Treatment Selection Process		
Process Steps	Responsibility	Timeframe (Due Date)
DOI National Offices utilize Federal Cohesive Strategy priorities for distributing wildland-urban interface and hazardous fuel treatment funds and establish Bureau regional/state budget caps, dependent upon budget approval and/or Department direction for implementation. Priority considerations for project development and prioritization will be based on the Federal Cohesive Strategy (refer to priority criteria in Federal Cohesive Strategy).	Bureau Directors, National Offices – Fuel Treatment Coordinators	Completed after budget approved.
DOI Bureaus make preliminary budget allocations to the Regions and States.	National Office – Bureau Directors	9/8 current year based on Congressional action to date. Subject to change upon final Congressional appropriations.
DOI Bureau Regional/State offices make fund allocation decisions for new fiscal year projects within their defined budget caps.	Regional/State Offices	9/15/current fiscal year based on Congressional action to date. Subject to change upon final Congressional appropriations.

DOI/FS Fuels Treatment Selection Process		
Process Steps	Responsibility	Timeframe (Due Date)
Forest Service and DOI Bureaus issue official budget allocations to regions and states.	National Offices – Bureau Directors, Forest Service Chief	For DOI Bureaus - upon apportionment of appropriation by the OMB. FS and DOI budget offices will give budget policy guidance upon completion of Congressional appropriation. Forest Service – Hazardous fuels budget allocations are transmitted as part of total FS budget program direction.
DOI administrative units/local groups get new funding allocations and Performance Measure Targets.	Local Level cooperators	Upon apportionment of appropriation by OMB.
Initiate priority project implementation.	Local level cooperators	10/1 new fiscal year.
Administrative units adjust planned program in NFPORS to reflect budget allocation.	Local/State/Regional	30 days after notification from National Office.
National offices compile final Funded Project List (provide as final input to current fiscal year Action and Financial Plans).	National Office – Bureau Directors, Fuel Treatment Coordinators	Upon apportionment of appropriation by OMB. Transmitted 30 days after final budget.

DOI/FS Fuels Treatment Selection Process		
Process Steps	Responsibility	Timeframe (Due Date)
DOI Bureaus develop complete list of carryover projects that could not be implemented from previous fiscal year.	Local level cooperators, Regional/State Offices, National Offices – Bureau Directors, Fuel Treatment Coordinators	10/15
Forest Service and DOI compile previous fiscal year accomplishments (input to End of Year Report).	Regional/State Offices, National Offices	11/1 current year
<p>If DOI projects cannot be implemented, the local level with cooperators will recommend a substitute project or carrying the existing project until a later date. If funds need to be shifted (within units, between units, between regions, or between bureaus), the Regional/State Offices will be notified and decisions will be made by Bureau Directors at the National level.</p> <p>If FS projects cannot be implemented, changes will made at field level, and database adjusted.</p>	<p>Input and communication from all levels. Decisions regarding fund re-distribution or movement made by Bureau Directors.</p> <p>FS local level</p>	Ongoing
DOI local administrative units, tribes, and other cooperators track project status and report to Regional/State Offices on status monthly.	Local Level cooperators	Ongoing – monthly reports
DOI Regional/State offices monitor accomplishment milestones and support increased implementation when needed, identify need for fund transfers when needed, and keep national offices informed of projects status.	Regional/State Offices	Ongoing – monthly
Units ensure that data in NFPORS is current.	Local/State/Regional	Ongoing - monthly

1 **Tracking and Reporting**

2 Accountability (for monies spent and results achieved) is expected and closely
3 monitored from within and outside the departments. The Wildland Fire
4 Leadership Council has established NFPORS as the required interagency system
5 to assist field, state, regional, and national personnel in managing and reporting
6 accomplishments for work conducted under the National Fire Plan.

7
8 **National Fire Plan Operations and Reporting System (NFPORS)**

9 The Hazardous Fuels module of the system has been developed and is the
10 national interagency standard for:

- 11 • Submitting proposed projects for funding,
- 12 • Tracking and managing the program,
- 13 • Reporting performance, measuring accomplishments and accountability.

14
15 The following business rules will be used in reporting accomplishments:

16 • **Wildland Fire Use**

17 Acres burned in a wildland fire may only be reported as a fire use
18 treatment if the unit has an approved Fire Management Plan allowing
19 Wildland Fire Use, and the fire was managed as a Wildland Fire Use
20 incident with an approved Wildland Fire Implementation Plan (WFIP).
21 Limited suppression or confinement fire acres may not be counted as fire
22 use accomplishments.

23 • **Planned Treatments Burned in a Wildfire**

24 Acres burned in a wildfire may only be reported in NFPORS as prescribed
25 fire if all the following conditions are met:

- 26 ➤ The area burned was in a pre-existing NFPORS treatment unit.
- 27 ➤ The formal planning (NEPA, Burn Plan, etc.) had already begun to
28 treat the unit.
- 29 ➤ The planned resource objectives were met.
- 30 ➤ The claim is approved by a Regional Fuels Specialist.

31
32 **Fuels Management Performance Measures**

33 The fuels management targets and accomplishments to be tracked are defined
34 as:

- 35 • Total number of acres treated both in the WUI and Hazardous Fuels all
36 condition classes.
- 37 • Total number of acres treated in the WUI.
- 38 • Total number of acres treated in condition classes 2 or 3 in fire regimes
39 1,2,3 outside the WUI.
- 40 • Total number of acres treated /total cost.
- 41 • Total number of RX fires conducted that result in violations/total # of RX
42 fire treatments.
- 43 • Total number of acres treated in condition class 2 moved to condition class
44 1.

- 1 • Total number of acres treated in condition class 3 moved to condition class
2 1 or 2.
- 3 • Total number of acres moved to a better condition class per million dollars
4 of gross investment.
- 5 • Number of acres treated by mechanical methods.
- 6 • Number of acres treated mechanically with by-products utilized.
- 7 • Number of projects implemented through (local) contractors.
- 8 • Number of communities at risk with completed risk assessments and
9 mitigation plans/ total number of communities listed.
- 10 • Total number of WUI communities at risk with fire prevention programs in
11 place/total number listed.
- 12 • Number of WUI communities at risk that initiated volunteer, community
13 funded, or cost-share efforts to reduce hazardous fuels.
- 14 • Refer to agency specific direction.
- 15 • *FWS - Refer to FIREBASE for specific agency direction.*

17 Prescribed Fire Plans

19 Plan Contents

20 The Prescribed Fire Plan is a stand alone document that provides the Prescribed
21 Fire Burn Boss all the information needed to implement the project. Prescribed
22 fire projects must be implemented in compliance with the written plan. At a
23 minimum, a listing of the required elements to develop a burn plan can be found
24 in all the agency specific direction documents:

- 25 • Refer to agency specific direction.
- 26 • *BLM - Refer to BLM IM OF&A No. 2004-003.*

28 Restrictions

29 Implementation of Prescribed Fires at National Preparedness Levels 4 and 5 is
30 restricted. (See the *National Mobilization Guide*.)

- 31 • **Preparedness Level 4:** WFU and prescribed fire application can be
32 continued or be initiated if the proposed action is approved by an agency at
33 the regional or state office level. This approval must be based on an
34 assessment of risk, impacts of the proposed actions on area resources and
35 activities and include feedback from the Geographic Area MAC Group.
36 The Geographic Area MAC Group provides information or perspective to
37 agencies wishing to proceed with or implement a WFU or prescribed fire
38 application. The final decision to implement resides with the
39 implementing agency.
- 40 • **Preparedness Level 5:** WFU and prescribed fire application can be
41 continued or be initiated if the proposed action is approved by an agency at
42 the regional or state office level. The national agency representative will
43 assess risk and impacts of the proposed action and discuss with the
44 National MAC Group. This group will have the opportunity to provide
45 information or perspective to agencies wishing to proceed with or

1 implement a WFU or prescribed fire application. The final decision to
2 implement resides with the implementing agency.

3

4 **Determination of Complexity**

5 The NWCG *Prescribed Fire Complexity Rating System Guide* is the agency
6 standard for rating prescribed fire complexity. A complexity rating will be
7 completed for each prescribed fire project. The determination of the prescribed
8 fire complexity will be based on an assessment of risk (the probability or
9 likelihood of an unexpected event or situation occurring), and technical
10 difficulty (the level of skills needed to complete the project and deal with
11 expected events).

- 12 • *NPS - Refer to RM 1, chapter 10 for specific agency direction.*
- 13 • *BLM - Refer to BLM IM OF&A No. 2004-003.*

14

15 **Safety and Qualifications**

16

17 **Safety Awareness**

18 All personnel will be briefed prior to any prescribed fire assignment. The
19 briefing will ensure that all people involved understand how the project will be
20 implemented and what their assignments are. Briefings must cover safety
21 considerations for both known site specific hazards and potential hazards. A
22 briefing checklist must be developed and attached to the Prescribed Fire Plan. A
23 briefing will be given for each operational period of multi-period projects.

24

25 A Job Hazard Analysis (JHA) will be completed for each prescribed fire project
26 and attached to each Prescribed Fire Plan.

27

28 **Safety Equipment**

29 All personnel on a prescribed fire project will be equipped with required PPE
30 appropriate to their position or as identified in a JHA. For holding and ignition
31 personnel the minimum PPE (unless otherwise identified in the JHA) is the same
32 as that required for wildland fire assignments. (See Chapter 06, Safety.)

33

34 **Smoke Exposure**

35 Exposure to smoke during prescribed fire operations can be a significant safety
36 concern. Research has shown that exposure to smoke on prescribed fires,
37 especially in the holding and ignition positions, often exceeds that on wildfires.

- 38 • **Planning**

39 Smoke exposure must be considered when planning prescribed fires.
40 Altering line locations can have a significant impact on smoke exposure.
41 Placing fire lines in areas of lighter fuels, or moving lines to roads or other
42 barriers that will require less holding, patrol, and mop up, will significantly
43 reduce the smoke exposure to personnel. The identification of "Buffer or
44 Allowable Areas" (where fire outside the main control line may not need to
45 be aggressively attacked) is a good method to reduce smoke exposure.

46

- 1 • **Implementation**
2 Techniques that can help reduce the exposure of personnel to smoke:
3 ➤ Rotating people out of the heaviest smoke area may be the most
4 effective method of limiting smoke exposure.
5 ➤ Changing firing patterns and pre-burning (black lining) during less
6 severe conditions can greatly reduce exposure to smoke.
7 ➤ The use of retardant, foam, or sprinklers can also significantly reduce
8 the workload and exposure time for holding crews.
9

- 10 • **Qualifications**
11 The NWCG *Wildland and Prescribed Fire Qualification System Guide*
12 (*PMS 310-1*) establishes minimum prescribed fire qualification and
13 training standards for all agencies and provides a complete review of the
14 qualification system and explains the task book process for documenting
15 performance and certifying personnel. Agency personnel assigned to
16 prescribed fire operations will meet the minimum NWCG qualifications,
17 and any additional agency specific qualifications required, even when
18 assisting other agencies.
19 The IQCS does not separate prescribed fire qualifications by fuel group.
20 The local units are responsible for ensuring that Prescribed Fire Burn Boss
21 (RXB1 and 2) qualifications and training are appropriate for the fuel
22 groups(s) that they will be working in.
23 If the Prescribed Fire Burn Boss is not qualified as an IC, a qualified IC
24 will be identified in the Escaped Fire Plan. Additionally, the transition
25 from the Prescribed Fire Burn Boss to the IC needs to be explained.
26 • ***BLM - Prescribed Fire Burn Boss 3 (RXB3):*** *As a supplement to the*
27 *qualifications system, the BLM has identified this position. This position*
28 *supervises prescribed fire operations that are of “low complexity.” These*
29 *types of operations typically would have few personnel assigned, have a*
30 *very low threat of escape, and present a minimal risk to the people*
31 *involved in the operation. Examples include burning piled slash, burning*
32 *landings, ditch burning, debris burning, and broadcast burns of less than*
33 *one acre with a minimal chance for escape. This position is supported by*
34 *the IQCS. The activity area is BL and the position code is RXB3.*
35 *Managers will need to check the requirements individually, since IQCS*
36 *will not check them automatically.*
37

38 **Physical Fitness**

39 Physical fitness levels are not established by the NWCG. The agencies have
40 established physical fitness levels. Refer to agency specific direction

- 41 • ***USFS*** - *Refer to FSH 5109.17 for agency specific direction.*
42 • ***BLM*** - *Refer to BLM IM OF&A No. 2004-003.*
43
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1 **Currency Requirements**

2 The *Wildland and Prescribed Fire Qualification System Guide* sets currency
3 requirements at five years, the same as for suppression qualifications.

4
5 **Prescribed Fire Monitoring**

6 A monitoring plan is required as part of each Prescribed Fire Plan. It describes
7 what data will be collected, when it will be collected, where on the prescribed
8 fire site it will be collected, which methods will be used for each data element,
9 and list the responsible person(s). The requirements for prescribed fire
10 monitoring are found in the agency specific policies. Refer to agency specific
11 direction.

12
13 **Project Financing/Cooperation & Assistance**

14 Funding for the implementation of prescribed fire projects must be identified
15 and agreed to at the local unit office level. It is the responsibility of each
16 program area (non-fire) to cover its own regular (base-eight) salaries and fixed
17 costs. This applies to items such as preliminary site assessments, writing
18 environmental assessments, developing Prescribed Fire Plans, obtaining
19 clearances, training, and monitoring.

20
21 **Federal Agencies Assistance**

22 The FY02 Department of the Interior Wildland Fire Management Appropriation
23 funded the five federal agencies Hazardous Fuels Reduction Programs. Funding
24 was provided for the regular Hazardous Fuels Program and for Wildland Urban
25 Interface Fuels. The Congressional intent for the fuels management program is
26 that, "Interior Agencies and Forest Service should not charge each other for
27 personnel and other resources."

28
29 All federal agency fire directors concur that the general policy of not cross
30 billing is appropriate and meets the congressional intent. Fuels management
31 projects are considered regular planned land management activities as opposed
32 to emergency activities; therefore, offices have the right to turn down requests
33 from other offices to assist in fuels management activities. Offices should not
34 consider providing personnel and resources at the expense of their own target
35 accomplishments, and no office should be placed in a position of subsidizing
36 another office's fuels management activities. Refer to agency specific direction.

- 37 • **BLM** - Refer to *BLM Fiscal Fund Coding Handbook* for agency specific
38 direction.

39
40 Current policy is that hazard pay will not be paid for any prescribed fire.

41
42 **Contractors**

43 Agencies can contract to conduct all or part of the prescribed fire operations
44 and/or all or part of mechanical treatments for "Hazard Fuel Reduction"
45 projects.

1 If a contractor is actively involved in igniting, holding, or mopping up an agency
2 prescribed fire, a Contracting Officer's Authorized Representative (COAR) or
3 Project Inspector (PI) will be on the site (exceptions can be made for late stage
4 mopup and patrol) to ensure that the burn objectives are being met and that the
5 terms of the contract are adhered to. The agency representative (COAR or PI)
6 must have prescribed fire and/or wildfire qualifications equal to what the agency
7 would require if an agency Prescribed Fire Burn Boss were conducting the
8 actual operation.

9 **Casual Firefighter Hire Authority**

10 The DOI has been granted the authority to hire personnel under the pay plan for
11 emergency workers for "fire use" work related to hazardous fuel reduction
12 projects. The term of hire is restricted to no greater than 300 hours per year per
13 person for emergency hazardous fuel reduction work.

14 Complete guidance for the use of this authority can be found in Chapter 20,
15 Administration. Refer to agency specific direction.

- 16 • *FS - Forest Service has no authority for AD hiring plan to be used in*
17 *Hazardous Fuel projects.*

18 **Conversion to Wildfire**

19 A prescribed fire will be declared a wildfire when the assigned Burn Boss
20 determines that one or more of the following conditions or events has occurred
21 or is likely to occur, and if these conditions cannot be mitigated within the next
22 burning period by implementing the contingency actions in the prescribed fire
23 plan by on-site holding forces and listed contingency resources staged during
24 this operational period:

- 25 • The prescribed fire leaves the planned unit boundary.
- 26 • The fire behavior exceeds limits described in the prescribed fire plan
27 and/or the fire is threatening to leave the planned unit boundary.
- 28 • The fire effects are unacceptable.
- 29 • Smoke production must be reduced because of adverse air quality impacts.
- 30 • Local and/or geographic area fire activity escalates and resources
31 committed as contingency or holding forces are needed for re-assignment
32 to other incidents.

33 After wildfire declaration, a prescribed fire project is over. A Wildland Fire
34 Situation Analysis will define appropriate future management action.

35 **Actions**

36 When a prescribed fire is declared a wildland fire, managers still have the full
37 range of suppression options available under the concept of the "Appropriate
38 Management Response." If a prescribed fire is declared a wildfire, an agency
39 specific "Fire Number" will be assigned and all suppression costs will be
40 charged to it.

- 1 The following actions will be taken on all prescribed fires that escape and are
2 declared wildland fires:
- 3 • Take prompt and reasonable action to control and suppress the fire. This
4 could include the development of a WFSA.
 - 5 • Notify the agency administrator responsible for the area.
 - 6 • Notify the other agency administrator(s), and/or other landowners that may
7 be affected, of the escaped fire. Coordinate suppression actions with the
8 other affected parties.
 - 9 • Document the time and environmental conditions that existed when the
10 escape occurred.
 - 11 • Document the incident, including all actions prior to and after the escape.
12 Set up a file that includes all pertinent information, i.e., the Prescribed Fire
13 Plan, a chronology of events including the prescribed fire report and unit
14 logs or individual statements, the fire investigation report, weather
15 forecasts including any spot forecasts, Remote Automated Weather Station
16 (RAWS) data and National Fire Danger Rating System (NFDRS) data for
17 the day of the escape for the nearest weather stations, photos, and any
18 appraisal of damages.

19 **Reviews**

20 **Escaped Prescribed Fire**

21
22
23 Escaped prescribed fires will receive an administrative review. The level and
24 scope of the review will be determined by the injuries, damage, and cost
25 associated with the escape.

26
27 A prescribed fire that escapes and requires an expenditure of suppression funds
28 or results in property damage, injuries, or fatalities will be investigated. The
29 following guidelines apply to escaped prescribed fire reviews:

30 Refer to agency specific direction.

- 31 • **BLM** - Refer to BLM IM OF&A No. 2004-003.
- 32 • **BLM - Fire Management Officer** - The FMO is required to make an
33 investigation of escaped prescribed fires either personally or through an
34 appropriate designated investigator.
- 35 • **BLM - Field Office Manager** - The Field Office Manager has the
36 responsibility for ensuring adequate and proper investigation of all
37 escaped prescribed fires that result in personal injuries, burn onto private
38 or other agency land, or requiring expenditures of up to \$50,000 for
39 suppression and/or damage to property. The field office manager may
40 appoint an investigation team or request that one be appointed. The Field
41 Office Manager will notify the State Director of escaped prescribed fires
42 meeting the above criteria within 24 hours. Copies of the completed
43 review report will be sent to the State Director, SFMO and to the Director,
44 Office of Fire and Aviation.

- 1 • **BLM - State Director** - State Directors have the responsibility for ensuring
2 adequate proper investigation of all prescribed fire escapes resulting in
3 serious or multiple personal injuries, significant burned area on private or
4 other agency lands, or have an estimated expenditure of from \$50,000 to
5 \$100,000 for suppression and/or property damage.
- 6 • **BLM** - The State Director will notify the Director, Office of Fire and
7 Aviation, of escaped prescribed fires meeting the above criteria within 24
8 hours. Copies of the completed review report will be sent to the Director,
9 Office of Fire and Aviation. The Director is responsible for ensuring
10 adequate and proper investigation of all prescribed fire escapes resulting
11 in fatalities, injuries to people not involved in the prescribed fire smoke
12 significantly impacting a major population center or causing a public
13 health concern, or where suppression expenditures and/or property
14 damage will exceed \$100,000.
- 15 • **BLM** - The documentation required for a review are those listed below. A
16 review team will be provided with all of the original documents related to
17 the incident.
- 18 ➤ Those items listed under (Actions) above.
 - 19 ➤ The Prescribed Fire Plan and all attachments.
 - 20 ➤ Documents pertaining to the qualifications and experience of the
21 Prescribed Fire Burn Boss, Ignition Specialist, Holding Specialist,
22 and other key overhead. This would include Red Cards, training and
23 experience records, and Position Task Book.
 - 24 ➤ Dispatch logs, radio logs, and any aviation records or logs.
- 25 • **FS** - Refer to FSM 5190 for agency specific direction.

27 **Prescribe Fire Program Review**

28 Refer to Agency Specific Direction.

- 29 • **BLM - Fuels Management/Community Protection and Assistance**
30 **Program Review**
31 *National Fuels Management/Community Protection and Assistance*
32 *Program Reviews are conducted annually. The purpose of these reviews is*
33 *to evaluate the states' programs against established standards, identify*
34 *deficiencies, develop corrective actions, and to make recommendations*
35 *designed to enhance or improve the program. The reviews consist of*
36 *several major elements, of which safety is the primary concern. These*
37 *elements include:*
- 38 ➤ *Management Direction and Considerations*
 - 39 ➤ *Organization and Staffing*
 - 40 ➤ *Community Assistance*
 - 41 ➤ *Planning*
 - 42 ➤ *NEPA*
 - 43 ➤ *Budget*
 - 44 ➤ *Business Practices*
 - 45 ➤ *Reporting*
 - 46 ➤ *Risk Assessment and Mitigation Plans*

- 1 ➤ *Training and Qualifications*
- 2 ➤ *Safety*
- 3 ➤ *Fuels Treatment Procedures and Practices*
- 4 ➤ *Record Keeping*
- 5 • ***BLM*** - *Review teams will include national fuels/community protection and*
- 6 *assistance program lead, agency administrator, fire manager, program*
- 7 *analyst, safety, fuels and mitigation technical specialist. (Other technical*
- 8 *specialists as required, i.e., contracting, resource specialist, etc.)*
- 9 *Expertise should be gathered from diverse backgrounds, and should*
- 10 *include cooperators.*