Appendix E:

BLM Alaska Structure Protection Policy February 2007

Kobuk-Seward Peninsula Proposed RMP/Final EIS

BLM Alaska Structure Protection Policy February 2007

The following policy and procedures are meant to serve as guidance to the Alaska Fire Service (AFS) and the Alaska Division of Forestry (DOF), as appropriate, concerning cabin/structure protection priorities in relation to wildland fire monitoring and suppression activities on lands managed by the Bureau of Land Management in Alaska. Item 2 lists the protection priorities on BLM managed lands. This policy recognizes that availability of resources may preclude protection of some sites indicated for protection during portions of the fire season.

- 1. The safety of the public and fire suppression personnel will remain the first priority when fire suppression/protection decisions are made.
- 2. The Bureau of Land Management (BLM) will provide protection of structures on Bureau lands using the following criteria:
 - a) Regardless of the value of the cabin/structure, the protection and safety of human life will take precedence. This means that high value cabin/structures may not be protected if suppression puts human life at risk. Conversely, low value cabin/structures may be protected to ensure public safety.
 - b) It is necessary to preserve structures to save human life due to an imminent threat of the structure(s) being burned over.
 - c) If the structure has been evaluated and is on or has been determined to be eligible for the National Register of Historic Places.
 - d) If the structure has not been evaluated for eligibility to the National Register of Historic Places, the Evaluating Structures for Historic Value process (attached below) will be initiated.
 - e) Public funds have been expended in the construction and/or maintenance of the structure. These federal facilities should receive protection commensurate with their monetary or resource management value as established by the Field Office Manager.
- 3. Field Offices will initiate the actions to reduce hazardous fuels adjacent to federal facilities, structures that have been identified for protection.
- 4. The policy for unauthorized structures will be consistent with policy items 1-3 above.
- 5. Decisions made pursuant to this policy will be recorded on the fire map atlas. Keeping the fire maps current is a joint responsibility of the field office specialist, field office fire personnel, and the AFS/DOF fire management officers. Changes in fire maps should be initiated as part of the annual fire plan. Part of the annual review will be to re-evaluate any fire operations that included cabin/structure protection actions in the preceding year.

Evaluating Structures for Historic Value

The Normal Situation

The current fire map atlas or an equivalent source will be kept updated with current information, including protection standards for structures based in part on an assessment of their historic value. Part of this historic assessment will be a determination of eligibility arrived in consultation with the State Historic Preservation Officer in exactly the same fashion as we do for other activities.

Sites will be designated for full protection unless they have been determined to be not eligible for the National Register.

In a Wildfire Situation

In a wildfire situation, it may be necessary to try to determine appropriate levels of protection for structures whose eligibility to the National Register has not been determined, or it may be necessary to provide priorities among structures designated for full or critical protection. In those cases, the following process will be followed. All decisions that are based on this process will be documented and submitted to the Field Office Manager.

- 1. A qualified cultural resource specialist is available.
 - 1.0 If at all possible¹, a qualified cultural resource specialist will evaluate structures to determine if they appear to have sufficient historic value to warrant protection. The specialist will also try to assign relative value to multiple structures so that resources can be concentrated on the most important sites.
 - 1.1 If time and circumstances allow, the cultural resource specialist will arrive at determinations of historic value only after an on-site visit to the structures involved.
 - 1.2 If circumstances do not allow for an on-site visit by a cultural resource specialist, the determination will be made by the cultural resource specialist on the basis of the best available information.
 - 1.2a If AFS/DOF personnel can get to the site, they should try to obtain the following information for use by the cultural resource specialist:
 - photograph(s) digital or Polaroid images
 - number of structures
 - conditions of structures (collapsed, standing, ruin)
 - construction materials (logs, plywood, sheet metal)
 - associated features (bottle/can dumps, equipment)

¹ If the home Field Office cultural resource specialist is not available, attempts will be made to contact a cultural resource specialist from another Field Office or the State Office to provide assistance.

- 1.2b Use of a standard data gathering form, which would be available for fire personnel, is encouraged. This would greatly facilitate determinations of the historic value of structures and sites.
- 1.3 Once information has been gathered regarding structures involved in a wildfire situation, protection status and protection priorities will be made after communication with the State Historic Preservation Office (SHPO) if time and circumstances allow. Use of current technology may assist in this communication. (For example, digital images might be gathered and posted on a web page or transmitted via e-mail.)
 - 1.3a If circumstances do not allow for communication with the SHPO, a determination of historic value will be made by the cultural resource specialist.
- 2. A qualified cultural resource specialist is not available.
 - 2.0 Historic evaluations will be made by the Field Office fire personnel.²
 - 2.1 Training will be provided to the Field Office fire personnel to allow him/her to better make these evaluations. The details and extent of this training will be worked out by the FMO and the field archaeologists
- 3. If the Field Office Manager or their acting cannot be contacted
 - 3.0 If no other options are available, evaluations should be made by AFS/DOF personnel on site. The following is meant to provide some guidance in making these evaluations.
 - 3.1 An older structure is probably more important than a younger one. Several characteristics of structures can be used to estimate relative age, such as the state of collapse; construction materials (logs vs. plywood); vegetation re-growth around the structure; and associated artifacts (wagon vs. 1934 Dodge)
 - 3.2 A settlement, meaning a site with multiple dwelling structures, is probably more *important* than a single structure.
 - 3.3 A site with a single dwelling structure and associated outbuildings, such as barns, sheds, outhouses or caches, is more important than an isolated structure.
 - 3.4 A site with associated non-structural features, such as can or bottle dumps is probably more important than one without.

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² If the home Field Office fire personnel are not available, attempts will be made to contact the Field Office Manager or their acting.

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