

Reclamation Manual

Directives and Standards

Subject:	Wildland Fire Management (WFM)
Purpose:	This Directive and Standard (D&S) provides direction for implementing and managing the Bureau of Reclamation's WFM program in compliance with existing law and Department of the Interior requirements. This D&S benefits Reclamation by ensuring program consistency between Reclamation and other Department bureaus with established WFM programs. Reclamation benefits by improved efficiency and effectiveness of Reclamation's WFM program.
Authority:	The statutes, regulations, and policies underlying Reclamation's responsibility for WFM are listed in Paragraph 10 of Reclamation Manual (RM) Policy, <i>Wildland Fire Management (WFM)</i> , LND P14.
Approving Official:	Director, Policy and Administration
Contact:	Land Resources Office (84-53000)

- 1. Introduction.** Department policy requires Reclamation, along with other Department bureaus, to participate in WFM. This D&S sets the framework for Reclamation wildland fire management activities (WFM activities), including, but not limited to, entering agreements with other Federal, state, and local agencies; reporting wildfires; creating fire management plans (FMPs); responding to and stabilizing burned areas; and implementing other WFM tasks and duties.
- 2. Applicability.** This D&S applies to all withdrawn or acquired lands under Reclamation's jurisdiction. It does not apply to those lands in which Reclamation's interest arises from a lease, permit license, or an easement. For Reclamation lands managed by a Federal or non-Federal managing partner, future management agreements or contracts must satisfy the requirements of this D&S. If the current management agreement does not require such action by the managing partner, then the responsibility for compliance will remain with Reclamation.
- 3. Definitions.**
 - A. Agency Administrator.** Agency Administrator is the person in Reclamation, such as a regional director, a contracting officer, or an area manager, who is delegated a specific responsibility under the WFM program. Examples of WFM administrative responsibilities are signing interagency agreements (IAs), contracts, and cooperative agreements; and approving FMPs and prescribed fire burn plans (burn plans).
 - B. Burned Area Emergency Response.** Burned Area Emergency Response (BAER) consists of planned actions to stabilize and prevent unacceptable degradation to natural

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and cultural resources, to minimize threats to life or property resulting from the effects of a fire, or to repair, replace, and/or construct physical improvements necessary to prevent degradation of land or resources.

- C. **Contract.** Contract means a mutually binding legal relationship obligating the seller (e.g., a non-Federal agency) to furnish the supplies or services (including construction) and the buyer (Reclamation) to pay for them. In contrast to “cooperative agreements” the principal purpose of a contract is to acquire “property or services for the direct benefit or use of the United States Government.”
- D. **Cooperative Agreements.** Cooperative agreements are financial assistance agreements with non-Federal agencies to meet needs for wildfire suppression and/or prescribed fire services. The “principal purpose” of a cooperative agreement must be “to transfer a thing of value” to the non-Federal agency “to carry out a public purpose,” and not to acquire “property or services for the direct benefit or use of the United States Government.” Refer to RM D&S, *Financial Assistance Management (Grants and Cooperative Agreements)*, ACM 01-01, for more information. (Please note that “cooperative agreement” is also used informally to describe any collaborative agreement between wildfire suppression agencies.)
- E. **Fire Executive Council.** The Fire Executive Council is a group formed to provide "coordinated interagency federal executive level wildland fire policy leadership, direction, and program oversight." Its membership is comprised of representatives from the Department of the Interior, the US Forest Service, and the Department of Homeland Security.
- F. **Fire Management Plan.** An FMP is a plan which identifies and integrates all WFM and related activities within the context of approved land, resource, and facility operation and management plans. An FMP defines a program to manage wildland fires (wildfire, prescribed fire, and wildland fire use). The FMP is supplemented by operational plans, including but not limited to preparedness plans, preplanned dispatch plans (annual interagency operating plans), burn plans, and fire prevention plans. FMPs assure that WFM goals and components are coordinated and approved by line management.
- G. **Hazard Fuel.** A fuel complex defined by kind, arrangement, volume, condition, and location that presents a threat of ignition and resistance to control.
- H. **Interagency Agreements.** IAs are agreements with Federal agencies to acquire wildfire suppression and/or prescribed fire services for Reclamation.
- I. **Managing Partner.** A managing partner is an entity with whom Reclamation has entered into an agreement or contract to manage lands and/or facilities under Reclamation’s jurisdiction. Examples of WFM managing partners include, but are not limited to, water user organizations and state parks departments.

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- J. **National Wildfire Coordinating Group.** The National Wildfire Coordinating Group (NWCG) is a group formed under the direction of the Secretaries of the Departments of the Interior and Agriculture to improve the coordination and effectiveness of wildland fire activities and to coordinate programs of the participating wildfire management agencies so as to avoid wasteful duplication and to provide a means of constructively working together. The group provides a formalized system to agree upon standards of training, equipment, qualifications, and other operational functions. The NWCG published in October 2007 an extensive (186 pages) “Glossary of Wildland Fire Terminology.”
- K. **Prescribed Fire.** A prescribed fire is any fire ignited by management actions to meet specific objectives. A written, approved prescribed fire plan must exist, and requirements specified in the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) must be met prior to ignition.
- L. **Prescribed Fire Burn Plan.** A plan required for each fire application ignited by management. Burn plans are documents prepared by qualified personnel, approved by the agency administrator, and include criteria for the conditions under which the fire will be conducted (a prescription).
- M. **Red Card.** The Red Card is an illustration of the current wildland fire qualifications of an individual. It is part of the fire qualifications management system used by many state and all Federal WFM agencies. All firefighters assigned to a fire being managed by a Federal agency, such as the US Forest Service, Bureau of Land Management, National Park Service, Bureau of Indian Affairs, or US Fish and Wildlife Service, and many state agencies are required to have a Red Card. The Red Card shows that the holder of the card has completed all the course work and training required for a particular position.
- N. **Wildfire.** An unplanned, unwanted wildland fire including unauthorized human-caused fires, escaped wildland fire use events, escaped prescribed fire projects, and all other wildland fires where the objective is to put the fire out.
- O. **Wildfire Suppression.** An appropriate management response to wildfire (including escaped wildland fire use or escaped prescribed fire) that results in curtailment of fire spread and eliminates all identified threats from the particular fire.
- P. **Wildland.** An area in which development is essentially non-existent, except for roads, railroads, dams, canals, pipelines, powerlines, and similar facilities. Structures, if any, are widely scattered.
- Q. **Wildland Fire.** Any non-structure fire that occurs in the wildland. The three distinct types of wildland fire that have been defined are wildfire, wildland fire use, and prescribed fire.

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- R. **Wildland Fire Management Activities.** WFM activities include, but are not limited to, fire management planning, fire management strategies, wildfire suppression tactics and alternatives, fire prevention and education programs, fire preparedness, hazard fuels reduction, post-fire rehabilitation and restoration activities, and fire training.
 - S. **Wildland Fire Use.** The application of the appropriate management response to naturally-ignited wildland fires to accomplish specific resource management objectives in pre-defined designated areas outlined in FMPs.
 - T. **Wildland Urban Interface.** Wildland Urban Interface (WUI) is the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels.
4. **Responsibilities.** In addition to the responsibilities established in Paragraph 4 of LND P14, the following responsibilities are established:
- A. **Area Manager.** Area manager responsibilities concerning WFM include:
 - (1) when delegated responsibility, develop and implement WFM, including FMPs on Reclamation lands under area office jurisdiction;
 - (2) when delegated responsibility, negotiate IAs with other Federal agencies or contracts or cooperative agreements with Indian tribes, state agencies, or local agencies, for WFM purposes;
 - (3) determine if WFM costs are reimbursable by Reclamation and report unbudgeted costs to the regional director;
 - (4) determine, with regional director approval, if it is in the best interest of the United States to pursue recovery of damages and costs for human-caused fires; and
 - (5) when delegated authority, approve final burn plans.
 - B. **Regional Fire Management Officer/Fire Program Manager.** Regional Fire Management Officer (FMO)/Fire Program Manager (FPM) responsibility for WFM includes coordinating all wildfire suppression agreements, fire prevention and education programs, burn plans, hazard fuels reduction programs, fire reporting, and interagency WFM activities.
 - C. **Grants Officer.** Grants officer responsibility for cooperative agreements used in WFM includes:
 - (1) providing consultation to regional directors and area managers; and

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- (2) approving and executing the cooperative agreement, as necessary, to obligate funds.

D. **Contracting Officer.** Contracting officer responsibility for contracts used in WFM includes:

- (1) providing consultation to regional directors and area managers; and
- (2) approving and executing the contract, as necessary, to obligate funds.

5. Department Requirements.

A. **Federal Wildland Fire Management Policy.** The 2001 Federal Wildland Fire Management Policy (FWFMP) is a comprehensive statement of wildland fire policy coordinated between and adopted by the Departments of the Interior and Agriculture (Departments). In 2001, the Secretary of the Interior instructed the Deputy Commissioner of the Bureau of Indian Affairs; the Commissioner of Reclamation; and the Directors of the Bureau of Land Management, National Park Service, Fish and Wildlife Service, and Geological Survey to implement the FWFMP.

B. **Guidance for Implementation of Federal Wildland Fire Management Policy.** The Fire Executive Council approved the (2009) "Guidance for Implementation of Federal Wildland Fire Management Policy." To implement the FWFMP, the guidance advises departments and agencies to "review and revise, as appropriate, all manuals, handbooks, guidebooks, plans, agreements and other pertinent documents." The 2009 guidance replaces the 2003 "Interagency Strategy for the Implementation of the Federal Wildland Fire Management Policy."

C. **Department Policy.** In establishing and maintaining its WFM program, Reclamation will follow Department policy on WFM as described in the Department Manual, Series 34-*Public Land*, Part 620 *Wildland Fire Management*, Chapter 1, *General Policy and Procedures* ([620 DM 1](#)) and Chapter 3, *Burned Area Emergency Stabilization and Rehabilitation* ([620 DM 3](#)). (Department policy is available on the Electronic Library of Interior Policies web pages.)

6. **Coordination with Other Entities.** Reclamation will ensure that appropriate WFM planning, wildfire suppression, prevention, hazard fuels reduction, and BAER work is performed on lands for which this D&S is applicable (see Paragraph 2).

7. **Managing Partner Agreements.** When managing partners are responsible for wildfire suppression and related activities, Reclamation will retain responsibility for oversight to ensure the requirements of the FWFMP are met. When managing partners are not responsible for wildfire suppression and related activities, Reclamation will retain all responsibility to ensure the requirements of the FWFMP are met.

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8. **Preparation of Fire Management Plans.** Each region will ensure that FMPs are developed for all Reclamation lands with burnable vegetation. For Reclamation lands managed by a Federal or non-Federal managing partner, future management agreements or contracts must satisfy this FMP development requirement. If the current management agreement does not require such action by the managing partner, then the responsibility for FMP development will remain with Reclamation. When a partner, such as a state or local agency, contractually manages Reclamation land, Reclamation will, after review, adopt the partner's FMP, if an area manager determines the plan satisfies the requirements of this D&S. Funding for FMP development will be delineated through IAs or cooperative agreements with the managing agencies as appropriate. At a minimum, FMPs will:
- A. Analyze and define how to manage wildland fire program elements including fire prevention, wildfire suppression, prescribed fire, and hazard fuels reduction.
 - B. Identify objectives and goals for the fire management program in a given geographic area.
 - C. Whenever possible, be developed concurrently with a land use or resource management plan development process, or be based on a current approved land use or resource management plan, with the intent to meet the goals and objectives of the land use or management plans.
 - D. Consider and, as much as possible, coordinate with Standing Operating Procedures and Emergency Action Plans for applicable Reclamation facilities, such as dams and power plants.
 - E. Follow the requirements and the interagency strategies for the implementation of the FWFMP.
 - F. Follow interagency guidelines for development and use of FMP templates generally accepted among WFM agencies.
 - G. Be developed, to the greatest extent possible, in collaboration with neighboring land management entities to meet FWFMP goals. Where the WFM program crosses jurisdictional boundaries or where program coordination is essential, the FMP will require interagency coordination.
 - H. Describe and evaluate the wildfire suppression and management capabilities of wildfire suppression entities responsible for the area covered by the FMP to achieve FMP objectives and meet NWCG standards.
 - I. Meet NEPA and NHPA requirements for implementation of the FMP.

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9. **Wildfire Suppression.** Reclamation will, as necessary, establish agreements or contracts with Federal agencies, non-Federal land management entities, or other wildfire suppression organizations for wildfire suppression on Reclamation lands.
10. **Other Wildland Fire Management Activities**
- A. **Hazard Fuels Reduction.** Reclamation will undertake programs to reduce hazard fuels, especially in WUI areas and where Reclamation has significant facilities. Reclamation will accomplish this through in-house personnel and resources, through IAs with Federal agencies, through cooperative agreements or contracts with Indian tribes, state agencies, or local agencies, or through private contractors. Reclamation will undertake such programs in the most cost effective manner, based upon funding, staff expertise, available resources, and other pertinent factors.
 - B. **Stabilization and Rehabilitation.** Reclamation will conduct BAER, directly, or through agreements or contracts, to stabilize and to prevent further degradation of Reclamation lands or resources due to a recent wildland fire. As needed, Reclamation will directly, or through agreements or contracts, undertake burned area rehabilitation to facilitate recovery of Reclamation land to management-approved conditions. These actions are intended to protect and sustain ecosystems, public health and safety, and operational and water storage/conveyance facilities or features. Stabilization and rehabilitation actions also protect community infrastructures.
 - C. **Reporting Hazard Fuels Reduction and Burned Area Emergency Response.** Reporting of hazard fuels reduction and BAER project accomplishments will be done using the National Fire Plan Operations and Reporting System.
11. **Department Standards.** All Reclamation wildfire suppression, prescribed fire, and BAER work will be performed to Department standards as outlined in applicable sections of the Department Manual. At a minimum this will include the following:
- A. **Wildfire Suppression.** Only agencies, contractors, or individuals meeting the Department's approved position qualifications and standards are to provide wildfire suppression for Reclamation lands. (See the NWCG's Wildland Fire Qualification System Guide.)
 - B. **Prescribed Fire Activities.** Only agencies, contractors, employees, or other individuals meeting the Department's approved position qualifications will perform prescribed fire activities on Reclamation lands. All prescribed fire planning, preparation, and implementation will adhere to the Department's approved standards. No prescribed fire ignition will be undertaken without an approved burn plan. (See the [2008 Interagency Prescribed Fire Planning and Implementation Procedures Guide](#).)
 - C. **Prescribed Fire Approval.** All burn plans must be technically reviewed and approved for application by an individual qualified at the level of complexity for the planned

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burn. If re-delegated from the Commissioner, final approval of the burn plan will be made at a management level not lower than that of the area manager. Programmatic burn plans may be prepared for facility, feature, or area office geographic areas with similar fuel types, under similar working conditions, and using similar firing methods (e.g., pile burning).

- D. **Burned Area Emergency Response Activities.** At a minimum BAER activities undertaken by Reclamation will conform to the Department's requirements described in 620 DM 3.
 - E. **Environmental Compliance.** The necessary appropriate NEPA documentation will be completed for all hazard fuels reduction projects, burn plans, and BAER activities before implementation. In addition, compliance with the NHPA must be completed according to RM D&S, *Cultural Resources Management*, LND 02-01. When appropriate, the Department's categorical exclusions for these activities will be used.
12. **Staffing.** Regional directors and other Reclamation managers will ensure adequate staffing to implement Reclamation's WFM program. At a minimum, this will require the designation of a regional FMO/FPM position. The FMO/FPM position may be either a full-time or collateral duty position depending upon the workload.
13. **National Fire Program Support.** Reclamation will strive, whenever possible, to support the national wildfire suppression effort by developing and maintaining, as appropriate, fire incident qualifications of personnel in the national Incident Qualifications and Certification System (IQCS) or other official reporting system. Managers will provide staff with needed backgrounds for training and qualification development for obtaining and maintaining a valid Red Card.
- A. During national preparedness levels 1, 2, 3, and 4 (as established by the National Multi-Agency Coordination Group), supervisors may decline to make an IQCS qualified employee available due to home unit work-load requirements. At national preparedness level 5, it will be mandatory to allow non-critical IQCS qualified employees to participate in fire assignments for up to 14 days at a time.
 - B. Some of the high demand skill and knowledge positions which regional directors will make available for training and qualification for wildfire suppression efforts are geographic information system specialists, infrared interpreters, rehabilitation specialists, hazardous materials specialists, logistics specialists, etc. Wildfire suppression training for these positions will be funded from regional or area office lands resource management or WFM budgets, as available.
14. **Reimbursability.** Many of the costs associated with WFM activities conducted by Reclamation, and by others for Reclamation, are reimbursable. These costs are either reimbursed by Reclamation for activities conducted by other agencies or entities for Reclamation, or by others if Reclamation conducts WFM activities for them.

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- A. **Wildland Fire Management Costs Reimbursable by Reclamation to Others.** When other entities provide WFM services and support to Reclamation, a determination must be made on the reimbursability of these activities (e.g., another Federal or state agency suppresses a wildfire on Reclamation land). Project-specific legislation, Department policies, existing cooperative agreements and contracts with these entities, and other Reclamation policy will be consulted during the determination process. When determined that the cost(s) is/are reimbursable by Reclamation, reimbursement will be made in a timely manner. Determinations will be made by the area manager, unless otherwise indicated by the regional director or Deputy Commissioner, Operations.
- B. **Wildland Fire Management Costs Reimbursable by Others to Reclamation.** This category of reimbursability occurs when Reclamation provides services and support to others. Determinations of reimbursability and reimbursement will be accomplished according to the process and requirements delineated in Appendix A.
- C. **Funding.** Funds for reimbursement of incurred WFM costs may come from a number of sources. Wildland fires are by their nature unpredictable and untimely, and the costs incurred in responding to and managing for them will vary greatly, depending on a large number of factors and variables. Where practical, other sources of funds (e.g., Department and other bureau) will be used in place of reimbursement for wildfire suppression costs (e.g., other Federal agencies can suppress, and absorb the cost of, any wildfire which poses a threat to their own lands). When other sources of funds are unavailable, area office funds will be used as deemed practical by the area manager and excess costs thereafter will be reported to the regional director. Available regional funds will be identified and used where practical. Any remaining excess costs will be reported to the Director, Program and Budget, for final disposition. Transfers of and requests for funds will follow applicable budget protocols and procedures.
- D. **Project Operations and Maintenance Reimbursable Costs.** Costs incurred by Reclamation for WFM activities, including wildfire suppression may be reimbursable by project beneficiaries. Appendix A illustrates some examples of WFM related costs which may, or may not, be reimbursable by project beneficiaries.
15. **Wildland Fires Caused by Humans.** This title refers to the occurrence of unwanted and unplanned wildland fires on Reclamation lands where the source of ignition is human-caused. The initial determination of the ignition as being human-caused usually results from an eyewitness report or with the arrival of the initial attack incident commander at the fire scene. Reclamation will determine whether to formally investigate a fire for human involvement based on the responding agency's initial attack fire report. If an investigation is pursued and an identifiable individual, organization, or agency is determined to be responsible, a determination as to whether it would be in the best interests of the United States to pursue recovery of damages and costs will be made by the appropriate Reclamation official. The appropriate Reclamation official will usually be a regional director or an area manager with regional director approval.