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 (Reclamation) WFM Program

in compliance with existing law and Department of the Interior

(Department) requirements. This D&S benefits Reclamation's WFM Program by improving efficiency and effectiveness and ensuring consistency between Reclamation and other Department bureaus with

established WFM programs.

Authority: The Reclamation Act (Act of June 17, 1902, ch. 1093, 32 Stat. 388);

> Protection of Timber Act of September 20, 1922 (ch. 349, 42 Stat. 857; 16 U.S.C. § 594); Economy Act of June 30, 1932 (47 Stat. 417; 31 U.S.C. § 1535); Soil Conservation and Domestic Allotment Act of 1935 (ch. 85, 49 Stat. 163, 16 U.S.C. § 590a, et seq.); Reciprocal Fire Protection Act of 1955 (ch. 105, 69 Stat. 66; 42 U.S.C. §§ 1856-1856d); Robert T. Stafford Disaster Relief and Emergency Assistance Act, as amended (Pub. L. 93-288, as amended; 88 Stat. 143; 42 U.S.C. §§ 5121-5206.); Federal Fire Prevention and Control Act of October 29, 1974 (Pub. L. 93-498; 88 Stat.

1535; 15 U.S.C. § 2201, et seq.); Federal Grant and Cooperative

Agreements Act of 1977 (Pub. L. 95-224; 92 Stat. 3; 31 U.S.C. §§ 6301-6308); Supplemental Appropriations Act of 1982 (Pub. L. 97-257, Title I, ch. VIII; 96 Stat. 837); Temporary Emergency Wildfire Suppression Act of 1988 (Pub. L. 100-428; 102 Stat. 1615), as amended by the Wildfire Suppression Assistance Act of April 7, 1989 (Pub. L. 101-11; 103 Stat. 15; 42 U.S.C. §§ 1856m–1856p); Healthy Forests Restoration Act of 2003 (Pub. L. 108-148; 117 Stat. 1887; 16 U.S.C. § 6501, et seq.); Energy and Water Development Appropriations Act of 2006 (Pub. L. 109-103; 119 Stat. 2247; 33 U.S.C. § 2221); 620 Departmental Manual (DM) 1-7, Wildland Fire Management; 604 DM 2, Landscape Level Management, Conservation and Restoration of Sagebrush Biome; 2001 Federal Wildland Fire Management Policy; and Department of the Interior

Service First Authority (43 U.S.C. § 1703), as amended.

Approving Official: Director, Dam Safety and Infrastructure

Contact: Asset Management Division (86-67200)

Introduction. Department policy requires Reclamation, along with other bureaus, to participate in WFM. This D&S sets the framework for Reclamation WFM activities, including, but not limited to, entering into agreements with other Federal, state, and local agencies for suppression and related activities; reporting wildfires; preparedness such as creating fire management plans (FMPs); wildfire education; training; stabilization; post-fire recovery; prescribed fire; and fuels management.

- 2. **Applicability.** This D&S applies to all withdrawn or acquired land under Reclamation's jurisdiction. It does not apply to land in which Reclamation's interest arises from a lease, permit license, or an easement. For Reclamation land 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's Regional Wildland Fire Program Coordinators (Regional Coordinators) until the new management agreement or contract is negotiated.
- 3. **Federal Wildland Fire Management Policy (FWFMP).** The 2001 FWFMP is a comprehensive statement of wildland fire policy coordinated between and adopted by the Department and the Department of Agriculture. 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.
 - A. Guidance for Implementing the FWFMP. The Wildland Fire Executive Council (WFEC) approved the *Guidance for Implementation of Federal Wildland Fire Management Policy* (2009), which advises departments and agencies to "review and revise, as appropriate, all manuals, handbooks, guidebooks, plans, agreements and other pertinent documents."
 - B. **FWFMP Implementation Responsibility.** Under Reclamation Manual (RM) Policy, Recreation Program Management (LND P04), RM D&S, Recreation Program Management (LND 01-03), and RM Policy, Land Program Management (LND P06), Reclamation has control, decision-making authority, and ultimate responsibility for land and resource management, including the management of all natural and cultural resources and associated programs on land and waterbodies under its jurisdiction. Reclamation will assign responsibilities, such as wildfire suppression and related activities, by clearly defining the managing partner's responsibility in the management agreement or other appropriate agreement or contract. Reclamation will provide oversight to ensure that the managing partner is meeting the requirements of the FWFMP. When management agreements do not assign responsibility for wildland fire suppression and related activities to managing partners, Reclamation will retain all responsibility to ensure requirements of the FWFMP are met.
- 4. **Department Policy.** In establishing and maintaining the WFM Program, Reclamation will follow Department policy as described in 620 DM.
- 5. **WFM Activity Standards.** All Reclamation fuels management, burned area rehabilitation (BAR), prescribed fire, and wildfire suppression work will be performed to Department standards as outlined in the DM. Regional Coordinators will work with Reclamation staff to meet the following standards.

- A. **Environmental Compliance.** Before work begins on fuels management, post-fire recovery, or prescribed burn activities, Reclamation will complete and submit the necessary National Environmental Policy Act (NEPA) documentation and verify compliance with the National Historic Preservation Act of 1966 (NHPA) according to RM D&S, *Cultural Resources Management (CRM)* (LND 02-01). When appropriate, the Department's categorical exclusions for these activities will be used.
- B. **Fuels Management.** Reclamation will establish fuels management programs, especially in wildland urban interface areas and near at-risk Reclamation facilities. This is accomplished through in-house personnel and resources; interagency agreements with Federal agencies; cooperative agreements or contracts with Indian tribes, state agencies, or local agencies; or private contractors. Reclamation will manage programs in the most cost-effective manner, considering funding, staff expertise, available resources, and other pertinent factors. Reclamation will conform to the Department's requirements described in 620 DM 6.
- C. **Post-Fire Recovery.** Post-fire recovery has multiple phases including emergency stabilization (ES) and long-term recovery and BAR. Associated activities are intended to protect and sustain ecosystems, public health and safety, community infrastructures, and operational and water storage/conveyance facilities or features. ES actions stabilize and prevent unacceptable degradation to natural and cultural resources, minimize threats to life and property resulting from effects of a fire, or repair/replace/construct physical improvements necessary to prevent degradation of lands or resources within one year after containment of the wildland fire. BAR activities are non-emergency actions taken up to five years after containment of the wildland fire, such as seeding, treating noxious weeds, or replacing fences, to improve fire-damaged lands that are unlikely to recover naturally.
 - (1) Initiating Fuels Management and Post-Fire Recovery Activities. As needed, Reclamation will undertake ES and BAR activities to facilitate recovery of Reclamation land to management-approved conditions (general operational guidance can be found in the *Interagency Burned Area Emergency Response Guidebook and Interagency Burned Area Rehabilitation Guidebook*). Activities initiated by Reclamation will conform to the Department's requirements described in 620 DM 7.
 - (2) **Reporting Fuels Management and Post-Fire Recovery Activities.** Reporting of fuels management and ES and BAR project accomplishments will be done using the National Fire Plan Operations and Reporting System (NFPORS).
- D. **Prescribed Fire Activities.** Only agencies, contractors, employees, or individuals meeting the Department's approved position qualifications will perform prescribed fire activities on Reclamation land. 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. These procedures are

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detailed in the NWCG Interagency Prescribed Fire Planning and Implementation Procedures Guide, PMS 484, and the NWCG Prescribed Fire Complexity Rating System Guide, PMS 424.

- (1) **Prescribed Fire Approval.** The Commissioner has final approval of burn plans and can delegate authority to a management level no lower than an area manager. All burn plans must be technically reviewed and approved by an individual qualified at the level of complexity for the planned burn. 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).
- (2) **Reporting Prescribed Fire.** Reporting of prescribed burn accomplishments will be done using NFPORS. Prescribed burns are reported as a sub-category of Fuels Reduction.
- E. Wildfire Response Strategies and Suppression. Reclamation will, with assistance from Regional Coordinators and local area and field office Wildland Fire Program positions, establish agreements or contracts with Federal agencies, non-Federal land management entities, or other wildland firefighting organizations for wildfire response strategies and suppression on Reclamation land.
- F. Integrated Pest Management and Invasive Species. Any activities using WFM to manage pest and/or invasive species should verify compliance with RM D&S, Integrated Pest Management and Invasive Species Program (ENV 01-01).
- 6. **Preparation of FMPs.** Each region will ensure FMPs are developed for all Reclamation jurisdictional land with burnable vegetation. For Reclamation land managed by a Federal or non-Federal managing partner, future management agreements or contracts must satisfy the FMP development requirement. If the partner previously developed an FMP, a Reclamation area manager will review, verify the plan satisfies D&S requirements, and adopt the plan. If the current management agreement does not require such action by the managing partner, then responsibility for the FMP development will remain with Reclamation until the new management agreement or contract is negotiated. At a minimum, FMPs will follow current Departmental guidance, including but not limited to:
 - A. Analyze and define how to manage WFM activities, including but not limited to fire management strategies, tactics, and alternatives.
 - B. Follow interagency guidelines for development and use of FMP templates and framework.
 - C. Coordinate collaboration with neighboring land management entities where the WFM Program crosses jurisdictional boundaries to implement and meet the FWFMP goals.

- D. Describe the wildfire suppression and management capabilities of responsible entities covered by the FMP to achieve objectives and meet National Wildlife Coordinating Group (NWCG) standards.
- E. Ensure all implementation of FMPs meets NEPA and NHPA requirements.
- F. Be developed concurrently with or based on a current and approved land use or resource management plan development process to protect values at risk and meet resource goals and objectives.
- G. Consider and coordinate with Standing Operating Procedures and Emergency Action Plans for applicable Reclamation facilities.
- 7. **Staffing.** Regional directors (RD) and managers will ensure staffing to implement an optimized WFM Program. This will require the designation of a Regional Coordinator position. Area managers may assign area and field office Wildland Fire Program staff positions to manage local WFM activities. Reclamation's National Wildland Fire Program Coordinator (National Coordinator) will ensure continued programmatic development of WFM activities and represent Reclamation on national interagency coordination teams.
 - A. Qualified Incident Response Personnel. The National Coordinator oversees wildland fire incident qualifications of personnel in the national Incident Qualifications and Certification System. Only agencies, contractors, employees, or individuals meeting the Department's approved position qualifications and standards are to provide wildfire incident response for Reclamation land. These qualifications are detailed in the *National Wildfire Coordinating Group (NWCG) Standards for Wildland Fire Position Qualifications*, PMS 310-1. Personnel qualification is based on Reclamation WFM Program administrative support, Reclamation need, and RD or area office recommendations. Reclamation personnel shall not participate in active fireline suppression operations. However, Grand Coulee Fire Department, a structural fire organization, may initially respond to wildfires as needed to protect infrastructure.
 - B. Incident Qualification Card (Red Card) Certification. Managers will provide staff with needed training and qualification development for obtaining and maintaining a valid Red Card. A Red Card shows the holder has completed all coursework and training and has experience required for a specific position. All Federal agencies require all personnel assigned to a wildland fire incident to have a Red Card, even if performing in a non-suppression position. The NWCG sets minimum training, experience, and physical fitness standards for wildland fire positions.
- 8. **Reimbursability.** Many of the costs associated with WFM activities are reimbursable. These costs are either reimbursed by Reclamation's Deputy Commissioner for Operations for activities conducted by other agencies or entities or are reimbursed by others if Reclamation conducts the WFM activities.

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- A. **Funding.** Funds for reimbursement of incurred WFM costs may come from several sources. The costs incurred by responding to and managing wildland fires will vary greatly depending on different variables and factors. Where practical, other sources of funds will be used in place of reimbursement for wildfire response and suppression costs (e.g., agreements with Office of Wildland Fire (OWF), other Federal agencies can respond and absorb the cost of a wildfire posing a threat to their land, or project beneficiaries may reimburse incurred costs). When other sources of funds are unavailable, managers will use regional or area office funds, and excess costs thereafter will be reported to the RD.
- B. WFM Costs Reimbursable by Reclamation. When other entities provide WFM services and support to Reclamation, it must be determined if these activities are reimbursable (e.g., a Federal or state agency responded to a wildfire on Reclamation land). Unless otherwise indicated by the Deputy Commissioner for Operations or RD, reimbursability will be determined by the area manager. During the determination process, project-specific legislation, Department and Reclamation policies, and existing cooperative agreements and contracts will be consulted. If the costs are determined to be reimbursable by Reclamation, reimbursement will be made in a timely manner.
- 9. **Wildland Fires Caused by Humans.** The determination of ignition being human caused results from a fire investigation report prepared by a trained fire investigator. Reclamation will determine whether to formally investigate for human involvement based on the responding agency's initial attack fire report. For each human-caused fire, where an identifiable individual, organization, or agency is determined to be responsible, RDs will determine if it is in the best interests of the United States to pursue recovery of damages and costs.

10. **Definitions.**

- A. Area and Field Office Wildland Fire Program Staff. Reclamation employee assigned by an area manager to serve as a point of contact for local wildland fire activities and projects in the geographical area of their associated area office or field office. Responsible for coordination with Regional Coordinator.
- B. **Burned Area Rehabilitation (BAR).** Efforts undertaken within five years of containment of a wildland fire to repair or improve fire-damaged land unlikely to recover naturally to management-approved conditions or to repair or replace minor facilities damaged by fire (620 DM 7).
- C. **Contract.** A mutually binding legal relationship obligating a buyer (Reclamation) to pay for supplies, services, or construction furnished by a seller (e.g., a non-Federal agency). The principal purpose of a contract is to acquire property or services for the direct benefit or use of the U.S. Government.

- D. Cooperative Agreements. 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" (RM D&S, Requirements for Award and Administration of Financial Assistance Agreements (Grants and Cooperative Agreements) (ACM 01-01)). Please note that "cooperative agreement" is also informally used to describe any collaborative agreement between wildfire suppression agencies.
- E. Emergency Stabilization (ES). Planned actions to stabilize and prevent unacceptable degradation to natural and cultural resources, to minimize threats to life and property resulting from the effects of a fire, or to repair/replace/construct physical improvements necessary to prevent degradation of land or resources. ES actions must be taken within one year following containment of a wildland fire (620 DM 7).
- F. **Fire Management Plan (FMP).** A plan that identifies and integrates all WFM and related activities within the context of approved land, resource, and facility operation and management plans. It defines a program to manage and implement WFM decisions assuring WFM goals and components are coordinated and approved by Reclamation land managers. The plan 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.
- G. **Fuels Management.** Act or practice of controlling flammability and reducing resistance to control of wildland fuels through mechanical, chemical, biological, or manual means or by fire, in support of land management objectives (NWCG, *Glossary of Wildland Fire*, PMS 205).
- H. **Incident Qualification Card (Red Card).** Documentation of an individual's current wildland fire qualifications.
- I. **Interagency Agreements.** Agreements with Federal agencies to acquire wildfire suppression and/or prescribed fire services for Reclamation.
- J. **Managing Partner.** An entity with whom Reclamation has entered into an agreement or contract to manage land and/or facilities under Reclamation's jurisdiction.
- K. National Fire Plan Operations and Reporting System (NFPORS). An interdepartmental, inter-agency automated data management and reporting system developed, operated, and maintained by the Department collaboratively with the Department of Agriculture. It is used for planning, managing, reporting, and tracking fuels reduction (including prescribed burns); post-wildfire recovery, including ES and BAR; and community assistance activities.

- L. **National Wildfire Coordinating Group (NWCG).** 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 to avoid wasteful duplication and 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.
- M. National Wildland Fire Program Coordinator (National Coordinator).

 Reclamation employee assigned by the Dam Safety and Infrastructure Director who provides Reclamation-wide WFM Program support, service, and policy direction.
- N. **Prescribed Fire.** A wildland fire originating from a planned ignition in accordance with applicable laws, policies, and regulations to meet specific objectives (Fire Management Board, *Updated Federal Wildland Fire Policy Terms and Definitions for the NWCG Glossary*, FMB Memorandum No. 19-004a).
- O. **Prescribed Fire Burn Plan (Burn Plan).** A plan required for each fire application ignited by management. 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). Plan content varies among the agencies (NWCG, *Glossary of Wildland Fire*, PMS 205).
- P. Regional Wildland Fire Program Coordinator (Regional Coordinator).

 Reclamation employee assigned by an RD to serve as the region's primary contact for the WFM Program. Plans, develops, designs, executes, and administers WFM programs and projects for Reclamation in their associated region.
- Q. **Suppression.** All the work to extinguish or limit wildland fire spread (NWCG, *Glossary of Wildland Fire*, PMS 205).
- R. **Wildfire.** A wildland fire originating from an unplanned ignition, such as lightning, volcanos, unauthorized and accidental human-caused fires, and prescribed fires that are declared wildfires (Fire Management Board, *Updated Federal Wildland Fire Policy Terms and Definitions for the NWCG Glossary*, FMB Memorandum No. 19-004a).
- S. **Wildfire Response Strategies.** The range of options available for response to a wildfire. 1) Common strategies include Monitor, Confine, Contain, Point/Zone Protection, Suppression, but hybrid and novel strategies may also be developed as the situation demands. 2) One or more strategies may be employed on any given wildfire. The strategy or strategies being employed may vary temporally or spatially (NWCG, *Glossary of Wildland Fire*, PMS 205).

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- T. **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 (NWCG, *Glossary of Wildland Fire*, PMS 205).
- U. Wildland Fire. Any non-structure fire that occurs in vegetation or natural fuels. Includes wildfires and prescribed fires (Fire Management Board, *Updated Federal Wildland Fire Policy Terms and Definitions for the NWCG Glossary*, FMB Memorandum No. 19-004a).
- V. Wildland Fire Executive Council (WFEC). A disbanded discretionary advisory committee, which provided advice and recommendations on national WFM, established under the authorities of the Secretary of the Interior and Secretary of Agriculture, in furtherance of 43 U.S.C. 1457 and provisions of the Fish and Wildlife Act of 1956 (16 U.S.C. 742a-742j), the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701 et seq.), the National Wildlife Refuge System Improvement Act of 1997 (16 U.S.C. 668dd-668ee), and the National Forest Management Act of 1976 (16 U.S.C. 1600 et seq.) (Department of the Interior and Department of Agriculture, Wildland Fire Executive Council Charter).
- W. Wildland Fire Management (WFM) Activities. Include, but are not limited to, fire management planning and strategies; wildfire education, preparedness, training, prevention, stabilization, and suppression programs; post-fire rehabilitation and restoration activities; prescribed fire activities; and fuels management.
- X. **Wildland Urban Interface.** The line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetation fuels (Fire Management Board, *Updated Federal Wildland Fire Policy Terms and Definitions for the NWCG Glossary*, FMB Memorandum No. 19-004a).
- 11. **Review Period.** The originating office will review this release every two years.