

Chapter 17

Prescribed Fire and Hazardous Fuels

The Service Fire Management Handbook incorporates, by reference, all guidance in the [Interagency Standards for Fire and Fire Aviation Operations](#) (Redbook, NFES #2724) Chapter 17 in addition to the following Service specific clarifications:

Prescribed Fire and Non-Fire Hazardous Fuels Projects

All FWS prescribed fires and non-fire hazardous fuels projects will be planned, implemented, and managed in accordance with all applicable policy, guidance, and standards (see http://www.nwcg.gov/branches/ppm/fpc/archives/fire_policy/index.htm) including:

- *Review and Update of the 1995 Federal Wildland Fire Management Policy January 2001*
- *Federal Wildland Fire Management Policy and Program Review, Final Report, December 18, 1995.*
- *National Interagency Mobilization Guide (NFES 2092).*
- *Prescribed Fire Complexity Rating System Guide (NWCG, NFES 2474, PMS 424).*
- *Prescribed Fire Smoke Management Guide (NWCG, NFES 1279, PMS 420-1).*
- *Guidance for Implementation of Federal Wildland Fire Policy (February 13, 2009).*
- *NWCG PMS 310-1 Wildland Fire and Prescribed Fire Qualifications System Guide.*
- *Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide (NWCG, PMS 484)*

All prescribed fires and non-fire hazardous fuels projects will be managed in adherence to the standards described in the [Interagency Standards for Fire and Fire Aviation Operations](#) and the guidance set forth in this Chapter.

Management

Prescribed Fire

Prescribed fires will be funded in accordance with guidance in the *FWS Fire Business Reference Guide*

The Division of Fish and Wildlife Management and Habitat Restoration has issued clarification regarding the management of prescribed fire within private lands programs. Additional direction regarding private lands burning can be found on SharePoint at: https://fishnet.fws.doi.net/regions/9/nwrs/fire/fuels/Shared%20Documents/Useful%20Docs%20for%20Fuels%20Mgt/fuels_treatment_on_private_land_faqs.pdf

Prescribed Fire and Non-Fire Hazardous Fuels

MOU's, agreements, cost shares or contracts must be in place prior to any on-the-ground implementation.

Planning

Prescribed Fire and Non-Fire Hazardous Fuels Projects

Hazardous fuels projects need a plan that addresses management treatment objectives. Plans should describe in clear, concise statements the specific measurable resource and hazardous fuels/fire objectives for treatment implementation. Objectives will be measurable and quantifiable so elements can be developed to meet those objectives and aid in determination of project success following implementation.

Hazardous fuels projects must be addressed in the applicable Fire Management Plan. In addition, fuels projects must go through the appropriate National Environmental Policy Act (NEPA) process, and meet other applicable requirements such as the National Historic Preservation Act (NHPA), and Endangered Species Act (ESA) analysis or justification (see Chapter 9 and 550 FW 3).

Fuels projects should - be planned on an interdisciplinary basis and be integrated as much as practicable with other resource management activities, and serve to implement the appropriate Comprehensive Conservation Plan (CCP).

Units will maintain a project file for each prescribed fire and non-fire hazardous fuels project. Project files will include:

- Original copy of the implementation plan along with any amendments, prescribed fire Go-No-Go checklists, and agency administrator ignition authorization.
- Environmental compliance documentation such as NEPA, ESA, and cultural clearances, etc.;
- Special documentation of planning requirements such as Wyden Amendment, MOU's, or Interagency Agreement references, landowner agreements, other private lands requirements, and any risk assessments and mitigation plans.
- List of persons contacted during the development and implementation of the plan including Fish and Wildlife Service personnel, other agency personnel, concessionaires, in-holders, special interest groups, refuge neighbors, concerned publics, etc. The date of contact and comments will be recorded as appropriate. Contact your local records management contact for any additional regional or local requirements.
- A short narrative of the results, including a critique of effectiveness, future recommendation(s), and lessons learned.
- All implementation documentation such as implementation organization charts, logs, Incident Action Plans, weather forecasts, weather observations, and fire behavior, and smoke dispersal observations.
- Final perimeter and/or treatment map

Prescribed Fire

Planned ignitions, including debris burning, must have an approved prescribed fire plan.

Prescribed fire plans shall be prepared and reviewed per Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide (Guide) requirements except that:

- Prescribed fire plans will identify the organization(s) (including qualifications and skill levels) that are required to safely implement the plan based upon the final prescribed

1 fire complexity analysis and a risk management assessment. Plans should identify
 2 minimum organizations for the various phases of implementation (blacklining, ground
 3 ignition, aerial ignition, holding, patrol).

- 4 • Prescribed fire plans may have multiple complexity analyses to address different stages
 5 of implementation (Burn Boss qualifications and/or organization’s). Refer to the Rx
 6 Guide for specific guidance.
- 7 • Programmatic Plans
 - 8 ▪ Low Complexity
 - 9 ○ Limited to where potential for escape is “negligible to nonexistent”
 - 10 ○ Limited to single complexity analysis
 - 11 ▪ Moderate/High Complexity
 - 12 ○ All ignition units site specific information must be included in the
 13 programmatic plan and go through technical review
- 14 • The final complexity rating is used as a basis for determining prescribed fire
 15 organization, Prescribed Fire Burn Boss level, and mitigation measures.

16
 17 The Service interprets low complexity prescribed fire plans to be limited to those with the
 18 possibility of spread or spotting outside the project area is negligible to nonexistent and that
 19 the potential for escape of a prescribed burn is low, as defined in the Prescribed Fire
 20 Complexity Rating System Guide.

21
 22 Prescribed fire plans will identify contingency resources (and required qualifications and
 23 fitness levels) and minimum response times for use if the fire exceeds prescription
 24 parameters and the capability of planned on-site holding forces. Please see reference guide
 25 for further information on contingency planning.

26
 27 In addition to the Guide and bureau requirements, regions and/or local units may have
 28 additional requirements for prescribed fire plans.

29
 30 During prescribed fire planning and operations, all federal agencies will accept each other’s
 31 standards for qualifications. The minimum qualifications standard is National Wildland Fire
 32 Coordinating Group (NWCG) Wildland and Prescribed Fire Qualifications System Guide,
 33 PMS 310-1.

34
 35 State, local cooperators and contractors working on federal agency prescribed fires must
 36 meet the NWCG PMS 310-1 standards unless local agreements and/or contracts specify
 37 otherwise.

38
 39 Prescribed fire plans will assess and mitigate potential smoke impacts, and be coordinated
 40 with appropriate air quality specialists and Federal, State, Tribal, air pollution control district
 41 or county regulatory authorities to ensure compliance with their regulations (see Chapter
 42 11).

43
 44 An agreement will be required when any non-Service lands are being considered for use as
 45 contingency.

46
 47 **Project Review and Approval**

48 **Prescribed Fire and Non-Fire Hazardous Fuels Projects**

49 Non-fire hazardous fuels treatment plans must have an agency administrator approval.
 50

1
2 Agency Administrators are responsible for ensuring hazardous fuels and prescribed fire
3 plans receive adequate review and are approved according to Service direction.
4

5 Agency Administrators may delegate authorities to an acting Agency Administrator after
6 considering the complexity of the project and the training, qualifications, experience, and
7 demonstrated ability of the individual.
8

9 The Agency Administrator is responsible for ensuring hazardous fuels projects are in
10 compliance with the CCP, FMP, and Regional Guidance.
11

12 **Prescribed Fire**

13 Prescribed fire plans must be technically reviewed and approved following the process
14 identified in the Guide before they can be implemented.
15

16 The Agency Administrator is responsible for the Pre-Ignition Approval Checklist for any
17 prescribed fire projects under their authority.
18

19 **Prescribed Fire Implementation**

20 Prescribed fires must meet Guide requirements.
21

22
23 Assigned staffing must meet qualification requirements and will be adequate to safely
24 implement the approved prescribed fire plan.
25

26 **Prescribed Fire during Geographical Area or National Preparedness Levels 4 and 5**

27 Approval is required for implementation of prescribed fire at Geographical Area or National
28 Preparedness Level 4. Follow guidance as described in National Mobilization Guide, Chapter
29 20, Administrative Procedures
30

31 Approval is required for implementation of prescribed fire at Geographical Area or National
32 Preparedness Level 5.

- 33 • Regional Chief’s, or if designated, RFMC’s or Regional fuels specialists, are
34 responsible for requesting concurrence for new prescribed fires when in National
35 Preparedness Level 5.
- 36 • Preparedness Level 5 Prescribed Fire Concurrence Form (Exhibit 17-1) must be
37 completed by the Region and faxed or emailed to Branch for concurrence.
- 38 • Branch will respond to request by fax or email
39

40 **After Action Reviews and Reporting**

41 An After Action Review (AAR) will be conducted upon completion of Hazardous fuels
42 projects and prescribed fires.
43

44 Prescribed fires and non-fire hazardous fuels treatments must be documented including:

- 45 • FMIS report entered into FMIS within 15 days of declared out date (prescribed fire) or
46 project completion (non-fire hazardous fuels treatments).
- 47 • Accomplishment report entered into NFPORS within 15 days (hazardous fuels projects
48 only) of declared out date (prescribed fire) or project completion (non-fire hazardous
49 fuels treatments).

- Non-NFP accomplishment (Non-HFR or Fire funding) must be entered summarized by state, by the NFPORS closing date, each FY. Guidance for these dates and data requirements are issued yearly in memorandum

Exhibit 17-1 National Preparedness Level 5 Concurrence Form

A fillable version is available in the Prescribed Fire folder on the Fire Management SharePoint site under Fuels, Fuels Shared Documents



United States Department of the Interior—U.S. Fish and Wildlife Service
National Preparedness Level 5 Prescribed Fire Concurrence Form

Regional Chiefs, or if designated, RFGCs, or Regional fuels specialists, are responsible for requesting Branch of Fire Management concurrence for new prescribed fires when in National Preparedness Level 5. Prior to forwarding the request for concurrence to NIFC, Fire Management Staff will review proposed prescribed fire plan to ensure they meet standards as set forth by agency policy, are at an acceptable risk, and a high priority for completion. Regional staff should evaluate the potential need of resources from outside the local unit for each proposed prescribed fire. It is advisable that Regional Fire Management Staff consult with their geographic area partners prior to forwarding the concurrence request.

Region
Date
Submitted By
Phone Number Office: Cell:

Describe Proposed Prescribed Fire:

Table with 8 columns: Station Name, Project Name, Lat/Long, Complexity, Acres, Primary Fuel Type, Start/End Date, Prescribed Fire Resources, Contingency Resources

Note: List each prescribed fire by name, start/end date identifies date of ignition and date anticipated to declare prescribed fire out. Enter engines, aviation resources, personnel, and crews required to implement the prescribed fire burn plan, including potential need for contingency split by type if applicable (i.e. contingency for ignition vs. holding, etc).

- Contingency resource availability has been confirmed with FMO: yes no
Contingency resources: on site off site both

Describe Current Conditions:

Note: include summary of potential risk of escape given current fuel conditions (ERC, BI, etc.), forecasted weather, and local or zone, and GACC preparedness level and status.

Rationale for needing to conduct prescribed fire under current National Preparedness Level V:

Regional Office Use Only:

Written Approval Given (whom) (datetime)

National Approving Official: Date:

August 2012

Wildfire Declaration

The 2014 Rx Guide states: A prescribed fire, or a portion or segment of a prescribed fire, must be declared a wildfire by those identified in the plan with the authority to do so, when either or both of the following criteria are met:

- *Prescription parameters are exceeded and holding and contingency actions cannot secure the fire by the end of the next burning period, or,*
- *The fire has spread outside the project area or is likely to do so, and the associated contingency actions have failed or are likely to fail and the fire cannot be contained by the end of the next burning period.*

NOTE: The Service identifies a wildland fire is either a prescribed fire or wildfire. A single fire cannot be both.

Service interprets a prescribed fire to be singular. Personnel cannot declare a portion or segment of the prescribed fire as a wildfire resulting in two separate fires.

Once a prescribed fire is declared a wildfire, it cannot be converted back to prescribed fire status.

Each type of wildland fire, wildfire or prescribed fire, is a singular event. Acres cannot be double counted in reporting databases.

The prescribed fire plan acres accomplished and meeting the objectives, as identified in the prescribed fire plan, during the prescribed fire is reported as prescribed fire acres.

The area that is declared a wildfire, even if still in the prescribed fire plan area, cannot be identified as a prescribed fire accomplishment. The wildfire area is identified and reported as wildfire acres.

Prescribed fires burning off Federal lands onto non-Federal lands without an existing agreement with the landowner(s) must be declared a wildfire immediately.

All escaped prescribed fires will be suppressed, in every instance, and will not be managed for resource benefits.

- Declared wildfires can be managed using confine and contain strategies.

Declared Wildfire (Escaped Prescribed Fire) Reviews

If a prescribed fire is declared a wildfire, the procedures described in the prescribed fire plan and Agency Administrator Ignition Authorization will be followed.

FMO will notify the RFMC and Agency Administrator will initiate a Declared Wildfire Review. Refer to the Interagency Prescribed Fire Planning and Implementation Procedures Guide for further guidance regarding Declared Wildfire Reviews.

- The appropriate level of review will be determined by the RFMC or designee.
- A copy of all Declared Wildfire Reviews will be sent to the Headquarters, Branch of Fire Management within 45 days of the fire being declared out.

If a significant event occurs other than a Declared Wildfire (deployment, entrapment, fatality, near miss, etc.) refer to [240 FW 7](#) for reporting and investigative requirements.

Hazardous Fuels Management Effectiveness Monitoring

It is appropriate to use Hazard Fuel Reduction Operations and Wildland/Urban Interface (work break down structure using an alpha code designator of W [WUI] or N [Non-WUI]) funding to facilitate adaptive management when evaluating fuels management program and

1 project effectiveness, and to ensure that refuge resource management goals and objectives
2 are not compromised by the hazardous fuels management projects. The use of Hazardous
3 Fuels Reduction (HFR) funds is limited to monitoring the first and second order effects of
4 fuel management projects (prescribed fires, mechanical or chemical fuel treatments, etc.) on
5 fuel and wildlife habitat composition and structure, as recognized and well-described as
6 measurable objectives in the approved refuge Fire Management Plan and/or an approved
7 refuge habitat management plan. Direction for monitoring the effects of climate change on
8 fire and fuels is not yet available. Legal issues and lack of standards preclude any
9 substantive Monitoring of the effects of climate change at this time.

10
11 Monitoring of specific resource protection objectives for values may be paid for by HFR
12 only until best management process and techniques can be established and proven
13 successful. It is suggested to limit this type of monitoring to those values that are most
14 important.

15
16 Although funding wildlife population inventories or fire effects research or management
17 studies on wildlife is not an appropriate use of Hazardous Fuels funds, evaluating fuel
18 management treatment effects on wildlife habitat composition and structure is intended to
19 complement these inventories, management studies and research projects.

20
21 Fuels management effectiveness monitoring requires the preparation and approval of a
22 monitoring plan. This plan can be a separate Fuels Treatment Monitoring Plan or part of a
23 holistic adaptive management program that integrates all refuge resource monitoring
24 activities. Whether separate or integrated the plan should contain:

- 25 • A full description of the fuel and wildlife habitat monitoring attributes, monitoring
26 objectives, approved monitoring protocol description in sufficient detail that a
27 successor can continue the monitoring, and the approved refuge Fire Management Plan
28 and/or habitat management plan reference identifying the monitoring need.
- 29 • Description of management actions to be taken when monitored habitat attributes reach
30 established threshold levels.
- 31 • The refuge's commitment to implementing and completing the monitoring and
32 management actions.

33
34 Regional Fire Management Coordinators will assure that before any fuel treatment
35 monitoring (beyond the first order fire effects monitoring in the Prescribed Fire Plan) is
36 approved for funding:

- 37 • The fuel and wildlife habitat monitoring activities are adequately described in the
38 approved refuge Fire Management Plan and/or an approved refuge Comprehensive
39 Conservation Plan or Habitat Management Plan.
- 40 • The monitoring protocols conform to regionally established fuel and wildlife habitat
41 monitoring protocols established under *Fulfilling the Promise* WH-10(1) action item or
42 the Service's Fuel and Fire Effects Monitoring Guide.
- 43 • The regional fire ecologist and/or wildlife biologist to determine if the proposed
44 protocols are the most cost effective and statistically defensible means of addressing
45 monitoring objectives independently review the plan.
- 46 • All stakeholders are aware of management changes that may result from the monitoring
47 results.

Guidance from the Division of Fish and Wildlife Management and Habitat Restoration**Prescribed Burning Off-Service Lands: Standards for alternative mechanisms of implementing prescribed burning activities through the Service's private lands programs.**

Use of Service personnel. Service personnel planning or implementing habitat restoration projects on off-Service lands, using prescribed burning, must be certified, and in compliance with all applicable departmental, Service, and regional fire management policies. The project must have an agreement signed by the landowner authorizing the use of prescribed fire on private land, and clearly stating the benefit to Federal Trust resources.

The person in charge of fire operations specifically must meet the Burn Boss certification requirements appropriate for the complexity level of the burn as derived from the National Wildfire Coordinating Group (NWCG) Prescribed Fire Complexity Rating System Guide. Based upon the outcome of the Complexity Analysis, the project officer qualifications (RXB1, RXB2, or RXB3) will be assigned to oversee the implementation of the project. The project must meet National Environmental Policy Act requirements prior to ignition (621FW 2, 4A(2)), and have all the necessary permits and approvals. All Service personnel participating in prescribed fires must meet the appropriate Service training and experience qualification requirements as detailed in the Fire Management Handbook. For all fire activities where the Service is involved a written prescribed fire plan must be prepared, reviewed, and approved according to Service and regional policies.

Service personnel may provide technical assistance regarding the ecological benefits of conducting a prescribed fire on a project. Non-NWCG certified personnel must clearly state that their recommendation for the use of fire is only to describe or project ecological improvements they are not certified to provide any recommendations regarding the actual design and implementation of the prescribed fire, nor will they participate in the operational aspects of the prescribed fire.

Use of certified agencies. Local, State, Tribal and other Federal agencies could be the partner actually planning and/or implementing the prescribed fire on private lands. The NWCG recognizes the ability of cooperating agencies at the local level to jointly define and accept each other's qualifications for prescribed fire. PMS 310-1 identifies the minimum qualification standards for interagency prescribed fire operations, unless otherwise specified in a local agreement. Departmental policy requires all Service personnel engaged in interagency operations to meet these standards.

In some limited cases, the Service could provide funds to non-certified agencies for the restoration and enhancement of Federal trust species habitats on private lands where prescribed burning may or may not be used as a management tool. In these cases, the Service will not have "substantial involvement" as defined in 31 U.S.C. 6301-6308. The only mechanism to transfer funds to non-certified agencies where prescribed fire may be used is a Grant Agreement. Grant Agreements with a non-certified state agency are for the purpose of general habitat restoration activities. The Service cannot identify or stipulate the techniques to be used for these habitat restoration projects. The task of identifying these techniques is a responsibility of the state agency. Other funding mechanisms such as Cooperative Agreements and Procurement Contracts require "substantial involvement" of Service personnel and should not be used with non-certified agencies.

1 Use of private cooperators. Private cooperators conducting a burn that is funded by Service
2 must be in compliance with NWCG, Service and regional policies regarding prescribed
3 burning. PMS 310-1 allows the establishment of standards to meet Service-specific needs
4 for operations that involve only Service personnel or, in some cases, local cooperators. A
5 written prescribed fire plan must be prepared, reviewed, and approved according to Service
6 and regional policies.

7
8 Hire private contractors certified by the Service. Private contractors who specialize in
9 providing fire management services must meet the NWCG standards contained within the
10 Wildland and Prescribed Fire Qualification Subsystem Guide, PMS 310-1, and meet any
11 other Service standards for qualifications and personal protective equipment (PPE). The
12 contract should specify these requirements as well as other regional and local standards or
13 work accomplishments they are to meet. There are vendors that are certified as meeting the
14 NWCG standards; however, the Service must still approve the burn plan. A written
15 prescribed fire plan must be prepared, reviewed, and approved according to local, Service
16 and regional policies.

17
18 Support only non-fire components. In the event one of the options above is not available,
19 the Service maintains the ability to only provide funding and/or technical assistance on the
20 non-fire components of the project. For example, the landowner is willing to implement a
21 project using prescribed burning without financial or technical assistance from the Service,
22 and the Service provides financial/technical assistance only to plant trees or conduct seeding
23 after the burn is complete. Service personnel may acknowledge the potential ecological
24 benefits of conducting a prescribed fire on a project, and that prescribed fire may be used to
25 complement activities funded by the Service, but the planning documents and agreements
26 must clearly state the limits of the Service's involvement, that the Service is not responsible
27 for the implementation of prescribed fire, that the decision to use prescribed fire is the
28 responsibility of the landowner, and that the Service is not certified to provide any technical
29 recommendations regarding the actual design or execution of a prescribed fire.

30
31 **2007 Amendment-Prescribed Burning off Service Lands: Standards for prescribed**
32 **burning activities under Service-administered grant agreements.**

33
34 When conducting prescribed burning off Service lands under a Service-administered grant
35 agreement, State fish and wildlife agencies: (a) must comply with existing State protocols
36 that include compliance with pertinent Federal, State, and local laws; and (b) do not have to
37 comply with any requirements of the Fish and Wildlife Service Fire Management Handbook
38 provided that the Service does not have "substantial involvement" in the project, as defined
39 in 31 USC 6301-6308. Therefore, if these requirements are met, State grantees under a
40 Service -administered grant agreement do not have to submit documentation under the grant
41 agreement to reflect compliance with requirements of the Fish and Wildlife Service Fire
42 Management Handbook.