

Chapter 17 Fuels Management

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 Fuels Management Projects

All FWS prescribed fires and fuels management projects will be planned, implemented, and managed in accordance with all applicable policy, guidance, and standards (see [Interagency Fire Planning Committee](#) including:

- *National Cohesive Wildland Fire Management Strategy*
- *Guidance for Implementation of Federal Wildland Fire Policy (February 13, 2009).*
- *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).*
- *National Incident Management System Wildland Fire Qualifications System Guide. (NWCG PMS 310-1).*
- *Prescribed Fire Complexity Rating System Guide (NWCG PMS 424, NFES 2474).*
- *Smoke Management Guide for Prescribed and Wildland Fire (NWCG PMS 420-2, NFES 1279).*
- *Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide (the Rx Guide)(NWCG PMS 484)*

All prescribed fires and fuels management 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 and fuels management will be funded in accordance with guidance in the most recent versions of the *FWS Fire Business Guide* and the *FWS Budget Allocation Handbook*.

Additional management direction and business rules can be found in the most recent versions of the Fuels Management Allocation and Accountability System (FAAS) and Fire Management Information System user guides.

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

3 4 **Planning**

5 6 **Prescribed Fire and Fuels Management Projects**

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

12
13 Fuels management treatments must be addressed in the applicable Fire Management Plan.
14 In addition, fuels projects must go through the appropriate NEPA process and meet other
15 applicable requirements (such as the NHPA, ESA, etc.) (see FMH Chapter 9 and
16 555FW3) analysis or justification (see Chapter 9 and 550 FW 3).

17
18 Fuels projects should 1) be planned on an interdisciplinary basis; 2) be integrated as
19 much as possible with other resource management activities; and 3) serve to implement
20 the appropriate Comprehensive Conservation Plan or other Land/Resource Management
21 Plan.

22 23 **Project File**

24 Units will maintain a project file for each prescribed fire and fuels management project.
25 Project files will include:

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

45 46 **Prescribed Fire**

1 Planned ignitions, including debris burning and “administrative units”, must have an
2 approved prescribed fire plan.

3
4 At a minimum, prescribed fire plans shall be prepared and reviewed per requirements in
5 the most recent version of the Rx Guide. FWS has additional requirements/guidance to
6 the Rx Guide that include:

- 7 • Prescribed fire plans will identify the organization(s) (including qualifications and
8 skill levels) that are required to safely implement the plan based upon the final
9 prescribed fire complexity analysis and a risk management assessment. Plans should
10 identify minimum organizations for the various phases of implementation
11 (blacklining, ground ignition, aerial ignition, holding, patrol).
- 12 • Prescribed fire plans may have multiple complexity analyses to address different
13 stages of implementation (Burn Boss qualifications and/or organization’s). Refer to
14 the Rx Guide for specific guidance.
- 15 • Programmatic Prescribed Fire Plans
 - 16 ▪ Low Complexity
 - 17 ○ Limited to where potential for escape is negligible to nonexistent
 - 18 ○ Limited to single complexity analysis
 - 19 ▪ Moderate/High Complexity
 - 20 ▪ All ignition units site specific information must be included in the
21 programmatic plan and go through technical review
- 22 • The final complexity rating is used as a basis for determining prescribed fire
23 organization, Prescribed Fire Burn Boss level, and mitigation measures.

24
25 The Service interprets low complexity prescribed fire plans to be limited to those with the
26 possibility of spread or spotting outside the project area is negligible to nonexistent and
27 that the potential for escape of a prescribed burn is low, as defined in the *Prescribed Fire*
28 *Complexity Rating System Guide (NWCG PMS 424, NFES 2474)*.

29
30 Prescribed fire plans will identify contingency resources (and required qualifications and
31 fitness levels) and minimum response times for use if the fire exceeds prescription
32 parameters and the capability of planned on-site holding forces. Please see the Rx Guide
33 for further information on contingency planning.

34
35 In addition to the Rx Guide and bureau requirements, regions and/or local units may have
36 additional requirements for prescribed fire plans.

37
38 During prescribed fire planning and operations, all federal agencies will accept each
39 other’s standards for qualifications. The minimum qualifications standard is *National*
40 *Incident Management Wildland Fire Qualifications System Guide (NWCG PMS 310-1)*
41 and/or the *Federal Wildland Fire Qualifications Supplement* – unless local agreements
42 specify otherwise.

43
44 State, local cooperators and contractors working on federal agency prescribed fires must
45 meet the minimum qualification requirements in the *National Incident Management*

1 *System Wildland Fire Qualifications Guide* (NWCG PMS 310-1) unless local agreements
2 and/or contracts specify otherwise.

3
4 Prescribed fire plans will assess and mitigate potential smoke impacts, and be
5 coordinated with appropriate air quality specialists and Federal, State, Tribal, air
6 pollution control district or county regulatory authorities to ensure compliance with their
7 regulations (see Chapter 11).

8
9 An agreement will be required when any non-Service lands are being considered for use
10 as contingency.

11 **Project Review and Approval**

12 **Prescribed Fire and Fuels Management Projects**

13
14 Fuels management plans must have an agency administrator approval.

15
16
17 Agency Administrators are responsible for ensuring fuels and prescribed fire plans
18 receive adequate review and are approved according to Service direction.

19
20 Agency Administrators may delegate authorities to an acting Agency Administrator after
21 considering the complexity of the project and the training, qualifications, experience, and
22 demonstrated ability of the individual.

23
24 The Agency Administrator is responsible for ensuring fuels projects are in compliance
25 with the CCP, FMP, and Regional Guidance.

26 **Prescribed Fire**

27
28 Prescribed fire plans must be technically reviewed and approved following the process
29 identified in the Rx Guide before they can be implemented.

30
31 The Agency Administrator is responsible for the Pre-Ignition Approval Checklist for any
32 prescribed fire projects under their authority.

33 **Prescribed Fire Implementation**

34
35
36 Prescribed fires must meet the Rx Guide requirements. Assigned staffing must meet
37 qualification requirements and will be adequate to safely implement the approved
38 prescribed fire plan.

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

40
41 In addition to information found in the Redbook Chapter 17, the following applies to
42 FWS when at National PL5.

- 43
44
 - Regional Chief's, or if designated, RFMC's or Regional fuels specialists are

45 responsible for requesting concurrence for new prescribed fires.

- The FWS Preparedness Level 5 Prescribed Fire Concurrence Form (Exhibit 17-1) must be completed by the Region and faxed or emailed to Branch for concurrence.
- Branch will respond to request by fax or email

Exhibit 17-1 National Preparedness Level 5 Concurrence Form
An MSWord 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, RFMC's, or Regional fuels specialists, are responsible for requesting Branch of Fire Management (BFM) concurrence for new prescribed fires when in National Preparedness Level 5. Prior to forwarding the request to BFM, Regional 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 and ensure that IA resources needs are met. 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:

Station Name	Project Name	Lat/Long	Complexity	Acres	Primary Fuel Type	Ignition Start/End Date	Prescribed Fire Resources (See Note)	Contingency Resources (See Note)

Note: List each prescribed fire by name, start/end date identifies date of ignition and date anticipated last date of anticipated of active fire activity (i.e. when will prescribed fire no longer require personnel to be on site). Enter engines, aviation resources, number of personnel, and crews required to implement the prescribed fire per approved fire plan; including identifying contingency resources, identify by agency type (i.e. federal, state, local VFD, etc.).

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

Describe current and expected conditions. Note: Include description of the potential risk of escape given fuel conditions (KBDI, ERC, BI, etc.) including the fuels outside of ignition unit, forecasted weather, Local Fire Danger Rating, IA coverage when personnel assigned to prescribed fire, other active prescribed fires, and other relevant information.

Rationale for needing to conduct prescribed fire under current National Preparedness Level 5:

Regional Office Use Only:

Written Approval Given/Denied	(whom/title)	(date/time)
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National Approving Official: _____ Date: _____

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Supporting Prescribed Fire Operations during National Preparedness Level 5
 Service personnel may participate in non-Service prescribed fire operations National PL5 without RFMC or National approval when:

- Participation is approved by their local unit, and
- Participation does not negatively impact local unit operations.
- At National PL 5, participation does not negatively impact resource availability for national priorities.

After Action Reviews and Reporting

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

Prescribed fires and fuels management treatments must be documented including:

- Treatment completion should be entered into Fire Management Information System (FMIS) within 15 days of declared out or completion.
- Accomplishment report entered into NFPORS within 15 days (fire-funded fuels projects only) of declared out date (prescribed fire) or project completion (fuels management treatments).
- Non-NFP accomplishment (Non-HFR or fire funded) activities such as habitat objective prescribed fires, mechanical treatments, forestry activities, etc., must be entered in FMIS by the annual memorandum reporting date.

Wildfire Declaration

The 2017 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.*

A prescribed fire can be declared a wildfire for reasons other than those identified above, if events cannot be mitigated as determined by the burn boss and agency administrator.

The Service identifies a wildland fire as either a prescribed fire or wildfire. A single fire cannot be both. Service interprets a prescribed fire to be singular and personnel can 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.

The prescribed fire plan acres accomplished and meeting the objectives, as identified in the prescribed fire plan, during the prescribed fire are 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. Acres cannot be double counted in reporting databases.

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 declared fires will be suppressed and will not be managed for resource benefits.

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

Declared Wildfire 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.

Zone FMO will notify the RFMC and Agency Administrator will initiate a Declared Wildfire Review. Refer to the Rx Guide for further guidance regarding Declared Wildfire Reviews.

- The appropriate level of review will be determined by the appropriate agency administrator in coordination with the RFMC or designee.
- A copy of all Declared Wildfire Reviews in the approved format will be sent to the Headquarters, Branch of Fire Management within 45 days of the fire being declared out.
- The National Fuels Specialist will submit the final report to the Wildland Fire Lessons Learned Center once approved by the Chief, Branch of Fire Management.

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.

Fuels Management Monitoring

It is appropriate to use Fuels Management (FM) funding (utilizing a work break down structure using an alpha code designator of W [WUI] or N [Non-WUI]) to facilitate adaptive management when evaluating fuels management program and project effectiveness, and to ensure that refuge resource management goals and objectives are not compromised by the fuels management projects. The use of FM funds is limited to monitoring the first and second order effects of fuel management projects/treatments (prescribed fires and non-fire) on fuel and wildlife habitat composition and structure, as recognized and well-described as measurable objectives in the approved refuge Fire Management Plan and/or an approved Habitat Management Plan.

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

Although funding wildlife population inventories or fire effects research or management studies on wildlife is not an appropriate use of FM funds, evaluating fuel management projects/treatment effects on wildlife habitat composition and structure is intended to complement these inventories, management studies and research projects.

Fuels management effectiveness monitoring requires an approved monitoring plan. This plan can be a separate Fuels Treatment Monitoring Plan or part of a holistic adaptive management program that integrates all refuge resource monitoring activities. Whether separate or integrated the plan should contain:

- 1 • A full description of the fuel and wildlife habitat monitoring attributes, monitoring
2 objectives, approved monitoring protocol description in sufficient detail that a
3 successor can continue the monitoring, and the approved refuge Fire Management
4 Plan and/or Habitat Management Plan reference identifying the monitoring need.
- 5 • Description of management actions to be taken when monitored habitat attributes
6 reach established threshold levels.
- 7 • The refuge's commitment to implementing and completing the monitoring and
8 management actions.

9
10 Regional Fire Management Coordinators will assure that before any fuel
11 project/treatment monitoring (beyond the first order fire effects monitoring in the
12 Prescribed Fire Plan) is approved for funding:

- 13 • The fuel and wildlife habitat monitoring activities are adequately described in the
14 approved Fire Management Plan and/or an approved Comprehensive Conservation
15 Plan or Habitat Management Plan.
- 16 • The monitoring protocols conform to regionally established fuel and wildlife habitat
17 monitoring protocols established under *Fulfilling the Promise* WH-10(1) action item
18 or the Service's *Fuel and Fire Effects Monitoring Guide*.
- 19 • The regional fire ecologist and/or wildlife biologist will determine if the proposed
20 protocols are the most cost effective and statistically defensible means of addressing
21 monitoring objectives and will independently review the plan.
- 22 • All stakeholders are aware of management changes that may result from the
23 monitoring results.

24
25 **Prescribed Burning Off-Service Lands: Standards for alternate**
26 **mechanisms of implementing prescribed burning activities through the**
27 **Service's private lands programs.**

28
29 Use of Service personnel. Service personnel planning or implementing habitat
30 restoration projects on off-Service lands, using prescribed burning, must be certified, and
31 in compliance with all applicable departmental, Service, and regional fire management
32 policies. The project must have an agreement signed by the landowner authorizing the
33 use of prescribed fire on private land, and clearly stating the benefit to Federal Trust
34 resources.

35
36 The person in charge of fire operations specifically must meet the Burn Boss certification
37 requirements appropriate for the complexity level of the burn as derived from the NWCG
38 *Prescribed Fire Complexity Rating System Guide*. Based upon the outcome of the
39 Complexity Analysis, the project officer qualifications (RXB1, RXB2, or RXB3) will be
40 assigned to oversee the implementation of the project. The project must meet NEPA
41 requirements prior to ignition (621 FW 2, 4A(2)), and have all the necessary permits and
42 approvals. All Service personnel participating in prescribed fires must meet the
43 appropriate Service training and experience qualification requirements as detailed in the
44 Fire Management Handbook. For all fire activities where the Service is involved a
45 written prescribed fire plan must be prepared, reviewed, and approved according to
46 Service and regional policies.

1
2 Service personnel may provide technical assistance regarding the ecological benefits of
3 conducting a prescribed fire on a project. Non-NWCG certified personnel must clearly
4 state that their recommendation for the use of fire is only to describe or project ecological
5 improvements they are not certified to provide any recommendations regarding the actual
6 design and implementation of the prescribed fire, nor will they participate in the
7 operational aspects of the prescribed fire.

8
9 Use of certified agencies. Local, State, Tribal and other Federal agencies could be the
10 partner actually planning and/or implementing the prescribed fire on private lands. The
11 NWCG recognizes the ability of cooperating agencies at the local level to jointly define
12 and accept each other's qualifications for prescribed fire. NWCG PMS 310-1 identifies
13 the minimum qualification standards for interagency prescribed fire operations, unless
14 otherwise specified in a local agreement. Departmental policy requires all Service
15 personnel engaged in interagency operations to meet these standards.

16
17 In some limited cases, the Service could provide funds to non-certified agencies for the
18 restoration and enhancement of Federal trust species habitats on private lands where
19 prescribed burning may or may not be used as a management tool. In these cases, the
20 Service will not have "substantial involvement" as defined in 31 U.S.C. 6301-6308. The
21 only mechanism to transfer funds to non-certified agencies where prescribed fire may be
22 used is a Grant Agreement. Grant Agreements with a non-certified state agency are for
23 the purpose of general habitat restoration activities. The Service cannot identify or
24 stipulate the techniques to be used for these habitat restoration projects. The task of
25 identifying these techniques is a responsibility of the state agency. Other funding
26 mechanisms such as Cooperative Agreements and Procurement Contracts require
27 "substantial involvement" of Service personnel and should not be used with non-certified
28 agencies.

29
30 Use of private cooperators. Private cooperators conducting a burn that is funded by
31 Service must be in compliance with NWCG, Service and regional policies regarding
32 prescribed burning. PMS 310-1 allows the establishment of standards to meet Service-
33 specific needs for operations that involve only Service personnel or, in some cases, local
34 cooperators. A written prescribed fire plan must be prepared, reviewed, and approved
35 according to Service and regional policies. Private contractors who specialize in
36 providing fire management services must meet the NWCG standards contained within the
37 Wildland and Prescribed Fire Qualification Subsystem Guide, PMS 310-1, and meet any
38 other Service standards for qualifications and personal protective equipment (PPE). The
39 contract should specify these requirements as well as other regional and local standards
40 or work accomplishments they are to meet. There are vendors that are certified as
41 meeting the NWCG standards; however, the Service must still approve the burn plan. A
42 written prescribed fire plan must be prepared, reviewed, and approved according to local,
43 Service and regional policies.

44
45 Support only non-fire components. In the event one of the options above is not available,
46 the Service maintains the ability to only provide funding and/or technical assistance on

1 the non-fire components of the project. For example, the landowner is willing to
2 implement a project using prescribed burning without financial or technical assistance
3 from the Service, and the Service provides financial/technical assistance only to plant
4 trees or conduct seeding after the burn is complete. Service personnel may acknowledge
5 the potential ecological benefits of conducting a prescribed fire on a project, and that
6 prescribed fire may be used to complement activities funded by the Service, but the
7 planning documents and agreements must clearly state the limits of the Service's
8 involvement, that the Service is not responsible for the implementation of prescribed fire,
9 that the decision to use prescribed fire is the responsibility of the landowner, and that the
10 Service is not certified to provide any technical recommendations regarding the actual
11 design or execution of a prescribed fire.

12
13 **2007 Amendment-Prescribed Burning off Service Lands: Standards for prescribed**
14 **burning activities under Service-administered grant agreements.**

15
16 When conducting prescribed burning off Service lands under a Service-administered
17 grant agreement, State fish and wildlife agencies: (a) must comply with existing State
18 protocols that include compliance with pertinent Federal, State, and local laws; and (b) do
19 not have to comply with any requirements of the Fish and Wildlife Service Fire
20 Management Handbook provided that the Service does not have "substantial
21 involvement" in the project, as defined in 31 USC 6301-6308. Therefore, if these
22 requirements are met, State grantees under a Service -administered grant agreement do
23 not have to submit documentation under the grant agreement to reflect compliance with
24 requirements of the Fish and Wildlife Service Fire Management Handbook.
25