



# United States Department of the Interior

NATIONAL PARK SERVICE

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**May 23, 2011**

Memorandum

To: Regional Directors  
Attn: Park Superintendents

From: Associate Director, Visitor and Resource Protection /s/ **Stephen J. Shackelton**

Subject: 2011 Direction to NPS Leaders – Federal Wildland Fire and Fire Aviation Programs

With the coming of the summer fire season, there are several items concerning our wildland fire program I would like to bring to your attention. This information will assist you in understanding the direction of the fire, and its affiliated aviation programs, which look to you for leadership.

### ***Five National Interagency Communication Themes***

NIFC External Affairs has produced five key national themes to communicate during the 2011 fire season:

1. Safety of the public and firefighters is the top consideration in fire and aviation management.
2. Firefighters count on you to do your part.
3. Fires are managed in different ways.
4. Fire seasons are expected to become longer and more difficult.
5. Teamwork is essential in wildland fire.

More information on the five national fire themes can be found at:

<http://www.nifc.gov/index.html>

### **Several issues to focus on specific to the National Park Service:**

#### ***Safety is our Number 1 Priority.***

The first Guiding Principle of the Federal Wildland Fire Policy is “Firefighter and public safety is the first priority in every fire management activity.” When a decision is made to engage in any fire management activity, employees are exposed to hazards. Appropriate hazard assessment and risk mitigation is a critical step before undertaking any wildland fire action. Pre-planning to deal with injuries incurred during wildland fire actions, by providing qualified and appropriate supervision and preparing employees to conduct medical evacuation operations, is crucial. On June 12, 2010, the Associate Director for Visitor and Resource Protection issued a memo with the subject line “National Park Service Direction on NWCG #025-2010 Memorandum.” The information contained in that memo remains valid and should be reviewed by all NPS employees with fire management responsibilities or duties.

Local units can plan and train for medical emergencies which may occur during fires as incidents within an incident. Identifying options and planning for medical evacuation of seriously injured employees ahead of time should go beyond reliance on helicopter transport. Part of this preplanning should include providing the basic skills and necessary equipment for the use of identified options. Preplanning should also include expectations of incoming Incident Management Teams as put forth in delegations of authority, as well as ensuring the sharing of identified options for medical evacuations to meet those expectations.

### ***Mutual Expectations***

It is critical that local cooperators have an understanding of how fires are to be managed within NPS boundaries. NPS discussions with local cooperators should occur pre-season, and discussions should seek to clarify objectives, define operational strategies and tactical measures, cover how fire will be managed across jurisdiction boundaries, and establish cost-share expectations for all mutual response areas and cross jurisdiction fires. Protection of private land values must be considered in the development of plans in support of unit land and fire management objectives. Local agreements and Annual Operating Plans should be clear on the objectives, strategies, and tactics the NPS will employ.

### ***Preparedness Reviews***

Each park with a fire management program must conduct an annual Preparedness Review prior to the fire season. The purpose of the annual review is to help the field units prepare for the fire season, identify operational, procedural, personnel, or equipment deficiencies, and recommend corrective actions. Modules will not take out-of-park fire assignments until the review for their module is completed. Further guidance on these reviews can be found in the *2011 Interagency Standards for Fire and Fire Aviation Operations*, Chapter 18-2 and in Reference Manual 18 – Wildland Fire Management (RM18), Chapter 17-4. Preparedness review checklists can be downloaded at: [http://www.nifc.gov/policies/preparedness\\_reviews/checklists.htm](http://www.nifc.gov/policies/preparedness_reviews/checklists.htm)

As part of preparation for the upcoming season, each Fire Management Plan must be reviewed for currency and updated as needed per instructions found in RM18, Chapter 4. All parks with Fire Management Plans should also ensure that they have completed the consistency check with updates to wildland fire policy as required by the May 11, 2009 memo, titled “Annual Review Process for Fire Management Plans.”

(<http://npsfamshare/wildlandfire/budgetandplanning/firemanagementplanning/Shared%20Documents/2009%20memo%20-%20annual%20review%20process.docx>)

### ***Cost Effective Fire Operations***

Maximizing the cost effectiveness of any fire operation is the responsibility of all involved, including those that authorize, direct, or implement those operations. Cost effectiveness is the most economical use of the wildland fire resources necessary to accomplish mission objectives. Accomplishing fire operations objectives safely and efficiently will not be sacrificed for the sole purpose of “cost savings.” Care will be taken to ensure that suppression expenditures are commensurate with values to be protected, while understanding that other factors may influence spending decisions, including the social, political, economic, and biophysical environments.

### ***Burned Area Emergency Rehabilitation***

Park superintendents, fire management officers, and incident commanders must consider post-fire rehabilitation costs when determining response to wildland fires. The Department of the Interior (DOI) is implementing cost containment measures for post-fire activities, which will mean that not every emergency stabilization or burned area rehabilitation activity will be funded.

Consequently, fire stabilization and burned area rehabilitation activities must be prioritized and the measures of most importance forwarded for approval.

### **WFDSS**

The NPS adopted the Wildland Fire Decision Support System (WFDSS) as the sole wildland fire decision support system and decision documentation tool on April 30, 2010. Every NPS wildfire will be entered into WFDSS, including “natural outs” and fires that were reported to the responsible NPS unit after being extinguished by another agency.

Every wildfire decision will consider the development of protection objectives which also provide for safety of firefighters and the public and minimize the loss of, and damage to, property, cultural resources, and natural resources.

Wildfires burning on to NPS lands from another federal fire management agency (Forest Service, Bureau of Land Management, Bureau of Indian Affairs, or Fish & Wildlife Service) should be entered by the originating agency, not the NPS. Wildfires burning on to NPS lands from state and local lands will be entered into WFDSS by the receiving NPS unit, if they have not been entered by another federal agency or state.

Wildfires must be entered individually, not as complexes, into the WFDSS. This single entry is independent of the operational or financial management of a group of fires as a complex, and regardless of complexes having a common course of action. Applicable fire-related resource management objectives and management requirements from the park's Fire Management Plan (FMP) will be migrated into the WFDSS. This information will reflect the management objectives for wildland fire as stated in the park's FMP and supporting NEPA documents.

WFDSS does not replace ICS-209, Wildland Fire Management Information (WFMI) system, and Situation Reporting systems. Parks will continue to follow National, Geographic Area Coordination Center (GACC), and/or local guidance for fire reporting within these systems.

### ***WFDSS Published Decisions, Approval and Cost Certification***

Chapter 11 of the *Interagency Standards for Fire and Fire Aviation Operations, 2011* (“Redbook”) addresses when to publish a decision in WFDSS and WFDSS approval and cost certification. Costs are those estimated in the decision process for management of the fire across all jurisdictions and agencies until declared out and will include suppression damage repair, burned area emergency stabilization, and reviews:

- *Redbook, Chapter 11, Pages 11-12: “All fires that escape initial attack or exceed initial response will have a published decision within WFDSS. A published WFDSS decision establishes a course of action and rationale for incidents with varying duration, spread potential, costs, or other considerations. Consider publishing a decision when a fire continues to actively spread beyond a few burning periods, increases in complexity or cost, or has a high relative risk. The level of documentation to publish a decision should be commensurate to the incident duration, spread potential, cost, or relative risk.”*
- Redbook, Chapter 11, Pages 13-14: Park Superintendents will approve all WFDSS decisions. Superintendents will certify fire costs under \$2 million, NPS Regional Directors will certify fire costs between \$2 million and \$5 million, and all fires with estimated costs exceeding \$5 million must be certified by the NPS Director. The *Certification Form for Wildland Fire Decision Support System (WFDSS) Decisions* to be used by Regional Directors and the

Director can be found on the NPS Wildland Fire Sharepoint site:

<http://npsfamshare/wildlandfire/default.aspx>

### ***Collection of Wildfire Point of Origin and Fire Perimeter Spatial Data***

The need for accurate and timely data continues to be crucial to determine each Agency's success in achieving its wildland fire goals and objectives, as well as its use for wildland fire planning, information reporting, budget formulation, and risk analysis. The Point of Origin of a wildfire must be entered into both the NPS WFMI and WFDSS. RM18, posted at [http://www.nps.gov/fire/download/fir\\_wil\\_rm18.pdf](http://www.nps.gov/fire/download/fir_wil_rm18.pdf), Chapters 11 and 20 (section 6.3.1), specifically address wildland fire reporting and the importance of accurate data. RM18 is being updated and will provide new guidance for collection of NPS wildland fire spatial data.

When a fire is declared out, each unit should upload final fire perimeters into WFDSS, as noted in RM18, whether the fire burned on to or off of NPS lands. The final fire perimeter is the entire fire perimeter regardless of whether the fire burned on to or off of NPS lands.

### ***Incident Complexity Analysis/Organizational Needs Assessment***

Incident Complexity determination is in transition from what we have been doing (Redbook Wildland Fire Complexity Appendices F & G) to a new *Organizational Needs Assessment*, referenced in the NWCG Memorandum NWCG #042-2010. This *Organizational Needs Assessment* will be in WFDSS release 3.14 (estimated to be at the beginning of May 2011).

For 2011, based on wording in the Redbook and the *Organizational Needs Assessment*, the *Organizational Needs Assessment* should be used for Type 1, 2, & 3 incidents, and the Redbook analysis can be used for all wildfires (Type 5, 4, 3, 2, 1). A park may use the results of whichever analysis they believe, based on their local knowledge, is the one that best portrays the complexity of the incident.

### ***Working within Fireline Qualifications***

All personnel engaged in wildland fire duties (planned and unplanned actions) must be qualified based on qualifications identified in the current edition of *Wildland Fire Qualification System Guide*, PMS 310-1. On wildland fire incidents, trainees may supervise other trainees. However, when assigning trainees to positions where critical life-safety decisions occur, trainees must be directly supervised (readily available for consultation and direction) by a fully qualified individual. The intent of this guidance is to focus fully qualified supervision where exposure to hazard and risk is greatest.

There is no policy on how many trainees a trainer can manage, or on the use of trainees in complex situations, because each situation is unique. RM18, Chapter 10, states that an "employee must experience at least two qualified assignments in a position before becoming a position performance evaluator."

### ***Vehicle Readiness and Operational Safety***

Wildland Fire Fleet daily preventative maintenance checks, regular servicing, and prompt repairs are critical to providing mission readiness, proper performance, and compliance with safety checks. Wildland fire vehicles that are not operationally sound or have safety deficiencies must not be put into service. In addition, vehicles that suffer from mechanical or safety issues while in route or on assignment must be taken out of service at the earliest opportunity in which it is safe to do so and must not be put back into service until corrective action has been completed.

Park units will ensure that all wildland fire vehicle electrical modifications and/or repairs, including the installation of aftermarket devices, be conducted by a licensed vehicle electrician, with an emphasis on ensuring the ability to withstand rigorous travel conditions, both on- and off-road, within design limitations of the vehicle. Also, fuel containers should be stored properly in separate compartments from fuses or other ignition devices.

**Engines** are required to be weighed annually and the certified weight slips kept in the vehicle. A copy will be sent to the Fire Management Program Center (FMPC). (Reference Ch.14-02 of the *2011 Interagency Standards for Fire and Fire Aviation Operations*.) ([http://www.nifc.gov/policies/red\\_book.htm](http://www.nifc.gov/policies/red_book.htm))

Vehicles that are in excess of 26,000 lbs GVWR require the driver to possess a valid state CDL (Commercial Driver's License). Additional important details are included in the referenced section. (Reference Ch.07-06 of the *2011 Interagency Standards for Fire and Fire Aviation Operations*.) ([http://www.nifc.gov/policies/red\\_book.htm](http://www.nifc.gov/policies/red_book.htm))

### ***Budget***

Finally, it should be noted that the DOI wildland fire budget, and the fuels portion in particular, is not immune from the uncertainty surrounding the federal budget environment. DOI 2011 direction focuses the fuels budget in the wildland urban interface for community protection. In addition, the DOI allocation patterns for both NPS project and programmatic staff funding is changing due to implementation of the Hazardous Fuels Prioritization and Allocation System (HFPAS). Parks are reminded that DOI wildland fire funds have always been intended as supplemental funds in support of ONPS funding for the NPS wildland fire program. Future implementation of NPS non-wildland urban interface fuels treatment projects will likely require supplemental allocation of ONPS funds, along with DOI wildland fire funds. NPS aviation programs are also expected to be similarly affected by reduced support from DOI wildland fire funds.

For further information, contact your regional fire management officer; Bill Kaage, Branch Chief for Wildland Fire, at 208-387-5225; or Dan Buckley, National Fire Operations Program Leader, at 208-387-5174.

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