

United States Department of the Interior

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EMS Transmission 03/05/2019 Instruction Memorandum No. UT IM-2019-006 Expires: 03/01/2021

To: District Managers, Monument Manager, Field Managers, Fire Management Officers, and Fuels Management Specialists

From: State Director

Subject: Utah Prescribed Fire Policy

Program Area: Prescribed Fire and Fuels Management

Purpose: One of the most significant decisions an agency administrator can make is that of putting wildland fire back on the landscape. This Instruction Memorandum provides prescribed fire policy direction specific to Utah Bureau of Land Management (BLM) and supplements the Interagency Prescribed Fire Planning and Implementation Procedures Guide (PMS 484 – July 2017 Prescribed Fire Guide), the Bureau of Land Management's National Direction (FA IM-2017-035), and H-9214-1 Fuels Management and Community Assistance Handbook.

Administrative or Mission Related: This IM is or directly related to the BLM mission.

Policy/Action:

District Manager and Field Manager Expectations

District/Monument Managers (DM), Field Managers (FM) and Fire Management Officers (FMO) are expected to be actively involved in the planning, review, approval, and implementation of prescribed fire projects. Only DMs or designated acting's who meet the Agency Administrator requirements as outlined in the *Interagency Standards for Fire and Fire Aviation Operations* (Red Book) and Fire Training Requirements for Bureau of Land Management Agency Administrators (FA IM-2018-003) are delegated the authority from the State Director to approve prescribed fire plans as outlined in the BLM Utah 1203 State supplement. The DM must also approve the Complexity Analysis and the Agency Administrator Ignition Authorization, assurance of the plan's currency and meeting interagency and BLM

standards should occur prior to authorizing implementation. The DMs, their potential designated acting's, and FMs are to review the Prescribed Fire Guide, paying particular attention to the section on responsibilities. The DM which has responsibility for the Field Office is delegated the authority to approve prescribed fire plans. In cases where the DM does not meet the above requirements, the State FMO can approve the plan. The FMs should review plans prior to approval by the DM ensuring resource and prescribed fire objectives meet resource management plan objectives and the National Environmental Policy Act (NEPA) provisions.

Prescribed Fire Plan Technical Reviews

Final technical reviews of all moderate to high complexity prescribed fire plans must be completed by the State Fuels Management Specialist (SFMS), or delegated to fully qualified personnel by the SFMS to perform the technical review, prior to approval by the DM. Low complexity prescribed fire plans can have a peer technical review by another BLM prescribed fire burn boss (Type II or I). The prescribed fire burn boss conducting the technical review must be from another District and cannot be involved in plan preparation. All prescribed fire plans must utilize the most current Utah/Intermountain Interagency Prescribed Fire Plan Template located at the Utah BLM fuels management program SharePoint site: https://blmspace.blm.doi.net/ut/fuelsspec/default.aspx. Low complexity burns must use this template with the detail of the plan commensurate with the scope of the project, addressing pertinent elements in the plan.

Technical reviews of prescribed fire plans can take six months or longer and depends upon the complexity of the plan and condition of the submitted plan. An on-site review of Wildland Urban Interface (WUI) or high complexity situations is required by the technical reviewer. Coordination with the SFMS during the planning process is encouraged to help facilitate the development of a quality plan that complies with all relevant guidance. Plans not in conformance with the format and/or BLM minimum standards may require additional review time with subsequent corrections and resubmission for additional technical review. Plans submitted for final review must include all preparers and reviewers signatures, all elements and attachments required in the Prescribed Fire Guide and FA IM-2017-035, along with a digital copy in Microsoft Word placed on the SharePoint site. Those plans requiring corrections or additions will be placed back on the SharePoint site and use the track changes feature in MS Word to document revisions. All prescribed fire plans with an aerial operation including ignition will provide a Project Aviation Safety Plan (PASP) with applicable information and complexity analysis completed. The State Aviation Manager will complete the technical review of the PASP.

Prescribed Fire Plan Preparation

The primarily prescribed fire plan preparer must be qualified or previously qualified as a prescribed fire burn boss at or above the level of project complexity. The prescribed fire plan preparer is defined as the individual responsible for the preparation of the prescribed fire plan. Several people may be involved in the preparation of the prescribed fire plan, but the prescribed fire plan preparer is responsible for the final plan content. Prescribed fire burn boss trainees must complete a prescribed fire plan as an additional preparer before being qualified as a prescribed fire burn boss at the appropriate level as required in the prescribed fire burn boss position task book. The local Fuels Management Specialist should review all prescribed fire

plans prior to submission to the SFMS for final technical review. Any technical changes occurring between the technical review and approval requires resubmission to the SFMS for a review of the plan. A scanned copy of the approved cover page with all signatures must be posted on the Utah BLM fuels management SharePoint site following approval.

Go-No-Go Checklists

The FMO or acting will be involved with the review of the Go-No-Go Checklist. Involvement of the FMO may include on-site review, communications via phone or radio, and/or discussion prior to implementation. The Go-No-Go Checklist will be complete and signed by the prescribed fire burn boss with the concurrence of the ignition specialist and holding specialist functions prior to ignition and retained as part of the project file. The Go-No-Go Checklist will be completed each day of active ignition.

Complexity Analysis

Workforce and equipment must be considered in identifying the complexity of the prescribed fire plan. The qualifications for both the holding and ignition specialist functions should be commensurate with the complexity of the project. For the ignition specialist function on highly complex operations, a prescribed fire burn boss T2 and/or division supervisor with firing boss (FIRB) qualifications must be used. Should a wildfire be declared, the prescribed fire burn boss will become the incident commander at the appropriate level until relieved or replaced. The prescribed fire burn boss should be qualified to preform appropriate level (i.e., RXB3 = ICT5, RXB2 = ICT4, RXB1 = ICT3).

Notifications

For all high to moderate complexity burns, the SFMS and/or SFMO will be notified prior to ignition by the fuels management specialist or prescribed fire burn boss that the prescribed fire will be implemented. Any incidents occurring on a prescribed burn that is likely to come to the attention of the Washington or Utah State Office (i.e., accidents, contingency actions taken, public complaints, negative media attention, etc.) must be reported to the SFMS and/or SFMO. Planned burn information will be posted on www.utahfireinfo.gov, and the Great Basin Coordination Center (GBCC) Planned Prescribed Fire Report one week to 72 hours prior to the planned ignition. Adjacent and potentially affected landowners will be included in the Notification Plan and contacted of planned prescribed fire activities. Wildland fire that may cross onto these lands will require a formal agreement as to how these activities may affect their lands and determine an acceptable response.

Smoke Management

In accordance with the Utah Smoke Management Plan, land managers are required to submit the Pre-Burn Information (Form 3) in addition to the prescribed fire plan to the Utah Smoke Program Coordinator for evaluation by the Director of the Utah Division of Air Quality two weeks prior to any ignition. The plan and associated smoke management maps can be uploaded to the Utah Smoke Management System website at https://smokemgt.utah.gov/ or emailed directly to the Smoke Program Coordinator. Land Managers are required to submit the Burn Request (Form 4) to the Smoke Program Coordinator for approval by the Director of the Utah Division of Air Quality two business days prior to ignition of prescribed fires requiring prescribed fire plans. The burn request will be submitted using the Utah Smoke Management System website. Smoke

complaints must be communicated to the Smoke Program Coordinator, who will track them according to the Utah Smoke Management Plan.

Personal Protective Equipment

Prescribed fire operations within Utah can occur outside of normal wildfire conditions and under adverse weather conditions of cold temperatures, rain, and/or snow. Personal Protective Equipment (PPE) exemptions to the Red Book requirements for prescribed fire operations are allowed under such conditions and based upon the risk assessment. Such exemption may include requirements for the use of fire shelters, flame resistant shirts and trousers, and wildland fire boots.

Timeframe: This IM is effective upon receipt.

Budget Impact: There is minimal budget impact from this IM.

Background: In accordance with national direction, BLM Utah State and District/Field Offices may choose to implement stricter standards or additions above those identified in the Prescribed Fire Guide and the additional BLM requirements identified in FA IM-2017-035.

Manual/Handbook Sections/Directives Affected: Instruction Memorandum No. UT 2015-035 is replaced through the issuance of the directive.

Coordination: This IM has been coordinated with BLM Utah District Fire Management Officers and Fuels Specialists along with the Utah Leadership Team and Utah Leadership Council.

Contact: Any questions regarding this policy should be directed to J. Bradley Washa, State Fuels Management Specialist (801.539.4246) or Jessica Wade, State Fire Management Officer (801.539.4091).

Signed by: Edwin L. Roberson Utah State Director Authenticated by: Kimberly L. Dominguez Utah State Records Manager