

**Northern Rockies Coordinating Group
EASTERN ZONE-MILES CITY DIVISION
SUB-GEOGRAPHIC OPERATING PLAN**

Between the

STATE OF MONTANA
Department of Natural Resources and Conservation
Eastern Land Office & Southern Land Office

And the

STATE OF SOUTH DAKOTA
Department of Public Safety, Wildland Fire Division

And the

UNITED STATE DEPARTMENT OF INTERIOR
BUREAU OF INDIAN AFFAIRS
Rocky Mountain Region
Northern Cheyenne Agency

BUREAU OF LAND MANAGEMENT
Montana/Dakotas State Office-Eastern Montana/Dakotas District
Miles City Field Office, North Dakota Field Office & South Dakota Field Office

FISH AND WILDLIFE SERVICE
Mountain-Prairie Region
Charles M. Russell National Wildlife Refuge

And the

UNITED STATES DEPARTMENT OF AGRICULTURE
FOREST SERVICE
Northern Region
Custer Gallatin National Forest
Ashland Ranger District & Sioux Ranger District

STATE OF MONTANA

Department of Natural Resources & Conservation (DNRC)

Eastern Land Office

- Carter County
- Custer County
- Dawson County
- Fallon County
- Garfield County
- McCone County
- Powder River County
- Prairie County
- Richland County
- Rosebud County
- Wibaux County

Southern Land Office

- Big Horn County
- Treasure County

STATE OF SOUTH DAKOTA

Department of Public Safety

Wildland Fire Division

- Harding County

BUREAU OF INDIAN AFFAIRS (BIA)

Rocky Mountain Region

Northern Cheyenne Reservation

BUREAU OF LAND MANAGEMENT (BLM)

Eastern Montana/Dakotas District

Miles City Field Office

North Dakota Field Office

South Dakota Field Office

FISH AND WILDLIFE SERVICE (FWS)

Mountain-Prairie Region

Charles M. Russell National Wildlife Refuge

FOREST SERVICE (USFS)

Northern Region

Custer Gallatin National Forest

- Ashland Ranger District
- Sioux Ranger District

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This Sub-Geographic Operating Plan (Sub-Geo) is hereby made and entered into by and between the Parties pursuant to the Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement and Statewide Operating Plan (23-FI-11015600-048) signed and dated 12/31/2022. This Sub-Geographic Operating Plan, inclusive of any referenced attachments or Exhibits, is tiered to the Montana Statewide Master Agreement and Statewide Operating Plan. The terms and conditions included in this Sub-Geographic Operating Plan shall not contradict any of the terms and conditions of the Montana Statewide Master Agreement or Statewide Operating Plan (23-FI-11015600-048).

I. PURPOSE

This is a Sub-Geographic Area Operating Plan applicable to all signatory Parties within Miles City Division of the Northern Rockies Coordination Group (NRCG) Eastern Zone. Its purpose is to provide a framework of cooperation for cooperative fire protection and wildland fire management between the State of Montana-DNRC, State of South Dakota, BIA-Northern Cheyenne Agency, BLM-Eastern Montana/Dakotas District, FWS-Charles M. Russell, USFS-Custer Gallatin National Forest, and Montana-County Eastern Alliance representative. The *Northern Rockies Interagency Mobilization Guide*, the *Miles City Interagency Dispatch Center Operating Plan*, and the [Montana Offset Protection Map](#) are considered part of this Operating Plan.

This Operating Plan documents the commitment of all Parties to work together in wildland fire management activities. This includes prevention, preparedness, communication and education, fuels treatment and hazard mitigation, fire planning, response strategies, tactics and alternatives, suppression and post-fire rehabilitation and restoration.

The following Exhibits are hereby incorporated and attached to this SubGeo:

Exhibit A- Annual Frequency List

Exhibit B- Principal Contacts

II. RECITALS

Stafford Act responses and related National Response Framework activities will be accomplished utilizing established dispatch coordination concepts. Situation and damage assessment information will be transmitted through established fire suppression intelligence channels.

Jurisdictional Agencies are responsible for all planning documents, i.e. land use, resource and fire management plans and decision support documents, for a unit's wildland fire and fuels management program.

Protecting Agencies implement the actions documented and directed by the appropriate planning documents and decision support documents for initial and extended attack on wildfire incidents. They provide the supervision and support including operational oversight, direction, and logistical support to Incident Management Teams (IMTs).

Supporting Agencies provide suppression or other support and resource assistance to a Protecting Agency.

Local Government Agencies are any county (unincorporated towns), municipality, city, town, special district (i.e. fire district or service area), any Indian tribal government or authorized tribal organization, and any rural community, or other public entity.

The Montana counties within this sub-geographic area each have appointed a Fire Warden who serves in a coordination role with all Local Government Fire Forces within their county. The following counties are within this sub-geographic area: Big Horn, Carter, Custer, Dawson, Fallon, Garfield McCone, Powder River, Prairie, Richland, Rosebud, Treasure, and Wibaux. The Fire Wardens within this sub-geographic area have delegated signatory authority to this agreement to their County Eastern Alliance representative.

Local Fire Departments in the State of Montana are considered part of the Montana Department of Natural Resources through separate Cooperative Fire Control Arrangements between the State of Montana and Local Government Fire Forces within Montana. The Local Government Fire Forces to this Sub-Geo can be signatory to a separate Supplemental Fire Project Agreement for the purposes of non-suppression assistance if they have an active SAM registration for direct reimbursement.

Local Fire Departments within Harding County in the State of South Dakota are considered part of the Department of Public Safety Wildland Fire Division through separate Cooperative Fire Control Arrangements between the State of South Dakota and Local Government Fire Forces within South Dakota.

III. INTERAGENCY COOPERATION

It is to the mutual advantage of the agencies to coordinate efforts on all wildland fire protection activities. This Operating Plan provides a basis for cooperative wildland fire and aviation management activities on adjoining agency, state and private lands within the Miles City Division.

Each agency retains responsibility for management and administrative duties regarding the programs, resources, personnel, facilities, and equipment that are under their jurisdictions.

A. Interagency Dispatch Centers:

- ▶ Northern Rockies Coordination Center (NRCC)
- ▶ Miles City Interagency Dispatch Center (MCC)

Annually, MCC will develop an operating and financial plan that will include an analysis of equitable distribution of all operating and interagency training costs to be funded by each agency as agreed upon by each voting agency. Each agency shall obligate their fair share portion of the financial plan utilizing a separate Agreement or invoiced payment on an annual basis. Each agency, through a separate Agreement will provide agreed to contributions as outlined in the Workload Analysis spreadsheet documented in the *Miles City Interagency Dispatch Center Operating Plan*. This contribution may consist of cash payment

or through work contributions of respective agency employees.

The BLM Montana/Dakotas District Office is the host agency for MCC, providing workspace, telephone and radio systems and IT equipment compatible with dispatch operations. The USFS provides radio consoles and RoIP services.

The Center Manager is delegated full responsibility for the daily supervision of all assigned cooperator employees, except for agency specific personnel rules and regulations that will be handled by the respective agencies.

1. Purpose and Overview

The Parties to this SubGeo agree to maintain, support, and participate in the Miles City Interagency Dispatch Center located in Miles City, Montana.

MCC utilizes resources to meet anticipated and existing incident, preparedness, wildland fire, all-hazard, and prescribed fire needs regardless of geographic location or agency affiliation.

2. Administrative Oversight/Structure

Each of the agencies/parties which are signatory to this Operating Plan shall appoint a representative to the Miles City Dispatch Board of Directors. MCC will receive direction from the Board of Directors. As a functional entity of the Northern Rockies Coordinating Group (NRCG), MCC will also receive some direction from the Northern Rockies Coordination Center (NRCC) located in Missoula, Montana. The NRCC receives direction from the NRCG's Board of Directors.

3. Roles and Responsibilities

The Center Manager and Assistant Center Managers are delegated the authority to coordinate the use and movement of wildland fire and prescribed fire resources between neighboring Tier 3 and Tier 4 dispatch centers and within the guidance of this document on behalf of the signatories and the agencies and resources for which they are responsible. This includes administration of personnel responsibilities for daily supervision needs and the organization of dispatch processes to comply with mobilization guides and emergency related response services.

This delegation is pursuant to *Interagency Standards for Fire and Fire Aviation Operations* (Chapter 19).

5. Dispatch Services

a. Initial and Extended Attack:

Fire dispatching for fires on land protected by agencies will comply with the following:

- i. Resources will be dispatched using the closest force(s) concept. Pre-

planned response plans based on National Fire Danger Rating System (NFDRS) indices will be utilized to guide this process.

- ii. The responsibility for management of the incident will fall to the most qualified initial attack supervisor on the first resource to arrive at the scene. This individual will remain as Incident Commander until released of these duties by the Protecting or Jurisdictional Agency.
- iii. Agencies are responsible to provide information and assistance to each other in a timely manner, for proper completion of the fire reports.
- iv. In the event of an extended attack or when incident management teams are in command of an incident, dispatch actions for that incident will be conducted through the Jurisdictional Agency, unless the Jurisdictional Agency delegates otherwise.
- v. Refer to the *Miles City Interagency Dispatch Center Operating Plan*.

b. Mobilization, Demobilization and Support:

Reference Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement and Statewide Operating Plan (23-FI-11015600-048) and the *Miles City Interagency Dispatch Center Operating Plan*.

c. Aviation:

MCC will notify neighboring agencies of any agency flights that occur within 5 miles of neighboring agency boundaries.

Military Operating Area scheduling and deconfliction with the appropriate military flight scheduling desk will follow established procedures as outlined in the MCC aviation standard operating procedures. MCC will notify the affected agencies when the Powder River Training Complex Large Area Exercises occur via email notification.

d. Prescribed Fire/Fuels Management:

The Miles City Dispatch Center Manager has been delegated the authority to support and move resources between neighboring Tier 3 and Tier 4 dispatch centers within the Northern Rockies Geographic Area in support of prescribed fire needs.

e. All Hazard:

The Miles City Dispatch Center Manager has been delegated the authority to support and move resources between neighboring Tier 3 and Tier 4 dispatch centers within the Northern Rockies Geographic Area in support of non-wildfire emergencies and all-hazard incidents in a manner consistent with the providing agency's mission and management objectives.

B. Interagency Resources:

1. **Mobilization Between Zones:** Per Northern Rockies Mobilization Guide Chapter 10 Policy, all dispatch centers may order resources from their neighbor(s). Tier 3 dispatch centers adjacent to one another in the Eastern, Great Basin, Rocky Mountain, and Northern Rockies Geographic Areas may engage in resource ordering across geographic area boundaries. Supplemental Fire Project Agreements or Interagency Agreements (Fed to Fed) will be required if there is any exchange of funds or a need for cross-billing authorities.
2. **Interstate Mobilization:** The [Interstate Mutual Aid Agreement for Wildland Fire Management Assistance](#) is an agreement to provide mutual assistance in wildland fire incident management. The Northwest Compact, available on [DNRC Agreements, Plans, and Guides](#) website, is an agreement between the U.S. and Canada and multiple states to govern interstate mobilization in support of incident management.
3. **Incident Management Teams:** The Northern Rockies Incident Management Teams (IMT) are identified annually on [NRCC Overhead](#) webpage. The [Northern Rockies IMT Standard Operating Guide](#) (SOG) describes implementation of NRCG's mission for providing direction to Northern Rockies IMT using the national template. The SOG addresses the required elements necessary to successfully assemble, manage, dispatch, perform, and release IMT on all-risk assignments. It is reviewed annually by NRCG, Agency Administrators, and Incident Commanders (IC) to document shared understandings and to incorporate national and regional priorities.
4. **Sub-Geographic Operating Plans (SubGeos):** Sub-Geographic Area Operating Plans are considered supplements to the Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement and Statewide Operating Plan (23-FI-11015600-048).

Sub-Geographic Areas will have at least one Sub-Geographic Area Operating Plan. Each Tier 3 Dispatch Center will have a SubGeo that includes a Financial Plan for illustration of shared costs. SubGeos will be finalized by **March 1** each year to allow adequate time for distribution to Dispatch Centers and interagency fire management staff in preparation for the upcoming fire season. Copies must be sent to the NRCG Executive Assistant by **March 15th**. These plans, when received, will be posted on the NRCG website.
5. **Tribal Resources:** Indian tribal resources may be available for use under this agreement through existing Bureau of Indian Affairs/Tribal cooperative agreements.
6. **Use of Inmate Resources:** Use of inmate resources for Federal fire suppression operations are ordered and coordinated through the State of Montana. The Department of Corrections Operating Plan describes the agreement.
7. **Use of National Guard Resources:** Ordering and Payment of National Guard resources will occur through the State of Montana. Procedures for use of military

resources are listed in the following agreements:

- [Memorandum of Agreement with Montana National Guard and DNRC](#)
- Military Use Handbook (NFES 002175) – regular military forces

8. Use of International Resources: Procedures for use of international resources are listed in the following agreements:

- [Northwest Wildland Fire Protection Agreement \(Northwest Compact\) and Annual Operational Guidelines](#). Ordering and payment of NW Compact resources are through the respective states. Signatory agencies for the Northwest Compact are States of Washington, Oregon, Alaska, Idaho, Montana, and provinces of Alberta, Saskatchewan, British Columbia, Yukon Territories, and Northwest Territories.

International Agreements in the National Mobilization Guide describe the process for use and ordering of international resources by federal agencies.

9. Incident/Project order number: *MCC* will assign the incident/project order number to the Protecting Agency at the point of origin (outside of offset the Jurisdictional Agency is the Protecting Agency). The lead paying agency for wildfires shall be the Protecting Agency at the point of origin, unless or until a Cost Share Agreement is in place.

State fire numbers will be assigned for fires when the DNRC, State of North Dakota, or State of South Dakota assists the county or federal agencies.

C. Standards:

1. All Parties to this Sub-Geographic Area Operating Plan accept the standards for each agency through the duration of an incident, in compliance with the Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement and Statewide Operating Plan (23-FI-11015600-048).
2. The National Wildfire Coordinating Group publication, National Incident Management system: Wildland Fire Qualifications System Guide (PMS 310-1), outlines the minimum requirements for training, experience, physical fitness level, and current standards for wildland fire positions, which all participating agencies have agreed to meet for national mobilization.
3. During initial action, all agencies (federal, state, local and Tribal) accept each other's standards. Once jurisdiction is clearly established, then the standards of the agency(s) with jurisdiction prevail.

D. Local Government Fire Forces (LGFF):

1. LGFF refers to a subdivision of local government organized and administered under Montana Code Annotated, Title 7. The following are interchangeable with the term LGFF:

- Fire departments (career, combination, volunteer) including municipal, rural fire districts, volunteer fire company, fire service area, or county rural fire department
 - County or municipal (e.g., town or city) equipment and personnel
 - Volunteer and paid personnel from local government Fire, Emergency Medical Services (EMS), Search and Rescue, or Law Enforcement organizations
2. Wildland fire protection areas frequently overlap with areas of local government or rural fire protection responsibility (generally referred to as “stacked protection”). The Protecting Agency may negotiate with local government fire forces to describe responsibilities for protection of wildland and structures within their protection boundaries. Follow the NRCG Mobilization Guide and NRCG Supplements (Chapter 50) of the NWCG Standards for Interagency Incident Business Management. The State will work with LGFF to map local departments’ protection areas.
 3. The State maintains Cooperative Fire Control Agreements with all 56 counties. This State/County Cooperative Fire Protection arrangement ensures wildland fire protection on over 55 million acres of state and private land not otherwise covered by a recognized protection agency. The county and its firefighting operations organize, respond, and perform both their respective Title 7 (Local Government Fire Protection) obligations and DNRC’s Title 76 (Wildland Fire) duties as outlined in MCA § 76-13-104. Montana counties agree to provide the basic level of wildland fire protection through a system of rural firefighting organizations and county personnel. In return for this service, cooperating counties receive DNRC support in the form of organizational and technical assistance/advice, fire equipment, training, and direct fire control assistance when required.
 4. The State will incorporate county fire protection chapters into each Sub-Geographic Operating Plan as appropriate. This will define relationships between Federal, State, and County protection entities. LGFF that are not covered under a state or county cooperative agreement cannot be signatory to a Sub-Geographic Operating Plan as provided for in this agreement. Individual agreements with these entities can be made between any federal agency and a LGFF.
 5. LGFF’s are made available to cooperating agencies and the interagency wildland fire system through the State. Dispatching LGFF should follow all the protocols stated in the [NRCG Mobilization of Local Firefighting Forces](#) and [Chapter 50 of the Northern Rockies Supplement to the NWCG Standards for Interagency Incident Business Management](#) .
 6. If LGFF’s enter into Supplemental Fire Project Agreements (SFPA) with a Federal Agency they will need an active SAM registration for direct reimbursement of project funding. The Local Fire Organization entering into a SFPA will need to be signatory to a Sub-Geographic Area Operating Plan confirming their concurrence of the terms and conditions of the Montana Statewide Cooperative Fire Agreement and Statewide Operating Plan (23-FI-11015600-048). These Supplemental Fire Project Agreements will need to be signed by the State, the Federal Agency, and the Local Fire Organization.

E. Fire Wardens:

By virtue of their positions in wildfire response and acting within the scope of this agreement, employees of recognized wildland fire protection entities are approved and recognized by the State as a Fire Warden, as authorized in 76-13-104 (7) and subject to the duties of 76-13-116.

By May 1st of each year, Federal Agencies will furnish to the State the names of individuals recommended for appointment as Fire Wardens. The State will appoint Fire Wardens as appropriate. Fire Wardens have the authority to administer State of Montana fire protection laws and rules.

V. PREPAREDNESS**A. Protection Planning:**

1. The Jurisdictional Agency may utilize its own personnel and equipment to conduct fuels management, planned ignitions, or other related preparedness tasks (e.g., Restrictions Compliance) on its lands protected by another agency. All activities will be coordinated with the Protecting Agency.
2. The Protecting Agency will need a separate agreement to conduct fuels management, planned ignitions, or other related preparedness tasks (e.g., Restrictions Compliance) on Jurisdictional Agency lands.

B. Protection Areas and Boundaries:

An interactive map of [Current Wildfire Protection in Montana](#) is maintained by MT DNRC. The map will be reviewed annually at the Sub-Geographic level. Maps and databases that depict wildland protection unit boundaries, lands that have been exchanged for protection purposes and areas that have local government fire protection responsibilities are compiled and maintained by the State. Protection agreements will be reviewed annually at the Sub-Geographic level; changes to protection will be approved at the Regional (federal) and Bureau (state) level. Reciprocal initial attack zone and Special Management Areas will be documented in Sub-Geographic Area Operating Plans. Initial attack, mutual aid, or assistance for hire among federal, state, and local government entities should be described in this Sub-Geographic Operating Plan or in local agreements between federal agencies and local entities.

C. Methods of Fire Protection and Suppression**1. Reciprocal (Mutual Aid) Fire Assistance:**

The Parties to this Sub-Geographic Operating Plan and the Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement (23-FI-11015600-048) consider their lands in the State of Montana affected by this agreement to be reciprocal. The Mutual Aid period between the Parties to this agreement is 4-24 hours. Mutual Aid periods are described in Sub-Geographic Area Operating Plans. Supporting Agencies will not bill the Protecting Agency for incident costs during the Mutual Aid Period. If Supporting Agency's

resources are ordered to stay past the Mutual Aid Period, their costs are reimbursable. If the cost threshold of \$5,000 is reached, all costs accrued by the Supporting Agency, including costs accrued during the Mutual Aid Period are reimbursable. *Aircraft apparatus is always reimbursed.

When a Local Government Agency takes suppression action across jurisdictional boundaries in support of a Protecting Agency, the Protecting Agency will not be required to reimburse the Local Government Agency for costs incurred following the initial dispatch of any ground resources to the fire for the duration of the reciprocal period.

- State of Montana Counties - Reciprocal Fire Protection Agreements (Mutual Aid): The Local Government Agency shall assume its own full cost of expenditures for a maximum of eight hours, the reciprocal period, unless the Protecting Agency requests the Local Government Agency to assist during any time of the incident. If the Protecting Agency IC requests the Local Government Agency to assist, the Local Government Agency may be paid back to the first hour of initial dispatch to the incident.

In addition, the Federal agencies may provide a maximum of twenty four hours of mutual aid to Counties on State or private lands in Montana. Refer to DNRC-County Cooperative Agreements.

- Harding County Volunteer Fire Departments (Camp Crook, Harding, Ludlow)- Reciprocal Fire Protection Agreements (Mutual Aid): The Harding County VFDs shall assume their own full cost of expenditures for a maximum of three hours, the reciprocal period, unless the Protecting Agency requests Harding County VFDs to continue to assist past the reciprocal three hour period. If requested by the protecting agency, the Harding County VFDs may be paid back to the first hour of initial dispatch to the incident. Refer to the State of SD/Harding County VFD Agreement.

In the case of reciprocal fire protection, priority will be given to the release of a supporting Agency when it is mutually agreed upon by the initial attack forces that the fire situation is such that the Protecting Agency's forces on the scene can adequately control the incident. Furthermore, within its capabilities, the Protecting Agency will render support to the supporting Agency to include but not limited to food, water, and additional forces to expedite release of the supporting Agency in advance of the maximum twelve hour reciprocal fire protection.

2. Exchange (Offset) Protection

The BLM, FWS, Forest Service and the State have negotiated an exchange of protection, which redistributes fire protection responsibilities throughout the state. The exchange is based on acreage and agreed to by all Parties. The process used provides an acceptable balance of exchange and mutual benefit. Official maps and narratives documenting the exchange are available online at the [Montana Offset](#)

Protection Map.

Separate Interagency Agreements between the Forest Service and the Department of Interior Land Management Agencies describe the terms of a federal-to-federal offset protection exchange. Where this Interagency Agreement applies, the State is a Supporting Agency. Areas where federal to federal offset exist will be described in this Sub-Geographic Operating Plan and the appropriate Interagency Agreement will be referenced.

All fire suppression costs on such lands where offset protection is employed will be borne by the Protecting Agency. Suppression resources requested by the Protecting Agency and provided by the Jurisdictional Agency or Supporting Agencies on these lands is reimbursable.

The Master Statewide Offset Map will be adjusted, as needed, every five years in conjunction with the updates to the Montana Statewide CWFMA. Realignment of offset protection boundaries statewide will originate at the sub-geographic area (NRCG Zone) level when interagency fire management staff redistribute offset acres to maximize efficiency and align protection responsibilities with their agencies' missions. All realignment will be approved at the Regional and Bureau level, documented in the Montana Offset Protection Map, described in Sub-Geographic Area Operating Plans, and distributed to affected Dispatch Centers.

The states and counties will furnish fire protection consistent with each state's requirements on state and private lands. State and private lands that lie within federal boundaries, that are not affidavit lands or a part of a protection agreement, are protected by the counties. State of Montana and County Cooperative Agreements exist for each county in Montana. The State of South Dakota has established agreements with the Volunteer Fire Departments in Harding County.

The BLM will furnish fire protection to BLM, Montana Affidavit lands, and Custer Gallatin National Forest lands, and forested State lands in Harding County, South Dakota within the Miles City Division. This agreement is established in the *Montana Statewide Operating Plan*.

FWS, State and Affidavit lands within the refuge executive boundary, in Garfield and McCone counties are protected by FWS fire crews located in Sand Creek and Fort Peck. The FWS provide fire personnel to staff the Jordan BLM engines that provide assistance on wildland fires within the FWS boundary per *Memorandum of Understanding between the BLM-Eastern Montana/Dakotas District & FWS-Charles M. Russell NWR*.

The Northern Cheyenne Agency will furnish fire protection on trust lands, which is established in the *Bureau of Indian Affairs Rocky Mountain Agreement*.

D. Supplemental Fire Project Agreements (SFPA)

Sub-Geographic Operating Plans (SubGeos) will list or reference SFPAs, if applicable. SFPAs are separate to this agreement and can only be executed by signatory parties to

this agreement. Use Exhibit I from the MT Master CFMA (23-FI-11015600-048) as a template to all SFPAs.

These projects may involve such activities as prescribed fire/fuels management, preparedness, fire analysis/planning, rehabilitation, training, prevention, public affairs, and other beneficial efforts in support of cooperative fire management. Implementation of such projects will require a Supplemental Fire Project Agreement.

Reference Exhibit C, Table 1 of this SubGeo for list of active SFPAs within this Sub-Geographic Area applicable to the parties signatory to this SubGeo. The intent behind this is to provide corporate knowledge to all the signatory parties as to what SFPAs exist and can be used to support each other's efforts, leverage each other's resources, and prevent duplication of efforts.

E. Interagency Agreements (IAA)

Interagency Agreements (Fed to Fed) are executed between two federal agencies to describe protection exchange areas/responsibilities and/or when federal agencies exchange funds for non-suppression activities. These IAA's are not tiered to the Montana Master Statewide CFMA but are referenced in this SubGeo to provide corporate knowledge to all the signatory parties. Reference Exhibit C, Table 2 of this SubGeo for list of Active IAA's within this sub geographic area.

F. Other (MOU's, other Cooperative Agreements)

There may be other types of Cooperative Fire related agreements, MOU's, or other documents that are in place to describe protection exchange areas between agencies not signatory to this agreement but applicable to this Sub-Geographic Area. Reference Exhibit C, Table 3 for list of active "Other" agreements/documents applicable to cooperative fire protection/fire management operations within this sub geographic area.

G. Fire Prevention and Education

The Agencies will share and jointly work together to deliver fire prevention and education programs. Activities may include joint press releases, Smokey Bear programs, campaigns such as One Less Spark, One Less Wildfire, and local education programs. The Agencies shall share the cost of prevention and education activities as agreed to and documented in this SubGeo but may not seek reimbursement from the cooperating agency without an executed Supplemental Fire Project Agreement or other written agreement.

Agencies will coordinate fire prevention, education and mitigation programs and activities, including county and rural fire assistance, in the communities located in the Miles City Division.

H. Public Use Restrictions

Public use restrictions/fire prevention orders will be coordinated between all agencies, so that a unified message can be delivered to the public. It is the responsibility of each agency to issue public use restrictions/fire prevention orders. Montana Restrictions Orders and Maps will be available at the Montana Wildland Fire Information webpage. Fire restrictions in the state will be conducted as per the NRCG Restrictions and Closures

Guide. The NRCG Restrictions and [Closures Toolbox](#) contains Area Plans, Publications, and Products associated with Stage I and II Restrictions, local burn bans and closures. Individual tribal governments may have a localized restriction order or resolution process. NRCG Area Restrictions Coordinators will post Fire Restrictions and Interagency Orders at www.MTFireInfo.org

Imposing Fire restrictions is the responsibility of the agency administrator of each agency. The decision to enter Stage 1 or 2 Fire Restrictions is based on current and expected weather and fuel conditions, and the frequency of human caused wildfires and their cause. Should an agency or government impose fire restrictions within their jurisdiction, enforcement of those restrictions is incumbent upon the agency that imposes the restriction.

I. Burning Permits:

1. Burn permits are needed on private lands classified as forested by the State.
2. Many counties have adopted a [County Burn Permit and Notification Service](#). This allows citizens to apply for a burn permit online. The service allows for communication to the public regarding smoke management, fire danger, burn bans, and best practices when burning debris or agricultural lands. The service can be set up to collect funds from permittees, or the county may choose to pay for the service and set up free access. When a county participates in the online system, wildland fire management agencies and dispatch centers can access an auto-generated map of active burn permits in their county on any given day.
3. If a Protecting Agency wishes to issue burn permits for lands outside its jurisdiction, it must coordinate with the Jurisdictional Agency for delegated authority. Enforcement of burn permit violations, arson, or trespass is the responsibility of the Jurisdictional Agency, unless the fire is adjacent to, or threatens, another agency's jurisdiction.
4. Burn Permits are identified in specific State-County Cooperative Agreements.

J. Prescribed Fire (Planned Ignitions) and Fuels Management:

Planned projects will be coordinated. Agencies will follow agency requirements and exchange of funds will be documented in a separate Supplemental Fire Project Agreement (SFPA).

Prescribed fire and fuels management activities will be addressed in SFPAs or other separate agreements, or if requested on a detailed resource order. For federal agencies, billing will follow the guidance set in the [Interagency Agreement for Fire Management](#) as signed by the federal agency administrators.

Each Agency will retain responsibility for their fuels management program. The equipment and resources of all agencies may be utilized to support each other on a reimbursement basis. Reimbursement will be agreed upon prior to project implementation.

It is the responsibility of the initiating Agency to ensure adequate funding is available. There must be an active agreement for reimbursement of suppression and non-

suppression activities. Work performed without an active agreement may warrant a ratification.

Fire crews may be utilized for resource improvement activities, as negotiated, with approved work plans.

K. Smoke Management:

1. Air Resource Advisors: Ensure smoke impacts to the public and fire personnel are addressed through the IMT ordering Air Resource Advisors (ARA) on Type 1 fires and consider ordering ARA to Type 2 fires per the Interagency Standards for Fire and Fire Aviation Operations (Red Book) and Public Law 116-9, the Dingell Act, 2019. ARA are members of the Wildland Fire Air Quality Response Program and are specialists in smoke management and air quality. An ARA is recommended when an incident has smoke management objectives and/or smoke is expected to impact communities or sensitive populations for an extended period. ARA are ordered in Interagency Resource Ordering Capability (IROC) as Technical Specialists (THSP). Additional information on ordering an ARA can be found in the Northern Rockies Mobilization Guide.
2. Montana/Idaho Airshed Group: Agencies in Montana and Idaho are members of the Montana/Idaho Airshed Group and coordinate smoke management from prescribed fire actions following specific protocols. The group's procedures are outlined in the Montana/Idaho Airshed Group Operating Guide website.
3. During the Winter season (December 1 – February 28), smoke management decision support of remember burners, including meteorology and notification of any open burning restrictions, are no longer coordinated, or communicated via the Airshed Management System. It is the responsibility of the burner to comply with any/all restrictions/regulations issued by county, state, and tribal coordinators/officials. It is the responsibility of the burner to check the applicable open burning information for their geographic area prior to ignitions. In Montana, from December 1 – February 28, winter burning must have direct approval from the [Montana Department of Environmental Quality](#) at least three days before you burn.
4. Northern Cheyenne has a Class 1 Airshed.

L. Coal Seams:

Coal is naturally occurring and located in rock strata in layers or veins called coal beds or coal seams. Exposed coal seams are abundant through southeast and central Montana as well as western North Dakota and South Dakota. Coal seam fires pose a serious problem that can be a hazard to firefighter's health and safety. Coal seam fires can emit toxic gases, including carbon monoxide, sulfur dioxide, and other potentially hazardous gases.

Firefighters are typically not equipped or trained for coal seam fires and should not attempt to extinguish such fires with hand tools and engines.

Signs of a coal seam fire may include a rotten egg smell, smoking white ash, and continuous or non-continuous lines of what appears to be smoldering black rock (coal)

where the flame may or may not be visible. Avoid low lying terrain in known coal seam fire areas especially early in the morning when air temps are cool. Gas tends to sink when air is cool and will accumulate in low lying areas.

Notify all incoming incident command teams and firefighting resources of known locations of exposed coal seams, coal mines, or abandoned coal mines adjacent to ongoing incidents and the risks and precautions to take when working around coal seam fires.

V. OPERATIONS

A. Fire Notifications:

Detection will be coordinated between agencies as needed. All fires detected will be reported to the appropriate dispatch center. If applicable, Sub-Geographic Operating Plans shall specify notification procedures and timelines, to include timeframes when final fire reports will be sent to jurisdictional agencies.

The Agencies agree to participate in the neighborhood dispatch system. MCC will notify Jurisdictional Agencies, including County Sheriff's Offices, about wildland fires that impact the Miles City Division.

- All methods of detection may be employed throughout the fire season.
- Aerial detection will be managed through MCC for the Miles City Division.
- Fire Lookout Towers on USFS lands will be staffed by the BLM as budget allows.

All fires and initial action on or near land under the protection of an Agency to this agreement will be reported as soon as possible to the Protecting Agency through the appropriate dispatch center, which includes Federal Dispatch Centers (i.e. MCC) or County Sheriff's Offices. Upon notification, if the Protecting Agency fails to properly recognize and claim ownership, suppression costs for the Protecting Agency's proportionate share will be assessed upon discovering and proof of ownership by the agency that incurred suppression costs.

It is the responsibility of the Duty Officer(s) to notify agency administrators or delegate of emerging fires that require an extended attack management. The FMOs will involve agency administrators before ordering an Incident Management Team. Orders for Incident Management Teams will be placed through MCC. Fires involving multiple jurisdictions will be managed under a unified command.

As incidents grow in complexity, communication will be established with the jurisdictional Agency Administrator to ensure resource objectives are met.

The Agencies will assist each other when fires escape initial attack. Requests for personnel, equipment, aircraft and logistics support for fires that escape initial attack on federal lands will be requested through MCC. For the counties the request will be placed through the county commissioners to the Montana DNRC; in South Dakota to the State Division of Wildland Fire; and in North Dakota to the North Dakota State Forest Service.

B. Boundary Line Fires:

Units are expected to review boundary areas annually with neighboring agencies to determine whether preplanned response strategies, (e.g., run cards, special management considerations, potential operational delineations), are still appropriate for each other's jurisdictional interests. Plans to resolve adjacency issues will be documented in Sub-Geographic Operating Plans and on maps referenced in those plans. Those plans will guide the development of cost share agreements if multi-jurisdictional fires occur in the area.

When a wildland fire that is being managed for resource objectives, spreads into a neighboring jurisdiction where fire is not wanted, the managing jurisdiction shall be responsible for wildfire suppression costs.

A fire burning on or adjacent to a protection boundary will be the responsibility of the protecting cooperators on either side of the boundary. Neither party will assume the other party is aware of the fire or that the other party will take action. Each party will make every reasonable effort to communicate with the other concerning the fire.

Refer to Appendix D for the FWS policy concerning boundary fires.

In instances where the protecting agency response is constrained/delayed by distance, the closest protection agency should respond. These areas need to be identified and agreed upon between protecting agencies. In some instances, protecting agencies may develop agreements for protection if distances are prohibitive to a timely initial attack.

C. Independent Action on Lands Protected by Another Agency:

1. Any participating agency may, upon its own initiative, at the risk of their own expense, and with appropriate notification and coordination, respond to wildland fires on lands that are under the direct protection of another agency. All fire suppression actions conducted on lands of other Agencies shall be consistent with the Jurisdictional Agency's land management policy.
2. Parties to this Agreement shall not perform any fire suppression action that is contrary to limitations found in associated Sub-Geographic Operating Plans.

D. Response to Wildland Fire:

1. Agency administrators should include nearby jurisdictions and landowners that could be affected, through planning, strategy development, seeking additional information to understand the adjacent landowners' concerns.
2. Wildfires on federal lands that are not human caused may be managed for multiple objectives as established in land and resource management plans. These areas and the process for fire management in these areas will be documented in Sub-Geographic Operating plans. Adjacent fire protection entities, including state and local government, should be consulted regarding fire management strategies utilized in these areas, and share decision-making whenever possible. For fires under protection responsibility of the state, under Montana Statute, the State's objective in response to wildland fire is fire suppression.

3. All fire agencies have primary responsibility for fire suppression with their respective protection areas. All agencies, as appropriate, should be involved in developing the strategy, tactics, and mitigation actions to be used if the fire has potential to impact another protection area. When the fire spread to another protection area is imminent or appears likely, the agencies will identify financial responsibilities and, as appropriate, cost share methodologies, and document the decisions and rationale. If agreement cannot be reached regarding financial responsibilities, discussion will be elevated to the next level agency administrators for the respective agencies.
4. Protecting agencies will share staffing level response to meet Jurisdictional Agency objectives. These expectations/staffing levels will be discussed between both Parties and the expected response will be agreed to annually. Protecting agencies will be expected to be fully staffed from June 1 until September 15 each year. Protecting agencies will be expected to respond to wildfires outside of these dates as conditions warrant but may not be fully staffed depending upon funding. If a Protecting Agency is not able to provide the resources required for additional staffing outside of these dates or to meet additional resource protection requirements for the area due to special management requirements (i.e., additional resource protection requirements protecting sage grouse habitat, special events on Jurisdictional Agency land, etc.), the Jurisdictional Agency may provide additional preparedness costs or additional resources to the protection agency. Additional preparedness costs and resources should be discussed between all agencies involved in the offset, to facilitate a balance, if necessary, across the state.
5. Agency-specific protocols governing fire suppression are located in the following Appendices to this AOP: (a) Appendix D for CMR lands administered by the USFWS in the Miles City Division; (b) Appendix E for CGF lands in South Dakota and Montana within the Miles City Division; and (c) Appendix F for Harding County, South Dakota.
6. Special concerns for firefighter safety specific to areas with known radiation concerns and specific geological hazard areas: Coal seams, H₂S, abandoned uranium mines, and known Erionite formations are addressed in Appendix E.

E. Prescribed Fire/Fuels:

Joint funding, staffing, and utilization of resources and facilities may be pursued when a combined approach is appropriate and cost effective. Specific project goals and objectives must be identified for the funding and resources. Shared staffing and funding must be commensurate with each agency's use of the resources. An agreement shall not circumvent hiring or leasing regulations, policies, or procedures.

There must be an active agreement in order for reimbursement of suppression and non-suppression activities. Work performed without an active agreement may warrant a ratification per FSH 1509.11 chapter 10. Exigent need applies only within 30 calendar days from the start of work.

A Supplemental Fire Project Agreement may involve cost sharing. Projects identified and documented must align with the scope of the Reciprocal Fire Protection Act. In all cases,

contributions to project costs must be clearly identified in a financial plan.

*Reference Provision III. *Interagency Cooperation, D. Local Government Fire Forces (LGFF's)*, 6. when entering into a Supplemental Fire Project Agreement with a Local Government Fire Organization sponsored by the State.

F. Decision Process:

The development of suppression strategies and tactics should consider the probability of success, safety risk mitigations, available resources, values at risk, social and political values, and existing legal statutes. The decisions should be documented per each agencies policy and included in the incident file. A wildland fire decision document will be completed by the Jurisdictional Agency per agency requirements. The wildland fire decision documents the Jurisdictional Agency’s direction for the specific incident. Periodic assessments by the agency administrator of the wildland fire decision will occur.

The Wildland Fire Decision Support System (WFDSS) is used by the federal agencies and the State uses the Incident Situation Assessment (ISA).

The Jurisdictional Agency provides resource-based input to the incoming team through the Jurisdictional Agency’s line officer signature delegation, development of the wildland fire decision document, and presence of a Jurisdictional Agency resource advisor on the incident. The Delegation of Authority (DOA) will incorporate these planning documents and will clearly communicate the intent of the leader(s). The DOA will be signed by all Agencies based on incident requirement.

It is recognized that initial attack and rapidly expanding incidents often involve multiple jurisdictions. Determining the appropriate jurisdictions and obtaining delegations of authority in an efficient and effective manner is often difficult and may be further hampered by the remoteness of incidents in relationship to Agencies having authority and jurisdictional responsibility.

The Agencies which are party to this AOP agree that initial attack delegation will be valid until a Protecting Agency Incident Commander or agency representative from the Agency having jurisdiction is on scene, or a revised or updated incident specific delegation of authority is signed. Incidents that have been declared as exceeding initial attack and transition to extended attack should have an incident specific delegation of authority in place as soon as possible. The delegation of authority for Type 3 or Type 4 incidents may be verbal or written based on the Agency Administrator’s determination.

The jurisdictional agency will assume the lead for development of the decision document and delegation of authority as required. Appropriate fire management officials will provide information relevant to the initial stages of the decision document and may provide the situational briefing for the incoming Incident Management Team. If other jurisdictions are involved, the delegation of authority will be signed by all affected agency administrators, or their designees and a unified command will be established to manage the incident.

The following decision document will be used as needed as according to policy:

- USFS – WFDSS

- Montana State – Incident Situation Analysis
- Montana Counties – Incident Situation Analysis
- BLM – WFDSS
- BIA – WFDSS
- South Dakota State – WFDSS
- USFWS – WFDSS

For multi-jurisdictional incidents that require a decision document, the point-of-origin jurisdiction agency decision document will become the primary decision tool used by all affected agencies for that incident. Regardless of decision document utilized, the Federal Agencies must complete a WFDSS document.

G. Cooperation:

All Parties will be involved in developing strategy and tactics which would be used if a wildland fire does cross jurisdictional or protection boundaries. Neighboring Jurisdictional or Protecting Agencies should provide prompt notification to neighboring agencies when concerns exist about fires that have the potential to impact adjacent jurisdictions or protection areas.

The levels of fire complexity and command will vary among agencies. All fires will have an incident commander who is in control of the incident. Unified command will be employed on fires that involve multiple protection jurisdictions. Agencies who provide fire protection for another through agreement will be provided with an agency representative or contact to the incident commander for and specific land management guidance regarding suppression activities.

H. Communication:

1. Communications should occur prior to fire seasons and during the early stages of wildland fires. Agencies managing fires, especially those with multiple objectives, should consider firefighter and public safety, predicted weather conditions, resource drawdown, proximity to private property, values at risk, smoke, current and anticipated fire activity, and time of season.
2. News releases are issued through the jurisdictional public affairs offices of each agency. Where applicable, news releases should be coordinated between the agencies.
3. The Incident Status Summary (ICS-209), submitted to the GACC, is used to report large wildland fires and any other significant events on lands under federal protection or federal ownership. Large fires are classified as 100 acres or larger in timber fuel types, 300 acres or larger in grass fuel types, or when a NIMO, Type 1 or 2 Incident Management Team is assigned, regardless of the size of the incident or the suppression management strategy.
4. Frequency sharing between agencies is allowed per FCC (Federal Communications Commission) and NTIA (National Telecommunications and Information Administration) rules. Frequency use is authorized via written MOU to ensure compliance with the respective agencies' official license/authorization parameters.

5. Each year, all signatories to the Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement (23-FI-11015600-048) coordinate to publish and distribute the NRCG Frequency Guide, detailing the frequencies that are issued to each agency within the Northern Rockies. The guide is not published online. It is available for reference by contacting the NRCC's Aviation Desk.
6. Reference Exhibit B of this Sub-Geographic Area Operating Plan for the MCC Annual Frequency List

The agencies agree to allow the use of communication systems such as, computer system access, data transmission lines, and communication sites when there is mutual benefit to the parties, and permits agencies to access communications sites for purposes of annual maintenance and up keep of their respective radio and repeater equipment. Access means travel routes to and into the buildings where equipment is housed.

The FCC requires that individual Memorandums of Understanding be developed and signed when an agency is using another agency's radio frequency for Joint Operations and Mutual Aid.

MCC will have the Radio Communication Plan and radio frequencies available at request.

I. Delegation of Authority (DOA):

1. The Protecting Agency has delegated authority for fire suppression responsibility as per this agreement, and, as such, is responsible for drafting a DOA for an Incident Management Team (IMT). The Protecting and Jurisdictional Agencies are encouraged to jointly develop and sign DOAs for Type 4 and 5 incidents.
2. In the case of an incoming IMT (Type 1, 2, 3), or Complex Incident Management Teams, the Protecting and Jurisdictional Agencies are encouraged to jointly develop and sign the DOA.
3. The Jurisdictional Agency maintains all other jurisdictional authority.
4. The Custer Gallatin National Forest annually presents a DOA to the BLM Incident Commanders.

J. Preservation of Evidence:

1. As initial action is taken on a fire, initial attack resources will preserve information and evidence pertaining to the origin and cause of the fire regardless of jurisdiction. All costs related to those activities will be the responsibility of the Protecting Agency.
2. The Protecting Agency will notify the Jurisdictional Agency as soon as possible if the fire may potentially be a trespass fire. Protecting and Jurisdictional Agencies shall render mutual assistance in the gathering of evidence. If the cause is determined to be human or unknown, the Incident Commander will request a wildland fire investigator (INVF) through dispatch.

All initial attack resources shall determine probable fire cause, whether human or natural. Cause determination must begin as soon as possible since evidence is easily destroyed. If the fire is suspected to be human-caused, every effort will be made to protect the origin, regardless of jurisdictional responsibility.

K. Fire Investigations:

1. The Jurisdictional Agency of a human caused wildfire’s origin will be the lead agency on all fire trespass and litigation matters following that agency’s policies. The Jurisdictional Agency may conduct an investigation into cause and may pursue costs related to suppression operations (suppression repair), resource damage, and area emergency resource rehabilitation.
2. The lead Jurisdictional Agency will work with supporting agencies to collect costs (including supporting documentation); federal agencies may collect costs for other federal agencies and distribute any collections that may be received following each agency’s policy. Federal agencies cannot collect costs on behalf of the state.
3. For fires that affect, threaten, or are adjacent to multiple jurisdictions, agencies leaders will consult each other to determine the lead investigatory agency.

The Protecting Agency will notify the Jurisdictional Agency as soon as possible if the fire may potentially be a trespass fire. It is the Jurisdictional Agency’s responsibility to request an investigation. Either the Protecting or Jurisdictional Agency may furnish a qualified Fire Investigator (INVF).

The Agencies may pursue any costs related to fire suppression costs, resource damage, and area emergency resource rehabilitation.

L. Structure Fire Protection:

The Parties will follow the [NRCG Community and Structure Protection Guidelines](#), which should be used in setting expectations for community and structure fire protection as well as providing leaders intent in any DOA. Anytime structure protection activities occur, the decisions, actions taken, and financial responsibilities should be documented.

The protection of human life is the single, overriding priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources will be based on the values to be protected, human health and safety and the costs of protection. Once people have been committed to an incident, these human resources become the highest value to be protected. All WUI fires within the Miles City Zone are coordinated through MCC. The federal and state protecting agencies primary responsibility and objective for structure fire protection is to suppress wildfire before it reaches structures. The federal and state protecting agencies may assist tribal, county, district and municipal fire departments in exterior fire protection when requested. Exterior structure protection measures may include tactics such as foam or water application to exterior surfaces of buildings and surrounding fuels; fuel removal, and burning out around buildings and improvements. Structural fire protection which involves interior and exterior action on burning structures is the responsibility of tribal, county, district or municipal fire departments that have the jurisdictional authority, training, and equipment to take appropriate action where needed.

M. Invasive Species Mitigation:

The Parties agree to take reasonable steps to prevent the introduction and spread of invasive plant, terrestrial, and aquatic species during fire operations and to follow, to the extent practicable, the [NRCG Guidance](#), AIS Decontamination/Prevention Methods for Air to Ground Wildland Fire Water Delivery Resources and, a “how-to” guide for Northern Rockies Incident Management Teams, Decontaminating Firefighting Equipment to Reduce the Spread of Aquatic Invasive Species. The Jurisdictional Agency may also provide a resource advisor.

N. Fire Suppression Repair:

Suppression activity damage repair will be the responsibility of the protecting agency or cooperator. Resource Advisors will be consulted prior to initiating any agency land rehabilitation work. Emergency Stabilization and Burned Area Rehabilitation will be the responsibility of the jurisdictional land agency.

For Federal agencies, requests for Emergency Stabilization and “Burned Area Rehabilitation” (BAR or BAER) assessments will be initiated by the jurisdictional agencies.

The Local Agencies will need to consult with the State of MT or State of SD for guidance on requesting Suppression Activity Damage Repair and ES/BAR actions on Private or State lands.

O. Resource Advisors:

In an initial attack, extended attack or escaped fire situation, the protecting agency will contact the jurisdictional agency, and the jurisdictional agencies will assess the need to assign a qualified Resource Advisor. Under unified command, agencies involved will jointly assess the need to assign a Resource Advisor and make recommendations or act on behalf of the agency administrator for decision.

VI. USE AND REIMBURSEMENT OF INTERAGENCY FIRE RESOURCES

A. Cost Share Agreement (Cost Share Methodologies):

Examples of cost sharing methodologies may include, but are not limited to, the following:

1. When a wildland fire that is being managed for resource objectives spreads to a neighboring jurisdiction where fire is not wanted, the managing (or protecting, as the case may be) jurisdiction may be responsible for wildfire suppression costs.
2. In those situations where weather, fuels, or fire behavior of the wildland fire precludes stopping at jurisdiction boundaries, cost share methodologies may include, but are not limited to:
 - a. Each jurisdiction pays for its own resources – fire suppression efforts are primarily on jurisdictional responsibility lands.

- b. Each jurisdiction pays for its own resources – services rendered approximate the percentages of jurisdictional responsibility, but not necessarily performed on those lands.
 - c. Cost share by percentage ownership.
 - d. Cost is apportioned by geographic division or percent of effort. Examples of geographic divisions are: Division A and B (using a map as an attachment); or specific locations such as a campground.
3. For further examples check the [NRCG Methodologies](#).

B. Training:

The Parties to this SubGeo will cooperate to ensure that training is provided that will produce safe and effective fire management and aviation programs. The intent is to champion high-quality training, to minimize training costs by sharing resources, and to standardize content. Local Government Fire Forces will be included in this cooperative approach whenever practical. As applicable, all training will meet NWCG 310-1 standards.

1. [NRCG Training Ops Guide](#) is available online and describes the mission of the NRCG Interagency Fire Training program is to provide and ensure quality training in Wildland Fire Suppression, Incident Management, Aviation Management, Fuels Management, and Leadership Management that is responsive to the needs and direction of the NRCG’s member agencies.
2. Interagency cadre and subject matter experts are encouraged when delivering interagency content.
3. The Northern Rockies are divided into training zones. Each zone has an interagency Zone Training Coordinator (ZTC) who sits on the NRCG Training Committee. The committee meets semi-annually in the spring and fall, and as needed at other times of the year, and is responsible for oversight of course selection, presentation, student selection, and training at the Northern Rockies Training Center (NRTC). Zones are allocated seats for each training session.
4. Nominations to NRTC courses are prioritized and submitted through the ZTC or the Geographic Area Training Representative (GATR) hosting a nominee from NF by utilizing the established nomination process for each session. All ZTC and the GATR will finalize a prioritized list of nominees to NRTC, NAFRI, and Out of Geographic Area training at the 300-level and above.
5. NRCG member agencies do not pay tuition for most courses at NRTC; the exception to this is typically found when course cadre are paid contractors.
6. There must be an active agreement in order for reimbursement of non-suppression (Cooperative Training) activities. Work performed without an active agreement may warrant a ratification per FSH 1509.11 chapter 10. Exigent need applies only within 30 calendar days from the start of work.

C. Communication Systems:

Federal agencies and DNRC share space in collocated communication sites across the

state where it is advantageous to do so.

Shared radio sites include Home Creek Butte in Powder River County, Poker Jim Lookout in Rosebud County, Tripoint in Carter County, Sheep Mountain in Prairie County, and Government Hill in Custer County.

D. Fire Weather Systems:

The [NR Fire Weather Operating Plan](#) is a joint effort between land management agencies of the NRGBA, the [Northern Rockies Predictive Services Unit](#) (PSU) and the National Weather Service (NWS) offices in Billings, Bismarck, Glasgow, Grand Forks, Great Falls, Missoula, Riverton, and Spokane. The purpose of the plan is to coordinate the NWS and PSU products and services provided to the land management community.

1. National Fire Danger Rating System (NFDRS) forecasts are provided on a daily basis from late spring until the end of wildfire season.
2. Spot forecasts will be issued for wildfires, prescribed burns, or other incidents when requested. Please furnish the data indicated on the online [Spot Weather Forecast Form](#) to your local NWS office.
3. Fire Weather Watches and Red Flag Warnings will be issued as conditions warrant, in conjunction with critically dry fuels.
4. Remote Automated Weather Stations (RAWS) provide current weather data across Montana and are located [online](#). When operating Remote Automated Weather Stations, Montana DNRC will meet national standards for data requirements and station maintenance requirements.
5. The [Fire Danger Pocket Card](#) provides a format for interpreting and communicating key index values provided by the NFDRS. The Pocket Card provides a description of seasonal changes in fire danger in a local area. It is useful to both local and out-of-area firefighters.
6. Refer to the *Miles City Interagency Dispatch Center Operating Plan*.

E. Incident Meteorological (IMET) Services:

Onsite weather support to large wildfires, prescribed fires, and other major incidents is available. IMETs can be ordered through dispatch for wildfire incidents. In all cases, the ordering process for IMET and supporting equipment is detailed in Chapter 20 of the [National Interagency Mobilization Guide](#). Conditions of these dispatches are in the [National Interagency Agreement for Meteorological and Other Technical Services](#) publication. When ordering an IMET for a prescribed burn, specify:

- That the request is for a prescribed fire project; and
- Expected number of days the IMET will be deployed.

F. Aviation Operations:

Montana state aircraft are not approved for use by federal agencies. Under emergency circumstances, where human life is immediately at risk by wildfire on federal lands under federal protection, a federal line officer can approve the use of non-federally approved aircraft to address the immediate threat. This exemption must only take place when

sufficient federal firefighting aircraft are not readily available to meet the emergency need. Per Interagency Standards for Fire and Fire Aviation Operations, Chapter 16, “All approved Cooperator aircraft used on federally-managed fires shall be released when federal aircraft become reasonably available.”

Aviation operations are governed by agency specific policies (i.e. DOI Manual 350, BLM 9400; FS 5700; DNRC 1500; etc.). Aircraft responding to fire suppression efforts will retain their own Agency’s standards. There are interagency requirements which must be met (such as interagency inspection and carding/approval) to fly agency employees on partnering Agency aircraft.

As part of the aviation support to initial attack activities, Duty Officers should attempt to consult with the Jurisdictional Agency who manages the land before retardant is applied in potentially sensitive areas. Refer to Appendix E and the USFS-Custer Gallatin National Forest Aviation Plan.

G. Accident Investigations:

See Exhibit J of the Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement (23-FI-11015600-048) for Wildland Fire Incident and Accident Types and Definitions. Exhibit J is intended to inform Protecting Agencies of the types of investigations required by Jurisdictional Agencies related to wildland fire events. Also see Ch. 18 of the Interagency Standards for Fire and Fire Aviation Operations.

H. Miles City Division Fire Management Group:

This group will be established to provide oversight and recommendations for all interagency fire activities in the Miles City Division. The group will consist of one representative from each agency party to this agreement as designated by Agency Administrators. The group will oversee implementation and updating of this plan. The chairman will be rotated on an annual basis. The goal of this plan is to establish a high trust culture and represent a shared vision of interagency fire program management.

A Chairman will be nominated from the agency for the year shown below.

AGENCY	DATE
BLM	2024
State of Montana	2025
USFS	2026
State of South Dakota	2027
BIA	2028
FWS	2029

This group will set strategic priorities for resources within the Miles City Division and communicate resource needs or availability to the NRCG Eastern Zone MAC group when conditions warrant.

Trigger points to consider include the following:

- Complex Incident Management Team requested or deployed; and/or
- Planning Level 4 and higher; and/or
- Level or extent of resource commitment; and/or
- Lightning Activity Level; and/or
- Higher level MAC is initiated at the NRCG Eastern Zone level.

The BLM Eastern Montana/Dakotas District will establish a designated conference call line for the months of July and August. Outside of this period, the agency that requests the conference call will initiate the conference call line. Notification will be provided to the NRCG Eastern Zone.

I. Unmanned Aircraft Systems (UAS):

The use of drones and UAS aircraft shall follow applicable state and federal regulations, rules, and/or laws including the Federal Aviation Administration (FAA). State and federal agencies using these types of aircraft will coordinate operations in advance and notify respective dispatch centers for potential conflicts with other agency missions. To order UAS, go to <https://uas.nifc.gov/uas-ordering>

J. Incident Traffic Control and Signing:

Incident traffic control and signing is the responsibility of the Protecting Agency and will follow policy and guidance of the Jurisdictional Agency. The State maintains a Memorandum of Understanding (MOU) with the Montana Department of Transportation (MDOT) for traffic control. Requests for MDOT resources will be ordered through the local dispatch center and documented on a resource order.

Refer to the *Miles City Dispatch Emergency Procedures*.

K. Severity:

Upon agreement by both jurisdictional and protecting agencies, severity resources from the Jurisdictional Agency can augment the Protecting Agency resources.

L. LGFF Rates for Wildfire Mobilization and Supplemental Fire Project Agreements:

Reference [Chapter 50 of the Northern Rockies Supplement to the NWCG Standards for Interagency Incident Business Management](#). These rates, while intended for wildland fire mobilization, will also be utilized to determine funding within SFPAs.

VII. BILLING PROCEDURES

- A. See Exhibit D of the Montana Statewide Master Cooperative Wildland Fire Management and Stafford Act Response Agreement (23-FI-11015600-048). The Forest Service, Bureau of Land Management, Bureau of Indian Affairs, National Park Service, and Fish and Wildlife Service will not bill each other for suppression costs. However, pre-suppression costs, fair sharing for interagency dispatch center costs, prevention costs, and other non-suppression costs will be billed in accordance with existing SFPAs.

VIII. GENERAL PROVISIONS

A. Principal Contacts:

Refer to Exhibit B of this Sub-Geographic Area Operating Plan – Principal Contacts.

B. Personnel Policy:

Employees of the Parties to this Sub-Geographic Area Operating Plan shall be subject to the personnel rules, laws, and regulations of their respective agencies unless explicitly provided otherwise, employees of the Parties to this Agreement are considered for all purposes employees of their home agency. Supplemental Fire Department Resources are not applicable in Montana.

C. Modification:

Modifications within the scope of this Sub-Geographic Area Operating Plan shall be made by mutual consent of the Parties, through the issuance of a written modification signed and dated by all Parties prior to any changes being performed. Any Party shall have the right to terminate their participation under this Sub-Geographic Area Operating Plan by providing one-year advance written notice to the other Parties. The Montana Statewide Operating Plan will be reviewed annually for currency and will remain in effect until it is terminated by the mutual consent of all agencies involved or superseded by an updated Montana Statewide Operating Plan. The formal review period for modification(s) will be provided by **March 1**. Agency policy or direction change for any signatory party that affects this agreement would automatically be modified therein.

Modifications that are minor in nature, including changes to principal contact information, etc., will be reviewed annually and concurred to by all Parties; however, new signatures will not be required.

In the interest of efficiency, modifications to the agreement will be distributed electronically for signature. Signatory officials should respond with an electronic signature and date. Once all signatures have been obtained, an electronic version of the modification will be emailed to the principal contacts as listed in Exhibit C of this Sub-Geographic Area Operating Plan.

D. Annual Review:

This Operating Plan is reviewed annually by **March 1st** and revised, as needed.

E. Duration of Operating Plan:

This Operating Plan is executed as of the date of last signature and remains in effect through December 31, 2027 unless modified or superseded.

F. Previous Instruments Superseded:

Exhibit C of the 2017-2023 Montana Master Cooperative Wildland Fire Protection and Stafford Act Response Agreement (USFS #17-FI-11015600-010), (BLM# L17FMA00001), (NPS# F1249170001), and (BIA# 17P00FM0001 / 17C00440901).

G. Authorized Representatives:

By signature below, all signatories to this Sub-Geographic Area Operating Plan certify that the individuals listed in this document are authorized to act in their respective areas for matters related to this Sub-Geographic Area Operating Plan.

X. REVIEW AND SIGNATURES

<p>State of Montana DNRC, Eastern Land Office</p>  <p>Chris Pileski Area Manager</p> <p>6/18/24 Date</p>	<p>State of Montana DNRC, Southern Land Office</p>  <p>Joe Holzwarth Area Manager</p> <p>6/20/24 Date</p>
<p>State of South Dakota Department of Public Safety, Wildland Fire Division</p>  <p>Robert Perry Cabinet Secretary</p> <p>8/1/2024 Date</p>	<p>State of Montana County Eastern Alliance</p>  <p>Ray Ragsdale President</p> <p>6/29/24 Date</p>
<p>BIA, Northern Cheyenne Agency</p> <p>ANDREW WERK Digitally signed by ANDREW WERK Date: 2024.06.14 15:59:27 -06'00'</p> <p>06/14/2024 Date</p> <p>Andrew Werk Agency Superintendent</p>	<p>FWS, Charles M. Russell NWR</p> <p>PAUL SANTAVY Digitally signed by PAUL SANTAVY Date: 2024.06.27 11:52:40 -06'00'</p> <p>Paul Santavy Project Leader</p> <p>Date</p>
<p>BLM, Eastern Montana/Dakotas District</p> <p>WENDY WARREN Digitally signed by WENDY WARREN Date: 2024.06.18 13:45:20 -06'00'</p> <p>Wendy Warren District Manager</p> <p>Date</p>	<p>USFS, Custer Gallatin National Forest</p> <p>KATHLEEN MINOR Digitally signed by KATHLEEN MINOR Date: 2024.05.03 11:07:05 -06'00'</p> <p>KATHY MINOR, Forest Supervisor, USFS, Custer-Gallatin National Forest</p> <p>BETHANY IHLE Digitally signed by BETHANY IHLE Date: 2024.05.03 12:25:54 -05'00'</p> <p>BETH IHLE, Grasslands Supervisor, USFS, Dakota Prairie Grasslands</p> <p>LINDSAY GILMAN Digitally signed by LINDSAY GILMAN Date: 2024.05.03 08:43:23 -07'00'</p> <p>LINDSAY GILMAN, Agreements Specialist USFS, Northern Region</p>

EXHIBIT A: Annual Frequency List for Miles City Dispatch

Refer the Bureau of Land Management's communication plan that includes all agency repeaters.

EXHIBIT B: Principal Contacts

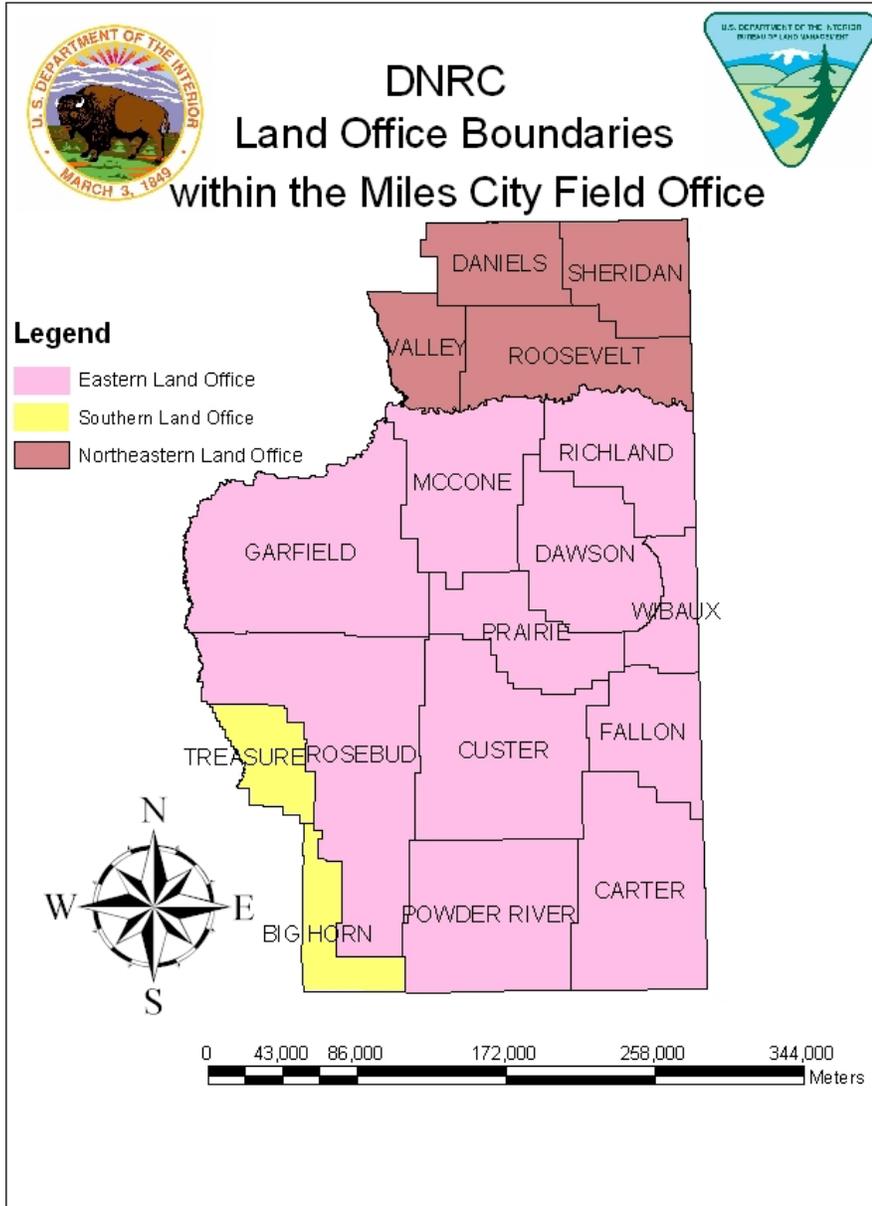
FEDERAL & STATE

<p>State of Montana, DNRC Eastern Land Office Fire Management Officer Randy Sanders 406-233-2904 rasanders@mt.gov</p>	<p>State of Montana, DNRC Southern Land Office Fire Management Officer Jeff Brown 406-247-4406 jbrown8@mt.gov</p>
<p>State of South Dakota Wildland Fire Division Fire Management Officer Cody Griffiee 605-584-2300 cody.griffiee@state.sd.us</p>	<p>BIA, Northern Cheyenne Agency Fire Management Officer Tracy Spang 406-477-8263 tracy.spang@bia.gov</p>
<p>BLM, Eastern Montana/Dakotas District Fire Management Officer Scott McAvoy 406-233-2875 smcavoy@blm.gov</p>	<p>FWS, Charles M. Russell NWR Fire Management Officer James Forsythe 406-538-8706 james_forsythe@fws.gov</p>
<p>USFS, Custer Gallatin National Forest Fire Management Officer Scott Studiner 406-784-2344 scott.studiner@usda.gov</p>	

COUNTY FIRE WARDENS

DNRC – Eastern Land Office			
Carter	Neil Kettelmann	406/775-8743 406/975-8899 (C)	ccso@midrivers.com
Custer	Bud Peterson	406/874-3510 406/853-4623 (C)	custerfire@midrivers.com
Dawson	Brad Sharbono	406/939-1556 (C)	sharbonofarms@yahoo.com
Fallon	Randy Hoenke	406/778-2167 406/978-2167 (C)	hoenke@midrivers.com
Garfield	Ray Hageman	406/557-2341 406/977-9705 (C)	hagemanjvf@midrivers.com
McCone	Jess Beery	406/485-3326 406/939-3318 (C)	jabeery@midrivers.com
Powder River	Ray Ragsdale	406/935-2242 (C)	rayragsgoneropin@yahoo.com
Prairie	Keefer Lewis	406/635-5738 406/852-3309 (C)	sheriff@prairie.mt.gov
Richland	Adam Smith	406/ 480-9244 (C)	trictysal@midrivers.com
Rosebud	Rodney Dresbach	406/346-4270 406/253-0208 (C)	rdresbach@rosebudcounty.com
Wibaux	Brian Nelson	406/796-6543 701/218-0267 (C)	firechief@midrivers.com
DNRC – Southern Land Office			
Big Horn	A.J. Espinosa	406/665-9860 406/679-0516 (C)	
Treasure	Marlow Maehr	406/342-5577 406/679-2223 (C)	

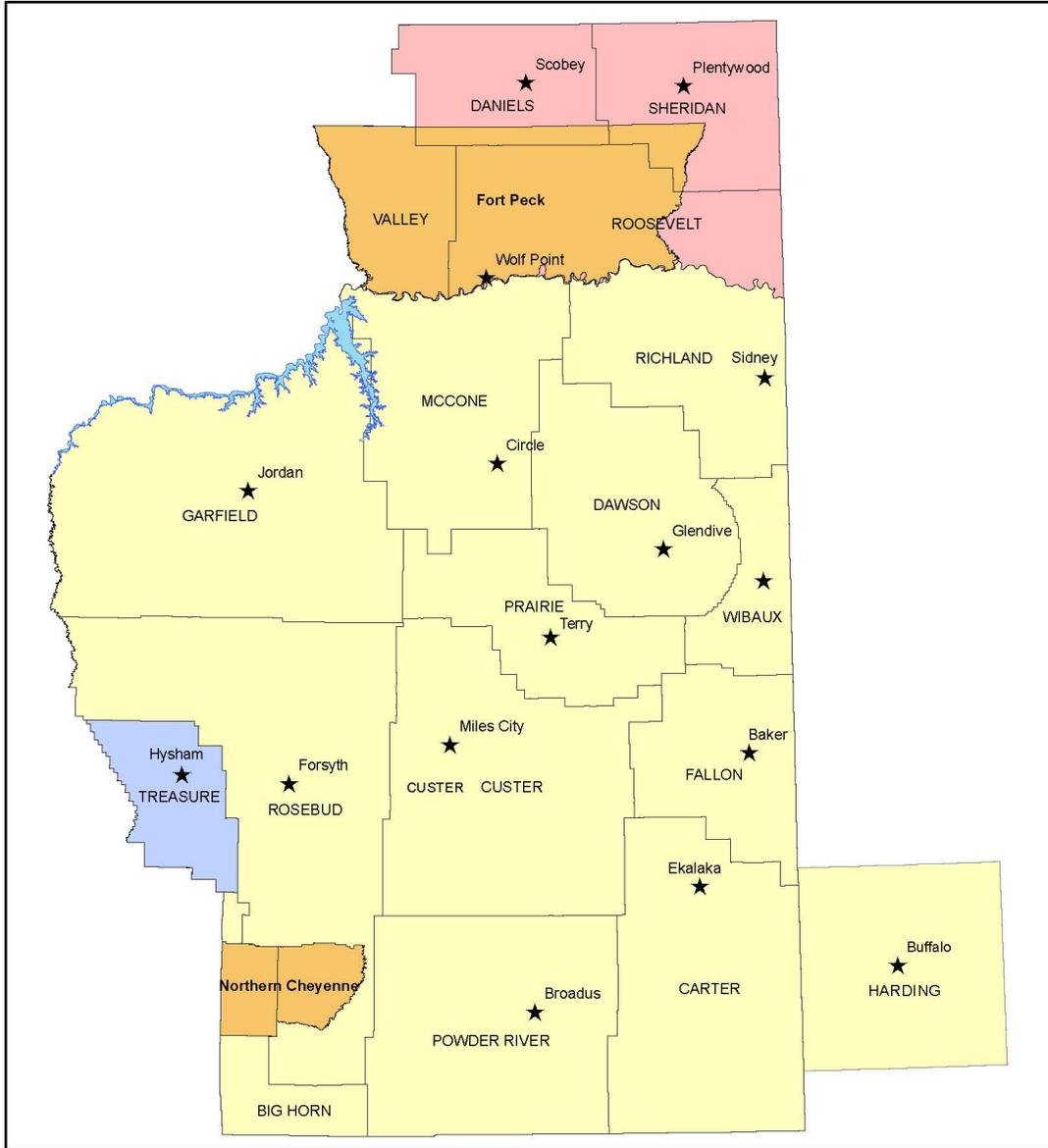
APPENDIX A: DNRC Land Office & County Boundaries



APPENDIX B: Dispatch Boundaries

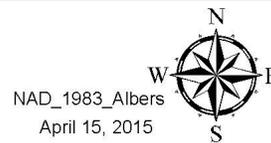
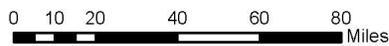


Dispatch Boundaries within the Eastern Montana Fire Zone

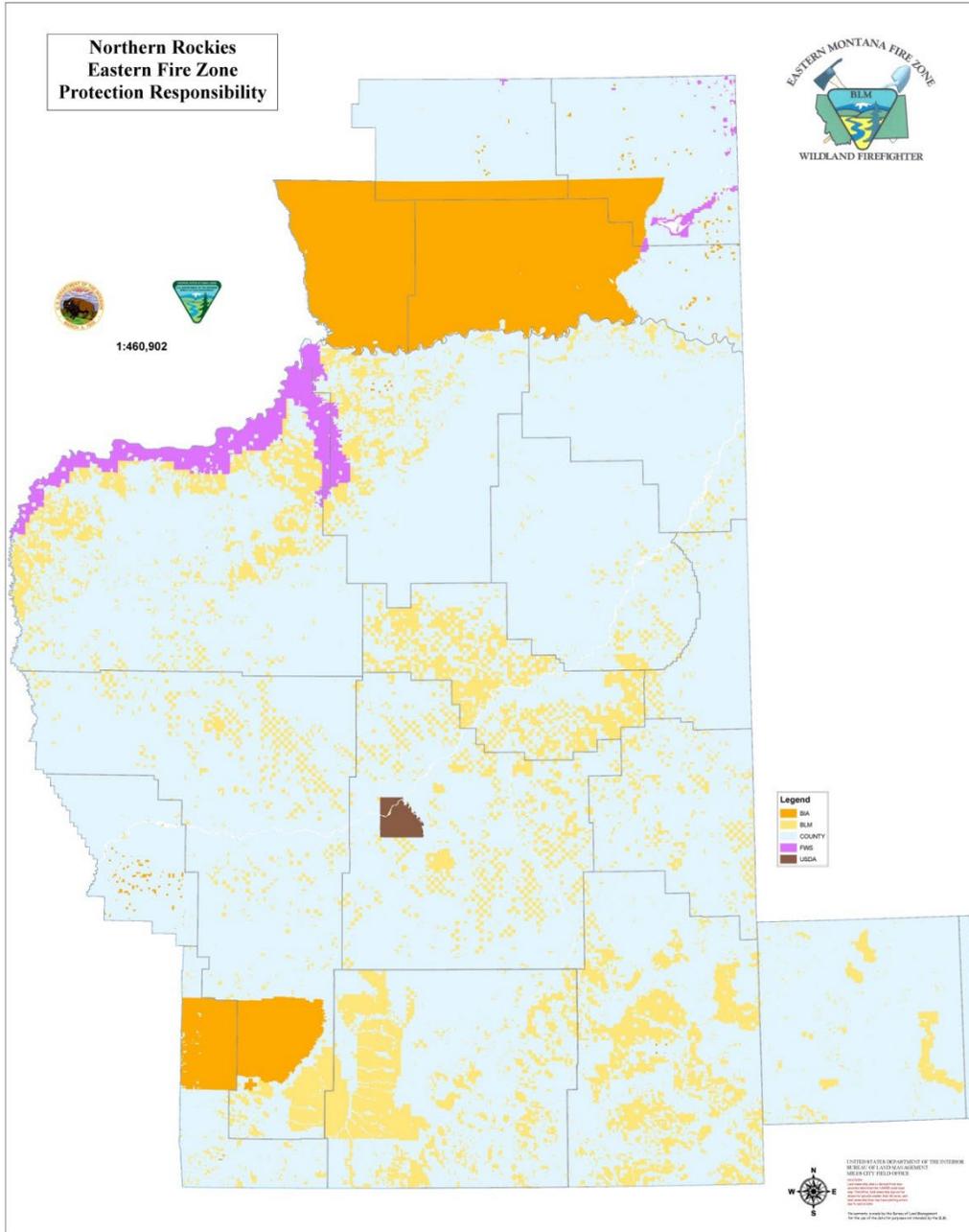


Dispatch Zones

- Billings Dispatch Center (BDC)
- Miles City Dispatch Center (MCC)
- Lewistown Dispatch Center (LEC)
- Bureau of Indian Affairs (BIA)



APPENDIX C: Agency Protection Responsibility



APPENDIX D: FWS Charles M. Russell NWR Addendum

A. INTRODUCTION

Purpose of the Appendix is to provide a basis for cooperative wildland fire management activities between the U. S. Fish and Wildlife Service (FWS) Charles M. Russell (CMR) National Wildlife Refuge (NWR) and the Bureau of Land Management (BLM) Eastern Montana/Dakotas District (EMDD).

B. REPORTING FIRES

1. Fires can be reported to any agency or dispatch office. Whoever takes the report of fire will contact the other agency if the fire is on or threatening the other agency's lands. Following is the list of phone numbers:

Miles City Dispatch Center (MCC)	406-233-2900
CMR Headquarters in Lewistown	406-538-8706
CMR Fort Peck Field Station	406-526-3464

All fires within one mile of the CMR boundary shall be reported to FWS Duty Officer.

C. INITIAL ATTACK

FWS and State lands within the Executive Boundary of the CMR NWR are protected by FWS fire crews located in Sand Creek, Fort Peck and Jordan.

Management Response to wildland fires on the CMR NWR is outlined in the CMR Fire Management Plan. These actions have been reviewed and approved by the FWS Agency Administrator, and are within current FWS policy for wildland fires on Refuge lands. FWS policy directs Agency Administrators to use the Appropriate Management Response on all suppression actions involving refuge lands.

If the fire is on FWS administered lands and is within 1 mile of the boundary, a thorough risk assessment will be conducted including the following:

- Potential for fire to cross the boundary onto adjoining lands,
- Predicted weather,
- Fuel conditions, and
- Current fire activity.

After the assessment is complete, one of the following on scene tactical suppression decisions will be made:

- Use roads or natural fuel breaks and control fire, or

- Minimize the fire size in order to limit firefighter exposures, lower costs and lower the risk of the fire escaping across the boundary.

The FWS objective is always to keep wildfire within refuge boundaries. In all cases, the judicious and prudent use of firefighting resources will be used (i.e. engines and crews). **No mechanical equipment or retardant would be used on FWS administered land without Agency Administrator and/or FWS Duty Officer approval.**

If responding resources deem that retardant is necessary to stop a fire from leaving the CMR, dispatch or Duty Officer will notify the CMR Agency Administrator or Duty Officer of the situation and get approval. If notification cannot be made then the resources shall respond as necessary with continued efforts to notify the CMR.

FWS and BLM FMOs will work closely together to ensure dispatching operations are adequate for both agencies.

The FWS will work with the BLM Jordan Station to provide staffing and an availability list of initial attack resources by 1000 hours every day to the appropriate dispatch center from June 15 to August 31 (this date may be extended dependent upon fire severity).

MCC will be responsible for dispatching FWS resources located at the Jordan field station locally, geographically and nationally. The FWS Duty Officer will status those resources as available in IROC, if not statused as available, then a phone call to the Duty Officer should be made to confirm current status.

The following fire management personnel and the BLM Operational Duty Officer are designated Duty Officers of both agencies and will closely coordinate all activities assuring that all people involved are properly oriented and informed:

FWS Fire Duty Officers:

Jim Forsythe, FMO

Andy Schell, Assistant FMO

APPENDIX E: USFS Custer Gallatin National Forest Addendum

This annual addendum is a working document developed for the purpose of implementing the Cooperative Fire Protection Agreement on a local basis. This plan is specific for those portions of the Custer Gallatin National Forest (CGF) that have fire protection provided by the Eastern Montana/Dakotas District (EMDD) of the Bureau of Land Management (BLM). Included are all the National Forest Lands (NFS) in Montana and South Dakota on the Ashland and Sioux Ranger Districts.

PURPOSE

The CGF is the jurisdictional agency on NFS lands and BLM is the protecting agency. As the protecting agency, BLM is responsible for detecting and providing initial attack response to all wildland fires on NFS on the Ashland and Sioux Ranger Districts. The agencies will utilize a collaborative decision making process to determine the objectives for fire management on CGF lands in accordance with the Custer Gallatin National Forest Land Management Plan and the *Fire Management Plan and Montana Cooperative Fire Agreement*.

WILDFIRE MANAGEMENT

Agency Administrator Expectations

The CGF Agency Administrators will present expectations to Incident Commanders and Fire Management employees at annual meetings each spring and throughout the season as needed; the BLM FMO or Acting will be present at the meeting.

Following each fire season, the Agency Administrators will conduct a year-end review with BLM and CGF fire management personnel. This review will provide each agency an opportunity to evaluate pre-season expectations and provide feedback regarding the season's successes and identify areas that need improvement.

Initial Attack Notification and BLM/FS Duty Officer Communication

Notification of all initial attack activities to the Forest Service Duty Officer will be the responsibility of the BLM Duty Officer on call. This notification will be made within one hour of any new start occurring on Forest Service lands. The Forest Service will provide Miles City Dispatch with a Zone Duty Officer schedule by June 1 each year.

CGF resources will be available to fill the Miles City Division Duty Officer role throughout the fire season.

Staffing and Severity Planning

BLM Fire Management will use current BLM staffing guides and management considerations that ensure adequate levels of staffing commensurate with fire danger and risk. The staffing guides reflect where closest forces are located and their availability during early and late fire season. As the protection agency, the BLM will be responsible for determining the need for severity requests. A copy of Staffing Guides will be provided to the Forest Service.

Natural Resource Mitigations

In accordance with National Forest Resource Management direction (Forest Service Manual 2081.2.10), all suppression actions will minimize the spread of noxious weeds by routine cleaning of agency, contracted and rented equipment at a location that will contain seed removed during cleaning. All contracts for fire management purposes will include a clause in the contract that the equipment is weed free. Known weed infestations areas will be avoided or mitigated if possible when establishing helibases and staging areas.

Fire resources should confine all vehicular travel to existing roadways. If it is necessary to drive off roadways, routes will be used that avoid establishment of new “two-track” travel routes. Roads created will be GPSed or mapped and included in the fire report to the district office. No mechanical equipment (dozers, etc.) will be used on forest service lands without District Ranger, or designated acting, approval.

The District Ranger will provide a Resource Advisor for suppression resources to determine and minimize the impacts of suppression action on the resources.

Prescribed Fire

The CGF will provide MCC a copy of signed burn plans. When a prescribed fire is declared a wildfire, the BLM and CNF will collaborate and manage the suppression response. The jurisdictional agency, with assistance from the protection agency, will assume the lead for development of the WFDSS.

PROJECT WORK

“Supplemental Fire Project Agreement” will be utilized under this agreement when mutually agreed upon projects are to be implemented. This agreement will be completed (fully signed) PRIOR to the incurrence of any costs.

FACILITIES

Both Fort Howes (Ashland Ranger District) and Camp Crook (Sioux Ranger District) have Intergovernmental Orders (IGO) prepared and reviewed annually for the facilities’ agreement. The BLM pays for use of Forest Service facilities based on square footage used and months of occupancy. The Forest Service will annually provide to the BLM a current rate sheet reflecting the basis of the BLM’s assessment for the use of the USFS space.

QUARTERS

As the protection agency, the BLM will be allotted space in the Forest Service bunkhouses and the Forest Service will direct bill BLM employees residing in bunkhouses or USFS housing.

BLM PREPAREDNESS AND USFS FUELS ORGANIZATIONS

The BLM and USFS are committed to providing their respective preparedness and fuels organizations to the Ashland and Sioux Ranger Districts. As budgets expand and contract, the

BLM and USFS will keep each other informed of changes to their organizations prior to each fire season. Both agencies will consider mutually beneficial partnerships and shared portions of their organizations as opportunities arise.

FIREFIGHTER SAFETY HAZARDS

Radiation Exposure Areas of Concern

There are areas of elevated radioactivity associated with abandoned uranium or coal mines within the Eastern Montana Fire Zone that pose a threat to human health. Fire-fighting activities in these areas could expose firefighters to elevated levels of radiation. Primary exposure concerns for firefighters are inhaling dust generated by firefighting activities, skin contact with coal bearing soils, and ingestion of coal bearing soils during hand-to-mouth activity.

Some naturally occurring coal-seams in South Dakota, North Dakota and Montana, contain elevated levels of radioactive materials as well as other constituents of concern (arsenic, molybdenum, thorium, etc.). In some cases, historic uranium mining within these coal seams has further distributed and exposed these hazards. These areas include, but are not limited to, US Forest Service administered lands in Harding County South Dakota in the following areas: North Cave Hills, South Cave Hills and the Slim Buttes.

For specific direction for field-going personnel, please refer to the “Radiation Action Plan IA Pack” and associated maps. For overview, please refer to “Responding to Wildland Fires in or Near Radioactive Locations” located in Chapter 7 of the Red Book. All materials are posted in the Miles City Dispatch Center and available at the Custer Gallatin National Forest's Sioux Ranger District in Camp Crook, SD. Miles City Dispatch Safety Management website: http://www.blm.gov/mt/st/en/fo/miles_city_field_office/fire/safety.html

Erionite

Erionite is a naturally occurring mineral associated with volcanic ash altered by weathering and groundwater. Erionite is often termed an “asbestos-like mineral” due to its fibrous nature and needle-like structure. Erionite fibers are microscopic in scale and not possible to see without magnification.

On the Sioux District of the Custer Gallatin National Forest, geologic formations which have been analyzed and determined to contain erionite mineralogy include the Arikaree and White River (including the Brule and Chadron Members) Formations. All land units within the Sioux District with the exception of the North and South Cave Hills contain these geologic formations and their associated erionite.

Erionite is classified as a Class I Carcinogenic Agent. Erionite fibers, just like asbestos, when inhaled can become lodged in the linings of the lungs, heart, and abdomen and cause cancer. Many researchers have indicated that it is more dangerous than the 6 regulated forms of asbestos. Cancer development is associated with early (childhood and young adult) exposure. Currently, there is no Federal or State regulatory oversight related to the use of erionite.

The Custer Gallatin National Forest has developed a general information PowerPoint presentation, a “Worker Right to Know” letter, a “Photo Guide to Erionite vs. Non-Erionite Bearing Rocks” and a map of the affected geologic formations on the Sioux District to assist field-going personnel with identification of areas with erionite potential. These materials are posted in the Miles City Dispatch Center and at the Sioux Ranger District in Camp Crook, SD.

APPENDIX F: Harding County, South Dakota Addendum

The following protocol shall govern the fire suppression on lands in Harding County, South Dakota under the State of South Dakota, Division of Wildland Fire, within the Miles City Division.

MCC will dispatch Harding County Volunteer Fire Department resources off-district.

When Harding County VFDs assist in suppression of fires on Forest Service and BLM lands within Harding County and the Eastern Montana Fire Zone, the State of South Dakota will pay the Harding County VFDs. The State of South Dakota will in turn send a bill for reimbursement to the BLM.

The State of South Dakota will reimburse the Harding County VFDs for fire suppression on State and privately owned “forested” lands within South Dakota.

However, when a South Dakota VFD responds to a local fire on private, state, or federal property on state or federal jurisdiction, within that VFD’s area of primary responsibility or an adjacent area, the State will not pay for such fire suppression costs unless the initial attack effort extends for more than three hours. When the initial attack becomes compensable after three hours, payment is from time of dispatch to the time of release as noted by times on the crew time report.

MCC will manage the extended and expanded dispatch for the State of South Dakota in Harding County.

The State of South Dakota will train and support all Harding County VFDs and provide MCC with copies of red cards for Harding County VFD fire personnel.

APPENDIX G: BLM Eastern Montana/Dakotas Addendum

Guidance for suppression strategies and tactics in sage-grouse habitat on BLM lands

Conservation and protection of sage-grouse habitat is important to the overall goals of the Eastern Montana/Dakotas District. The management and conservation of sage-grouse habitat, as a priority, will be addressed in incident objectives and resource allocation. Although conservation and protection of sage-grouse habitat and sagebrush steppe is one of the District's primary objectives, it should never supplant firefighter and public safety as our top priority.

BLM's goal is to: *Sustain or reestablish the integrity of the sagebrush biome to provide the amount, continuity, and quality of habitat that is necessary to maintain sustainable populations of sage-grouse and other sagebrush-dependent wildlife species.*

To accomplish this goal fires in Sagebrush Plant Communities will use strategies and tactics that are low impact and less aggressive. Suppression efforts should include:

- Actions outside Sagebrush communities to contain a wildland fire before it enters the Sagebrush community.
- Use of retardant and foaming/gel agents by aerial and ground resources to pre-treat a community edge for the advancing fire front if can be done safely.
- Tying fires into already established barriers (i.e. roads, rocky breaks, water sources, agricultural fields, etc.) rather than creating new containment barriers that may fragment the community.
- Limited use of heavy mechanized equipment in these community types to prevent fragmentation and disturbance.
- Limited the use of backfires in these community types, unless safety and protection of property is in jeopardy.

BLM will adhere to direction and guidance provided in Secretarial Order 3336, and all subsequent updates and Instructional Memoranda issued to which pertains to conservation and management of Sage Grouse Habitat located within the Miles City, South Dakota and North Dakota Field Offices. Refer to each offices Approved Resource Management Plan (RMP) for local direction on Fire Management within these habitat types.

Agency Administrators within the Eastern Montana/Dakotas District

The Eastern Montana/Dakotas District includes the Miles City Field Office, North Dakota Field Office and South Dakota Field Office. The Agency Administrators responsible for BLM administered lands within each Field Office boundary are the Field Managers.

BLM Operation Duty Officer (ODO)

The BLM Operational Duty Officer (ODO) responsibilities may be performed by any individual qualified as an ICT3 or DIVS with a signed delegation of authority from the local Agency Administrator.