



**Bureau of Land Management: Arizona, New Mexico  
Fish and Wildlife Service, Region 2  
Bureau of Indian Affairs: Southwest, Navajo, Western Regions  
National Park Service: Intermountain Region  
U. S. Forest Service, Southwestern Region  
Arizona State Forestry Division  
New Mexico State Forestry**

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Adaptive Management Services  
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Dear Ms. Sova:

This document states the Southwest Geographic Area consolidated position on Incident Management Organization Succession Planning (IMOSP). The Southwest Coordination Group has solicited the comments/opinions from the various agencies and the personnel that make up the Southwest Geographic Area to produce this document.

**Overall:** The consensus view in the Southwest is that the current Incident Management Organization (IMO) model is effective. It is not that the current IMT system is broken regarding on the ground incident management, it's that it cannot be sustained. The first option - Current Situation with Overarching Recommendations was by far the favored alternative. We do not need to re-invent IMTs in its entirety. The current IMT system that has evolved over the last 30 plus years can be refined by addressing those specific areas that need improvement, and developing solutions for those areas. The current already functional structure can be built upon at a fraction of the cost of the other options, and implementation would be expedited as few if any changes to the law would be required.

**1. Any option needs to be budget neutral with no negative impacts to present initial attack capabilities and funding.**

Any option must consider the realities of future federal budgets. With climbing deficits, significant budget increases seem unlikely. Over the past few years' wildland fire budgets have been largely flat or declining. Any option that detracts from initial attack capacities is not supported by the Southwest Area.

**2. Elimination of NIMO.**

NIMO teams in their present state are not interagency entities. They are expensive to set up and maintain. The value of the NIMO concept is yet to be proven. NIMO takes qualified C&G personnel from the existing IMT's and because they do not work at a local level their team members are less connected with local issues and resource management. The consensus opinion in the Southwest Area is to eliminate NIMO

### **3. Team Typing.**

The Southwest GACG was split on this concept. Good arguments were made by both those for typing and those for consolidation. Most agreed that a standard team size of 27 can work where additional positions and resources can be filled as needed dependent on the complexity of the incident. The elimination of team typing would affect position task books, training, qualification standards, and more. How incident complexity is now evaluated and described would also have to be revised.

### **4. Continue to supervise teams by geographic area on a geographic/national rotation.**

The present system of governance works well. The GACGs need to retain control of their respective teams. It is important to the agencies/units of the Southwest Area that the local teams be responsive to the needs of our local areas first. A local team ensures a higher level of familiarity with local fuel types, management issues, politics etc... then one from out of GACG. The national rotation triggered by scarcity and maintained by NICC to supply teams when local capacity is exhausted works well and should be continued. The Southwest Area supports the under taking of an Interagency analysis to determine or validate the number and location of teams needed.

### **5. Promote the development and use of Zone Type 3 Incident Management Teams.**

The Southwest GACG supports expanded use of Type 3 Teams. The Type 3 teams mobilize quickly and provide a local less expensive alternative in fire management. It should be an option and used when appropriate. Participation on Type 3 teams is also a component in developing higher qualifications.

### **6. Continue to use personnel from federal agencies, state and local fire departments to fill team rosters.**

A healthy federal "militia" should be retained and encouraged to participate at all levels/positions of the IMTs. The continued participation of state and local fire departments is also desirable.

### **7. No role for Type 2 Contract Teams.**

There is no place for contract teams in the IMT matrix. Incident management is a true role of government. Turning this function over to a contract organization is abdicating governments' proper role. This is a huge watch out. Turning over incident management could put us in a state of operations much like the present health care HMO situation. Even with contractual sideboards, a commercial organization has far different priorities and goals.

### **8. Continue to use AD's to fill team rosters.**

The use of AD hires to supplement team positions should continue but not at the expense of developing qualified agency individuals. Nationally or at the GACG level criteria needs to be developed that limits the percent of ADs in C&G and favors the use of agency people.

### **9. Establish formal processes for identifying position shortages and create accelerated paths to higher ICS qualifications for qualifying employees.**

Not all ICS positions have shortages, but those positions with scarcity need special attention. The Southwest Area supports the concept of recognition of prior learning for non-operations positions such as finance, logistics, etc. Individuals with the skills in those areas could be tested and fast tracked

into higher positions based on their work/life experience. NWCG standards would be maintained and competent individuals could be used to fill ICS positions quicker if such a system were adopted. Utilizing IQCS and/or merging with IQS should also be looked at as a possible position tracking tool.

**10. Develop modules (Finance, Plans, Logistics) and utilize existing service centers to bolster capabilities**

The Southwest GACG supports the module concept. The modules can effectively create small cohesive teams of functional experts and fill the void in those areas plagued by position vacancy. Technology exists that make it feasible for specialists to services several incidents from an office or central location. It is preferred to have support services on site at the incident when possible. That optimizes work flow and accountability. A caution with any centralization is the further removed generally the less responsive the service.

**11. Provide incentives for organizations, managers and employees that participate on IMTs.**

There is little incentive for line managers to promote IMT participation under the present system. To attract management support, provide funding incentives for IMT involvement. At a minimal organizations' should have the ability to charge base 8's to fires, to compensate managers that provide individuals for the IMT's. Another incentive could be a mechanism where line officers can back fill behind an IMT participant during an active season and charge travel/costs off to a suppression account. Some form of target release/reduction for offices that support IMTs and provide manpower during active fire years should be considered.

**12. Agency quota for IMT participation; performance element in EPAPs**

Once the exact number of IMTs is established each agency should be given a quota for the number of IMT positions each is expected to fill nationally. Agencies can then negotiate how many per GACG each can accommodate. Performance measures should be included into fire funded personnel's EPAPs that direct IMT participation. Employee career paths should be incentivized to enable easier and quicker transition to new qualification requirements. Measures to ensure employee accountability also need to be set in place. There is a large investment from the agencies to train employees. Level of training should correspond to a level of participation.

**13. Establish Liaison Officer as an IMT position**

This has been a useful position to SW IMTs especially during both type 1 and 2 incidents.

Sincerely,

*/s/ Leon W. Ben, Jr.*

Leon W. Ben, Jr.  
Chair, Southwest Coordinating Group