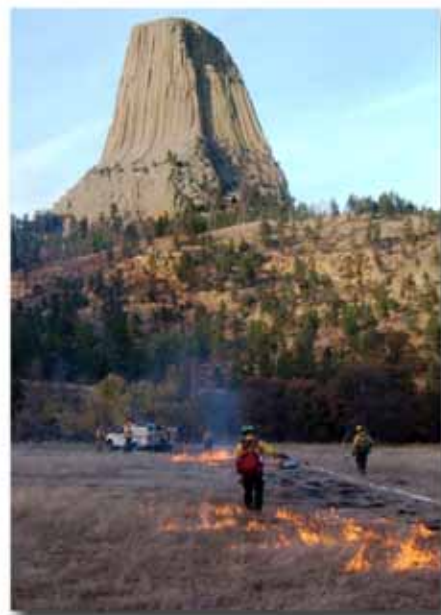




Interagency Prescribed Fire

Planning and Implementation Procedures Guide



PRESCRIBED FIRE PLAN	
ADMINISTRATIVE UNIT(S):	_____
PRESCRIBED FIRE NAME:	_____
PREPARED BY: _____	DATE: _____
Name & Qualification Currency	
TECHNICAL REVIEW BY: _____	DATE: _____
Name & Qualification Currency	
COMPLEXITY RATING: _____	
MINIMUM RNB REQUIREMENT: _____	
APPROVED BY: _____	DATE: _____
Agency Administrator	



July 2008

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Foreword

Interagency Prescribed Fire Planning and Implementation Procedures Guide (2008 Guide) provides standardized procedures, specifically associated with the planning and implementation of prescribed fire. These procedures meet all policy requirements described in the 2003 *Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy*. The 2008 Guide provides unified direction and guidance for prescribed fire planning and implementation for the Department of the Interior's Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), the National Park Service (NPS), the United States Fish and Wildlife Service (USFWS) and the United States Department of Agriculture Forest Service (USDA FS) as well as National Wildfire Coordinating Group (NWCG) partners the National Association of State Foresters (NASF) and the United States Fire Administration (USFA).

Prior to implementing Prescribed Fire under the standards in the 2008 Guide, local units must have ensured compliance with National Environmental Policy Act (NEPA), National Historical Preservation Act (NHPA) and Endangered Species Act (ESA) requirements.

This 2008 Guide meets requirements of Interagency Fire Directorate task to develop common language and unified direction or guidance for agency/bureau manuals, directive handbooks, and guidelines to complete final implementation of this policy.




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Executive Summary

Fire is an essential ecological process in many fire dependent ecosystems. In large areas of the country, fire exclusion from these ecosystems has led to unhealthy forest, woodland and rangeland conditions. These areas are at risk of intense, severe wildfires that threaten communities and cause significant damage to key ecological components.

As one component of fire management, prescribed fire is used to alter, maintain, or restore vegetative communities; achieve desired resource conditions; and to protect life, property, and values that would be degraded and/or destroyed by wildfire.

Federal Prescribed Fire Programs are guided by the principles of the 1995 Federal Wildland Fire Management Policy and Program Review and the 2001 update. Collectively these principles establish that wildfire suppression, wildland fire use, and prescribed fire programs be implemented equally, consistently and concurrently, as a means to avoid fire risks. The policy emphasizes firefighter safety as a consideration in planning and a priority in operations (Wildland Fire Management Policy, June, 2003).

This guide supports the Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy. It provides unified direction and guidance for prescribed fire planning and implementation for the Department of the Interior's Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), the National Park Service (NPS), the United States Fish and Wildlife Service (USFWS) and the United States Department of Agriculture Forest Service (USDA FS).

This guide partially replaces the original Wildland and Prescribed Fire Management Policy Implementation Procedures and Reference Guide (USDI/ USDA 1998)¹ which established consistent agreement between agencies regarding federal policy direction related to prescribed fire planning and implementation.

¹ Other documents that replace this 1998 document are the *Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy*, June 20, 2003 and *Wildland Fire Use Implementation Procedures Reference Guide*, May 2005

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Introduction

Purpose

The purpose of this guide is to provide consistent interagency policy, establish common terms and definitions and identify planning and implementation processes for prescribed fire.

The guide describes what is **minimally** acceptable for prescribed fire planning and implementation. Agencies may choose to provide more restrictive standards and policy direction, but must adhere to these **minimums**.

Scope

This guide provides policy and direction to implement existing federal policy and has been developed with tribal, state, county, and local cooperators in mind. While some of these guidelines will not fit all non-federal cooperators, the intent is to include everyone by establishing a planning and implementation guide that might result in that outcome.

Prescribed Fire Program Goals

Interagency Prescribed Fire Program goals are to:

- Provide for firefighter and public safety as the first priority.
- Ensure that risk management is incorporated into all prescribed fire planning and implementation.
- Use prescribed fire in a safe, carefully planned, and cost-efficient manner.
- Reduce wildfire risk to communities, municipal watersheds and other values and to benefit, protect, maintain, sustain, and enhance natural and cultural resources.
- Utilize prescribed fire to restore natural ecological processes and functions, and to achieve land management objectives.

Authorities

All use of prescribed fire will be supported by a Land/Resource Management Plan (L/RMP) and/or Fire Management Plans (FMP). Prescribed fire projects can only be implemented through an approved Prescribed Fire Plan. Specific authorities exist for each agency to utilize prescribed fire (See Appendix A). All

project decisions to use prescribed fire are subject to the agency's analysis, documentation, and disclosure requirements for complying with the National Environmental Policy Act (NEPA).

During prescribed fire planning and operations, all federal agencies will accept each other's standards for qualifications. The minimum qualifications standard is National Wildland Fire Coordinating Group (NWCG) Wildland and Prescribed Fire Qualifications System Guide, 2000 (PMS 310-1). State, local cooperators and contractors working on federal agency prescribed fires must meet the NWCG PMS 310-1 standards unless local agreements or contracts specify otherwise.

The main reference glossary for this guide is the NWCG glossary, which is updated periodically: <http://www.nwcg.gov/>.

This guide is not intended to address interagency business rules. Reference individual agency's business rules for direction.

Prescribed Fire Planning Process

Common planning documents to ensure quality prescribed fire plans include:

Land/Resource Management Plan (L/RMP)

Overall direction is provided to the Wildland Fire Management Program by Land/Resource Management Plans (L/RMP). These plans serve as the document to initiate, analyze, and provide the basis for using prescribed fire to meet resource management objectives.

Fire Management Plan (FMP)

All burnable acres will be covered by a Fire Management Plan (FMP). The FMP is the cornerstone plan for managing a Wildland Fire Management Program and should flow directly from the L/RMP. FMPs may be developed for a Fire Planning Unit (FPU) that crosses jurisdictional boundaries. Where the Wildland Fire Management Program crosses jurisdictional boundaries, or where

program coordination is essential, the FMP will require interagency coordination. Most FMPs are anticipated to fall into this category.

National Environmental Policy Act (NEPA)

Resource and prescribed fire objectives for specific prescribed fire projects are derived from the NEPA analysis. **The entire prescribed fire project area must be analyzed under NEPA.** NEPA documents that identify and analyze the effects of using or not using prescribed fire treatment projects may include

Environmental Impact Statements (EIS), Environmental Assessments (EA), and Categorical Exclusion (CE).

Other authorities that may be utilized to guide analysis and determination of NEPA compliance are Healthy Forest Restoration Act (HFRA), Healthy Forest Initiative (HFI), and the Tribal Forest Protection Act (TFPA).

Prescribed fire planning and related NEPA analysis should always occur at the largest possible spatial and temporal scales.

Implementation Organization and Qualifications

During prescribed fire planning and operations, all federal agencies will accept each other's standards for qualifications. The minimum qualifications standard is National Wildland Fire Coordinating Group (NWCG) Wildland and Prescribed Fire Qualifications System Guide, (PMS 310-1). State, local cooperators and contractors working on federal agency prescribed fires must meet the NWCG PMS 310-1 standards unless local agreements specify

otherwise. No less than the organization described in the approved Prescribed Fire Plan may be used for implementation. The complexity of each prescribed fire or phase of fire(s) determines the organization(s) needed to safely achieve the objectives specified in the Prescribed Fire Plan.

Minimum Supervisory Qualifications determined by prescribed fire complexity:

Table 1. Qualifications requirements related to Prescribed Fire Complexity.

Position	Complexity		
	High	Moderate-Low	Low
RXM1	Optional	Optional	Optional
RXM2	Not Allowed	Optional	Optional
RXB1	Required	Optional	Optional
RXB2	Not Allowed	Required	Optional
RXB3	Not Allowed	Not Allowed	Required
FIRB	Optional	Optional	Optional
Holding Specialist: Holding functions will be managed by personnel qualified at the appropriate ICS wildland fire operations position as required by complexity, assigned resources and operational span of control. For some projects, there may be no holding requirements or the holding duties are assumed by the Burn Boss.			

High, Moderate, and Low complexity prescribed fires are determined through the required NWCG Prescribed Fire Complexity Rating System Guide.

Prescribed Fire Burn Boss Type 3 (RXB3):

An RXB3 will only be allowed to implement low complexity prescribed fires where the final complexity is rated low.

The requirements for Prescribed Fire Burn Boss Type 3 are:

Table 2: Requirements for Prescribed Fire Burn Boss Type 3

Training:	Required: S-290 Intermediate Wildland Fire Behavior Suggested: S-234 Ignition Operations
Prerequisite Experience:	Incident Commander, Type 5 OR Advanced Firefighter/Squad Boss AND Satisfactory position performance as a Prescribed Fire Burn Boss Type 3
Physical Fitness:	Moderate
Other Position Assignments that will Maintain Currency:	Prescribed Fire Burn Boss Type 2 Prescribed Fire Burn Boss Type 1 Fire Use Manager Type 1 Fire Use Manager Type 2 Prescribed Fire Manager Type 1 Prescribed Fire Manager Type 2

Responsibilities

Prior to prescribed fire implementation, thorough planning and review processes must be conducted. All prescribed fire actions must be developed from resource/fire management objectives carried forward from FMP's and/or L/RMP's. A specific implementation plan for each prescribed fire must be completed, reviewed, and approved before ignition can begin.

The Agency Administrator has final approval authority for all Prescribed Fire Plans, unless special circumstances warrant higher review and concurrence (such as may occur during higher Preparedness Levels or for extremely large, complex projects). Although the Agency Administrator has final approval authority for the Prescribed Fire Plan and the Agency Administrator "GO/NO-GO" checklist, the Prescribed Fire Burn Boss has the responsibility to make the on-site tactical "GO/NO-GO" decision. The Prescribed Fire Burn Boss ensures that all prescription, staffing, equipment, and other plan specifications are met before, during, and after the prescribed fire.

Every Prescribed Fire Plan must receive a technical review. The Technical Reviewer and Prescribed Fire Plan Preparer must be qualified or have been previously qualified as a Prescribed Fire Burn Boss at an experience level equal to or higher than the complexity being reviewed. **Either the Prescribed Fire Plan Preparer or Technical Reviewer must be currently qualified, less physical fitness requirement.**

Only a RXB1 can review plans at high complexity. An RXB2 can review plans of moderate to low complexity. An RXB3 is allowed to function as a Prescribed Fire Plan Preparer for a low complexity plan, but not a Technical Reviewer.

Agency or individual unit policy may dictate additional reviews. Interagency Prescribed Fire Plans require approval from all appropriate Agency Administrators and a technical review. Listed below are the prescribed fire and implementation position roles and responsibilities:

Agency Administrator

For the purposes of this document, the Agency Administrator is defined as the Line Officer (or designee) of the agency or jurisdiction that has responsibility for the prescribed fire. These usually include the: NPS Park Superintendent, BIA Agency Superintendent, USFS Forest Supervisor/District Ranger, BLM District/Field Office Manager, FWS Project Leader and/or Refuge Manager, State Forest Officer, and/or Fire Chief.

The Agency Administrator is responsible to:

1. Approve Prescribed Fire Plans. When approving a plan, understand the risks associated with it. Ensure that the plan has been reviewed and recommended for approval by the Technical Reviewer who was not the primary preparer of the plan.
2. Ensure that only trained and qualified personnel participate in the implementation portion of the prescribed fire.
3. Ensure that projects are monitored, evaluated, and documented in the project file.
4. Sign, date, and provide an expiration date for the approval to burn on the Agency Administrator GO/NO-GO Checklist (Reference Burn Plan Template, Appendix B).
5. Understand and approve the Complexity Analysis (PMS 424).
6. Ensure that all prescribed fires are conducted in accordance with the approved implementation plan and established standards and guidelines.
7. Ensure that periodic reviews and inspections of the Prescribed Fire Program are completed.
8. Determine if and when the Agency Administrator is to be notified that contingency actions are being taken.
9. Report all wildfires resulting from prescribed fires through the chain of command.

-
10. Declare a prescribed fire a wildfire (if necessary and if responsibility is assigned in the plan).
 11. Ensure that prescribed fires declared as wildfires are reviewed according to established guidelines.
 12. Ensure that prescribed fires which receive a National Ambient Air Quality Standards (NAAQS) Notice of Violation (NOV) are reviewed according to established guidelines

Technical Reviewer

The Technical Reviewer is responsible for reviewing each Prescribed Fire Plan element for content as well as evaluating the risk and Complexity Analysis to ensure that the stated goals and objectives can be safely and successfully achieved when properly implemented. The Technical Reviewer shall be qualified or previously qualified as a Burn Boss at or above the level of project complexity. At a minimum, NWCG qualifications will be accepted. The Technical Reviewer should have local knowledge of the area, experience burning in similar fuel types, and/or conduct an on-site review. **The Technical Reviewer must be someone other than the primary preparer of the plan.** An off-unit technical review is encouraged to provide an additional independent perspective. It is acceptable for other specialists to review certain portions of the plan however; a primary Technical Reviewer must be designated as technical review signatory. For example, a fire behavior analyst may review the fire behavior calculations; the aviation manager may review the air operations plan; and/or a resource specialist may review impacts to their resource of interests. It is recommended that at least once every year, each unit should send a moderate or high complexity Prescribed Fire Plan off-unit for technical review.

The Technical Reviewer is responsible to:

1. Ensure that Prescribed Fire Plans meet agency policy and direction.
2. Ensure that the Complexity Analysis accurately represents the project, so the Agency Administrator understands the identified risks and the mitigating measures enacted. This may require on-site review in Wildland Urban Interface

(WUI) or high complexity situations by the Technical Reviewer.

3. Check the prescription parameters against the fuel types to ensure that the project as planned has a reasonable chance of meeting the resource management objectives.
4. Ensure that the fire behavior calculations and/or prescription parameters are appropriate and within the acceptable range.
5. Ensure that the ignition, holding and contingency plans are consistent with the predicted fire behavior.
6. Complete and sign the Technical Review Checklist (See Burn Plan Template, Appendix B) and the Prescribed Fire Plan signature page.

Prescribed Fire Plan Preparer

For the purpose of this document, the Prescribed Fire Plan Preparer is defined as the individual responsible for the preparation of the Prescribed Fire Plan. Several people may be involved in the preparation of the Prescribed Fire Plan, but the Prescribed Fire Plan Preparer is responsible for the final plan content. The primary preparer of the Prescribed Fire Plan will sign the signature page.

The preparer is responsible to:

1. Prepare the Prescribed Fire Plan in accordance with this guide's policy and direction.
2. Coordinate with the resource management and/or technical specialists to ensure that the plan meets management and operational objectives.
3. Interact with the Technical Reviewer to ensure that all plan elements are adequately addressed.
4. Complete and sign the Complexity Analysis.

Prescribed Fire Burn Boss (RXB1/RXB2/RXB3)

The Prescribed Fire Burn Boss is responsible to the Agency Administrator, Prescribed Fire Manager, or FMO/local fire management

organization for implementing the Prescribed Fire Plan.

The Prescribed Fire Burn Boss is responsible to:

1. Review the Prescribed Fire Plan prior to implementation and ensure all required elements and objectives are addressed.
2. Inspect the burn unit to validate Prescribed Fire Plan elements including areas of special concern as well ensuring that holding/contingency plans adequately address expected fire behavior outside the unit(s).
3. Obtain current weather and smoke management forecasts, updates, and special advisories from a meteorologist.
4. Maintain communication with the Agency Administrator, Prescribed Fire Manager, or FMO/local fire management organization.
5. Ensure that the Agency Administrator GO/NO-GO Checklist is valid (See Burn Plan Template, Appendix B)
6. Take to the field those portions of the Prescribed Fire Plan necessary for completing the briefing and safe project implementation.
7. Complete and sign the Prescribed Fire GO/NO-GO Checklist (See Burn Plan Template, Appendix B).
8. Ensure availability of any contingency resources and management of those resources if deployed.
9. Ensure that all operations are conducted in a safe manner and in accordance with the approved plan and established standards and guidelines.
10. Verify qualifications of all assigned personnel. Conduct the personnel/safety briefing to ensure a safe operation.
11. Conduct the test fire and document the results.
12. Supervise assigned personnel and direct the ignition, holding and monitoring operations. The Prescribed Fire Burn Boss will be responsible for implementation including mop-up and patrol unless otherwise assigned to other qualified personnel.
13. Declare the prescribed fire out unless the responsibility for it is formally passed to

another Prescribed Fire Burn Boss, Prescribed Fire Manager or the local fire management organization.

14. Determine when the prescribed fire is not within prescription parameters (both short and long term) or is not meeting objectives.
15. Declare a prescribed fire a wildfire (if necessary and if responsibility is assigned in the plan).
16. Manage the incident or oversee the transition to another Incident Commander if an escape occurs.
17. Ensure that reports are completed.
18. Coordinate with adjacent landowners, cooperators and permittees as designated in the Prescribed Fire Plan.

Fire Management Officer (FMO)/ Fire Program Manager

The Fire Management Officer (FMO)/Fire Program Manager is responsible to the Agency Administrator for planning, implementing and monitoring of the Prescribed Fire Program in accordance with policy and direction.

The FMO/Fire Program Manager is responsible to:

1. Ensure compliance with National, Regional, tribal and local fire policy and direction, as well as applicable state and local laws.
2. Ensure that Preparedness Level Restrictions are followed. At National Preparedness Levels Four and Five, prescribed fire implementation is restricted. See the National Interagency Mobilization Guide for details.
3. Ensure that both the Prescribed Fire Plan Preparer and the Technical Reviewer are qualified or qualified less currency at the level of complexity or higher.
4. Ensure that trained and qualified personnel are available to participate in the Prescribed Fire Program.
5. Assign the Prescribed Fire Burn Boss.
6. Ensure a Prescribed Fire Plan with written approval exists for each prescribed fire project.

-
7. Review the Prescribed Fire Plan to assess the impact of the project on the unit's workload; include the project in the unit's Annual Work Plan; assess the unit's ability to implement the project; and assess the need for additional implementation resources.
 8. Ensure that all prescribed fires are conducted in accordance with the approved Prescribed Fire Plan and established standards and guidelines.
 9. Declare a prescribed fire a wildfire (if necessary and if responsibility is assigned in the plan).
 10. Act as liaison/coordinator to the Agency Administrator, Prescribed Fire Manager and/or Prescribed Fire Burn Boss, local dispatch office, other units, other agencies, air quality authorities, news media, transportation agencies, and safety officials.
 11. Ensure that projects are reported through the local office and comply with national reporting guidelines.
 12. Ensure that fuels management prescribed fire projects and interagency support actions are reported through the proper reporting systems.
 13. Ensure that periodic reviews and inspections of the Prescribed Fire Program are completed.
 14. Update Agency Administrator on the progress of the prescribed fire (as necessary).
 15. Ensure that projects are monitored, evaluated and documented as a part of the project file.

Prescribed Fire Manager (RXM1/RXM2)

The Prescribed Fire Manager is responsible for implementing and coordinating assigned prescribed fire activities. A Prescribed Fire Manager may be assigned during periods when multiple simultaneous prescribed fires are being conducted; when multiple prescribed fires will be conducted within a short time frame; or where there is complex interagency involvement.

The Prescribed Fire Manager is responsible to:

1. Review Prescribed Fire Plans prior to implementation.
2. Monitor all prescribed fire operations.
3. Ensure that all operations are conducted in a safe manner and in accordance with the approved plan(s) and established standards and guidelines.
4. Act as coordinator/liaison between the burn organization(s) and other offices, agencies, air quality authorities, news media, transportation agencies, safety officials, and interested public.
5. Declare a prescribed fire a wildfire (if necessary and if responsibility is assigned in the plan).
6. Obtain and interpret long-term weather information.
7. Brief the Burn Bosses and direct operational assignments according to policies, priorities and standards.
8. Set priorities for allocation of resources.
9. Ensure the completion of all required documentation including the evaluation and documentation of accomplishments, fire behavior and fire effects, operation procedures, and cost summaries.

Firing Boss (FIRB)

The Firing Boss reports to the Prescribed Fire Burn Boss and is responsible for supervising and directing ground and/or aerial ignition operations according to established standards in the Prescribed Fire Plan.

The Firing Boss is responsible to:

1. Review the Prescribed Fire Plan and the burn unit prior to implementation.
2. Brief personnel on project objectives and ignition operations.
3. Complete the test fire according to the ignition plan at the direction of the Prescribed Fire Burn Boss.
4. Conduct ignition operations in a safe manner according to the ignition plan.
5. Identify the impacts of ignition on the control and desired fire effects.
6. Coordinate ignition operations with the Holding Specialist.

Firing Boss is not a mandatory position for any prescribed fire. Ignition operations may be managed by personnel qualified at the appropriate Incident Command System (ICS) wildland fire operations standard and as required by the prescribed fire complexity, assigned resources, and operational span of control.

Holding Specialist

The supervisory position in charge of the holding forces reports to the Prescribed Fire Burn Boss. There is no specific NWCG approved prescribed fire position for this function. This position is assigned by name and title using PMS 310-1 mnemonics. Holding functions will be managed by personnel qualified at the appropriate Incident Command System (ICS) wildland fire operations standard and as required by the prescribed fire complexity, assigned resources, and operational span of control.

The Holding Specialist is responsible to:

1. Review the Prescribed Fire Plan and the burn unit prior to implementation.
2. Brief holding personnel on project objectives and holding operations.
3. Conduct holding operations in a safe manner according to the holding plan.
4. Coordinate holding operations with the Firing Boss.
5. Confine the fire to a predetermined area, mop up, and patrol.
6. Maintain communication with Burn Boss on holding progress and/or problems.

For some prescribed fires, there may be no holding requirements or the holding duties are assumed by the Prescribed Fire Burn Boss.

Fire Effects Monitor (FEMO)

The Fire Effects Monitor (FEMO) is responsible for collecting the onsite weather, fire behavior, and fire effects information needed to assess whether the fire is achieving established resource management objectives.

The FEMO is responsible to:

1. Review the monitoring plan prior to implementation.

2. Monitor, obtain, and record weather data.
3. Monitor and record fire behavior data throughout the burn operations.
4. Recon the burn unit/area assigned.
5. Plot the burn area and perimeter on a map.
6. Monitor and record smoke management information.
7. Monitor first order fire effects.
8. Provide monitoring summary of the fire.
9. Provide fire behavior and weather information to burn personnel as appropriate.

Helitorch Manager (HTMG)

The Helitorch Manager is responsible to manage the helitorch operation, supervise the mixing operation, and provide technical assistance to the Prescribed Fire Burn Boss/Firing Boss (FIRB). The HTMG may also serve as Helicopter Manager and Helitorch Manager or Helicopter Parking Tender (but not both).

Plastic Sphere Dispenser Operator (PLDO)

The Plastic Sphere Dispenser Operator (PLDO) is responsible for the preparation, operation, maintenance, and care of the dispenser. The PLDO reports to the Firing Boss (FIRB).

Helitorch Mixmaster (HTMM)

The Helitorch Mixmaster (HTMM) is responsible for supervising the mixing/filling operations. The HTMM may also serve as Helitorch Manager or Helicopter Manager.

Resource Specialist or Resource Advisor (READ)

The Resource Specialist/READ is responsible for ensuring the prescribed fire project is planned and implemented in a manner supporting the unit's resource management goals and objectives. The Resource Specialist/READ is responsible to the Agency Administrator.

The Resource Specialist/READ is responsible to:

-
1. Ensure resource management representation in the preparation of the Prescribed Fire Plan.
 2. Ensure a review of Prescribed Fire Plans is conducted before each plan is submitted for approval.
 3. Evaluate the prescribed fire project in terms of meeting objectives.
 4. Provide resource information and direction to the Prescribed Fire Burn Boss.
 5. Present information at briefings on resources, priorities, and issues of concern.
 6. Coordinate with adjacent landowners, cooperators and permittees as designated in Prescribed Fire plan or by Burn Boss.

Amendments

There may be a need to make amendments to the Prescribed Fire Plan. These are changes to the Prescribed Fire Plan that require Agency Administrator signature. When changes are necessary, plans must be amended to identify the affected sections; the reason for the change(s); and have the changes clearly identified. For amendments, the need for additional technical review will be determined and justified by the agency administrator.

Common reasons for amending the Prescribed Fire Plan may include:

- Changes to objectives.
- Changes to complexity.
- Changes to fire behavior prescription parameters.
- Changes to project area boundaries resulting in either an increase or decrease in area.
- Reduction in resource capabilities identified as required in the plan.
- Major changes to ignition methods including ground ignition to aerial ignition; aerial ignition to hand ignition; hand drip torch ignition to use of terra torch ignition (includes ATV mounted ignition devices); and/or hand ignition from roadways to hand ignition from boats or other watercraft.

To avoid having to amend the Prescribed Fire Plan, flexibility should be built into the plan that will allow for a range of adjustments during the prescribed fire. When building flexibility, the

range of identified options must remain within the scope of the Complexity Analysis.

Examples of flexibility that can be built into a prescribed fire plan:

- The Prescribed Fire Plan may state that on burn day and subsequent days of the prescribed fire, a mix of the number and kinds of hand crews and engines may be modified as long as stated production capabilities are not compromised.
- As the prescribed fire progresses from ignition to holding to mop up and patrol, specified capabilities and/or types of resources may be adjusted. If these flexibilities are built into the Prescribed Fire Plan, there must be a clear statement as to the work capability requirements of the resources at the various stages of the prescribed fire.
- Minor changes in burn unit boundaries to facilitate holding and/or ignition, as long as the area in question has been in the NEPA document, requires no change in holding or ignition resources and is within the project boundaries.
- Additional resources may be assigned to the project without amending the burn plan if the addition of these resources does not change the complexity of the burn or require additional supervisory positions. These changes must be documented in the daily briefing.

Safety

The Federal Wildland Fire Policy states that firefighter and public safety is first priority. Prescribed Fire Plans and activities must reflect this commitment. Every person involved in a prescribed fire is responsible for identifying safety issues and concerns. It is the responsibility of each individual participating in prescribed fire activities to notify immediate supervisor of any possible misunderstanding of assigned tasks or safety concerns related to the assignment.

NWCG established Work/Rest Guidelines and span of control apply equally to wildland and prescribed fire operations. The management of crew, overhead, and support personnel rest to assure safe, productive fire operations is the responsibility of all supervisory fire management personnel (refer to *NWCG Interagency Incident Business Management Handbook*, PMS 902, NFES 3139).

Exposure to smoke during prescribed fire operations can be a significant safety concern. Research has shown that exposure to smoke on prescribed fires, especially in holding and ignition positions, often exceeds that on wildfire. At a minimum, smoke exposure must be addressed in a job hazard analysis or its equivalent and smoke management element. Public safety impacts from smoke should be addressed in the Smoke Management and Air Quality Element as well as the Public, Personnel Safety, Medical Element.

Transportation and use of any product containing chemicals (drip torch fuel, aviation gas, sphere dispensers, fusees, fuel thickener, etc.) must be in compliance with the Occupational Safety and Health Administration's (OSHA) Hazard Communication Standard (29 CFR 1910.1200) and Department of Transportation Regulations (49 CFR Part 171), and agency specific guidance. Material Safety Data Sheets (MSDS) for hazardous materials used on projects should be consulted in developing the job hazard analysis.

The SAFENET form and process is designed for reporting and correcting unsafe situations and is applicable to prescribed fire applications.

The risk management process identified in the NWCG Incident Response Pocket Guide (IRPG, PMS 410-1) helps ensure that critical factors and risks associated with prescribed fire operations are considered during decision making. This process should be applied to all prescribed fire planning and operations.

Consider using a Safety Officer on high complexity prescribed fires and others where the complexity analysis shows the need or indicates a higher than normal hazard.

A qualified Safety Officer is defined as a currently qualified Safety Officer, at any Type level (Types 1, 2 or 3), as defined by the NWCG, *Wildland and Prescribed Fire Qualification System Guide* (PMS 310-1).

Prescribed Fire Plan

The Prescribed Fire Plan is the site-specific implementation document. It is a legal document that provides the Agency Administrator the information needed to approve the plan and the Prescribed Fire Burn Boss with all the information needed to implement the prescribed fire. Prescribed fire projects must be implemented in compliance with the written plan.

Prescribed Fire Plans will vary in their degree of detail. The size and complexity of the prescribed fire project will determine the level of detail required. The Prescribed Fire Plan Template (Appendix B) must be utilized. Each element must be addressed and then assembled in the sequence identified in the template. Should an element not apply to a specific prescribed fire plan, not applicable (N/A) may be utilized. Programmatic plans for multiple units under like conditions may be appropriate. Additional information may be added as appendices.

If an interagency mixed ownership Prescribed Fire Plan is being prepared, the development of all appropriate elements within the plan will be conducted in an interagency setting. For cooperative burns implemented by non-federal entities involving federal and non-federal lands, where only a small amount of federal lands will be treated, the local agency administrator has discretion to use either a federal or non-federal Prescribed Fire Plan. Interagency agreements and Memorandums of Understanding (MOU) and/or private land owner agreements are required to implement prescribed fire on multiple ownerships.

Listed below are the planning explanations of each individual element required as part of a complete Prescribed Fire Plan and implementation policy related to the element.

Element 1. Signature Page

The following information must be included on the signature page:

1. Administrative unit name.
2. Prescribed Fire Unit (burn unit)/Project name.

3. At a minimum, three dated signatures are required: a Prescribed Fire Plan Preparer, a Technical Reviewer, and an Agency Administrator. Additional signatures may be included as required by the individual unit.
4. Final determined complexity rating(s).
5. If the plan needs to be amended, the signed and dated amendments must be attached to the Prescribed Fire Plan (see Amendments, page 17).

Element 2. GO/NO-GO Checklists

Agency Administrator GO/NO-GO Checklist

The Agency Administrator Pre-Ignition Checklist (Burn Plan Template, Appendix B) is required to be completed. The Agency Administrator's Pre-Ignition Checklist and Approval evaluates whether compliance requirements, Prescribed Fire Plan's elements, and internal and external notification(s) have been completed and expresses the Agency Administrator's intent to implement the Prescribed Fire Plan. The checklist establishes the expiration date for the implementation of the Prescribed Fire Plan. If ignition of the prescribed fire is not initiated prior to expiration date determined by the Agency Administrator, a new approval is required. An 'acting' Agency Administrator may sign the Agency Administrator GO/NO-GO checklist if authority to do so has been delegated. If the Prescribed Fire Plan is amended, a review and re-validation of the Agency Administrator GO/NO-GO Checklist would be required and included in the Project File.

Prescribed Fire GO/NO-GO Checklist

Prior to all ignition operations, the assigned Prescribed Fire Burn Boss will complete and sign the Prescribed Fire GO/NO-GO Checklist (Burn Plan Template, Appendix B). This checklist is a minimum standard and agencies may elect to add questions and/or approval signatures. For each day of active ignition on a prescribed fire, a separate daily GO/NO-GO Checklist is required.

Element 3. Complexity Analysis

Risk management is a foundation for all prescribed fire activities. Risks and uncertainties relating to prescribed fire activities must be understood, analyzed, communicated, and managed as they relate to the cost of either doing or not doing an activity. At a minimum, those risks from the Complexity Analysis that are rated high and cannot be mitigated will be identified with a discussion of the risks associated in the Summary Complexity Rating Rationale. This discussion will also be included in the Complexity Analysis Summary page (Appendix C of Prescribed Fire Plan Template).

The Prescribed Fire Complexity Rating must be completed utilizing the Prescribed Fire Complexity Rating System Guide-

The purpose of the complexity rating process is to provide:

- Assignment of a complexity rating of high, moderate, or low to the prescribed fire.
- Management and implementation personnel a relative ranking as to the overall complexity of a specific prescribed fire project.
- A process that can be used to identify Prescribed Fire Plan elements or characteristics that may pose special problems or concerns.
- A process that identifies mitigation activities needed to reduce the risk/hazard to the implementation personnel and public as well as mitigating potential resource damage.

A preliminary rating will be completed early in the Prescribed Fire Plan development stage. This will identify potential concerns that may be mitigated during the plan preparation process. Once the Prescribed Fire Plan is near completion, the final complexity rating is made. The final complexity rating will be used as a basis for determining prescribed fire organization, Prescribed Fire Burn Boss level, and mitigation measures.

The Summary Complexity Rating Rationale will clearly justify the summary rating for prescribed fire organization and Prescribed Fire Burn Boss

level. It must also identify those risks from the Complexity Analysis that are rated high and cannot be mitigated and will provide a discussion of the risks associated. The Complexity Analysis must be signed by the Prescribed Fire Plan Preparer and the Agency Administrator and attached as an appendix to the Prescribed Fire Plan. The Complexity Analysis Summary will be attached to the Prescribed Fire Plan following the GO/NO-GO Checklists.

Separate prescriptions and/or burn organizations for different stages of implementation may result in multiple Complexity Analyses and ratings. For example, a plan may have separate prescriptions for spring and fall burning which may require different organizations and constitute the need for additional complexity analyses.

If a prescribed fire complexity changes which results in different Prescribed Fire Burn Boss qualifications, a separate complexity analysis is required. For example, for certain prescribed fires conducted over time, progressive or sequential actions may reduce complexity, organization and Prescribed Fire Burn Boss qualifications. (e.g. a large scale, high complexity prescribed fire has been black-lined, portions burned and operations suspended for a period of time then resumed to continue or finish the prescribed fire). In this case, a separate Complexity Analysis will be developed to reflect the reduced complexity rating and will be included in the appendix of the Prescribed Fire Plan.

Element 4. Description of the Prescribed Fire Area

A. Physical Description

This section of the plan will describe the physical features of the prescribed fire area.

- **Location:** Narrative description of the location of the prescribed fire project including a legal description, UTM and/or latitude/longitude (decimal degrees; NAD83 preferred), county, and state.

- **Size:** Area, in acres, of the prescribed fire project with a breakdown by prescribed fire unit and/or ownership if applicable.
- **Topography:** Identify the upper and lower range of elevation, slope(s) –maximum/minimum and average, and aspect(s) of the prescribed fire project.
- **Project Boundary:** **The project boundary defines that area where fire will be ignited and may be allowed to burn.** Describe the physical, natural and/or human made boundaries (including multiple units) of the prescribed fire project. This will be done through maps and may include narratives. The entire prescribed fire project area must be analyzed under NEPA.

B. Vegetation/Fuels Description

This is a description of current vegetation and fuels in the project area Identify any reference material used.

- Describe the structure and composition of the vegetation type(s) and fuel characteristics. This description may include natural or activity fuels, total fuel load (both live and dead) in tons/acre, dead fuel load by time-lag size classes, live fuel load (woody/herbaceous), fuel bed depth, and vertical and horizontal arrangement within the project boundary.
- Describe the percent of the unit composed of each vegetative type and the corresponding fuel model(s).
- Identify conditions (fuels, slope, and aspect) in and adjacent to boundaries that may be a potential threat for escaped fire.

C. Description of Unique Features and Resources:

List and discuss special features, hazards, regulations, issues, constraints, etc. Examples may include: fences to protect, power poles, historical/cultural sites, threatened and endangered species or habitat, etc.

D. Maps:

Maps will be developed and included in the Prescribed Fire Plan. At a minimum, the plan will include a vicinity and project map. The number of maps, map size and scale, legend and level of detail should be appropriate for the complexity of the project. All maps will include the standard mapping elements: title, name of preparer(s), date, north arrow, scale, and legend.

- **Vicinity Map:** Map scale will be such that the burn units can be located on the ground and in sufficient detail to guide implementation.
- **Project Map(s):** The project map(s) identify features in sufficient detail to guide and assist in operational implementation of the prescribed fire.

Element 5. Objectives

Describe in clear, concise statements the specific measurable resource and fire objectives for this prescribed fire. Objectives will be measurable and quantifiable so prescription elements can be developed to meet those objectives and the success of the project can be determined following implementation.

Element 6. Funding

Identify the funding source(s) and estimated cost(s) of the prescribed fire. Itemize by phase if desired.

Element 7. Prescription

Prescription is defined as the measurable criteria that define a range of conditions during which a prescribed fire may be ignited and held as a prescribed fire.

Parameters are quantitative variables expressed as a range that result in acceptable fire behavior and smoke management. The plan prescription will describe a range of low to high limits for the environmental (weather, topography, fuels, etc.) and fire behavior (flame lengths, rate of spread, spotting distance, etc.) parameters required to meet Prescribed Fire Plan objectives while meeting smoke management and control objectives.

In many cases, burning under the extremes of all prescriptive parameters would not meet or possibly exceed the desired prescribed fire behavior characteristics and are therefore out of prescription. Empirical evidence (historical evidence or researched data) and judgment may be utilized to identify or calibrate prescriptions. Weaknesses in modeling can be overridden, but must be justified with empirical evidence and/or verified actual fire behavior.

Separate prescriptions may be needed for multiple fuel model conditions to address seasonal differences and/or types of ignition (black lining, aerial ignition, etc). Separate prescriptions may result in multiple complexity ratings and burn organizations. For example, a separate prescription is needed for black-lining operations if conditions will be significantly different from the primary prescription or if the holding resources differ from those identified for ignition and holding phases. Separate prescriptions may result in the need to identify multiple levels of management, organizational structures, implementation measures, and pre-burn considerations.

If the prescription limits are exceeded, the Prescribed Fire Burn Boss must evaluate fire controllability and whether fire effects will meet objectives. The Prescribed Fire Burn Boss must take action to ensure objectives are being met, or take appropriate actions to maintain control of or secure the fire.

Holding and contingency plans must be developed with the consideration of the predicted fire behavior outside the project boundary(s). Fire behavior characteristics for fuel models within the maximum spotting distance and/or adjacent to the project boundaries must be considered and modeled. These predictions must be modeled using fire behavior model runs or empirical evidence of the hottest, driest, and windiest prescription limits identified in the

Prescribed Fire Plan, along with the most extreme environmental conditions (slope, aspect) identified.

A short fire behavior narrative that summarizes the fire behavior identified in the prescription and discusses how it will achieve the desired treatment objectives may be included.

When used, fire behavior calculations must be developed using an appropriate fire behavior modeling program. Include modeling and/or empirical evidence documentation as an appendix or in the fire behavior narrative.

Element 8. Scheduling

Identify the general ignition time frame(s) (i.e. time of day, duration of ignition) or season(s) and note any dates when the project may not be conducted. For prescribed fires with multiple ignitions or burn days, estimate project duration.

At National Preparedness Levels Four and Five, see National Interagency Mobilization Guide for details.

Element 9. Pre-burn Considerations & Weather

Describe on and off-site actions to be conducted and considerations to be addressed prior to implementation. Examples include clearances; mitigation actions generated by the initial complexity analysis; line to be built; preparation of critical holding points; snags to be felled or protected; equipment to be pre-positioned; special features to be protected; warning signs to be placed; weather recording; fuels condition sampling; monitoring needs; responsibility; and timeframes.

Describe any fuel sampling and weather data that may need to be obtained (See Element 14: Test Fire). This data should be taken at the project site. If this is not possible, use the closest representative site.

The plan will include a list of organizations (including media) and individuals that are to be notified prior to ignition, with information necessary to make the contacts. Reasonable efforts will be made to notify adjacent land owners (or their agents) and other potentially

impacted publics. Attempts and/or actual notifications will be documented with date and method and placed in the Project File.

Identify in the burn plan the method and frequency for obtaining weather and smoke management forecast(s). Spot weather or local area forecasts are required prior to ignition, on all ignition days and any days the fire is actively spreading. A copy of the forecast will be included in the Project File. The Prescribed Fire Burn Boss or other person in charge of mop-up and patrol will also obtain and review the spot weather or area forecast to determine if mop up and patrol resources are adequate.

Element 10. Briefing

All assigned personnel must be briefed at the beginning of each operational period to ensure personnel safety considerations (including the job hazard analysis or other agency-specific risk analysis) and prescribed fire objectives and operations are clearly defined and understood. Briefing checklists are required to be included in the Prescribed Fire Plan and will include the following elements:

- Burn Organization and Assignments
- Burn Objectives and Prescription
- Description of the Prescribed Fire Area
- Expected Weather & Fire Behavior
- Communications
- Ignition Plan
- Holding Plan
- Contingency Plan and Assignments
- Wildfire Conversion
- Safety and Medical Plan
- If aerial ignition devices will be used, include an Aerial Ignition briefing.

The briefing checklist should list briefing topics only, not re-state what is listed in the Prescribed Fire Plan for that element.

The Prescribed Fire Burn Boss will ensure that any new personnel arriving to the prescribed fire receives a briefing prior to assignment.

An Incident Action Plan (IAP) is optional, it is recommended for large multi-day or high complexity prescribed fires.

Element 11. Organization & Equipment

The complexity of each prescribed fire determines the organization capabilities needed to safely achieve the objectives specified in the Prescribed Fire Plan. Specify the minimum required implementation organization to meet the capabilities (line production rates, etc.) by position, equipment, and the supplies needed for all phases of the prescribed fire until declared out. At a minimum, a Prescribed Fire Burn Boss will be assigned to every prescribed fire. Positions that may not be filled as collateral duty will be identified in the organization chart of the Prescribed Fire Plan.

Standard ICS fire management principles for span of control and length of assignments will be adhered to when developing burn implementation organization(s) and used in managing prescribed fires. On prescribed fires with large organizations, use the ICS organization and staffing commensurate with the level of complexity. Consider the use of a Prescribed Fire Manager in conducting multiple prescribed fires.

Before implementation (all phases) of the prescribed fire, documentation in the form of an organization chart must be completed. Any changes to the organization during implementation must be documented. Any changes that reduce capability or increase complexity will require an amendment. Different organizations may be identified for different phases of implementation (i.e. holding v. mop-up and patrol, different ignition operations, different prescriptions).

Multiple prescriptions for one Prescribed Fire Plan are permissible (Element 7). Multiple prescriptions may require identifying and developing multiple organizations.

The Prescribed Fire Burn Boss is responsible for implementation including mop-up and patrol until the responsibility is formally passed to a Prescribed Fire Burn Boss, Prescribed Fire Manager or the local fire management organization.

Element 12. Communication

Develop communications plan specific to the project's implementation to address safety and tactical resource management needs. Identify and assign command, tactical, and air operations frequencies as needed. Also include any required telephone numbers.

Element 13. Public & Personnel Safety, Medical

Describe provisions to be made for public and personnel safety. All personnel who are within the active burn area are required to wear personal protective equipment. Identify and analyze the safety hazards unique to the individual prescribed fire project and specify personnel safety and emergency procedures. Include safety hazards (including smoke exposure and impacts) and measures taken to reduce those hazards. Specify emergency medical procedures, evacuation methods, and emergency facilities to be used. A job hazard analysis or other agency-specific risk analysis is required for each prescribed fire.

Element 14. Test Fire

Provisions for a test fire are required and results must be recorded. The test fire must be ignited in a representative location and in an area that can be easily controlled. The purpose of the test fire is to verify that the prescribed fire behavior characteristics will meet management objectives and to verify predicted smoke dispersion. In many applications, analysis of the initial ignitions may provide adequate test fire results. On multiple-day projects, evaluation of current active fire behavior, in lieu of a test fire, may provide a comparative basis for continuing and must be documented. If in doubt however, initiate a separate test fire and evaluate results.

Prior to ignition of both the test fire and ignition operations, compare the Prescribed Fire Plan prescription elements, both individually and collectively, against local area or spot weather forecasts, other predicted conditions, and the actual conditions onsite (See element 9: Pre-Burn Considerations) to ensure that predicted fire behavior will take place and/or weather

parameters will not change to the point of the burn going out of prescription.

Element 15. Ignition Plan

Describe planned ignition operations. Examples could include firing methods, devices, techniques, sequences, patterns, and ignition staffing for single or multiple unit operations. Maps showing proposed firing patterns may be included. If aerial ignition is planned, cover aviation operations, organization, and safety within the Prescribed Fire Plan, Aerial Ignition Plan, or in an agency specific Aviation Operating Plan (Refer to the Interagency Helicopter Operations Guide, {NFES #1885} and the Interagency Aerial Ignition Guide {NFES #1080} for more detailed information on this topic). Multiple prescriptions and ignition operations (blackline, primary, aerial, etc.) may require identifying and developing multiple ignition organizations.

Element 16. Holding Plan

Describe general procedures to be used for operations to maintain the fire within the project area and meet project objectives until the fire is declared out. This may include mop-up and/or patrol procedures. Describe critical holding points (if any) and mitigation actions. Critical holding points will be identified on the project map. Describe minimum capabilities needed for all phases of implementation (see Element 11: Organization and Equipment). If used, attach or reference modeling outputs or worksheets (i.e. Fireline Handbook production rates, BEHAVE, etc.) and/or documented empirical evidence to justify minimum holding resources required.

Different organizations may be identified for different phases of implementation (i.e. holding v. mop-up and patrol, different ignition operations, different prescriptions). Multiple prescriptions may require identifying multiple complexity ratings and developing multiple holding organizations.

If onsite resources are insufficient to meet the prescribed fire plan objectives, then the Burn Boss should implement the Contingency Plan or Wildfire Conversion.

Element 17. Contingency Plan

“...If the objectives are not being met the Contingency Plan, a required component of the Prescribed Fire Burn Plan, is implemented. If the Contingency Plan is successful at bringing the project back within the scope of the Prescribed Fire Burn Plan the project continues. If contingency objectives are not met the prescribed fire is converted to a wildfire and Extended Attack is undertaken.”

Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy, June 20, 2003, page 12.

The contingency plan is the portion of the Prescribed Fire Plan that considers possible but unlikely events and the actions needed to mitigate those events.

Contingency planning is the determination of initial actions and additional resources needed if the prescribed fire is not meeting, exceeds, or threatens to exceed:

- Project or unit boundary
- Objectives
- Prescription parameters
- Minimum implementation organization
- Smoke management objectives
- Other Prescribed Fire Plan elements

Contingency resources are those resources or capabilities required to meet contingency actions. These resources may be on or off site as required by the Prescribed Fire Plan. For purposes of this element, the terms *capabilities* and *resources* are interchangeable.

The contingency plan will establish trigger points or limits that indicate when additional actions and/or resources are needed. If additional resources will not be needed to implement the contingency plan, document the rationale in this section.

Contingency planning may include the additional resources required, and the maximum acceptable response time for those resources. Resource needs should be based on fire behavior outputs tied to the hottest, driest, windiest fire behavior

scenario as identified in Element 7: Prescription. Separate contingency plans may be necessary and appropriate to address seasonal differences, types of ignitions or phases of the burn implementation as described in the prescriptions and ignition and holding plans developed for the burn.

Verify and document availability of identified contingency resources and response time throughout each phase of the burn. If contingency resources availability falls below plan levels, actions must be taken to secure operations until identified resources are replaced.

The same contingency resource can be identified for multiple prescribed fire projects. When specific contingency resources are identified for more than one prescribed fire, the local fire management organization(s) must evaluate and document adequacy of all contingency resources within the area. This evaluation must consider:

- Local, current, and predicted fire danger
- Local and regional wildland fire activities.

Once a contingency resource is committed to a specific wildland fire action (wildfire, wildland fire use or prescribed fire), it can no longer be considered a contingency resource for another prescribed fire project and a suitable replacement contingency resource must be identified or the ignition secured.

The Agency Administrator will determine if and when they are to be notified that contingency actions are being taken.

If the contingency actions are successful at bringing the project back within the scope of the Prescribed Fire Plan, the project may continue. If contingency actions are not successful by the end of the next burning period, then the prescribed fire will be converted to a wildfire.

Element 18. Wildfire Conversion

The Prescribed Fire Plan will specify who has the authority to declare a wildfire. A prescribed fire must be declared a wildfire by those identified in the plan when that person(s) determines that the contingency actions have failed or are likely to fail and cannot be mitigated by the end of the next burning period. A prescribed fire must be declared a wildfire when

the fire has spread outside the project boundary, or is likely to do so, and cannot be contained by the end of the next burning period. A prescribed fire can be converted to a wildfire for reasons other than an escape.

Describe the actions to be taken when a prescribed fire is declared a wildfire.
Description will include:

- Wildfire declaration (by whom)
- IC assignment
- Notifications

A prescribed fire declared a wildfire cannot be returned to prescribed fire status.

Element 19. Smoke Management & Air Quality

Describe how the project will comply with local community, County, State, Tribal, and Federal air quality regulations. Identify what permits, if any, need to be obtained. Identify smoke sensitive receptors including population centers, recreation areas, hospitals, airports, transportation corridors, schools, non-attainment areas, Class I areas, and restricted areas that may be impacted. Include modeling outputs and mitigation strategies and techniques to reduce the impacts of smoke production, if required by State Implementation Plans (SIPs) and/or State or local regulations. Reference the Smoke Management Guide for Prescribed and Wildland Fire for other smoke management planning suggestions and smoke management techniques for reducing or redistributing emissions.

Special considerations must be taken to address smoke when the project is in a non-attainment area for a National Ambient Air Quality Standards including insuring compliance with SIP/TIP provisions and addressing Conformity. Projects which will potentially impact Class I areas should address any efforts to minimize smoke impacts on visibility. Comply with all local, State, Tribal and Federal pre-burn and post-burn data reporting requirements.

If a Notice of Violation (NOV) is issued by an air quality regulatory agency for a prescribed fire, a formal review of the incident must be conducted, following the guidance provided under the 'Reviews' chapter. If an air quality regulatory agency notifies a land management

agency that their prescribed fire may have contributed to an exceedance of a NAAQS then a review is highly recommended. Use of *Guidance for After Action Review of Smoke Impacts*, available at <http://www.nifc.gov/smoke> or other review approaches are recommended to the extent feasible in order meet information needs stipulated by the Final Rule on the Treatment of Data Influenced by Exceptional Events (40 CFR Parts 50 and 51).

Element 20. Monitoring

Prescribed fire monitoring is defined as the collection and analysis of repeated observations or measurements to evaluate changes in condition and progress toward meeting a management objective. Describe the monitoring that will be required to ensure that Prescribed Fire Plan objectives are met. For the prescribed fire, at a minimum specify the weather (forecast and observed), fire behavior and fuels information and smoke dispersal monitoring required during all phases of the project and the procedures for acquiring it, including who and when.

Element 21. Post-burn Activities

Describe the post-burn activities that must be completed. This may include post-burn report, safety mitigation measures, and rehabilitation needs including those as a result of pre-burn activities undertaken.

Appendices

Include all the required appendices.

- A. Maps
- B. Technical Review Checklist
- C. Complexity Analysis
- D. A job hazard analysis or other agency specific risk analysis (may be included here or in Project File)
- E. Fire Behavior Modeling Documentation or Empirical Documentation

Project File

All prescribed fire Project Files will contain the following information. Agencies and/or administrative units may require additional information.

1. Prescribed Fire Plan (and amendments)
2. Monitoring data including weather, fire behavior, fire effects and smoke dispersal observations
3. Weather forecasts
4. Notifications
5. Documented prescribed fire organization(s)
6. Any written agreements related to implementation
7. Multiple day GO/NO-GO checklist(s), if applicable
8. Re-validation of the agency administrator GO/NO-GO checklist (if applicable)

Depending on the scope and complexity of the prescribed fire, optional information and/or further documentation that may be included in the Project File include:

1. After Action Review (see Chapter 8)
2. Incident Action Plans, Unit Logs
3. Press releases, etc
4. Implementation costs
5. Actual ignition patterns and sequences used
6. Appropriate smoke management information
7. Agency individual fire occurrence form
8. Detailed Post Burn Report
9. NEPA documentation
10. Permits
11. Reference documents that helped in development of the plan.

Reviews

After Action Review (AAR)

Each operational shift on a prescribed fire should have an informal After Action Review (AAR). Certain events or a culmination of events that may affect future prescribed fire implementation and/or policy should be submitted via the Roll-up documentation (Found at <http://www.wildfirelessons.net>). The questions to answer in conducting an AAR are:

1. What did we set out to do (what was planned)?
2. What actually happened?
3. Why did it happen that way?
4. What should be sustained? What can be improved?

Declared Wildfire Reviews

The Agency Administrator will be notified of a declared wildfire. The Agency Administrator is required to make the proper notifications. All prescribed fires declared a wildfire will have a review initiated by the appropriate level Agency Administrator. The level and scope of the review will be determined by agency policy.

The goal of the declared wildfire review process is to guide future program actions by minimizing future resource damage and/or preventing future escapes from occurring by gathering knowledge and insight for incorporation into future resource management and prescribed fire planning. The objectives of the review are to:

- Determine if the Prescribed Fire Plan was adequate for the project and complied with policy and guidance related to prescribe fire planning and implementation.
- Determine if the prescription, actions, and procedures set forth in the Prescribed Fire Plan were followed.
- Describe and document factual information pertaining to the review.
- Determine if overall policy, guidance, and procedures relating to prescribed fire operations are adequate.
- Determine the level of awareness and the understanding of the personnel involved, in regard to procedures and guidance.

At a minimum, the declared wildfire review report will include the following elements:

1. An analysis of seasonal severity, weather events, and on-site conditions leading up to the wildfire declaration.
2. An analysis of the actions taken leading up to the wildfire declaration for consistency with the Prescribed Fire Plan.
3. An analysis of the Prescribed Fire Plan for consistency with policy.
4. An analysis of the prescribed fire prescription and associated environmental parameters.
5. A review of the approving line officer's qualifications, experience, and involvement.
6. A review of the qualifications and experience of key personnel involved.
7. A summary of causal agents contributing to the wildfire declaration.

Document the incident, including all actions prior to and after the declaration. Set up a file that includes all pertinent information, i.e., the Prescribed Fire Plan; a chronology of events including the prescribed fire report; unit logs and individual statements; weather forecasts including any spot forecasts; weather information taken on site and Remote Automated Weather Station (RAWS) and National Fire Danger Rating System (NFDRS) data for the day of the escape from the nearest station(s); photos; and all other pertinent information.

An independent review team is recommended for conducting declared wildfire reviews. The number of individuals assigned to the team and their functional expertise should be commensurate with the scope and focus of the review. Interagency participation is highly recommended for all declared wildfire reviews.

Air Quality Notice of Violation (NOV) Reviews

This review would follow direction in "Declared Wildfire Reviews" that support understanding of the planning, the decisions made, and actions taken that contributed to the NOV. In addition, the elements below which are unique to smoke incidents affecting air quality must be addressed.

The review may also utilize the *Guidance for After-Action-Review of Smoke Impacts* found at the <http://www.nifc.gov/smoke> website. At a minimum the NOV review will include:

- An analysis of the smoke sensitive receptors identified in the prescribed fire plan, estimated smoke effects including modeling and any smoke monitoring observations and effects related to the burn project.
- An analysis of predicted vs. actual ambient air quality using best on-site fuels information available (e.g. fuel conditions, fire behavior, fuel consumption), emissions production (quantity and duration) and weather.
- If needed to determine causes of impacts, a comparison between pre-burn smoke dispersion modeling and post-burn modeling using best on-site information available.
- Assess the smoke management training of personnel, policies for smoke management, and performance of the smoke management elements of the Prescribed Fire Plan for the prescribed fire under review.
- Assess the smoke management practices used for the prescribed fire and the role of cumulative smoke impacts from other burning activities for how they affected the issuance of the NOV.

References

NWCG Glossary of Wildland Fire Terminology PMS 205

Additional definitions found in the NWCG glossary of Project Management Terms
(<http://www.nwcg.gov/teams/pmo/products/glossaries.htm>)

National Fire & Aviation Executive Board, Federal Fire Policy Directives Task Group – Common Policy Language, November 19, 2004

Interagency Strategy for the Implementation of Federal Wildland Fire Management policy, September 7, 2004

Smoke Management Guide for Prescribed and Wildland Fire 2001 Edition, December 2001

Restoring Fire Adapted Ecosystems on federal Lands - A Cohesive Fuel Treatment Strategy for Protecting People and Sustaining Natural resources. August 2, 2002

10-Year Comprehensive Strategy Implementation Plan, May 2002

Prescribed Fire Complexity Rating System Guide PMS 424, January 2002

Review and Update of the 1995 Federal Wildland Fire Management Policy, January 2001.

Cerro Grande Prescribed Fire Investigative Report - National Park Service, May 18, 2000

Sawtooth Mountain Prescribed Fire Burnover Fatality - Bureau of Indian Affairs Fort Apache Agency, Arizona May 14, 2003

Lowden Ranch Prescribed Fire Review Final Report - Bureau of Land Management, July 22, 1999

Wildland and Prescribed Fire Qualifications System Guide PMS 310-1
January 2002

Appendix A: Laws and Authorities

Organic Administration Act of June 4, 1897 (16 U. S. C. 551)

Weeks Law, Act of March 1, 1911 (16 U. S. C. 563)

National Park Service Act of 1916 as amended (67 Stat. 495; 16 U.S.C. 1 et seq.)

Protection Act of September 20, 1922 (42 Stat. 857; 16 U.S.C. 594)

Clark-McNary Act of 1928 (45 Stat. 221; 16 U. S. C. 487)

McSweeney-McNary Act of 1928 (45 Stat. 221; 16 U.S.C. 487)

Economy Act of June 30, 1932 (47 Stat. 417; 31 U.S.C. 1535)

Taylor Grazing Act of June 28, 1934 (48 Stat. 1269; 43 U.S.C. 315)

Oregon and California Act of August 28, 1937 (50 Stat. 875; 43 U.S.C. 1181e)

Bankhead-Jones Farm Tenant Act of July 22, 1937 (7 U. S. C. 1010 - 1011)

Federal Property and Administrative Service Act of 1949 (40 U.S.C. 471; et seq.)

Reciprocal Fire Protection Act of May 27, 1955 (69 Stat. 66; 42 U.S.C. 1856a)

Clean Air Act of July 14, 1955, as amended (42 U. S. C. 7401 et seq.)

Multiple-Use Sustained Yield Act of 1960 (16 U. S. C. 528)

Wilderness Act of 1964 (16 U. S. C. 1131 - 1132)

National Wildlife Refuge System Administration Act of 1966 as amended (80 Stat. 927; 16 U.S.C. 668dd through 668ee)

National Environmental Policy Act of 1969 (42 U. S. C. 4321)

Alaska Native Claims Settlement Act of 1971 (85 Stat. 688; 43 U.S.C. 1601)

Endangered Species Act of 1973 (16 U. S. C. 1531 - 1544)

Disaster Relief Act of May 22, 1974 (88 Stat. 143; 42 U.S.C. 5121)

Federal Fire Prevention and Control Act of 1974 (88 Stat. 1535; 15 U.S.C. 2201)

National Forest Management Act of 1976 (16 U. S. C. 1600 et seq.)

Federal Land Policy and Management Act of 1976 (90 Stat. 2743)

Federal Grant and Cooperative Agreement Act of 1977 (P.L. 950224, as amended by P.L. 97-258, September 13, 1982 (96 Stat. 1003; 31 U.S.C. 6301 thru 6308)

Alaska National Interest Lands Conservation Act of 1980 (94 Stat. 2371)

Supplemental Appropriation Act of September 10, 1982 (96 Stat. 837)

Wildfire Suppression Assistance Act of 1989 (P.L. 100-428, as amended by P.L. 101-11, April 7, 1989), 42 U. S. C. 1856

Indian Self-Determination and Education Assistance Act (PL 93-638) as amended

National Indian Forest Resources Management Act (P. L. 101-630 November 28, 1990)

Tribal Self-Governance Act of 1994 (P.L. 103-413)

Department of the Interior and Related Agencies Appropriations Act, Fiscal Year 1995 (P.L. 103-332)

National Wildlife Refuge System Improvement Act of 1997 (P.L. 105-57)

Federal Financial Assistance Management Act of 1999 (P.L. 106-107)

Healthy Forest Restoration Act of 2003 (P.L. 108-18, 117 Stat. 1887)

Tribal Forest Protection Act of 2004 (P.L. 108-287)

Department of the Interior, Departmental Manual; Part 620: Wildland Fire Management;
Chapter 4: Fuels Management and Wildland-Urban Interface Community Assistance

Department of Agriculture, US Forest Service Manual; FSM 5100: Fire Management; Chapter 5140:
Fire Use

National Historic Preservation Act (1966 as amended)

Appendix B: Prescribed Fire Plan Template

A standardized, reproducible template form for the Prescribed Fire Plan development process is included in this appendix. A standardized format is provided for the Prescribed Fire Plan in PDF. An electronic version editable in Word is also available. Users should prepare the plan using the electronic version.

PRESCRIBED FIRE PLAN

ADMINISTRATIVE UNIT(S): _____

PRESCRIBED FIRE NAME: _____

PREPARED BY: _____ **DATE:** _____

Name & Qualification/Currency

TECHNICAL REVIEW BY: _____ **DATE:** _____

Name & Qualification/Currency

COMPLEXITY RATING: _____

MINIMUM RXB REQUIREMENT: _____

APPROVED BY: _____ **DATE:** _____

Agency Administrator

ELEMENT 2: AGENCY ADMINISTRATOR GO/NO-GO PRE-IGNITION APPROVAL CHECKLIST

Instructions: The Agency Administrator's GO/NO-GO Pre-Ignition Approval is the intermediate planning review process (i.e. between the Prescribed Fire Complexity Rating System Guide and Go/No-Go Checklist) that should be completed before a prescribed fire can be implemented. The Agency Administrator's Go/No-Go Pre-Ignition Approval evaluates whether compliance requirements, Prescribed Fire Plan elements, and internal and external notifications have been or will be completed and expresses the Agency Administrator's intent to implement the Prescribed Fire Plan. If ignition of the prescribed fire is not initiated prior to expiration date determined by the Agency Administrator, a new approval will be required.

YES	NO	KEY ELEMENT QUESTIONS
		Is the Prescribed Fire Plan up to date? <i>Hints: amendments, seasonality.</i>
		Will all compliance requirements be completed? <i>Hints: cultural, threatened and endangered species, smoke management, NEPA.</i>
		Is risk management in place and the residual risk acceptable? <i>Hints: Prescribed Fire Complexity Rating Guide completed with rational and mitigation measures identified and documented?</i>
		Will all elements of the Prescribed Fire Plan be met? <i>Hints: Preparation work, mitigation, weather, organization, prescription, contingency resources</i>
		Will all internal and external notifications and media releases be completed? <i>Hints: Preparedness level restrictions</i>
		Will key agency staff be fully briefed and understand prescribed fire implementation?
		Are there any other extenuating circumstances that would preclude the successful implementation of the plan?
		Have you determined if and when you are to be notified that contingency actions are being taken? Will this be communicated to the Burn Boss?
		Other:

Recommended by: _____ Date: _____
FMO/Prescribed Fire Burn Boss

Approved by: _____ Date: _____
Agency Administrator

Approval expires (date): _____

ELEMENT 2: PRESCRIBED FIRE GO/NO-GO CHECKLIST

A. Has the burn unit experienced unusual drought conditions or does it contain above normal fuel loadings which were not considered in the prescription development? If <u>NO</u> proceed with checklist below, if <u>YES</u> go to item B.	YES	NO
B. Has the prescribed fire plan been reviewed and an amendment and technical review been completed; or has it been determined that no amendment is necessary? If <u>YES</u> to <u>any</u> , proceed with checklist below, if <u>NO</u> , STOP.		

YES	NO	QUESTIONS
		Are ALL pre-burn prescription parameters met?
		Are ALL smoke management specifications met?
		Has ALL required current and projected fire weather forecast been obtained and are they favorable?
		Are ALL planned operations personnel and equipment on-site, available, and operational?
		Has the availability of ALL contingency resources been checked and are they available?
		Have ALL personnel been briefed on the project objectives, their assignment, safety hazards, escape routes, and safety zones?
		Have all the pre-burn considerations identified in the Prescribed Fire Plan been completed or addressed?
		Have ALL the required notifications been made?
		Are ALL permits and clearances obtained?
		In your opinion, can the burn be carried out according to the Prescribed Fire Plan and will it meet the planned objective?

If all the questions were answered "YES" proceed with a test fire. Document the current conditions, location, and results

Burn Boss

Date

ELEMENT 3 COMPLEXITY ANALYSIS SUMMARY

PRESCRIBED FIRE NAME			
ELEMENT	RISK	POTENTIAL CONSEQUENCE	TECHNICAL DIFFICULTY
1. Potential for escape			
2. The number and dependence of activities			
3. Off-site Values			
4 On-Site Values			
5. Fire Behavior			
6. Management organization			
7. Public and political interest			
8. Fire Treatment objectives			
9 Constraints			
10 Safety			
11. Ignition procedures/ methods			
12. Interagency coordination			
13. Project logistics			
14 Smoke management			

COMPLEXITY RATING SUMMARY	
	OVERALL RATING
RISK	
CONSEQUENCES	
TECHNICAL DIFFICULTY	
SUMMARY COMPLEXITY DETERMINATION	
RATIONALE:	

ELEMENT 4: DESCRIPTION OF PRESCRIBED FIRE AREA

A. Physical Description

1. Location:
2. Size:
3. Topography:
4. Project Boundary:

B. Vegetation/Fuels Description:

1. On-site fuels data
2. Adjacent fuels data

C. Description of Unique Features:

ELEMENT 5: OBJECTIVES

A. Objectives:

1. Resource objectives:
2. Prescribed fire objectives:

ELEMENT 6: FUNDING:

A. Cost:

B. Funding source:

ELEMENT 7: PRESCRIPTION

A. Environmental Prescription:

B. Fire Behavior Prescription:

ELEMENT 8: SCHEDULING

A. Ignition Time Frames/Season(s):

B. Projected Duration:

C. Constraints:

ELEMENT 9: PRE-BURN CONSIDERATIONS AND WEATHER

A. Considerations:

1. On Site:
2. Off Site

B. Method and Frequency for Obtaining Weather and Smoke Management Forecast(s):

C. Notifications:

ELEMENT 10: BRIEFING

Briefing Checklist:

- ☐ Burn Organization
- ☐ Prescribed Fire Objectives
- ☐ Description of Prescribed Fire Area
- ☐ Expected Weather & Fire Behavior
- ☐ Communications
- ☐ Ignition plan
- ☐ Holding Plan
- ☐ Contingency Plan

- ☐ Wildfire Conversion
- ☐ Safety and Medical Plan
- ☐ Aerial Ignition Briefing (if Required)

ELEMENT 11: ORGANIZATION AND EQUIPMENT

A. Positions:

B. Equipment:

C. Supplies:

ELEMENT 12: COMMUNICATION

A. Radio Frequencies

1. Command Frequency(s):
2. Tactical Frequency(s):
3. Air Operations Frequency(s):

B. Telephone Numbers:

ELEMENT 13: PUBLIC AND PERSONNEL SAFETY, MEDICAL

A. Safety Hazards:

B. Measures Taken to Reduce the Hazards:

C. Emergency Medical Procedures:

D. Emergency Evacuation Methods:

E. Emergency facilities:

ELEMENT 14 TEST FIRE

A. Planned location:

B. Test Fire Documentation:

1. Weather conditions On-Site:
2. Test Fire Results:

ELEMENT 15: IGNITION PLAN

A. Firing Methods (including Techniques, Sequences and Patterns):

B. Devices:

C. Ignition Staffing:

ELEMENT 16: HOLDING PLAN

A. General Procedures for Holding:

B. Critical Holding Points and Actions:

C. Minimum Organization or Capabilities Needed:

ELEMENT 17: CONTINGENCY PLAN

A. Trigger Points:

B. Actions Needed:

C. Additional Resources and Maximum Response Time(s):

ELEMENT 18: WILDFIRE CONVERSION

- A. Wildfire Declared By:**
- B. IC Assignment:**
- C. Notifications:**
- D. Extended Attack Actions and Opportunities to Aid in Fire Suppression:**

ELEMENT 19: SMOKE MANAGEMENT AND AIR QUALITY

- A. Compliance:**
- B. Permits to be Obtained:**
- C. Smoke Sensitive Receptors:**
- D. Potential Impacted Areas:**
- E. Mitigation Strategies and Techniques to Reduce Smoke Impacts:**

ELEMENT 20: MONITORING

- A. Fuels Information Required and Procedures:**
- B. Weather Monitoring (Forecasted and Observed) Required and Procedures:**
- C. Fire Behavior Monitoring Required and Procedures:**
- D. Monitoring Required To Ensure That Prescribed Fire Plan Objectives Are Met:**
- E. Smoke Dispersal Monitoring Required and Procedures:**

ELEMENT 21: POST-BURN ACTIVITIES

Post-Burn Activities That Must Be Completed:

APPENDICES

- A. Maps: Vicinity and Project**
- B. Technical Review Checklist**
- C. Complexity Analysis**
- D. Agency Specific Job Hazard Analysis**
- E. Fire Behavior Modeling Documentation or Empirical Documentation (unless it is included in the fire behavior narrative in Element 7; Prescription)**

A: MAPS

1. Vicinity Map:

2. Project Map:

B: TECHNICAL REVIEWER CHECKLIST

PREScribed FIRE PLAN ELEMENTS:	S /U	COMMENTS
1. Signature page		
2. GO/NO-GO Checklists		
3. Complexity Analysis Summary		
4. Description of the Prescribed Fire Area		
5. Objectives		
6. Funding		
7. Prescription		
8. Scheduling		
9. Pre-burn Considerations and Weather		
10. Briefing		
11. Organization and Equipment		
12. Communication		
13. Public and Personnel Safety, Medical		
14. Test Fire		
15. Ignition Plan		
16. Holding Plan		
17. Contingency Plan		
18. Wildfire Conversion		
19. Smoke Management and Air Quality		
20. Monitoring		
21. Post-burn Activities		
Appendix A: Maps		
Appendix C: Complexity Analysis		
Appendix D: Agency specific job hazard analysis		
Appendix E: Fire Prediction Modeling Runs or Empirical Evidence		
Other		

S = Satisfactory

U = Unsatisfactory

Recommended for Approval: _____ Not Recommended for Approval: _____

Technical Reviewer

Qualification and currency (Y/N)

Date

☐ Approval is recommended subject to the completion of all requirements listed in the comments section, or on the Prescribed Fire Plan.

C: COMPLEXITY ANALYSIS

D: AGENCY SPECIFIC JOB HAZARD ANALYSIS

E: FIRE BEHAVIOR MODELING DOCUMENTATION OR EMPIRICAL DOCUMENTATION