

significantly contribute to: (1) violations of a PM_{2.5} or PM₁₀ NAAQS, (2) visibility impairment in mandatory Class I Federal areas, or (3) failure to achieve reasonable progress toward the national visibility goal. Rather, EPA will call for adoption of the basic SMP, described in section VI, as part of the SIP/TIP for PM and visibility. The EPA will also notify the governor of the State or the tribal government that the area should be redesignated as nonattainment. The SMP adopted in response to the SIP/TIP call must require mandatory participation for greater than de minimis fires, must be adopted into the SIP/TIP, and must be Federally enforceable. The SIP/TIP will also have to meet all other CAA requirements applicable to nonattainment areas.

3. Interstate Transport of Smoke

Several key provisions of the CAA address interstate pollutant transport. Section 110(a)(2)(D) provides that a SIP must contain provisions preventing subject sources from contributing significantly to nonattainment problems or interfering with maintenance in any other State. That section also prohibits interference with any SIP required measures under part C to prevent significant deterioration or to protect visibility. Section 169A authorizes EPA to promulgate regulations requiring states that “may reasonably be anticipated to cause or contribute to” visibility impairment in mandatory Class I Federal areas to include in their SIP’s measures necessary to eliminate or reduce such impairment. Section 126 provides that, in response to petitions from government entities regarding significant pollutant transport, EPA may prescribe certain corrective measures. Also, sections 169B, 176A and 184 contain provisions for cooperatively addressing interstate pollution problems by establishing interstate transport regions and commissions to address region wide pollution and visibility concerns. The EPA promulgated a final rule, pursuant to the requirements of section 301(d) of the CAA that authorizes eligible Indian tribes to also implement these provisions.⁵ If fires managed for resource benefits in one State (or on Indian lands) cause or significantly contribute to NAAQS violations in another State (or on Indian lands), EPA is authorized to take action under section 110(k)(5) of the CAA to address the problem. If, among other things, EPA finds that a SIP/TIP is substantially inadequate to attain or maintain the NAAQS, it may require the SIP/TIP to be revised to correct the

⁵See Volume 63 Federal Register 7254, February 12, 1998.

inadequacy (e.g., transported smoke).

C. Role of Wildland Owners/Managers

Wildland owners/managers are responsible for following State/tribal regulations applicable to fires, obtaining authorization to burn, and following the approved burn plan, when one is required. Owners/managers are responsible for taking appropriate actions to control the fire and reduce exposure to smoke when adverse air quality impacts result from a failure of the air quality prescription or an escaped fire.

There is a special need for fires managed by Federal agencies to have burn plans that include smoke management components. Fires managed by Federal agencies are most likely to impact air quality in recreation areas (national parks, forest, etc.) and impair visibility in mandatory Class I Federal areas. The EPA encourages Federal agencies to include smoke management components in all burn plans, regardless of the existence of a State/tribal SMP.

VIII. DATA ON WILDLAND and PRESCRIBED FIRES

Most of a State/tribal program to protect air quality is contained in a SIP or TIP. Since the use of fire for resource management is expected to increase substantially, especially on Federal lands, State/tribal air quality managers will need information to develop potential annual or seasonal air pollutant emission estimates for SIP/TIP planning. As for any source, emissions from fires can be estimated by multiplying the estimated level of activity by an emission factor. The level of activity for fire is the mass of biomass (fuel) consumed, usually expressed in tons. Emission factors expressed in pounds per ton of fuel consumed are available in EPA's publication AP-42 (which is scheduled to be updated). Emission factors are derived from an estimate of overall combustion efficiency (i.e. stoichiometric ratio). The mass of fuel consumed is the product of fire size (acres), pre-burn fuel loading (tons per acre), and fuel consumption (percent of pre-burn loading). An emission inventory can be compiled by the affected air agency for an individual fire, a statistical class of fires, a burn program, or a population of fires in a given area over a period of time based on this information.

Federal land management agencies currently collect data on wildland and prescribed fires, however, no standard reporting format is followed. These raw data are usually limited to the time and approximate location of the fire, fire perimeter area, weather (occasionally) and a

qualitative description of fuels at the point of ignition. The data are not collected for the purpose of calculating air pollutant emissions and are probably inadequate for that purpose.

A National Interagency Fire Statistics Information Project has been initiated to develop an easily accessible system for storing a set of commonly agreed upon fire data. Post-burn data, such as that described above, on future wildland and prescribed fires would be stored in this database. The database will be accessible by air quality managers to estimate past, current, and future emission trends from this source category.

The EPA encourages the Federal land management agencies to develop the fire statistics database and FLM's to report fire data to the system. These fire data will be needed by air quality managers in regions where most wildland and prescribed fires occur on Federal lands. Air quality managers should request similar fire data for wildland and prescribed fires on State, private and Indian wildlands as well as information on other types of open burning to complete their emission inventories.

Statewide emissions from fire use in all 50 states during 1989 have been estimated based on a survey of [Federal, State and private] land owners/managers. [Ref. Peterson/Ward] Also, a spatially resolved inventory of prescribed burning by county for 1990 and by 50km grid for 1995, 2015 and 2040 was prepared for 10 western States as part of the Grand Canyon Visibility Transport Commission's activities. [Ref. Peterson/Lahm] The emission estimates are based on fuel models derived from 14 types of vegetative cover spatially mapped throughout the area and estimates of fuel loadings as either low, medium or high. The procedures followed by Peterson and Lahm to estimate emissions for the western states provide a good model for developing emissions estimates for other areas, also.

Further information on developing emissions estimates and the data required can be found in the white paper "Emission Inventories for SIP Development." See Section I to obtain a copy.

IX. MEETING OTHER CLEAN AIR ACT REQUIREMENTS

A. Demonstrate Conformity of Federal Activities

Activities on Federal lands must meet the requirements of the CAA, including the provisions of section 176(c), that such activities "conform" to the purpose of the applicable SIP. The EPA's Conformity rules, implementing the provisions of section 176(c), only apply to

Federal actions taken within a nonattainment or maintenance area. The Transportation Conformity rules govern transit-related activities, and all other type of activities are governed by the General Conformity rules. The rules require a Federal agency to demonstrate, prior to initiating a project, that its action conforms to all applicable requirements in a SIP and will not cause or contribute to NAAQS violations. The General Conformity rules provide Federal agencies with several options for demonstrating conformity. The following options are most typically followed : (1) a modeling demonstration to show that emissions from the project will not increase the frequency or severity of a NAAQS violation, (2) obtaining emission reductions that offset the new project emissions, or (3) showing that the project's emissions are already included in, or accommodated by, the emissions inventory of the SIP for the relevant nonattainment or maintenance area. Federal activities occurring on tribal lands will be addressed by EPA consistent with its Tribal Air Rule and the requirements of the CAA.

The above procedures can be followed to demonstrate conformity of fire projects for a Federal land management agency's administrative units based on the FMP's developed for such units. The demonstration can be made on an annual basis for all burns within the airshed of a nonattainment or maintenance area. Alternatively, the demonstration can be made for each individual fire project conducted at the administrative unit.

In addition to the previously cited methods for demonstrating conformity of Federal fire projects, EPA will pursue, in consultation with the other Federal agencies, adding an alternative method to the General Conformity rules through rulemaking. At a minimum, EPA believes that the alternate method should require a Federal agency to document that its fire projects are managed within a certified SMP. The SMP also must require regional coordination (cooperation of all jurisdictions in an airshed) of burn plan authorization and real-time air quality monitoring at sensitive receptors, when warranted, in addition to the basic program components discussed in section VI.

B. Visibility/Regional Haze Requirements

The EPA's visibility regulations (45 FR 80084, December 2, 1980) protect mandatory Class I Federal areas from manmade impairment that is "reasonably attributable" to a single emission source or small group of sources. FLM's for mandatory Class I Federal areas have a key

consultative role and responsibility to participate in the development of SIP's for visibility impairment that is reasonably attributable to specific sources. In Part C of the CAA which includes the visibility protection mandate, Congress assigned FLM's the "affirmative responsibility to protect air quality related values (including visibility)" in mandatory Class I Federal areas. Under EPA's regulations, States must take appropriate actions to address all sources of visibility impairment, including fires, in response to a FLM's certification of reasonably attributable impairment in mandatory Class I Federal areas.

A new regulatory program to protect mandatory Class I Federal areas from "regional haze" impairment was proposed by EPA on July 31, 1997 (62 FR 41137). After the regional haze rules become final, States will need to address the impacts of fires and other contributing sources on meeting reasonable progress in their control strategy analyses, as well as during periodic progress assessments. The EPA will revisit this section of the Air Quality Policy on Wildland and Prescribed Fires after the final rules for implementing the regional haze program have been promulgated. The EPA will also develop guidance on assessing natural background visibility to aid in implementing the regional haze rules, and will consider the following paper at that time. The white paper "Estimating Natural Emissions From Wildland and Prescribed Fire" presents preliminary options for defining natural wildland and prescribed fire emissions that may or may not be consistent with the final regional haze rules. See Section I to obtain a copy.

C. Prevention of Significant Deterioration

Title I, part C of the CAA requires SIP's to include provisions to prevent the significant deterioration of air quality in areas designated as attainment or unclassifiable for any NAAQS. "Significant deterioration" for any pollutant is defined as an unacceptable incremental increase in ambient concentrations above the baseline concentration for that pollutant in an area. The PSD "increments" have been established for SO₂, NO₂, and PM₁₀. The EPA adopted NAAQS for PM_{2.5}, which became effective on September 16, 1997. However, no increments have yet been promulgated for PM_{2.5}.

The SIP's are required to contain emission limits and such other measures as may be necessary to prevent significant deterioration of air quality. See section 161 of the Act. In addition, SIP's are required to include a preconstruction review permit program for new and

modified major stationary sources. See section 165 of the Act. The SIP's must ensure that increases in emissions from all types air pollution sources do not cause the allowable increment for a pollutant to be exceeded.

While fires managed for resource benefits generally are not subject to a preconstruction review and the issuance of a PSD permit, the emissions from such activities may affect the air quality in a PSD area. Under adverse conditions, the combined PM emissions from increased fire activities and from other sources could possibly result in ambient concentrations that exceed the allowable PSD increments for PM. Historically, EPA has often regarded fires managed for resource benefits to be temporary activities.⁶ The PM emissions resulting from fire activities differ from the PM emissions generated by most other sources because they are generally short-lived. That is, the burning generally is carried out infrequently at a specific location (once every 5-20 years) and the duration tends to be short (approximately 1-2 days). Even with the proposed increased utilization of fire as a resource management tool, the resulting PM emissions are expected to be relatively uncommon at a particular location and of short duration.

Section 163(c)(1)(C) of the Act authorizes States with approved PSD programs to exclude (with the Administrator's approval) concentrations of PM caused by "construction or other temporary emission-related activities" when determining compliance with the PSD increments. The EPA generally supports the concept of allowing States with approved SIP's to exclude emissions caused by temporary managed fire activities from increment analyses, provided the exclusion does not result in permanent or long-term air quality deterioration. Nevertheless, the decision as to whether PM emissions from fire activities should be counted against the PSD increments for PM is a decision to be made by individual States. The EPA expects States to consider the extent to which a particular type of prescribed burning activity is truly temporary, as opposed to those activities which can be expected to occur in a particular area with some regularity over a period of time.

⁶See Volume 58 Federal Register 31633, June 3, 1993.

DEFINITIONS

Air Quality: The characteristics of the ambient air (all locations accessible to the general public) as indicated by concentrations of the six air pollutants for which national standards have been established [i.e., particulate matter (PM), sulfur dioxide (SO₂), nitrogen dioxide (NO₂), ozone (O₃), carbon monoxide (CO) and lead], and by visibility in mandatory Federal Class I areas. For the purposes of this policy, concentrations of PM are taken as the primary indicators of ambient air quality.

Air Quality Manager: The regulatory body responsible for managing the air quality protection program for a State, local or tribal government.

Air Quality Related Values (AQRV): Those special attributes of a mandatory Class I Federal area that deterioration of air quality may adversely affect. Some examples of AQRV include: flora and fauna, water, visibility, and odor among others.

Ambient Air: That portion of the atmosphere, external to buildings, to which the general public has access.

Administrative Unit: A unit of land (Forest, Refuge, Park, etc.) under the administration of a public land management agency.

AP-42: The Environmental Protection Agency's (EPA) Compilation of Air Pollutant Emission Factors for stationary point, area, and mobile sources. An emission factor is a representative value that attempts to relate the quantity of a pollutant released to the atmosphere with an activity associated with the release of that pollutant. Emission factors are then used to estimate the magnitude of a source's pollutant emissions.

The plan includes the project objective, fire prescription (including smoke management components), personnel, organization, equipment, etc.

Class I Area: An area set aside under the Clean Air Act (CAA) to receive the most stringent protection from air quality degradation. Mandatory Class I Federal areas are (1) international parks, (2) national wilderness areas which exceed 5,000 acres in size, (3) national memorial parks which exceed 5,000 acres in size, and (4) national parks which exceed 6,000 acres and were in existence prior to the 1977 CAA Amendments. The extent of a mandatory Class I Federal area includes subsequent changes in boundaries, such as park expansions.

De Minimis Fires: Fires that will cover fewer than X acres or consume less than Y tons of fuel, as established by a State or tribe.

Federal Implementation Plan (FIP): A plan (or portion thereof) promulgated by the Administrator, as provided for under the CAA and any applicable EPA regulations, including regulations governing tribal air plans, to fill all or a portion of a gap or otherwise correct all or a portion of an inadequacy in a State or tribal implementation plan (TIP), and which may include enforceable emission limitations or other control measures, means or techniques (including economic incentives, such as marketable permits or auctions of emissions allowances), and provides for attainment of the relevant national ambient air quality standard (NAAQS).

Federal Land Manager (FLM): With respect to any lands in the United States, the Secretary of the Federal department with authority over such lands. Generally, the Secretaries delegate their authority to specific elements within each department. For example, the National Park Service and the Fish and Wildlife Service manage those areas under the authority of the Department of the Interior.

Fire Dependent Ecosystem: A community of plants and animals that must experience recurring disturbances by fire, in order to sustain its natural plant succession, structure and composition of vegetation, and maintain appropriate fuel loading and nutrient cycling to ensure proper ecosystem function.

Fire Management Plan (FMP): A strategic plan that defines a program to manage wildland and prescribed fires, and documents the FMP to meet management objectives outlined in the approved land use plan. The plan is supplemented by operational procedures such as preparedness plans, burn plans and prevention plans.

Fuel: Includes combustible vegetative matter such as grass, trees, shrubs, limbs, branches, duff, and stumps.

Indian Land: Indian land in this document refers to Indian country which is (a) all land within the limits of any Indian reservation under the jurisdiction of the United States Government, notwithstanding the issuance of any patent, and, including rights-of-way running through the reservation, (b) all dependent Indian communities within the borders of the United States whether within the original or subsequently acquired territory thereof, and whether within or without the

limits of a state, and (c) all Indian allotments, the Indian titles to which have not been extinguished, including rights-of-way running through the same. [See 18 U.S.C. 1151.]

Land Use Plan: A broad scale, long range plan (e.g., forest plan, refuge plan or resource management plan) that identifies the scope of actions and goals for the land and resources administered by a land owner/manager.

National Ambient Air Quality Standards (NAAQS): Standards for maximum acceptable concentrations of pollutants in the ambient air to protect public health with an adequate margin of safety, and to protect public welfare from any known or anticipated adverse effects of such pollutants (e.g., visibility impairment, soiling, materials damage, etc.) in the ambient air.

National Environmental Policy Act (NEPA): Establishes procedures that Federal agencies must follow in making decisions on Federal actions which may impact the environment. Procedures include evaluation of environmental effects of proposed actions, and alternatives to proposed actions; involvement of the public and cooperating agencies.

Nuisance Smoke: Amounts of smoke in the ambient air which interfere with a right or privilege common to members of the public, including the use or enjoyment of public or private resources.

Particulate Matter (PM): Any airborne finely divided material, except uncombined water, which exists as a solid or liquid at standard conditions (e.g., dust, smoke, mist, fumes, or smog).

PM_{2.5}: Particles with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers.

PM₁₀: Particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers (including PM_{2.5}).

Prescribed Fire: Any fire ignited by management actions to meet specific objectives (i.e., managed to achieve resource benefits).

Prescription: Measurable criteria which guide selection of appropriate management response and actions. Prescription criteria may include the meteorological conditions affecting the area under prescription, as well as factors related to the state of the area to be burned such as

the fuel moisture condition and other physical parameters. Other criteria which may be considered include safety, economic, public health, environmental, geographic, administrative, social or legal considerations, and ecological and land use objectives.

Prevention of Significant Deterioration (PSD): A requirement in the CAA, which establishes the maximum allowable increases in ambient air concentrations of selected air pollutants above baseline concentrations in areas designated as Class I, Class II, or Class III.

Project Plan: A strategic plan for accomplishing specific actions and goals (objectives) established in a land use plan. A project may include several activities such as cutting and hauling trees and shrubs, planting trees, building trails, and fire treatment.

Regional Haze: Generally, concentrations of fine particles in the atmosphere extending up to hundreds of miles across a region and promoting noticeably hazy conditions; wide-spread visibility impairment, especially in mandatory Class I Federal areas where visibility is an important value.

Sensitive Receptors: Population centers such as towns and villages, camp grounds and trails, hospitals, nursing homes, schools, roads, airports, mandatory Class I Federal areas, etc. where smoke and air pollutants can adversely affect public health, safety and welfare.

Smoke Management Program (SMP): Establishes a basic framework of procedures and requirements for managing smoke from fires that are managed for resource benefits. The purposes of SMP's are to mitigate the nuisance and public safety hazards (e.g., on roadways and at airports) posed by smoke intrusions into populated areas; to prevent deterioration of air quality and NAAQS violations; and to address visibility impacts in mandatory Class I Federal areas in accordance with the regional haze rules.

State Implementation Plan (SIP): A CAA required document in which States adopt emission reduction measures necessary to attain and maintain NAAQS, and meet other requirements of the Act.

Suppression: A management action intended to protect identified values from a fire, extinguish a fire, or alter a fire's direction of spread.

Tribal Implementation Plan (TIP): A document authorized by the CAA in which eligible tribes adopt emission reduction measures necessary to attain and maintain NAAQS, and

meet other requirements of the CAA for lands within tribal jurisdictions.

Violation of the PM NAAQS: As revised in 1997, the daily PM₁₀ standard is violated when the 99th percentile of the distribution of 24-hour concentrations for a period of 1 year (averaged over 3 calendar years) exceeds 150 µg/m³ at any monitor within an area. The annual PM₁₀ standard is violated when the arithmetic average of 24-hour concentrations for a period of 1 year (averaged over 3 calendar years) exceeds 50 µg/m³ at any monitor within an area.

The new NAAQS levels for PM_{2.5} are set at a daily concentration less than or equal to 65 µg/m³, and an annual mean concentration of less than or equal to 15 µg/m³. The daily standard is violated when the 98th percentile of the distribution of the 24-hour concentrations for a period of 1 year (averaged over 3 calendar years) exceeds 65 µg/m³ at any monitor within an area. The annual standard is violated when the annual arithmetic mean of the 24-hour concentrations from a network of one or more population-oriented monitors (averaged over 3 calendar years) exceeds 15 µg/m³. Compliance with the annual PM_{2.5} NAAQS is based on population-oriented monitors because the health information, upon which the standard is based, relates area-wide health statistics to area-wide air quality as measured by one or more monitors.

Volatile Organic Compounds (VOC): Any organic compound which participates in atmospheric photochemical reactions, which are measured by a reference method, an equivalent method, or an alternative method. Some compounds are specifically listed as exempt due to their having negligible photochemical reactivity. [See 40 CFR 51.100.] Photochemical reactions of VOC's with oxides of nitrogen and sulfur can produce O₃ and PM.

Wildfire: An unwanted wildland fire.

Wildland: An area where development is generally limited to roads, railroads, power lines, and widely scattered structures. The land is not cultivated (i.e., the soil is disturbed less frequently than once in 10 years), is not fallow, and is not in the United States Department of Agriculture (USDA) Conservation Reserve Program. The land may be neglected altogether or managed for such purposes as wood or forage production, wildlife, recreation, wetlands or protective plant cover. **[The distinction between wildlands, to which the recommendations in this document apply, and agricultural lands is subject to further discussion.]**

Wildland Fire: Any non-structural fire, other than prescribed fire, that occurs in the

wildland. Note: Wildland fires include unwanted (wild) fires and naturally ignited fires that are managed within a prescription to achieve resource benefits.

Wildland Fire Situation Analysis (WFSA): A real time decision-making process carried out by federal land management agencies to select an appropriate management response to wildland fire. The WFSA considers fire fighter and public safety, risk to property and resources, fire fighting resources available, land management objectives and environmental, social economic and political constraints. The environmental and social constraints considered include, among other things, how air quality and/or visibility will be affected at sensitive receptors by each alternative fire management strategy.

Wildland/Urban Interface: The line, area or zone where structures and other human development meets or intermingles with the wildland.

4.4 Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide

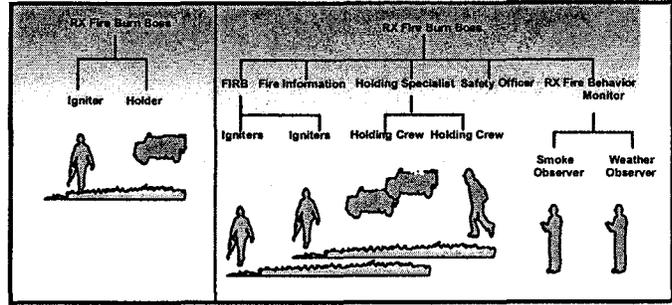
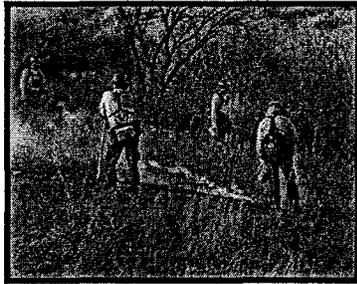
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AIR POLLUTION CONTROL PGM

Interagency Prescribed Fire

Planning and Implementation Procedures Reference Guide



PRESCRIBED FIRE PLAN

ADMINISTRATIVE UNIT(S): _____

PRESCRIBED FIRE NAME: _____

PREPARED BY: _____ DATE: _____
Name & Qualification

TECHNICAL REVIEW BY: _____ DATE: _____
Name & Qualification

COMPLEXITY RATING: _____

APPROVED BY: _____ DATE: _____
Agency Abbreviation



September 2006

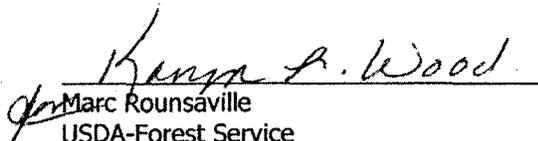
Foreword

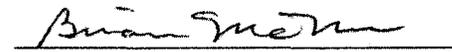
"Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide" (2006 Guide) provides standardized procedures, specifically associated with the planning and implementation of prescribed fire. These procedures meet all policy requirements described in the 2003 **Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy**. The 2006 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).

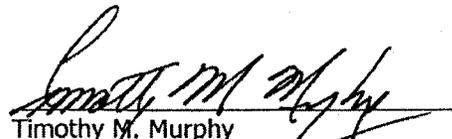
Prior to implementing Prescribed Fire under the standards in the 2006 Guide, local units must have ensured compliance with National Environmental Policy Act (NEPA), National Historical Preservation Act (NHPA) and Endangered Species Act (ESA) requirements.

This Implementation Procedures Reference Guide (2006 Guide) meets requirements of National Fire and Aviation Executive Board (NFAEB) 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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Chief

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 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, 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 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.