

National Park Service Wildland Fire Management Policy: Director's Order #18

Approved: Robert Stanton, Director, National Park Service

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1. BACKGROUND AND OBJECTIVES

National Park Service wildland fire management activities are essential to the protection of human life, personal property and irreplaceable natural and cultural resources, and to the accomplishment of the NPS mission. High safety risks and expenses associated with fire management activities require exceptional skill and attention to detail when planning and implementing fire management activities.

Interagency recognition of risks and expenses associated with wildland fire management culminated in a December 1995 Final Report of the Federal Wildland Fire Management Policy and Program Review, issued by a team of fire management experts. The Secretary of the Interior has accepted and endorsed the principles, policies, and recommendations contained in the report, and has directed the NPS to implement them.

The objectives of this Director's Order are to: (1) institutionalize within the NPS the new policies, organizational and operational relationships, and changes in law and reporting requirements reflected in the report; and (2) establish a framework by which the NPS will implement the report's principles, policies, and recommendations. The provisions of this Director's Order supercede all previous NPS instructions, requirements and statements of policy relating to wildland fire management that may be in conflict.

2. LEGAL AUTHORITY FOR THIS DIRECTIVE

16 U.S.C. 1 through 4.

3. NPS MANAGEMENT POLICIES

NPS Management Policies (beginning at chapter 4, page 14) governing fire management in the National Park System are hereby rescinded and replaced with the following:

Park Fire Management Programs

Wildland fire may contribute to or hinder the achievement of park management objectives.

Therefore, park fire management programs will be designed to meet resource management objectives prescribed for the various areas of the park and to ensure that firefighter and public safety are not compromised. Each park with vegetation capable of burning will prepare a fire management plan to guide a fire management program that is responsive to the park's natural and cultural resource objectives and to safety considerations for park visitors, employees, and developed facilities. The Environmental Assessment developed in support of the fire management plan will consider effects on air quality, water quality, health and safety, and natural and cultural resource management objectives. Until a fire management plan is approved, parks must aggressively suppress all wildland fires, taking into account the resources to be protected and firefighter and public safety. Suppression activities within wilderness, including the categories of designated, recommended, potential, proposed, and study areas, will be conducted in keeping with "minimum requirement" protocols identified in Director's Order #41, Wilderness Preservation and Management.

All fires burning in natural or landscaped vegetation in parks will be classified as either wildland fires or prescribed fires. All wildland fires will be effectively managed, considering resource values to be protected and firefighter and public safety, using the full range of strategic and tactical options as described in an approved fire management plan. Prescribed fires are those fires ignited by park managers to achieve resource objectives and will include monitoring programs that record fire behavior, smoke behavior, fire decisions and fire effects, to provide information on whether specified objectives are met.

All parks will use a systematic decision making process to determine the most appropriate management strategies for all unplanned ignitions, and for any prescribed fires that are no longer meeting resource management objectives. Parks lacking an approved fire management plan may not use resource benefits as a primary consideration influencing selection of a suppression strategy, but they must consider the resource impacts of suppression alternatives in their decision.

The full range of suppression strategies will be considered by superintendents guiding suppression efforts. Methods used to suppress wildland fires should minimize impacts of the suppression action and the fire, commensurate with effective control and resource values to be protected. Park superintendents must address the need for adequate funding and staffing to support fire management operations.

4. OPERATIONAL POLICIES AND PROCEDURES

4.1 The NPS is committed to protecting park resources and natural ecological processes; but firefighter and public safety must be the first priority in all fire management activities.

4.2 NPS fire management activities will be performed in accordance with the principles, policies, and recommendations of the Final Report of the Federal Wildland Fire Management Policy and Program Review, and with Part 620 of the Departmental

Manual. Air operations during wildland fire incidents will comply with the provisions of Director's Order #60 (Aviation Management) and Parts 350-354 of the Departmental Manual

4.3 All naturally caused wildland fires may be managed to accomplish resource management goals, provided there is an approved fire management plan, and provided they do not compromise firefighter and public safety, threaten property, or violate air quality laws or regulations.

4.4 To implement NPS Management Policies governing fire management, the NPS will administer its wildland fire program in a manner that will:

a) Achieve maximum overall benefits and minimize damages of wildland fire use within the framework of land use objectives and resource management plans, while giving primary consideration to firefighter and public safety.

b) Educate employees and the public about the scope and effect of wildland fire management, including fuels management, resource protection, prevention, hazard/risk assessment, mitigation and rehabilitation, and fire's role in ecosystem management.

c) Stabilize and prevent further degradation of natural and cultural resources lost in and/or damaged by impacts of wildland fires and/or fire management activities.

d) Maintain the highest standards of professional and technical expertise in planning and safely implementing an effective wildland fire management program.

e) Integrate fire management with all other aspects of park management.

f) Manage wildland fire incidents in accordance with accepted interagency standards, using appropriate management strategies and tactics and maximize efficiencies realized through interagency coordination and cooperation.

g) Scientifically manage wildland fire using best available technology as an essential ecological process to restore, preserve, or maintain ecosystems and use resource information gained through inventory and monitoring to evaluate and improve the program.

h) Protect life and property and accomplish resource management objectives, including restoration of the natural role of fire in fire-dependent ecosystems.

i) Effectively integrate the preservation of wilderness including the application of "minimum requirement" management techniques into all activities impacting this resource.

4.5 The Associate Director for Park Operations and Education will represent, and act on behalf of, the NPS on the Interagency Management Oversight Team.

4.6 The Associate Director for Park Operations and Education will prepare and issue a reference manual to help NPS managers and field staff understand and implement

reference manual to help NPS managers and field staff understand and implement Departmental and NPS policies applicable to fire management. The reference manual will contain detailed procedures emphasizing personnel safety, the use of wildland fire for beneficial purposes, monitoring of smoke behavior and the concept of risk management.

4.7 The superintendent of each park having burnable vegetation will ensure that the manual referenced in paragraph 4.6 (Reference Manual - 18) is available in sufficient quantities to serve the needs of fire management staff within the park, and will ensure that fire management staff is adequately versed in the Departmental and NPS policies and procedures contained therein.

4.8 NPS employees will take advantage of appropriate opportunities to educate the public about the positive values of wildland fire and the manner in which the NPS manages fire to meet ecosystem management objectives.

4.9 The Associate Director for Natural Resource Stewardship and Science will develop, in concert with the Associate Director for Park Operations and Education: (1) a research program to address scientific information needs, technological needs and advances, risk assessment, social and economic concerns, and public health concerns; (2) procedures to ensure that park resource management plans adequately take into account the positive values of wildland and prescribed fire as a tool for ecosystem management; and (3) a primer to assist all NPS personnel in accomplishing the objective of paragraph 4.8.

5. PROGRAM REQUIREMENTS

To further implement NPS Management Policies governing fire management activities, and to comply with the principles, policies, and recommendations of the Final Report of the Federal Wildland Fire Management Policy and Program Review and Part 910 of the Departmental Manual, the NPS adopts the following program requirements:

5.1 Safety and Health

- a) Firefighter and public safety is the first priority in all fire management activities.
- b) Fire personnel will meet appropriate qualifications for incident assignments, including medical requirements.
- c) Fire personnel will be equipped with personal protective equipment appropriate to their incident assignments.
- d) Fire personnel, including cooperators, will comply with National Wildfire Coordinating Group (NWCG) and NPS fitness and personal protective equipment standards while assigned to fire incidents. Mutual aid cooperators, responding to NPS fires under Memoranda of Agreement, will meet their respective personal protective equipment and qualification standards during initial action operations. However, during project fire or extended operations, cooperators will meet NWCG equipment and qualification standards.

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- e) Fire personnel assigned to fireline operations will complete a minimum of 32 hours of basic wildland fire training, and then annually a minimum of 8 hours of refresher safety training prior to incident assignments.
- f) No "live fire" shelter training exercises will be conducted or condoned by the NPS.
- g) All wildland fire incidents which result in human entrapment, fatalities, or serious injuries, or result in incidents with potential for the above (see RM-18 for definition), will be reported and investigated. Pending initial assessment, those directly involved in the event to be investigated will be removed from fireline duties as soon as practical, and will be made available for interview by the investigation team. Appropriate administrative actions will be taken subsequent to a full investigation.
- h) All safety standards and guidelines identified within the Interagency Incident Business Management Handbook will be followed.
- i) Management of all wildland fire incidents will comply with interagency risk management standards.
- j) The Job Hazard Analysis process will be used for potentially hazardous fire management activities, and for jobs which require employee use of out-of-the-ordinary personal protective equipment. See Reference Manual 18 for Job Hazard Analysis process and format.

5.2 Fire Management Plans.

- a) Every park area with burnable vegetation must have a fire management plan approved by the superintendent.
- b) All approved fire management plans will:
 1. Reinforce the commitment that firefighter and public safety is the first priority.
 2. Describe wildland fire management objectives which are derived from land, natural, and cultural resource management plans and address public health issues and values to be protected.
 3. Address all potential wildland fire occurrences and consider the full range of wildland fire management actions.
 4. Promote an interagency approach to managing fires on an ecosystem basis across agency boundaries and in conformance with the natural ecological processes and conditions characteristic of the ecosystem.

5. Include a description of rehabilitation techniques and standards that comply with resource management plan objectives and mitigate immediate safety threats.
 6. Be developed with internal and external interdisciplinary input and reviewed by appropriate subject matter experts and all pertinent interested parties, and approved by the park superintendent.
 7. Comply with the National Environmental Policy Act (NEPA) and any other applicable regulatory requirements.
 8. Include a wildland fire prevention analysis and plan.
 9. Include a fuels management analysis and plan.
 10. Include procedures for short and long term monitoring to document that overall programmatic objectives are being met and undesired effects are not occurring.
- c) Until a Fire Management Plan is approved, park areas must take an aggressive suppression action on all wildland fires, taking into account firefighter and public safety and resources to be protected within and outside the park.
- d) Although resource impacts of suppression alternatives must always be considered in selecting a fire management strategy, resource benefits cannot be a primary consideration unless there is an approved Fire Management Plan.

5.3 Interagency Coordination.

- a) All park areas will comply with the National Interagency Mobilization Guide in all applicable aspects for wildland fire management.
- b) Superintendents will pursue mutual assistance agreements with nearby fire management units of Federal, state, local and Tribal agencies. All agreements involving an obligation of funds or assumption of liability must be reviewed by a solicitor for legal sufficiency.

Procedures established by the NPS Contracts and Property Management Program will be followed if NPS funds will be obligated.

5.4 Training, Qualifications, and Certification.

- a) All NPS employees assigned dedicated fire program management responsibilities at the park, regional, or national level shall meet established interagency and NPS competencies (knowledge, skills and abilities) and concomitant qualifications.
- b) All NPS employees assigned to wildland fire management incidents will meet the training and qualification standards set by the National Wildfire Coordinating Group

- c) NPS wildland fire qualifications standards for positions other than those defined in NWCG 310-1 will be defined and maintained on the DOI Incident Qualification System.
- d) All wildland fires will be managed by an individual qualified and certified at the command level appropriate to the complexity level of the incident.
- e) All agency administrators are responsible for verifying and certifying that their employees meet the identified position qualification standards.
- f) All NPS employees involved in wildland fires certified at or above Single Resource Boss/Unit Leader will have their qualification records entered into and maintained annually on the DOI Incident Qualification System.
- g) All NPS employees involved in wildland fires will meet the physical fitness standards established for those positions for which they are qualified, as defined in the DOI Incident Qualification System.

5.5 Preparedness

- a) Preparedness planning must be developed annually at the park, regional and national levels. As a minimum, preparedness planning must address permanent and temporary staffing requirements for the normal fire year and for managing fire use, a step-up staffing plan, cache management, equipment needs, training, qualifications, preseason risk analysis, dispatch, detection, initial attack, agreements, and pre-attack planning.
- b) During periods when conditions exceed those of the normal fire year, severity planning may be developed and implemented on a local, regional, and national interagency basis.
- c) All agency administrators will ensure that trained and certified employees are made available to participate in wildland fire management activities, as the situation demands, and that employees with operational, administrative, or other skills support the wildland fire program as needed.

5.6 Prescribed Fire Operations

- a) The use of prescribed fire is permissible only when a Fire Management Plan that authorizes and describes such activities has been completed and approved.
- b) All prescribed fire activity will comply with applicable Federal, state and local air and water quality laws and regulations.

5.7 Prescribed Burn Plans

- a) All prescribed fire projects will have a burn plan approved by the superintendent.
- b) All burn plans will be prepared using a systematic decision-making process, and contain measurable objectives, predetermined prescription, and environmental compliance documentation.
- c) Contingency actions must be described in the event the prescription is exceeded.
- d) All burn plans will address the need for alerting park neighbors and appropriate public officials to the objectives and timing of the planned burn.

5.8 Prescribed Fire Monitoring

- a) Fire effects monitoring must be done to evaluate the degree to which objectives are accomplished.
- b) Long-term monitoring is required to document that overall programmatic objectives are being met and undesired effects are not occurring.
- c) Evaluation of fire effects data is the joint responsibility of fire management and natural resource management personnel.

5.9 Fuels Management

- a) Park areas will identify, manage, and reduce where appropriate, accumulations of hazardous fuels.
- b) Wildland fire use, prescribed fire, and non-fire techniques are appropriate tools for reducing hazardous fuels.
- c) Park areas will reduce, to the extent possible, hazardous fuels in the wildland/urban interface.
- d) All NPS design and construction projects will consider wildland fire prevention, protection capability and mitigation measures to reduce potential for adverse impacts of wildland fire. Mitigation measures include, but are not limited to, site location (e.g., position on slope, setback from slope) and fuels management within the vicinity of development.
- e) Design and project costs must include mitigation measures and incorporate mitigation measures in environmental compliance documentation.

f) All park programs to manage accumulations of hazardous fuels must be identified in the park resource management plan and must be the subject of an appropriate level of NEPA and cultural resource protection compliance.

g) Fuels management project rehabilitation is inappropriate in the NPS.

5.10 Debris Disposal

a) An important goal of national park management is the maintenance of clean air and clear visibility. With that in mind, if it is deemed infeasible or impracticable to mechanically remove debris, wildland fire may be used as a routine maintenance activity to dispose of naturally occurring debris or debris generated from other maintenance actions, construction activities, or the removal of hazardous trees or discarded building and administrative materials.

b) All debris burning activities will be reviewed by a fire management officer.

c) All construction contracts/projects which produce vegetation debris will specify when and how the material will be disposed of, and will be reviewed by the fire management officer.

d) Wildland fire qualified personnel and a formal prescribed fire burn plan are not necessary for debris burning projects, unless review by a fire management officer indicates a potential forescape.

e) Debris burning will not be reported through the DI-1202 process unless the burn escapes the designated project area.

f) All debris burning activities will be conducted in compliance with local, state, and federal air quality requirements and permits.

5.11 Certification

a) For each wildland fire being managed for resource objectives under an operational management plan, the park superintendent is required to certify daily that the management strategy continues to meet overall management objectives.

b) Daily certification authority may be re-delegated to specific incident management positions as appropriate.

c) If selection of a new management alternative is needed, certification authority will automatically and immediately revert to the park superintendent.

5.12 Evaluation and Reviews

- a) All wildland fires and fire-related incidents will be reviewed by the appropriate management level.
- b) All entrapments and fire shelter deployments will be reviewed by an interagency investigation team.
- c) All personnel assigned to any wildland fire will receive a performance evaluation. The evaluation will be verbal or written commensurate with the complexity of the incident. Written documentation of unsafe or substandard and exemplary performance is mandatory.
- d) The Associate Director, Park Operations & Education, will convene an ad-hoc team to review Service-wide fire management programs subsequent to the occurrence of any significant, controversial or unusual wildland fire management activities.
- e) All prescribed fires will be reviewed as appropriate.

5.13 Burned Area Emergency Rehabilitation

- a) Emergency rehabilitation will be carried out on all wildland fires as necessary to prevent land degradation and resource damages and mitigate unsafe conditions caused by the wildland fire or by actions taken to suppress the fire.
- b) The Department's BAER Handbook will be the primary source of guidance on BAER policies and procedures, and will be implemented as prescribed in this Director's Order and Reference Manual-18.
- c) The NPS will utilize the least intrusive BAER actions required to mitigate actual or potential damage caused by wildland fire. Erosion following wildland fire is an element of natural landscape change and should not necessarily be viewed as a deleterious effect, especially in natural areas.
- d) Natural recovery by native plant species is preferable to seeding. Seeding should be used only when approved to prevent unacceptable erosion or to resist competition from exotics or invasive species.
- e) Mitigation of fire suppression activity damage will be specified in incident action plans.
- f) Burned area emergency rehabilitation plans will be prepared as necessary to specify long-term actions for mitigating the deleterious effects of wildland fires.
- g) Planning, funding, and timing requirements for fire suppression activity damage and

g) Training, funding, and timing requirements for fire suppression activity damage and burned area emergency rehabilitation as specified in Reference Manual-18.

5.14 Research

a) Research programs will be developed on an interagency basis, addressing scientific information needs, technological needs and advances, risk management, social and economic concerns, and public health concerns.

b) Research findings will be used to provide a sound basis for the integration of wildland fire into land-use and resource management activities.

5.15 FIREPRO Analysis

a) FIREPRO funds are provided through the Department of the Interior firefighting account (P.L. 101-121, Department of the Interior and Associated Agencies Appropriation Act, 1990), which may be supplemented by the emergency authority provisions of Section 102 of the Department of the Interior Appropriation Act. FIREPRO funds are non-ONPS, no-year funds which will be distributed to parks and Support Offices by the NPS Fire Management Program Center, through WASO Budget. FIREPRO funds will be managed through the use of unique cost account codes established for the various wildland fire management program activities and cannot be used to fund personnel or activities not directly supporting wildland fire management.

b) All FIREPRO funding activities must comply with all instructions prescribed in Reference Manual-18 and the FIREPRO USER'S GUIDE.

5.16 Fire Business and Personnel Management

a) The need to expedite operations in the wildland fire management program, combined with the interagency nature of the program, has resulted in a body of law and business and personnel management practices that are quite different from those that normally apply to NPS operations. Those who are involved in managing wildland fire activities must be knowledgeable of the laws and practices that apply to their responsibilities.

b) All fire business and personnel management activities must comply with all instructions prescribed in Reference Manual-18, Fire Management Compendium, Interagency Incident Business Management Handbook (NWCG Handbook 2), and 5 CFR, parts 550, 551 and 532.
