**APPENDIX A**

**National Direction**

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| --- | --- | --- | --- | --- |
| File Code: | 5100 | | Date: | May 5, 2011 |
| Route To: |  | | | |
|  |  | | | |
| Subject: | 2011 Fire Season Expectations | | | |
|  |  | | | |
| To: | Regional Foresters, Station Directors, Area Director, IITF Director and Deputy Chiefs | | | |
|  | |  | | |

The Chief shared his expectations for the 2011 fire season while connecting to safety and our relationship with communities in his 5100; Chief’s Letter of Intent – 2011 Fire Season memo dated March 22, 2011. This letter and the enclosed Interim Guidance for Wildfire Response tie to and complement the Chief’s message. Combined, these documents outline my specific expectations for the 2011 fire season and our response to wildfires (unplanned ignitions). As with the Chief, managing risk to prevent serious injury and fatalities is my number one objective.

Our wildland fire strategy for fiscal year 2011 requires a risk informed response for all fires. Operationally, this means that the Agency Administrator is responsible for making risk informed decisions based in risk assessment, analysis, communication and information sharing.

To continue to learn from our actions and decisions and show success in meeting our objectives, we must evaluate and document our wildfire responses. For every incident significant questions must be asked: What is at risk? What are the potential consequences? What exposure of responders will be expended to achieve the outcome? Then we must ask, post-incident: How effective was the response? How efficient was the response?

To ensure accountability and understand how risk is being assessed and analyzed, we will ask for an accounting of response efforts. Effective June 1, 2011, regions will provide two items for all Type 1 and 2 fires: 1) a risk assessment and; 2) a document signed by the accountable Agency Administrator detailing analysis and factors weighed in making the risk decision. The FY 2011 Risk Assessment is enclosed. To give more detail about requirements for accounting for wildland fire response, your assessment and analysis should consider information asked for on page 2 of the previously issued Incident Commander Performance Evaluation form. Copies of the FY 2011 Risk Assessment and page 2 of the Incident Commander Performance Evaluation form should be forwarded to the Assistant Director of Fire and Aviation Management, Planning & Budget.

With this information, we will lay the basis for displaying the risk exposure of our wildfire response and developing accountability of our risk decisions in wildfire management so we can continue learning from our actions and decisions.

Regional Foresters, Station Directors, Area Director, IITF Director and Deputy Chiefs 2

The enclosed Interim Guidance for Wildfire Response also details the FLAME and Severity Regional submission process required for FY 2011. This will be the only guidance for FY 2011 regarding the submission process released by the WO for these programs.

Please contact Tom Harbour, Director, Fire and Aviation Management, at [tharbour@fs.fed.us](mailto:tharbour@fs.fed.us) or (202) 205-1483 for additional clarification.

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|  |
| */s/* ***James E. Hubbard*** |
| JAMES E. HUBBARD |
| Deputy Chief, State and Private Forestry |

Enclosures

cc: pdl wo spf fam regional fire directors, pdl wo spf fam ad's only, pdl wo B&F budget, coordinators, pdl wo B&F budget officers, Richard Kvale, Victoria C Christiansen, pdl wo spf fam leadership

**INTERIM GUIDANCE FOR WILDFIRE RESPONSE**

**USDA Forest Service**

Our wildland fire strategy for fiscal year 2011 requires a risk informed response for all fires. Consistent with the “Guidance for the Implementation of Federal Wildland Fire Policy” issued February 13, 2009, (<http://fsweb.wo.fs.fed.us/fire/fam/firepolicy/index.htm>), the following key elements based in doctrine, principles, and risk management, will guide our actions for the future. The February 2009 Guidance provides for flexibility in managing wildfires; it also provides broad authorities in development and use of wildfire objectives.

Our first responsibility on every fire is firefighter and public safety (FSM 5100).

As a reminder, there are only two types of wildland fires: wildfires and prescribed fires. The terms “fire use fires,” “resource benefit fires,” or “suppression fires” will not be used. The agency reports activity on only these two types of fire. Within this characterization:

1. All wildfires will have a protection objective. Incorporate the potential for threat to life and property in initial and subsequent courses of action on every fire.
2. A wildfire may be concurrently managed for more than one objective.
3. Unplanned natural ignitions may be managed to achieve Land and Resource Management Plan objectives when risk is within acceptable limits. Risk is elevated and uncertain on longer duration incidents.
4. Human caused fires and trespass fires will continue to be suppressed safely and cost effectively and will not be managed for resource benefits.

Agency Administrators will ensure that all Forest Service employees and employees of interagency partners working on Forest Service jurisdiction wildfires clearly understand direction.

Agency Administrators must approve a decision analysis (and subsequent courses of action) and issue delegations of authority to the incident commander. The agency administrator authority is based on the complexity level as follows:

* Type 3, 4, and 5 wildfire decisions/delegations are made at the District Ranger level with oversight by the Forest Supervisor.
* Type 2 wildfire decisions/delegations are made at the Forest Supervisor level with oversight by the Regional Forester.
* Type 1 wildfire decisions/delegations are made at the Regional Forester level with National oversight.\*
  + \*This authority may be delegated to the next level provided that agency administrator at the lower level meets the certification requirements established by the Fire & Aviation Management Line Officer Team.**Severity**

Severity funding authorizations will continue to allow for fire activities that occur outside normal regional fire season conditions. Our first reliance has been and will continue to be on our preparedness funds first to meet suppression activity needs. Regional Foresters and Director, Fire and Aviation Management (FAM) severity authority will remain as in past years. Such authorizations are limited to $80,000 per occurrence. All authorizations in excess of $80,000 will be issued by the Deputy Chief, State and Private Forestry. These authorizations will be in effect until rescinded or modified.

The FY 2011 agency limitation for severity expenditures is $35 million. In the unlikely event that conditions warrant expenditures over this amount, an analysis will be completed by the WO staff in collaboration with the requesting Region(s) and will be presented to the Chief for consideration. Unit limitations are depicted in the table below and reflect an upper limit and are not to be considered an allocation. The WO reserve account was established to accommodate the Department of the Interior support and will facilitate adjustments to regional limitations if needed.

**FY 2011 Severity Limitation ($1000’s)**

|  |  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| UNIT | WO Reserve | Region 1 | Region 2 | Region 3 | Region 4 | Region 5 | Region 6 | Region 8 | Region 9 | Region 10 |
| Limitation | $11,000 | $1,900 | $1,400 | $3,000 | $1,900 | $8,700 | $3,400 | $3,000 | $600 | $100 |

**FLAME Act and 2011 NWCG Complexity Analysis/Organizational Needs Assessment**

The threshold for fires that may be eligible for funding through the FLAME Act of 2009 are fires at least 300 acres in size and managed by a Type I or Type II IMT. Regions will be required to submit the following information to FLAME@fs.fed.us for all FLAME fires:

1. Incident job code
2. Incident number
3. Name of the fire
4. Type of team(s) that was actually mobilized to the fire
5. New NWCG Complexity Analysis/Organizational Needs Assessment

The 2011 NWCG Complexity Analysis is used to inform the decision about the complexity level of incident organization to request for a wildland fire. It does not direct a specific action and allows Agency administrators and fire staffs to evaluate each situation and collaborate on a course of action. While the NWCG Complexity Analysis has not been incorporated into the Wildland Fire Decision Support System (WFDSS) yet, it will be as soon as the software development schedule permits. In the interim, the NWCG Complexity Analysis can be uploaded into WFDSS or remain as a stand-alone document. The Revised Complexity Analysis/ Organizational Needs Assessment is found at:

<http://www.nwcg.gov/general/memos/nwcg-042-2010.pdf>

**Risk Management**

There is great uncertainty in today’s wildland fire environment where inherent risks can take lives and harm values. Dealing with uncertainty and intrinsic hazards demands an aggressive risk management approach. Therefore, to insure success, we must make risk informed wildland fire response decisions that include discussions with our stakeholders. Success depends on making the right response in the right way.

The Washington Office-FAM will continue to provide Operational Risk Management (ORM) sessions for the forests with the highest risk exposure potential. The objectives are to increase the awareness of risk management as an overall part of decision making and to be able to communicate those risks and decisions to our employees, the public, our cooperators and our superiors. It is expected that employees from every level of the organization attend the ORM sessions and understand the concepts of risk analysis and impacts of risk based decisions.

To ensure accountability and understand how risk is being assessed and analyzed we will ask for an accounting of response efforts. Effective June 1, 2011, regions will provide two items for all Type 1 and 2 fires: 1) a risk assessment and; 2) a document signed by the accountable Agency Administrator detailing analysis and factors weighed in making the risk decision. FY 2011 Risk Assessment is enclosed for your use. To provide more detail concerning requirements for accounting for wildland fire response, your assessment and analysis should consider information asked for on page 2 of the previously issued Incident Commander Performance Evaluation form. Copies of the FY 2011 Risk Assessment and page 2 of the Incident Commander Performance Evaluation form should be forwarded to the Assistant Director of Fire and Aviation Management, Planning & Budget.

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**Long Duration Wildfire**

Oversight roles include ensuring we understand the inherent risk and uncertainty in managing wildfires for any duration; it is essential we:

* Make risk assessments of potential undesirable outcomes;
* Develop suppression strategies for protection of life and property from low probability/high consequence events;
* Complete up-to-date decision analyses and document using the Wildland Fire Decision Support System (WFDSS);
* Identify hazards and risk assessments to inform decisions;
* Coordinate with partners and potentially affected parties (including smoke impacts);
* Implement unified command early if necessary;
* Determine resource capacity and availability to meet realistic expectations;
* Manage smoke impacts to maintain social support for using wildfire to meet resource objectives

On all wildfires, but especially on long duration wildfires, develop specific protection objectives and suppression strategies to keep the fire from crossing property lines where it is *unwanted.* When all parties are in agreement with the course of action, they should agree that if events transpire that moves the fire across the property boundary, parties will engage in negotiating cost share agreements following direction in Chapter 80 of Interagency Incident Business Management Handbook (NFES 2160). Because of differences in mission, there may be times when our state or federal partners won’t agree with appropriate management decisions that are entirely within NFS lands. Document those disagreements, and evaluate the risk associated with those disagreements in the context of low probability of occurrence and high consequence event analyses. In those cases where agreement is not reached regarding a course of action and the worst case scenario occurs (fire goes across jurisdictional boundaries), the result could be the Forest Service potentially expending a portion of, or all suppression costs incurred.

**Documentation and Analysis**

WFDSS will be used for decision support documentation. All wildfires must be reported in WFDSS, including fires which come onto agency lands that have not been previously entered into the system. Wildfires that exceed initial attack will have a published decision within WFDSS. The WFDSS involves a process of fire documentation and analysis for the agency administrator to describe the basic fire situation, create incident objectives and requirements, develop a course of action, validate key dependencies, and evaluate risks. WFDSS allows the display of the fire situation, quantify values at risk, perform fire behavior predictions, and develop management strategies. Combined, these features allow the agency administrator to make informed decisions for management of the incident considering safety, complexity, risk and economics.

Periodic assessments throughout the duration of the fire incident will be completed in WFDSS, which evaluate response strategies and other factors for wildfires managed by the agency. The assessment frequency must be approved by the responsible agency administrator and will not exceed fourteen (14) days. To ensure the most effective response is utilized throughout the life of the fire incident, re-analyze data and adjust decisions and actions frequently based on decision support criteria within WFDSS.

Report changed vegetative conditions as Hazardous Fuels accomplishments from wildfires *after completion of post fire assessment* into FACTS (Forest Service Activity Tracking System). Report the total number of acres indentified as meeting desired condition as activity code 117 Wildfire-Natural Ignition, and coded as key point 6, per 2011 Final Program Direction. Human caused fires will not be reported as accomplishment acres in FACTS.

**Safety Reviews, Analyses, and Investigation Guidance**

As risk managers we provide leaders intent and manage risk to limit unnecessary and ineffective exposure of firefighters. Serious accidents and fatalities are the most difficult events we encounter. We have Agency policies and requirements to assist us with the procedures for notification and respectfully dealing with serious accidents and fatalities, FSM 6730.

The Forest Service endorses the position that we are a learning organization. Our basic doctrinal approach requests Agency Administrators to ask "what must I learn because of this event?" and as a corollary "what must I do because of this event?"

In deciding the appropriate type of incident review, Agency Administrators should consider the potential for learning what might prevent a reoccurrence and/or addresses Congressional and media interest, scope of public interest (local or national), and limit agency liability. To address the multiple objectives of the Forest Service, Agency Administrators should consider supporting multiple coordinated (even concurrent) reviews. The reviews must at a minimum provide an organizational learning opportunity to prevent a repeat of the incident, collect information that will be helpful in litigation and tort claim defense, and collect the data required in FSM 5140, FSM 5320, and FSM 6730. Data collected through a Facilitated Learning Analysis (FLA) or Accident Prevention Analysis (APA) can be used to meet the requirements of FSM 5140 and FSM 6730. The objective of each review or analyses must be communicated with the unit.

It is important to learn from all unintended outcomes, which is why we have a system of reviews, analyses, and investigations to assist in identifying, preventing, and understanding factors that may prevent future accidents and injury. It is important to select and apply the appropriate tool to meet desired objectives; guidance can be found in the Organizational Learning “Lessons Learned” Analysis Options found in the letter of August 10, 2009 (<http://www.wildfirelessons.net/documents/Org_Learning_72009.pdf>). Tools available include APA, FLA, and Administrative Investigations.

Reviews, investigations, and analyses will be coordinated with the next higher level of organizational authority for concurrence of tools/actions/decisions.

**Collaboration and Planning**

Prior to and throughout fire season, discuss wildfire response with interagency partners and potentially affected landowners and communities.

ffort to ensure that the Pacific Southwest Region is following the direction contained in July 2011 Regional Forester’s Letter, the Chief’s Letter of Intent for the 2011 Fire Season (March 22, 2011), and Interim Guidance for Wildfire Response that was issued on May 5, 2011 by Deputy Chief Hubbard, the Regional office is providing this additional guidance.

**Incident Commander / Incident Management Team (IMT) Performance Evaluations**

It is essential that all IMT’s assigned to fires on your Forest receive a performance evaluation. The California Wildfire Coordinating Group (CWCG) has an approved Interagency IMT Evaluation which is posted at http://gacc.nifc.gov/oscc/cwcg/team/index.html

**Approval Authority for WFDSS Decisions**

Effective June 1, 2011 the WO issued new direction for agency administrator approval authority of Wildland Fire Decision Support System (WFDSS) decisions. The cost of the incident no longer drives the approval authority.  It is now driven by the Incident Management Team (IMT) type. This information is included on page 1 of the 2011 Interim Guidance for Wildfire Response.

**FLAME Act:**

In order to provide the Region with the correct information to submit for FLAME Act funding, please ensure that all fires managed by a Type 1 or 2 team have:

* Accurate incident information entered into WFDSS
* A completed Organizational Needs Assessment in WFDSS

An attached NWCG memo explains the implementation of and instructions on completing the Organizational Needs Assessment. Note that this capability is currently available in WFDSS. The Regional FAM Program Analyst will be responsible for gathering the required information from WFDSS for submission to the Washington Office.

**Risk Assessment / Risk Decision:**

To ensure accountability and understand how risk is being assessed and analyzed the WO is asking for accounting of those response efforts. Effective June 1, 2011 for all Type 1 and 2 fires, a risk assessment along with the factors weighed in making the risk decision must be completed by the responsible Agency Administrator. **To the maximum extent possible we would like the risk assessment/risk decision documentation requirements to be addressed in the WFDSS incident decision rationale.** In addition to leveraging the WFDSS program, it will strengthen decision rationale; prevent duplication by avoiding the need for a separate risk assessment/risk decision document and information request. Attached is a helpful hints document you may find useful in analyzing and documenting your risk assessment and risk decision process on page 3.

Note that the final 2 risk decision questions; *“How effective was the response?”* and *“How efficient was the response?”* are after action review questions which should be addressed in a timely manner once the fire is controlled. These questions can be answered in a WFDSS custom “Risk Assessment Summary” report that will also contain the decision rationale that previously addressed the other risk assessment and risk decision questions. Attached are instructions on how to create this custom “Risk Assessment Summary” report in WFDSS.

In addition the fire season expectation letter states *“To give more detail about requirements for accounting for wildland fire response, your assessment and analysis should consider information asked for on page 2 of the previously issued Incident Commander Performance Evaluation form.”* which is included below:

*“Wildland Fire Response Accounting by the Incident Commander”*

* *Final fire perimeter*
* *Direct line constructed*
* *Indirect line constructed*
* *Contingency line constructed*
* *Number of homes actively protected*
* *Other values actively protected via point protection*
* *A map documented in WFDSS with the above protection features delineated”*

Ensure that the last Type 1 or 2 Incident Commander assigned to the incident provide you this information at the end of their assignment. It is recommended your delegation of authority for the fire includes this information request to remind our incident commanders to keep records to meet this expectation. For reporting purposes this information should also be included in the WFDSS custom “Risk Assessment Summary” report mentioned above. Attached are instructions on how to include this information in the report. The Regional FAM WFDSS lead will be responsible for compiling the WFDSS reports and forwarding to the WO.

An example of the Risk Assessment / Risk Decision process based on a 2011 incident on the San Bernardino NF is available for viewing on the WFDSS Training site. Instructions on accessing this example are on page 5.

WFDSS specific related questions should be directed to Larry Hood at 530-841-4469 or Phil Bowden at 916-640-1119.

(1) Risk Assessment: (Tell Your Story in the WFDSS Decision Rationale, **required questions in bold**)

* **What can go wrong?**
* **What’s at risk?**
* **What is the probability that each value at risk will be harmed?**
* **What is the consequence of harm?**
* **What are the possible low probability/high consequence events?**

(2) Risk Decision: (Examples of factors used for your analysis but not limited to)

* **What analysis was made and factors weighed by the decision maker?**
* Serious Injury and/or Fatalities to Public and/or Firefighters
* Fire Behavior Modeling such as FSPRO
* Land and Resource Management Plan
* Watershed/Waterway Values
* Major Infrastructure
* Fire Behavior
* Weather
* Fuels
* WFDSS Relative Risk Analysis (values, hazard, probability)
* Cost
* Wildland Urban Interface
* Land and Property Ownership
* Complexity Analysis
* **What response alternatives were considered?**
* Suppression Response
* Land and Resource Management Plan
* Fire Management Plan
* Land and Property Ownership
* **What exposure will be required by responders for each alternative?**
* Use ICS 215 A as a tickler
* Identify Hazards
* Making a go/no-go decision based on acceptability of remaining risk
* Evaluate effectiveness of hazard controls and continue to re-evaluate
* **What course of action provides the best potential outcome with the least exposure to responders?**
* Full Suppression
* Point Protection
* Managed as a long duration incident
* **What was considered in the trade-off analysis?**
* Is there trade-offs related to your suppression, i.e. full suppression vs. long duration incident
* Management of Incident – Type 1, Type 2, Type 3?
* Availability of Resources
* Weather
* **How effective was the response?**
* Evaluate your response in a timely manner at containment
* **How efficient was the response?**
* Tell your story

(3) Other On-Going Risk Decisions:

* Daily decisions related to risk
* Change in fire behavior

**2011 R5 Risk Assessment / Risk Decision Example in WFDSS**

An example of the Risk Assessment and Risk Decision process is available for WFDSS users on the Training site. Note that while it mirrors a May, 2011 incident on the San Bernardino National Forest, it is only an example. Keep in mind that there are no right answers and the level of documentation can vary by fire complexity and duration.

1. Log on to WFDSS Training <https://wfdss.usgs.gov/training/faces/jsp/login/WFDSSLogin.jsp>
2. It is recommended that you create a filter to be able to refer to this example in the future (temporary filters go away when you log off).
3. On the **Incidents** tab, click **Edit Filter List,** and **Create New Filter** (bottom of page).
4. Fill in **Filter Name:** Suggest **“2011 R5 Risk Assessment Risk Decision Example”**.
5. Click the down arrow on **Incident Names.**  Type in **2011** and click **Apply Filters.**
6. Click on the chevron symbol in front of **2011 R5 Risk Assessment Example (BDF Momyer)** which will move it to the Incident Filter List on the right.
7. Click **Save Filter,** then **Return.**
8. Select your newly created filter from the **Incident Filter List** on top of the **Incidents** tab.

You can now **View Information** and see the risk assessment / risk decision questions and information in the **Decision Rationale** (Decision tab) and the **“07.05.2011 Risk Assessment Summary”** custom report (Reports tab).

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