

NATIONAL PARK SERVICE


Reference Manual #18: Wildland Fire Management

Chapter 7 – Fuels Management

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Prepared by the Branch of Wildland Fire

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FUELS MANAGEMENT

1 Introduction

The purpose of the National Park Service (NPS) fuels management program is to mitigate the risk of negative impacts from wildfire and/or restore and maintain healthy landscapes. This can be accomplished with improving resiliency to fire-related impacts, increasing ability of communities and infrastructure to withstand wildfire, and enhancing safe and effective wildfire response.

This chapter provides policy direction for all activities associated with fuels management planning and implementation. It also identifies specific programmatic requirements, responsibilities, and guidance relating to adaptive management.

2 Responsibilities

Additional responsibilities specific to prescribed fire are found in the [NWCG Standards for Prescribed Fire Planning and Implementation \(PMS-484\)](#).

2.1 National Level

- Represent the interests of NPS fuels management at the national level with interagency partners and other government and non-government agencies.
- Provide management oversight and lead the development of NPS policy for the fuels program.
- Determine the NPS portion by region of the Department of the Interior's fuels budget.
- Provide support as requested to the regions and parks.

2.2 Regional Level

- Develop and manage the regional fuels program of work.
- Assist parks with shared resources, contracts, and agreements.
- Distribute fuels funding to individual parks.
- Provide guidance, interpretation, and support for policy and strategy.

2.3 Park Level

- Propose, plan, and implement approved fuels treatments and activities.
- Use the Bureau approved planning and reporting system for developing the planned program of work and reporting fuels accomplishments.
- Ensure policy and standard practices are adhered to in all aspects of fuels management.
- Coordinate with other local partners and intra-park divisions to further the goals of the park's fuels management program.
- Provide employee developmental opportunities in the fuels program.
- Complete a fuels treatment effectiveness assessment into the Bureau approved planning and reporting system for all reportable wildfires that meet the criteria for fuel treatment effectiveness reporting.

3 Program Requirements

3.1 Fuels Management Compliance

All fuels management treatments and activities must comply with the National Environmental Policy Act (NEPA) and any other regulatory requirements (Endangered Species Act, the National Historic Preservation Act, the Clean Air Act, Wilderness Act, etc.). Additional information can be found in the [2015 NPS NEPA Handbook](#) and/or RM 18 Chapter 4.

NEPA is required on all lands when federal funding is utilized to implement treatments.

Determine if the proposed planned fuels project was adequately described within the scope (size, location, parameters) of the existing NEPA document and associated decision document (i.e., Environmental Assessment (EA), Finding of No Significance (FONSI); Environmental Impact Statement (EIS), Record of Decision (ROD) or Category Exclusion (CE). The document may not be appropriate when the NEPA document is outdated because new information or changed conditions require that the original decision and analysis be revisited.

- The Fuels Categorical Exclusion (CE) for the Healthy Forest Initiative (HFI) is available for use on all NPS lands except those units located in the 9th Circuit Court of Appeals jurisdiction (AK, AZ, CA, ID, MT, NV, OR,

WA). NPS units in the 9th Circuit Court of Appeals jurisdiction may not use the Fuels CE for the HFI.

- The Healthy Forests Initiative (HFI) Categorical Exclusion cannot be used to meet compliance requirements for chemical treatments.

Ensure site-specific analysis and consultation has been completed before fuels project implementation. Consult the park and/or Regional NEPA coordinator to determine the status and documentation of NHPA Section 106, ESA Section 7, Tribal consultation, floodplain/wetland statement of findings, Minimum Requirements Analysis Framework (MRAF) - Wilderness Connect For Practitioners, etc. Additional information can be found in the 2015 NEPA Handbook, section 4.14 Integrating NEPA with Other Environmental Review and Consultation Requirements.

3.2 Fire Management Plan (FMP)

All treatments must be supported by a valid FMP (see RM 18 Chapter 4, Fire Management Plans). A valid FMP is required to receive treatment or activity funding.

3.3 Fuels Budget Coordination and Formulation

The Department of the Interior fuels program priorities will be employed by National, Regional, and Park programs when developing, submitting, and prioritizing projects. The Office of the Secretary requires that DOI bureaus use a fuels budget prioritization system. The annual preparation of budget allocations and performance information necessitates a close and integrated working relationship among fire/fuels, budget, and other programs at all levels of the National Park Service.

3.4 Monitoring and Adaptive Management

All fuels management activities and treatments must be monitored to assess treatment effectiveness and to determine whether management objectives were met. Each NPS unit will utilize an adaptive management process to plan, implement, and evaluate the fuels management program.

The adaptive management process facilitates collaborative planning that is required for successful treatments that will continue to maintain integrity through time. Annual communication of monitoring results must occur between fuels treatment specialists and the fire ecology program. These results should also be shared with other concerned and interested decision-makers, resource

managers, and fire managers. Recommended actions also include scheduling annual meetings to evaluate the previous year's actions and results, discuss whether objectives were met, and develop consensus on current and future years' management actions. The evaluation process should include analysis of short- and long-term monitoring results, review and revision of objectives, operational feedback, and adjustments to management actions where needed.

See RM 18 Chapter 8, Fire Ecology and Monitoring for further information on adaptive management and fuels treatment monitoring requirements and recommendations.

3.5 Fuels Management Program Reviews

Agency Administrators (AA) ensure compliance with NPS policy and regional office direction for fuels management activities and confirm that reviews of the fuels management program are completed. Regional and national level reviews will be conducted at periodic intervals to ensure program effectiveness and consistency. The Fire Management Program Center (FMPC) maintains the protocols for conducting fire program reviews and are available in the [NPS Wildland Fire Program Review Guide](#). For more information see RM18 Chapter 16: Evaluations, Reviews, and Investigations

3.6 Defensible Space

The NPS has adopted the International Code Council's (ICC's) [International Urban-Wildland Interface Code](#) (see sections 603 and 604) for descriptions of defensible space and maintenance requirements for structures in wildland urban interface areas.

3.7 Personnel Qualifications, Work Capacity, and Certification

Agency fire personnel who plan and implement fuels treatments will meet the appropriate interagency position competencies, position qualifications in the NWCG PMS 310-1 or Federal Wildland Fire Qualifications Supplement, and work capacity fitness levels (see RM 18, Training, Qualifications, and Certification chapter). Additionally, incumbents of fuels program management positions are subject to the IFPM requirements as identified or referenced in their position description.

Operations personnel and equipment must have the ability to perform the assigned duties. Qualifications and/or certifications must be substantiated by past performance, documentation of appropriate skills or requisite certification, or the ability to fulfill contract specifications.

3.8 Financial Guidance

Specific guidance and direction for the fuels program budget planning and execution is contained within the NPS Wildland Fire & Aviation Budget Rules.

The following topics of interest to the fuels management program are covered in the Fuels Management section:

- WBS structure for fuels accounts
- Fuels Management
- Prescribed Fire Treatments
- Mechanical Treatments
- Other Treatments (e.g., chemical, biological)
- Compliance
- Monitoring
- Appropriate uses per fund source
- Fuels vehicle fleet maintenance
- Research

3.9 Fuels Treatment on Private Lands

Fuels treatment on private lands is authorized under the authority of the [Wyden Amendment \(P.L. 109-54\)](#), which is codified in [16 USC § 1011](#) of the Code of Federal Regulations (CFR), and more direct authority with the [2004 Department of the Interior Appropriation Act](#).

To comply with the CFR there must be a signed agreement with the landowner that:

- Includes such terms and conditions mutually agreed to by the NPS and the landowner.
- Stipulates improved viability of and otherwise beneficial to the fish, wildlife, and other biotic resources on public land in the watershed.
- Authorizes the provision of technical assistance by the NPS in the planning of management activities that will further the purposes of the agreement.
- Provides for the sharing of costs of implementing the agreement among the NPS, the landowner, and other entities, as mutually agreed on by the affected interests.
- Ensures that any expenditure by the NPS pursuant to the agreement is determined by the NPS to be in the public interest.

- Includes such other terms and conditions as are necessary to protect the public investment on private lands, provided such terms and conditions are mutually agreed to by the Service and the landowner.

An approved prescribed fire plan and qualified burn boss are required for NPS resources to participate in prescribed fires on non-NPS lands. The approved plan should meet the minimum requirements for a prescribed fire plan as described in the [NWCG Standards for Prescribed Fire Planning and Implementation \(PMS-484\)](#). The burn boss must meet National Wildfire Coordinating Group (NWCG) qualifications for a burn boss, or, in the case of agencies or entities that are not members of NWCG, be certified as a qualified burn boss by their sponsoring agency. In situations where the qualifications of an agency or individual are uncertain, it is required that burn boss duties are jointly administered under a unified command, with at least one of the burn bosses having NWCG burn boss qualifications.

3.10 Data Management

All fuels project information will be documented, maintained, and stored at the park level or a nationally approved data repository. This includes all plans, maps, and GIS data layers. Additionally, all fuels projects will have GIS polygons captured using current authoritative geospatial applications. The GIS data standard and reporting process is described in RM 18 Chapter 19, Information and Technology Management, Section 6.3.1, Wildland Fire Program Core Data. Chapter 19 also provides guidance on data stewardship, documentation, sharing, and archiving.

3.11 Wildland Fire Risk Assessments (Structures)

The wildfire risk assessment is a consistent method that has been applied to NPS units nationwide regardless of variations in climate, fuels, and topography. The goals for the assessment data collection are to:

- Create a complete inventory of facilities within NPS unit boundaries.
- Produce a rating for facilities within NPS unit boundaries that characterizes the facility's risk of ignition during a wildland fire.
- Facilitate fuel treatment planning and tracking, specifically with regard to the treatment of defensible space around NPS facilities and communities/developed areas.
- Optional: Quantify the effort (in person hours) required to defend facilities within an NPS unit in the event of a wildland fire by recommending tactics that could be implemented during an incident.

All structures at risk of loss or damage due to wildfire, or is designated for protection from wildfire, will receive a wildland fire risk assessment. Wildfire risk assessments are intended to be updated as conditions change over time and space. Structures that have received fuel treatments will be reassessed to determine the updated wildland fire risk. All wildfire risk assessments and updated wildfire risk assessments will be uploaded into the national wildland fire risk assessment database.

For prioritization of structures see section 3.12 below.

3.12 Fuels Treatment Prioritization Elements

At a minimum, the NPS meets the DOI established framework that documents how bureaus prioritize their annual fuels management workload in support of Interior Fire Executive Committee's vision to reduce wildfire risk and report on resulting annual accomplishments. Topics covered include:

- Fuels Program Objectives and Priorities
 - Integration with Resource Management
 - Stewardship-Based
 - Geographic Landscape-Based
 - Outcome Based
- Fuels Management Framework
 - Utilize Risk Assessment
 - Activities mitigate risk or reduce wildfire impact
 - Collaborate and leverage partner capabilities
- Accountability
- Fuels Management Program of Work Development and Accomplishment Reporting
- Fuels Treatment Effectiveness Monitoring (FTEM)
 - Bureau specific reporting requirements can be found on the FTEM page of the Interagency Fuel Treatment Decision Support System (IFTDSS) webpage; NPS FTEM Policy (2018), and the NPS Reporting Guidance (2020)
- Fiscal Accountability

(Additional guidance on fuels treatment prioritization can be found on the NPS Wildland Fire Management SharePoint Site)

NPS unit specific fuels treatment investment priorities should vary across the NPS due to site or regional specific challenges at the unit level, specific foundational values (including natural and cultural values) at and adjacent to the

unit, increase opportunity to manage wildfire for protection and resource objectives, ecological and societal vulnerabilities to wildfire, etc. NPS Structures across the NPS do provide an opportunity to systematically prioritize future treatments to reduce the risk of structure damage and/or loss due to wildfire. The NPS developed a model that derives a dynamic NPS-wide prioritized list of structures for consideration when developing fuel management programs of work that includes reducing wildfire risks to NPS structures. The model uses four components to develop a priority score: Treatability, Hazard, Importance, and Probability (tHIP).

- Treatability = Wildfire risk assessment Fuel loading score + Defensible space score/37
- Hazard = scaled hazard score assigned during the assessment = Score/131
- Importance = scaled park assigned API * replacement value = API/100 * CRV
- Probability = Burn probability
- tHIP = Treatability * Hazard * Importance * Probability

4 Non-Fire Treatments

Non-fire fuels treatments include the use of a variety of alternatives to prescribed fire for altering or modifying the composition or structure of wildland fuels and vegetation. These treatments may also be used in advance or during prescribed fire operations.

Non-fire treatments include any of the following activities/operations:

- Manual: Utilizing hand-operated tools or actions to thin or remove herbaceous and woody fuels and/or debris.
- Mechanical: Utilizing mechanized equipment or vehicles with attachments (i.e., mowers or masticator heads) to treat or manipulate fuels.
- Chemical: Utilizing the application of chemical agents to kill or restrict the growth of vegetation (this is a common treatment method used to reduce the distribution of non-native and invasive species).
- Biological: Utilizing living organisms to selectively suppress, inhibit, or remove herbaceous and woody vegetation. Examples may include livestock (cows, goats, or sheep) grazing or using insects to consume vegetation.

4.1 Non-Fire Treatment Planning and Documentation

All non-fire treatments must meet the FMP and NEPA requirements listed in Section 3, Program Requirements. This includes that all non-fire treatments be covered by the park's FMP, vetted through an interdisciplinary process, and approved by the park AA prior to implementation.

The following are recommendations for documenting non-fire treatments of varying complexity. The park AA will ultimately determine the level of documentation required. Non-fire fuel treatments such as constructing or improving fuel breaks along roads or park boundaries can utilize the description in the FMP, Vegetation Management Plan, or other park planning document as sufficient documentation. However, for any planned action(s), NEPA analysis (CE, EA, EIS) and site-specific compliance (Section 7, 106 and NHPA) are both required as described in Section 3.1.

Parks may also satisfy non-fire treatment documentation and NEPA requirements by entering the treatment in the [NPS Planning, Environment, and Public Comment \(PEPC\)](#) system. Information on treatment goals, objectives, and implementation standards or specifications should be described, and the Superintendent's approval provided under the appropriate NEPA pathway.

For more complex treatments covering large areas, or those requiring interagency coordination, the use of specialized or mechanized equipment, or contracted resources, a non-fire treatment plan is recommended and should include:

- **Goals and Objectives:** Identify treatment goals and list specific objectives in quantifiable and measurable terms.
- **Project Area:** Define or map the location(s) where the treatment(s) will be implemented.
- **Statement of Work:** Identify treatment methods, standards/specifications, and any additional treatment-specific considerations.
- **Protection of Sensitive Features:** Identify any mitigation actions needed to protect cultural sites, threatened and endangered species, and/or other sensitive features/concerns.
- **Public and Personnel Safety:** Address any unique or special safety concerns or issues related to treatment implementation and the required mitigation measures.
- **Monitoring:** Identify required monitoring methods and reporting frequency for assessing and evaluating treatment effectiveness (see RM 18 Chapter

- 8 Fire Ecology and Monitoring for guidance on monitoring non-fire treatments).
- Additional Sections may include but are not limited to:
 - Signature Cover Page: recommended
 - Interagency Coordination
 - Outreach and Notifications
 - Post-Treatment Reports: Identity files and reports that must be completed or maintained.

4.2 Non-Fire Treatment Operations

4.2.1 Treatment Methods

Specific non-fire fuels treatments include any vegetation manipulation and wildland fuels removal or modification undertaken to (1) reduce the likelihood of ignition, crowning potential, and fire intensity, (2) lessen potential damage and resistance to control, or (3) limit the spread and proliferation of non-native species and diseases. Vegetation and fuels management treatments must address locally unique fire and resource management issues as well as compliance concerns; therefore, these activities should always be coordinated with natural resource managers. The treatment methods include manual, mechanical, chemical, biological and any other form of vegetation manipulation other than prescribed fire. Methods may be stand-alone or used in any combination with or without prescribed fire.

4.2.2 Project Administration

The process by which work is accomplished is administered through the following categories:

Force Account: utilizing the in-house workforce (park, agency, or federal cooperator) under existing agreements and cost-sharing.

Contracting: utilizing outside (vendor, contract, inter-agency agreement (IAA), etc.) acquired personnel, equipment, and end-product specifications to achieve objectives (see Section 6, Contracting and Acquisitions).

Financial Assistance: Financial assistance programs are utilized to support fuels management projects through Cooperative/Task Agreements. For more information and resources, use the following link: [NPS Financial Assistance Policy - Home \(sharepoint.com\)](#)

4.3 Woody Biomass Utilization

Where ecologically appropriate and compliant with NEPA, project managers may choose to dispose of woody biomass through service contractors to reduce fuels by non-fire means and to preserve air quality.

- If the woody biomass is the by-product of a land management service contract issued after October 1, 2004, then the Option for Woody Biomass clause should be inserted in the contract (see section 5.8 for more specific guidance on the use of the Option for Woody Biomass Utilization in procurement contracts).
- If the woody biomass is the by-product of work done by a force account (NPS employees) or an existing service contract issued before October 1, 2004, and has fair market value, a separate timber/vegetative sales contract must be executed.

If the woody biomass is to be utilized in-park (for firewood, dust abatement, erosion control, etc.), then standard operating procedures for the park must be followed.

4.4 Fuel and Debris Disposal by Non-Fire Methods

The enabling legislation and regulations of each park may provide direction for the disposal or removal of living and dead vegetative material. The NPS is committed to preserving natural ecological processes. Organic resource material should be allowed to decompose on site whenever possible. However, when such material must be removed (for example, from a fuels treatment site) its market value must be considered. If the material is marketable, it must be sold as excess property, following normal disposal procedures. If it is found that the material is not marketable, it must be disposed of by Board of Survey action.

4.4.1 Standing Live Fuels

16 USC § 3 of the [Organic Act of 1916](#) provides some direction for standing live fuels:

“The Secretary of the Interior...may...upon terms and conditions to be fixed by him, sell or dispose of timber in those cases where in his judgment the cutting of such timber is required in order to control the attacks of insects or diseases or otherwise conserve the scenery or the natural or historic objects in any...park... The Secretary of Interior may sell and permit the removal of such

matured or dead or down timber as he may deem necessary or advisable for the protection or improvement of the park, and the proceeds derived there from shall be deposited and covered into the Treasury as miscellaneous receipts.”

4.4.2 Dead and Down Fuels

CFR Title 36 provides protection for Parks, Forests, and Public Property. The CFR has limited provisions for the use of dead and down fuels. For example: [Chapter 1, Part 2 Resource Protection, Public Use and Recreation](#)

§2.1 Preservation of natural, cultural, and archeological resources.

(a) Except as otherwise provided in this chapter, the following is prohibited:

(4) Using or possessing wood gathered from within the park area: Provided, however, that the AA may designate areas where dead wood may be collected for use as fuel for campfires within the park area.

It is up to each park Superintendent to promulgate regulations in the unit's compendium if wood sales will be permitted.

5 Prescribed Fire

5.1 NWCG Standards for Prescribed Fire Planning and Implementation

The NPS has adopted and will comply with requirements established in the [NWCG Standards for Prescribed Fire Planning and Implementation \(PMS-484\)](#) for planning, implementing, and evaluating all prescribed fires. To supplement the minimum requirements found in the guide, NPS prescribed fire programs will adhere to the following additional requirements:

- A delegation of authority may be provided to Burn Bosses at the discretion of the AA, or if required by non-NPS Burn Bosses.
- Resources listed as “contingency” must be available to respond to the incident within a specified time frame. If the contingency resources become unavailable to respond they must be replaced immediately, or the prescribed fire will be canceled as the burn is now out of prescription.
- Parks are required to notify the regional fire management office within 24 hours of any of the following events:
 - Any prescribed fire converted to a wildfire
 - Any prescribed fire requiring activation of the contingency plan specified in the burn plan

- Any prescribed fire that requires additional resources or operational time not accounted for in the incident action plan

Although not required, the following items are recommended:

- All prescribed fire projects should be coordinated in a collaborative process involving adjacent neighbors and local governments.
- An incident action plan (IAP) is recommended for large, multi-day, or high complexity prescribed fires. When utilized, the IAP will be prepared and approved for each operational period. It is permissible to develop a multi-shift IAP to cover a period of several days.
- A burn plan executive summary for high-complexity burns and omnibus plans. An informative summary is useful for the AA and reviewers of complex burn plans.
- Signatures of the resource manager, fire ecologist, and fire management officer as reviewers or for concurrence.
- Use of the optional Adequate Holding Worksheet in element 16 of prescribed fire plan elements or another rationale for determining holding resources.
- For element 20 (Monitoring) of the prescribed fire burn plan, direction is provided at the end of this section and in RM18, Chapter 8, Fire Ecology and Monitoring.

5.2 Burn Boss Type 3

The NWCG Standards for Prescribed Fire Planning and Implementation references Burn Boss Type 3 (RXB3) qualification position, however, RXB3 is not included in the NWCG Standards for Wildland Fire Position Qualifications PMS 310-1. RXB3 is included in the [Federal Wildland Fire Qualifications Supplement](#) to PMS 310-1 and endorsed by the NPS. RXB3 will only be allowed to conduct low-complexity prescribed fires where the final complexity is rated low.

5.3 Prescribed Fire Plans

The [NWCG Standards for Prescribed Fire Planning and Implementation \(PMS-484\)](#) lists the elements required for prescribed fire plans and describes content development for each element and the implementation policy. Prescribed fire plans must address all the elements identified.

5.4 Monitoring

To assess achievement of resource and fire management objectives, park units must monitor the effects of prescribed fire. Levels of prescribed fire monitoring include environmental conditions, fire observation, short-term change, and long-term change. For specific direction on requirements and recommendations for monitoring prescribed fire, see RM 18 Chapter 8, Fire Ecology and Monitoring.

5.5 Post-Burn Reporting

Managers may request a timely summary of information for a prescribed fire. Although complete information on fire effects is not immediately available, detailed information regarding fire observations, chronology of events, costs, and fire conditions should be summarized soon after the fire. This information can further be used in the adaptive management process to refine objectives, prescriptions, strategy, and tactics over both the short and long term. Post-burn reports should be completed within 10 days of the burn being declared out.

The burn boss should decide in advance who will prepare this report, and it should be filed as part of the permanent project record. A fire effects monitor (FEMO) can collect most of the recommended information, but final review and reporting responsibility resides with the burn boss. Post-burn reports should be stored in an individual project folder with the original burn plan and maintained in the park's files. Individual parks may require additional information. Currently there is no standardized format for post-burn reporting. In addition to PMS-484 Project File required elements, the following list contains items to consider when preparing this report.

Recommended Post-Burn Report Contents

- Fire Name
- Resources Numbers and Types (e.g., personnel and equipment)
- Burn Objectives
- Ignition Type and Pattern
- Holding Strategy
- Fuel Moisture Information (1-, 10-, 100-, and 1000-hour time lag, live woody and herbaceous, foliar)
- Drought Index Information
- Fire Behavior Indices Information (Burning Index, Energy Release Component)
- Precipitation Information
- Test Burn Description
- Chronology of Ignition
- Chronology of Fire Behavior

- Chronology of Significant Events
- Chronology of Smoke Movement and Dispersal
- Temperature (Range, Minimum, and Maximum)
- Relative Humidity (Range, Minimum, and Maximum)
- Accuracy of Spot Weather Forecast
- Initial Qualitative Assessment of Results (objectives achieved?)
- Future Monitoring Plan for Area (plots, photo points)
- Costs for All Phases (planning, preparation, implementation, and evaluation)
- Acres Burned
- Additional Comments

Attachments

- Map of Area Burned
- Unit Logs
- Copies of Accident/Injury Forms

5.6 Debris Disposal by Fire

Debris burning may be used as a method to dispose of vegetative material generated from maintenance activities (such as mowing or tree trimming), manual or mechanical hazardous fuels reduction, Wildland Urban Interface (WUI) fuels management projects, hazard tree removal, construction projects, or similar activities. Where permitted by local regulations, discarded building and administrative materials can also be burned. All debris disposal projects should be evaluated for alternatives to burning when possible, and desirable for of smoke management and safety concerns.

All debris disposal activities involving fire will be reviewed and approved by the AA (this authority may be delegated to the fire management officer) in consultation with the park fire management officer. In units without a fire management officer, the AA will consult with the park's cluster, area, or zone fire management officer. After consultation has occurred and it is determined that the debris disposal can be safely executed under the following conditions, the project may be implemented.

- The probability of burning into the wildland environment is mitigated. The burn is either conducted in (a) an incinerator-type device, (b) a non-wildland environment, or (c) a wildland environment where surrounding fuels are lacking, covered with snow, or wet from rainfall. Surrounding fuels must remain unavailable until the fire is declared out.
- Damage to surrounding natural or cultural resources is not expected.

- Once ignited, there is no present safety threat to on-scene personnel or the public.
- Curtailment is not expected for the duration of the disposal operation.
- Scope and complexity do not necessitate implementation by fire-qualified personnel.
- Follow-up monitoring is not required to evaluate environmental impacts.
- All state and local regulations can be met, including air quality regulations.

If any of these stipulations cannot be met, then the treatment constitutes a prescribed fire and must comply with all requirements for that type of activity.

The debris burn supervisor will ensure that a safety briefing is conducted and assigned personnel wear appropriate personal protective equipment (PPE). The safety briefing must identify the procedures to follow in the event of an injury or other emergency. The supervisor will notify appropriate agencies (i.e., as air quality officials, local fire departments, etc.) and neighbors. Debris disposal projects will be executed under the authority of all required permits. Someone must be assigned who has previously conducted similar debris disposal burns at the site or a similar site.

For all construction contracts or projects specifying fire as a potential disposal method for vegetative or woody debris, the fire management officer or local cooperating fire authority should review and approve contract stipulations related to debris burning. Costs associated with the debris burning must be included in the contract or project budget.

6 Contracting and Acquisitions

Contracting is a tool to provide the NPS with resources needed to accomplish fuels management activities and treatments. It may be in the form of a Contract, Purchase Order, Delivery/Task Order, Blanket Purchase Agreement (BPA), Inter/Interagency Agreement (IAA), etc. Contracting also provides an important source of work for local economies and communities where wildland fire is part of the landscape.

Only Contract Officers have delegated authority to enter, administer, or terminate contracts and make related determinations and findings. Contracting officers may only bind the Government to the extent of the authority delegated to them. Always consult with a Contract Specialist/Contracting Officer prior to beginning any work. For more information use the following link: [The Acquisition Navigator Toolkit \(ANT\) - Home \(sharepoint.com\)](#)

6.1 Guidance on Commercial Timber Disposal

The Office of Acquisition and Property Management and the DOI Office of the Solicitor have reviewed information and documentation regarding timber cutting in national parks. The 1916 Organic Act provides, at 16 USC § 3, that, with respect to NPS “parks, monuments and reservations,” the Secretary of the Interior may “dispose of timber” when, in the Secretary’s judgment, “the cutting of timber is required to control attacks of insects or diseases or otherwise conserve the scenery or natural or historic objects in any such park, monument or reservation.” Such actions are subject to any additional limitations found in individual park enabling legislation, the National Environmental Policy Act (NEPA) of 1969, the Endangered Species Act (ESA), and regulations governing federal actions affecting the environment (see, e.g., [40 CFR §1501: NEPA and Agency Planning](#) and [§1507: Agency Compliance](#); see also [50 CFR § 402](#) for information on consultation among federal agencies regarding the effect of actions on endangered or threatened species). Consult the park NEPA to ensure consideration of potential resource impacts in park proposals ([2015 NEPA Handbook \(nps.gov\)](#)).

The Organic Act has been used over the years, when consistent with sound environmental management, to allow land management treatments including thinning of hazardous fuel conditions.

Proceeds from timber sales will be sent to the Treasury. The only exception is when the Woody Biomass Utilization Clause is used for thinning, and the cost of the contract can be offset by the value of the biomass the contractor is allowed to purchase.

6.2 Woody Biomass Utilization Clause

In 2005, the Department of the Interior issued a final rule which includes an option for service contractors to remove woody biomass generated as a result of land management service contracts wherever ecologically appropriate and in accordance with the law.

- *Woody biomass* means the trees and woody plants, including limbs, tops, needles, leaves, and other woody parts, grown in a forest, woodland, or rangeland environment, that are the by-products of management, restoration, and/or hazardous fuel reduction treatment.
- *Ecologically appropriate* means those situations where the deciding officer (park Superintendent) determines it is not necessary to retain specific woody material and/or reserve specific areas from woody biomass removal to meet ecological objectives. For example, it would not be

- ecologically appropriate to allow the removal of the specified woody biomass if snags or coarse woody debris are necessary to meet wildlife habitat objectives or to create specific prescribed fire burning conditions to stimulate native plant development.
- *Woody biomass utilization* or *use* means the harvest, sale, offer, trade, and/or utilization of woody biomass to produce the full range of wood products, including timber, engineered lumber, paper and pulp, furniture and value-added commodities, and bioenergy and/or bio-based products such as plastics, ethanol, and diesel.

Where ecologically appropriate and compliant with NEPA, project managers may choose to dispose of woody biomass through service contractors to reduce fuels by non-fire means and to preserve air quality.

Land management service contracts issued after October 1, 2004, must include an option for the contractor to remove woody biomass wherever ecologically appropriate (as determined by the park superintendent) and in accordance with the law (48 CFR § 1452). The biomass must be generated during land management service contract activity, and the contractor must comply with the terms, conditions, and special provisions of the contract. The contracting officer must insert the clause for each solicitation and contract found in [48 CFR § 1452.237-71 Utilization of Woody Biomass](#).

The sales contract and service contract are severable; default or termination under either contract does not remove the contractor from payment or performance obligations under the other contract.