

# **Appendix C. Fire Approvals**



# United States Department of the Interior



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Instruction Memorandum No. ID-2012-052  
Expires: 09/30/2013

To: Boise and Twin Falls District Managers

From: State Director

Subject: Interim Guidance for Fire Management in Owyhee Canyonlands Wilderness

**Program Area:** Fire Management

**Purpose:** This Instruction Memorandum (IM) provides interim guidance for fire management in Wilderness areas and Wild and Scenic River (WSR) corridors designated by the Omnibus Public Land Management Act (OPLMA) of 2009 (P.L. 111-11). This guidance outlines the authority and approval process for fire suppression activities that utilize motorized equipment and mechanical transport within the Owyhee Canyonlands Wilderness until the Bureau of Land Management (BLM) completes a Wilderness Management Plan. The Owyhee Canyonlands Wilderness consists of the Bruneau-Jarbidge Rivers, Big Jacks Creek, Little Jacks Creek, Pole Creek, Owyhee River, and North Fork Owyhee River Wilderness areas.

**Policy/Action:** The OPLMA of March 30, 2009 designated approximately 517,000 acres of Wilderness and 318 miles of WSR in Southwest Idaho. Many of these areas were previously managed as Wilderness Study Areas (WSA) or rivers and streams suitable for Wild, Scenic or Recreational designation. Section 1503 (b)(9) of the OPLMA states, “[c]onsistent with section 4(d)(1) of the Wilderness Act (16 U.S.C. 1133(d)(1)), the Secretary may take any measures that the Secretary determines to be necessary to control fire, insects, and diseases, including, as the Secretary determines appropriate, the coordination of those activities with a State or local agency.”

Fire suppression and suppression rehabilitation activities will follow BLM Manual 6340 - Management of Designated Wilderness Areas, 43 CFR Part 6300, current National Interagency Standards for Fire and Fire Aviation Operations (Red Book), the Wilderness Act of 1964, current Fire Management Plans, and current Land Use Plans. Managing fires for multiple objectives will

be addressed in the Wilderness Management Plan if not already included in current Land Use Plans. Fire suppression activities within designated Wilderness should always utilize Minimum Impact Suppression Tactics (Incident Response Pocket Guide 2010; NFES #1077) while providing for the protection and safety of firefighters and the public.

**Wildland Fire Operations**

The following table lists the authorized officials designated to approve the use of motorized equipment, mechanical transport, and other suppression related activities that are normally “Prohibited Uses” in Wilderness areas (CFR 6302.20). All emergency actions should be determined utilizing the minimum tool, equipment, or structure necessary to successfully, safely, and economically accomplish the objective. Pursuant to Section 4(c) of the Wilderness Act, otherwise prohibited uses may be authorized in Wilderness areas only when they are determined to be “...necessary to meet minimum requirements for the administration of the area for the purpose of this Act...” Thus, managers should avoid selecting an alternative based primarily on costs and the amount of time needed for implementation. While administrative activities should always be accomplished with economic efficiency, both the Wilderness Act and the agency’s wilderness policy direct us away from using either the cost or the time required for implementation as over-riding considerations when evaluating the potential use of otherwise prohibited activities.

Equipment/Transport Request	Approving Official
Helicopter Bucket Work, Dip sites, and Water Delivery	Field Office Manager
Motorized Water Pumps	
Aerial Retardant Application	
Air Transport/Personnel Shuttle (landings) and Supply Drops	
Chainsaws	
Motor Vehicles <ul style="list-style-type: none"> <li>• Engines</li> <li>• Transports</li> <li>• Crew Trucks</li> <li>• UTV/ATV</li> </ul>	District Manager
Helispot Construction (major ground disturbance)	
<b>Heavy Equipment</b>	<b>State Director</b>

**Authorities:**

**The Wilderness Act of 1964 (16 U.S.C. § 1131-1136), as amended.**

**BLM Manual 6340 – Management of Designated Wilderness.****Omnibus Public Land Management Act of 2009 [Section 1503(b)(9)].**

Pre-season meetings should be conducted to clarify the approval process outlined in this IM and address pertinent issues regarding fire operations in Wilderness areas. A post-incident and/or post-season after action review is also recommended to evaluate lessons learned.

The chosen tool, equipment, or structure should be the one that least degrades wilderness values temporarily or permanently. Attachment 1 to this IM provides the request and approval process, which consists of two forms:

- *Form I. Specific Request for Use of Motorized Equipment or Mechanical Transport*
- *Form II. Decision Rationale and Project Authorization*

It is the responsibility of the Approving Official to gain the necessary assistance from the District's Fire Management Staff and a Resource Advisor (READ)/Technical Specialist (THSP) to complete the forms. A rationale will be provided as to why the use of motorized equipment or mechanical transport is necessary, and why the request was approved or denied. This documentation and rationale will be the Record of Approval. In the interest of time, the authorized officer may provide initial verbal approval as long as all supporting documentation and rationale is provided in the Record of Approval within 48 hours. Consultation with a READ/THSP will be conducted for any ground-disturbing activity and/or the use of a water dip site within a Wilderness area or Wild and Scenic River corridor.

State Director (or Acting) approval will be required when major ground-disturbing actions (i.e. line construction using heavy equipment) are deemed to be the minimum tool necessary. This approval will include a clear rationale of why the action is necessary. If the State Director's initial approval is verbal, all supporting documentation and rationale will be submitted for the State Director's signature within 48 hours.

If dozer line is being constructed adjacent to Wilderness, a mechanism needs to be in place to ensure line construction does not encroach on the Wilderness. This may be accomplished with a mobile or handheld Global Positioning System device, a set of maps with Wilderness boundary layers, and/or prior consultation with a resource advisor.

All appropriate documentation and rationale should be filed with the official Wilderness monitoring records. Additionally, copies of this documentation and rationale should be filed with the official fire incident report and the Wildland Fire Decision Support System if a published decision is required.

**Timeframe:** Guidance is effective immediately.

**Background:** The first BLM – administered Wilderness areas in Idaho were designated by the OPLMA of 2009 (P.L. 111-11). Currently there are no adopted guidelines for fire suppression within the Owyhee Canyonlands Wilderness areas. Until a Wilderness Management Plan is developed that identifies wildfire management guidelines for these areas, fire suppression and suppression rehabilitation activities will follow BLM Manual 6340 - Management of Designated Wilderness Areas, 43 CFR Part 6300, current National Interagency Standards for Fire and Fire Aviation Operations (Red Book), the Wilderness Act of 1964, current Fire Management Plans, and current Land Use Plans. This IM and attached Record of Approval provide guidance for documenting the minimum requirements analysis for the administration of fire suppression activities within Wilderness.

**Manual/Handbook Sections Affected:** None.

**Coordination:** Boise and Twin Falls District Fire & Aviation and Management; Owyhee Wilderness Project Lead; Idaho State Wilderness Lead; Idaho State Fire Management Specialist

**Contact:** For questions regarding this action/guidance, contact John Sullivan, Wilderness Project Leader, Boise District Office, at (208) 384-3338.

**Boise District with Union:** Management is reminded to notify and satisfy any bargaining requirements prior to implementation

Signed by:  
Steven A. Ellis

Authenticated by:  
Susanna M. Henry  
Fire Program Assistant (ID-916)

1 Attachment:

1 – Record of Approval for Motorized Equipment or Mechanical Transport in Wilderness (5 pp)

## Record of Approval For Motorized Equipment or Mechanical Transport in Wilderness

### Introduction

The following forms will be used to document approval for utilizing motorized equipment or mechanical transport for fire suppression activities in Wilderness. They are intended to assist the Approving Official (Table 1) with the decision process. The Approving Official may choose to consult a Resource Advisor (READ)/Technical Specialist (THSP) and Fire Management Staff to compare the motorized/mechanized action(s) to its alternative (non-motorized/non-mechanized) to ensure consideration of only the minimum required tools.

### Authority in Emergency

Table 1 lists the authorized officials who can approve the use of motorized equipment, mechanical transport, and other suppression related activities that are normally “Prohibited Uses” in designated Wilderness Areas. In the interest of time, the authorized officer may provide initial verbal approval as long as all supporting documentation and rationale is provided in the Record of Approval within 48 hours.

<b>Table #1: Delegation Level of Authority</b>	
Equipment/Transport Request	Approving Official
Helicopter Bucket Work, Dip sites, and Water Delivery	Field Office Manager
Motorized Water Pumps	
Aerial Retardant Application	
Air Transport/Personnel Shuttle (landings) and Supply Drops	
Chainsaws	
Motor Vehicles <ul style="list-style-type: none"> <li>• Engines</li> <li>• Transports</li> <li>• Crew Trucks</li> <li>• UTV/ATV</li> </ul>	District Manager
Helispot Construction (major ground disturbance)	
<b>Heavy Equipment</b>	<b>State Director</b>

### Authorities:

**The Wilderness Act of 1964 (16 U.S.C. § 1131-1136), as amended.**

**BLM Manual 6340 – Management of Designated Wilderness.**

**Omnibus Public Land Management Act of 2009 [Section 1503(b)(9)].**

### **Evaluating Alternatives**

A rationale for the use of any motorized/mechanized action must be prepared to identify and evaluate the potential impact to wilderness characteristics. The action and its potential impact to wilderness characteristics (Table 2) must be evaluated in comparison with a non-motorized/non-mechanized alternative. Table 2 is included as a reference when considering suppression actions within Wilderness, especially those actions that are normally prohibited. Consider any of the following questions that may be applicable when completing the rationale:

- Why is the use of motorized or mechanized equipment in Wilderness the minimum tool required to achieve fire management objectives?
- What are the circumstances that prompt the need to consider using motorized or mechanized equipment in Wilderness?
  - Define potential threats to life, property, or resources (including threatened, endangered, and sensitive species habitat).
  - Is action necessary to meet the requirements of other laws? Laws that do not directly address Wilderness (such as the Endangered Species Act or National Historic Preservation Act) may influence the need for actions in Wilderness.
  - Is it feasible to utilize existing routes as firelines in or outside of Wilderness?
- How will the Wilderness resource be protected?
  - Is action necessary to preserve any of the qualities of Wilderness character? Taking action in Wilderness may be necessary to preserve one or more of the qualities of Wilderness character, or the public purposes associated with them.

### **Project Authorization**

The Approving Official will use Forms I and II to document details about the request and provide a rationale for utilizing motorized/mechanized equipment in Wilderness. Form I is used to document the details of the fire situation and the equipment/transport requested, identify the specific use or objective, and provide the time period and location for tactic implementation. Form II will be used to provide the rationale for approval/denial and any expected impacts to the Wilderness. The location and time period will facilitate the inventory of potential impacts for rehabilitation efforts. These processes will not only help document decisions made in Wilderness, they will also be included in the monitoring record that is required every 5 years.

**Form I. Specific Request for Use of Motorized Equipment or Mechanical Transport****FIRE ORIGIN:**

Fire Name/Number:		Start Date/Time:	
Wilderness Area(s):		General Location:	Lat./UTM:
			Long./UTM:

**CURRENT SITUATION:**

Date/Time:		Current Size:	
Authorization Requested by:		Resource Advisor	

**SPECIFIC REQUEST:**

Motorized Equipment/Mechanical Transport	Equip. Request (Check)	Specific Use or Objective (Check blank or provide specific information)	Authorized Time Period and Specific Area of Fire
<b>Helicopter</b>		Landing for __ Initial attack; __ Extended attack	
		Bucket Drops to support ____ Initial attack, ____ Extended attack Approved water source(s)/dip site(s): <hr/> Water sources to avoid: <hr/>	
<b>Portable Pump</b>		Support to: __ Initial attack; __ Extended attack, and/or __ Mop Up. Approved water source(s): <hr/> Water sources to avoid: <hr/>	
<b>Aerial Retardant Application</b>		Support to: __ Initial attack; __ Extended attack.	
<b>Chainsaw</b>		Fell Trees/snags posing a threat to the integrity of the fireline.	
		Fell Trees/snags posing a threat to firefighter safety.	
		Clearing fireline of brush/limbs to control spread.	
		Bucking logs posing threat to integrity of fireline.	
<b>Motor Vehicles (Engines Transports Crew Trucks UTV/ATV )</b>		Support to: __ Initial attack; __ Extended attack, and/or __ Mop Up. Engine (Qty. and Type) <hr/> Transport (Qty.) <hr/> Crew Truck (Qty.) <hr/> UTV (Qty.)                      ATV (Qty.)	
<b>Helispot Construction</b>		Major ground disturbance in support of multi-day: __ crew delivery; __ supply/equip. delivery	
<b>Heavy Equipment</b>			
<b>Other</b>			

## Form II. Decision Rationale and Project Authorization

<b>Decision Rationale for Approval of Motorized Equipment or Mechanical Transport in Wilderness</b> <i>Note - Identify why the action was approved or not approved. Identify why this action is the minimum necessary requirement. Describe effects to wilderness characteristics. Note any changes to the determination of impacts from Table #1.</i>
<b>Helicopter Bucket Work (Identify if dip sites are included in approval)</b> This action (s) is Approved/Not Approved for the following reasons:
<b>Portable Pump</b> This action is Approved/Not Approved for the following reasons:
<b>Aerial Retardant Application</b> This action is Approved/Not Approved for the following reasons:
<b>Helicopter Landings</b> This action is Approved/Not Approved for the following reasons:
<b>Chainsaw</b> This action is Approved/Not Approved for the following reasons:
<b>Motor Vehicles (Engines, Transports, Crew Trucks, UTV/ATV)</b> This action is Approved/Not Approved for the following reasons (Specify Type of Motor Vehicle(s)):
<b>Helispot Construction (major ground disturbance)</b> This action is Approved/Not Approved for the following reasons:
<b>Heavy Equipment</b> This action is Approved/Not Approved for the following reasons:
<b>Other (Specify):</b> This action is Approved/Not Approved for the following reasons:

**Authorized By:**

**Title:**

**Date:**

**Approving Official**

<b>Table #2. Reference for Evaluating Suppression Actions in Wilderness</b>	
<b>Motorized Action</b>	<b>Non-motorized Alternative</b>
<b>Motorized Equipment/Mechanical Transport</b> <i>Note: Pre-season determination of impacts are listed below each action and defined below*</i>	<b>Non-Motorized Equipment/Non-mechanized Transport</b>
<b>Helicopter dip sites</b>  Temporal = T Wilderness Characteristics = UD, SPU, N	Utilize natural water sources outside of Wilderness. Consider utilizing portable water tanks located outside Wilderness.
<b>Helicopter water drops</b>  Temporal = T Wilderness Characteristics = UD, SPU, N	Use backpack pumps, gravity fed hose lays, or dry mop
<b>Helicopter sling loads</b>  Temporal = T Wilderness Characteristics = UD, SPU	Pack or float materials in or out
<b>Para-cargo drops</b>  Temporal = T Wilderness Characteristics = UD, SPU	Pack or float materials in or out
<b>Helicopter landings</b> (each considered separately) Temporal = T Wilderness Characteristics = UD, SPU	Personnel and materials are packed or floated in or out
<b>Motorized Water pumps</b>  Temporal = T Wilderness Characteristics = UT, UD, SPU	Use backpack pumps, gravity fed hose lays, dry mop
<b>Aerial retardant application</b>  Temporal = T/ST Wilderness Characteristics = UT, UD, N, SPU, UAOF	Manage fire using natural features and fuel breaks. Consider utilizing water in place of chemical retardant.
<b>Chainsaws</b>  Temporal = T/ST/LT Wilderness Characteristics = UT, UD, N, SPU	Use cross-cut saws, locate line to avoid or minimize need for cutting, avoid or isolate hazard trees
<b>Motor Vehicles</b> (Engines, Transports, Crew Trucks, UTV/ATV) Temporal = T/ST Wilderness Characteristics = UT, UD, SPU	Manage fire using natural features, fuel breaks, and burnout. Utilize aerial reconnaissance.
<b>Helispot construction (major ground disturbance)</b> (each considered separately) Temporal = T/ST/LT Wilderness Characteristics = UT, UD, SPU, UAOF	Use natural openings
<b>Heavy Equipment</b>  Temporal = T/ST/LT Wilderness Characteristics = UT, UD, N, SPU, UAOF	Manage fire using natural features, fuel breaks, and burnout
<b>Other:</b>  Temporal = Wilderness Characteristics =	
*The following <b>codes</b> are used to list each impact to wilderness characteristics: UT=Untrammeled; UD=Undeveloped; N=Natural; SPU=Outstanding Opportunities for Solitude or Primitive and Unconfined Recreation; UAOF=Unique Attributes or Other Features; <b>Temporal Scale of impact:</b> T=Temporary (<1 year), ST=Short-Term (1-3 years), LT=Long-Term (>3 years).	