



Forest
Service

Washington
Office

1400 Independence Avenue, SW
Washington, DC 20250

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Subject: Wildland Fire Suppression Policy for Structure Protection

To: Regional Foresters

As we approach a new fire season it is important to be clear about our policy regarding structure protection, while responding to wildland fires. Issues surrounding structure protection continue to arise in Office of Inspector General/Government Accountability Office audits, accident board of review recommendations, large fire cost reviews, and other internal reviews. Although the policy is sound, varying interpretations have led to confusion in application.

The goal of the enclosed document is to achieve consistent implementation of structure protection principles throughout the agency.

In reviewing this document I ask you to consider the potential impact this direction could have on agreements with your cooperators. As such, discussions and revisions to these agreements may be required to fully implement this direction. We are not changing our policy, but instead clarifying direction about the Forest Service role in structure protection on state and private lands and for Forest Service owned facilities.

I support this approach as implementation of these principles will lead to efficient and safe execution of our role in structure protection.

/s/ Abigail R. Kimbell
ABIGAIL R. KIMBELL
Chief

Enclosure

cc: Tom Harbour



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Forest Service Structure Exposure Protection Principles

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Mission and Role

A significant role of the Forest Service is to manage natural resources on public land, and management of unwanted wildland fire is a primary mission in that role. Wildland firefighter training, tools, and personal protective equipment are based on the wildland environment. This does not prevent using wildland tactics in the Wildland Urban Interface (WUI) when risks are mitigated. Wildland firefighter training for the WUI, however, is centered on the concepts of preventing wildland fire from reaching areas of structures and/or reducing the intensity of fire that does reach structures. Fire suppression actions on structures that are outside federal jurisdiction, outside the scope of wildland firefighting training, or beyond the capability of wildland firefighting resources are not appropriate roles for the Forest Service.

Forest Service leadership will express clear and concise “leader’s intent” to ensure structure protection assignments are managed safely, effectively, and efficiently. Leaders are expected to operate under existing policies and doctrine under normal conditions. Where conflicts occur, employees will be expected to weigh the risk versus gain, and operate within the intent of Agency policy and doctrine.

Strategic Principles

1. The Forest Service actively supports creation of Firewise Communities and structures that can survive wildland fire without intervention. We support the concept that property owners have primary responsibility for reducing wildfire risks to their lands and assets.
2. The Forest Service will actively work toward applying Firewise concepts to all Forest Service owned structures, facilities, and permitted use to serve as a model to publics and communities.
3. The Forest Service will apply strategy and tactics to keep wildland fires from reaching structures, as prudent to do so, considering risk management for firefighters and publics, fire behavior, values at risk including natural resources, availability of firefighting resources, and jurisdictional authorities.
4. The Forest Service will be proactive in developing agreements with interagency partners to clarify its structure protection policy.
5. The Forest Service structure protection role is based on the assumption that other Departments and agencies will fulfill their primary roles and responsibilities. The Forest Service will not usurp individual, local, or state responsibility for structure protection.
6. Prior to task implementation, a specific structure protection role briefing will be accomplished.

Tactical Applications

Structure Protection Definition

Actions taken in advance of a fire reaching structures or other improvements are intended to safely prevent the fire from damaging or destroying these values at risk. For the Forest Service, structure protection involves the use of standard wildland fire suppression tactics and control methods; including the use of standard equipment, fire control lines, and the extinguishing of spot fires near or on the structure when safe and practical.

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USFS Role

As documented in a Forest Service doctrinal principle, “Agency employees respond when they come across situations where human life is immediately at risk or there is a clear emergency, and they are capable of assisting without undue risk to themselves or others.” This principle serves as a foundational basis for the roles employees play in structure protection.

Pursuant to this “structure protection” policy provided above, Forest Service personnel may engage support from other cooperators in structure protection activities when 1) requested by local government under terms of an approved cooperative agreement or 2) when operating within a unified command. The agency is permitted, without agreement, to render emergency assistance to a local government in suppressing wildland fires, and in preserving life and property from the threat of fire, when properly trained and equipped agency resources are the closest to the need, and there is adequate leadership to do so safely. The agency will NOT routinely provide primary emergency response (medical aids, fire suppression, HAZMAT, etc... as identified on “run cards” or preplanned dispatch scenarios) nor will the agency supplant the local government responsibility to do so.

The contents of a cooperative agreement will clearly define the responsibilities of partners. Regarding structural fire protection, typical Forest Service responsibilities in the case of mutual aid, initial attack, extended attack, or large fire support include:

- a) To provide initial attack through extended attack actions consistent with application of wildland fire strategy and tactics.
- b) To supply water in support of tribal, state or local agencies having jurisdictional responsibility for the fire. This would include the use of water tenders, portable pumps, hose, tanks, and supporting draft sites.
- c) To assist or supply foam or chemical suppressant capability with engines or aerial application.
- d) To assist local authorities in the event of evacuations.
- e) To assist local authorities by assessing (triaging) structures for defensibility from wildfire.
- f) To coordinate with local authorities on actions taken by Private Structure Protection Companies.

As such, there should not be an expectation that the Forest Service will:

- “Wrap” or set up and administer sprinklers around privately owned structures
- Remove fuels immediately surrounding a structure such as brush, landscaping or firewood.

As addressed above, the Forest Service will apply strategy and tactics to keep wildland fires from reaching structures, as prudent to do so, considering risk management for firefighters and publics, fire behavior, values at risk including natural resources, availability of firefighting resources, and jurisdictional authorities.

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The Forest Service shall not:

- Take direct suppression actions on structures other than those that tactically reduce the threat of fire spread to them.
- Enter structures or work on roofs of structures for the purpose of direct suppression actions.

In consideration of Forest Service owned or leased structures outside of structure fire protection areas these same policies apply. The use of Firewise principles and aggressive fire prevention measures will be employed for Forest Service structures at every opportunity.

If a Forest Service structure is determined to be at risk, “wrapping” or other indirect protection methods for the structure can be authorized by the Agency Administrator. Documentation of these decisions needs to be placed in the fire documentation package and the unit files. Any employee engaged in “wrapping” or other indirect methods of protection operations will be thoroughly briefed and trained in correct safety and personal protection equipment procedures, especially if the use of ladders or climbing on the structure is necessary. In any case, the Forest Service holds that no structure is worth the risk of serious injury to an employee in an attempt to protect that structure or facility from fire.

Local Government Role

Local government has the responsibility for emergency response, including structure protection, within their jurisdiction. This responsibility is usually found within the fire agencies’ charter and is substantiated by tax dollar revenue (sales and/or property tax).

Cost

Local governments assume the financial responsibility for emergency response activities, including structure protection, within their jurisdictions. Local government will order resources deemed necessary to protect structures within their jurisdiction. Local agencies will not be reimbursed for performing their responsibilities within their jurisdiction.

Tactical Operating Principles

When engaging in structure protection activities, as defined above, Forest Service personnel will apply the following principles:

- The first priority for all risk-decisions is human survival, both of firefighters and the public.
- Incident containment strategies specifically address and integrate protection of defensible improved property and wildland values.
- Direct protection of improved property is undertaken when it is safe to do so, when there are sufficient time and appropriate resources available, and when the action directly contributes to achieving overall incident objectives.

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- Firefighter decision to accept direction to engage in structure protection actions is based on the determination that the property is defensible and the risk to firefighters can be safely mitigated under the current or potential fire conditions.
- A decision to delay or withdraw from structure protection operations is the appropriate course of action when made in consideration of firefighter safety, current or potential fire behavior, or defensibility of the structure or groups of structures.
- Firefighters at all levels are responsible to make risk-decisions appropriate to their individual knowledge, experience, training, and situational awareness.
- Every firefighter is responsible to be aware of the factors that affect their judgment and the decision-making process, including: a realistic perception of their own knowledge, skills, and abilities, the presence of life threat or structures, fire behavior, availability of resources, social / political pressures, mission focus, and personal distractions such as home, work, health, and fatigue.
- An individual's ability to assimilate all available factors affecting situational awareness is limited in a dynamic wildland urban interface fire environment. Every firefighter is responsible to understand and recognize these limitations, and to apply experience, training and personal judgment to observe, orient, decide, and act in preparation for the "worst case".
- It is the responsibility of every firefighter to participate in the flow of information with supervisors, subordinates, and peers. Clear and concise communication is essential to overcome limitations in situational awareness.