

Thirtymile Hazard Abatement Implementation Frequently asked Questions & Answers

Q-1: Does the Thirtymile Hazard Abatement Plan (HAP) apply only to Region 6, or to all FS regions, and/or to other agencies?

A-1: The R6 Regional Forester submitted the final HAP to the OSHA on March 16, 2002. The Chief “nationalized” the scope of the HAP, making it applicable on all National Forest System lands in his policy letter of April 16, 2002. Thus, the HAP applies to every National Forest. All mitigation measures must be in place and implemented on every wildland fire on National Forest jurisdiction and for every firefighter assigned to a FS fire, regardless of their agency affiliation. The HAP is Forest Service (FS) specific, and does not apply to fires on cooperating agency’s jurisdictions. However, other agencies are implementing some hazard abatement actions on their own.

Q-2: When will the Thirtymile OSHA HAP actions expire or no longer require compliance?

A-2: Never. They will continue to apply into the future unless superseded by a policy revision from the Chief.

Q-3: Since last July, there has been an overwhelming amount of information, talking points and direction sent to the field. Which are the most important and which ones should I follow?

A-3: The Forest Service website www.fs.fed.us/fire/fire_new/ provides an excellent source of information regarding the Thirty-Mile Incident. For implementation and monitoring purposes there are four key documents that all FS units must follow:

- January 11, 2002 letter or direction from the FS Chief.
- The Thirty-Mile Accident Prevention Plan, as updated.
- The OSHA Hazard Abatement Plan, of March 26, 2002.
- April 16, 2002 letter of direction from the FS Chief.

Q-4: Do the actions listed in the HAP apply to Forest Service employees when engaged in wildland fire activity on non-Forest Service units?

A-4: Since employees do not lose their status as “Forest Service Employees” when they are working on non-Forest Service fires, the HAP still applies to every Forest Service employee when engaged in wildland fire activities, even on non-Forest Service incidents. Examples of applicable abatement actions are:

- Compliance with the work/rest guidelines.
- Compliance with the Ten Standard Firefighting Orders
- Mitigation of the Watch Out Situations
- Only working in positions qualified for unless formally assigned as a trainee.

- Looking for (inspecting) safety and health hazards and working with incident management personnel to resolve them.

However, cooperating agencies are not required to monitor and document actions taken in compliance with the Hazard Abatement Plan, or provide products such as fire danger pocket cards. Information contained on pocket cards can be obtained from incident briefings. (See Question # 16)

Q-5: When the employees of other agencies work on Forest Service fires, do HAP actions and recent policy changes apply?

A-5: If non-FS employees are assigned to a FS fire via a FS originated Resource Order, the HAP actions and FS policy apply unless these actions would violate their home agency contracts, union agreements, or applicable interagency Fire Protection Agreements, Operating Plans, or Mutual Aid Agreements. These employees are “agents” of the host FS Agency Administrator, and must comply with the FS policies while assigned to the FS fire.

Q-6: Do the above actions and policies apply if employees from a cooperating agency are working on an FS fire as an “independent action” of their home agency to protect resources at risk on lands within their jurisdictional responsibilities?

A-6: No. In this situation, they are not agents of the FS, thus neither FS policy nor the hazard abatement actions apply.

Q-7. Who does the Code of Conduct for Fire Suppression apply to and when?

A-7. The following Code of Conduct for Fire Suppression (April 16, 2002 letter of direction) applies to every Forest Service employee, regardless of the jurisdiction of the wildland fire incident.

Code of Conduct for Fire Suppression:

- Firefighter safety comes first on every fire every time.
- The 10 Standard Firefighting Orders are firm...we don't break them; we don't bend them.
- All 18 Watch Out Situations must be mitigated before engagement or re-engagement of suppression activities.
- Every firefighter has the right to know that his or her assignments are safe.
- Every fireline supervisor, every fire manager, and every administrator has the responsibility to confirm that safe practices are known and observed.

Q-8. When does time begin for work/rest purposes?

A-8. When work started following the last “rest” period. The policy states: “Provide the opportunity for a minimum of 1-hour of rest for every 2-hours of work or travel

regardless of work performed (incident/non-incident), incident type or jurisdiction, time of incident or operational period, or regular work schedule.”

Q-9. When is the first operational period and how is it defined?

A-9. It is defined in the Thirtymile Hazard Abatement Plan as 16 hours from the initial action taken on a fire.

Q-10. What standards are there for documentation of approved exceptions to work rest guidelines?

A-10. There are no established documentation standards. The requirement is for “documentation” to be included in the daily incident package. The April 16 Chief’s letter suggests “The Daily Shift Log” as an “acceptable” method of documentation. Common sense would tell us that we need to answer the: who, what, why, where, and how questions. Remember that the only approved exception to work/rest guidelines is for situations where there is an imminent threat to human life.

Q-11: How is the definition of first operational period of 16 hours after initial action different from years past.

A-11: For the purposes of compliance of the OSHA Hazard Abatement Plan, if a wildland fire is still requiring suppression action after 16 hours from the time initial action started, the Incident Commander is now required to monitor and document three specific items regarding work/rest guidelines.

- Description of actions taken to monitor work/rest cycles.
- The rationale for every incidence where work/rest limitations guidelines were exceeded.
- Action(s) taken to assure future compliance.

Q-12: When is it appropriate to exceed work/rest guidelines?

A-12. Exceptions to the work/rest policy should only occur when there is an imminent threat to human life, and the exception has been pre-approved by the Incident Commander or Agency Administrator.

Q-13: Since the OSHA Abatement Plan specifies that the first operational period is 16 hours after initial action, does this mean I must stop working after 16 hours?

A-13: No, personnel may continue working past 16 hours if approved by the Incident Commander. Any work beyond 24 hours must be pre-approved by the Incident Commander or Agency Administrator for situations where there is an imminent threat to human life. Once the work period is complete and personnel are off the clock, for every 2 hours worked (including any non-fire suppression work), personnel must have 1 hour of uninterrupted rest.

Q-14: If I am an Incident Commander on another agency's wildland fire, am I required to document information regarding work-rest guidelines?

A-14: No documentation is required related to the HAP unless on a FS wildland fire. However, documentation may be required by the host agency or in response to guidance in the Interagency Incident Business Management Handbook.

Q-15: What applies on a multi-jurisdictional fire that is only partially on a national forest?

A-15: All FS employees and any non-FS resource on a FS specific Resource Order must comply with the actions in the Hazard Abatement Plan.

Q-16: Action item 3-b in the Prevention Action Plan requires fire danger pocket cards be issued to every fireline supervisor. What happens when I go to another National Forest or another jurisdiction, how do I get a pocket card?

A-16: Pocket cards are required for all fireline supervisors and the home unit is responsible for providing the pocket cards to all home unit fire line supervisors and all assisting off-unit fire line supervisors, regardless of the agency affiliation. For Forest Service people who assist another Forest Service unit, that unit has the responsibility to provide pocket cards. For Forest Service people who assist non-Forest Service units, there is no requirement for pocket cards. Forest Service people may request a pocket card, or the information contained on the pocket card when assisting a non-Forest Service unit.

Q-17. The recently released Entrapment Avoidance training CD contains information on "disengagement". Is this information policy?

A-17. No. The only policy on this subject is contained in the April 16, 2002 letter of direction from the FS Chief, which states: "ICs shall monitor the effectiveness of planned strategies and tactics, and disengage when they cannot be implemented safely. Aggressive fire suppression activities may be reinitiated as soon as strategies and tactics are adjusted to ensure actions will be in full compliance of the Ten Standard Fire Orders and all of the Eighteen Watch Out Situations have been mitigated.

Q-18. Do I need to consider all non-FS resources on Type 3, 4, and 5 fires as "out-of-forest" and provide them with an "after action report" (evaluation)?

A-18. The intent of this HAP action is to provide evaluations, which include compliance with the 10 Standard Fire Orders and 18 Situations That Shout Watch Out, to crews responding to FS incidents except for those from the host Forest and local resources from cooperating agencies who routinely respond to these fires under a preplanned dispatch system. All other resources would be considered "out-of-forest".

Q-19. Are we (FS) responsible to provide an Incident Response Pocket Guide to all cooperating agency personnel coming onto our incidents?

A-19. FS policy states that all fireline supervisors will be issued an Incident Response Pocket Guide. If the employee does not have one, the FS should provide a copy to cooperating agency's personnel who are functioning as fireline supervisors.

Q-20. How do I know which checklist, size up report, risk management process, complexity analysis, or transition guidance to use? This information is similar but different in the Incident Response Pocket Guide, the Fireline Handbook, Standards for Fire and Aviation Operations -2002, and my Unit's Fire Management Plan. Which should I use?

A-20. The incident management tools and aids in all of these documents are all acceptable for use. There is no requirement to use one aid over another. You should use the tool that best fits your fire situation and complexity. Future standardization of these aids may occur on an interagency basis.

Q-21. What is being done to promote the interagency standardization of policies, direction, and job aids?

A-21. Work is ongoing within the National MAC group and within the National Wildfire Coordinating Group to provide interagency standardization.

Q-22. Are Fire Danger Pocket Cards to be developed and issued for each fuel type on the home Unit?

A-22: The WO letters (file code 5100) of January 11, 2002 and April 5, 2002 provided direction on the issuance of "pocket cards". It has become apparent that issuing a pocket card for every fuel type is not realistic, nor the intent of the direction. FS Units are to develop Fire Danger Pocket Cards using a fuel model or fuel models that appropriately and effectively communicate fire danger on their home unit based upon critical energy release (ERC) and/or Burning Index (BI) threshold values. These pocket cards need to be issued to each fireline supervisor on the home unit or from another sending unit prior to deployment on a FS fire. Additional information on pocket cards is available at: <http://famweb.nwcg.gov/pocketcards/>