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Prescribed Fire Complexity Rating System Guide

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PMS 424

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1 INTRODUCTION

2 Sound risk management is a foundation for all fire management activities. Risks and
3 uncertainties relating to fire management activities must be understood, analyzed,
4 communicated, and managed as they relate to the cost of either doing or not doing an activity
5 (USDA, USDI, et al, 2009).

6 **Complexity** is generally used to characterize something with many parts where those parts
7 interact with each other in multiple ways. In the context of this analysis, complexity refers to the
8 interconnectedness and dependence of the individual elements as they relate to the planning and
9 implementation of the prescribed fire.

10 “Considering the limits imposed by complexity may be the responsible way to engage with the
11 world. Disregarding these limits can lead to the illusion of neutrality or objectivity.” (Cilliers et
12 al. 2013).

13 The complexity analysis process for prescribed fire continues to evolve. Originally designed to
14 assist personnel in determining relative complexity and determination of burn boss qualification,
15 the process has been redesigned as a tool that identifies and characterizes risk to identified values
16 and the technical difficulty or complexity of the ‘work’ involved to mitigate impacts to them.
17 Assessing the risk a prescribed fire poses to identified values consists of estimating the
18 probability and severity of adverse impacts. The Complexity Analysis process provides help
19 with:

- 20 1. Value Identification.
- 21 2. Assessment of Risks to the Values.
- 22 3. Assessment of Technical Difficulty required to mitigate the risk to Values.
- 23 4. A Final Complexity determination that identifies the required burn boss qualification
24 level.

25 The Complexity Analysis is initially integrated into the Prescribed Fire Plan in the Assessment of
26 Risk to Values phase. The individual burn plan elements provide the opportunity to address site
27 specific mitigation measures that will be employed to mitigate the Risk to Values identified. The
28 Technical Difficulty phase evaluates the complexity of implementing the identified mitigation
29 measures.

1 **PURPOSE**

2 The Complexity Analysis is a focused, subjective assessment by experienced prescribed fire burn
3 bosses and evaluated by Agency Administrators. This decision support tool is designed to assist
4 in providing insight and improving understanding of the significant risk-related elements of the
5 prescribed fire.

- 6 • A decision support tool that illuminates the risk to values associated with the prescribed
7 fire implementation.
- 8 • Identification of the technical difficulty (complexity) of managing the risks to the values.
- 9 • Assignment of a complexity rating of high, moderate, or low to the prescribed fire and
10 the level of prescribed fire burn boss qualification level required to implement the
11 prescribed fire.
- 12 • A process that can be used to identify priority prescribed fire plan elements or
13 characteristics that may pose special problems or concerns, for example critical holding
14 points (adjacent values needing protection, areas of potentially problematic fire behavior
15 chimneys, saddles, heavy fuels, etc.), the need for multiple burn organizations,
16 specialized equipment, and special risks or hazards.

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1 **SCOPE**

2 The Complexity Analysis contains three Value Elements and 11 Risk Management and
3 Technical Difficulty Elements.

4 **Value Elements**

- 5 1. On-Site Values
- 6 2. Off-Site Values
- 7 3. Public and Political Interest

8 **Risk Management and Technical Difficulty Elements**

- 9 1. Safety
- 10 2. Fire behavior
- 11 3. Resistance to Containment
- 12 4. Ignition Procedures/Methods
- 13 5. Prescribed Fire Duration
- 14 6. Smoke Management
- 15 7. Number and Dependence of Activities
- 16 8. Management Organization
- 17 9. Treatment Resource Objectives
- 18 10. Constraints
- 19 11. Project Logistics

20 Value Elements are rated according to the quantity of values identified with a prescribed fire
21 project.

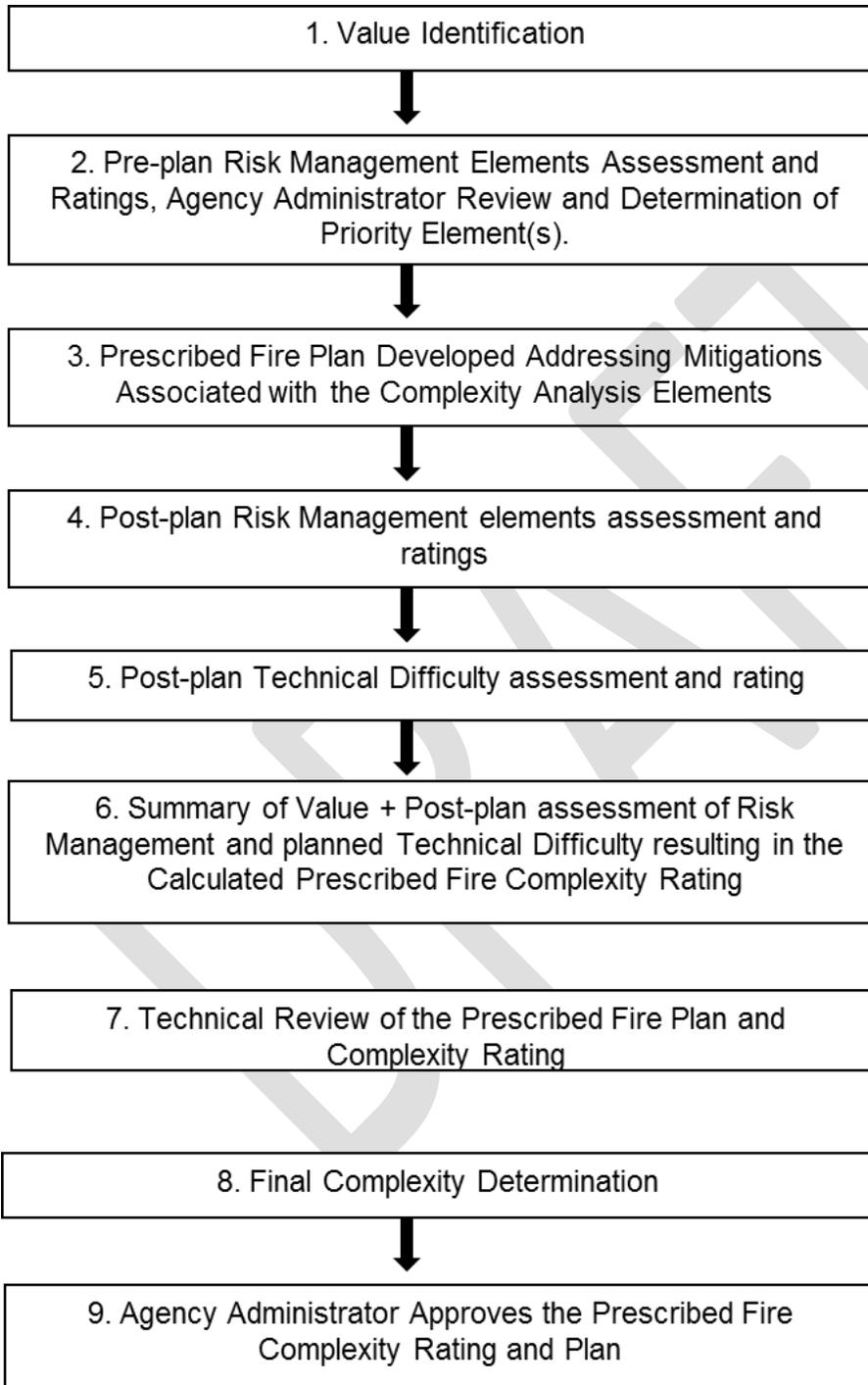
22 The Risk Management and Technical Difficulty Elements rated as Low, Moderate or High, are
23 summarized into an overall prescribed fire complexity rating.

24 A preliminary complexity analysis rating is required early in the prescribed fire plan
25 development stage. The preliminary complexity analysis encourages early line office
26 engagement in the identification of values and the assessment of prescribed fire implementation
27 risk to those values. It will help identify the prescribed fire elements that may be problematic and
28 the mitigation measures to be addressed in the prescribed fire plan. Local knowledge and
29 judgment are important components of the preliminary complexity analysis.

30 The prescribed fire plan is developed while considering the preliminary risk ratings and
31 incorporating any mitigation actions into the appropriate sections of the prescribed fire plan.
32 Once the prescribed fire plan is near completion, the final complexity analysis and rating is
33 determined. The final complexity rating, which acknowledges any remaining risk, will be used as
34 the basis for determining the prescribed fire organization and type of prescribed fire burn boss
35 required to successfully implement the prescribed fire plan.

1 **PROCESS**

2 The complexity of a prescribed fire is determined through the following process



3

1 **Analysis and Documentation Format**

2 The analysis is completed in a spreadsheet to provide a clear, objective summary of the over-all
3 complexity of a prescribed fire. An electronic copy of the spreadsheet can be found at future [url](#)
4 [here \(for this draft review the spreadsheet is attached\)](#). High, Moderate or Low rating levels for
5 each complexity analysis element are accessed through drop-down menus within the spreadsheet.
6 The summarized pre-plan and post-plan complexity ratings are calculated within the spreadsheet
7 and plotted on a visual graphic for ease of comparison.

8 **Prescribed Fire Complexity Elements Rating Descriptions**

9 Rating descriptors guide the risk and technical difficulty element rating process. High, Moderate
10 or Low rating levels are assigned for each of the complexity analysis elements. For each
11 complexity element, descriptors are provided to help determine a rating level. The descriptors are
12 broad enough to capture common situations and assist the preparer in determining the best, most
13 appropriate rating for risks and technical difficulties associated with the values identified in and
14 around the project. The descriptors are not exhaustive; local insight, empirical evidence and site
15 specific information, guidance and policies should also be used to assist the prescribed fire plan
16 preparer to determine the appropriate rating.

17 **Step 1: Value Identification**

18 Determining the complexity of a prescribed fire starts with understanding the on-site, off-site and
19 public and political values associated with the prescribed fire. Values are natural resources,
20 humans and their developments, and public and political (including cultural) features that have
21 inherent worth. NEPA and or other land management plans, documents, inventories, site visits
22 and interdisciplinary team input provide the information necessary to identify those features
23 associated with the project that may be identified as valuable and at risk from negative impacts
24 of the prescribed fire. Identifying the quantity of values is an important part of the value(s)
25 determination.

26 A review of the risk elements and their associated descriptors prior to a project site visit may
27 assist with verifying the values and subsequently assessing the risk to them.

28 The values typically do not change through the complexity assessment process unless that value
29 is physically removed from the project area or area of impact.

30 On the Complexity Analysis Worksheet in Rows 2, 3 and 4, column C, describe and quantify the
31 On-site, Off-site and Social/Political values associated with the prescribed fire.

- 32 • On-Site Values: Valued resources (human, natural, cultural) located within the project
33 area directly affected by implementation of the prescribed fire.
- 34 • Off-Site Values: Valued resources (human, natural, cultural) located outside the project
35 area that may be affected by implementation of the prescribed fire.
- 36 • Public And Political Interest: The degree of public and political interest in the
37 implementation and outcome of the prescribed fire.

1 In Rows 2, 3 and 4, column C, identify the overall quantity of values for each value element.
2 Identify the number of the values that may be impacted by the implementation of the prescribed
3 fire. This will be considered in the final complexity determination.

4 **Step 2: Pre-Plan Risk Management Element Assessment and Rating**

5 ***Step 2a - Pre-Plan Preparation: Risk Management Ratings***

6 On the Complexity Analysis Worksheet and using the Risk Management elements rating
7 descriptors as a guide (Appendix B) or by clicking on one of the three ratings in column C, rate
8 complexity analysis Elements 1-11 to describe the risk to the values identified in Step One
9 process. Evaluate the elements individually by reading the risk descriptors for each element
10 rating level, and then determine the most appropriate level of risk.

11 This is the point where local judgment and experience is important to ensure adequate ratings of
12 risk to the identified values. The descriptors for each level are automatically populated in the
13 associated cell in column D. If a project has unique or site specific descriptions that affect the
14 risk to values that cannot be evaluated with the rating descriptions provided they may be
15 identified in the blank cell associated with each element column D, in the worksheet.

16 The following Risk Management Elements are analyzed:

- 17 1. Safety: Hazards to personnel and public from planned prescribed fire activities through
18 all phases of the prescribed fire. Safety is always also individually considered for all
19 elements
- 20 2. Fire Behavior: The difficulty of achieving the desired range of fire intensity, rate of
21 spread and flame lengths to meet the prescribed fire objectives
- 22 3. Resistance to Containment: The conditions that influence the potential for a prescribed
23 fire to leave the ignition unit or project area and resist containment effort.
- 24 4. Ignition Procedures/Methods: Number and type of ignition devices, patterns, sequencing
25 and/or timing required to safely ignite the prescribed fire and meet the objectives.
- 26 5. Prescribed Fire Duration: The length of time (hours, days or weeks) that active ignition,
27 fire spread and primary holding operations (critical holding points are secure,
28 transitioning to mop-up and patrol etc.) are expected to occur in order to fully implement
29 the prescribed fire.
- 30 6. Smoke Management: The actions implemented by prescribed fire personnel directed at
31 minimizing the amount of smoke entering populated areas or impacting sensitive sites.
32 Smoke management includes avoiding significant deterioration of air quality and
33 violations of National Ambient Air Quality Standards, and minimizing or eliminating
34 visibility impacts in Class I areas.
- 35 7. Number and Dependence of Activities: Number and sequence of activities required to
36 safely implement the prescribed fire and meet objectives through all phases of the project,
37 including logistics, pre and post burn considerations, communication, test fire, ignition
38 and holding operations, contingency actions (if implemented), mop-up and patrol,

1 monitoring, and ensuring firefighter and public safety

2 8. Management Organization: The organizational capabilities needed to safely achieve
3 objectives specified in the prescribed fire plan. This includes all phases of the prescribed
4 fire until declared out.

5 9. Treatment/Resource Objectives: The degree of difficulty to meet specific, measurable,
6 achievable, realistic, time-sensitive objectives. (How large or small is the just-right
7 window?)

8 10. Constraints: Conditions or requirements that place sideboards on the prescribed fire plan
9 implementation. Example: Seasonal timing, logistical restrictions, smoke management,
10 restrictions national preparedness levels four and five.

11 11. Project Logistics: Facilities, services and supplies required to support all phases of the
12 prescribed fire (includes access complexity).

13 ***Step 2b: Preliminary Prescribed Fire Plan Complexity Analysis Review:***

14 Once the values are determined, the preliminary risk ratings made, and the preliminary
15 complexity calculated the analysis preparer briefs the Agency Administrator (AA) to:

- 16 1. Review identified values.
- 17 2. Review the complexity analysis elements preliminary risk ratings.
- 18 3. Identify complexity elements needing emphasis during plan development.

19 ***Review values identified:***

20 This action provides the Agency Administrator the opportunity to review and provide
21 feedback on the identified the values.

22 ***Review the preliminary risk ratings to the identified values:***

23 This action is intended to provide the AA an overview of the risks associated with the
24 prescribed fire and give feedback on the preliminary risk ratings.

25 ***Identify complexity elements needing emphasis during plan development:***

26 Prescribed fire projects often have elements that are critical to mitigating the risk to identified
27 values. During the pre-plan preparation and risk assessment phase the preparer should use the
28 value identification information to identify the values and risk elements that may be
29 considered as key in making the prescribed fire a success. The preparer and agency
30 administrator should take the opportunity to consider and discuss these elements. If the
31 agency administrator determines that the element is important, a 'yes' is documented on the
32 spreadsheet in column E. These important elements should be given greater emphasis when
33 developing the prescribed fire plan and subsequently deciding the overall complexity rating.

34 **Step 3: Develop the Prescribed Fire Plan**

35 Once the agency administrator concurs with the identified values and the associated preliminary
36 risk assessment, the prescribed fire plan is developed. When developing the prescribed fire plan,
37 identify the constraining and/or mitigating actions that are planned to manage the project's risks

1 to values and determine a final complexity rating. The goal of prescribed fire plan development
2 is to define a prescribed fire treatment that meets objectives while mitigating the Risk to Values
3 to an acceptable level, considering the Technical Difficulty of managing those risks. Mitigation
4 measures should be developed in the prescribed fire plan that will lower the higher preliminary
5 risk ratings to an acceptable level. In some situations the rating will stay the same. When
6 developing the prescribed fire plan consider the important elements identified in the agency
7 administrator review briefing. Apply the adaptive management process by using lessons learned
8 or monitoring reports from other projects to provide input into prescribed fire plan development.

9 The Complexity Analysis and prescribed fire plan elements are not independent. Mitigating the
10 risk of a complexity element through the prescribed fire plan may affect other complexity
11 elements and require additional information or activities to be identified in other prescribed fire
12 plan elements. For example, adding more holding resources in the prescribed fire plan to mitigate
13 risk to an off-site value may increase the risk and technical difficulty related to management
14 organization, number and dependence of activities, logistics and others.

15 The *Complexity Analysis and Prescribed Fire Plan Elements Crosswalk* (Appendix A) provides
16 information on linkages between the complexity analysis and the prescribed fire plan elements.
17 The crosswalk can be used as a checklist to ensure elements rated in the complexity analysis are
18 addressed in the prescribed fire plan.

19 **Step 4: Post-plan Risk Management Elements Assessment and Ratings**

20 ***Step 4a - Re-rate the Risk Management Elements***

21 At the completion of the prescribed fire planning phase, the complexity analysis Risk
22 Management elements are again rated on the Complexity Analysis worksheet; columns F and G,
23 to identify if risk was mitigated during the preparation of the prescribed fire plan. The Risk
24 Management element descriptors are once again used to guide the decision process. The
25 elements may or may not have changed from your initial rating. One element could go up or
26 down based on what you learned in the planning process, i.e. fire behavior was overestimated
27 because the actual fuel loading was less than first considered. Those unique project or site-
28 specific descriptions that affect the risk to values are carried over from pre-plan risk
29 determination to the associated blank cell in column G, in the worksheet.

30 ***Step 4b – Identifying Mitigation***

31 An important part of the post plan analysis is documenting where the risk was managed or
32 mitigated by the prescribed fire plan elements. Mitigation actions developed in the plan are
33 identified on the Complexity Analysis worksheet; column H. Example: The fire behavior
34 prescription has very specific fuel moisture, environmental parameters, and resulting fire
35 behavior that presents potentially high risk. Identify Prescribed Fire Plan Element 7
36 (Prescription) as the element in the prescribed fire plan where this mitigation is reflected. If no
37 opportunity for mitigation existed or was required leave this cell blank.

1 **Step 5: Post-Plan Technical Difficulty Rating**

2 Technical Difficulty is the level of skill and effort required to implement the mitigation actions
3 for the identified risk for each element in the prescribed fire plan. The post plan technical
4 difficulty rating provides a broad picture of the complexities associated with managing the risk to
5 the elements. Use the *Risk and Technical Difficulty Descriptors* (Appendix B) or by choosing
6 one of the three ratings in columns I on the spreadsheet as a guide to describe and rate the
7 technical difficulty for elements 1-11 in column I of the analysis Worksheet.

8 Those unique project or site specific descriptions that affect the technical difficulty to mitigate
9 the risks are identified in the associated blank cell in column J in the worksheet.

10 **Step 6: Calculated Prescribed Fire Summary Complexity Rating**

11 The Summary Complexity Assessment combines the Post Plan Managed Risk and Technical
12 Difficulty ratings into a calculated summary complexity rating. This an objective recommended
13 complexity rating calculated within the worksheet. The graphic slider bar provides a visual
14 representation of the calculated prescribed fire summary complexity.

15 **Step 7: Technical Review of the Prescribed Fire Plan and Complexity Analysis**

16 The Complexity Analysis is reviewed as part of the Prescribed Fire Plan Technical Review
17 process. Every prescribed fire plan must receive a technical review prior to the agency
18 administrator approval. The technical review ensures compliant prescribed fire plan content as
19 well as an evaluation of the risk and complexity analysis to ensure that the prescribed fire goals
20 and objectives can safely and successfully be achieved. The technical reviewer provides
21 concurrence of the final complexity determination and provides recommended modifications to
22 the plan including the complexity analysis.

23 When technically reviewing the complexity analysis the reviewer should pay attention to how
24 the risk and technical difficulty elements where mitigated in the plan. The technical reviewer
25 should ensure a good rationale was made for those elements that were rated high but could not be
26 mitigated down as a result of the prescribed fire planning process.

27 For qualifications, roles and responsibilities of the technical reviewer and the technical review
28 process see the *Interagency Prescribed Fire Planning and Implementation Procedures Guide*
29 (PMS 484, April 2014).

30 **Step 8: Final Prescribed Fire Complexity Rating**

31 The final rating for each prescribed fire complexity analysis element is identified in Row K. The
32 final prescribed fire complexity is manually identified in Column C, Row 42 of the analysis
33 spreadsheet. The determination of complexity should be based on the calculated rating, the
34 technical review and an evaluation of how the prescribed fire plan mitigated pre-plan risks to
35 values considering the technical difficulty (complexity) of the required mitigation. Be sure to re-
36 consider the quantity of values identified earlier. The evaluation should be completed after a

1 discussion between the agency administrator, local fire management and the prescribed fire plan
2 preparer and technical reviewer. The elements deemed important should be given greater
3 emphasis when deciding the overall rating. If, as a result of the discussion the administrator feels
4 that a higher or lower rating from what is identified in the calculated summary complexity is
5 appropriate, the administrator may make an adjustment and the rationale for the determination is
6 documented in the rationale cell. If they accept the calculated complexity rating and technical
7 review the concurrence is documented in the rationale box. The rationale will clearly justify the
8 rating for the prescribed fire. At a minimum, elements rated high that cannot be mitigated in the
9 prescribed fire plan must be discussed in the rationale. The final determination of prescribed fire
10 complexity will be made per agency policy. In most cases the agency administrator is required to
11 make the final determination.

12 **The final complexity determination high, moderate, or low identifies the level of prescribed**
13 **fire burn boss qualification level required to implement the prescribed fire.**

14 The complexity analysis print copy worksheet must be signed and dated by the prescribed fire
15 plan preparer, the technical reviewer and agency administrator. The signed print copy is inserted
16 into the prescribed fire plan as Element 3. An electronic copy of the completed worksheet is
17 retained in the electronic file for the project.

18 **Step 9: Agency Administrator Approves the Prescribed Fire Plan**

19 Once the technical review process is complete the agency administrator signs the prescribed fire
20 plan per instructions in the *Interagency Prescribed Fire Planning and Implementation*
21 *Procedures Guide* (PMS 484, April 2014).

APPENDIX A. COMPLEXITY ANALYSIS AND PRESCRIBED FIRE PLAN ELEMENTS CROSSWALK

This crosswalk provides information on linkages between the complexity analysis and the prescribed fire plan elements. The crosswalk can be used as a checklist to ensure elements rated in the complexity analysis are addressed in the prescribed fire plan.

Complexity Guide Element	RX Fire Plan Element																					
	1 Signature Page	2a AA Ignition Authorization	2b RX Go/No Go	3 Complexity Analysis Summary	4 Description of RX Fire Area	5 Objectives	6 Funding	7 Prescription	8 Scheduling	9 Pre-burn Considerations and Weather	10 Briefing	11 Organization and Equipment	12 Communication	13 Public and Personnel Safety, medical	14 Test Fire	15 Ignition Plan	16 Holding Plan	17 Contingency Plan	18 Wildfire declaration	19 Smoke Management and Air Quality	20 Monitoring	21 Post-Burn Activities
1 Off Site Values					X	X				X												
2 On Site Values					X	X				X												
3 Public and Political Interest					X					X												
4 Safety						X		X	X	X		X	X	X		X	X	X		X		
5 Smoke					X			X	X	X		X	X	X	X	X	X	X		X	X	
6 Number and Dependence of Activities								X	X	X		X		X		X	X	X				
7 Fire Behavior					X	X		X	X	X		X	X	X	X	X	X	X		X	X	
8 Management Organization								X	X	X		X		X		X	X	X				
9 Fire Treatment Objectives						X		X	X	X			X	X						X	X	
10 Constraints					X	X		X	X	X		X		X		X	X	X		X	X	
11 Ignition Procedures						X		X		X		X		X		X		X		X		
12 Logistics						X			X	X		X		X		X	X	X				
13 Duration						X		X	X	X		X	X	X		X	X	X		X	X	
14 Resistance to Containments					X	X		X	X	X		X		X	X	X	X	X				

*Gray shading means these elements don't need to be rated for complexity. Red X's indicate a high degree of interaction between the complexity analysis element and the RXBP element (in most cases). Black X's indicate a moderate degree of interaction (in most cases). Gray X's indicate a low degree of interaction (in most cases). Blank boxes indicate a minimal degree of interaction between the complexity analysis element and the RXBP element (in most cases).

APPENDIX B. RISK AND TECHNICAL DIFFICULTY DESCRIPTORS

1. Safety

Hazards to personnel and public from planned prescribed fire activities through all phases of the prescribed fire. Safety is always also individually considered for all elements.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • Safety issues and hazards are easily identifiable, addressed in briefings, and managed. • Minimal organization produces little exposure of personnel to hazards. • Adverse impacts to public health and safety are unlikely. • Activities are high frequency/low risk. • Fatigue and exposure to hazards are limited. • Standard safety briefings and attention to LCES are sufficient. 	<ul style="list-style-type: none"> • Safety issues are pronounced and require detailed briefings, with certain hazards requiring special caution. • Single branch of organization results in modest exposure of personnel to hazards. • Adverse impacts to public health and safety are possible. • At least one activity is low frequency/high risk. • Fatigue and extended exposure to hazards are anticipated. 	<ul style="list-style-type: none"> • Complex safety issues and significant hazards exist that require special briefings and cautions. • Multiple branches of organization results in an increase of hazard exposure to personnel. • Adverse impacts to public health and safety are likely without appropriate mitigation. • Several activities are low frequency/high risk. • Fatigue and prolonged exposure to hazards require major consideration and specific mitigation.

Technical Difficulty

The degree of skill required by prescribed fire personnel and the relative difficulty of implementing mitigation actions identified in the prescribed fire plan that are directed at minimizing hazards to personnel and the public from environmental or prescribed fire activities through all phases of the prescribed fire.

Low	Moderate	High
<ul style="list-style-type: none"> • No special actions are required to mitigate potential minor accidents or injuries identified in the risk assessment/JHA. • Safety concerns can be easily mitigated through LCES. • No preparation work or special project design features are required. 	<ul style="list-style-type: none"> • Potential serious accidents/injuries or multiple accidents/injuries to personnel or public are mitigated by standard safety briefings and identified in existing risk assessments/JHA. • Special emphasis is needed for some elements of LCES. Some standard preparation work and/or project design features are required. 	<ul style="list-style-type: none"> • Potential for serious accidents/injuries or multiple accidents/injuries to personnel or public have to be addressed with specific safety briefings. • Unusual number of JHAs or risk assessment elements is required to be analyzed. • A new risk assessment or JHA is required to be developed. • Careful attention to all elements of LCES is required. • Special or unique mitigation efforts are required. • Safety Officer is recommended.

2. Fire Behavior

The difficulty of achieving the desired range of fire intensity, rate of spread and flame lengths to meet the prescribed fire objectives.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • Fuels are uniform and/or loading is light and can be characterized using a single fuel model. • No control challenges are expected • Terrain is mostly flat or the slope and aspect are uniform, leading to a relatively unvarying fire. • Winds, microclimate, and other fire conditions are relatively uniform. • Fire behavior is highly predictable. • Fire is primarily a two-dimensional surface fire. • Fire spread is not likely to occur or contribute to any control problems 	<ul style="list-style-type: none"> • Fuels vary within the unit, both in loading and arrangement. • Fire behavior may present control challenges that are easily mitigated. • Medium loadings with some high concentrations are present. • Variable terrain features may significantly affect fire behavior and present moderate ignition and control problems. • Local winds and burning conditions may vary enough to cause shifts in fire behavior that briefly exceed modeled fire behavior and threaten controllability. • Periodic torching can be expected either as isolated points or in limited areas. • Probability of ignition outside of the unit is low and any spotting is expected to be short-range. 	<ul style="list-style-type: none"> • Major variations in the fuel complex are likely to result in more intense fire behavior variations. • Wide variations in fire behavior may present major control challenges. • Terrain encompasses a wide range in slope steepness, abrupt changes in slope, and several directional aspects that lead to widely variable and unpredictable local winds and microclimate differences. • High intensity fire behavior may be expected outside the unit with high rates of spread, torching, possible crown fire runs. • Probability of ignition outside of the unit is high and short and long range spotting can be expected. • Potential fire spread and behavior outside the unit is greater than inside the unit.

Technical Difficulty

What degree of skill is required by prescribed fire personnel for predicting, producing, and sustaining the desired range of fire intensity, rate of spread and flame lengths to meet the prescribed fire objectives? What is the difficulty of maintaining containment of the prescribed fire under required fire behaviors to meet objectives? Are there specific skills or equipment needed for special or unusual ignition devices to produce or sustain desired fire behavior(s) *i.e terra / helitorch, PSD?*

Low	Moderate	High
<ul style="list-style-type: none"> • Standard fire safety precautions are adequate to ensure personnel safety. • No fire behavior variations are expected. • The number, size or likelihood of spot fires and slop overs do not require additional suppression resources. • Fire behavior is such that holding forces can control possible spot fires and slop overs using direct attack tactics. 	<ul style="list-style-type: none"> • Some special provisions for safety are needed to protect personnel. • Fire behavior variations are minimal and do not require multiple fuel models to account for the fire behavior. • At least one barrier or containment opportunity exists. • Fire behavior is such that holding resources may need to use indirect tactics to control some spot 	<ul style="list-style-type: none"> • Fire behavior may create unique safety problems or the need for special escape routes or other safety measures. • Fire behavior variations require the use of several fuel models to develop the prescription parameters. • Limited containment opportunities exist. • Fire behavior is such that additional holding resources would be required along with indirect

Low	Moderate	High
<ul style="list-style-type: none"> No on-site operational fire behavior specialists are required. 	<p>fires and slop overs.</p> <ul style="list-style-type: none"> Occasional on-site fire behavior assessments or calculations may be needed and can be performed as a collateral duty. ERTs and SMTs require a close adherence to the prescription in the Rx plan. 	<p>attack tactics.</p> <ul style="list-style-type: none"> Systematic fire behavior assessments and calculations are needed by a dedicated skill position. FBAN or LTAN is suggested for short or long duration prescribed fire operations, respectively. ERTs and SMTs require a strict adherence to the prescription in the Rx plan.

DRAFT

3. Resistance to Containment

The conditions that influence the potential for a prescribed fire to leave the ignition unit or project area and resist containment efforts.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • Ranges from no potential to a likelihood of few mechanisms such as spot fires, slop overs or fire creeping, each comprising small areas that are readily detected, accessed, and controlled by holding resources available on the burn. • No ladder fuels or concentrations are near critical holding points. • Ignition procedures do not create intense fire behavior. • Probability of ignition in fuels outside the unit does is low. • Local drought and or fire danger indices are expected to be low. 	<ul style="list-style-type: none"> • Potential for multiple wildfire mechanisms such as spot fires or slop overs that can propagate at moderate rates of spread but can be held by prompt holding actions. • Some fuel concentrations or ladder fuels exist near critical holding points. • Expected fire intensities in the primary fuel type create little potential to challenge standard fire lines. • The probability of ignition in fuels outside of control lines is low to moderate. • Some dependency on natural fuel breaks to hold the prescribed fire. • Local drought and or fire indices are expected to be moderate. 	<ul style="list-style-type: none"> • There is a potential for multiple wildfire mechanisms (spot fires, slop-overs, fire creeping etc.) that exceeds the capability of the holding force to detect and suppress. • Fuel concentrations near critical holding points include ladder fuels that challenge holding operations. • Expected fire intensities in the primary fuel type creates potential to challenge standard fire lines. • Probability of ignition in fuels outside the unit is moderate to high. • High dependence on natural fuel breaks to hold the prescribed fire. • Local drought and or fire indices are expected to be high.

Technical Difficulty

The conditions that influence the potential for a prescribed fire to leave the ignition unit or project area and resist containment efforts.

Low	Moderate	High
<ul style="list-style-type: none"> • Minimal holding resources are involved in the holding operation. • The burn unit and project area is easily accessible to the holding resources identified in the plan. • Minimal line width required to contain expected fire spread. • Minimal site prep is required. 	<ul style="list-style-type: none"> • Several types of resources are involved in the holding operation. • Some portions of the burn unit and project area are not easily accessible to the holding resources. • Expected fire behavior outside the unit may require developing indirect attack options. • Areas outside of the project area have specific suppression action constraints or are on other jurisdictional lands that may limit containment efforts. • Some site prep is required. • Expected fire behavior outside of the unit requires moderate contingency planning. 	<ul style="list-style-type: none"> • All types of resources (including aerial) are involved in the holding operation. • Several portions of the burn unit and project area are not easily accessible and or some portions are inaccessible to the holding resources. • Expected fire behavior outside the unit requires development of indirect attack plans. • If the prescribed fire leaves the burn unit boundary it will enter a highly restrictive suppression resource area such as wilderness, swamp, UXO, cultural site that will directly impact on site holding resource ability to contain the fire. • Extensive site preparation is required. • Expected fire behavior outside of the unit requires

Low	Moderate	High
		extensive contingency planning.

4. Ignition Procedures/Methods

Number and type of ignition devices, patterns, sequencing and/or timing required to safely ignite the prescribed fire and meet project objectives.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • An unexpected or adverse event is unlikely and coordination of firing sequence, patterns and timing is not critical to meet project objectives. • Specific heat intensities or ROS are not critical for meeting resource objectives. 	<ul style="list-style-type: none"> • Multiple firing sequences patterns and timing must be coordinated to meet project objectives and reduce the risk of an unexpected or adverse event. • Specific heat intensities or ROS are somewhat critical for meeting resource objectives but are readily attained by placing local skill sets in firing boss positions. 	<ul style="list-style-type: none"> • Multiple firing devices, firing sequences, patterns, coordination and timing are critical to meet project objectives and reduce the risk of an unexpected adverse event. • Specific heat intensities or ROS are critical for meeting resource objectives. The use of local skill sets in supervision and lighting is mandatory for meeting objectives.

Technical Difficulty

The skill level(s) of the prescribed fire team to adequately manage the number and type of ignition devices, patterns, sequencing and/or timing required to safely ignite the prescribed fire and meet project objectives.

Low	Moderate	High
<ul style="list-style-type: none"> • There is no need for special firing equipment, techniques, or patterns. • Firing procedures are simple and ignition team is small. • Use of only one type of ignition device is planned. • The ignition pattern requires minimal supervision of the lighters to achieve project objectives and manage safety concerns. • Communications are easily maintained with a single tactical frequency. • The entire project area is readily visible to the Firing/Burn Boss. 	<ul style="list-style-type: none"> • The need for multiple firing devices, sequences, techniques, or patterns has been identified. • Firing procedures are somewhat complex in at least some portions of the project area and the ignition team may be broken into two or more squads. • Two different types of ignition platforms are planned. • The ignition pattern requires direct control of the lighters to achieve project objectives and manage safety concerns. • Communications may require the use of a command (repeater) and at least two tactical frequencies will be used. • The project area is large but can be observed from high points and terrain and/or distance does not contribute to sequence and timing problems. 	<ul style="list-style-type: none"> • The need for multiple special firing equipment or different techniques or firing sequences or patterns has been identified. • Firing procedures are complex and the ignition function may be broken into multiple teams with more than one Ignition Specialist used. • Simultaneous ignitions will occur that require precise timing and communications to insure safety. • Ignition patterns and techniques to manipulate fire behavior are used and require tight control of the lighters to achieve project objectives and manage safety concerns. • Specialized communication equipment and planning (Portable or human repeater) is necessary to direct ignition operations. • More than three tactical frequencies will be used.

Low	Moderate	High
		<ul style="list-style-type: none">• Many portions of the project area are not readily visible to the Firing Boss and Burn Boss.

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5. Prescribed Fire Duration

The length of time (hours, days or weeks) that active ignition, fire spread and primary holding operations (critical holding points are secure, transitioning to mop-up and patrol etc.) are expected to occur in order to fully implement the prescribed fire.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • Ignition operations should be accomplished within one operational period. • Burn unit is small in size and residual burning is not expected after primary burn out of the unit. • Decrease in seasonal severity is expected. • Short time frame does not require special logistical support. • Mop up is minimal or none is anticipated/planned. 	<ul style="list-style-type: none"> • Active ignition and or fire spread is expected to occur within the unit for several operational periods. • Some residual burning (heavy fuel smoldering, stump holes, etc.) is expected to occur for at least a week after the primary burn out of the unit. • Mop up and patrol is typical with minimal resource and equipment needs. • An unfavorable weather event is unlikely through primary holding phase. 	<ul style="list-style-type: none"> • Long term active ignition operations or fire spread greater than one week are required to meet prescribed fire objectives. • A large amount of residual burning (heavy fuel smoldering, stump holes, etc.) or residual burning over a large area is expected to occur for at least a week after the primary ignition of the unit. • Long term mop up and patrol with multiple resource types and equipment. • Long term weather forecasts show possibility of an unfavorable weather event occurring through the primary holding phase.

Technical Difficulty

The length of time (hours, days or weeks) that active ignition, fire spread and primary holding operations (critical holding points are secure, transitioning to mop-up and patrol etc.) are expected to occur in order to fully implement the prescribed fire.

Low	Moderate	High
<ul style="list-style-type: none"> • Ignition and mop-up operations are usually completed in 1 to 2 operational periods. • Mop up and patrol is typical with minimal resource and equipment needs. • Standard press release is sufficient for public notification. 	<ul style="list-style-type: none"> • Ignition and mop-up operations are usually completed within 3 - 7 operational periods. • Multiple shifts may need staffing (day/night). • Required staffing may affect resource availability for other prescribed fires. • Additional dispatch support may be required. • Standard press release is sufficient for public notification. • The units Public Affairs Office is required to be available to field questions from media and public. • Some fire behavior assessment is necessary to 	<ul style="list-style-type: none"> • Ignition, mop-up and patrol operations will last longer than 7 days, potentially for weeks. • Management organization will have to be adjusted to account for fire activity. • Multiple resource types and equipment. • Systematic fire behavior assessments and calculations are needed by a dedicated skill position. (SOPL, FBAN or LTAN) • Additional dispatch support will be required. • A dedicated PAO will be on-site to field questions from media and public. • MAPs are required that will address how the fire will be managed if unfavorable events occur.

Low	Moderate	High
	<p>identify potential seasonality fire behavior.</p> <ul style="list-style-type: none"> • Only a few MAPS are needed to identify how the fire will be managed if unfavorable events occur. • The length of time to complete the project and the size of the organization needed may increase. • ERTs and SMTs require daily attention to ensure that smoke constraints are not exceeded. 	<ul style="list-style-type: none"> • The length of time to complete the project and the size of organization will increase as season progresses. • Close coordination with States Department of Environmental Quality will be needed to ensure that short and long term smoke outputs can be managed and constraints are not exceeded.

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6. Smoke Management

The actions implemented by prescribed fire personnel directed at minimizing the amount of smoke entering populated areas or impacting sensitive sites. Includes avoiding significant deterioration of air quality and violations of National Ambient Air Quality Standards, and mitigating human-caused visibility impacts in Class I areas. (NWCG Glossary).

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • Smoke concerns are generally few or easily mitigated. • Smoke will be short-lived or inconspicuous. • Exposure to smoke by firefighters and the public will be minimal. • Few concerns exist about smoke from nearby communities. 	<ul style="list-style-type: none"> • Noticeable smoke will be produced for several days. • Short-term health or safety concerns related to smoke exposure may occur if actual weather deviates from forecasted. • Nearby communities are highly conscious of smoke from wildland fire. • Some possibility for a NAAQS exceedance violation. • The prescription or ignition portions of the plan need to consider smoke management. 	<ul style="list-style-type: none"> • Conspicuous smoke will be produced for a week or more. • The possibility of health and safety issues due to smoke exposure. • Strong, widespread social/political concern about smoke is common in the affected area. • High possibility for a NAAQS exceedance violation. • Smoke impacts affect several burn plan elements.

Technical Difficulty

The degree of skill required by prescribed fire personnel and the relative difficulty of implementing the prescribed fire plan actions directed at minimizing the amount of smoke entering populated areas or impacting sensitive sites, avoiding significant deterioration of air quality and violations of National Ambient Air Quality Standards, and mitigating human-caused visibility impacts in Class I areas.

Low	Moderate	High
<ul style="list-style-type: none"> • Emission reduction techniques (ERTs) and smoke management techniques (SMTs) are simple, routine and straightforward to achieve and will provide desirable smoke management outcomes. • Some limitations may be present in the plan. • Wind and dispersion parameters are not constrained. • No sensitive receptors exist. • Minimal to no coordination with air quality officials is required. 	<ul style="list-style-type: none"> • ERTs and SMTs require skilled application of the prescribed fire prescription. • Some considerations are needed in the prescription or ignition portions of the plan to employ ERTs, and SMTs. • Wind parameters are constrained but easy to achieve. • Sensitive receptors exist. • Burn window/opportunities are reduced by the required weather/dispersion conditions. • Normal coordination with air quality officials is required. • Some mitigation measures or additional smoke 	<ul style="list-style-type: none"> • Several considerations are needed in the prescribed fire plan in order to balance ERTs and SMTs against prescribed fire objectives. • Must be implemented under multiple specific constraints (specific wind parameters, season, etc.) to prevent impacts to sensitive smoke receptors. • Burn window/opportunities are limited by the required weather/dispersion conditions. • Special coordination with air quality officials is required. • Accelerated mop up may be planned to reduce smoke impacts.

Low	Moderate	High
	<p>modeling may be needed to address potential concerns with smoke impacts.</p> <ul style="list-style-type: none"> • Specific smoke monitoring may be required to determine smoke plume heights and directions. • Rotating project personnel out of dense smoke may be necessary but easy to accomplish. • Daily smoke management forecasts are adequate. 	<ul style="list-style-type: none"> • Some mitigation measures or additional smoke modeling are required to address potential concerns with smoke impacts. • Specific smoke monitoring is required to determine smoke plume heights and directions. • Rotating project personnel out of dense smoke is necessary but may be difficult to accomplish. • Forecasts of long term atmospheric stability are required due to duration of burn.

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7. Number and Dependence of Activities

Number and sequence of activities required to safely implement the prescribed fire and meet objectives through all phases of the project, includes logistics, pre and post burn considerations, communication, test fire, ignition and holding operations, contingency actions (if implemented), mop-up and patrol, monitoring, firefighter and public safety.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • Activities are mostly independent from each other. • Coordination of activities is simple and straightforward. • The project does not involve another land management agency or jurisdiction. 	<ul style="list-style-type: none"> • Several activities depend on achievement of previous or concurrent actions. • Several activities are interactive. • Communication is routine for coordination of activities and project success. • The project involves another land management agency, ownership or jurisdiction but project completion is not dependent on coordinated implementation. • Adjacent ownership supports the implementation of the prescribed fire. 	<ul style="list-style-type: none"> • Numerous highly interactive activities are required for project success. • Numerous activities are complex and highly interactive. • High degree of coordination is required to manage prescribed fire implementation. • The project involves other land management agencies or jurisdictions and project completion is dependent on coordinated implementation. • Adjacent lands are excluded due to the lack of support for the prescribed fire treatment.

Technical Difficulty

The degree of skill required and the relative difficulty of implementing actions directed at managing and coordinating the number and sequence of activities required to safely implement and meet objectives through all phases of the project. This includes logistics, pre and post burn considerations, communication, test fire, ignition and holding operations, contingency actions (if implemented), mop-up and patrol, monitoring, firefighter and public safety.

Low	Moderate	High
<ul style="list-style-type: none"> • Minimal difficulty in coordinating the required activities. • Holding and lighting are loosely dependent on each other. • Coordination problems or communication failures or issues will not affect the completion of the project. • No special positions are required for implementation. • No to very few pre-burn considerations are required. 	<ul style="list-style-type: none"> • Holding and lighting require close coordination and are dependent on each other to prevent spots or slop overs. • Continuous communication is necessary for successful project completion. • Special positions may be required for implementation. • Some pre-burn considerations are required before ignition. 	<ul style="list-style-type: none"> • Requires a highly skilled team to successfully complete the project. • Multiple pre-burn considerations are required to take place before ignition. • Specific positions are required for implementation. • Requires implementation personnel to be familiar with capabilities of the resources used. • Continuous coordination and communication is critical to the success of the project.

8. Management Organization

The organizational capabilities needed to safely achieve objectives specified in the prescribed fire plan. This includes all phases of the prescribed fire until declared out.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • A small number of qualified people are required to implement the prescribed fire. • A single person may fill several positions. • A single level of supervision is all that is needed (i.e. Burn Boss plus lighters and holders). 	<ul style="list-style-type: none"> • Two levels of supervision are needed (i.e. Burn Boss, Ignition Specialist and/or Holding Specialist plus lighters and holders). • A single person may fill no more than two positions. • Special skills or supervision required for one function. (RXB2 is suggested) 	<ul style="list-style-type: none"> • Three levels of supervision may be needed (i.e. Burn Boss, FIRB, Holding Function, plus Squad Leaders and Squads) or multiple teams are needed to cover multiple shifts or a long-duration project. • A single person may not fill more than one position. • Special skills or supervision required for more than one function. (RXB1 suggested) • Large organization increases potential for safety issues. • Considerable pre-burn preparation work is required.

Technical Difficulty

What are organizational capabilities needed to safely achieve objectives specified in the prescribed fire plan. This includes all phases of the prescribed fire until declared out.

Low	Moderate	High
<ul style="list-style-type: none"> • All team members are available within the local unit and are familiar with local factors affecting project implementation. • Several qualified personnel are available. • The operation is carried out employing a small burn crew. • There is no special pre-burn preparation organization is required. 	<ul style="list-style-type: none"> • At least one primary team member may need to come from outside of the local unit and may not be familiar with local factors. • The numbers of qualified personnel available on the local unit are limited. • Special skills or supervision required for one function. (RXB2 suggested) • Some pre-burn preparation work may require special organizational planning and/or coordination. • Protection of resource values requires extra considerations when developing certain elements of the prescribed fire plan. 	<ul style="list-style-type: none"> • Numerous and varied resources require a large team of specialized positions. • The burn has difficult access, complicated logistics, potentially conflicting objectives, unusual fuel complexes, and is proximate to smoke sensitive/non-attainment areas or wildland urban interface, and/or large scale/long duration. • The Burn Boss and/or two or more primary team members may need to be ordered from outside the local unit and may not be familiar with local factors. • Certain skills and qualified personnel are not available on the local unit.

Low	Moderate	High
		<ul style="list-style-type: none"> • Protection of values requires the development of special ignition AND holding plans. • Special skills or supervision required for more than one function. An RXB1 is suggested. • Numerous resources required for mop up and patrol.

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9. Treatment Resource Objectives

The degree of difficulty to meet specific, measurable, achievable, realistic, time-sensitive resource objectives. (How big is the just right window?)

Risk Management

Low	Moderate	High
<ul style="list-style-type: none"> • Few if any issues are present that hamper meeting treatment resource objectives. • Few or no adverse impacts are expected if resource objectives are not met. • No critical holding points. 	<ul style="list-style-type: none"> • Issues are present that hamper or may prevent meeting treatment resource objectives. • Failure to meet objectives could have short-term adverse impacts. • Associated resources could be damaged if the prescribed fire did not meet resource objectives. • Few critical holding points. 	<ul style="list-style-type: none"> • Substantial issues are present that hamper or prevent meeting treatment resource objectives. • Failure to meet objectives may have adverse long-term impacts to resources. • Associated resources would be damaged if the prescribed fire did not meet resource objectives. • High intensity fire behavior is required in the unit to meet objectives. • Many critical holding points and considerable pre-burn preparation work is required to meet resource objectives.

Technical Difficulty

The degree of difficulty to meet specific, measurable, achievable, realistic, time-sensitive (S.M.A.R.T) resource objectives. (How big is the just right window?)

Low	Moderate	High
<ul style="list-style-type: none"> • There are few resource objectives to meet. • Measures to achieve the objectives are easy to complete and there are few or no restrictions on techniques. • There are few or no restrictions on techniques and prescription parameters. • Basic monitoring of fire behavior and weather is needed to determine if prescribed fire objectives are being met. • Many other opportunities will exist to meet objectives in a given year. • Pre-burn site preparation is not required to meet resource objectives. 	<ul style="list-style-type: none"> • There are several resource objectives to meet. • Measures to achieve the objectives are either 1) easy to complete but there are restrictions on the techniques or 2) moderately difficult to complete and there are few or no restrictions on techniques. • Additional monitoring of fire behavior and weather is needed to determine if prescribed fire objectives are being met. • Other opportunities to meet objectives are very limited in a given year. 	<ul style="list-style-type: none"> • There are a high number of resource objectives. • Measures to achieve the objectives are both moderately difficult/difficult to achieve and there are restrictions on the techniques. • Extensive monitoring of fire behavior and weather is needed to determine if prescribed fire objectives are being met. • Opportunities to meet objectives are not available every year or may not be achievable without extensive fuels preparation work. • Objectives include changes in several strata of vegetation for ecosystem restoration or hazardous fuels reduction.

10. Constraints

Conditions or requirements that restrict or limit (place side-boards on) prescribed fire implementation. Example: Seasonal timing, logistical restrictions, smoke management, restrictions at national preparedness levels four and five, etc.

Risk Management

Low	Moderate	High
<ul style="list-style-type: none">• Constraints exist with little impact on implementing the prescribed fire or achieving objectives.	<ul style="list-style-type: none">• Constraints exist with some constraints imposing limits on implementing the prescribed fire or achieving objectives.	<ul style="list-style-type: none">• Significant and/or competing constraints exist and impose limits on implementing the prescribed fire or achieving objectives.

Technical Difficulty

Assesses the level of skills required to adequately plan for and safely execute the prescribed fire within identified constraints while still achieving desired objectives.

Low	Moderate	High
<ul style="list-style-type: none">• Constraints are easily accommodated and do not increase the difficulty of completing the project or achieving objectives.• Required weather and fuel conditions are locally very common.	<ul style="list-style-type: none">• Some constraints are not easily accommodated and increase the difficulty of completing the project or achieving objectives.• Some prescribed fire parameters are dependent upon marginal environmental conditions.• The length of time to complete the project and the size of the organization may need to be increased.	<ul style="list-style-type: none">• Constraints are hard to accommodate and significantly increase the difficulty of completing the project or achieving objectives.• Windows of opportunity or conditions within prescribed parameters rarely occur in the project area.• The length of time to complete the project and the size of organization will need to be increased and project feasibility may be in doubt.

11. Project Logistics

Facilities, services and supplies required to support all phases of the prescribed fire (includes access complexity).

Risk

Low	Moderate	High
<ul style="list-style-type: none"> Minimal logistical support is needed to safely meet prescribed fire objectives. No special equipment, support or communications needs are required. 	<ul style="list-style-type: none"> Some phases of the prescribed fire may require logistical support in order to safely meet project objectives. Limited amount of special equipment or communication equipment requiring more intensive logistical support may be needed to complete the project. 	<ul style="list-style-type: none"> Extensive dedicated logistical support through most phases of the prescribed fire is required to safely meet project objectives. Large amount of equipment or a communications network is needed that require intensive logistical support.

Technical Difficulty

The difficulty and skill required to obtain all required facilities, services and supplies to support all phases of the prescribed fire (includes access into and out of project area).

Low	Moderate	High
<ul style="list-style-type: none"> No specific logistic function is required and the local unit will handle their own support needs. Project is nearby and easily accessible. Local cache can supply the needs of the prescribed fire. 	<ul style="list-style-type: none"> Project implementation requires a small logistical support operation. Logistical support may be combined with other functions. Obtaining some personnel may require additional contacts and advanced scheduling. Additional support may be needed for out-of-area personnel. Project duration may require a resupply to ensure successful remote prescribed fire implementation. Support for meals, sanitation and camping sites may be required to complete the project. Project is remote with long travel periods. 	<ul style="list-style-type: none"> Project implementation requires a large logistical support operation. Separate logistical functions or a logistics team is required. Obtaining the necessary personnel requires at least some additional contacts and does require careful scheduling. Additional support will be needed for out-of-area personnel. Scarce supplies/equipment require extra lead time to procure. Support of meals, sanitation and camping sites are required in order to objectives. Remote locations difficult to access or inaccessible to vehicles.