



United States
Department of
Agriculture

Forest
Service

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National Forests

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Date: May 24, 2002

Subject: Clarification of Requirements

To: District Rangers
Attn: District Fire Management Officers

As fire season rapidly approaches I am requesting that each of you continue to provide strong visible leadership to our fire program activities. To this end, I want to ensure that there is clear understanding of the changes that have occurred this winter and the actions needed to implement these changes.

First let me address the use of the fire behavior card developed by Tom Lueschen outlining criteria for engagement and disengagement from fire suppression activities. This card was developed for indirect operations, not direct operations where there is an appropriate safety zone in the black immediately available. Training in the use of this card is available as audio powerpoint on the Fire Vision web site or by contracting with Tom Lueschen.

This year I want our fireline personnel to evaluate this system on as many fires as possible. I am asking the Entiat Interagency Hotshot Crew and our Helicopter management personnel (Rappellers) to evaluate it on every assignment, document their observations and management actions, and send copies of that documentation to both Tom Leuschen at FireVision, and to our Fire Management Officer, Elton Thomas. All other crews should send their documentation and observations to the same two individuals. I am asking our personnel to use the card both on and off Forest and to use it as a means to evaluate their compliance with our 10 standard orders and to effectively mitigate the 18 situations that shout watch out.

A second item I want to address is the requirement to view the Entrapment Avoidance information recently distributed to all Districts. The target audience is fire line decision makers such as Single Resource Boss, Task Force Leader or initial attack/extended attack Incident Commanders. However, all fire line qualified employees are required to attend. This must be completed prior to July First of this year. This is a requirement that is in addition to passing the Work Capacity Fitness Test at the arduous level and having attended an eight-hour fire refresher session that did not include an Entrapment Avoidance session. I encourage you to provide this training in a group setting to facilitate a healthy discussion, exchange of ideas and loading of RPDM- Recognition Primed Decision Making. Non-fire line qualified employees are also encouraged to attend.

The new S-130 fire school curriculum includes introductory Entrapment Avoidance training. New firefighters completing fire school this year will be receiving adequate entrapment avoidance training for their skill level.



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A third item that is causing considerable discussion is the implementation of work/rest guidelines. Let me start by reiterating that I expect us to manage all fire operations in compliance with the basic criteria outlined in the Fire Business Management Handbook. Specifically I expect that as a minimum our employees will take one full day off in fourteen or two full days off in Twenty-One when engaged in suppression activities. The second criteria, of meeting the Two to One work to rest guideline, must be followed. After the first operational period, any shift over 16 hours needs to be reviewed and approved by the Incident Commander. This narrows the area of management concern to the first operational period.

In the Forest Services response to the Occupational Safety and Health Administration (OSHA) after the Thirty Mile Tragedy, the first operational period was defined as the first 16 hours after initial action. This definition appears only in the response to OSHA. It does not appear in the letter of transmittal that accompanies this letter or in any of the clarifying communications that have been issued subsequently to the OSHA response.

Needless to say there continues to be a great deal of debate regarding how we are to manage our shift length during the first operational period. Until National or Regional direction becomes clear I am asking you to become personally involved in the management of these situations and to base your decisions regarding shift length on your evaluation of the risk to our employees, the public and the resources we manage.

/s/ Sonny J O'Neal

SONNY J. O'NEAL
Forest Supervisor

Enclosure