

**ARIZONA STATE FORESTRY DIVISION**  
**Policies and Procedures**

Subject: Fire Suppression and Prescribed Fire Policy

Issued: September 23, 2008

Effective: September 23, 2008

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**Purpose**

Effective immediately, the following attached procedures are in effect for the Fire Suppression and Prescribed Fire Policy.

**Authority**

Arizona Revised Statutes 37-623: Suppression of wildfires; powers and duties of State Forester; entry on private lands

- A. The State Forester shall have authority to prevent and suppress any wildfires on state and private lands located outside incorporated municipalities and, if subject to cooperative agreements, on other lands located in this state or in other states, Mexico or Canada. If there is no cooperative agreement, the State Forester may furnish wildfire suppression services on any lands in this state if the State Forester determines that suppression services are in the best interests of this state and are immediately necessary to protect state lands.
- C. The State Forester shall have responsibility to prevent and suppress wildfires only on lands covered by cooperative fire agreements.
- F. The State Forester may enter into cooperative agreements with other state and federal agencies, departments and political subdivisions and any person for: 1. Prevention and suppression of wildfires.
- G. The State Forester may enter private lands in performing the duties under this section.

**Discussion**

The vast majority of state lands (approximately 9,271,580 acres) are held in trust for 14 beneficiaries; primarily the common schools. Since its inception in 1915, the mission of the State Land Department has been to manage the Land Trust to maximize revenues for the beneficiaries. All uses of the land must benefit the Trust, a fact which distinguishes it from the way public lands may be managed.

Approximately 90% of the State Trust Lands are rural in character and leased for livestock grazing, agriculture, or mineral extraction. Wildfire suppression and the resulting costs, unless managed carefully, can greatly exceed the natural resource values at risk from wildfires. With minor exception, wildfires have little effect on the economic values of Trust Lands.

However, uncontrolled wildland fires on Trust Lands can pose a significant risk to neighboring lands and communities. Arizona's "Fire Environment" has changed dramatically in the last decade. Fundamental and uncontrollable changes have occurred in the fuels, weather, demographics, and firefighting capabilities of the federal firefighting agencies. Arizona's forests are in deplorable condition; characterized by wide-spread bark beetle epidemics and stands choked by millions of small trees. The prolonged drought is predicted to persist for decades more and its effects on fuels and fire behavior is profound. The state's explosive population growth is legendary and the construction of thousands of new homes in and adjacent to highly flammable wildlands is a modern fact of life in Arizona. The grounding of most of the federally

contracted large airtankers and the reduction in federal ground firefighting resources has significantly impacted the availability of effective and efficient initial attack resources.

The impacts of these uncontrollable changes on the number, nature, and consequences of wildfires in the state have been profound, as evidenced in every recent fire season. “Large” fires that once burn hundreds of acres have been supplanted with “mega-fires” that burn tens of thousands of acres - in a single afternoon. Fire potential indices set new record highs each year and the “worst case” scenarios are often exceeded. Ignoring wildland fires on or near State Trust Lands is not a viable management alternative.

## **Policy**

A Wildland Fire is any non-structure fire that occurs in the wildland. The State recognizes two distinct types of wildland fires: wildfire and prescribed fire.

A Wildfire is an unplanned and unwanted wildland fire, including those ignited by natural causes, unauthorized human-caused fires, escaped prescribed fire projects, and all other wildland fires where the objective is to put the fire out.

A Prescribed Fire is any planned fire, ignited either by management actions or natural causes that is managed to accomplish specific resource management objectives in a predefined designated area and within predetermined environmental parameters, as outlined in an approved prescribed fire plan.

1. Safety: Firefighter and public safety is the first priority. All fire management activities must reflect this commitment.
2. Fire Management: The full range of fire management activities will be used to hold wildfire losses on state lands to a level consistent with resource values at risk while providing adequate health and safety protection to the public and firefighters and with a minimum expenditure of state funds.
3. Response to Wildfire: Appropriate response to wildfires is based on environmental, social and legal considerations, and the likely consequences on firefighter and public safety and welfare, natural and cultural resources and the values to be protected, and the economic interests of the Land Trust and State Treasury.
4. Use of Wildfire: Wildfires will not be used to enhance natural resources. Wildfires will be controlled, contained, or confined at the least cost to the State, consistent with firefighter and public safety and welfare.
5. Protection Priorities: The protection of human life is the single, overriding suppression priority. Setting priorities among protecting human communities and community infrastructure, other property and improvements, and natural and cultural resources will be done based on the values to be protected, human health and safety, and the costs of protection. Once people have been committed to an incident, these human resources become the highest value to be protected.
6. Wildland Urban Interface: The operational roles of the State as partners in the wildland urban interface are wildland firefighting, hazard reduction, cooperative prevention and education, and technical assistance. Structural fire suppression is the responsibility of federal, tribal, or local governments. The State may assist with exterior structural fire protection activities under formal fire protection agreements that specify the mutual responsibilities of the partners.
7. Suppression: Wildfires are suppressed at minimum cost, considering firefighter and public safety, and all values to be protected, consistent with management objectives.

8. Prevention: The State will work with the federal wildland agencies and with local governments and partners and other affected groups and individuals to prevent unauthorized ignition of wildland fires.

9. Standardization: The State will implement training and qualification requirements, operational procedures and methodologies, and public education programs for all fire management activities that are compatible with the federal wildland agencies.

10. Interagency Cooperation: Fire management planning, preparedness, prevention, suppression, fire use, restoration and rehabilitation, monitoring, research, and education will be conducted on an interagency basis with the involvement of cooperators and partners.

11. Communication and Education: The State will enhance knowledge and understanding of wildland fire management policies and practices through internal and external communication and education programs. These programs will be continuously improved through the timely and effective exchange of information among all affected agencies and organizations.

## **Direction**

The following direction will guide the Forestry Division in the suppression of wildfires, the management of escaped fires and the use of prescribed fire in managing state land for their greatest economic return. It also provides direction in responding to private land wildfires outside incorporated municipalities, and in the wildland/urban interface.

## **Wildfire Suppression Strategies**

A wildfire is any unplanned, unwanted, wildland fire, including unauthorized human-caused fires, escaped prescribed fire projects, and all other wildland fires where the objective is to put the fire out.

Wildfire suppression can be any appropriate management response to wildfire, escaped or prescribed fire that results in curtailment of fire spread and eliminates all identified threats from the particular fire. The appropriate management response may range across a spectrum of tactical operations from monitoring to intensive management actions that are consistent with the policy. All wildland fire suppression activities must provide for firefighter and public safety as the highest consideration, and minimize loss of resource values, economic expenditures, and/or the use of critical firefighting resources.

In making decisions about how to organize and conduct suppression operations, District Foresters shall minimize both suppression costs and resource losses, consistent with the resource values to be protected, and shall consider fire behavior, the availability of suppression resources, the values of the natural resources and property at risk, and the potential cost of suppression.

The primary criteria for choosing fire suppression strategies and tactics are to ensure the safety of the public and firefighting resources while minimizing suppression costs, resource loss, environmental damage, and the threat of wildland fire escaping onto non-state lands.

Under no circumstances are suppression strategies and tactics to be tailored to achieve resource benefits. Even if resource benefits may result in some areas of the fire, do not spend suppression dollars with the objective of achieving resource benefits. Do not use unplanned wildland fires to achieve resource benefits. The selection of less aggressive containment strategies in areas of minimal potential negative impacts is appropriate if it is determined to be the safest and least-cost alternative.

Transition from initial attack to extended attack can be especially dangerous. During this transition, the fire shall be managed as a potentially life-threatening event. Identification of the fire behavior thresholds at which large fires typically occur is important because these thresholds indicate fire danger levels that compromise safety and control. When such thresholds are approached, fire program managers shall request additional supervisory and suppression support.

When a potentially life-threatening event exists, action shall be taken to provide for the safety of firefighters, other personnel, and the public, regardless of suppression costs or resource losses.

### **State Lands**

The initial suppression response on all reported wildfires on state lands will, at a minimum, consist of prompt size-up and assessment, through ground and/or aerial observation, unless some other form of appropriate suppression action has been pre-approved, in writing, by the State Forester. In such cases, the pre-approved appropriate suppression action will be initiated.

On each District, the District Forester, or their designated representative, will determine the appropriate actions on all state lands consistent with the size-up and assessment, and policies above. All initial attack will be planned in response to a wildfire's potential fire behavior and the typical response will be an aggressive suppression action, consistent with firefighter and public safety, and with values to be protected. The objective of initial attack is to stop the spread of the fire and put it out at least cost.

### **Private Lands Located Outside of Incorporated Municipalities**

There are approximately 12.8 million acres of private lands in Arizona located outside of incorporated municipalities. The State Forester has the authority to prevent and suppress any wildfires on state and private lands located outside incorporated municipalities. The State Forester may enter private lands, and may furnish wildfire suppression services on any lands in this state if the State Forester determines that suppression services are in the best interests of this state and are immediately necessary to protect state lands.

However, in the absence of a cooperative fire agreement, the following requirements must be met before the State Forester initiates fire control actions on private lands:

- The private lands must be located outside of an incorporated municipality, and
- The suppression services must be determined to be in the best interest of the state, or
- The suppression actions must be immediately necessary to protect state lands.

The State Forester's Office is not a state-wide fire department for all private landowners who might not be within an established fire district or who may not have contracted for private fire protection. The State Forester is only responsible to prevent and suppress wildfires on lands covered by cooperative fire agreements. The fire management objectives for all of the federal wildland agencies include the protection of "human life, property, and natural and cultural resources both within and adjacent to agency administered lands". The State Forester need not accept responsibilities for fires that threaten private lands when that responsibility has already been provided to the federal wildland agencies by federal statute, and consistent with the provisions of the January 2004 Joint Powers Agreement (AZ Agreement No. KR-04-0001-LNR-FIR).

However, most wildfires burning on private unincorporated lands are a potential threat to state lands and it is generally in the best interest of the State to suppress them as quickly and cheaply as possible. It is in the best interest of the State to control wildfires before they threaten or destroy critical community infrastructure (such as power lines, telecommunication sites, or highways and roads), or valuable natural resources (such as native

vegetation or municipal watersheds). Fires that are not self-contained by topography, discontinuous fuels, or favorable weather are likely to spread onto state lands, or lands for which the State is responsible under cooperative agreement, and appropriate suppression actions should be taken immediately to control them.

The initial suppression response on all reported wildfires on private lands located outside incorporated municipalities will consist of prompt size-up and assessment, through ground and/or aerial observation, and notification of any neighboring federal wildland agency. If prompt surveillance cannot be made, at least one wildland firefighting unit will be dispatched to the wildfire to evaluate the situation and take appropriate suppression action.

The State Forester may take appropriate suppression action on wildland fires on private lands when no other appropriate authority (federal wildland agency, local fire department or district, or private contractor) will respond, and there is a potential threat to life or property, or to the resource values on state lands or on the lands of others which are covered by a cooperative fire agreement signed by the State Forester. All initial attack will be planned in response to a wildfire's potential fire behavior, and the typical response will be an aggressive suppression action, consistent with firefighter and public safety, and with values to be protected. The objective of initial attack is to stop the spread of the fire and put it out at least cost

The State Forester may enter into wildland wildfire suppression cooperative agreements with federal and tribal agencies, and private land owners. (The State Forester will not enter into agreements for structural fire protection.) Such agreements will specify the appropriate suppression action, the level of protection to be provided and the fees to be paid for the service. The State Forester will not enter into such agreements in areas where local public or private fire departments provide such wildfire protection.

### **Private Lands with Local Fire Protection**

The State Forester is not responsible for fires burning within incorporated municipalities, nor within the boundaries of establish fire districts, nor contracted fire service areas. The State Forester will respond with available equipment and personnel and engage in fire suppression activities on lands under the cooperative agreement for prevention and suppression of wildfires, as set forth in each specific agreement. The State Forester will respond without a cooperative agreement, as requested by the responsible authority, with available equipment and personnel, but will seek full reimbursement from the responsible authority for fire suppression activities on private lands within incorporated municipalities, or within the boundaries of establish fire districts, or contracted fire service areas.

### **Federal and Tribal Lands**

The State Forester is not responsible for fires burning on lands managed by the Federal Government or Native American Tribes. The State Forester will respond with available equipment and personnel and engage in reimbursable fire suppression activities on lands under the jurisdiction of federal and tribal agencies at such time and as requested by the federal or tribal agencies, and as set forth in the 2004 Joint Powers Agreement.

### **Wildland Urban Interface**

The State Forester is responsible to assist in the prevention and suppression of wildfires on lands covered by cooperative fire agreements. The State Forester maintains cooperative fire agreements with more than 250 local fire departments and fire districts.

The objectives of wildland urban interface fire management are, in cooperation with our federal and local partners, to:

1. Facilitate interagency fire prevention and protection to minimize fire loss and fire damage to life, structures, other human development, and wildland resources.

2. Assist property owners to take an active role in establishing and maintaining their own fire prevention and safety measures in the wildland urban interface.

3. Work closely with local communities in assessing risk and developing strategies to mitigate this risk in wildland urban interface.

Structural fire suppression is the responsibility of federal, tribal, or local governments. The state may assist with exterior structural fire protection activities on private lands under a cooperative fire agreement.

The State Forester may provide technical and financial assistance to tribal, and local cooperators for fire management planning and activities in the wildland urban interface through the following cooperative fire protection programs:

1. Federal Excess Property Program, where Federal equipment is loaned to local fire departments.

2. Rural and Volunteer Fire Assistance cost-share grant programs to train, equip, and help organize local fire departments.

3. State Fire Assistance and State Fire Hazard Abatement cost-share grant programs to improve upon basic fire protection programs in rural communities and reduce fire fuels in the interface.

The State Forester may collaborate with federal, tribal, county and local government entities to:

1. Establish and keep up-to-date cooperative agreements that recognize jurisdictional protection responsibilities and assistance capabilities of the respective cooperators.

2. Educate wildland firefighters about safe operational procedures in the wildland urban interface, and provide training in safe wildland firefighting operations for structural firefighters who respond to wildland urban interface fires.

3. Provide public education on fire risks and hazards and fire prevention responsibilities and actions to minimize losses and damage to structures and lands in the wildland urban interface.

4. Assess, analyze, and plan for fire prevention and protection in conjunction with other federal, tribal, state, county and local government entities and with community and citizen groups.

5. Encourage and participate in cooperative relationships with citizen or community centered approaches to manage fire risks and hazards in wildland urban interface areas.

6. Implement fuel modification projects to mitigate fire hazards.

## **Prescribed Fires**

Fire is an essential ecological process in many ecosystems. Prescribed fire can be used to alter, maintain or restore vegetative communities, improve the future conditions of many sites, and to protect life, property, and natural resource values that could be degraded by wildland fire. Prescribed fire can be accomplished through management or natural ignitions, but only after approval of appropriate burn plans.

Prescribed Fire is the thoughtful application of fire, under specified conditions, in a designated area, to achieve specific land management objectives. Prescribed Fire is any fire ignited naturally or by management action that meets specific objectives. A written and approved prescribed fire plan must exist prior to ignition of any kind. All prescribed burn plans will contain measurable objectives, a predetermined prescription, and a contingency plan to be implemented in the event the fire escapes.

The State Forester can contract to conduct all or part of a prescribed fire operation and/or all or part of mechanical treatments for "Hazard Fuel Reduction" projects. If a contractor is actively involved in igniting, holding or mopping up a state prescribed fire, a Contracting Officers Authorized Representative (COAR) or Project Inspector (PI) will be on the site (exceptions can be made for late stage mop up and patrol) to ensure that the burn objectives are being met and that the terms of the contract are adhered to. The State Forester's representative (COAR or PI) must have prescribed fire and/or wildfire qualifications equal to what the state would require if a state employed Prescribed Fire Burn Boss were conducting the actual operations.

### **Prescribed Fire Planning**

The Prescribed Fire Plan serves as the project implementation document for an individual prescribed fire project. The Prescribed Fire Plan is a stand alone document that provides the Prescribed Fire Burn Boss all the information needed to implement the project. Prescribed fire projects will be implemented in compliance with the written plan, and all use of prescribed fire will support State Land Department resource management goals and plans.

The following items should be considered in all burn plans:

Plan Approval, Ignition & Holding, Organization, Cost, Contingency Plan, Safety Briefing, Public Safety, Job Hazard Analysis, Go/No Go Checklist, Test Fire, Medical Plan, Communications Plan  
Prescribed Fire Report, Technical Review, Complexity Rating, Risk Assessment, Physical Description, Map, Management Objectives, Notifications, Prescription, Fire Behavior Calculations, Smoke Management

The size and complexity of the prescribed fire project will determine which sections are appropriate and the level of detail required.

There needs to be a clear understanding between management and the prescribed fire burn boss as to which parts of the prescribed fire plan (if any) may be changed on the site prior to implementing the project. This information may be included in the plan or it may be established as local policy.

### **Prescribed Fire Go – No Go Documentation**

The Agency Administrator's Go/No-Go Pre-Ignition Approval is the intermediate planning review process (i.e., between the Prescribed Fire Complexity Rating System Guide and Go/No-Go Checklist) that should be completed before a prescribed fire can be implemented. The Agency Administrator's Go/No-Go Pre-Ignition Approval evaluates whether compliance requirements, prescribed fire plan elements, and internal and external notifications have been completed and expresses the Agency Administrator's intent to implement the prescribed fire plan. If ignition of the prescribed fire is not initiated prior to expiration date determined by the Agency Administrator, a new approval will be required. The state will use the NWCG approved Agency

Administrator's Go/No-Go Pre-Ignition Approval form (PMS 422) and the Prescribed Fire Go/No-Go Checklist (PMS 421).

### **Prescribed Fire Restrictions**

Implementation of Prescribed Fires at National Preparedness Levels IV and V is restricted. (See the Southwest Area and National Mobilization Guides.) At National Preparedness Level IV or V concurrence by the State Fire Management Officer (SFMO) must be obtained before implementing the recommendation for a prescribed fire. An evaluation of significant risk will be made by the SFMO, or his designated representative, and a presentation of the prescribed fire implementation proposal will be made to the Southwest Fire Management Board prior to the approval of the prescribed fire. A coordination/tracking function will be established to track prescribed fires and resource commitments at Southwest Interagency Coordination Center and National coordination levels.

### **Prescribed Fire Complexity Rating**

A complexity rating will be completed for each prescribed fire project (see the NWCG Prescribed Fire Complexity Rating System Guide - PMS 424/ NFES 2472). The determination of prescribed fire complexity will be based on an assessment of risk (the probability or likelihood of an unplanned event or situation occurring), the potential consequences (some measure of the cost or result of an undesirable event or situation occurring), and the technical difficulty (the level of skills needed to complete the project and deal with unplanned events).

The complexity rating will consider the potential social, political, economic, biological, environmental, and legal consequences of implementing the project. Use the complexity rating to guide staffing levels, determine skill and experience requirements, and to determine the level of detail needed in the prescribed fire plan.

The Prescribed Fire Complexity System does not tie directly to the Prescribed Fire Qualifications System. The following guidance will apply. All prescribed fire projects rated as complex will require a Prescribed Fire Burn Boss rated as RXB1 and an Ignition Specialist rated as RXII.

### **Prescribed Fire Smoke Management**

Personnel developing Prescribed Fire Plans must be aware of state and local regulations, and the potential impacts that a specific project may have on critical or smoke-sensitive areas, such as Class I air sheds, restricted areas, and designated areas (often called non-attainment areas). Equally important are local features that could be impacted such as highways, airports, recreation sites and smaller population centers. Prescribed Fire Plans need to identify critical and/or smoke-sensitive areas and provide operational guidance to minimize the impacts from smoke. If potential negative impacts from smoke could occur, an assessment of potential down wind impacts using an appropriate smoke management model must be completed. The Arizona Department of Environmental Quality requires smoke dispersion modeling be completed before they will issue a permit for a prescribed fire project.

### **Prescribed Fire Cooperation and Assistance**

District Foresters are encouraged to enter into agreements for the cooperative use of prescribed fire resources. Joint prescribed fire management programs are encouraged to accomplish resource or landscape management objectives when consistent with the state agency's management plans. These partnerships are encouraged at both the programmatic and project levels to implement prescribed fire projects.

Any prescribed fire that involves State Land Department employees or equipment will be supported by a Prescribed Fire Plan. The State Forester may provide reimbursable assistance for prescribed fires that will be conducted on lands administered by other state agencies, other states or tribes, or federal agencies. The “Joint Powers Agreement” for coordinated fire management in Arizona, provides for interagency assistance. Such projects will be conducted through specially developed agreements which document the purpose of the project, objectives, agencies participating in the project, the role of each agency, and each agency’s share of the project costs. Coordination with other agencies will occur in the planning phase for joint prescribed fire projects.

The State Forester may enter into agreements for prescribed fire projects with private parties on intermingled lands when the Department’s objectives can best be met through this approach. The agreements must specify the exact lands involved, the purpose of the project, objectives, parties participating in the project, the role of each party, and each party’s share of the project costs the overall objectives. In most cases the private land owner must fund a proportional share of the project cost. However, this does not necessarily need to be a monetary exchange. The private land owner(s) may provide in-kind services (e.g., line construction), equipment (e.g., engines, water tenders or dozers), supplies (e.g., fuel), or personnel to fulfill their part of the financial obligation.

There may be occasions where a private land owner would allow the State Forester to burn their private land to facilitate a state agency project. In such cases where there is a clear benefit to the state agency and not to the private landowner, asking the private landowner to pay a share of the cost would not be appropriate and is not required.

### **Escaped Prescribed Fires**

A Prescribed Fire becomes a wildland fire when the Prescribed Fire Burn Boss determines that an escape has, or is likely to occur, or environmental conditions and/or fire behavior exceeds the parameters in the prescribed fire plan and as such, the fire is no longer meeting the identified management objectives. Fire outside of the planned perimeter that cannot be contained with the holding forces identified in the prescribed fire plan is an escape and will be declared a wildland fire.

When a prescribed fire is declared a wildland fire, managers have the full range of suppression options available under the policy. If a prescribed fire is declared a wildfire a “Fire Number” will be assigned and all suppression costs will be charged to the Suppression Fund.

The following actions will be taken on all prescribed fires that are declared wildland fires:

1. Take prompt and reasonable action to control and suppress the fire. This could include the development of a “Wildland Fire Situation Analysis.”
2. Notify the State Fire Management Officer and District Forester.
3. Notify the other Agency Administrator(s), and/or other land owners that may be affected by the escaped fire. Coordinate suppression actions with the other affected parties.
4. Document the time and environmental conditions that existed when the escape occurred.
5. Document the incident, including all actions prior to and after the escape. Set up a file that includes all pertinent information, i.e., the prescribed fire plan, a chronology of events including the prescribed fire report and unit logs or individual statements, the fire investigation report, weather forecasts including any

spot forecasts, Remote Automated Weather Station (RAWS) data and National Fire Danger Rating System (NFDRS) data for the day of the escape for the nearest weather stations, photos, and any appraisal of damages.

All escaped prescribed fires will receive an administrative review. The level and scope of the review will be determined by the injuries, damages, and costs associated with the escape.

When a prescribed fire crosses the predetermined project area or fireline, but can be contained with the planned resources on-site, it can be considered a “slopover”, and not necessarily an escaped fire. Project funds, and not the suppression fund, will be charged to control a “slopover”.

### **Escaped Fires**

Wildfires and prescribed fires which are expected to exceed initial attack capabilities or prescription, or burn into the next burning period (10:00 a.m. to sundown) will be considered an escaped fires. All escaped fires will have an Escaped Fire Situation Analysis completed by the responsible District Forester, or their designated representative (see attached form).

The District Forester shall promptly organize and activate sufficient resources to implement an appropriate suppression action for each escaped fire. Such action will be consistent with the fire suppression direction for the area and the decisions approved in the Escaped Fire Situation Analysis. The Escaped Fire Situation Analysis will be reviewed daily and update as necessary.