

UNITED STATES DEPARTMENT OF THE INTERIOR

BUREAU OF LAND MANAGEMENT

Office of Fire and Aviation  
3833 South Development Avenue  
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Instruction Memorandum No. OF&A 99-008  
Expires: 9/30/2000

To: All Field Officials  
From: Director, Office of Fire and Aviation  
Subject: Hazardous Fuel Reduction - Fund Code Guidance

In November 1998, IB No. OF&A 99-010, titled "Bureau Fuels Management Program Review for 2823 Subactivity," was issued. The field interviews and the resulting findings and recommendations were completed in early March of this year. The five review teams each sent representatives, composed of the following employees, to meet and consolidate their findings and recommendations: Andy Smith, California Budget; John Vest, National Business Center; John Shive, Utah Fire Management; Dave Burley, Idaho Budget; Al Carriere, Office of Fire and Aviation Fuels Manager; Phil Range, Office of Fire and Aviation Fuels Manager; and Gardner Ferry, Office of Fire and Aviation Budget.

The Task Group found no waste, fraud and abuse of allocated fuels management funds (2823). Considering this was the first year of this new source of appropriated funds and guidance evolved throughout the year as we learned from experience, the teams were pleased to report so many positive findings. The teams specifically noted how rapidly most states and offices organized and developed a program to effectively achieve sizeable increases in accomplishments while maintaining a cost efficient basis.

There were 24 specific findings, most of which focused on the three objectives of the program review. These objectives were as follows:

How were the funds spent and was the fund code guidance adequate?

Was the process to establish targets and to coordinate development and implementation activities effective?

Was there adequate documentation of accomplishments?

There were also valuable findings not directly related to the objectives of the review. These findings, along with findings on the process and documentation, will be incorporated into the new *Fuels Management Handbook* to be issued in the first quarter of the next fiscal year. The items not directly related to the objectives of the review were smoke management, escaped prescribed fire review process, qualification needs for fuels management positions, red card qualifications, and prescribed fire plans.

Regardless of the category of findings, most recommendations centered on the need for further clarification of existing guidance and for consolidating all of the guidance and consistently presenting it in the respective documents, as opposed to memorandums and electronic messages. The new *Fuels Management Handbook*, the annual *Fund Coding Handbook*, and the BLM's *Standards for Fire Operations* (Redbook) will be the reference sources for this guidance.

The direction provided in this memorandum's attachment takes effect immediately. We are only providing the fund code direction at this time. It is critical to have this guidance for the 1999 field season; the revised guidance has already undergone significant review, and there is very little change in policy with most changes focusing on clarification.

We wish to thank all of the people who participated in this review, both from the field and the review teams. We believe that by adhering to this guidance and the guidance in the soon to be issued handbook, we can be more effective and efficient and receive an unqualified opinion if audited.

If you have any fuels management questions or comments, please address them to the following employees: Gardner Ferry, Fiscal Activities (208-387-5161); Phil Range (208-387-5555) and Al Carriere (208-387-5168), Operational Issues and general fuels program management activities; Tina Vorbeck, Reporting Process and System (208-387-5417); Rick Jensen, Qualification System (Red Cards) (208-387-5710).

Signed by:  
Lester K. Rosenkrance  
Director, Office of Fire and Aviation

Authenticated by:  
Pat Lewis  
Supervisory Mgmt. Asst.

## **Fund Code Guidance**

### **Hazardous Fuel Reduction Operations Subactivity (2823)**

This subactivity is commonly referred to as the Fuels Management Program. The Congressional intent of this funding source is to focus on implementation. The Fuels Management subactivity requires the use of a project number with all expenditures. The subactivity has been organized into two Program Elements (reference *1999 Fund Coding Handbook*). Program Element "00" is used with all costs associated with a specific project. Program Element "01" is used with costs associated with general fuels program activities not tied to a specific project, such as training and program management, and involves the use of "YY99" as the standard project number. The term "Program Support" is commonly used to identify activities associated with Program Element "01."

#### **Uses of Funds:**

Includes the costs of implementing prescribed fire, mechanical, and chemical treatments to reduce hazardous fuels and to restore fire to its natural role in ecosystems.

Includes mechanical and chemical treatments necessary to alter fuels as a precursor to the introduction of fire in its natural role.

Includes the costs of construction and maintenance of fuel breaks that are part of a scientifically planned, NEPA compliant network of strategically located linear connected areas where fuel characteristics are modified to break up continuity of hazardous fuels. To develop a network of connected areas, cooperative agreements with partners may be necessary.

Includes funding of prescribed fire, mechanical and chemical treatments to remove undesirable vegetation as the first step in ecosystem restoration, *but excludes* subsequent mechanical and chemical treatments, plantings, and seedings to establish the desired vegetation.

Excludes treatment of fuels generated in conjunction with commodity production activities, such as timber stand improvement and slash.

Excludes type conversions where the principal purpose is for commodity production.

Excludes annual maintenance of landscaping, transportation corridors, and right-of-ways.

#### **Labor Costs:**

Includes regular planned salaries for all fuels management permanent full time personnel who are dedicated for the full year to non-commodity production fuels management activities. Includes shared positions with other agencies. Permanent full time fuels or forest management personnel that also have responsibility for treatment of fuels associated with commodity production must pro-rate their salary.

Includes salaries for career seasonal and seasonal personnel hired specifically for fuels management project implementation.

Includes salary for hours worked by qualified non-fuels management personnel with responsibility for developing project burn plan(s). Does not include salary for non-fuels management personnel performing (fire or non-fire) program-wide planning activities which address general fuels management activities. For example, the office's Range Specialist has been integrally involved in the prescribed fire program, is qualified, and has shared or been the lead in developing burn plans and will continue to do so regardless of whether they benefit the range management program. The employee's salary for the hours worked can be charged to the project.

Includes salaries for the hours actually worked on implementation for all non-fuels management personnel (fire or non-fire) that are a formal part of the unit's prescribed burn implementation team. For example, the office's Wildlife Biologist is a qualified ignition specialist and is used on all prescribed burns on and off the district land regardless of wildlife program benefits. The employee's salary for the hours worked implementing the project can be charged to the project.

Includes costs of project development and clearances for permanent full time support personnel (such as archeologist, environmental compliance specialist, and T&E Biologist) that do not have regular planned base salaries and are funded on a project-by-project basis. Funding is only for the hours worked on a project when their discipline is not a benefitting activity. Also includes the costs for these same activities if they are performed by qualified temporary hires and contracted specialists. For example, the office's archeologist, if funded on a project-by-project basis, or a contract archeologist, can charge salary for the time worked on the project. Funding should only be for the level of work needed to perform the basic task(s) meeting compliance requirements commensurate with the anticipated disturbance.

Includes overtime and premium pay for all personnel, fire and non-fire, permanent, career seasonal or seasonal, while actually involved in project implementation.

Excludes regular planned salaries for all fire and non-fire permanent full time personnel, other than permanent full time fuels management personnel and forest management personnel that also have responsibility for treatment of non-commodity fuels, or as previously described have lead roles in burn plan development or are formal members of the prescribed fire team. Fuels management funds (2823) for non-fuels personnel performing covered roles as previously described are not spread to the respective disciplines to be used as base funding. These employees only charge to the specific project as the work is performed. Career seasonal and seasonal personnel hired under another fire subactivity or a non-fire appropriation, may not charge their base salary to the hazardous fuel reduction operations subactivity. However, career seasonal and seasonal employees' appointments may be extended under the hazardous fuel reduction operations authority when dedicated to fuels project development and implementation, regardless of the original purpose of hire. Seasonals cannot be extended beyond the annual 1039 hour limitation.

Excludes all costs associated with general land management planning such as ecosystem plans, land management plans (RMP's), and program management plans (e.g., AMP's, HMP's, and FMP's). Program support fuels management personnel assigned to general land management planning activities would continue to code labor costs to their base-8 (2823) subactivity. For example, a fire manager working on an RMP or FMP would code all of their regular planned salary (base-8) to the 2810 subactivity, even if the work addresses fuels management, such as prescribed fire. A forester working on a RMP or an activity management plan would code to their regular planned subactivity for all labor costs, even if they address fire and fuels, which they should be doing to consider ecological disturbances.

Excludes all costs of managerial oversight which is normally funded through general administrative or non-fire program management funds. Fire program managers, such as State, District, and Field Office Fire Management Officers (FMO's), should code to the Preparedness activity which covers general fire program management and readiness.

**Travel and Per Diem Costs:**

Includes travel and per diem for all personnel involved with project implementation activities. These costs would be part of project implementation and coding would use the program element of "00" along with the specific project number.

Includes travel and per diem for all approved personnel associated with developing, managing, and attending fuels management training and workshops as well as National Wildfire Coordinating Group's (NWCG) certified prescribed fire curriculum. These costs would be part of the office's fuels management program support and would use the program element of "01" and the "YY99" project number.

**Administrative Support Costs:**

Includes administrative support cost, but can only be assessed at the organization level directly responsible for implementing fuels management activities. This fee cannot exceed five (5) percent of the Field Office's target allocation. Subactivity 0777 (general purpose, non-program specific support costs) cannot be assessed to the fuels management program.

**Aircraft Costs:**

Includes flight time associated with hours actually worked on a project. Usually Call-When-Needed aircraft are more economical for fuels management activities than extending Preparedness (2810) contract aircraft and paying for both the availability and flight time. There may be exceptions, so an analysis should be performed to determine the most economical method before extending the length of an aircraft contract.

**Public Awareness Costs:**

Includes the cost of public awareness activities for specific projects.

Excludes cost associated with general fire education/awareness activities and general information about the use of fire or other generic fuels management activities.

Attachment 1-3

**Monitoring and Analysis Costs:**

Includes costs for establishing plots for monitoring fire behavior, fuel moisture, and direct effects of the fire treatment, and immediate post-treatment monitoring of these plots. Long-term effects monitoring and analysis should be funded by the activities with responsibility for management of the vegetation.

**Contracting:**

Includes all costs associated with contracting. Contracts can be used for all, or portions of, project development and implementation.

**Equipment Purchases:**

Includes purchase of capitalized equipment needed for the average annual workload that cannot be economically contracted, leased, or rented. Capitalized equipment is identified as acquisition costs equal to or greater than \$10,000. Before the standard procurement process is initiated, the proposed purchase must be supported by an analysis of cost alternatives and submitted with a request to authorize the purchase to the State FMO. Purchases should always consider cost sharing with other activities and/or statewide sharing. Heavy equipment, including vehicles, tractors and other mechanized equipment, should not be purchased. The purchase price of this category of items can be misleading as it only represents a portion of the total long term indirect costs, such as maintenance, operations, training, storage, and liability.

Includes the cost of replacing equipment destroyed while being used on a fuels management project and will require a Board of Survey action.

**Miscellaneous Costs:**

Includes costs of moving fuels management personnel (PCS moves).

Includes costs of procuring supplies and office equipment for permanent fuels management personnel.

Includes costs of all supplies directly related with project development and implementation.

Includes leave surcharge, which is covered at the national level.

**Interagency Fuels Management Activities:**

The process the Bureau follows for interagency fuels management activities is similar to the process BLM follows for assistance on wildland fires . The Bureau fully endorses the concept of interagency support and recognizes that well planned and managed interagency activities should benefit all parties. Unlike emergency suppression activities, no office is obligated to provide fuels management assistance if it conflicts with BLM workload priorities and jeopardizes achieving BLM's performance measures.

1. All BLM interagency fuels management activities (prescribed fire, mechanical, chemical) involving 2823 funding must have the following:

- **An assigned fuels management project number that is unique to that project**, not one number for all interagency activities or one number for each agency. Use a project number from the list of numbers assigned to each Bureau Field Office. The list of project numbers assigned to offices can be found in the Appendix of the Handbook providing guidance on how to complete a wildland fire. The project number enables financial tracking and the documentation of the project in the Fire Reporting System.
- **Documentation of each project in the Bureau's Fire Reporting System.** The local BLM office that assigns the fuels project number is responsible for filing the Fire Report for the project as long as that assistance number is used by any BLM office. The assistance Fire Report is easy to complete and requires no specific knowledge of the project or BLM's costs.

2. The 1999 Amendment to the master "Interagency Agreement for Fire Management," which covers the BLM, BIA, FWS, NPS and the USFS, addresses several items among which is reimbursement for fuels management activities. Section V, G, item 7, states as follows:

*The Interior agencies have agreed to not reimburse for services rendered to one another under the Hazardous Fuel Reduction Operations program. Potential deficiencies in individual agency's Operations accounts due to assistance rendered will be covered by funding transfers following normal Department protocols. The Interior bureaus and the Forest Service also agree to not reimburse each other for Hazardous Fuel Reduction Operations assistance except for extraordinary situations in which there is no opportunity for reciprocal services to achieve performance targets. Reimbursement is acceptable only when the amount to be reimbursed represents a significant portion (greater than ten percent) of the office's allocation.*

The phrase "ten percent of the office's allocation" only applies to the U.S. Forest Service since the Interior agencies, through the "Master Interagency Agreement" amendment and previous documents, have already agreed to not reimburse for any services regardless of cost. The reimbursement phrase refers to that portion of work beyond what has been off-set through reciprocal services. It should also be noted that national caches run by the Forest Service have no allocated fuels funds. Therefore, they may choose to bill for all fuels management orders as they currently can for non-suppression activities. In keeping with the intent of minimizing administrative costs, BLM offices should work with their Geographic Area's national cache. If managed by the Forest Service, see if an arrangement can be made, such as picking up the order as opposed to having it shipped, to eliminate billing. In general, the most efficient method of obtaining supplies for fuels activities is to work directly with our local interagency neighbors.

3. When another Federal agency requests BLM's assistance on a fuels management project, the request should go to the local BLM Field Office. The local BLM office assigns a fuels management project number and that will be the only BLM number issued for that project regardless of where the BLM assistance is obtained. If the local BLM office provides all of the requested assistance, all activities are handled strictly between the two interagency neighbors. If only some, or no, local BLM assistance can be provided, it is the responsibility of the requesting agency to decide if they want to continue to seek assistance from more distant sources. If BLM assistance is obtained from other sources, usually through the normal Resource Ordering process (similar to wildland fires), the original BLM project number assigned is the only one used. The Bureau's fuels project number is only used to cover BLM costs. Each BLM office responding uses their own office designation code (such as OR-010) with the 2823 subactivity code, the program element of "00," and the assigned project number given by the local BLM office. All costs of interagency assistance will not be considered part of any office's fuels management allocation. By having a unique project number and the Fire Report, these costs can be tracked at the national level. Budget adjustments among the agencies can be made if necessary. For example, a Field Office has been allocated \$100,000 fuels funds (2823) to meet their program support and project implementation costs to accomplish that year's planned fuels management workload. If the office uses all of this allocation on their projects, plus an additional \$8,000 for documented interagency assistance, they will not be considered over expended for the additional \$8,000. Because of the complexity that interagency assistance introduces into fund management, every office must promptly and accurately document their expenditures and activities.

For those infrequent situations when an interagency partner does not request BLM for local services and only wants to get radios from the national cache (which BLM manages) or supplies from the Great Basin national cache (which BLM manages), a unique fuels management number for each agency has been established at the National Interagency Coordination Center (NICC). This number will only be used by NICC for national cache items when no BLM Field Office number has been assigned.

4. Interagency assistance activities should not be used to expand BLM's workforce numbers or extend the length of BLM's workforce season more than one full pay period. The Bureau is still accountable to the 1,039 hour length-of-season limitation on seasonal employees. Assistance workloads must not be part of any consideration to convert seasonals to career seasonal (WAE's) or career seasonals to permanent full time. Interagency assistance will also not be considered when assessing the local workload for the purpose of establishing a permanent full time fuels management position.