

NPS Director's Order #41: Wilderness Stewardship

6.7 Fire Management

Firefighter and public safety are the first priority in every fire management activity. However, wilderness character must be fully considered during all fire management actions beginning with the development of the Fire Management Plan (FMP) and continuing through the management of individual wildfires and implementation of fuel treatments and post-fire actions. A FMP is required for each park with burnable vegetation. It defines objectives, management requirements, ecological considerations and potential strategies and tactics for safely managing fire in order to meet overall land management and wilderness objectives. The FMP considers values that require protection from fire (e.g., structures, cultural resources, and other values) as well as those that may benefit from fire within and outside of wilderness.

In many NPS wilderness areas fires resulting from natural ignitions are considered a natural process that contributes to ecosystem function and is necessary to maintain wilderness in an unimpaired condition. As a result of many factors including past fire management practices within wilderness and the need to control wildfires on adjacent lands, fire may not be adequately functioning as a natural change agent. In those cases, augmenting natural ignitions with prescribed fire or other fuel treatments within wilderness may be necessary to restore or maintain ecological function if that is a goal identified in the park's Wilderness Stewardship Plan or FMP.

To ensure adequate consideration of wilderness resources, a programmatic minimum requirement analysis (MRA) must be completed as part of the development of the park's FMP and companion environmental compliance document. The programmatic MRA must address management strategies for wildfires and fuel treatments in wilderness. The programmatic statement will establish the need for potential fire management actions in wilderness and will provide guidance for implementing initial wildfire responses. The analysis should specify the minimum activities (strategies, methods, and tools) that are generally permitted for managing wildfires, implementing fuels treatments, and conducting post-fire activities. For management of long-duration wildfires an incident specific minimum requirements analysis should be considered to evaluate the methods and tools being applied to manage the event. The analysis should be periodically reviewed throughout the incident to ensure that appropriate strategies, methods and tools are being used to protect wilderness character.

A MRA must also be developed as part of a Burned Area Emergency Response (BAER) plan for actions in wilderness that are proposed to restore, stabilize, or rehabilitate an area following a wildfire.

Project plans for fuels treatments in wilderness must address the minimum requirement. Project plans should refer to the programmatic MRA developed for the FMP that establishes the necessity for such treatments. If the proposed treatment is confirmed to

be within the framework of the programmatic MRA, the project plan is not required to revisit that decision. However, each project plan must contain an analysis of the minimum methods and techniques necessary to accomplish the specific action with the least negative impact to wilderness character.

The application of Minimum Impact Strategies and Tactics (MIST) is required for all fires in wilderness. Qualified wildland fire Resource Advisors should be utilized throughout wildfire incidents, and post-fire activities including emergency stabilization and Burned Area Emergency Response (BAER). Resource advisors must be knowledgeable about wilderness values, objectives, and policies.

A delegation of authority from the park superintendent to an Incident Commander will include appropriate emphasis on the protection of wilderness resources and character, and the minimum requirements concept. Fire management resources must be adequately briefed on the concepts of wilderness stewardship and held accountable for preservation of wilderness character. They must be made aware of specific protections and constraints contained in the park's Wilderness Stewardship Plan and FMP.

Parks lacking an approved FMP must suppress all wildfires in a method that is commensurate with values to be protected and with consideration for the principles of risk management. While parks lacking an approved FMP may not use resource objectives as a primary consideration when selecting a suppression strategy for a wildfire, the impacts of suppression alternatives on wilderness character and other resource values must be considered when response strategies are developed and decisions are approved. Parks lacking an approved FMP may not implement prescribed fire projects. Also see *Management Policies 2006*, [Section 6.3.9](#) and [Director's Order #18: Wildland Fire Management](#).