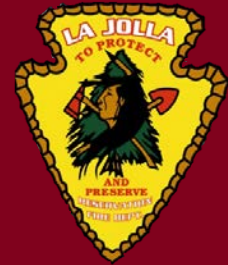


Draft Version 11-3-25

2025

La Jolla Reservation Wildland Fire Management Plan



La Jolla Reservation Fire
Department
La Jolla Band of Luiseño Indians
22000 Highway 76
Pauma Valley, CA 92061

November 3, 2025

Within Bureau of Indian Affairs
Pacific Region Division of
Forestry and Fire Management
2800 Cottage Way
Sacramento, CA 95814

Summary: Wildland Fire Management Plan (WFMP)

La Jolla Band of Luiseño Indians

The La Jolla Band of Luiseño Indians' Wildland Fire Management Plan (WFMP) is a comprehensive strategy to protect life, property, and natural and cultural resources from the increasing threat of wildfire. Driven by climate change, historical fire suppression, and development in the Wildland-Urban Interface (WUI), the plan's core strategies are to **reduce hazardous fuels, improve preparedness, and build fire-adapted communities**. The plan is guided by Tribal goals, federal policy (BIA Red Book), and a deep respect for **Traditional Ecological Knowledge (TEK)**, prioritizing the restoration of cultural burning practices.

How the Land is Managed

The plan divides the Reservation into three distinct Fire Management Units (FMUs):

1. **Asset Protection Unit (APU):** The WUI, or residential areas, where the primary goal is **aggressive suppression** of all fires.
2. **Resource Management Unit (RMU):** Areas where the goal is to **balance resource protection** with the managed use of fire for ecological benefit.
3. **Wildland Management Unit (WMU):** Remote areas where wildland fire can be **strategically used** to enhance natural and cultural resources.

Key Program Components

The WFMP outlines several key programs. A proactive **Fuels Management** program reduces hazardous fuels, prioritizing the WUI. A **Fire Prevention & Education** program aims to reduce human-caused ignitions through community engagement (like Firewise USA®) and regulation. The plan also establishes formal protocols for **Arson Investigation** and ensures all fire personnel meet **National Wildfire Coordinating Group (NWCG)** standards for training, safety, and interagency operations. Operationally, the plan is guided by a detailed **Annual Operating Plan (AOP)** and follows federal guidelines for post-fire recovery.

Burn Permit System

A central component of the plan is the formal Burn Permit System, which prohibits all open burning unless authorized. This system enacts clear procedures for the La Jolla Reservation Fire Department (LJRFD) to manage risk from residential debris piles, agricultural burns, and campfires, all of which require a formal application, site inspection, and permit.

Crucially, the plan is designed to **remove barriers for traditional practices by exempting cultural and ceremonial burns from the formal permit process**. Instead, Tribal members coordinate directly with the LJRFD, which then manages all safety planning and provides resources. For all permit holders, adherence to safety rules—including the critical step of **calling the LJRFD for daily ignition approval** before any burn—is mandatory and enforced to prevent escaped fires.

Date

Mr. Ryan Hunter Acting Regional Director Pacific Region U.S. Bureau of Indian Affairs 2800 Cottage Way,
Room W-2820 Sacramento, CA 95825

RE: Transmittal for Review and Approval: La Jolla Wildland Fire Management Plan

Dear Mr. Hunter,

Please find attached the La Jolla Wildland Fire Management Plan (WFMP) for your thorough review and official approval. This comprehensive plan has been developed through a collaborative and inclusive process involving the La Jolla community, the Tribal Council, and the La Jolla Reservation Fire Department, with the invaluable support and guidance of the Bureau of Indian Affairs.

Upon your approval, this critical WFMP will be formally integrated into the draft La Jolla Integrated Resource Management Plan (IRMP), ensuring a cohesive and unified approach to the management of our Tribal lands and resources. We sincerely welcome any comments, suggestions, or recommendations you may have as part of your review process, as your expertise is highly valued.

Thank you for the Bureau's continued and invaluable support throughout the development of this essential plan, which is vital for the safety and well-being of our community and the protection of our precious natural and cultural resources. We look forward to receiving your feedback and approval.

Sincerely,

Wesley Ruise Jr. Tribal Chairman La Jolla Band of Luiseño Indians

Enclosure: La Jolla Wildland Fire Management Plan

Resolution Number: _____, 2025

A RESOLUTION APPROVING THE WILDLAND FIRE MANAGEMENT PLAN FOR THE LA JOLLA BAND OF LUISEÑO INDIANS

WHEREAS, the La Jolla Band of Luiseño Indians is a federally recognized Tribal government by the United States of America and is one of the Luiseño Tribal governments located in San Diego and Riverside Counties; and

WHEREAS, the La Jolla Band of Luiseño Indians is recognized by the Federal Government of the United States of America, with the General Council serving as its governing body; and

WHEREAS, Article 3, Powers of the General Council, of the Constitution of the La Jolla Band of Luiseño Indians authorizes the General Council to implement all ordinances, resolutions, or other enactments of the Tribe; and

WHEREAS, Article 6, Powers of the Tribal Council, of the Constitution of the La Jolla Band of Luiseño Indians authorizes the La Jolla Tribal Council to implement all ordinances, resolutions, or other enactments of the General Council; and

WHEREAS, pursuant to the Constitution of the La Jolla Band of Luiseño Indians, dated September 7, 1995, the La Jolla Tribal Council may "Represent, but not commit without General Council approval, the La Jolla Band of Luiseño Indians in all negotiations between the La Jolla Band of Luiseño Indians and local, State and Federal governments, their agencies and officers"; and

WHEREAS, under the Constitution and By-Laws of the La Jolla Band of Luiseño Indians, the Tribal Council is charged with the duty of protecting the health, security, and general welfare of the Tribe and all Reservation residents; and

WHEREAS, Wildland Fire Management Planning for the La Jolla Band of Luiseño Indians is essential to the health, welfare, and sovereignty of the La Jolla Band of Luiseño Indians; and

WHEREAS, the La Jolla Tribal Council wishes to develop a balanced strategic plan for fire management planning in a manner that will afford protection for Tribal members, structures, and natural and cultural resources while allowing a broad range of activities; and

WHEREAS, the La Jolla Band of Luiseño Indians Tribal Council believes that the approval of a Fire Management Plan would be in the best interest of the Tribe; and

WHEREAS, the La Jolla Band of Luiseño Indians Tribal Council believes that the Fire Management Plan is in accordance with the Tribe's values; and

WHEREAS, the La Jolla Band of Luiseño Indians Tribal Council supports the use of prescribed fire as a management tool to protect Tribal resources.

NOW, THEREFORE, BE IT RESOLVED by the La Jolla Band of Luiseño Indians General Council that it hereby approves and adopts the Wildland Fire Management Plan for the La Jolla Band of Luiseño Indians; and

BE IT FURTHER RESOLVED by the La Jolla Band of Luiseño Indians Tribal Council that the Tribe hereby approves and adopts the Wildland Fire Management Plan; and

BE IT FINALLY RESOLVED that the Chairperson of the La Jolla Band of Luiseño Indians and/or the Vice-Chairperson, in the absence of the Chairperson, is hereby authorized to **sign and execute** the La Jolla Wildland Fire Management Plan and all its associated documents, and to execute all amendments thereto.

CERTIFICATION

WE THE UNDERSIGNED OFFICIALS, of the La Jolla Band of Luiseño Indians do hereby certify that the foregoing Resolution TC _____ was adopted at a duly held Tribal Council meeting on _____ 202__ with a vote of;

_____ In Favor _____ Opposed _____ Abstaining.

Wesley Ruise Jr., Tribal Chairperson

Jack Musick, Vice-Chairman

Angela Miner, Secretary

Joseph Amago, Treasurer

John Paipa, Council Member

2025 WILDLAND FIRE MANAGEMENT PLAN APPROVAL

This 2025 La Jolla Wildland Fire Management Plan (WFMP) has been developed and implemented with the full and active consultation and participation of the La Jolla Band of Luiseño Indians Tribe and is supported by their written Tribal objectives. The final draft of the 2025 La Jolla WFMP has been reviewed by the Bureau of Indian Affairs (BIA) Regional Director and the BIA Agency Fire Management Officer.

The approval of this 2025 La Jolla WFMP will concurrently remove the La Jolla Indian Reservation from the 2002 Fire Management Plan For 16 Southern California Indian Reservations/Public Domain Indian Allotments. The Parties acknowledge that this Agreement entirely replaces the Prior Wildland Fire Management Plan. This WFMP shall become fully effective, and the Prior WFMP shall be terminated, upon the Parties' approval of this WFMP. Upon such approval, all provisions of the Prior WFMP are entirely superseded and replaced by this document and will have no further force or effect.

THIS WFMP IS A LIVING DOCUMENT and will remain current until the approval of a renewed, modified, or rewritten plan, which will require a new approval page and date. The La Jolla Band of Luiseño Indians will formally review this WFMP before April 31, 2035.

APPROVAL RECOMMENDED BY:

La Jolla Fire Chief: _____ on _____, 2025

SCA Agency FMO: _____ on _____, 2025

PRO Regional FMO: _____ on _____, 2025

APPROVED BY:

TRIBAL CHAIRPERSON, Wesley Ruise Jr.: _____

APPROVED _____, 2025.

TRIBAL RESOLUTION _____

REGIONAL DIRECTOR PACIFIC REGION, Ryan Hunter _____

APPROVED _____, 2025

Wildland Fire Management Plan

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1. INTRODUCTION AND PURPOSE OF THE WILDLAND FIRE MANAGEMENT PLAN

1.1 PURPOSE FOR DEVELOPING A WILDLAND FIRE MANAGEMENT PLAN

This Wildland Fire Management Plan (WFMP) defines and documents the La Jolla Band of Luiseño Indians' comprehensive program for managing wildland fire. The primary purpose of this plan is to safeguard life, property, natural resources, and cultural values within the La Jolla Indian Reservation (LJIR).

The increasing frequency and intensity of wildland fires are driven by several converging factors:

- **Fire Exclusion:** Decades of suppressing all fires have led to a significant accumulation of hazardous fuels, creating conditions susceptible to more severe and widespread wildfires.
- **Climate Change:** Altering climate patterns, including rising temperatures and prolonged droughts, exacerbate the risk and severity of wildfires.
- **Increased Development:** The expansion of human settlements into the wildland-urban interface (WUI) dramatically increases the potential for human-caused ignitions.

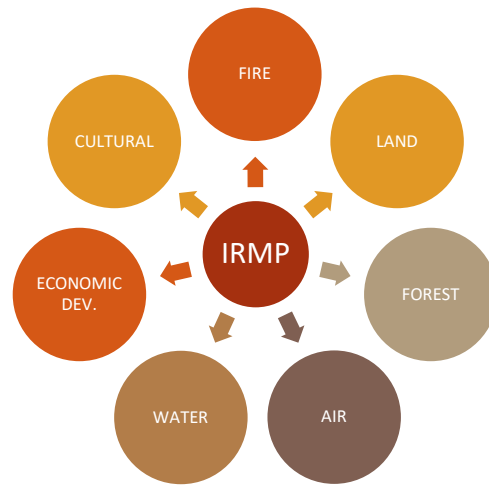
These factors contribute to:

- **Altered Ecosystems:** High-intensity fires can drastically change the composition and structure of forests and rangelands, negatively impacting biodiversity and overall ecosystem health.
- **Increased Risk:** Larger and more intense fires pose a greater threat to human life, property, and critical infrastructure.

This Wildland Fire Management Plan (WFMP) aims to proactively address these challenges through the following key strategies:

- **Reducing Hazardous Fuels:** Implementing a comprehensive, landscape-scale approach to fuel reduction utilizing both prescribed fire and non-fire treatment methods.
- **Improving Fire Preparedness:** Enhancing early detection and response capabilities, including improved communication and coordination with local, state, and federal agencies.
- **Promoting Fire-Adapted Communities:** Collaborating with Tribal communities to develop and implement strategies that mitigate wildfire risk within and around developed areas.

This WFMP incorporates the principles outlined in the 2001 BIA Southern California Regional Plan and is designed to protect Tribal resources, cultural values, and community safety. The following sections detail the Wildland Forest Fire Protection Program and define the key strategies for its implementation and management of both wildland and prescribed fires.



Wildland Fire Management Plans (WFMPs) are critical documents for reservations, serving as a strategic roadmap for managing fire-related activities across all burnable vegetation areas. WFMPs outline operational procedures to guide various fire management tasks and are the foundational step in fulfilling a reservation's fire management obligations by providing a comprehensive framework for these activities.

Importance of WFMPs:

- **Strategic Direction:** WFMPs provide a comprehensive framework for fire management activities on a reservation.
- **Meeting Fire Management Responsibilities:** A WFMP is the foundational step in fulfilling a reservation's fire management obligations.

How the Red Book Complements WFMPs:

The Bureau of Indian Affairs' (BIA) Wildland Fire and Aviation Program Management and Operations Guide, also known as the Red Book, supplements WFMPs by offering detailed guidance on various elements of the Federal Wildland Fire Policy. Key areas covered by the Red Book include:

- **Firefighter Safety:** Emphasizing the safety of personnel involved in wildland fire operations.
- **Ecosystem Sustainability:** Promoting fire management practices that consider the ecological health of the reservation's land.
- **Fire Response and Use:** Providing guidance on both suppressing wildfires and utilizing prescribed fires for beneficial purposes.
- **Stabilization and Rehabilitation:** Outlining strategies for restoring and stabilizing areas affected by wildfires.
- **Protection Priorities:** Assisting in establishing priorities for protecting various resources and assets during wildfires.
- **Wildland Urban Interface (WUI):** Offering specific guidelines for managing fire risks in areas where developed areas meet wildlands.
- **Planning, Science, and Preparedness:** Emphasizing the importance of planning, scientific knowledge, and preparedness in effective fire management.
- **Suppression and Prevention:** Providing guidance on both suppressing ongoing wildfires and implementing preventive measures to reduce fire risks.
- **Standardization and Cooperation:** Promoting standardized practices and fostering interagency collaboration in wildland fire management.
- **Communication and Education:** Highlighting the importance of clear communication and fire safety education for all stakeholders.
- **Roles and Responsibilities:** Clarifying the roles and responsibilities of agency administrators, employees, and other involved parties.
- **Evaluation:** Emphasizing the need for evaluating fire management practices for continuous improvement.

In essence, the WFMP establishes the overall fire management strategy for a reservation, while the Red Book provides in-depth guidance on implementing various aspects of that strategy. Together, these resources ensure a comprehensive and effective approach to managing wildfires on tribal lands.

WUI/Infrastructure Considerations:

The La Jolla Band of Luiseño Indians Reservation is characterized by heavily sloped terrain with limited areas suitable for development. This scarcity has resulted in residential areas being inherently located within the Wildland-Urban Interface (WUI), posing unique land use planning challenges. The primary planning goal is to minimize the risk to human life and property within the WUI through a multifaceted approach encompassing:

- **Fuel Management:** Implementing and maintaining strategic fuel breaks to reduce fire intensity and slow fire spread. Conducting targeted fuel treatments around structures, considering fuel type, topography, wind patterns, and expected fire behavior.
- **Community Fire Safety:** Promoting fire-safe communities through public education campaigns on fire hazards and the importance of fuel reduction measures. Collaborating with the Fire Department (FD) to educate residents on creating defensible space around structures.
- **Infrastructure Protection:** Prioritizing the protection of critical infrastructure, such as oil and gas facilities, through targeted fuel treatments and fire suppression efforts.
- **Arson Prevention:** Continuing efforts to reduce the occurrence of arson fires in identified problem areas.
- **Suppression Efforts:** Emphasizing the complete suppression of all wildland fires within accessible areas containing residences, structures, or critical infrastructure. Enhancing suppression capabilities by ensuring adequate defensible space around structures to facilitate effective fire protection.

1.2 DEVELOPING THE WILDLAND FIRE MANAGEMENT PLAN

This Wildland Fire Management Plan (WFMP) was developed through a deeply collaborative process guided by the La Jolla Tribal Council. Its primary goal is to align with overarching Tribal objectives and address the unique needs and cultural context of the La Jolla community.

A Foundation of Tribal Values

Wildfire prevention and proactive, culturally informed land management are essential to preserving the Tribe's core values. This plan prioritizes the **protection, restoration, and enhancement of the Reservation's natural resources**. Key objectives include:

- **Strengthening Tribal Capacity:** Building the Tribe's internal ability to safely and effectively support pile burning activities by Tribal members, recognizing these as vital cultural and land stewardship practices.
- **Utilizing Prescribed Fire:** Strategically using prescribed fire as a tool to improve the long-term health of forests and other ecosystems, reduce hazardous fuels, enhance biodiversity, and support the continuation of traditional cultural burning.

At its core, this plan restores fire as an essential ecological process while maintaining an unwavering commitment to protecting life, property, infrastructure, and irreplaceable cultural resources.

A Collaborative and Community-Driven Process

The development of this WFMP was a multi-year effort centered on community engagement and transparent oversight. The process ensured the final document reflects the needs, traditional ecological knowledge, and concerns of the La Jolla Band of Luiseño Indians.

The timeline of its creation highlights this collaborative approach:

- **2019:** Initial draft of the Wildland Fire Management Plan (FMP) was developed with funding and coordination from the Bureau of Indian Affairs (BIA).
- **2022–2024:** The plan revision process was formally launched with a series of dedicated meetings. Over this period, **nine public meetings** were held, providing a forum for community members, the Tribal Council, and the La Jolla Reservation Fire Department (LJRFD) to participate directly in drafting and reviewing the plan. Drafts were also distributed in print and on USB drives, and community input was solicited through Tribal newsletters.
- **2025:** Following a final review period and incorporation of feedback from the BIA, the revised plan was presented to the Tribal Council and, finally, the General Council in October 2025, concluding the community review process.



Photo 1. August 17, 2023, Community meeting on Fire & Natural Resources

To ensure this partnership continues, the Tribe maintains accessible channels for ongoing community input, including annual meetings and the ability for members to submit concerns or traditional knowledge directly to the Tribal Council or Fire Department at any time.

Integrated Planning and Interagency Coordination

Effective fire management requires seamless integration both internally among Tribal departments and externally with agency partners.

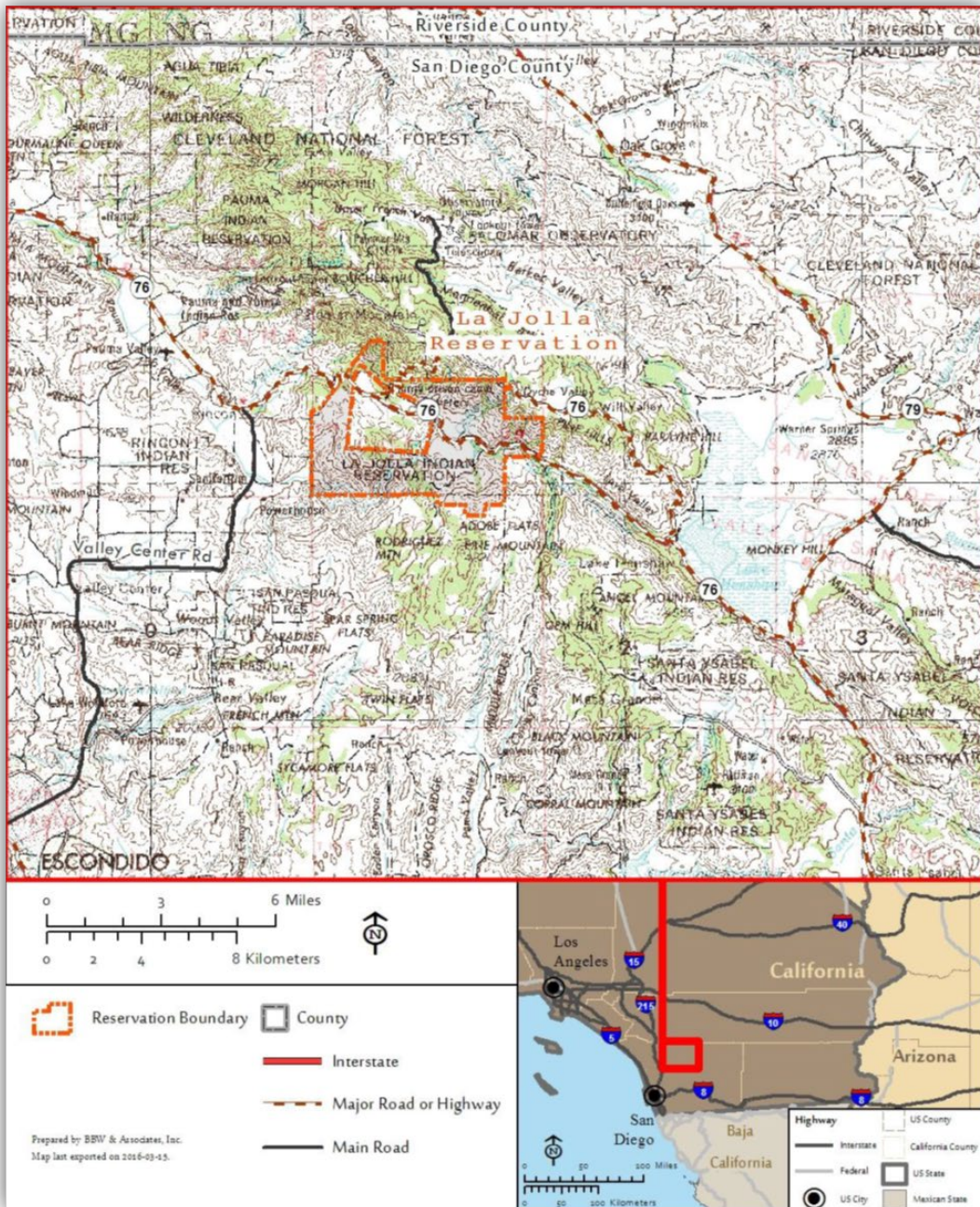
Integrated resource management at La Jolla is an ongoing, collaborative process involving the **Fire Department, Environmental Protection Office, Natural Resources Department, Public Works, Tribal Historic Preservation and Tribal Enterprises**. Regular monthly meetings ensure robust communication and coordination. The future Integrated Resource Management Plan (IRMP) will serve as a unifying framework, ensuring this WFMP is consistent with all other Tribal management plans.

This WFMP was developed with significant input from partners, including **the Bureau of Indian Affairs, Cleveland National Forest, the California Department of Forestry and Fire Protection (CAL FIRE)**, and neighboring Tribal Fire Departments. Wildfire management goals are coordinated across a landscape basis through:

- Joint training exercises and pre-fire planning meetings.
- Adherence to **National Wildfire Coordinating Group (NWCG)** standards.
- Open and consistent communication between fire management staff across all jurisdictions.

The plan also references and supports other key documents, such as the La Jolla disaster resiliency plan, the draft forest management plan, and regional plans from the BIA and CAL FIRE.

Map 1. Locality Map



326

1.3 AREAS, LOCATION, DESCRIPTION, AND FIRE HISTORY



Photo 2 from the steep north slope looking down to the south of the LJ reservation.

327 Established in 1875 by Presidential Executive Order, the La Jolla Indian Reservation (LJIR) encompasses
328 8,077 acres held in trust for the La Jolla Band of Luiseño Indians by the Bureau of Indian Affairs (BIA), a
329 division of the U.S. Department of the Interior (DOI). This land base represents a significant reduction
330 from the ancestral territories of the native Luiseño people. The LJIR is situated within the Pauma Valley,
331 nestled in the rugged foothills of Palomar Mountain in northeastern San Diego County, California,
332 approximately 30 miles east of Interstate 15 via State Highway 76 and roughly 30 miles inland from the
333 city of Escondido.

334 The La Jolla Band of Luiseño Indians is governed by a General Council, which delegates daily
335 administrative affairs to a five-member elected Tribal Council. This Tribal Council comprises a Chair,
336 Vice-Chair, Treasurer, Secretary, and one Member-at-Large, each serving a two-year term. The current
337 enrolled Tribal membership numbers approximately 700 individuals. The Reservation's total population,
338 which includes Tribal members, their descendants, non-member Native Americans, and non-Native
339 residents, totals approximately 800 people.

340 The LJIR is characterized by its remote, rural, and significantly rugged mountainous terrain situated on
341 the windward, western slopes of Palomar Mountain (Photo 1, Map 1). Elevations across the Reservation
342 exhibit a substantial range, from approximately 920 feet to 5,080 feet above mean sea level. The San
343 Luis Rey River, a vital waterway, traverses the Reservation, and the surrounding landscape is
344 predominantly defined by steep, often precipitous slopes and geologically complex, fault-ridden valleys.
345 These inherent topographical features present considerable challenges for both infrastructure
346 development and effective fire management, including a limited and often winding road network and
347 steep inclines that significantly impede access for fire suppression resources and the implementation of
348 crucial fuel treatment projects.

349 The region experiences a distinct Mediterranean climate, characterized by mild, wet winters followed by
350 hot, intensely dry summers. This climatic regime contributes to a well-defined and often prolonged fire
351 season, typically extending from late spring through the fall months. During this period, the prevalent
352 vegetation, consisting primarily of highly flammable chaparral shrublands and California oak woodlands,

becomes exceptionally dry and readily ignitable. Average annual rainfall exhibits significant variability across the Reservation, ranging from approximately 14 inches in the southwestern portions to nearly 40 inches in the higher elevations of the northeast. Winter temperatures can occasionally drop to the low 30s Fahrenheit, while summer temperatures frequently exceed 100 degrees Fahrenheit (the average annual temperature is approximately 55 degrees Fahrenheit). These pronounced temperature extremes and the substantial variations in rainfall directly and significantly influence the moisture content of the vegetative fuels, leading to conditions of high flammability during the extended dry season. These conditions, when coupled with periods of high heat and low relative humidity, can also contribute to the development of extreme and unpredictable wildfire behavior.

1.3.1 TRIBAL OPERATIONS AND RESIDENTIAL AREAS

The La Jolla Indian Reservation supports a diverse and vital range of Tribal operations, encompassing numerous departments and enterprises that serve the community and manage Tribal resources. These include: Tribal Administration (overseeing governance and essential services), the La Jolla Bike Park, the La Jolla Zipline, the La Jolla Campground & Adventure Park (significant recreational and economic drivers), the Environmental Protection Office (responsible for air and water quality, waste management, and environmental compliance), the La Jolla Reservation Fire Department (dedicated to fire prevention, preparedness, and suppression), the Natural Resources Department (managing forestry, wildlife, and other natural resources), the Historic Preservation Office (safeguarding cultural heritage and sacred sites), the Public Works Department (maintaining infrastructure and providing essential services), the Education Department (supporting Tribal education initiatives), Tribal Law Enforcement (ensuring public safety and enforcing Tribal laws), and the Trading Post (a key community and economic hub).

Residential areas on the La Jolla Indian Reservation are primarily concentrated in two distinct geographical locations (Map 1):

- **West Side Residential Area:** This area is primarily situated along Red Gate Road and Harolds Road and encompasses approximately 50 individual residences. This established community forms a significant portion of the Reservation's population.
- **East Side Residential Area:** A larger and more geographically dispersed residential area, also containing approximately 50 residences, extends along a corridor from Church Road in the north to the community of Poomacha on the south side of State Highway 76. This area represents another key population center on the Reservation.

Significantly, the majority of Tribal enterprises and essential administrative buildings are strategically located within or in close proximity to these general residential areas, fostering community cohesion and accessibility. These key facilities include the Tribal Hall (the center of Tribal governance and community gatherings), the gymnasium (a vital recreational and community facility), the La Jolla Campground & Adventure Park, the Trading Post (serving as a commercial and social hub), and various administrative offices supporting Tribal operations. The close proximity of these critical infrastructure and economic drivers to residential areas underscores the importance of robust wildfire protection planning and preparedness in these specific locations.

1.3.2 LEGAL DESCRIPTION AND APPLICABILITY

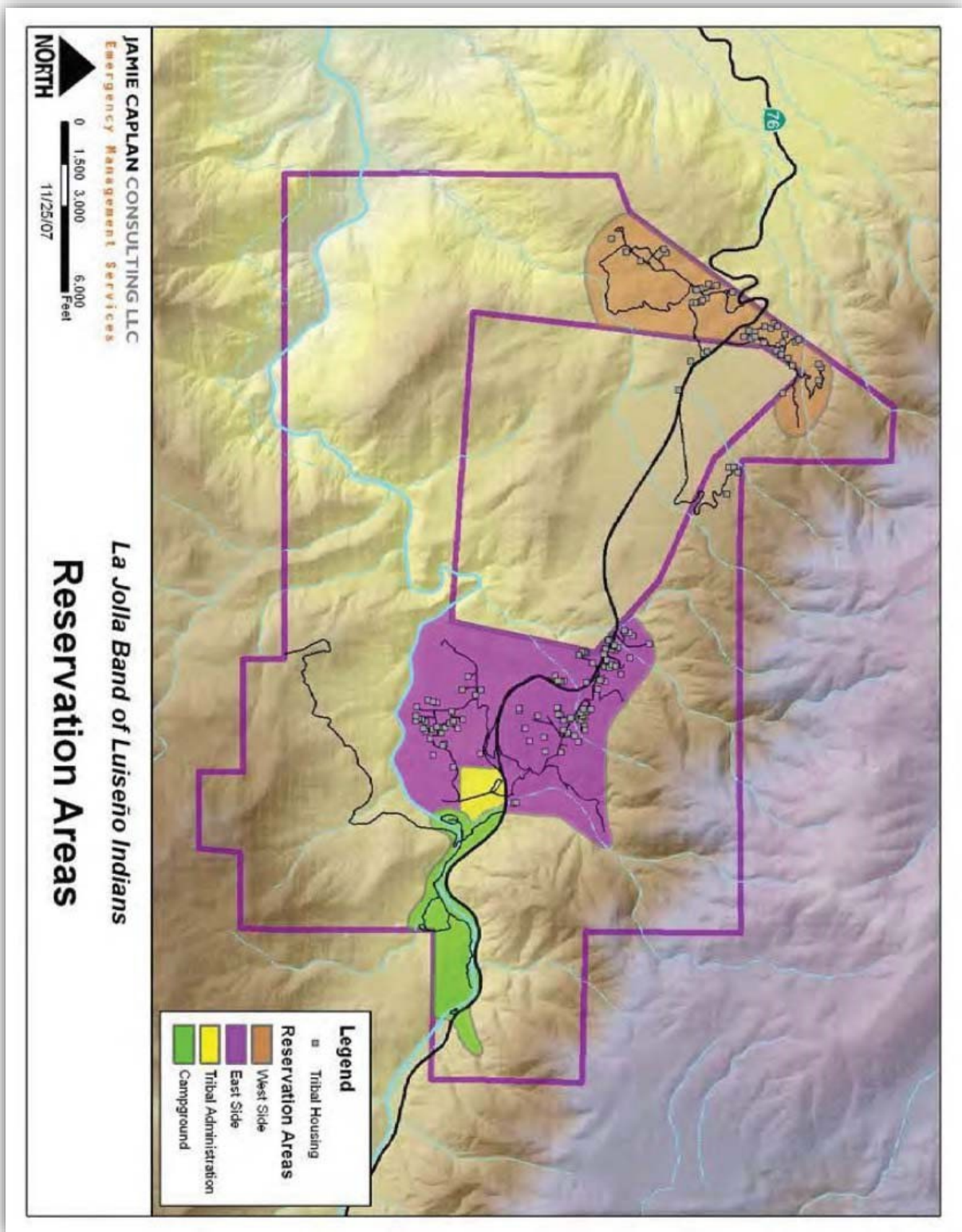
392 The legally defined boundaries of the La Jolla Indian Reservation (LJIR) (Map 3&4) encompass the
 393 following surveyed and un-surveyed lands:

- 394 • **Within Township 10 South, Range 1 East, San Bernardino Base and Meridian (SBBM):** All or
 395 portions of Sections 17, 18, 19, 20, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 33, 34, and 35.
- 396 • **Within Township 11 South, Range 1 East, San Bernardino Base and Meridian:** Portions of
 397 Sections 2 and 3.
- 398 • **Special Survey Area:** A portion of the specifically surveyed area historically known as Cuca or El
 399 Potrero.
- 400 • **Un-sectioned Public Land Survey System (PLSS) Area:** A designated part of the Reservation that
 401 has not been formally subdivided into standard PLSS sections.

402 For administrative and project management purposes, the Bureau of Indian Affairs (BIA) delineates the
 403 LJIR into 81 individual tracts, as detailed in Table 1. These distinct tract numbers serve as the standard
 404 reference for accurately locating projects and activities within the Reservation's boundaries.

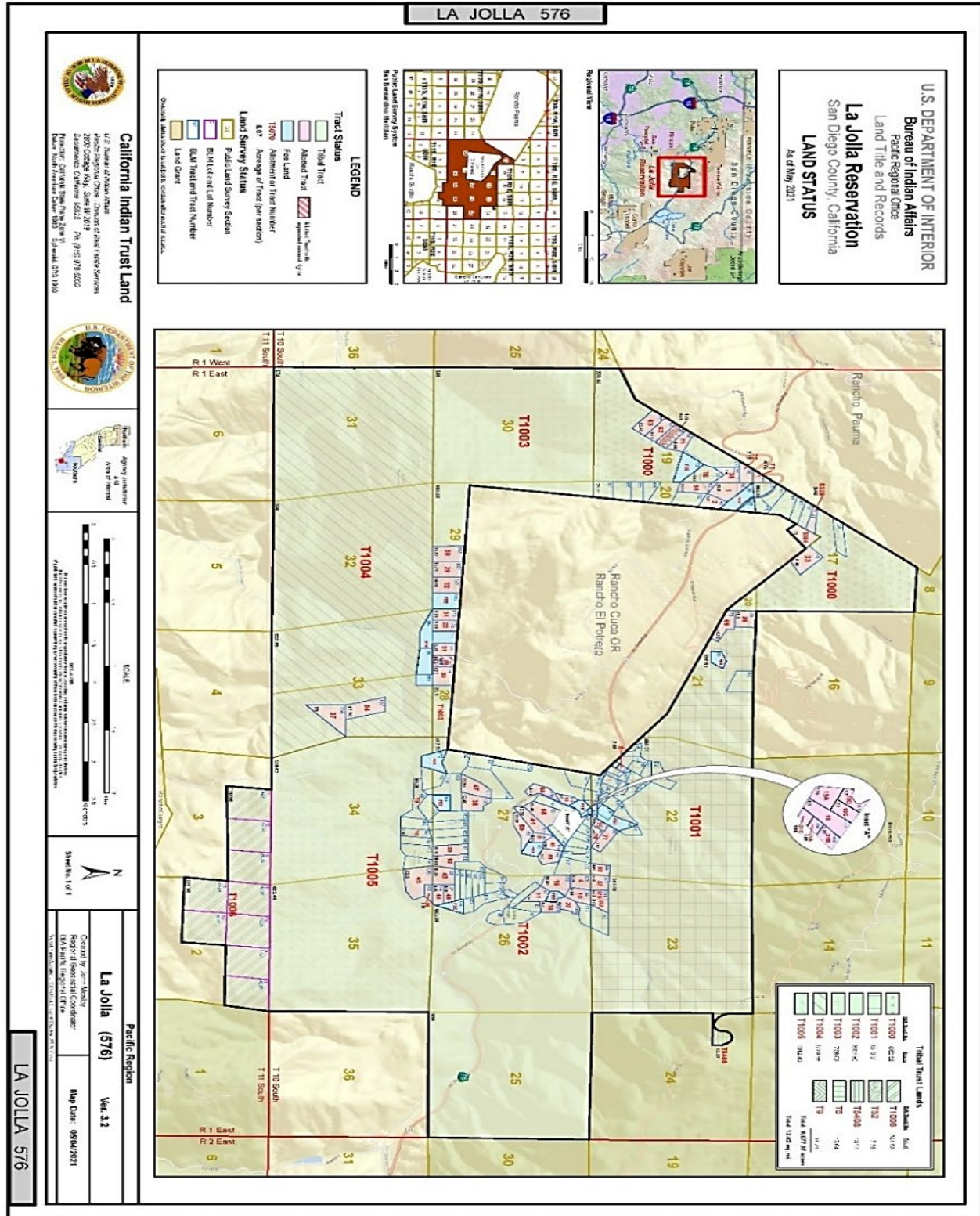
405 **Table 1. BIA Tract IDs**

Bureau of Indian Affairs LJIR Tract IDs								
576	576 20	576 33	576 47	576 59	576 68	576 T1002	576 T1001	576 19D
576 1	576 21A	576 35	576 48	576 61A	576 69	576 T1003	576 67B	576 45
576 10	576 21B	576 36	576 5	576 61B	576 70	576 T1004	576 57	576 31
576 11	576 21C	576 37	576 50	576 61C	576 71	576 T1005	576 46	576 M28
576 12	576 22	576 38	576 51	576 61D	576 72	576 T1006	576 32	576 66
576 14	576 24	576 39	576 53	576 61E	576 73	576 T52	576 2	576 5504
576 15	576 26	576 4	576 5329	576 61F	576 75	576 T5408	576 T1000	576 44
576 16	576 28	576 41	576 54	576 62	576 76	576 T6	576 67A	576 30
576 9A	576 29	576 43	576 55	576 63	576 77	576 T9	576 56	576 19C

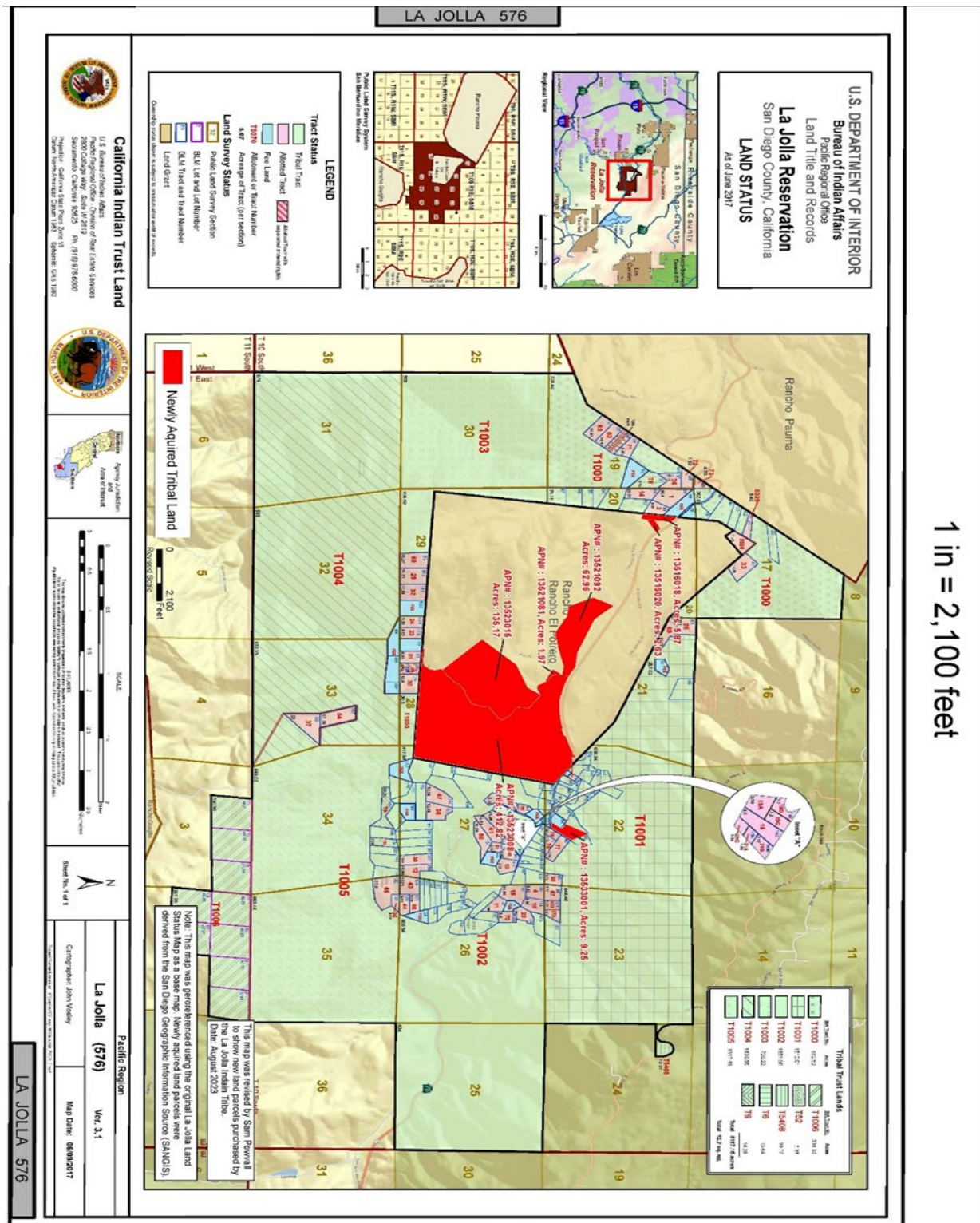


406

407 **Map 2. Reservation Areas**



Map 3 2021 Land Status Map



This Wildland Fire Management Plan (WFMP) has jurisdictional authority and applies directly to all Trust lands held for the benefit of the La Jolla Band of Luiseño Indians that fall within the legally defined boundaries of the La Jolla Indian Reservation (LJIR) as described above. The diverse and sometimes intricate landownership patterns existing within the LJIR present significant complexities for the comprehensive management of these lands, particularly in the context of wildland fire prevention, preparedness, and fuel management. The various land types encountered within the Reservation include:

- **Trust Land:**
 - **Ownership:** beneficial interest (ownership) remains with an Indian tribe or individual Indian where the United States government holds legal title in trust to be managed for the benefit of the tribe or individual owners.
 - **Management:** Managed under Tribal authority, with oversight from the Bureau of Indian Affairs (BIA), empowering the Tribe with greater control over land use planning and resource management, including fire management strategies.
- **Allotments:**
 - **Ownership:** Trust lands held in trust for individual Tribal members.
 - **Management:** Individual Tribal members hold primary management responsibilities. Effective fire management necessitates coordination with the Tribe and other agencies.
- **Fee Land:**
 - **Ownership:** Privately owned land, which may be held by non-Tribal members, Tribal members, or their descendants.
 - **Management:** Landowners are responsible for managing fire risks. Coordination with the Tribe and relevant agencies is essential for cohesive fire prevention and response.
- **Fee-to-Trust Land:**
 - **Ownership:** Land acquired by the Tribe with the intent of converting it to trust status.
 - **Management:** Management planning should anticipate future trust status and integrate fire management strategies aligned with Tribal objectives.
- **Assignments:**
 - **Ownership:** Trust lands assigned to individual Tribal members for residential purposes.
 - **Management:** The Tribe retains oversight and can influence land management practices, including fire prevention and mitigation.
- **Claims:**
 - **Ownership:** Trust lands claimed by specific families that have not been formally allotted.
 - **Management:** Collaborative efforts involving the Tribe, claimants, and other stakeholders are crucial for developing and implementing effective fire management strategies.
- **Non-Trust Land:**
 - **Ownership:** Land situated outside the established boundaries of the LJIR, typically under private ownership.
 - **Management:** Managed by the respective landowners, requiring coordination with the Tribe and other agencies for regional fire management planning and response.
- **Cuca Land Grant:**
 - **Ownership:** Privately held land possessing significant historical and cultural importance to the Tribe.

- **Management:** Requires careful consideration of the land's historical and cultural value alongside effective fire management. Collaborative efforts among the Tribe, landowners, and other stakeholders are vital.

Implications for Wildland Fire and Fuel Management:



Photo 3. Wildland firefighter during Poomacha fire. photo credit Valley Center Roadrunner

1. **Land Ownership Complexity:** The diverse and intricate land ownership patterns create challenges for implementing unified and coordinated fire management efforts. Clear communication, robust collaboration, and shared responsibility among all stakeholders are paramount.
2. **Cultural and Historical Significance:** The presence of culturally and historically significant sites, notably the Cuca Land Grant, necessitates careful and sensitive consideration during all fire management activities.
3. **Resource Protection:** Fire management strategies must prioritize the protection of the Reservation's valuable natural resources, sensitive cultural sites, and critical infrastructure.
4. **Community Safety:** Ensuring the safety and well-being of Tribal members, all Reservation residents, and responding firefighters is the foremost concern guiding all fire management activities and planning.

A thorough understanding of the different land types and the complexities of ownership within the LJIR is fundamental to developing and implementing effective and culturally appropriate fire management strategies that adequately address the unique needs and values of the La Jolla Band of Luiseño Indians.

1.3.3 FIRE HISTORY

The 2007 Poomacha Wildfire (Map 5) serves as a stark and devastating reminder of the severe wildfire threat confronting the La Jolla Indian Reservation (LJIR), underscoring the following critical concerns:

Severity of Impact:

- **Widespread Devastation:** The Poomacha Wildfire consumed 95% of the LJIR, resulting in the tragic loss of 52 homes.
- **Significant Post-Fire Impacts:** The fire dramatically altered the landscape, leading to severe and prolonged secondary impacts such as flooding, erosion, and landslides, causing further damage and necessitating the temporary closure of a portion of the highway, disrupting transportation and access.

Contributing Factors:

- **Santa Ana Winds:** Strong, dry Santa Ana winds acted as a primary catalyst, rapidly fueling the wildfire's spread and intensity.
- **Rugged Terrain:** The steep and mountainous terrain characteristic of the LJIR exacerbated the fire's behavior, contributing to its rapid movement and difficulty in suppression.
- **Dry Mediterranean Climate:** The region's Mediterranean climate, with its typically hot, dry summers and occasional drought periods, creates inherently flammable vegetation and increases the overall wildfire risk.

Vulnerabilities:

- **Universal Structural Risk:** The Poomacha Wildfire tragically demonstrated that all structures within the LJIR, including residences, essential utilities, and critical community facilities, are susceptible to significant fire damage or destruction.
- **Limited Access Challenges:** The remote location of the LJIR, coupled with limited road access, presents substantial challenges for timely evacuations and effective emergency response efforts during wildfire events.
- **Persistent Post-Fire Hazards:** The risk of dangerous post-fire hazards, such as flash flooding, accelerated erosion, and destabilizing landslides, remains a significant and long-term concern for the Reservation and its inhabitants.



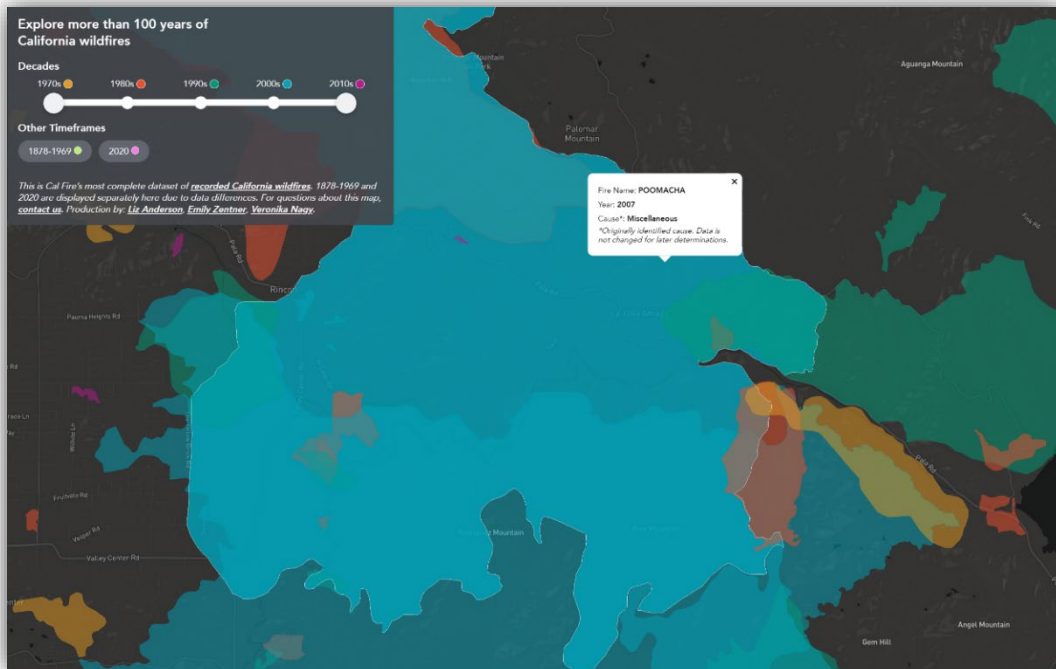
Photo 1. Wildfire on the Reservation

Mitigation Efforts:

Since the 2007 wildfire, the La Jolla Band of Luiseño Indians has proactively implemented various mitigation strategies aimed at reducing the risk and impact of future wildfires. These efforts likely encompass a range of measures, including strategic fuel reduction projects, enhancements to fire prevention and suppression capabilities, and comprehensive community education and preparedness programs.

Conclusion:

The Poomacha Wildfire serves as a profound and critical lesson for the entire LJIR community. The ongoing and sustained commitment to mitigating wildfire risks, enhancing community preparedness, and continuously improving emergency response capabilities are absolutely essential to protect the lives, property, and the invaluable environment of the La Jolla Indian Reservation.



Map 5 Fire History within LJIR (<https://projects.caprudio.org/california-fire-history/#12/33.2661/-116.81483>)

1.3.4 DESCRIPTION OF THE REGION

The La Jolla Indian Reservation is located within the jurisdiction of the Bureau of Indian Affairs' **Southern California Agency (SCA)**. This region is vast and complex, overseeing 30 federally recognized reservations and numerous public domain allotments that span approximately 215,280 acres across five counties.

The area's diverse climate, topography, and vegetation create varied fire behavior and risk. Management is further complicated by several factors:

- **Fragmented Landownership:** Tribal Trust lands are often interspersed with private and other government lands, making unified management strategies challenging.

- **Severe Wildfire Conditions:** The region is prone to severe wildfires, driven by intensifying drought, dry vegetation, powerful Santa Ana winds, and increasing development in the wildland-urban interface (WUI).
- **Rich Cultural Heritage:** The area is part of the ancestral lands of the **Payómkawichum (Luiseño)**, **Kumeyaay**, and **Diegueño** peoples. Their cultural resources, including archaeological sites, sacred places, and traditional landscapes—are deeply connected to the land and highly vulnerable to wildfire.

Effective fire management in this region depends on a deep understanding of these interacting factors and requires strong collaboration between Tribal governments and other agencies to protect lives, property, and invaluable cultural resources.

1.3.5 ENVIRONMENTAL COMPLIANCE

This Wildland Fire Management Plan (WFMP) is grounded in a commitment to environmental stewardship and fully complies with the **National Environmental Policy Act (NEPA)**.

A comprehensive **Environmental Assessment (EA)** was completed to rigorously evaluate the potential environmental effects of all proposed fire management activities, from prescribed burns to mechanical fuel reduction. The EA process was a collaborative effort involving the La Jolla Reservation Fire Department, resource specialists, Tribal officials, and community representatives.

This process culminated in a **Finding of No Significant Impact (FONSI)**, which confirms that the activities outlined in this plan are not expected to have significant adverse effects on the environment. The WFMP itself represents the "preferred alternative" identified in the EA, as it most effectively balances fire management objectives with the protection of natural and cultural resources.

The NEPA process specifically ensures that all planning and operations account for:

- **Threatened and Endangered Species:** Federally and state-listed species like the southwestern willow flycatcher, arroyo toad, and coastal California gnatcatcher are considered.
- **Cultural and Natural Resources:** All significant cultural sites and natural resources are monitored and protected.

This commitment to environmental compliance is fundamental to the safety and interagency collaboration that form the bedrock of this plan. Further details on the NEPA process and mitigation measures are available in **Appendix C**.

2. PARTNERSHIPS AND MANAGEMENT GOALS/OBJECTIVES

This Wildland Fire Management Plan (WFMP) serves as the foundational guiding document for the comprehensive implementation of fire management policies and strategies on the La Jolla Indian Reservation. Its purpose is to systematically direct fire-related activities towards the clear achievement

of defined fire management goals, all within the context of the following critical and overarching frameworks:

- **Interagency Fire Management Plans:** These are collaborative and formally established plans that outline mutually agreed-upon approaches to all aspects of fire management across multiple jurisdictional boundaries. They involve active participation and coordination among various federal, state, and Tribal agencies, such as the Bureau of Indian Affairs (BIA), the U.S. Forest Service (USFS), the California Department of Forestry and Fire Protection (CAL FIRE), and potentially neighboring Tribal fire departments. These interagency plans provide a robust framework for coordinated and unified efforts in crucial areas including public education and fire prevention initiatives, efficient and effective wildland fire suppression operations, and the necessary post-fire recovery and ecological rehabilitation of affected landscapes. They ensure a cohesive and strategic response to fire incidents that may transcend individual agency boundaries.
- **Tribal Goals and Objectives:** This WFMP must be explicitly and intrinsically aligned with the broader, articulated goals and objectives of the La Jolla Band of Luiseño Indians. These Tribal priorities may encompass a wide spectrum of crucial considerations, including the active preservation and perpetuation of cultural heritage and sacred sites, the pursuit of sustainable and culturally sensitive economic development opportunities, the diligent protection and enhancement of the Reservation's valuable natural resources (such as water, forests, and wildlife), and the overall health, safety, and well-being of the entire Tribal community. The WFMP will reflect and directly support these overarching Tribal aspirations in all its fire management strategies and actions. Given that the Tribe does not currently have any pre-existing Tribal ordinances or policies specifically related to fire and resource management, this WFMP will, in part, lay the groundwork for potential future Tribal regulations in these critical areas.
- **Legal and Regulatory Requirements:** The WFMP is mandated to adhere strictly to all applicable federal, state, and potentially future Tribal laws and regulations that pertain to fire management activities. This includes ensuring full compliance with key environmental legislation, such as the National Environmental Policy Act (NEPA), which requires thorough environmental analysis of proposed actions, and the Endangered Species Act (ESA), which necessitates the protection of threatened and endangered species and their habitats during fire management operations. Adherence to these legal and regulatory frameworks is paramount to responsible and legally sound fire management practices.

Essentially, this WFMP acts as the practical, detailed, and operational blueprint for implementing all fire management activities on the ground within the La Jolla Indian Reservation. It serves as the crucial link between high-level policy and on-the-ground action, ensuring that all fire-related interventions, from prevention efforts to suppression tactics and post-fire management, are consistently aligned with broader land management objectives, effectively coordinated with neighboring agencies to ensure seamless response, directly support the established priorities and values of the La Jolla Tribe, and fully comply with all applicable legal and regulatory mandates at the federal, state, and potentially Tribal levels.

2.1 PARTNERSHIPS

2.1.1 COLLABORATION AND TRIBAL CONSIDERATIONS:

While neighboring land management agencies operating in the vicinity of the La Jolla Indian Reservation (LJIR) may have distinct primary missions (e.g., ecological conservation, public recreation, sustainable timber production), shared ecological realities often necessitate and facilitate the adoption of collaborative best practices in wildland fire management. This collaborative approach includes proactively addressing common landscape-level threats that transcend jurisdictional boundaries, such as significant forest insect and disease outbreaks leading to widespread tree mortality and increased fuel loads, and the aggressive proliferation of invasive plant species like cheatgrass and tree of heaven, which dramatically alter native vegetation communities and substantially elevate overall wildfire danger. Notably, the San Luis Rey River corridor, a vital ecological and cultural feature, traverses the landscape, creating a continuous and often dense region of vegetation that could readily facilitate the rapid spread of an east wind-driven fire across multiple ownerships. Recognizing this interconnectedness, multi-use land management approaches are prevalent among most agencies operating in the region surrounding the LJIR, providing significant opportunities for strategic alignment in fire management strategies, coordinated pre-fire planning efforts, and seamless interagency response protocols.

Crucially, fire management strategies implemented on Tribal lands are uniquely and fundamentally informed by, and actively consider, the deeply held cultural, religious, spiritual, and intrinsic natural resource values of the La Jolla Band of Luiseño Indians. This necessitates a distinct and culturally sensitive approach to fire management that respects these integral aspects of Tribal identity, sovereignty, and traditional ecological knowledge. Proactive and consistent communication and collaboration are diligently facilitated through regularly scheduled pre-fire season meetings, the joint development and sharing of critical resource guides and operational plans between the Tribe and neighboring agencies, and the establishment of clear communication pathways during active incidents. These efforts are essential to foster mutual understanding of differing management objectives, build strong working relationships and trust, and ensure seamless and coordinated response efforts during wildfire incidents, ultimately enhancing the safety and protection of all resources and communities.

2.1.2 WILDLAND FIRE INTERAGENCY PARTNERSHIPS AND AGREEMENTS

Effective implementation of the Wildland Fire Management Plan (WFMP) for the La Jolla Indian Reservation (LJIR) is predicated on robust coordination, active communication, and the establishment of formal and informal agreements with external organizations. Interagency cooperation, encompassing the proactive sharing of critical resources (personnel, equipment, and information) and the strategic alignment of daily operational activities, is absolutely crucial across all organizational levels to achieve effective and efficient fire management outcomes. The specific importance, scope, and details of these collaborative partnerships and agreements are further detailed in Section 2.2 of the full WFMP document, outlining the framework for interagency coordination in prevention, preparedness, suppression, and post-fire management.

Effective and collaborative fire management on the LJIR is built upon strong, respectful, and mutually beneficial partnerships with the following key entities, recognizing their distinct roles and contributions:

- **Bureau of Indian Affairs (BIA):** As the primary federal land management agency with trust responsibility for the LJIR, the BIA provides essential funding, technical assistance, policy guidance, and often direct operational support for fire management activities.
- **State Agencies (e.g., CAL FIRE):** The California Department of Forestry and Fire Protection (CAL FIRE) plays a critical role in wildland fire protection across the state, offering mutual aid,

expertise, and coordination, particularly on non-federal lands adjacent to or intermingled with the Reservation.

- **County Agencies (e.g., San Diego County Fire Authority):** The San Diego County Fire Authority and other relevant county agencies provide local fire protection services, often including initial attack capabilities and valuable local knowledge of the terrain and community.
- **Tribal Entities (including internal Tribal departments and potentially neighboring Tribal governments, fostering inter-Tribal cooperation):** Collaboration extends beyond the LJIR's Fire Department to include other Tribal departments (e.g., Natural Resources, Environmental Protection, Public Safety) and fosters mutually supportive relationships with fire management programs of neighboring Tribal governments, recognizing shared cultural and ecological concerns.
- **Local Agencies and Organizations (e.g., volunteer fire departments, community groups, and potentially local environmental organizations):** Engagement with local volunteer fire departments, community-based organizations, and environmental groups is vital for public education, prevention initiatives, and building community resilience to wildfire.

2.2 GENERAL OBJECTIVES AND GUIDANCE

The Wildland Fire Management Plan (WFMP) for the La Jolla Indian Reservation (LJIR) is guided by the following core goals and objectives, placing Tribal values and resource stewardship at the forefront:

- **Community Values:** To ensure all fire management activities are intrinsically aligned with and demonstrate profound respect for the deeply held values, cultural priorities, and the overall well-being of the La Jolla Band of Luiseño Indians.
- **Protection and Sustainability:** To prioritize the safety of all people residing on and visiting the Reservation, as well as the protection of Tribal property and infrastructure, while simultaneously pursuing the sustainable management and long-term protection of the Reservation's invaluable natural and cultural resources for future generations.
- **Cultural Preservation:** To proactively integrate the safeguarding of significant cultural sites, the perpetuation of traditional practices, and the protection of culturally important resources (including plants, animals, and landscapes) into every facet of fire management strategies, recognizing their irreplaceable value to the Tribe.
- **Ecological Integrity:** To implement fire management practices, including the potential for prescribed fire and cultural burning, that aim to maintain and enhance the ecological health, natural resilience, and native biodiversity of the Reservation's diverse landscape, recognizing the vital role of fire in shaping these ecosystems.
- **Long-Term Planning:** To adopt a proactive, adaptive, and forward-thinking management approach with a 10-year planning horizon, anticipating future environmental changes, evolving Tribal needs, and incorporating the best available science and traditional ecological knowledge into fire management strategies.

2.2.1 POLICY FRAMEWORK:

The LJIR WFMP operates within the following robust policy framework, ensuring comprehensive compliance and seamless alignment with all relevant regulations, guidelines, and Tribal sovereignty:

- **National, Tribal, and Agency Fire Policy Review:** A comprehensive and ongoing analysis of existing National (federal), Tribal (La Jolla Band of Luiseño Indians), and Bureau of Indian Affairs (BIA) fire policies and guidelines is conducted to guarantee consistent application, thorough adherence, and the assertion of Tribal self-governance in fire management decisions.
- **Tribal Responsibilities Definition:** Clear and unambiguous articulation of the inherent roles, responsibilities, and sovereign authorities of the La Jolla Band of Luiseño Indians in all aspects of fire management activities occurring on the Reservation's lands and involving its members.
- **BIA Responsibilities Definition:** Clear and unambiguous articulation of the specific roles, responsibilities, and legal obligations of the Bureau of Indian Affairs in the context of fire management activities conducted on LJIR Trust lands, respecting the Tribe's self-determination.
- **Federal Wildland Fire Management Policy Incorporation:** Full and informed integration of and adherence to all applicable federal policies and guidelines governing wildland fire management practices, ensuring compliance while upholding Tribal sovereignty and self-direction.

2.2.2 SUMMARY OF THE WILDLAND FIRE MANAGEMENT PLAN (WFMP) POLICIES

This section of the WFMP outlines the fundamental safety principles that underpin all fire management activities and references the key policies and guidelines that directly direct every action undertaken on the La Jolla Indian Reservation (LJIR).

Core Principles:

- **Safety First:** The absolute safety of all personnel involved in fire management activities, as well as the safety of the general public, is the paramount and non-negotiable consideration in every decision and action taken. The Incident Commander (IC), Incident Management Team (IMT), and all fire line supervisors bear the ultimate responsibility for proactively ensuring and maintaining a safe operational environment throughout all phases of an incident.
- **No Unnecessary Risk:** Recognizing the inherent and often unpredictable dangers associated with wildland fire incidents, no perceived urgency, regardless of the situation, can ever justify compromising human life or safety for the sake of rapid initial response, quicker fire suppression efforts, or minimizing the total burned area. Prudent and thorough risk assessment, coupled with the proactive implementation of effective risk mitigation measures, will always be the highest priority in all fire management operations.

2.2.3 REFERENCED POLICIES AND GUIDELINES:

The LJIR WFMP adheres to and fully incorporates guidance, best practices, and mandatory requirements from the following key policies and guidelines:

- **National Firefighter Red Book:** Provides comprehensive and authoritative guidance on safe operational practices and procedures for all aspects of wildland fire management (<https://www.nifc.gov/standards/guides/red-book>).
- **Bureau of Indian Affairs (BIA) Wildfire Prevention Program Handbook:** Details specific procedures, recommended best practices, and requirements for proactive fuels reduction projects and comprehensive fire prevention planning initiatives on Tribal lands

(https://www.bia.gov/sites/default/files/dup/assets/public/raca/handbook/pdf/90_iam_5-h_wildfire_prevention_handbook_final_signed_w.footer_508.pdf).

- **Indian Affairs Manual (IAM) 53 and 90:** Offers overarching policy and procedural direction for the full spectrum of fire management activities within the Bureau of Indian Affairs, providing the foundational administrative framework (<https://www.bia.gov/policy-forms/manual>).
- **Departmental Manual Part 620:** Outlines the official policies and established procedures of the Department of the Interior (DOI) governing the response to wildfire incidents on lands managed by the Department, including Trust lands (https://www.doi.gov/sites/doi.gov/files/uploads/chapter_4_wildfire_response.pdf).
- **Wildland Fire Incident Management Field Guide:** A comprehensive and essential resource providing standardized procedures and organizational structures for effectively and efficiently managing wildland fire incidents of all complexities (https://gacc.nifc.gov/swcc/dc/nmadc/dispatch_logistics/dispatch/documents/2014%20Wildland%20Fire%20Incident%20Management%20Field%20Guide.pdf).
- **2025 Incident Response Pocket Guide (IRPG), PMS 461, National Fire Equipment System 1077:** These are critical and readily accessible field reference materials providing incident response personnel with quick access to essential safety information, operational guidelines, and equipment specifications (<https://www.nwcg.gov/publications/pms461>).
- **National Wildfire Coordinating Group (NWCG) Fireline Handbook Appendix B:** A fundamental and authoritative resource for understanding, predicting, and safely responding to wildland fire behavior, providing crucial insights for tactical decision-making (<https://gacc.nifc.gov/oncc/docs/appendixB.pdf>).

2.3 LA JOLLA FIRE MANAGEMENT PROGRAM GOALS AND OBJECTIVES

The following goals and objectives for the La Jolla Indian Reservation (LJIR) fire management program have been developed through collaborative discussions with Tribal and Bureau staff, informed by relevant policy directives, and based on direct observations of program needs. This WFMP emphasizes land management goals and objectives specific to designated areas within the LJIR. This information serves as the foundation for determining how fire will be managed across the landscape to effectively achieve these Tribal priorities. Consequently, strategic fire management objectives, incorporating specific requirements, constraints, and guidelines for fire management actions, have been established for these defined land areas, as detailed in Chapter 3. Key natural resource attributes prioritized for protection and management include the San Luis Rey River corridor (encompassing bike trails, the zipline area, and the campground), native grasslands, the Oasis preserve area, Montane Hardwood forests, Engelmann oak stands, traditional native gathering areas, and wildlife preservation efforts. Furthermore, the long-term wellness of the community is intrinsically linked to the conservation of water and soil resources, as well as the maintenance of air quality.

Primary Goals:

- **Life and Property Protection:** To prioritize the safety of human life (firefighters and the public), protect property (residences, administrative buildings, businesses), safeguard cultural and ceremonial sites, and conserve vital natural resources from the threat of wildland fire.
- **Effective Fire Management Program:** To develop and maintain a comprehensive fire management program integrating proactive fire prevention, strategic fuels management, and

the responsible use of prescribed fire to mitigate fuel accumulation and reduce overall wildfire risk.

- **Enhance Forest Health:** To improve forest health and resilience through targeted fuel reduction projects and the application of prescribed fire, promoting a diverse and sustainable forest ecosystem.
- **Improved Wildland Fire Suppression:** To ensure a swift, safe, and effective initial attack response to all wildland fire ignitions that pose a threat to life, property, cultural resources, and natural resources.
- **Skilled Tribal Workforce Development:** To invest in the professional development of Tribal members through comprehensive training and career advancement opportunities within the fire management program.
- **Improve Community Air Quality:** To proactively minimize smoke impacts from both wildland fires and planned prescribed fire activities through meticulous planning and careful implementation.
- **Enhanced Fire Prevention:** To implement and rigorously enforce a range of effective fire prevention measures aimed at significantly reducing the incidence of human-caused fire ignitions.
- **Prioritization of Values at Risk:** To strategically prioritize fire protection efforts and resource allocation based on a thorough assessment of the values at risk, including human life, property, irreplaceable cultural resources, and sensitive natural resources.
- **Regional Capacity Building:** To develop the knowledge and skills of La Jolla community members and engage with the broader outside community to foster regional capacity and strength in wildland fire management and related disciplines.
- **Generate Income for Enhanced Response:** To actively explore and implement opportunities to generate income that will directly support Tribal Fire Department personnel and auxiliary support, with the ultimate goal of establishing a robust, round-the-clock response team capable of rapidly addressing all risks, including structural fires and wildland fires.
- **Support Traditional Ecological Knowledge:** To actively support the practice and implementation of Traditional Ecological Knowledge (TEK) in all aspects of the fire management program, recognizing its invaluable contributions to ecological understanding and effective land stewardship.

2.3.1 FUELS MANAGEMENT AND PRESCRIBED FIRE OBJECTIVES:

- **Reduce Fire Risk:** To minimize the potential for severe wildfires through strategic fuel reduction treatments, particularly within the wildland-urban interface.
- **Restore Natural Fire Regimes:** To utilize prescribed fire, where ecologically appropriate and beneficial, to reintroduce fire's natural role in the ecosystem, integrating Traditional Ecological Knowledge where applicable.
- **Enhance Forest Health:** To promote a healthy and diverse forest ecosystem through the application of fuel management and prescribed fire practices, informed by Traditional Ecological Knowledge.
- **Minimize Smoke Impacts:** To implement prescribed fire and manage wildfires in a manner that minimizes smoke impacts on surrounding communities, considering Traditional Ecological Knowledge regarding smoke management.

2.3.2 FIRE PREVENTION OBJECTIVES:

- **Minimize Ignition Risk:** To implement and enforce fire prevention measures, including public education, burn bans, and defensible space requirements, to reduce the likelihood of fire starts, incorporating relevant Traditional Ecological Knowledge.
- **Community Engagement:** To conduct outreach programs educating residents on fire safety and encouraging proactive fire prevention measures, integrating Tribal perspectives and Traditional Ecological Knowledge.
- **Structure Hardening:** To promote and support efforts to enhance structural resistance to wildfire through measures like defensible space and fire-resistant building materials, considering Traditional Ecological Knowledge related to fire-resistant landscaping.

2.3.3 OPERATIONAL OBJECTIVES:

- **Safety First:** Plan and implement all fire management actions with the paramount goal of protecting firefighters and public safety from wildland fires.
- **Asset Protection:** Protect structures, critical infrastructure, and identified values at risk from fire damage.
- **Ecological Restoration:** Implement restoration techniques on reservation lands to support natural fire regimes, thereby enhancing long-term resource protection from catastrophic fire.
- **Policy Compliance and Evaluation:** Annually evaluate and ensure full compliance with Federal Wildland Fire Policy and National Wildland Coordinating Group (NWCG) standards.
- **Capacity Building:** Develop and empower Tribal staff to effectively carry out wildland fire and fuels treatment programs.
- **Fire Management Unit (FMU) Objectives:** Meet established FMU objectives, including specific requirements, constraints, and implementation guidelines (as detailed in Chapter 3).
- **Informed Decision-Making:** Utilize the Wildland Fire Decision Support System (WFDSS) to thoroughly document strategic planning, comprehensive risk assessments, and the rationale behind critical decisions.
- **Effective Documentation and Monitoring:** Accurately document, record, and consistently monitor all required elements of the wildland fire program, including current reporting applications, while prioritizing safety, efficiency, and cost-effectiveness.
- **Community Strengthening:** Support Tribal enterprises and honor Tribal preferences in all wildland fire activities conducted on trust land.

2.3.4 LA JOLLA FIRE MANAGEMENT GUIDELINES

To ensure compliance with the BIA National Fire Plan directives, the La Jolla Band has developed the following guidelines for wildland fire management, incorporated within their draft Integrated Resource Management Plan (IRMP),

- **Cultural Value Integration:** Fire management practices will actively seek to incorporate and preserve cultural values to the maximum extent feasible.
- **Delegated Authority:** The Fire Management Officer, Assistant Fire Management Officer, or designated Fire Duty Officer holds the delegated authority for managing the Agency's fire program.
- **Suppression Priority:** Wildland fires will be managed with a suppression objective until fire threat levels subside.

- **Unified Incident Management:** When multiple wildland fires merge, they will be managed as a single incident, adapting strategies as the fire progresses across varying landscapes, fuel types, and weather conditions.
- **Risk and Complexity Assessment:** The Incident Commander will conduct a thorough risk and complexity assessment for every wildland fire.
- **Prescribed Fire Reassessment:** If a prescribed fire deviates from its explicitly stated resource objectives, it will undergo the same reassessment and response objective selection process as any other wildfire, considering its location, current conditions (fuels, weather, etc.), and relevant management considerations.
- **WFDSS Documentation:** The Wildland Fire Decision Support System (WFDSS) will be utilized to document all decisions and their rationale for managing fires that escape initial attack or are managed for extended periods to achieve multiple objectives. WFDSS also provides tools such as Energy Release Component (ERC) charts and fire behavior analysis to aid in decision-making throughout the incident lifecycle.
- **Strategic Objective-Driven Actions:** Specific wildland fire management actions will be based on their suitability to meet strategic objectives within the defined requirements, constraints, and guidelines. These actions typically encompass a range of tactical options, from basic monitoring to intensive management interventions.

3. FIRE MANAGEMENT UNIT CHARACTERISTICS

Fire Management Units (FMUs) and Management Action Areas (MAAs)

The La Jolla Indian Reservation's Wildland Fire Management Plan strategically divides the Reservation into distinct **Fire Management Units (FMUs)**. These FMUs are geographically defined areas characterized by shared overarching strategic fire management objectives (Map 6). These objectives are meticulously developed by considering a range of specific constraints, regulatory requirements, and practical implementation guidelines tailored to the unique characteristics of each unit. Section 3.1 of this plan clearly outlines the comprehensive criteria and factors used to define these FMUs based on overarching strategic fire management goals.

Building upon the broad framework established by the FMUs, Section 3.2, titled "**Management Action Areas (MAAs)**", provides a finer-scale refinement of fire management strategies within each FMU. MAAs are sub-unit designations within the larger FMUs, described by specific management constraints, operational requirements, and tactical guidelines that are particularly relevant to localized conditions. The delineation and management prescriptions for MAAs take into account a multitude of critical landscape characteristics, including fuel types and loading (as informed by fuel models and vegetation maps), topographic features (such as slope, aspect, and elevation derived from slope data), historical fire regimes (including frequency, size, burn severity, and patterns depicted on historical fire maps), the distribution of values at risk (including infrastructure locations and sensitive resource areas), access limitations, and other pertinent ecological and cultural considerations. These spatial relationships and data layers are visually represented on Map 6 and are further informed by other relevant data layers such as vegetation maps, slope data, and infrastructure locations within a Geographic Information System (GIS).

3.1 FIRE MANAGEMENT UNIT DEFINITIONS

The La Jolla Indian Reservation employs a tiered approach to wildland fire management, categorized into three distinct Fire Management Units (FMUs): the Asset Protection Unit (APU), the Resource Management Unit (RMU), and the Wildland Management Unit (WMU). These definitions are based on BIA spatial wildland planning terminology ([BIA Spatial FMU Definitions](#)). Each FMU is defined by specific fire management objectives, operational considerations, and is intrinsically linked to the unique landscape characteristics within its boundaries, including fuel types and loading, topography, and historical fire patterns. While digital maps are not readily available, their development is a top priority for the La Jolla Indian Reservation to enhance fire management planning and operations.

Initial Response and Assessment (Applicable Across All FMUs)

Upon the report of a wildland fire, the immediate priority across all FMUs is a comprehensive and rapid initial assessment (size-up) to inform the most effective and safe response. This assessment includes:

- **Probable Cause Determination:** Identifying the likely ignition source to guide prevention strategies and incident management actions.
- **Fire Spread Potential Assessment:** Evaluating the potential for fire growth based on observed fuel conditions, topographic influences, and current weather conditions.
- **Values at Risk Evaluation:** Identifying immediate and potential threats to life, property, infrastructure, sensitive ecological resources, and cultural sites, not only within the originating FMU but also in potentially affected adjacent FMUs.
- **Fire Behavior Analysis:** Analyzing current and predicted fire behavior by integrating real-time observations (flame length, rate of spread, smoke column development) with short-term and extended weather forecasts (wind speed and direction, temperature, relative humidity).
- **Access and Safety Analysis:** Identifying potential access routes and safety hazards for suppression personnel, including terrain limitations, hazardous materials, and escape routes.

Suppression Tactics (Applicable Across All FMUs)

The selection and implementation of suppression tactics will prioritize minimizing environmental impact while effectively containing the fire.

- **Initial Efforts:** During the initial attack phase, indirect attack tactics (minimizing ground disturbance) will be prioritized when feasible and tactically sound. This includes utilizing natural fire barriers (e.g., rock outcroppings, water bodies), existing roads and trails as control lines, and strategically positioning suppression resources to contain fire spread without significant ground disturbance.
- **Direct Attack:** When necessary to achieve containment objectives, direct attack tactics will be implemented. These may include the application of water or fire retardant (ground or aerial), strategic backfiring, and the construction of fire control lines using heavy equipment (e.g., bulldozers, excavators) and hand crews. The selection of specific direct attack methods will be carefully considered based on the unique characteristics of the affected FMU, including slope, fuel type and loading, proximity to values at risk, and a thorough assessment of potential resource damage (e.g., soil compaction, vegetation removal, cultural site disturbance) resulting from suppression activities.

3.1.1 APU - ASSET PROTECTION UNIT: WILDLAND URBAN INTERFACE (FURTHER DETAILED IN SECTION 3.2.1)

Primary Objective: The paramount objective within the APU is the unwavering protection of life, property, critical infrastructure, and high-value resources, ensuring firefighter safety. Wildland fire within the APU is generally considered undesirable. A central tenet is the establishment of fire-adapted communities through comprehensive fuel management strategies, including ensuring defensible space, promoting fire-resistant building materials, and implementing robust public education programs.

Primary Strategic/Operational Considerations:

- Highest priority for the allocation of available suppression forces will be given to fires threatening sites within the APU over fires in the RMU or WMU.
- Full perimeter control will receive the highest priority for suppression resources. Confinement and fire use will be limited and may be utilized in rare, site-specific circumstances with documented direction from the Line Officer (e.g., confining fire to treat fuels after structures are secure or if fire is burning away from structures towards the RMU).
- Fuel treatment efforts will be prioritized over the RMU or WMU to create defensible space and increase landscape resiliency, focusing on areas along evacuation routes, around critical infrastructure, and adjacent to communities and individual structures.

3.1.2 RMU - RESOURCE MANAGEMENT UNIT: NON-WUI

Wildland Urban Interface (Further detailed in Section 3.2.2)

Primary Objective: The primary objective within the RMU is to balance the protection of life, property, infrastructure, and identified high-value resources with the promotion of fire as a desirable and essential ecosystem component, always prioritizing firefighter safety. High-value resources may include sensitive habitats and culturally significant areas. A key strategy is the coordinated implementation of fuel treatments with planned strategies for managing unplanned ignitions to protect values at risk and enhance long-term landscape resiliency.

Primary Strategic/Operational Considerations:

- Response to wildland fire within the RMU will be prioritized secondary to the APU but primary to the WMU.
- Emphasis will be on perimeter control where needed to protect specific values at risk, and confinement/point protection elsewhere, based on clearly defined operational thresholds considering potential fire behavior, resource values at risk, firefighter safety, and ecological objectives.
- The use of Wildland Fire for Resource Benefit (WFRB) to protect, maintain, and enhance natural and cultural resources is available within defined weather and fuel moisture conditions, with a thorough, documented decision analysis and support process.
- Fuel treatment efforts will be prioritized within the RMU to strategically increase opportunities for employing confinement and point protection strategies near values at risk and promote landscape resiliency. Areas with high fuel hazard and/or strategic ecological locations will be

prioritized for fuel reduction projects, especially at pre-planned strategically located management action points (SLMAPs).

- Effective Interagency Cooperator agreements must be in place to determine the management of wildfire threats occurring on or off trust lands, outlining roles, responsibilities, communication protocols, and resource sharing.

3.1.3 WMU - WILDLAND MANAGEMENT UNIT

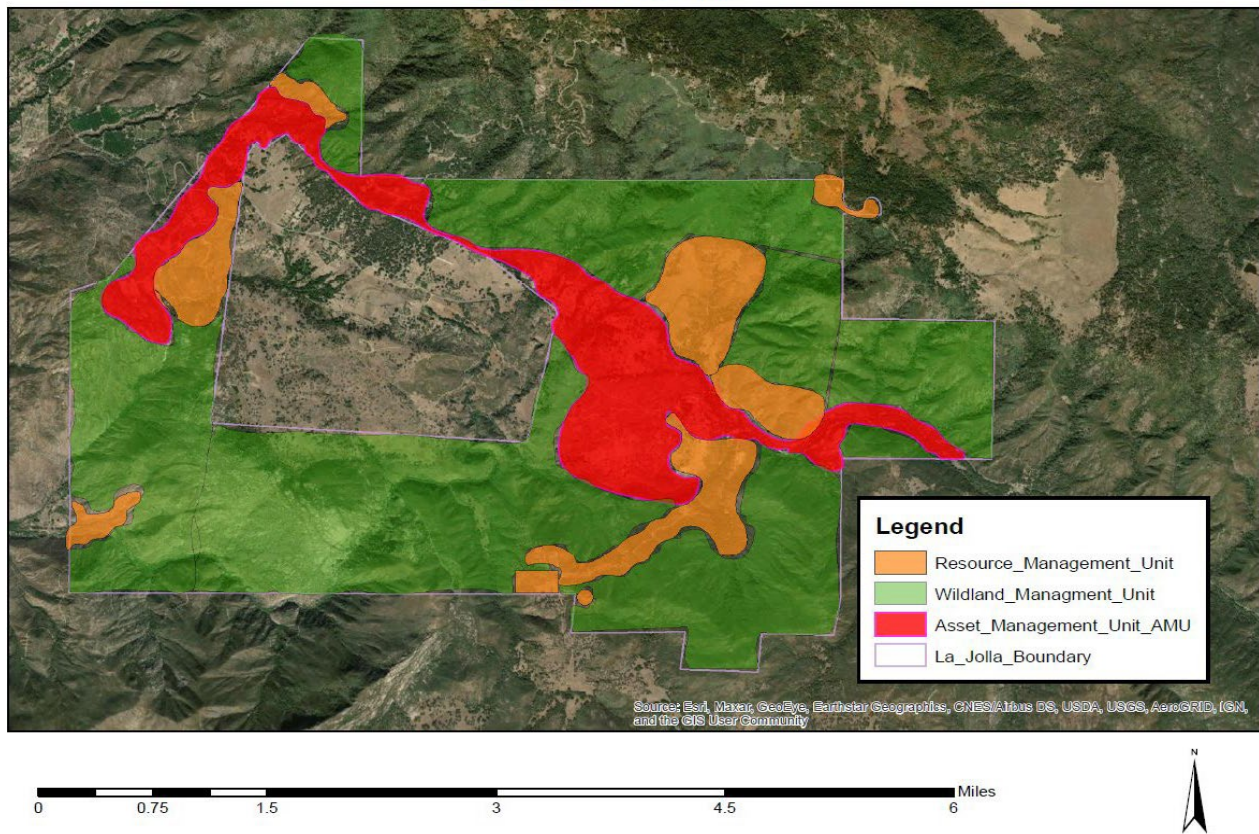
Further detailed in Section 3.2.3

Primary Objective: Within the WMU, and with an unwavering emphasis on firefighters and public safety, the primary objective is to strategically utilize wildland fire to protect, maintain, and enhance natural and cultural resources. This involves actively enabling fire to function in its natural ecological role and working towards the maintenance of traditional fire regimes where ecologically appropriate and culturally significant. Decision-making will involve a careful assessment of the costs and associated environmental impacts of suppression actions weighed against the values to be protected, while concurrently considering the potential ecological benefits, resource objectives, and firefighter and public safety.

Primary Strategic/Operational Considerations:

- All suppression strategies will be utilized as needed (based on operational thresholds) with primary consideration for resource values and objectives.
- The use of Wildland Fire for Resource Benefit (WFRB) is routinely available with a documented decision analysis and support process.
- Efforts will focus on minimizing adverse effects of fire suppression.
- Short- and long-term cost-effectiveness and efficiencies will be realized.
- Fuel treatment efforts will be prioritized within the WMU to increase opportunities to use point protection as a strategy near values at risk and promote landscape resiliency.
- Effective Interagency Cooperator agreements must be in place to determine the management of wildfire threats occurring on or off trust lands.

Fire Management Units



Map 6 Management Units

3.1.4 PRIMARY STRATEGIC/OPERATIONAL CONSIDERATIONS (OVERARCHING FOR ALL FMUS)

These overarching considerations provide the guiding principles for fire management across all Fire Management Units (FMUs), including the WMU:

- Prioritize Ecological Function:** Employ all available strategies, with a central focus on resource values and objectives, to utilize fire as an ecological tool where appropriate across all FMUs. This includes a thorough consideration of the historical fire regime specific to each FMU, with the aim of promoting long-term ecosystem health, biodiversity, and resilience. The WMU will particularly emphasize restoring natural fire frequencies and intensities.
- Proactive Wildfire Consideration:** Routinely and proactively consider the potential use of unplanned ignitions (wildfires) as a management tool within clearly defined parameters, supported by robust documented decision analysis and approval processes. These parameters will include specific and real-time assessments of weather conditions, fuel moisture levels, ignition location, topography, predicted fire behavior, and proximity to identified values at risk. A transparent and well-defined chain of approval will be established for managing unplanned

ignitions, with the WMU as the primary area where this strategy is actively pursued for resource benefit.

- **Minimize Suppression Impacts:** Implement suppression tactics across all FMUs that actively minimize adverse environmental impacts, such as soil erosion, sedimentation, damage to vegetation, and disturbances to wildlife. Suppression efforts will prioritize methods that reduce ground disturbance (e.g., minimal impact suppression tactics - MIST), protect riparian areas and water quality, and avoid sensitive wildlife habitats during critical life stages (e.g., breeding seasons).
- **Promote Cost-Effectiveness and Efficiency:** Strive for cost-effectiveness and efficiency in all fire management activities, encompassing both suppression and fuels management operations across all FMUs. Resource allocation decisions will be informed by a comprehensive cost-benefit analysis that considers the long-term ecological and economic implications of different management actions in relation to the values being protected and the ecological objectives being pursued.
- **Strategic Fuel Treatment Prioritization:** Strategically prioritize fuel treatments in areas where they will most effectively reduce overall fire risk, enhance landscape resiliency across all FMUs, and create opportunities for managing wildfires for resource benefit, particularly in the WMU. Fuel treatment planning will utilize advanced risk assessment tools, spatial analysis, and ecological data to identify high-hazard areas and strategically place treatments to achieve specific ecological and protection objectives within each FMU.
- **Foster Interagency Cooperation:** Foster and maintain strong interagency cooperation for the seamless management of wildfire threats that may occur on or extend off Trust lands. This will involve regular meetings, joint planning sessions, shared training exercises, and the development of integrated operational plans with neighboring federal, state, and local agencies to ensure a coordinated and effective response across all FMUs.
- **Address Post-Fire Effects:** Proactively consider the potential long-term ecological and social impacts of wildfires in all management decisions across all FMUs. Post-fire management plans will address immediate needs such as erosion control and hazard tree mitigation, as well as long-term objectives including habitat restoration, invasive species management, and the assessment of potential impacts to cultural resources. The WMU will place a significant emphasis on understanding and managing the ecological consequences of fire.

3.2 MANAGEMENT ACTION AREAS

This section outlines specific management considerations for each of the defined Management Action Areas (MAAs) within the three Fire Management Units (FMUs), including detailed treatment prioritization based on various land classifications (such as wildland-urban interface, fire regime and condition class, fuel models, proximity to sensitive resources, etc.).

Fuel Reduction Methods (Applicable Across All FMUs)

The selection and effectiveness of any fuel reduction method are highly dependent on specific site conditions, including vegetation type, fuel loading, topography, climate, fire history, soil type, and the presence of sensitive resources. Detailed site assessments will be conducted prior to implementation to ensure appropriateness and effectiveness. All treatments have the potential for both positive and negative ecological impacts, necessitating careful planning, consideration of ecological factors, and implementation of mitigation measures to maximize benefits (e.g., promoting native diversity,

improving habitat, restoring fire regimes) and minimize negative impacts. Safety of personnel and the public is paramount throughout all phases, requiring qualified professionals, appropriate training and equipment, and comprehensive safety plans. Fuel reduction is an ongoing process requiring regular monitoring and maintenance to ensure continued effectiveness and inform adaptive management strategies.

The following methods may be employed for reducing ladder fuels (vegetation allowing fire to climb from the ground to tree crowns, including shrubs, small trees, dead branches, and lower limbs):

- **Mechanical Treatments:** Physical removal or alteration of vegetation.
 - o **Hand-cutting:** Selective removal using manual tools (chainsaws, brush cutters, hand tools). Suitable for sensitive areas, steep slopes, or high cultural resource value areas where larger equipment is inappropriate.
 - o **Mowing:** Reduction of height and density of grasses and shrubs using mowers. Effective in grasslands, meadows, and open shrublands to reduce fine fuels and limit fire spread.
 - o **Chipping:** Processing woody debris into smaller chips. Chips can be removed or used as mulch for soil health, erosion control, and weed suppression.
- **Prescribed Fire:** Controlled application of fire under specific conditions to achieve resource objectives, including reducing ladder and surface fuels and promoting fire-adapted species. Requires detailed burn plans, smoke management plans, safety protocols, and consideration of ecological goals and potential impacts.
- **Chemical Treatments:** Limited and targeted application of EPA-approved insecticides and herbicides to control specific insect outbreaks or undesirable plant growth contributing to ladder fuels or overall fuel loading. Requires thorough environmental review, adherence to label instructions, BMPs, and consideration of non-target species and water quality.
- **Cultural Burning:** Application of fire using traditional techniques and knowledge for specific cultural or ecological purposes. Requires close collaboration with Tribal elders and TEK holders, ensuring cultural appropriateness, ecological soundness, and integration of scientific understanding. Specific protocols will be developed in consultation with relevant Tribal members.
- **Forest Thinning:** Selective removal of trees to reduce stand density, improve forest health, increase light penetration, and disrupt vertical fuel continuity, reducing ladder fuels and crown fire potential. Prescriptions will be tailored to forest types, age classes, and management objectives, considering tree species, stand density, desired future conditions, and wildlife habitat impacts.

This detailed description of fuel treatment strategies will inform the Environmental Assessment (EA) by providing a comprehensive overview of potential actions and their associated effects. Site-specific treatments will be further detailed in project-specific EAs as necessary.

3.2.1 FMU: All General Requirements

These overarching requirements apply to all Fire Management Units (FMUs), ensuring a consistent foundation for fire management activities across the La Jolla Indian Reservation:

- **Regulatory Compliance:** All fire management activities will strictly comply with all applicable local, state, and federal regulations, including comprehensive smoke management plans,

adherence to air quality regulations, obtaining necessary permits for prescribed fire, and meeting all other environmental and safety standards.

- **Cultural Resource Protection:** The protection of all cultural sites is a paramount priority. All fire management activities will meticulously adhere to the Tribe's Historic Preservation Plan and established protocols for the identification, avoidance, and protection of cultural resources. Pre-activity surveys and consultation with the Tribal Historic Preservation Office (THPO) will be standard practice.
- **Community Engagement and Communication:** Open, transparent, and timely communication with the Tribal Council and the broader community is essential throughout all fire events, including planning and implementation of fuel treatments and wildfire incidents. A detailed communication plan will be developed and implemented to ensure accurate and timely information sharing with Tribal leadership, community members, and relevant stakeholders, outlining communication channels, key contacts, and dissemination protocols.
- **Cross-Boundary Fire Corridor Assessment:** Proactive evaluation of potential fire corridors that may transcend management unit boundaries is crucial. Special attention will be given to areas exhibiting elevated fire risk due to historical fire regimes, current vegetation condition classes influenced by drought, and prevailing relative humidity. Rigorous analysis of fire history data, vegetation mapping, and climate information will be employed to identify and prioritize the management of these potential fire corridors through targeted fuel treatments and strategic suppression planning.
- **Advanced Fuel Modeling and Analysis:** The fire management program is committed to pursuing the acquisition, analysis, and integration of the best available and emerging fuel modeling science and technology. This will provide high-quality data for annual re-evaluations of fire risk and for on-demand fire behavior predictions during incidents, enhancing situational awareness and informed decision-making.

3.2.2 FMU: APU - Asset Protection Unit

Primary Focus: Wildland-Urban Interface (WUI): Within the Wildland-Urban Interface (WUI), the overarching focus is to prioritize the protection of life, property, and critical infrastructure from the threat of wildland fire. All management actions within the WUI will be guided by this fundamental principle.

Suppression Strategies (APU):

- **Emphasize Aggressive Full Perimeter Control:** Tactical suppression operations within the WUI will prioritize the rapid and safe establishment of control lines to minimize fire spread and protect structures.
- **Restrict Aerial Retardant Use on Structures:** The application of aerial retardant directly on homes and dwellings will be restricted to situations where it is absolutely necessary to protect human life or prevent the imminent loss of structures. Prioritization will be on protecting life first, followed by preventing structure loss, with careful consideration given to the potential environmental impacts of retardant application in these sensitive areas.
- **Minimize Heavy Equipment Use Near Structures:** The use of heavy equipment, particularly dozers, in close proximity to homes and infrastructure will be minimized to avoid potential damage to utilities, property, and the landscape. Alternative suppression methods, such as hand crews and water application, will be prioritized in these areas.

Fuel Treatments (APU):

- **Prioritize Defensible Space and Landscape Resilience:** Fuel treatment efforts within the WUI will be strategically prioritized to create effective defensible space zones immediately surrounding structures and to enhance the overall fire resilience of the landscape within and adjacent to the community. Clearly defined and enforced defensible space standards will be implemented and actively maintained.
- **Implement Targeted Fuel Reduction Measures:** Comprehensive fuel reduction measures will be implemented throughout the WUI, focusing on the critical removal and reduction of ladder fuels, the removal of dead and downed woody material, and the creation and maintenance of defensible space around all structures. Specific treatment prescriptions will be tailored to the dominant vegetation types, topography, and the proximity of fuels to structures.
- **Employ Integrated Treatment Methods:** A variety of fuel treatment methods will be considered and implemented, including mechanical treatments (e.g., hand thinning, mowing, chipping), prescribed fire (where appropriate and safe within the WUI), and chemical treatments (used judiciously and in compliance with all regulations and environmental considerations). The selection of methods will be based on effectiveness, cost-efficiency, potential environmental impacts, and community acceptance.

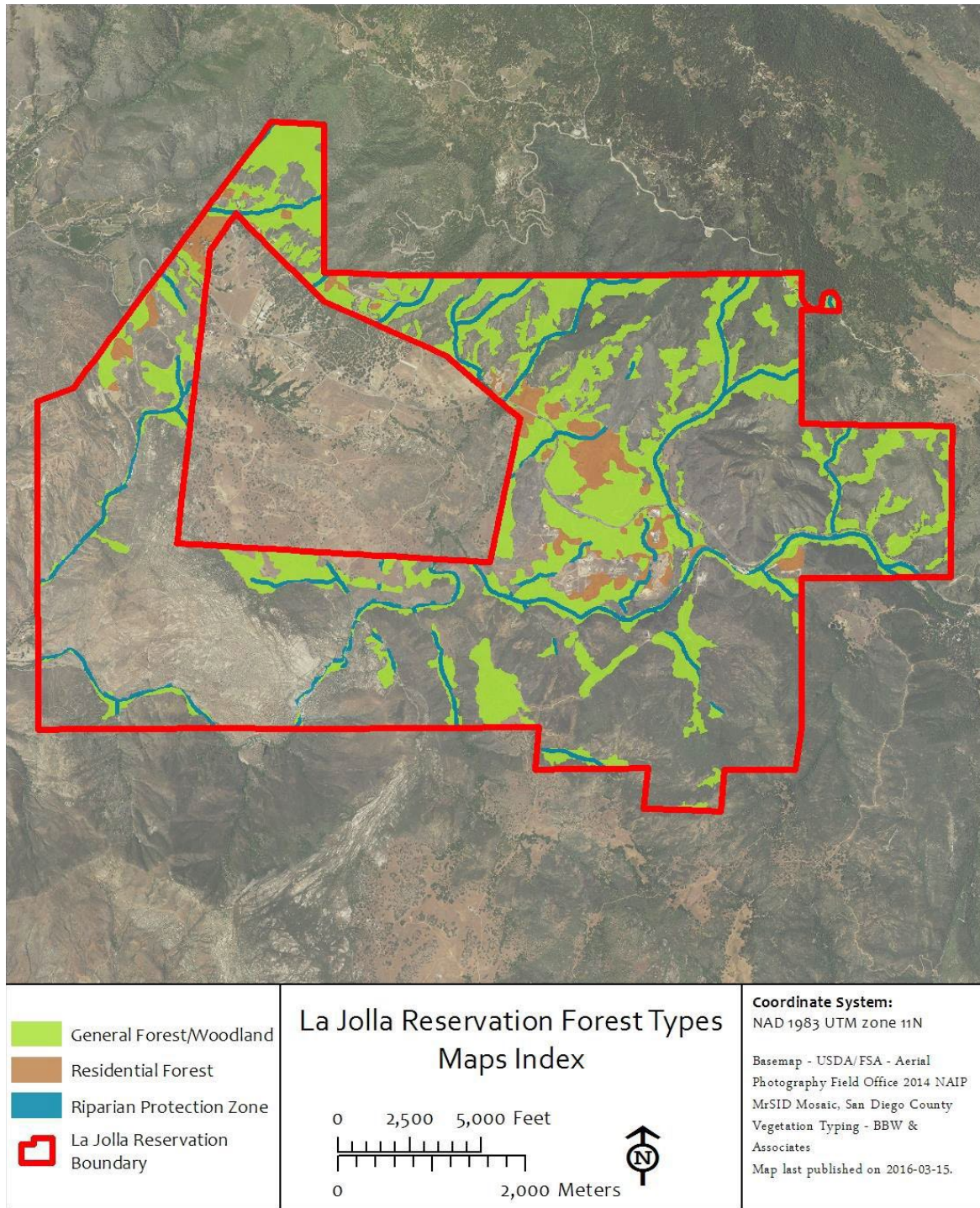
3.2.3 FMU: RMU - Resource Management Unit**Suppression Strategies (RMU):**

- **Prioritized Perimeter Control Based on Values at Risk:** Suppression efforts within the Resource Management Unit (RMU) will prioritize perimeter control in areas where specific high-value resources (ecological, cultural, or economic) are threatened or potentially at risk from fire spread. The level of control effort will be directly proportional to the identified values at risk and the potential for the fire to impact those values or spread beyond acceptable boundaries.
- **Strategic Use of Confinement and Point Protection:** Confinement and point protection tactics will be strategically utilized in areas where full perimeter control is not essential for protecting high-value resources or where allowing fire to play its natural role is consistent with resource management objectives. Clear and objective criteria will be established to guide the decision-making process for employing these strategies, based on thorough risk assessments, resource objectives, predicted fire behavior, and firefighter safety considerations.
- **Minimize Impacts on Sensitive Resources:** All suppression activities within the RMU will incorporate measures to minimize impacts on cultural sites, traditional use areas, sensitive habitats, streams, and other critical environmental resources. Suppression tactics will prioritize low-impact methods, and resource advisors will be consulted to identify and protect sensitive areas during incident operations.

Fuel Treatments (RMU):

- **Strategic Fuel Treatments Near Values at Risk:** Fuel treatment efforts in the RMU will be strategically prioritized to reduce fire risk in areas immediately adjacent to identified high-value ecological and cultural resources. This includes the implementation of strategic fuel breaks, thinning projects, and other fuel reduction measures designed to modify potential fire behavior and provide firefighters with safer and more effective control opportunities near these sensitive areas such as forested areas (Map 6)

- **Protection of Cultural and Archaeological Sites:** All fuel treatment activities within the RMU will be planned and executed to minimize any potential impacts on cultural sites, archaeological sites, streams, and water bodies. Comprehensive archaeological surveys and environmental assessments will be conducted prior to the initiation of any fuel treatment project to identify and implement appropriate avoidance or mitigation measures.
- **Consideration of Threatened and Endangered Species:** Fuel treatment planning within the RMU will explicitly consider the presence and specific management requirements of federally and state-listed Threatened and Endangered Species and their critical habitats. Treatment prescriptions will be designed to protect and, where possible, enhance habitat for these species.
- **Minimizing Air and Water Quality Impacts:** Best Management Practices (BMPs) will be rigorously implemented during all fuel treatment activities to effectively control erosion and sedimentation, thereby minimizing impacts on air and water quality. For prescribed fire operations, comprehensive smoke management plans will be developed and strictly adhered to.
- **Coordination with Adjacent Agencies:** Collaborative fuel treatment projects and planning efforts with adjacent federal, state, and private landowners will be actively pursued where such cooperation can enhance the effectiveness of fuel management across jurisdictional boundaries and contribute to landscape-scale resilience.



1204

1205 **Map 7. Forest Type**

1206

4. WILDLAND FIRE OPERATIONAL GUIDANCE

4.1 LJRFD ANNUAL OPERATING PLAN (AOP) - 2025

Reference: This Annual Operating Plan (AOP) is developed in accordance with the guidelines and best practices outlined in the Bureau of Indian Affairs (BIA) Wildland Fire Management Program Guide ("Red Book") and reflects the specific needs and resources of the La Jolla Reservation Fire Department (LJRFD). This document serves as a critical reference for all LJRFD personnel and relevant partner agencies throughout the 2025 operating year.

A current copy of this AOP will be maintained and readily accessible at the La Jolla Reservation Fire Department.

This Annual Operating Plan (AOP) outlines the operational procedures, resource allocation, and management direction for the La Jolla Reservation Fire Department for the 2025 fire season. It aims to ensure the effective and efficient prevention, preparedness, response, and suppression of wildland and structural fires within the La Jolla Indian Reservation, protecting life, property, cultural resources, and natural resources. This plan is a dynamic document and may be amended as conditions warrant, with all revisions communicated to relevant personnel.

4.1.1 PERSONNEL AND CONTACT INFORMATION

This section provides key contact information for LJRFD personnel and essential partner agencies that will be updated as needed in the current year's annual plan.

- **La Jolla Reservation Fire Department (LJRFD):**
 - o **Fire Chief:** [Insert Name and Title]
 - Office Phone: [Insert Phone Number]
 - Cell Phone: [Insert Phone Number]
 - Email: [Insert Email Address]
 - o **Assistant Fire Chief/Operations Chief:** [Insert Name and Title]
 - Office Phone: [Insert Phone Number]
 - Cell Phone: [Insert Phone Number]
 - Email: [Insert Email Address]
 - o **Fire Marshal/Prevention Officer:** [Insert Name and Title]
 - Office Phone: [Insert Phone Number]
 - Cell Phone: [Insert Phone Number]
 - Email: [Insert Email Address]
 - o **Captains/Engine Bosses:** [Insert Names and Titles]
 - Cell Phone(s): [Insert Phone Number(s)]
 - Email(s): [Insert Email Address(es)]
 - o **Firefighters/Crew Members:** [List names and contact information as appropriate]
 - o **Administrative Staff:** [Insert Name and Title]
 - Office Phone: [Insert Phone Number]
 - Email: [Insert Email Address]
- **Tribal Emergency Management:** [Insert Name and Title]
 - o Office Phone: [Insert Phone Number]

- 1247 o Cell Phone: [Insert Phone Number]
- 1248 o Email: [Insert Email Address]
- 1249 • **Tribal Police Department Dispatch:**
- 1250 o Emergency Phone: 911
- 1251 o Non-Emergency Phone: [Insert Phone Number]
- 1252 • **La Jolla Tribal Government:** [Insert Key Contact Person and Information]
- 1253 • **Indian Health Council (IHC):** [Insert Key Contact Person and Information]
- 1254 • **Bureau of Indian Affairs (BIA) - Southern California Agency Fire Management:**
- 1255 o Dispatch Phone: [Insert Phone Number]
- 1256 o Agency Fire Management Officer (AFMO): [Insert Name and Title and Contact Information]
- 1257
- 1258 • **CAL FIRE - San Diego Unit (if applicable Memorandum of Understanding exists):**
- 1259 o Dispatch Phone: [Insert Phone Number]
- 1260 o Unit Duty Officer: [Insert Contact Information]
- 1261 • **Local Cooperating Agencies (e.g., neighboring fire departments):** [List key contacts and information]
- 1262

1263 4.1.2 EQUIPMENT RESOURCES

1264 This section details the available equipment resources of the LJRFD.

- 1265 • **Fire Engines:**
- 1266 o Engine [Number/Designation]: [Type (e.g., Type III, Type VI)], [Water Capacity], [Pump Capacity], [Personnel Capacity], [Status (In Service, Out of Service)], [Location]
- 1267 o Engine [Number/Designation]: [Type], [Water Capacity], [Pump Capacity], [Personnel Capacity], [Status], [Location]
- 1268
- 1269 • **Water Tenders:**
- 1270 o Tender [Number/Designation]: [Water Capacity], [Status], [Location]
- 1271
- 1272 • **Ambulance/Medical Units:**
- 1273 o Ambulance [Number/Designation]: [Type (ALS/BLS)], [Status], [Location]
- 1274 • **Command/Staff Vehicles:**
- 1275 o [Vehicle Type/Designation]: [Status], [Assigned To/Primary Use], [Location]
- 1276 • **Specialized Equipment:**
- 1277 o [Equipment Type (e.g., Chainsaws, Hand Tools, Radios, Thermal Imagers)]: [Quantity], [Status], [Location]
- 1278 o [Equipment Type (e.g., Portable Pumps, Hose)]: [Quantity], [Status], [Location]
- 1279
- 1280 • **Communication Equipment:**
- 1281 o [Radio Type (e.g., VHF, UHF, 800 MHz)]: [Quantity], [Status]
- 1282 o Satellite Phones: [Quantity], [Status], [Location]
- 1283 o Mobile Data Terminals (MDTs): [Quantity], [Status]
- 1284 • **Personal Protective Equipment (PPE):** [General overview of available PPE for wildland and structural firefighting]
- 1285

1286 **All equipment will be maintained in accordance with manufacturer recommendations and relevant**
 1287 **safety standards. Regular maintenance schedules and checks will be conducted and documented.**

1288 4.2.3 ACTIONS UPON FIRE IGNITION

This section details the critical sequence of actions that will be immediately implemented upon notification of a wildland fire ignition within or potentially impacting the La Jolla Indian Reservation. A swift, coordinated, and decisive response is paramount to ensuring the safety of the community and responding personnel, minimizing resource damage, and achieving effective fire suppression.

Notification:

Timely and accurate notification of a fire ignition is the first crucial step in the response process. Fires may be reported through various channels, including:

- **Tribal Police Department Dispatch:** Community members or responding personnel may report fires by calling the Tribal Police Department's emergency line (911) or their non-emergency telephone number. Tribal Police Dispatch serves as a primary point of contact for initial fire reports.
- **Direct Calls to LJRFD Personnel:** Individuals may directly contact on-duty or on-call La Jolla Reservation Fire Department (LJRFD) personnel via their assigned radio, pager, or phone numbers.
- **Bureau of Indian Affairs (BIA) Dispatch:** Fires may be reported directly to the BIA Dispatch Center, particularly those observed by BIA personnel or reported through federal channels. BIA Dispatch plays a critical role in coordinating interagency responses and resource allocation.
- **Other Cooperating Agencies:** Fires may also be reported by personnel from neighboring fire departments (e.g., CAL FIRE, Valley Center Fire Protection District), federal agencies (e.g., US Forest Service), or other cooperating entities as outlined in existing mutual aid agreements.

Dispatch and Initial Response Protocol:

Upon receiving a fire report, Tribal Police Dispatch will immediately initiate the following procedures:

- **Information Gathering:** Dispatch personnel will promptly gather essential information from the reporting party, including the precise location of the fire (using address, landmarks, or GPS coordinates if possible), an initial estimate of the fire's size and behavior (e.g., smoldering, actively burning in grass, spreading to brush), the type of fuel involved (e.g., grass, brush, timber), any immediate threats to life, property, or critical resources, and the name and contact information of the reporting party.
- **Alerting LJRFD Personnel:** Dispatch will immediately alert the appropriate LJRFD personnel based on established protocols and the severity of the reported incident. This notification will be disseminated via [Specify method(s), e.g., two-way radio system on designated fire channels, alphanumeric pagers with detailed incident information, cellular phone alerts via SMS or dedicated alerting applications]. The alert will include all pertinent information gathered from the initial report.
- **Information Relay:** Dispatch will relay all gathered information to the responding LJRFD personnel and, if the situation warrants or as per established protocols, to BIA Dispatch and other relevant agencies. This ensures that all responding units have a clear understanding of the situation prior to arrival.

LJRFD personnel will respond to fire ignitions according to established Standard Operating Procedures (SOPs) and the assessed level of the reported incident. The initial response will typically involve the

deployment of **[Outline initial apparatus and personnel deployment based on pre-determined response matrices, considering factors such as fire location (e.g., on-Reservation vs. off-Reservation but threatening), time of day, and initial report severity. Examples: a Type VI engine with a crew of 3 for a small grass fire, a Type III engine with a full crew and a Battalion Chief for a larger brush fire with potential for spread]**.

The first arriving unit on scene will immediately undertake the following critical actions:

- **Size-Up:** Conduct a rapid and thorough assessment of the incident, including confirming the fire's location, verifying its size and behavior, identifying the fuel type(s) involved, assessing the surrounding terrain and access, identifying any immediate threats to life, property, or critical resources, and evaluating potential hazards to responding personnel.
- **Establishing Initial Command:** If no designated officer (e.g., Captain, Battalion Chief) is immediately present, the highest-ranking or most experienced arriving firefighter will establish Initial Command, assuming responsibility for the incident. This includes identifying themselves as the Incident Commander (IC) and establishing a command post location.
- **Initial Attack:** Initiate immediate fire suppression actions based on the initial size-up and available resources. This may involve direct attack with water or hand tools to contain the fire's spread.
- **Providing a Situation Report:** The initial IC will promptly transmit a concise situation report to dispatch and any other responding units. This report will include confirmation of the fire's location, a brief description of the fire's size and behavior, any immediate threats identified, the initial actions being taken, and any immediate resource needs.

Communication:

Effective and continuous communication is vital throughout the fire incident.

- **Primary Radio Frequencies/Channels:** Initial and ongoing tactical communications will primarily utilize the designated **[Specify primary radio frequencies/channels used for wildland fire operations within the LJIR, including any interagency channels]**. All responding personnel will ensure their radios are operating on the correct channel and maintain clear and concise communication.
- **Establishment of Incident Command Post (ICP) and Communications Unit Leader:** As the incident escalates in complexity, a formal Incident Command Post (ICP) will be established in a safe and strategic location. If the incident warrants, a designated Communications Unit Leader (COML) will be assigned to manage all incident communications, ensuring efficient and reliable information flow. These actions will follow established Incident Command System (ICS) procedures.
- **Regular Situation Reports:** The Incident Commander (or designated Public Information Officer - PIO for larger incidents) will provide regular situation reports to **[Specify who receives these reports and the standard frequency, e.g., Tribal Police Dispatch every 15-30 minutes during active fire spread, BIA Dispatch hourly, Tribal Council as needed based on incident severity]**. These reports will include updates on fire size and behavior, containment progress, resource status, any changes in threats, and anticipated needs.

Escalation and Resource Ordering:

A continuous assessment of fire behavior, potential for spread, and evolving resource needs will be conducted by the Incident Commander and other key personnel.

- **Requests for Additional Resources:** Requests for additional resources, including personnel (e.g., additional fire crews, overhead team members), equipment (e.g., additional engines, dozers, water tenders), and aircraft (e.g., helicopters, air tankers), will be made through the established resource ordering procedures. The primary point of contact for external resource ordering will typically be **[Specify the primary resource ordering point, e.g., BIA Dispatch via established ordering channels (ROSS - Resource Ordering and Status System), direct request to pre-identified mutual aid partners]**. All resource requests will follow the established chain of command.
- **Trigger Points for Requesting Additional Resources:** The decision to request additional resources will be based on a comprehensive evaluation of several critical factors, including:
 - o Current and predicted fire size and rate of spread.
 - o Type and condition of the burning fuel.
 - o Topographical features and their influence on fire behavior.
 - o Immediate and potential threats to values at risk (e.g., structures, critical infrastructure, sensitive natural or cultural resources).
 - o Current and projected availability of local LJRFD resources.
 - o Anticipated duration and complexity of the incident.
 - o Safety of responding personnel.
 - o Established trigger points within pre-determined incident action plans or agency guidelines.

Interagency Coordination:

Effective coordination with the Bureau of Indian Affairs (BIA), CAL FIRE, and other cooperating agencies is essential for a successful and unified response, particularly when incidents cross jurisdictional boundaries or require significant external resources.

- **Coordination Protocols:** Coordination will occur as outlined in existing formal mutual aid agreements, cooperative agreements, and established protocols between the La Jolla Band of Luiseño Indians and these partner agencies. This includes pre-determined communication channels, resource sharing arrangements, and jurisdictional responsibilities.
- **Unified Command:** In situations where multiple agencies have jurisdictional responsibility for the incident or when significant resources from multiple agencies are involved, a Unified Command (UC) structure will be established. Unified Command brings together the Incident Commanders from all participating agencies to jointly manage the incident, ensuring a coordinated and collaborative approach to incident objectives and resource allocation. The establishment and operation of Unified Command will adhere to established Incident Command System (ICS) principles.

4.2.4 MANAGEMENT DIRECTION

This section outlines the dynamic management direction that will guide wildland fire management activities on the La Jolla Indian Reservation. This direction is adaptive and will be strategically adjusted based on a continuous assessment of critical environmental factors, current and predicted fire activity

levels, and the availability and commitment status of essential resources. This adaptive management approach ensures that the LJRFD is proactively prepared to respond effectively and efficiently to the evolving wildfire risk landscape.

Burning Indices and Preparedness Levels:

The La Jolla Reservation Fire Department (LJRFD) will diligently monitor relevant burning indices to gain a comprehensive understanding of current and potential fire behavior. This monitoring will primarily focus on recognized systems such as the **Fire Danger Rating System (FDRS)** and the **National Fire Danger Rating System (NFDRS)**. Data for these indices will be obtained and analyzed through [Specify data sources, e.g., Remote Automated Weather Stations (RAWS) on and near the Reservation, National Weather Service (NWS) forecasts, online fire weather information portals (e.g., Meso West), Tribal weather monitoring systems if applicable] and will be assessed with a frequency of [Specify frequency of monitoring, e.g., daily, twice daily during peak fire season, hourly during elevated risk periods]. This continuous monitoring will provide critical insights into fuel moisture levels, atmospheric stability, and other meteorological factors influencing fire ignition and spread potential.

Based on the real-time analysis of these burning indices, coupled with a thorough evaluation of current and predicted weather conditions (including temperature, wind speed and direction, humidity, and precipitation forecasts), existing fuel moisture levels across various vegetation types, prevailing fire activity within the local and broader geographic region, and the current availability and commitment status of LJRFD personnel and equipment, **Preparedness Levels (PL)** will be dynamically established and adjusted. These Preparedness Levels serve as a standardized system for communicating the level of risk and the corresponding readiness posture of the LJRFD. The following outlines the anticipated Preparedness Levels and their associated proactive and reactive actions:

- **Preparedness Level 1 (Low):** Burning indices are low, and weather conditions pose a minimal fire risk. Fire activity in the region is minimal.
 - **Associated Actions:** Routine staffing levels maintained. Standard equipment checks and maintenance schedules adhered to. Public awareness messaging focused on general fire safety practices. Burning permits issued according to standard procedures.
- **Preparedness Level 2 (Moderate):** Burning indices are increasing, and weather conditions indicate a moderate fire risk. Local or regional fire activity is slightly elevated.
 - **Associated Actions:** Increased monitoring of burning indices and weather forecasts. Readiness checks of all fire suppression resources. Review of incident action plans. Public awareness messaging emphasizing increased vigilance and responsible outdoor fire use. Potential limitations on certain types of burning permits.
- **Preparedness Level 3 (High):** Burning indices are high, and weather conditions present a significant fire risk. Moderate to high fire activity is occurring locally or regionally, potentially straining resources.
 - **Associated Actions:** Increased staffing levels implemented as per pre-determined agreements or protocols. Enhanced equipment readiness checks, and deployment strategies reviewed. Active dissemination of targeted public safety information and warnings. Restrictions on all non-essential burning permits and potential implementation of fire restrictions (e.g., limitations on campfires). Increased patrols in high-risk areas. Coordination with mutual aid partners and BIA Dispatch to assess regional resource availability.

- **Preparedness Level 4 (Very High):** Burning indices are very high, and weather conditions are conducive to rapid fire spread and extreme fire behavior. High fire activity is occurring locally or regionally, with a potential for significant resource shortages.
 - o **Associated Actions:** Maximum available staffing deployed and strategically positioned. All equipment placed on high alert and readily deployable. Implementation of strict fire restrictions, potentially including closures of public lands. Intensive public outreach and warnings regarding extreme fire danger. Proactive pre-positioning of resources in high-risk areas. Close coordination with mutual aid partners and BIA Dispatch for potential resource augmentation and support.
- **Preparedness Level 5 (Extreme):** Burning indices are at their highest levels, and weather conditions are creating an extreme and potentially uncontrollable fire environment. Multiple large and significant fires are burning locally and regionally, with severe resource limitations.
 - o **Associated Actions:** Focus on life safety and protection of critical infrastructure. Maximum available resources committed to ongoing incidents. Implementation of widespread fire closures and evacuations as necessary. Continuous and direct communication with the Tribal Council and community regarding the extreme danger. Active engagement with and reliance on mutual aid resources and BIA support. Prioritization of incident response based on threat to life and critical assets.

Fire Activity Levels:

The LJIRFD will maintain a vigilant awareness of both local fire ignitions and the broader regional fire activity. Tracking the number, size, and behavior of fires in the surrounding areas is crucial for anticipating potential resource demands, understanding the overall risk environment, and proactively adjusting preparedness levels accordingly. The following outlines general fire activity levels and associated management actions:

- **Low Fire Activity:** Few or no new ignitions in the local and surrounding areas. Existing fires are small and easily contained.
 - o **Associated Actions:** Maintain routine monitoring and staffing. Continue standard prevention efforts.
- **Moderate Fire Activity:** A moderate number of new ignitions in the local or surrounding areas. Some existing fires may require extended suppression efforts.
 - o **Associated Actions:** Increase monitoring and readiness levels. Review resource availability and potential needs. Reinforce public fire safety messaging. Potential activation of additional personnel.
- **High Fire Activity:** A significant number of new ignitions in the local and surrounding areas, with some larger fires requiring substantial resource commitment. Potential for resource shortages.
 - o **Associated Actions:** Implement higher Preparedness Levels. Activate all available local resources. Aggressively pursue initial attack on new ignitions. Coordinate closely with mutual aid partners and BIA Dispatch for potential resource support. Consider implementing stricter fire restrictions.
- **Extreme Fire Activity:** Numerous large and rapidly spreading fires burning in the local and surrounding areas, overwhelming local and regional resources. Significant threat to life and property.
 - o **Associated Actions:** Focus on life safety and protection of critical infrastructure. Maximize utilization of all available resources, including requesting significant mutual

1498 aid and BIA support. Implement widespread evacuations and closures as necessary.
1499 Prioritize incident response based on the greatest threat.

1500 **Resource Commitments:**

1501 The LJRFD will maintain a real-time understanding of the availability and current commitment status of
1502 all its personnel (both full-time and on-call) and its critical firefighting apparatus and equipment. This
1503 includes knowing which resources are available for immediate deployment, which are currently assigned
1504 to incidents (both within and outside the Reservation), and any limitations on their availability due to
1505 maintenance or other factors.

1506 Decisions regarding the acceptance of **out-of-jurisdiction assignments** (requests for LJRFD resources to
1507 assist with incidents occurring outside the La Jolla Indian Reservation boundaries) will be carefully
1508 evaluated based on the following critical criteria:

- 1509 • **Local Wildfire Risk:** The current and predicted wildfire risk within the La Jolla Indian Reservation
1510 will be the paramount consideration. Resources will not be deployed out of-jurisdiction if doing
1511 so would significantly compromise the LJRFD's ability to effectively respond to potential
1512 incidents within its own jurisdiction.
- 1513 • **Local Resource Availability:** A thorough assessment of the remaining available LJRFD personnel
1514 and equipment will be conducted. Out-of-jurisdiction assignments will only be considered if
1515 sufficient resources remain to adequately protect the Reservation.
- 1516 • **Regional Resource Availability:** The overall fire situation and resource availability within the
1517 broader region will be taken into account. If regional resources are already significantly strained,
1518 the LJRFD may be less inclined to commit its own assets out of-jurisdiction.
- 1519 • **Existing Mutual Aid Agreements and Compacts:** The terms and conditions of any existing formal
1520 mutual aid agreements or compacts with neighboring agencies or the BIA will be adhered to
1521 when considering out-of-jurisdiction requests. These agreements may outline specific
1522 obligations or protocols for resource sharing.
- 1523 • **Incident Urgency and Potential Impact:** The urgency and potential impact of the out-of-
1524 jurisdiction incident will be considered. Requests for assistance with incidents posing a
1525 significant threat to life or critical infrastructure may receive higher priority.

1526 Clear, concise, and timely communication regarding the LJRFD's resource availability and current
1527 commitment status will be always maintained with the Bureau of Indian Affairs (BIA) Dispatch Center
1528 and all relevant local, state, and federal partners. This ensures effective coordination and resource
1529 allocation during wildfire incidents and preparedness activities.

1530 **4.2.5 PREPAREDNESS LEVELS (PL)**

1531 This section provides a detailed breakdown of the specific conditions and proactive actions associated
1532 with each established Preparedness Level within the La Jolla Indian Reservation's fire management
1533 program. These levels represent a graduated scale of readiness designed to ensure an appropriate and
1534 timely response to evolving wildfire risks.

- 1535 • **Preparedness Level 1 (Low):** This level corresponds to periods of low fire danger, typically
1536 characterized by favorable weather conditions such as recent rainfall, moderate temperatures,

and high humidity, resulting in low burning indices. Associated actions at this level include maintaining **normal day-to-day staffing levels** within the Fire Department, conducting **routine checks and maintenance of all firefighting equipment and apparatus**, ensuring adequate fire cache inventory, and ongoing training activities. Public awareness messaging focuses on general fire safety practices.

- **Preparedness Level 2 (Moderate):** This level is initiated when burning indices begin to rise, weather forecasts indicate a trend towards drier and warmer conditions, and there is an increased potential for fire activity. Associated actions include **increased monitoring of NFDRS burning indices and weather forecasts**, a **heightened state of situational awareness** among all personnel, and a **potential for increasing initial attack staffing** based on anticipated risk. Equipment readiness is re-emphasized, and initial public information messaging may focus on increasing vigilance and responsible outdoor activities.
- **Preparedness Level 3 (High):** This level is implemented during periods of high fire danger, marked by sustained high burning indices, unfavorable weather conditions (e.g., higher temperatures, lower humidity, increased wind potential), and an elevated risk of significant fire activity. Associated actions include **implementing increased staffing levels** to ensure adequate initial and extended attack capabilities, conducting **comprehensive checks of all equipment and ensuring its immediate readiness**, actively disseminating **public information messaging emphasizing the increased fire danger and preventative measures**, and the **potential implementation of restrictions on certain activities** known to pose a higher risk of ignition (e.g., open burning).
- **Preparedness Level 4 (Very High):** This level signifies a period of very high fire danger, characterized by critically high burning indices, forecasts of extreme fire weather conditions (e.g., Red Flag Warnings), and a significant potential for rapid fire spread and intense fire behavior. Associated actions include mobilizing **maximum available staffing, prepositioning firefighting resources** (personnel and equipment) in strategic locations for rapid deployment, **implementing strict burn restrictions and potential closures of high-risk areas**, and conducting **enhanced patrols** to detect and respond to ignitions quickly. Public messaging intensifies, emphasizing the extreme danger and potential for evacuations.
- **Preparedness Level 5 (Extreme):** This represents the highest level of fire preparedness, indicating extreme fire danger with critical burning indices, severe fire weather conditions, and active large fires in the region or on the Reservation. At this level, **all available Tribal fire resources are fully committed**, and there is a **high potential for requesting additional firefighting resources from external agencies** through mutual aid agreements. **Implementation of area closures and mandatory evacuations may become necessary** to protect life and property. The primary focus shifts to **life safety and the protection of critical infrastructure**.

Specific trigger points for escalating between these Preparedness Levels will be based on a dynamic combination of real-time and forecasted burning indices derived from the LJIR's NFDRS plan and neighboring RAWs data, short- and long-term weather forecasts (including temperature, humidity, and wind patterns), current local and regional fire activity, and the immediate availability of firefighting resources. These decisions will be made by the Fire Chief or their designated representative, often in close consultation with relevant interagency partners (e.g., BIA, CAL FIRE) to ensure a coordinated and informed response based on the overall fire risk environment.

4.2.6 DISPATCH RESPONSE PROTOCOLS

This section details the standard dispatch response protocols for various fire, medical, and other emergency incidents reported within the La Jolla Indian Reservation and surrounding response area. These protocols serve as initial guidelines to ensure a swift and appropriate allocation of resources based on the information available at the time of dispatch.

- **Wildland Fire:**

- o **Initial Report of Smoke/Unconfirmed Fire:** Typically, the initial dispatch will involve a **single Type 6 wildland fire engine** staffed with a minimum of **three personnel (Engine Boss/FFT1 and two Firefighter Type 2s)** for initial investigation and size-up.
- o **Confirmed Wildland Fire (Reported Size/Behavior):** Upon confirmation of a wildland fire with specific details regarding size, rate of spread, and potential threats, a **full initial wildland fire assignment** will typically be dispatched. This may include:
 - **One or more Type 6 wildland fire engines** (staffed with Engine Bosses/FFT1 and Firefighter Type 2s).
 - **A Wildland Fire Crew** (if available and requested, typically a Type 2 Initial Attack Crew with a Crew Boss/CRWB and crew members).
 - **A Battalion Chief or Duty Officer** for incident command.
 - **Water tender(s)** based on water source availability and fire behavior potential.
 - **Air resources (helicopter or fixed-wing aircraft)** may be requested based on fire behavior, terrain, and resource availability, following established agency procedures and interagency agreements.

- **Structure Fire:**

- o **Initial Report of Structure Fire:** The standard initial dispatch for a reported structure fire will typically include:
 - **One or more Type 1 or Type 3 fire engines** (staffed with a Fire Captain, Engineer, and Firefighters).
 - **A medic unit (ambulance)** staffed with Paramedics or EMTs.
 - **A Battalion Chief or Duty Officer** for incident command.
 - Additional resources (e.g., truck company, additional engines) may be automatically added based on the nature of the report and local protocols.

- **Medical Aid:**

- o The standard dispatch for medical aid incidents will vary based on the nature of the medical emergency reported by the caller or through established Medical Priority Dispatch System (MPDS) codes. Typical responses may include:
 - **A medic unit (ambulance)** staffed with Paramedics or EMTs.
 - **A fire engine or other first responder unit** (staffed with personnel trained in basic or advanced life support) may be dispatched concurrently to provide rapid initial care and support to the medic unit.

- **Vehicle Accidents:**

- o The standard dispatch for reported vehicle accidents will typically include:
 - **A fire engine or rescue unit** (staffed with personnel trained in vehicle extrication and medical first response).
 - **A medic unit (ambulance)** staffed with Paramedics or EMTs, particularly if injuries are reported.
 - Law enforcement agencies will also be dispatched according to established protocols.

- **Other Emergencies (e.g., Hazmat, Technical Rescue):**

- o The initial dispatch for other specialized emergencies will focus on **obtaining detailed information regarding the nature and scope of the incident**. Initial responding units will typically be **fire engines or other general emergency response vehicles** staffed with personnel trained in initial assessment and scene security.
- o The dispatch center will immediately initiate **notification protocols for specialized resources** based on the initial information received. This may include contacting Hazmat teams, technical rescue teams (e.g., swift water rescue, high-angle rescue), utility companies, or other specialized agencies as required. The initial responding units will focus on scene safety, isolation, and providing initial information to the arriving specialized teams.

It is critical to understand that these dispatch protocols serve as **standard guidelines** to facilitate a rapid and appropriate initial response. The actual resources dispatched, and the tactical approach taken upon arrival may be **adjusted based on the specific circumstances of the incident**, additional information received from the reporting party or responding units, and the professional judgment of the **initial Incident Commander (IC)** or other qualified personnel on scene. The safety of responders and the public remains the paramount consideration in all dispatch and response decisions.

4.2.7 STAFFING LEVELS

This section outlines the planned daily staffing levels for the La Jolla Reservation Fire Department (LJRFD) throughout the operating year. It is important to note that these staffing levels are dynamic and may be strategically adjusted upwards based on the prevailing Preparedness Level, the issuance of Red Flag Warnings by the National Weather Service, observed increases in local or regional wildland fire activity, and other relevant factors as determined by the Fire Chief or their designee. The goal of these flexible staffing adjustments is to ensure the LJRFD maintains an appropriate level of response capability to effectively address the current and anticipated fire risk.

- **Minimum Daily Staffing:** The standard minimum daily staffing for the LJRFD under Preparedness Levels 1 and 2 (Low and Moderate Fire Danger) will be **two (2) personnel**. This typically consists of at least one qualified **Engine Boss (FFT1)** and one **Firefighter Type 2 (FFT2)**, ensuring a basic initial attack capability for most routine incidents and the ability to conduct essential preparedness and prevention activities.
- **Increased Staffing Triggers:** Staffing levels will be proactively increased beyond the minimum based on the following triggers:
 - o **Preparedness Level 3 (High) or higher:** When the Preparedness Level escalates to High, Very High (Level 4), or Extreme (Level 5), staffing will be augmented to ensure a more robust initial and extended attack capacity. The specific increase in staffing will be determined by the Fire Chief based on the specific Preparedness Level and the anticipated workload.
 - o **Red Flag Warnings:** The issuance of a Red Flag Warning for the operational area by the National Weather Service automatically triggers an increase in staffing to the **maximum available on-duty personnel**. This heightened staffing posture ensures a rapid and overwhelming initial response capability during periods of critical fire weather.
 - o **Increased Local or Regional Fire Activity:** A noticeable increase in wildland fire ignitions or significant fire activity within the La Jolla Indian Reservation or in the immediate surrounding region will prompt an increase in staffing to the **maximum available on-**

duty personnel. This allows the LJRFD to effectively manage potential multiple incidents and provide mutual aid if requested.

- **Recall Procedures:** To ensure adequate staffing during periods of heightened risk or active incidents exceeding on-duty capacity, the LJRFD has established the following recall procedures:
 - o **Notification Protocol:** In the event of escalating fire danger (e.g., imminent Red Flag Warning) or the occurrence of a significant incident, off-duty personnel will be promptly notified via a pre-determined communication system (e.g., phone call, text message, pager alert) that they are being placed on **standby or on-call status**. This notification will provide relevant information regarding the potential need to return to duty.
 - o **Activation for Duty:** If an incident is imminent or has occurred that requires additional resources, the Fire Chief or their designee will activate the recall, directing designated off-duty personnel to return to their assigned duty stations as quickly and safely as possible. The recall order will specify reporting times and assignments.
- **Use of Temporary or Seasonal Staff (LJR Volunteers):** The LJRFD recognizes the potential value of utilizing trained volunteers from the La Jolla Indian Reservation to augment staffing levels during peak fire season or significant incidents. To formalize this, the following protocol will be developed and implemented:
 - o **Volunteer Recruitment and Training:** Interested La Jolla Tribal members will be actively recruited and provided with **nationally recognized wildland firefighter training** (e.g., S-130, S-190, L-180) to meet basic wildland firefighter qualifications. Additional specialized training (e.g., basic engine operations, fire prevention education) may also be offered based on individual interest and program needs.
 - o **Memorandum of Understanding (MOU):** A formal Memorandum of Understanding (MOU) will be established outlining the roles, responsibilities, limitations, compensation (if any), and operational guidelines for LJR volunteer temporary staff. This MOU will ensure clear expectations and legal compliance.
 - o **Activation and Deployment:** Trained and qualified LJR volunteers may be activated for temporary duty during periods of increased fire danger or to support active incidents, under the direct supervision of qualified LJRFD career staff. Their deployment will be based on their level of training and the specific needs of the incident or preparedness activity. A clear check-in and check-out process will be established to track volunteer hours and assignments.
 - o **Safety and Welfare:** The safety and welfare of all LJR volunteer temporary staff will be paramount. They will be provided with appropriate Personal Protective Equipment (PPE), clear assignments, and adequate supervision, adhering to all established safety protocols and incident management guidelines.

4.2.8. TRIGGER POINTS FOR SPECIFIC ACTIONS

This section clearly identifies specific environmental conditions, observable fire behavior indicators, or critical resource status that will automatically trigger pre-determined proactive and reactive actions within the La Jolla Indian Reservation's fire management program. These triggers ensure a timely and appropriate response to escalating wildfire risks and evolving incident complexities.

- **Red Flag Warning:** Upon the official issuance of a Red Flag Warning by the National Weather Service for the La Jolla operational area, indicating critical fire weather conditions (e.g., high

winds, low relative humidity, high temperatures, dry fuels), the following immediate actions will be implemented to aggressively decrease potential ignition sources and enhance readiness:

- o **Significant increase in proactive fire patrols** by LJIRFD personnel and potentially Tribal Law Enforcement in high-risk areas.
- o **Automatic and immediate suspension of all open burning permits** issued by the Tribe.
- o **Heightened readiness posture** for all LJIRFD personnel and equipment, ensuring rapid deployment capabilities.
- o Enhanced public messaging through various channels (e.g., social media, Tribal radio, community alerts) emphasizing the extreme fire danger and urging residents and visitors to exercise extreme caution and refrain from any activities that could potentially cause a spark.
- **Specific Burning Index Thresholds:** As the Fire Danger Rating System (FDRS) or National Fire Danger Rating System (NFDRS) rating levels increase, exceeding pre-defined Burning Index (BI) thresholds, the following escalating actions will be automatically initiated:
 - o **Increased and more prominent public messaging** communicating the rising fire danger, providing specific preventative measures, and outlining potential restrictions.
 - o **Implementation of stricter conditions and increased scrutiny for any essential burn permits** that may still be authorized under specific circumstances.
 - o Potential for increased staffing levels and enhanced equipment readiness checks as higher BI thresholds are reached, mirroring the actions outlined in the Preparedness Level section.
- **Rapid Fire Growth or Immediate Threat to Values at Risk:** In the event of a wildland fire exhibiting rapid and uncontrolled growth, or when a fire poses an immediate and credible threat to identified critical values at risk (e.g., residential areas, Tribal infrastructure, cultural sites, sensitive natural resources), the following immediate actions will be prioritized:
 - o **Aggressive and immediate ordering of additional firefighting resources**, including requesting mutual aid from neighboring agencies (BIA, CAL FIRE, County resources, air support).
 - o **Implementation of pre-planned structure protection measures** in threatened areas, including engine placement, hose lays, and the deployment of structure protection teams.
 - o **Issuance of proactive and timely evacuation warnings and/or mandatory evacuation orders** for impacted or potentially impacted areas, following established Tribal emergency management protocols and in coordination with Tribal Law Enforcement and Emergency Management.
- **Resource Shortages:** In the event of significant shortages of critical firefighting resources (e.g., personnel, engines, water tenders, aircraft) due to multiple concurrent incidents or other factors, the following actions will be implemented to ensure the most effective allocation of available resources:
 - o **Prioritization of incident response** based on the immediate threat to life and safety, followed by the protection of property and critical infrastructure, and then the protection of natural and cultural resources, guided by the Tribe's identified Values at Risk.
 - o **Immediate activation of mutual aid agreements** with neighboring agencies to request additional resources as needed, following established protocols and communication channels.
 - o **Implementation of resource allocation strategies** to ensure that available resources are deployed to incidents where they can have the greatest impact and achieve the most

critical objectives. This may involve a tiered response based on incident priority and resource availability.

4.2.9 MITIGATING STRATEGIES

This section details a comprehensive suite of proactive and reactive strategies meticulously designed to effectively mitigate wildfire risk and minimize potential impacts on the La Jolla Indian Reservation's community, infrastructure, and natural and cultural resources.

- **Fire Prevention:** The LJIR's fire prevention program employs a multi-faceted approach aimed at reducing the incidence of unwanted human-caused ignitions. Key activities include:
 - **Comprehensive Public Education Campaigns:** Utilizing various outreach methods (e.g., community meetings, social media, printed materials, school programs) to raise awareness about wildfire risks, safe practices, and the importance of individual responsibility in preventing fires. These campaigns will be culturally relevant and incorporate Tribal perspectives.
 - **Strict Enforcement of Burn Permits and Fire Restrictions:** Implementing a clear and consistently enforced burn permit system, along with the timely imposition and communication of fire restrictions based on current and predicted fire danger levels. This includes regulations regarding open burning, campfires, and other potential ignition sources.
 - **Strategic Hazardous Fuels Reduction Projects:** Implementing a prioritized program of fuels management activities (e.g., mechanical thinning, brush removal, creation of fuel breaks) in key areas, particularly within the wildland-urban interface and around critical infrastructure, to reduce fuel loads and modify fire behavior. These projects will be planned and executed in consultation with Tribal environmental and cultural resource departments.
 - **Community Risk Reduction Initiatives:** Engaging directly with the Tribal community to implement programs like Firewise USA®, providing education and resources to help residents create defensible space around their homes and take proactive steps to reduce their property's vulnerability to wildfire.
- **Pre-Suppression:** Proactive measures taken before a fire ignites are crucial for enhancing the LJIR's ability to effectively respond to and contain wildfires. These activities include:
 - **Aggressive Fuels Management:** Implementing the hazardous fuels reduction projects outlined in Fire Prevention, strategically modifying fuel characteristics across the landscape to reduce fire intensity and rate of spread.
 - **Diligent Equipment Maintenance:** Ensuring that all firefighting apparatus, equipment, and tools are maintained in optimal working condition through regular inspections, servicing, and repairs.
 - **Comprehensive Personnel Training:** Providing ongoing and realistic training exercises for all LJIRFD personnel, ensuring proficiency in wildland fire suppression tactics, safety procedures, incident command, and the proper use of equipment. This includes interagency training opportunities to enhance coordination.
 - **Robust Interagency Coordination:** Maintaining strong communication channels and collaborative relationships with neighboring agencies (BIA, CAL FIRE, County Fire) through regular meetings, joint planning efforts, and the development of mutual aid agreements to ensure seamless resource sharing and coordinated response.

- **Suppression Tactics:** The LJIRFD's preferred suppression tactics prioritize the safety of firefighters and the public above all else, while also emphasizing the protection of identified values at risk and minimizing environmental impact. Suppression efforts will be consistent with established BIA and Tribal policies and guidelines, and will generally include:
 - **Aggressive Initial Attack:** Employing a rapid and decisive response to all new fire ignitions with the goal of containing and extinguishing them quickly, minimizing the potential for large and damaging fires.
 - **Direct Attack:** Engaging the fire directly at its burning edge using hand crews, engines, and other resources when conditions allow for safe and effective suppression.
 - **Indirect Attack:** Utilizing tactics such as constructing fire lines ahead of the fire, using natural barriers, and employing aerial resources to influence fire behavior and create containment lines when direct attack is unsafe or less effective.
 - **Resource Protection Strategies:** Implementing specific tactics to protect identified values at risk, such as structure protection measures, the use of fire retardant around sensitive areas, and careful consideration of suppression activities near cultural sites and sensitive habitats.
 - **Minimizing Environmental Impact:** Employing suppression tactics that minimize soil disturbance, watercourse contamination, and damage to non-target vegetation to the greatest extent possible, consistent with safety and operational objectives.
- **Post-Fire Management:** Effective post-fire management is essential for mitigating long-term impacts and promoting ecological recovery. Initial actions following fire containment will include:
 - **Thorough Fireline Rehabilitation:** Implementing measures to stabilize fire lines, prevent erosion, and minimize the spread of invasive plant species. This may involve installing water bars, seeding with native species, and mulching disturbed areas.
 - **Comprehensive Hazard Assessment:** Identifying and mitigating any remaining hazards, such as unstable trees, burned-out stump holes, and potential for debris flows, to ensure public and firefighter safety.
 - **Close Coordination with Tribal Environmental and Cultural Resource Departments:** Working collaboratively with these departments to assess fire impacts on natural and cultural resources and to develop appropriate restoration and mitigation plans, incorporating Traditional Ecological Knowledge where relevant.
- **Smoke Management:** Recognizing the potential health and visibility impacts of smoke from both wildfires and prescribed fires, the LJIR will implement strategies to minimize these effects:
 - **Development and Implementation of a Smoke Management Plan:** A detailed Smoke Management Plan (either as a standalone document or integrated within this WFMP) will outline specific protocols for minimizing smoke impacts.
 - **Utilization of Weather Forecasts:** Carefully monitoring weather patterns and atmospheric conditions to inform decisions regarding prescribed burning and to predict smoke dispersion from wildfires.
 - **Consideration of Burn Timing and Techniques:** Planning prescribed burns to take advantage of favorable weather conditions that promote smoke dispersion away from populated areas. Employing burning techniques that minimize smoke production where feasible.
 - **Proactive Public Notification:** Providing timely and informative notifications to the Tribal community and surrounding areas about planned prescribed burns and potential smoke impacts from wildfires, utilizing various communication channels.

- **Community Preparedness:** Empowering the Tribal community to prepare for and respond to wildfires is a critical component of the LJIR's overall fire management strategy. Key strategies include:
 - o **Promoting Firewise USA® Principles:** Actively encouraging residents to implement Firewise principles around their homes, creating defensible space, using fire-resistant building materials, and taking other proactive measures to reduce the risk of property loss.
 - o **Providing Evacuation Planning Assistance:** Developing and disseminating clear evacuation plans and routes for residential areas and critical infrastructure, conducting community drills, and providing assistance to residents with limited mobility.
 - o **Public Education on Defensible Space:** Offering educational workshops, site visits, and resources to inform residents about the importance of defensible space and how to effectively create and maintain it around their homes.
 - o **Community Emergency Response Team (CERT) Training:** Supporting and promoting CERT training within the Tribal community to equip residents with basic disaster preparedness and response skills, including wildfire awareness and preparedness.

4.2.10 TRAINING AND QUALIFICATIONS

The La Jolla Reservation Fire Department (LJRFD) is dedicated to the continuous development and maintenance of a highly qualified wildland fire resource crew that consistently meets and strives to exceed the most rigorous national standards. This section comprehensively outlines the protocols, requirements, and guiding principles for achieving and sustaining this critical objective, ultimately ensuring the safety and effectiveness of our wildland fire operations.

A. National Standards and Mobilization:

All LJRFD personnel actively involved in wildland fire suppression operations are mandated to meet the national minimum standards for experience, training, medical fitness, and physical fitness as meticulously established by the National Wildfire Coordinating Group (NWCG) and detailed in the current *Wildland Fire Qualification System Guide PMS 310-1*. For mobilization to incidents, LJRFD crews will strictly adhere to the NWCG minimum crew standards as comprehensively outlined in **Appendix C of PMS 310-1**, ensuring that our deployed resources meet interagency requirements for safe and effective operations.

B. Crew Organization:

The primary and standard organizational structure for LJRFD wildland fire crews intended for mobilization will be as **Type 2 crews**, providing a well-trained and supervised hand crew resource. However, recognizing the dynamic nature of wildland fire incidents and to effectively meet specific incident needs, the LJRFD retains the flexibility to organize and deploy crews with alternative structures on a case-by-case basis. These alternative structures may include **Type 2 Initial Attack (IA) crews** focused on rapid suppression of new ignitions, or specialized **IA Modules** tailored for specific tasks. The personnel composition of these crews may strategically incorporate a combination of General Schedule (GS) employees (if applicable), directly employed Tribal personnel, and qualified Administratively Determined (AD) personnel, ensuring a diverse and capable workforce. All personnel-related matters, including hiring, compensation, and performance evaluation, will be the sole responsibility of the

respective hiring authority (GS, Tribal, or AD) based on the individual's specific employment status. While complete self-sufficiency is not a mandatory requirement for Type 2 IA crews, the LJRFD is committed to actively equipping and training its IA crews to achieve the highest level of practical self-sufficiency possible. This proactive approach enhances operational effectiveness, reduces logistical burdens, and promotes greater autonomy during critical initial attack phases.

C. Chainsaw Operations:

The LJRFD unequivocally recognizes the critical importance of safe and efficient chainsaw operations in effective wildland fire management. We actively encourage our crews to have a minimum of **two (2) personnel qualified and officially "carded" as chainsaw operators** in accordance with NWCG standards. This qualification will be clearly documented on the official crew manifest whenever the crew is dispatched to an incident. It is imperative to understand that chainsaw operators will only be eligible for compensation at a designated Faller A, B, or C pay rate if that specific role is explicitly requested by the Incident Management Team (IMT) or the local incident command authority on the official resource order. The ultimate decision regarding the operational necessity and utilization of chainsaws rests solely with the IMT or the local Incident Commander (IC). When chainsaw use is formally requested and qualified LJRFD personnel are available and assigned to the crew, they will be authorized to operate chainsaws during the incident. Any temporary adjustments to AD pay rates to accurately reflect requested sawyer certification levels (Faller A, B, or C) will be made strictly on a per-operational shift basis and must be clearly and accurately documented on the official General Message Form (ICS-213) or the Crew Time Report (CTR) (SF-261) by a designated representative of the IMT or local incident command.

D. Equal Employment Opportunity (EEO):

The LJRFD maintains an unwavering and absolute commitment to the fundamental principles of Equal Employment Opportunity (EEO). All phases of crew management, encompassing recruiting, hiring, training, professional development, and fair performance evaluation of all crew personnel, will be conducted strictly in accordance with established EEO practices and regulations. It is the steadfast policy of the LJRFD to provide equal employment opportunities to all qualified individuals without regard to race, creed, color, sex, national origin, age, or physical disability, fostering a diverse and inclusive workforce.

E. Physical Fitness:

The *Work Capacity Test (WCT) Administrator's Guide* will serve as the definitive standard for determining the required physical fitness level for all wildland fire positions within the LJRFD. For personnel hired through formal cooperative agreements with other agencies, the LJRFD will formally accept the physical fitness standards established by the sponsoring agency, provided they meet or exceed NWCG minimums. The Fire Management Officer (FMO) or Assistant Fire Management Officer (AFMO) for the LJRFD retains the full authority to require the completion of a WCT by any personnel at any time deemed necessary to ensure that all individuals maintain the requisite physical capabilities to safely and effectively perform their assigned duties.

F. Incident Qualification Card (IQCS):

The Incident Qualification and Certification System (IQCS) will be the primary and official system utilized by the LJRFD for meticulously recording and comprehensively documenting employee qualifications, relevant experience, and all training related to both wildland and prescribed fire incidents. It is mandatory that all wildfire and prescribed fire incident experience for all LJRFD personnel is accurately and promptly entered into IQCS to ensure verifiable qualifications for both interagency and local dispatch opportunities. Individuals without a complete and up-to-date IQCS profile will **not** be eligible for dispatch to any incidents where qualification verification is a requirement.

For all Administratively Determined (AD) and Emergency Firefighter (EFF) personnel affiliated with the LJRFD, formal sponsorship by a designated home unit *within* the LJRFD is an absolute mandatory prerequisite for dispatch to any incident. Other units or agencies will not dispatch AD/EFF personnel whose primary sponsorship resides with the La Jolla Reservation Fire Department. If an AD/EFF firefighter has permanently relocated and seeks sponsorship from a new local unit (either within the LJRFD or with an external agency), a formal written request for sponsorship is strictly required. This request must be formally coordinated between the current home FMO and the FMO of the new sponsoring local unit. Upon formal approval by both FMOs, the individual's comprehensive IQCS record, including all pertinent documentation (training certificates, physical fitness records, active task books, any disciplinary records, official correspondence, etc.), will be officially transferred to the new sponsoring unit. Once the complete record transfer is verified, the individual is officially sponsored by the new local unit and will be eligible for dispatch solely through that sponsoring unit.

In strict accordance with relevant guidance, a comprehensive crew manifest, formally signed by the LJRFD FMO or a designated Tribal authority, explicitly certifying the qualifications of all personnel assigned to a Type 2 Native American crew, will be formally accepted in lieu of individual incident qualification cards for mobilization within the **Pacific Region**. This specific exception includes the critical Crew Boss position. However, each individual AD/EFF firefighter is still strictly required to possess an individual qualification card printed directly from IQCS, adhering to all national policy directives. The LJRFD strongly recommends that individual qualification cards be proactively produced for *all* AD/EFF firefighters in *all* instances to ensure seamless and efficient interagency dispatchability across all geographic areas.

For Compacted or 638 Tribes operating under their own inherent authority, the full burden of proof rests with them to definitively demonstrate the consistent use of IQCS or an equivalent qualification verification system with similar robust controls. Any AD/EFF firefighter functioning in an overhead (e.g., Division Supervisor, Safety Officer) or technical specialist (e.g., GIS Specialist, Fire Behavior Analyst) position is strictly required to carry a valid incident qualification card printed directly from IQCS at all times while on assignment.

G. Medical Standards (Continued):

Agency administrators and supervisory personnel within the La Jolla Reservation Fire Department bear the ultimate responsibility for the occupational health and safety of all their employees actively engaged in wildland and prescribed fire activities. This responsibility may necessitate employees undergoing medical examinations at any time deemed medically necessary by the agency to ensure their fitness for duty.

To rigorously ensure that all individuals hired for arduous duty positions are both medically and physically fit for the inherently demanding tasks involved in wildland firefighting, the *Federal*

- 1974 *Interagency Wildland Firefighter Medical Qualification Standards* will be strictly and consistently
1975 adhered to.
- 1976 For all Arduous duty rated Administratively Determined (AD) and Emergency Firefighter (EFF) employees
1977 who are **45 years of age or older**, an annual Medical Standards Examination is mandatory *prior* to their
1978 participation in the Work Capacity Test (WCT).
- 1979 Arduous, Moderate, and Light duty rated AD/EFF employees who are **under 45 years of age** are required
1980 to complete the *Native American Crew (NAC) Physical Examination* at a minimum of every three (3)
1981 years, as comprehensively detailed in **Appendix B** of relevant guiding documents (e.g., BIA Wildland Fire
1982 Management Program Guide).
- 1983 It is absolutely crucial to understand that medical examinations serve as a vital diagnostic tool, providing
1984 an essential early warning system for the detection of potential underlying health problems that could
1985 significantly affect employees involved in strenuous wildland or prescribed fire activities. If the formal
1986 results of a medical examination definitively determine that an employee is medically unfit for arduous-
1987 level duty, they will **not** be permitted to take the work capacity test for arduous duty or participate in
1988 any wildland or prescribed fire assignments at the arduous duty level.
- 1989 **H. Drug Testing:**
- 1990 In its unwavering commitment to proactively promoting a Drug-Free Workplace environment and
1991 ensuring full compliance with all applicable Federal Departmental Manuals, the La Jolla Reservation Fire
1992 Department mandates that every AD/EFF firefighter must submit to an annual drug test as a condition
1993 of initial and continued hire. Furthermore, in strict accordance with the Department of Interior,
1994 Departmental Manual (DM) 370 DM 792, 10.1, all AD/EFF hires are subject to random and reasonable
1995 suspicion drug testing throughout the entire duration of their employment with the LJRFD.
- 1996 Drug testing procedures will utilize accurate and reliable methodologies to screen for the presence of
1997 marijuana (THC), cocaine (COC), opiates (OPI), amphetamines (mAMP), and phencyclidine (PCP). A
1998 confirmed positive test result will immediately disqualify an applicant from hire for a minimum period of
1999 six (6) months. Individuals who test positive a second time at any point while completing the hiring
2000 requirements or during their employment will be permanently ineligible to participate in the NAC
2001 program through the La Jolla Reservation Fire Department.
- 2002 **I. Age Requirements:**
- 2003 No individual under the age of eighteen (18) years will be hired or dispatched for any wildland fire
2004 assignments under the provisions of this plan, strictly adhering to child labor laws and ensuring the
2005 safety and well-being of minors.
- 2006 **J. Crew Boss and Crew Member Selection for Dispatch:**
- 2007 The Fire Management Officer (FMO) of the La Jolla Reservation Fire Department holds the ultimate
2008 responsibility for ensuring that all individuals dispatched for wildland fire assignments are fully and
2009 verifiably qualified for their assigned roles and that the final crew manifest accurately and completely
2010 reflects the qualifications of each and every crew member. Dispatchers, working in close consultation

with qualified and experienced Crew Bosses and under the direct guidance and authority of the FMO, will be responsible for selecting qualified Squad Bosses and competent Crew Members for deployment to incidents.

To actively foster leadership development and build capacity within the LJRF, the home unit FMO, in close collaboration with established local crew boss organizations or experienced and respected crew leaders, will develop and implement a transparent and equitable selection process for identifying, mentoring, and training promising Crew Boss trainees.

K. Type 2 Crew Positions and Standards:

Native American Crew (NAC) Type 2 crews mobilized by the La Jolla Reservation Fire Department are expected to diligently and safely complete all assigned work tasks and maintain orderly and professional conduct throughout their entire period of employment on an incident, representing the Tribe with professionalism and competence. The Crew Boss bears the ultimate and direct responsibility for the overall conduct, work performance, and absolute safety of the entire crew throughout the duration of the assignment. To ensure effective leadership, clear communication, and direct control, Type 2 crews will not be split or deployed over such a geographically dispersed area that the assigned Crew Boss is unable to directly supervise and maintain positive control of all crew members. The following outlines the standard Type 2 crew positions and their corresponding minimum qualification standards:

- **Crew Member (Firefighter Type 2 - FFT2):** Crew members serve as integral and active members of a wildland fire suppression crew. They must demonstrate proficiency and skill in the safe and effective use of a comprehensive variety of standard wildland fire suppression hand tools, including, but not limited to, the McLeod, Pulaski, shovel, and various combination tools.
- **Squad Boss (Firefighter Type 1 - FFT1):** Squad Bosses serve as critical work leaders and direct supervisors within the Type 2 crew, working directly under the close supervision and guidance of the Crew Boss. They are directly responsible for work effectiveness, safety, professional conduct, overall welfare, and maintenance of discipline within their assigned squad of crew members. Individuals seeking formal qualification as a Squad Boss must have successfully completed all mandatory NWCG training courses for the FFT1 position. Furthermore, they must have demonstrably exhibited leadership ability through acceptable performance on a minimum of two (2) wildland fire assignments within the preceding five (5) years, possess a completed and endorsed Firefighter Type 1 / Incident Commander Type 5 task book, and have received a formal letter of recommendation from an FMO, an experienced Crew Boss, or a recognized and respected crew representative.
- **Crew Boss (Single Resource Boss - CRWB):** Crew Bosses hold a position of significant leadership and responsibility, being directly and fully accountable for the strict implementation of the NAC plan guidelines, the accurate and timely recording of all crew time and expenses, the overall work effectiveness and productivity of the crew, ensuring the absolute safety and welfare of each crew member, maintaining proper and effective crew organization, conducting thorough and informative shift briefings, consistently ensuring crew discipline and adherence to standards of conduct, and the accurate and complete completion of all required accident and injury forms (CA-1, CA-2, CA-16, etc.) in the event of an incident. Crew Bosses are also expected to maintain a comprehensive daily diary or log documenting all significant events, operational activities, and safety concerns encountered during their assignment. The current NAC operating plan will be thoroughly reviewed by each Crew Boss during their mandatory annual refresher training. Prior to demobilization from an incident, the Crew Boss must meticulously ensure that all necessary

accident forms are completed accurately and submitted, all emergency time reports are accurate and complete, and any discrepancies are fully resolved and documented. Upon the crew's safe return to their home unit, the Crew Boss is personally responsible for delivering a completed and comprehensive crew evaluation form to the home unit FMO or AFMO. Crew Bosses and individual crew members may be subject to appropriate disciplinary action if it is formally determined that a violation of the NAC plan conduct or performance standards occurred within their crew and was not properly reported by the responsible Crew Boss. Individuals who have successfully completed all required NWCG training for the Crew Boss position and have a formal task book officially initiated by their home unit may be provisionally assigned as a Crew Boss Trainee under the direct and continuous supervision of a fully qualified and experienced Crew Boss. When assigned to an incident with a designated Training Specialist, the Crew Boss Trainee will work closely with the Training Specialist to ensure that all required training and experience requirements are met and accurately documented in their task book.

L. Camp Crew Configuration:

The La Jolla Reservation Fire Department may strategically organize and deploy dedicated Native American Camp Crews to provide essential logistical support for incident operations, enhancing the overall efficiency and self-sufficiency of our fire management efforts. A standard NAC Camp Crew will typically consist of one Camp Crew Boss, one Squad Boss, and eight dedicated Crew Members. It is mandatory that all personnel assigned to a Camp Crew, including the Squad Boss and all Crew Members, have successfully completed Basic Firefighter Training (S-130), the Annual Fire Safety Refresher (RT-130), and Introduction to Leadership (L-180). A Light Work Capacity Test is a mandatory requirement for each Camp Crew position. Camp Crew members and their leaders are authorized to do up to eight (8) hours of annual training to specifically prepare them for the upcoming fire season and their unique support roles. This mandatory training will include, at a minimum, RT-130 with comprehensive fire shelter practice, a thorough review of dispatching procedures relevant to camp crews, and other pertinent topics as deemed appropriate by the FMO or a designated training officer. Additionally, all Camp Crew personnel will have successfully completed the Incident Command System (ICS) 700 course.

- **Camp Crew Member:** Crew members assigned to a camp crew perform a diverse range of essential tasks to directly support camp functions, which may include the efficient setting up and meticulous maintenance of sleeping areas for incident personnel, actively assisting with food service operations, effectively managing and organizing critical supplies, and performing other vital logistical duties as specifically assigned by their supervisors.
- **Camp Crew Squad Boss:** Squad Bosses within a camp crew serve as crucial work leaders and direct supervisors, working closely and collaboratively with the Camp Crew Boss. They are directly responsible for work effectiveness, safety, professional conduct, overall welfare, and maintenance of discipline within their assigned squad of camp crew members, ensuring a productive and safe working environment.
- **Camp Crew Boss:** Individuals selected and assigned as Camp Crew Bosses must have previously achieved and maintained qualification at the Firefighter Type 2 (FFT2) level and have successfully completed Basic Firefighter Training (S-130), Introduction to Wildland Fire Behavior (S-190), and the Annual Fireline Safety Refresher (RT-130). A current Light Work Capacity Test and successful completion of the Annual Refresher are also mandatory prerequisites for this leadership position. The Camp Crew Boss will report directly to the designated Facilities Unit Leader within the established Incident Management Team structure, ensuring seamless integration of camp support services.

M. Crew Representative (CREP):

When La Jolla Reservation Fire Department crews are dispatched to incidents located outside the **Pacific Region** Geographic Area, or to incidents within the **Pacific Region** that have Incident Management Teams assigned from outside that geographic area, a dedicated Crew Representative (CREP) will be assigned to facilitate communication and address crew-specific needs. The standard assignment ratio will be one (1) CREP for every two (2) dispatched crews, with the option of assigning a CREP to each individual crew based on incident complexity and logistical considerations. If a CREP is formally assigned to a crew, the crew will consist of a minimum of fifteen (15) firefighters and will not exceed a total of twenty (20) firefighters. The CREP will work closely and collaboratively with the Planning Section Chief and the Incident Assessment and Resource Reporting (IARR) personnel, if these positions are established and filled on the incident.

The current NAC operating plan will be thoroughly reviewed by each assigned Crew Representative during their mandatory annual refresher training, ensuring they are fully conversant with relevant policies and procedures. The CREP is expected to live and work alongside the assigned crew(s) throughout the incident and provide essential assistance to the Crew Boss(es) with administrative duties related to the implementation of the NAC plan guidelines. The CREP will not be involved in tactical decision

J. Crew Representative (CREP)

When La Jolla Reservation Fire Department crews are dispatched to incidents outside the LJIR a Crew Representative (CREP) will be assigned at a ratio of one CREP for every two crews, with the option of sending a CREP with each individual crew. If a CREP is assigned to a crew, the crew will consist of a minimum of fifteen firefighters and will not exceed twenty firefighters in total. The CREP will work closely with the Planning Section Chief and the Incident Assessment and Resource Reporting (IARR) personnel, if available on the incident.

The crew operating plan will be reviewed by each Crew Representative during their annual refresher training. The CREP is expected to live and work alongside the assigned crew(s) and assist the Crew Boss(es) with administrative duties related to the implementation of the NAC plan guidelines. The CREP will not be involved in tactical decision-making or direct crew supervision functions, as these remain the responsibility of the assigned Crew Boss(es). Furthermore, while assigned as a CREP, individuals will not be allowed to take on other overhead assignments or duties within the Incident Management Team. In the event of disciplinary problems within the crew(s) they are representing, the CREP will prepare a complete and accurate report documenting all offenses and forward it to the appropriate home unit FMO for immediate action. Prior to the release of the crew(s) from the incident, the CREP and each Crew Boss will complete all appropriate reports and submit them to the home unit FMO/AFMO.

K. Type 2 Initial Attack (IA) Crew/IA Modules

For the La Jolla Reservation Fire Department to establish a Type 2 Initial Attack (IA) crew or IA modules, the home unit FMO must submit a formal letter of request to their respective Regional Fire Management Officer (if applicable through BIA). This request must be accompanied by a crew manifest that clearly identifies all personnel assigned to the IA crew or module and their corresponding qualifications. The Type 2 IA manifest must specifically identify personnel who will serve in committed

positions within the IA resource. Orders for Type 2 IA crews and IA modules will be very specific regarding the required job capabilities and equipment.

L. Sawyers/Saw Teams

Home units within the La Jolla Reservation Fire Department that possess the capacity to organize dedicated sawyer or saw teams will utilize the NWCG guidance for establishing operational procedures and safety protocols. The LJRFD will ensure full compliance with all applicable local, regional, and national policies and regulations pertaining to chainsaw operations and sawyer certification.

M. Prescribed Burn Crews

The La Jolla Reservation Fire Department may organize and deploy prescribed burning crews to assist with on-the-ground fuels management treatment activities, as identified and authorized in Chapter 2 of the BIA Fuels Management Program, Business Rules Handbook (2008), the Interagency Agreement for Fire Management commonly referred to as the "Six Party Agreement, (2011-2015)" and the National Interagency Mobilization Guide, (NFES 2091).

Personnel assigned to fill prescribed fire positions must be hired through the Department of Interior following the AD Pay Plan. All individuals assigned to prescribed fire duties must meet the NWCG qualifications for their specific position and demonstrate the ability to perform their assigned tasks successfully and safely. Prescribed fire assignments will be carefully coordinated and mutually agreed upon between involved offices regarding personnel, resources, and the anticipated length of the assignment. The task order process outlined in the National Interagency Mobilization Guide will be used to formally document these agreements and implement these specialized projects.

This section is largely based on the guidance provided in the Native American Crew Plan (<https://gacc.nifc.gov/nrcc/dispatch/crews/NorthernRockiesNACPlan.pdf>). The La Jolla Reservation Fire Department is committed to working towards full compliance with these standards to ensure the safety and effectiveness of its wildland fire resources.

4.1.11 REVIEW AND REVISION

This Annual Operating Plan will be reviewed and updated annually, or as needed based on significant changes in resources, personnel, fire activity, or policy. The review process will involve input from all relevant LJRFD personnel and partner agencies.

4.2 MANAGEMENT OF UNPLANNED IGNITIONS

All wildland fires on the La Jolla Indian Reservation (LJIR) will undergo an initial attack response. This response will involve a thorough size-up of the current fire situation, a determination of the probable cause of ignition, and an assessment of the potential for fire spread. Based on this initial evaluation, a fire management response will be initiated, employing various tactics and strategies. Notably, this may include a determination to manage the fire (or portions thereof) for resource benefit, particularly in

designated areas like the Wildland Management Unit (WMU). However, for all human-caused wildland fires, the primary initial action will be suppression, executed at the lowest cost and with the fewest negative consequences for firefighters and public safety.

4.2.1 Preparedness

Wildfire represents the most significant natural hazard likely to impact the La Jolla Indian Reservation (LJIR). Historical records document multiple wildfires that have burned on or in close proximity to the Reservation, underscoring the persistent threat. The region faces a severe fire danger due to a confluence of factors, including destructive insect infestations leading to widespread tree mortality, prolonged and intensifying drought conditions, significant accumulations of dead and downed woody debris (windfall), and dense forest stands resulting from historical fire exclusion policies, which have also contributed to the proliferation of highly flammable dense brush regrowth. The characteristically dry climate and the prevalence of low-lying, easily ignitable vegetation further exacerbate the area's inherent susceptibility to wildfires, with a concerning high percentage of these ignitions being attributed to human activities.

Recognizing this substantial and multifaceted threat, the Tribe has proactively implemented various mitigation strategies aimed at lessening the overall wildfire risk. Wildfires on or around the LJIR pose a substantial risk, potentially causing widespread destruction of homes and other structures, devastating critical infrastructure such as **the Tribal Government complex, the water treatment and distribution system, the energy grid, and communication networks**, and severely hindering economic development initiatives, thereby significantly impacting the Tribal economy and the livelihoods of its members. The geographically isolated nature of the LJIR, coupled with limited access routes, further elevates the danger to residents and significantly complicates and potentially delays essential evacuation efforts.

The Preparedness component of the LJIR's wildland fire management program encompasses proactive planning and the systematic implementation of pre-ignition activities. This includes routine, year-round actions conducted in anticipation of each fire season, as well as specific activities implemented in direct response to increasing fire danger levels and evolving environmental conditions. The annual preparedness funding level is subject to variation based on assessed risk and is determined through a comprehensive Fire Planning process involving **the Tribal Council, the La Jolla Reservation Fire Department, the Environmental Protection Office, the Emergency Management Coordinator, relevant Tribal departments (e.g., Public Works, Housing), and in coordination with the Bureau of Indian Affairs (BIA) Fire Management.**

4.2.2 FIRE PREPAREDNESS ACTIVITIES

Pre-season preparedness actions are crucial for ensuring the La Jolla Reservation Fire Department (LJRFD) is ready to effectively respond to wildland fire incidents. These activities include, but are not limited to:

- **Conducting an annual fire refresher training for all personnel:** This training covers critical topics such as fire behavior updates, safety protocols, incident command system procedures, equipment operation and maintenance, and review of the Annual Operating Plan.

- **Administering physical fitness testing and providing ongoing training opportunities:** This ensures that all firefighting personnel meet the required physical fitness standards for their assigned duties, enhancing their safety and effectiveness on the fire line.
- **Reviewing and managing fire cache inventory and needs:** This involves a thorough inspection of all firefighting equipment, tools, and supplies to ensure they are in good working order, adequately stocked, and readily accessible. Deficiencies are identified and addressed through procurement or repair.
- **Conducting preparedness reviews and ensuring personnel qualifications are current:** This includes verifying that all firefighters possess the necessary certifications and qualifications for their roles, such as **Basic Firefighter (FFT2), Firefighter Type 1 (FFT1), Single Resource Boss (CRWB), and specialized qualifications like chainsaw operator (S-212) or engine boss (ENGB).** Any expiring qualifications or identified training gaps are addressed proactively.
- **Identifying and addressing specific training needs:** This involves assessing individual and crew training requirements based on performance evaluations, changes in regulations or tactics, and emerging risks. This may include arranging training for **advanced fire behavior (S-290), incident command system (ICS) courses (e.g., I-200, I-300), specialized equipment operation, or wildland urban interface tactics (S-215).**

4.3 NATIONAL FIRE DANGER RATING SYSTEM (NFDRS) PREPAREDNESS

The La Jolla Reservation Fire Department (LJRFD) will implement a National Fire Danger Rating System (NFDRS) plan to strategically guide preparedness and resource allocation decisions. This plan may be specifically tailored to the unique environmental conditions and fuel models present within the LJIR, or it may effectively utilize data and indices from neighboring established NFDRS plans that exhibit similar characteristics. The NFDRS will serve as a crucial tool for determining appropriate preparedness levels, adjusting daily and seven-day staffing requirements to match predicted fire danger, and identifying the need for and justification of severity funding actions during periods of heightened risk.

To ensure that all firefighting personnel have immediate access to critical fire danger information while on duty, they are required to carry pocket cards. These cards will contain key data points and interpretations derived from the LJIR or applicable neighboring NFDRS plan, including:

- **Current Fire Danger Rating:** Clearly indicating the present level of fire danger (e.g., Low, Moderate, High, Very High, Extreme).
- **Key NFDRS Indices:** Displaying the numerical values for relevant indices such as Burning Index (BI), Spread Component (SC), Energy Release Component (ERC), and Ignition Component (IC), providing a concise snapshot of current fire potential.
- **Interpretive Guides:** Brief explanations correlating the fire danger rating and NFDRS indices to potential fire behavior, expected rates of spread, and difficulty of control.
- **Pre-determined Actions:** Outlining pre-planned actions and restrictions associated with each fire danger level, such as burn permit suspensions, increased patrol frequencies, or enhanced equipment readiness checks.

Furthermore, the accuracy and reliability of the NFDRS indices are paramount for effective decision-making. To ensure data integrity, all Remote Automated Weather Stations (RAWS), both permanently installed within the LJIR and any portable units deployed for specific monitoring purposes, will undergo thorough annual maintenance in accordance with the guidelines and standards detailed in the Bureau of

Indian Affairs (BIA) Wildland Fire Management Program Guide ("Red Book"). This maintenance will include sensor calibration, battery checks, data transmission verification, and structural integrity inspections to guarantee the consistent and dependable collection of critical weather data that forms the foundation of the NFDRS.

4.3.1 PREPAREDNESS LEVELS

National, regional, and zone preparedness levels are established collaboratively by interagency coordinating groups. These levels are determined through a comprehensive assessment of current and forecast burning indices derived from NFDRS, ongoing wildland fire activity both locally and regionally, and the readily available firefighting resources. Resource availability is often a critical limiting factor in setting these levels. The specific situations and operational activities associated with each preparedness level apply to both wildland fire suppression and planned prescribed fire operations. The National Interagency Mobilization Guide and corresponding Geographic Area and Zone Mobilization Guides provide detailed definitions and operational parameters for each preparedness level. The La Jolla Indian Reservation is part of the **Southern California Geographic Area**, and the overall zone preparedness level for this region is typically determined by the **Southern California Geographic Area Coordination Center (GACC)**. While the GACC generally sets the overall zone preparedness level, individual agencies, including the La Jolla Reservation Fire Department, retain the flexibility to maintain a preparedness level that differs from surrounding agencies if localized fuel conditions, weather patterns, or fire activity are not uniform across the broader zone. In such instances, the reported overall zone preparedness level may reflect an average or a consensus of the preparedness levels reported by all participating agencies within the Southern California Geographic Area.

4.3.2 STAFFING LEVELS

Staffing levels for the La Jolla Band's fire management program are dynamically determined based on the National Fire Danger Rating System (NFDRS) indices, utilizing Fuel Models SH5 (Short Grass, Moderate Load) and SH4 (Shrub, 4-foot height) as the most representative for the LJIR. These fuel models are specifically modeled using real-time weather data obtained from the Poomacha and Cuca Ranch Remote Automated Weather Stations (RAWS), which serve as the primary source for informing appropriate staffing decisions for daily internal fire operations. Analysis of historical fire occurrence and correlating weather patterns on the LJIR has indicated that five distinct staffing levels are appropriate to effectively manage fire risk and potential incidents:

- **Level 1 (Minimum Staffing):** Represents the baseline daily staffing required during periods of low fire danger, capable of initial response to single ignitions under favorable conditions.
- **Level 2 (Moderate Staffing):** Indicates a slight increase in on-duty personnel and enhanced readiness during periods of moderate fire danger, allowing for a more robust initial attack capability.
- **Level 3 (Increased Staffing):** Activated during periods of high fire danger, this level involves a significant increase in on-duty personnel and equipment availability, with potential for pre-positioning of resources in high-risk areas.
- **Level 4 (Maximum Preparedness Staffing):** Implemented during periods of very high fire danger or Red Flag Warnings, this level entails the maximum available on-duty staffing and a

2295 heightened state of alert, with all personnel prepared for immediate response and potential
2296 extended operations.
2297 • **Level 5 (Augmented Staffing/Recall):** Reserved for extreme fire danger conditions or active
2298 multiple large incidents, this level may involve recalling off-duty personnel and potentially
2299 requesting mutual aid resources to bolster suppression efforts and provide adequate coverage.

2300 Specific quantitative details regarding the number of personnel assigned to each staffing level, along
2301 with corresponding trigger points based on NFDRS indices and other relevant factors, are
2302 comprehensively documented in the La Jolla Reservation Fire Department's Annual Operating Plan
2303 (AOP).

2304 4.3.3 FIRE CACHE

2305 The Bureau of Indian Affairs (BIA) Southern California Agency (CA-SCA) functions as the primary regional
2306 fire cache, providing a central repository for significant wildland fire resources. However, the La Jolla
2307 Indian Reservation Fire Department (LJIRFD) recognizes the critical need for readily accessible local
2308 resources and maintains its own fire cache. This local cache is, and will continue to be, strategically
2309 stocked with all essential items required to effectively support pre-season preparedness activities, swift
2310 initial attack operations, and sustained extended attack incidents within and around the Reservation.

2311 To ensure operational readiness, all consumable and expendable items utilized during wildland fire
2312 suppression activities will be promptly reordered and restocked through established BIA Fire Code
2313 ordering procedures. This ensures that critical supplies are replenished without delay. Furthermore, all
2314 preparedness-related items, such as **fire shelters, hand tools (e.g., shovels, Pulaskis, McLeods),**
2315 **personal protective equipment (PPE) components (e.g., gloves, goggles), fusees, flagging tape,**
2316 **batteries for radios and headlamps, and basic first aid supplies,** will be ordered and strategically
2317 stocked in the local cache prior to the start of each fire season using dedicated Preparedness funds.
2318 These inventory levels will be periodically and diligently checked by designated personnel to ensure
2319 adequate quantities are maintained throughout the year and that items are in good working order and
2320 have not expired.

2321 The Fire Management Officer (FMO) for the LJIRFD, in conjunction with the designated Cache Manager,
2322 holds the primary responsibility for ensuring that the local fire cache is consistently maintained in an
2323 appropriately secured, clean, and orderly manner. This includes proper storage of all items, regular
2324 inventory checks, and adherence to safety protocols within the cache facility.

2325 4.4 INCIDENT MANAGEMENT

2326 4.4.1 SUPPRESSION POLICY

2327 All wildland fire incidents occurring on the La Jolla Indian Reservation (LJIR) will be aggressively
2328 suppressed with a paramount and unwavering focus on the safety of all firefighters and the public. This
2329 commitment to safety will guide all operational decisions and tactical actions. Simultaneously,
2330 suppression efforts will also prioritize the protection of identified values at risk and the adherence to
2331 established resource management objectives for the Reservation's lands and resources. Suppression
2332 actions will be strategically and tactically conducted in a manner that minimizes inherent risks to

firefighting personnel while maximizing the overall effectiveness and efficiency of the fire suppression efforts. The Fire Chief, in close collaboration with a qualified Tribal Resource Advisor, will be responsible for clearly defining and regularly updating these "identified values at risk" (which may include homes, infrastructure, cultural sites, sensitive habitats, and economic assets) and "resource management objectives" (which may encompass goals related to forest health, watershed protection, wildlife habitat preservation, and traditional land use practices) within the operational context of wildfire suppression planning and incident response. These identified values and objectives will be communicated clearly to all responding personnel during incident briefings and will inform the development and implementation of suppression strategies and tactics.

4.3.2 Safety

Safety is paramount for all personnel engaged in or supporting fire management activities on the LJIR. This is a shared responsibility held by every individual involved, from the Incident Commander (IC) down to all fire line personnel. Wildland fire management work is inherently hazardous, and under no circumstances should the life of any individual be jeopardized to achieve faster fire suppression or to minimize the final fire size.

Key safety resources that provide guidance and protocols include:

The following resources provide critical guidance, protocols, and best practices to ensure the safety of all personnel during wildland fire operations on the La Jolla Indian Reservation:

- **Red Book (Wildland Fire Management Program Guide):** National Interagency Fire Center, Interagency Standards for Fire and Fire Aviation Operations. This comprehensive guide outlines the policies, procedures, and standards for wildland fire management within the Bureau of Indian Affairs, emphasizing safety as a paramount concern.
- **Local Job Hazard Analyses (JHAs):** Site-specific JHAs are developed and utilized for high-risk tasks such as chainsaw operation, chipper use, vehicle driving, and the proper use of personal protective equipment (e.g., gloves). These analyses identify potential hazards and outline mitigation measures to minimize risks.
- **Wildland Fire Incident Management Field Guide (PMS 210):** This guide provides essential information and procedures for managing wildland fire incidents, with a strong emphasis on safety considerations within the Incident Command System (ICS) framework.
- **Incident Response Pocket Guide (IRPG, PMS 461):** A quick reference guide containing critical safety information, operational guidelines, and tactical checklists for wildland fire personnel on the fire line.
- **NFES 1077: Introduction to Wildland Fire Behavior:** This publication provides foundational knowledge of wildland fire behavior principles, enabling personnel to better anticipate fire spread and intensity, crucial for making safe tactical decisions.
- **NWCG Fireline Handbook, Appendix B: Fire Behavior (NFES 2165):** This appendix offers detailed information on fire behavior characteristics, indicators, and predictive tools to enhance situational awareness and firefighter safety on the fire line.

4.4.2 RESPONSE TO WILDLAND FIRES

The response to each wildland fire ignition on the La Jolla Indian Reservation (LJIR) will be meticulously tailored to the unique and specific circumstances of the incident. This adaptive and risk-informed approach necessitates a thorough assessment of several key factors, including the prevailing

environmental conditions (e.g., weather, fuel moisture, topography), the precise location of the fire and its potential for spread, and a comprehensive identification of the critical values at risk (e.g., human life, property, infrastructure, cultural resources, sensitive ecosystems). Based on this comprehensive assessment, the response strategy may range from a swift and aggressive initial attack aimed at rapid containment and suppression to, in pre-designated and ecologically appropriate areas (e.g., within a designated Wildland Fire Management Unit - WFMU), carefully managing fires for specific resource benefits, such as ecological restoration or hazardous fuel reduction. In certain carefully evaluated conditions, the appropriate response may even involve close and continuous monitoring of the fire's natural progression, ensuring it remains within acceptable parameters and does not pose a threat to identified values.

A crucial element of this tailored response framework is the meticulous consideration and integration of critical environmental and resource constraints into the decision-making process when determining the most appropriate suppression strategy. These critical constraints include, but are not limited to, the known presence of critical habitat for federally or state-listed threatened and endangered species, clearly identified and mapped cultural resource areas (including archaeological sites and traditional use areas), locations with documented soil instability or high erosion potential, sensitive riparian areas, and other essential resource conditions as identified through Tribal resource inventories and environmental assessments.

Responsibility for identifying these critical constraints during an incident is a shared and collaborative effort. Prior to any fire incident, the LJIR's Wildland Fire Management Plan, Integrated Resource Management Plan (IRMP), and associated Geographic Information System (GIS) data layers serve as primary resources for proactively identifying known sensitive areas. During an active incident, the initial Incident Commander (IC) and responding resources will utilize this pre-existing information. Furthermore, **resource specialists**, including Tribal biologists, archaeologists, and environmental specialists (either assigned to the incident management team or consulted remotely), play a vital role in providing real-time information and guidance regarding the presence and sensitivity of these critical constraints within the incident area. Their expert input ensures that suppression actions are strategically planned and implemented to minimize potential adverse impacts on these irreplaceable resources. The IC holds the ultimate responsibility for incorporating this information into the tactical decision-making process, balancing suppression objectives with the imperative to protect the Reservation's valuable natural and cultural heritage.

4.4.3 SUPPRESSION PLAN

The Suppression Plan stands as a foundational and dynamic component of the Annual Operating Plan (AOP), meticulously outlining the specific actions, operational protocols, and strategic decision-making processes to be strictly followed during all wildland fire suppression activities undertaken on the La Jolla Indian Reservation (LJIR). This comprehensive plan is designed to ensure a safe, effective, and environmentally responsible response to every wildfire incident and includes the following critical elements:

- **Initial Attack Priorities and Criteria:** This section clearly defines the prioritized order of response to all reported fire ignitions on the LJIR. The prioritization is based on a dynamic assessment of several critical factors, including the fire's precise location, the immediate and potential threat it poses to identified values at risk, and the real-time availability of LJIR and cooperating agency

resources. The plan also specifies the predetermined level and type of resources to be initially deployed based on the initial report and risk assessment. **For example, fires that pose an immediate and direct threat to occupied structures, critical infrastructure (e.g., power lines, water facilities), or human life will receive the absolute highest priority for immediate and aggressive initial attack.** Secondary priority may be given to fires threatening sensitive cultural sites or critical habitats for threatened and endangered species, followed by fires burning in high-value timber stands or areas with high potential for rapid spread. The initial resource dispatch will be guided by pre-established matrices that correlate the initial fire report (e.g., smoke report, confirmed fire size, behavior) with the appropriate level of initial response (e.g., single engine, full wildland engine assignment, air resources).

- **Complexity Level Assessment:** This section establishes a standardized and systematic process for rapidly determining the complexity level of any wildland fire incident on the LJIR. This assessment is a continuous process, evolving as the incident unfolds and more information becomes available. The complexity assessment is based on a range of critical factors, including observed and predicted fire behavior (rate of spread, intensity), the inherent challenges posed by the terrain, the availability and logistical support requirements of assigned and potential resources, the number of agencies involved, the potential for significant social, economic, or environmental impacts, and the anticipated duration of the incident. This complexity assessment directly guides the level and type of incident management organization required to effectively manage the fire. The National Wildfire Coordinating Group (NWCG) has established a standardized system of incident complexity levels, ranging from **Type 5 incidents**, which are typically small and can be managed with local resources under a single Incident Commander (IC), to **Type 1 incidents**, which are large, complex, and require a highly skilled Type 1 Incident Management Team (IMT) with significant logistical support capabilities. The LJIR Suppression Plan will outline the criteria for classifying incidents at each of these levels (Type 5, Type 4, Type 3, Type 2, and Type 1) and the corresponding management structure that will be implemented.
- **Incident Command Structure:** This section clearly defines the established chain of command for managing all wildland fire incidents on the LJIR, adhering to the principles of the Incident Command System (ICS). It explicitly assigns roles, responsibilities, and lines of authority to designated personnel within this standardized organizational structure. The **initial Incident Commander (IC)** is typically the first qualified LJIRFD officer or designated individual to arrive on the scene of an incident. This individual is immediately responsible for scene safety, initial assessment, and the implementation of initial attack operations. As the complexity of the incident increases, the incident command may escalate, transitioning to a more formal ICS structure with the assignment of additional personnel to key roles such as Operations Section Chief, Planning Section Chief, Logistics Section Chief, and Finance/Administration Section Chief. This¹ escalation ensures that the management structure is commensurate with the demands of the incident. The Suppression Plan will include an organizational chart outlining the standard ICS structure utilized by the LJIRFD and clearly define the responsibilities associated with each key position within that structure.

The Suppression Plan will be subjected to a **formal annual review** to ensure its continued relevance and effectiveness in addressing the evolving fire environment, incorporating lessons learned from past incidents, and reflecting any changes in LJIR resources, personnel, or relevant interagency policies and best practices. Furthermore, a **review and potential adjustment will also occur after any significant wildland fire incident** on the LJIR to identify areas for improvement and ensure that the Suppression Plan remains a dynamic and adaptive tool for protecting the Reservation. This commitment to regular

review and adaptation ensures that the LJIR's fire suppression efforts are consistently informed by experience and best practices.

4.5 EMERGENCY STABILIZATION AND BURNED AREA REHABILITATION POLICY AND GUIDANCE

Specific policies and comprehensive guidance for Emergency Stabilization (ES) and Burned Area Rehabilitation (BAR) are detailed in the Bureau of Indian Affairs (BIA) Wildland Fire Management Program Guide, commonly referred to as the **Red Book**. It is critical to reference the most current version of this document, as Red Book page updates are issued on an annual basis, and policies and procedures are subject to change yearly. Emergency Stabilization (ES) and Burned Area Rehabilitation (BAR) treatments are both integral and crucial components of managing the aftermath of wildfire incidents on the LJIR; however, they are distinct in their timeframe, focus, and are programmed and funded through separate mechanisms. **Emergency Stabilization (ES) focuses on implementing immediate actions, typically within one year of fire containment, to address urgent post-fire threats to life, property, and critical natural and cultural resources. In contrast, Burned Area Rehabilitation (BAR) addresses longer-term recovery needs of the burned landscape, often implemented over several years, aiming to restore ecological function, stabilize soils, and repair or mitigate damage to infrastructure and resources.**

Reference documents that provide further guidance and policy direction include:

- **Interagency Burned Area Emergency Response (BAER) Guidebook (Feb. 2006):** Provides comprehensive guidance for assessing post-fire emergency threats and planning immediate stabilization measures on federal lands.
- **Interagency Burned Area Rehabilitation (BAR) Guidebook (Oct. 2006):** Offers detailed guidance for developing and implementing long-term rehabilitation plans for burned areas to promote ecological recovery and resource restoration.
- **Burned Area Emergency Response Team Standard Operations Guide (Jan. 2007):** Outlines standard operating procedures for Burned Area Emergency Response (BAER) teams during their assessments and the development of stabilization plans.
- **Department Manual Part 620, Chapters 1 & 3:** Generally, addresses **Wildland Fire Management Policy (Chapter 1)** and **Suppression and Preparedness (Chapter 3)** within the Department of the Interior.
- **Department Manual 516 Part 6, Appendix 4:** Pertains to **Trust Management Responsibilities** within the Department of the Interior, which is directly relevant to management of Tribal trust lands.
- **Indian Affairs Manual Part 90:** Provides overarching **Wildland Fire Management policies and procedures** specific to the Bureau of Indian Affairs and its responsibilities on Tribal lands.
- **25 United States Code of Federal Regulations (CFR), Section 163.28:** Specifically addresses **Wildland fire management on Indian lands**, outlining the responsibilities and authorities of the BIA and Tribes.
- **Interagency Incident Business Management Handbook:** Details the **fiscal and administrative procedures** for managing all aspects of wildland fire incidents, including the financial processes related to Emergency Stabilization and Burned Area Rehabilitation funding and cost accounting.

4.5.1 EMERGENCY STABILIZATION (ES)

2504 The primary purpose of Emergency Stabilization (ES) is to:

- 2505 • **Minimize immediate threats to life or property** that may arise as a direct result of wildfire
2506 impacts. **Examples of these threats include the increased risk of flash floods and debris flows**
2507 **due to loss of vegetation and soil instability, safety hazards posed by fire-weakened or dead**
2508 **trees (hazard trees) falling onto roads or structures, and potential damage to critical**
2509 **infrastructure.**
- 2510 • **Prevent further unacceptable degradation of natural and cultural resources** resulting directly
2511 from the effects of wildfire. **Examples of this degradation include accelerated soil erosion**
2512 **leading to loss of topsoil and sedimentation of waterways, the spread of invasive plant species**
2513 **into fire-affected areas, damage or loss of culturally significant sites and artifacts due to**
2514 **erosion or lack of protective vegetation, and the degradation of water quality.**

2515 ES focuses on implementing rapid and often temporary treatments to address these urgent post-fire
2516 threats, typically within a year following fire containment. A crucial principle of ES is to rely on natural
2517 recovery processes whenever feasible and when the anticipated rate and extent of natural recovery are
2518 deemed sufficient to mitigate the immediate threats effectively. **For example, in areas with light to**
2519 **moderate burn severity on gentle slopes with intact ground cover, natural revegetation may be**
2520 **sufficient to stabilize soils and prevent significant erosion without the need for immediate**
2521 **intervention.**

2522 **Assessment:**

2523 A prompt and thorough evaluation for the potential need for Emergency Stabilization (ES) will be
2524 conducted for **all** wildland fires that occur on the La Jolla Indian Reservation. This evaluation process
2525 typically involves an **initial assessment by the Incident Management Team (IMT) in coordination with**
2526 **Tribal resource specialists (e.g., natural resource managers, archaeologists).** This initial assessment
2527 **considers factors such as burn severity mapping, soil burn severity indicators, slope steepness,**
2528 **proximity to values at risk, potential for increased runoff, and the presence of sensitive resources.** If
2529 the initial assessment indicates a potential need for ES, a more detailed Burned Area Emergency
2530 Response (BAER) team assessment may be convened.

2531 **Guidance:**

2532 Refer to the following key policy and guidance documents for specific procedures and requirements
2533 related to Emergency Stabilization:

- 2534 • **BIA Supplemental Policy - Indian Affairs Manual Part 90:** Provides BIA-specific guidance on
2535 wildland fire management, including policies related to post-fire stabilization efforts on Tribal
2536 lands, emphasizing the protection of Tribal trust resources and consultation with the Tribe.
- 2537 • **Department of Interior Departmental Manual (DM) 620 DM 3:** Outlines the Department of the
2538 Interior's policies and procedures for **Emergency Stabilization and Rehabilitation of Lands**
2539 **Damaged by Wildfire**, providing the overarching framework for BIA actions.
- 2540 • **Interagency BAER Guidebook:** This comprehensive guidebook provides detailed procedures and
2541 best practices for **assessing post-fire emergency threats to life, property, and resources on**
2542 **federal lands**, including assessment techniques, analysis methods, and the development of
2543 stabilization plans.

- **Interagency Burned Area Rehabilitation (BAR) Guidebook:** Note: While this guidebook's primary focus is on long-term Burned Area Rehabilitation (BAR), it may contain some relevant information regarding initial assessments and the transition from emergency stabilization to longer-term recovery planning. It is a key reference document for the subsequent BAR phase.

Planning:

- An **Emergency Stabilization Action (ESA) plan** must be developed within **seven (7) days** of formal fire containment. This critical timeline ensures a rapid response to immediate post-fire threats. The responsibility for developing this plan typically rests with a **Burned Area Emergency Response (BAER) team**, if convened, or a designated team of resource specialists and fire management personnel assigned by the Agency Superintendent or Fire Management Officer (FMO) in consultation with the Tribe. Key elements typically included in the ESA plan, beyond the identification of stabilization needs and proposed treatments, are a clear articulation of **objectives, specific treatment prescriptions, implementation timelines, cost estimates, responsible parties for implementation, and a plan for monitoring the effectiveness of the implemented treatments.**
- The ESA plan comprehensively documents the thorough **stabilization needs assessment** conducted by the team and the specific **proposed treatments** designed to address those needs. **Examples of typical ES treatments include the installation of erosion control measures such as straw wattles, sediment fences, and temporary check dams; the aerial or ground application of emergency erosion control mulches or soil binders; the removal of hazardous trees that pose an immediate threat to safety; and the implementation of temporary measures to protect cultural sites from erosion or vandalism.**

Approval:

ESA plans are subject to the following levels of approval based on the total estimated cost of the proposed treatments:

1. **Agency Superintendent (of the La Jolla Agency, Bureau of Indian Affairs):** Approval authority for ESA plans with a total cost **up to \$250,000.**
2. **Regional Director (of the Pacific Regional Office, Bureau of Indian Affairs):** Approval authority for ESA plans with a total cost **up to \$500,000.**
3. **BIA Director, Branch of Wildland Fire Management, National Interagency Fire Center (NIFC):** Approval authority for ESA plans with a total cost **exceeding \$500,000.** NIFC serves as the national coordination center for wildland fire management resources and plays a crucial role in the oversight and funding of significant ES efforts across BIA lands.

Funding:

Funding for Emergency Stabilization (ES) efforts is typically provided at the national level through specific BIA budget allocations for post-fire emergency response. However, it is important to note that actual funding availability may be subject to overall budget limitations and the prioritization of needs across all BIA-managed lands. Funding requests are typically submitted through established BIA channels following the approval of the ESA plan. The timeframe for receiving funds can vary depending on the

urgency of the identified threats and the availability of national funding, but efforts are generally made to expedite funding for critical stabilization needs.

Compliance:

All Emergency Stabilization (ES) actions implemented on the La Jolla Indian Reservation must be in strict compliance with all **approved land management plans** relevant to the Reservation (such as the Integrated Resource Management Plan - IRMP), all **applicable BIA and Department of the Interior policies and standards**, and all relevant **federal, state, and local laws and regulations**, including environmental compliance requirements (e.g., National Environmental Policy Act - NEPA, Endangered Species Act - ESA, National Historic Preservation Act - NHPA).

4.5.2 BURNED AREA REHABILITATION (BAR)

The **Burned Area Emergency Response (BAER) Team** is a rapid assessment team comprised of interdisciplinary specialists (e.g., hydrologists, soil scientists, ecologists, engineers, archaeologists) primarily operating under the jurisdiction of the Department of the Interior (DOI). As highlighted in a BAER Team press release dated November 1, 2007, their **primary mission is to conduct timely assessments of federal lands impacted by recent wildfires to identify potential immediate threats to life, property, and critical cultural and natural resources**. A significant focus of BAER teams is evaluating the heightened risk of post-fire flooding and debris flows due to altered watershed conditions. **It is crucial to understand that the BAER team's primary role is assessment and the development of an Emergency Stabilization (ES) plan. While their findings often inform the need for longer-term recovery efforts, the actual implementation of Burned Area Rehabilitation (BAR) projects typically involves a separate process of planning, funding acquisition, and execution, often undertaken by agency or Tribal resource management staff.**

Following the 2007 Poomacha Wildfire, a BAER Team was deployed and provided an Emergency Stabilization (ES) Plan aimed at addressing immediate threats. Elements of the BAER team's assessment, as reflected in the 2007 Tribal mitigation strategy plan, identified potential longer-term impacts that would fall under the purview of Burned Area Rehabilitation (BAR). These included the prediction that during significant storm events, increased flooding and erosion would likely occur at low-water crossings, culverts, and other road sections due to the fire's effects on watershed conditions. The assessment noted the potential for flood events to erode and deposit sediment, organic debris, and boulders on roads, rendering them impassable and unsafe, necessitating ongoing maintenance and debris removal. Furthermore, the BAER assessment highlighted the risk of higher than regular flow events with increased sediment loadings impacting irrigation diversions (including Cedar Creek, Lower Cedar Creek, Western, and Yapitcha systems), potentially requiring increased maintenance to ensure proper functioning and minimize damage.

The primary purposes of Burned Area Rehabilitation (BAR) are:

1. **To comprehensively evaluate the actual and potential long-term post-fire impacts on critical cultural and natural resources and specifically identify those areas that are unlikely to recover naturally from severe wildfire damage within an acceptable timeframe. Examples of these long-term impacts include significant shifts in native vegetation composition, increased susceptibility to invasion by non-native and invasive plant species, long-term soil degradation**

and loss of soil productivity, alterations to hydrologic function and stream channel morphology, and lasting damage to or loss of culturally significant sites and traditional use areas.

2. To develop and implement cost-effective, science-based plans designed to emulate historical or pre-fire ecosystem structure, ecological function, biological diversity, and natural disturbance dynamics, consistent with approved land management plans (such as the LJIR's Integrated Resource Management Plan - IRMP). If achieving this historical emulation is not feasible due to irreversible changes or other constraints, the goal is to initiate rehabilitation efforts that steer the burned area toward a healthy, stable, and resilient ecosystem in which native species are well represented and ecological processes are functioning effectively. Examples of typical BAR treatments include reseedling with locally adapted native plant species, constructing erosion control structures such as contour wattles and check dams for long-term soil stabilization, implementing sustained invasive plant species removal and management programs, restoring damaged riparian areas and stream channels, and potentially relocating or protecting cultural resources at risk from long-term erosion or instability.
3. To repair or replace minor facilities directly damaged by wildland fire when emergency stabilization measures are insufficient for long-term functionality. Examples of "minor facilities" may include damaged fences, minor road or trail repairs beyond emergency stabilization, replacement of burned signage, or repairs to small water delivery systems.

The BAR plan will meticulously specify non-emergency treatments that are consistent with approved land management plans and are intended to be carried out generally within **three (3) years** following the formal containment of the wildfire. The La Jolla Agency and the La Jolla Band of Luiseño Indians, through their relevant natural resource and fire management departments, will collaboratively develop and implement cost-effective BAR plans. These plans will aim to emulate historical or pre-fire ecosystem attributes or, when infeasible, to restore or establish a resilient ecosystem dominated by native species and healthy ecological processes.

It is critical to understand that BAR projects are competitively funded among all four bureaus within the Department of the Interior (Bureau of Indian Affairs, Bureau of Land Management, National Park Service, and U.S. Fish and Wildlife Service).¹ Due to limited overall funding availability, there is **no guarantee** that proposed BAR treatments and activities will receive funding. Furthermore, BAR funds can typically only be provided for treatments implemented within the **three-year window** following the containment of the wildfire. Plans that request multi-year funding are not guaranteed full funding in each subsequent year; funding allocations are typically made on a yearly basis as specified in the approved BAR plan and ultimately approved by the national BAER/BAR coordinators. The **typical timeframe for submitting BAR proposals is generally within six to twelve months after fire containment**, allowing sufficient time for post-fire assessments and the development of comprehensive rehabilitation plans. BAR project proposals are evaluated and prioritized based on several criteria, including the severity and extent of resource damage, the potential for long-term negative impacts without intervention, the ecological significance of the affected area, the cost-effectiveness and feasibility of the proposed treatments, and the alignment with agency and Tribal land management objectives.

4.6 AIR QUALITY

Wildfire Smoke Impacts

Beyond the readily apparent aesthetic impact of reduced visibility, wildfire smoke presents a range of significant risks:

4.6.1. VISIBILITY IMPAIRMENT AND IMPACT ON EVACUATION AND EMERGENCY RESPONSE:

Smoke, particularly dense plumes, can severely restrict visibility across the landscape. This creates extremely hazardous conditions for both ground transportation and aviation. Critically, reduced visibility can severely impede wildfire evacuation efforts and the ability of emergency responders to navigate affected areas. This necessitates proactive planning and implementation of:

- o **Road Control Measures:** Law enforcement and emergency personnel must be prepared to implement immediate road control measures in areas affected by heavy smoke or active fire. This includes establishing traffic control points, managing congestion, and ensuring the safe flow of evacuating residents and incoming emergency vehicles.
- o **Detour Planning and Implementation:** Pre-planned and clearly communicated detour routes are essential to guide evacuees around areas with severely limited visibility or active fire. These routes should be well-marked and disseminated through various channels.
- o **Road Closures:** When visibility is critically low or roads are directly threatened by fire, swift and decisive road closures are necessary to prevent accidents and ensure public safety. Clear communication of road closures is paramount.
- o **Radio Communication for Evacuation Assistance:** Reliable radio communication networks are vital for coordinating evacuation efforts in smoky conditions. This includes:
 - **Emergency Responder Communication:** Ensuring seamless communication between fire crews, law enforcement, traffic control personnel, and evacuation center staff.
 - **Public Information Broadcasts:** Utilizing local radio stations and tribal emergency alert systems via text, email, and phone, to provide real-time updates on road closures, detour routes, evacuation orders, and safe travel practices in smoky conditions. These broadcasts should emphasize the dangers of reduced visibility and advise caution.
 - **Two-Way Radio for Evacuees (If Feasible):** In specific scenarios, providing two-way radios to key community members or evacuation leaders could enhance communication and coordination, especially in areas with limited cellular service.

The combination of reduced visibility and active fire can create chaotic and dangerous evacuation scenarios. Robust planning for road control, detours, closures, and effective radio communication is crucial to ensuring the safe and orderly evacuation of residents and the efficient deployment of emergency resources during wildfire events.

4.6.2 Human Health Impacts of Wildfire Smoke:

Wildfire smoke is a complex mixture containing fine particulate matter (PM_{2.5}), larger inhalable particles (PM₁₀), various gases (including carbon monoxide, nitrogen oxides, and volatile organic compounds), and water vapor. Inhalation of this smoke poses significant and well-documented threats to human health, particularly for vulnerable populations within the La Jolla Indian Reservation and surrounding communities. These sensitive groups include individuals with pre-existing respiratory conditions such as asthma and Chronic Obstructive Pulmonary Disease (COPD), those with cardiovascular disease (including heart disease and stroke), infants and young children whose respiratory systems are still developing, pregnant women, and older adults. Prolonged or intense exposure to wildfire smoke can significantly exacerbate these underlying health issues, trigger acute respiratory and cardiovascular events, increase susceptibility to respiratory infections (like bronchitis and pneumonia), and potentially have long-term health consequences. The health risks associated with wildfire smoke directly impact both the public residing within the La Jolla Indian Reservation and firefighters who may experience intense and prolonged exposure during fire suppression activities.

For comprehensive and up-to-date information regarding the specific health impacts of wildfire smoke within the La Jolla context, as well as detailed recommended protective measures tailored to the community, please refer to the La Jolla Band of Luiseño Indians Environmental Protection Office's dedicated Air Quality Program website:
https://www.lajollaindians.org/government/environmental_protection_office/air_quality_program.php.

Recommended protective measures, often detailed on the aforementioned website and consistent with public health guidance, may include:

- **Staying Indoors:** Reducing all outdoor physical activity, especially during periods of heavy smoke and elevated particulate matter concentrations. Creating a "clean air room" indoors with filtered air could be beneficial.
- **Using Air Purifiers:** Utilizing portable air filtration systems equipped with high-efficiency particulate air (HEPA) filters, which are effective at removing fine particulate matter (PM_{2.5}) from indoor air. Ensure the air purifier is appropriately sized for the room.
- **Wearing N95 Masks:** Properly fitted N95 respirators can provide a significant level of protection by filtering out a substantial portion of fine particulate matter when outdoor exposure is unavoidable. It's crucial to ensure a proper seal and understand that surgical masks or cloth face coverings offer limited protection against fine smoke particles.
- **Closing Windows and Doors:** Taking proactive steps to prevent smoke from entering indoor spaces by keeping windows and doors closed and sealing any significant gaps or cracks. Consider using the recirculation setting on vehicle air conditioners.
- **Monitoring Air Quality Reports:** Staying consistently informed about current air quality conditions by regularly checking reports from Tribal authorities, local air quality management districts, and relevant agencies (e.g., EPA's AirNow website or app). Understanding the Air Quality Index (AQI) and following any health advisories or alerts issued based on current conditions is essential.
- **Consulting Healthcare Providers:** Individuals with pre-existing respiratory or cardiovascular conditions, as well as parents of young children and the elderly, should consult their personal healthcare providers for specific guidance on managing their health and medications during wildfire smoke events. Proactive planning can help mitigate potential health impacts.

Factors Contributing to Smoke Production:

The volume, composition, and dispersion of wildfire smoke are influenced by a complex interplay of factors:

- **Fuel Loads:** Heavy and continuous concentrations of available fuels, encompassing both fine ground fuels (such as dry grasses, leaf litter, and pine needles) and heavier fuels (including logs, large branches, and dense brush), that burn intensely and/or undergo prolonged smoldering combustion are primary contributors to the largest volumes of smoke production. The specific type of vegetation burning and its moisture content significantly influence the characteristics of the smoke produced, including the size and chemical composition of the particulate matter. **Effective fuel management practices, such as strategically reducing fuel loads through thinning, prescribed burning, and mechanical removal, can play a crucial role in mitigating potential smoke production during future wildfires by reducing the intensity and duration of combustion.**
- **Atmospheric Conditions:** The prevailing atmospheric conditions have a profound impact on the movement and dispersion of wildfire smoke. Stable atmospheric conditions, particularly the presence of persistent temperature inversions (where a layer of warmer air aloft traps cooler, denser air near the surface), and low wind speeds severely hinder both the vertical lifting and horizontal dispersal of smoke. These stagnant conditions can lead to the significant accumulation of smoke in valleys, low-lying areas, and near the fire source, resulting in prolonged periods of poor air quality and reduced visibility. Conversely, unstable atmospheric conditions and stronger winds generally promote better smoke dispersion. **Weather forecasts, including predictions of temperature inversions, wind speed and direction at various atmospheric levels, and atmospheric stability indices, are critically important tools used by fire managers and air quality agencies to anticipate potential smoke impacts and implement appropriate mitigation strategies, such as adjusting burn times for prescribed fires or issuing public health advisories during wildfires.** Terrain features, such as mountains and valleys, can also significantly influence local smoke movement and trapping patterns, creating areas of higher smoke concentration even when broader atmospheric conditions might suggest better dispersion.

4.6.3 MANAGING SMOKE IMPACTS:

While direct control over wildfire-generated smoke at the source is often limited, the following mitigation measures can be implemented to reduce its impact on communities and firefighters within the La Jolla Indian Reservation:

- **Traffic Management and Safety:**
 - When visibility is significantly impaired in critical travel corridors due to smoke, proactive traffic management strategies are essential to enhance public safety. This includes:
 - **Implementing reduced speed limits** in affected areas, clearly indicated by temporary signage.
 - **Deploying warning signs** to alert drivers to the presence of heavy smoke and reduced visibility.
 - **Implementing temporary road closures** in situations of severely limited visibility or when roadways are directly impacted by fire activity.

- **Establishing and clearly marking detour routes** to safely guide traffic around affected areas.
- o Effective coordination and communication are paramount. The La Jolla Public Works Department, Tribal Police Department, and La Jolla Fire Department will establish clear protocols for coordinating traffic management efforts and disseminating critical information to the public through all available channels.
- **Public Health Protection and Communication:**
 - o Issuing timely, accurate, and culturally sensitive public health advisories is crucial to inform the community about potential health risks associated with elevated smoke levels and empower them to take protective actions. These advisories will be disseminated through multiple channels, including:
 - Local news outlets and radio stations (including the Tribal radio).
 - Official Tribal social media platforms and website.
 - Reverse 911 or other emergency alert systems.
 - Community bulletin boards and public service announcements.
 - o These advisories will clearly outline:
 - The potential health impacts of wildfire smoke, particularly for sensitive groups.
 - Specific and actionable recommended protective measures, such as staying indoors, closing windows and doors, using air purifiers with HEPA filters, and properly wearing NIOSH-certified respirators (e.g., N95).
 - Encouragement of voluntary limitations on strenuous outdoor activities for all residents.
 - Guidance directing vulnerable populations to designated cleaner air environments (if established).
 - o Effective collaboration is essential for crafting and disseminating these advisories. The Environmental Protection Office Air Quality Manager, Indian Health Council, Fire Department, CDC, and local health authorities will work together to ensure the information is accurate, consistent, and reaches all segments of the community.
- **Firefighter Health and Safety:**
 - o Ensuring the health and safety of firefighters during wildfire incidents with significant smoke exposure is a critical priority. Mitigation measures include:
 - **Establishing clearly marked and readily accessible designated smoke inhalation treatment stations** at Incident Command Posts (ICPs) equipped with necessary medical supplies and trained personnel.
 - **Providing all firefighters with appropriate and properly fitted respiratory protection**, such as N95 or P100 respirators, and ensuring they are trained in their correct use and limitations.
 - **Implementing a robust air quality monitoring program at the fire line** to assess smoke levels and inform tactical decisions regarding firefighter exposure.
 - **Establishing and enforcing mandatory work/rest cycles** that include periods of rest and recovery in cleaner air environments away from direct smoke exposure.
 - **Ensuring readily available medical personnel** at the ICP who are specifically trained in the recognition and treatment of smoke inhalation and other potential medical issues.
 - **Strictly requiring firefighters to immediately report any symptoms** such as fatigue, headache, confusion, dehydration, elevated heart rate, shortness of breath, or any other symptom that could indicate smoke inhalation or a severe

underlying medical condition. Protocols for immediate medical evaluation and treatment must be strictly followed.

4.7 SEVERITY AND SUPPORT ACTION FUNDING

The Bureau of Indian Affairs (BIA) Wildland Fire Management Program Guide, known as the **Red Book**, serves as the primary and authoritative source for detailed guidance regarding the specific criteria, standardized processes, and necessary documentation for requesting and effectively utilizing both Severity Funding and Support Action Funding within the BIA wildland fire management program. It is imperative that LJIR fire management personnel are thoroughly familiar with the relevant sections of the Red Book to ensure timely and appropriate access to these critical financial resources.

- **Severity Funding:** Severity Funding is a supplemental financial mechanism typically requested by BIA agencies, including the La Jolla Agency, during periods of **abnormal or extreme fire danger**. These periods are characteristically defined by a convergence of factors such as sustained high to extreme burning indices (as determined by the National Fire Danger Rating System - NFDRS), a significant increase in local and/or regional wildland fire activity that strains existing resources, and forecasts indicating continued elevated fire risk. The fundamental aim of Severity Funding is to provide proactive supplemental financial assistance to enable agencies to effectively prepare for and respond to the heightened threat of large and complex wildfires before they overwhelm local suppression capabilities. This dedicated funding can be strategically utilized for a range of proactive measures, including the **pre-positioning of critical firefighting resources (personnel and equipment) in anticipation of increased fire activity, extending the operational hours or increasing the overall staffing levels of fire personnel to enhance initial attack readiness, and covering other extraordinary and justifiable costs directly associated with the heightened fire risk and necessary preparedness measures (e.g., increased overtime, temporary logistical support).**

On the La Jolla Indian Reservation, the **Fire Management Officer (FMO)**, in close consultation with key fire management staff and potentially the Agency Superintendent, is primarily responsible for initiating a Severity Funding request when the established criteria for abnormal or extreme fire danger are met or anticipated. The approval process for Severity Funding typically involves a formal written request submitted through the BIA chain of command, starting with the **Pacific Regional Office of the Bureau of Indian Affairs**. The Regional Office will review the justification provided, assess the current and predicted fire danger and activity levels, and determine the appropriateness and necessity of the request. If approved at the Regional level, the request may then be forwarded to the **BIA's Branch of Wildland Fire Management at the National Interagency Fire Center (NIFC)** for final review and allocation of funds, particularly for larger funding requests or those impacting multiple regions. The specific timelines and documentation requirements for Severity Funding requests are detailed in the Red Book.

- **Support Action Funding:** Support Action Funding is primarily intended to cover essential **overhead costs** directly associated with managing large and complex wildland fire incidents. **Examples of such overhead costs include incident-related travel expenses for personnel, per diem for extended assignments, communication costs, and the operational costs of incident base camps (e.g., showers, sanitation).** This funding mechanism also facilitates the **purchase or rental of specialized equipment** that is deemed necessary for effective fire suppression or

logistical support but is not part of the agency's standard equipment inventory. **Examples of specialized equipment could include the rental of heavy equipment (e.g., bulldozers, excavators), the leasing of specialized communication systems, or the short-term rental of additional water tenders.** Furthermore, Support Action Funding is utilized to **fund the costs associated with deploying LJIR fire crews and other qualified resources to assist other jurisdictions** facing significant wildfire activity under established mutual aid agreements or formal resource sharing arrangements, ensuring that the LJIR can contribute to regional fire suppression efforts while having its deployment costs reimbursed. This includes covering the personnel costs, travel, and per diem for LJIR resources dispatched to assist other agencies. The specific procedures for requesting and utilizing Support Action Funding are detailed within the Interagency Incident Business Management Handbook, which complements the guidance provided in the BIA Red Book.

4.8 Bureau of Indian Affairs Responsibilities

The Bureau of Indian Affairs (BIA), as the primary federal agency with trust responsibility for Indian lands, holds significant and multifaceted responsibilities for managing, overseeing, and supporting safe and effective wildland fire protection programs on Indian lands, including the La Jolla Indian Reservation (LJIR). These responsibilities are distributed across various levels of the BIA organizational structure:

- **Secretary of the Interior:** As the head of the Department of the Interior (DOI), the Secretary holds the ultimate legal and administrative responsibility for all programs and activities within the Department, including the comprehensive management of wildland fire across all DOI-managed lands. This includes setting national policy, allocating budgets, and ensuring the overall effectiveness of federal fire management efforts.
- **Pacific Regional Office (PRO):** The Pacific Regional Office of the BIA exercises crucial oversight of the content, development, and approval processes related to forest and fire management planning documents within its designated geographic region, which encompasses the La Jolla Indian Reservation. Beyond plan approval, the PRO also plays a key role in **allocating federal fire management funding to agencies within the region, facilitating regional interagency coordination and agreements, providing technical expertise and support to field units like the Southern California Agency, and ensuring regional alignment with national BIA fire management policies and objectives.**
- **Southern California Agency (SCA):** The Southern California Agency of the BIA holds direct and primary responsibility for the on-the-ground implementation of fire management programs and activities specifically on the La Jolla Indian Reservation. This encompasses a wide range of critical functions, including:
 - **Implementing wildfire suppression strategies and tactical operations** on the LJIR, directly engaging in fire suppression efforts when necessary and coordinating with the La Jolla Fire Department.
 - **Coordinating fire management planning efforts and fostering interagency agreements** at both the regional level (with other federal, state, and local agencies) and the local level (directly with the Tribe and neighboring jurisdictions).
 - **Providing essential administrative and logistical support services** to the La Jolla Fire Department (LJFD). **The BIA Southern California Agency provides federal funding, policy guidance, and administrative support that enables the LJFD to operate effectively. While the LJFD is often staffed by Tribal employees and operates under Tribal direction for day-to-day incidents, it relies on the BIA SCA for federal program**

oversight, funding mechanisms, and access to federal resources and training opportunities.

- o **Developing and implementing the local geographic operation plan (as outlined in 90 IAM 1.7E(5)).** This local geographic operation plan serves as a **site-specific operational guide for wildland fire management on the LJIR, detailing pre-attack plans, resource availability, communication protocols, and specific tactical considerations unique to the Reservation's landscape and values at risk.**
- **BIA Regional Director:** Reporting directly to the Secretary of the Interior, the BIA Regional Director for the Pacific Region is accountable for the effective administration of all BIA fire management programs within the region. This includes ensuring alignment with national policies and strategic objectives, overseeing budget execution, and evaluating the overall performance and effectiveness of fire management activities across all BIA agencies within the Pacific Region.
- **Agency Superintendent:** The Agency Superintendent for the Southern California Agency holds direct responsibility to the Regional Director for the safe and effective implementation of all fire management activities specifically within the La Jolla Indian Reservation (LJIR). This critical role includes fostering and maintaining strong collaborative relationships and interagency cooperation with neighboring federal, state, and local jurisdictions, as well as ensuring strict adherence to all applicable federal, state, and Tribal regulations, policies, and agreements related to wildland fire management.
- **Regional Office Fire Management Officer (RFMO):** Serving as the primary point of contact and recognized subject matter expert within the Pacific Regional Office, the RFMO is responsible for all matters related to wildland fire management across the region. Their key responsibilities include facilitating the development and execution of regional interagency agreements, leading and coordinating regional fire management planning efforts, identifying and coordinating crucial training opportunities for agency fire personnel, providing expert technical guidance and operational support to field units such as the SCA and the LJIR, and conducting thorough evaluations of fire management program effectiveness and compliance within the Pacific Region.
- **BIA National Interagency Fire Center (NIFC):** Located in Boise, Idaho, NIFC provides essential national-level coordination, critical logistical support (including resource mobilization and allocation), and overarching policy guidance for BIA fire management programs across the entire country. NIFC plays a vital role in assisting regional offices and individual agencies, including the SCA and the LJIR, in developing and implementing safe, efficient, and effective fire management programs, and it is the central hub for national resource mobilization and coordination during periods of significant wildland fire activity and resource shortages.

Key Documents Guiding BIA Fire Management on the LJIR:

- **BIA Southern California Tribes Prevention Management Plan:** This plan outlines specific strategies, tactical approaches, and cooperative agreements aimed at wildfire **prevention** (e.g., public education, enforcement, risk assessments) and **pre-suppression management** (e.g., fuels reduction projects, early detection) on Tribal lands within Southern California, including detailed sections relevant to the La Jolla Indian Reservation.
- **Annual Fire Mobilization Plan:** This document details the preparedness posture and specific resource mobilization plans for the upcoming fire season specifically for the LJIR. It includes critical information on pre-determined staffing levels, the readiness status of firefighting equipment and apparatus, communication protocols, and the step-by-step procedures for

requesting and deploying additional resources (personnel, equipment, aircraft) through both BIA channels and interagency agreements.

- **Arson Investigation Plan:** This plan provides comprehensive guidance and standardized protocols for thoroughly investigating and effectively responding to incidents of suspected arson occurring on the LJIR. It includes detailed procedures for evidence collection and preservation, establishing clear lines of communication and coordination with Tribal and federal law enforcement agencies, and outlining the processes for potential prosecution of arson cases.
- **Red Book (BIA Wildland Fire Management Program Guide):** As previously mentioned, this foundational document serves as the cornerstone of BIA fire management policy and procedures, containing comprehensive information on all aspects of wildland fire management, including organizational roles and responsibilities, operational guidelines, funding mechanisms, safety protocols, and interagency cooperation. It is the primary reference for all BIA fire management activities, including those on the La Jolla Indian Reservation.

5. FUELS MANAGEMENT PLAN

The La Jolla Band's approach to planned fuels treatments, a critical and integrated component of the overall Fire Management Plan, is detailed in this chapter. It describes the guiding policies and regulations (**Section 5.1**), the ecological and historical context of the landscape that necessitates these treatments (**Section 5.2**), the overarching goals (**Section 5.3**) and specific, measurable objectives (**Section 5.4**) that drive the program, and the organizational framework for effective planning and implementation (**Section 5.5**). The chapter also integrates the crucial role of silvicultural prescriptions in achieving fuel management objectives within forested stands (**Section 5.6**) and discusses the strategic development of the Fuels Management organization to enhance capacity and meet future landscape-scale challenges (**Section 5.7**).

5.1 FUELS POLICY AND GUIDANCE

The La Jolla Band recognizes the critical role of fire in maintaining healthy wildland ecosystems, aligning with the principles outlined in the Healthy Forest Initiative 2002, the Cohesive Strategy, the Interagency Prescribed Fire Guide, and the BIA Fuel Management Handbook. While increased use of fire as a land and resource management tool is endorsed, the current state of the landscape may necessitate the use of other fuel treatment methods, such as mechanical thinning, biological control (e.g., targeted grazing by cattle or goats to reduce fine fuels, or the potential introduction of native insects known to control invasive *Arundo donax* or *Scotch broom*), and chemical treatments. Regarding chemical treatments, the Tribe prioritizes methods that minimize non-target impacts and adheres to strict application guidelines, developed in consultation with Tribal members, the Environmental Department, and relevant specialists. All chemical applications will be carefully evaluated and documented. These methods may be employed independently or in combination with prescribed fire to achieve desired fuel reduction and ecological objectives. Mechanical thinning and prescribed fire will be implemented across the La Jolla Indian Reservation (LJIR). These activities, which may include brush disposal following timber harvests, stand density reductions, and natural hazard fuel reductions, will be subject to further analysis and approval through site-specific National Environmental Policy Act (NEPA) documents. This NEPA analysis involves assessing potential environmental impacts of proposed fuels treatments, considering a range of alternatives (including no action), and incorporating public input to ensure informed decision-making.

The authority for designing and implementing a robust fuels management program originates from a multi-layered framework of national, regional, and tribal level policies and directives, including but not limited to:

- The National Indian Forest Resources Management Act of 1990 (NIFRMA) is the primary federal law authorizing funds for managing Indian forest lands. It establishes the U.S. government's trust responsibility for these lands and directs the Secretary of the Interior to manage them sustainably, adhering to tribal forest management plans developed with substantial tribal input.
- Regulations at Title 36, Part 219 of the Code of Federal Regulations (36 CFR 219.27): These regulations explicitly specify that management prescriptions within forest plans must, consistent with the relative resource values involved, actively minimize serious or long-lasting hazards arising from wildfire. While these regulations directly govern National Forest System lands, they represent a benchmark for responsible and proactive fire management planning, emphasizing the need to mitigate wildfire risks to valuable resources, a principle that is equally relevant to the sustainable management of tribal lands.
- Bureau of Indian Affairs Manual Part 90 Chapter 1: This BIA manual provides specific guidance and regulations directly relevant to fire management on tribal lands. Key topics covered include the BIA's responsibilities in wildland fire management, funding mechanisms available for tribal fire programs, procedures for developing fire management plans, and protocols for interagency coordination and cooperation in fire suppression and prevention efforts.
- La Jolla Band of Luiseno Indians 2025 Fire Management Plan and Southern California Agency 2001 Fire Management Plan: These existing fire management plans provide foundational guidance specific to the La Jolla Reservation and the broader Southern California Agency. The La Jolla Band's 2025 Fire Management Plan prioritizes the protection of the Wildland-Urban Interface (WUI) through targeted fuel reduction projects around communities and critical infrastructure. The Southern California Agency's 2001 plan emphasizes interagency cooperation and resource sharing in fire management across the region.
- La Jolla Band of Luiseno Indians Draft 2025 Forest Management Plan, La Jolla Band of Luiseño Indians 2017 California Cooperative (NRCS) Forest Management Plan, and Southern California Agency 2015 Forest Management Plan: These forest management plans offer additional context and direction for integrated resource management, including fuels management considerations. The La Jolla Band's Draft 2025 Forest Management Plan outlines specific vegetation management goals aimed at reducing fuel loads in high-risk areas. The 2017 Cooperative Plan with NRCS emphasizes collaborative strategies for forest health and fuel management, leveraging NRCS technical and financial assistance.
- National Cohesive Wildland Fire Management Strategy: This national strategy provides a unified framework for wildland fire management, built upon three key components: Resilient Landscapes, Fire Adapted Communities, and Safe and Effective Wildfire Response. The LJIR's fuels management program directly aligns with the "Resilient Landscapes" component by actively working to reduce hazardous fuels across the reservation, thereby creating ecosystems that are more resistant to severe wildfire and can recover more quickly.

Interagency Policy:

This Fuels Management Plan directly supports the overarching vision of the National Cohesive Strategy: "To extinguish fire safely and effectively when needed; use fire where allowable; manage our natural resources; and as a nation, to live with wildland fire." Furthermore, all prescribed fire burn plans will be meticulously developed and implemented under the explicit direction of the comprehensive guidelines

outlined in the **Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide (NWCG, PMS 484, May 2022)**, ensuring adherence to national best practices and safety standards. [Consider adding a sentence about the Tribe's involvement or collaboration with NWCG in developing or implementing these guidelines, such as participation in training programs or contributing to best practice development.]

Here's a revised version of Section 5.2, incorporating your suggested additions and clarifications:

5.2 AREA DESCRIPTION

Understanding the ecological and historical context of the La Jolla Indian Reservation Forest is crucial for effective fuels management planning. The La Jolla Indian Reservation Forest has a documented history of experiencing several high-severity wildfires, resulting in significant resource damage, ecological impacts, and tragic loss of life and property. For example, the **2007 Poomacha Fire** burned approximately **7,500 acres**, impacting significant portions of the Reservation, destroying homes, and causing substantial damage to cultural resources and wildlife habitat. Similarly, the **2003 Paradise Fire** also affected tribal lands, highlighting the recurring threat. Historical patterns clearly indicate that the most severe wildfire losses tend to occur during the months of October and November, coinciding with dry conditions and strong Santa Ana winds. However, it is crucial to recognize that fire activity can occur throughout the year, and large, wind-driven wildfires have the potential to ignite and spread rapidly in any month. The Reservation's geographical proximity to expanding residential areas and the continuing development within the sensitive wildland-urban interface (WUI) create particularly challenging situations where the potential for catastrophic property damage and loss of life remains alarmingly high.

The low and intermediate elevations of the La Jolla Indian Reservation Forest, consistent with much of Southern California, are characterized by a Mediterranean-type climate. This climate is marked by relatively mild winters with limited precipitation, averaging approximately **Average Annual Rainfall 14 inches annually**, followed by long, hot, and exceptionally dry summers with average high temperatures ranging from **85-95 degrees Fahrenheit** and often exceeding 100 degrees for extended periods. This creates an extended period of high fire danger typically lasting from late spring through fall.

Historically, both traditional cultural burning practices and natural ignitions from lightning have played significant roles in shaping the Reservation's fire regimes. Estimated fire return intervals in the Mixed Hardwood Conifer Forest range approximately every 7 to 12 years, while grassland fire intervals are estimated at 2 to 4 years, and Chaparral ecosystems historically experienced fire intervals of 5 to 7 years. These historical fires in the Mixed Hardwood Conifer and Chaparral ecosystems were often mixed-severity events, creating a mosaic of vegetation patches. Traditional cultural burning, practiced by the Luiseño people for centuries, served various purposes, including promoting the growth of specific food and medicinal plants, improving habitat for game, reducing fuel loads around villages, and facilitating travel. These burns were typically low-intensity surface fires, carefully managed to achieve specific ecological and cultural objectives. However, the significant population expansion from urban centers into the mountainous regions, beginning in the late 1800s, necessitated a fundamental alteration of these natural fire systems. Aggressive fire suppression actions were implemented to reduce the immediate threat to burgeoning human life and property. This sustained suppression, while protecting immediate values, has disrupted the crucial functional roles of fire across the landscape. Consequently, without the frequent low-intensity fires that historically maintained ecosystem health, wildfires have become increasingly destructive, characterized by high severity, stand-replacing crown

fire behavior that propagates at higher rates and with greater frequency in the now denser and more continuous forests. Furthermore, the proliferation of non-native grasses, such as ***Bromus diandrus* (ripgut brome) and *Avena barbata* (slender oat)**, which lack the superior erosion control and watershed recharge qualities of most native grasses, has exacerbated the problem. These non-native species often create a fine, continuous fuel layer that dries out quickly, making them significantly more receptive to accidental ignition, particularly along heavily used road and highway corridors, and can contribute to faster fire spread.

5.3 GOALS

The Fuels Management Program is guided by overarching goals that align with national strategies and directly address the specific needs and ecological context of the La Jolla Indian Reservation. As explicitly outlined in the National Cohesive Wildland Fire Management Strategy, achieving the national goals for wildland fire management necessitates effectively addressing four broad and interconnected challenges:

- * Managing vegetation and fuels to reduce wildfire hazards and enhance ecosystem resilience. *
- Proactively protecting homes, communities, and other identified values at risk from the impacts of wildfire. *
- Strategically managing human-caused ignitions, which represent a significant percentage of all wildfire starts. *
- Ensuring a safe, effective, and efficient response to all wildland fire incidents. The top goals for the La Jolla Indian Reservation Forest directly address how fire management impacts both the Tribal communities and the health and resilience of the forest ecosystems:

- **Goal 1.1:** Significantly improve the ability of tribal communities to effectively limit the tragic loss of life and property and to facilitate rapid and comprehensive recovery from the inevitable high-intensity wildland fires that are an inherent and natural component of the region's ecological processes. Specific, measurable targets related to this goal may include **reducing the number of structures lost to wildfire by 25% within the next ten years** and **decreasing the average time for community recovery following a significant fire event to within two years through proactive planning and resource allocation.**
- **Goal 1.2:** Actively restore and maintain the overall health and ecological integrity of the Forest in areas where the long-term alteration of natural and cultural fire regimes has placed both human communities and critical natural resource values at unacceptable levels of risk. Examples of "critical natural resource values" on the LJIR include **culturally significant plant species like white sage (*Salvia apiana*) and basketry materials such as deergrass (*Muhlenbergia rigens*), important wildlife habitats for species like the California spotted owl and mountain lion, and key watershed areas that supply vital water resources to the Tribe.**

To effectively achieve these critical goals and provide enhanced protection and long-term ecological resiliency across all lands under our stewardship, fuels management activities must be deeply and strategically integrated into the annual Forest management planning and implementation strategies.

5.4 OBJECTIVES

To achieve the overarching goals, the Fuels Management Program has established specific and measurable objectives that guide the planning and implementation of fuel treatment projects. Strategic fuels management directly addresses the multifaceted challenges outlined in the national and tribal goals. The primary overarching objective of the La Jolla Indian Reservation Forest Fuels Management

Program is to proactively create tangible opportunities for greater success in all aspects of wildland fire management. These crucial opportunities are realized when clear patterns in ignition sources, prevailing weather conditions, potential fire behavior, and realistic expectations for the effectiveness of control measures are thoroughly understood and strategically incorporated into project design and implementation. Fuels reduction projects will be specifically designed to significantly reduce the occurrence of unplanned ignitions and to actively enhance the fire resilience of landscapes that have been shaped by fire for millennia. A comprehensive understanding of the diverse vegetation groups present across the Forest and their respective historical and current fire regimes is absolutely critical for effective fuels management. Treatment prescriptions must be carefully customized to factor in both the existing ecological conditions and the desired future conditions for each area. This necessitates acknowledging the reality that some areas are significantly departed from their historical fire regimes and may require a carefully planned combination or succession of various treatment methods, coupled with active and ongoing maintenance, to ensure that initial efforts are not lost over time. Examples of vegetation groups present on the LJIR include **Oak Woodlands**, historically characterized by frequent, low-intensity surface fires; **Chaparral**, with a historical fire return interval of 5-7 years and mixed-severity fire regimes; and **Mixed Conifer Forests** at higher elevations, which historically experienced longer fire return intervals and a mix of fire severities. Current conditions in many of these areas show increased fuel loads and a higher proportion of dense, continuous vegetation due to fire suppression. Specific objectives of the LJIR Forest Fuels Management Program include:

- **Hazardous Fuels Reduction:** Design and implement effective hazardous fuels reduction treatments to significantly reduce the unacceptable risk and potentially devastating consequences of wildfire to both tribal communities and critical ecosystem components. Specific, measurable targets for fuels reduction include **treating at least 200 acres annually within the Wildland-Urban Interface (WUI) and reducing average surface fuel loading by 30% (measured in tons per acre) in identified priority areas within the next five years.**
- **Ecosystem Restoration and Maintenance:** Restore and actively maintain healthy and resilient ecosystems through the strategic application of appropriate hazardous fuels treatments that mimic natural processes. For example, prescribed fire will be used in oak woodlands to promote native grass and forb regeneration and reduce shrub encroachment, mimicking historical low-intensity fire regimes. Targeted mechanical treatments will be employed in dense chaparral stands to create fuel breaks and reduce the risk of large, high-severity fires, while also creating opportunities for native plant recruitment. Invasive non-native species like **[Refer back to the specific species mentioned in Section 5.2, e.g., *Bromus diandrus*]** will be specifically targeted for removal through a combination of manual, mechanical, and potentially biological control methods to restore native plant communities.
- **Safety Enhancement:** Proactively promote the safety of all firefighters, tribal employees, and the general public through the safe and effective implementation of fuels management projects, comprehensive training programs, and targeted community outreach initiatives. Specific safety protocols include **establishing "red flag" trigger points based on weather conditions (e.g., sustained winds over 25 mph, low relative humidity below 15%) that will halt or modify operations** and providing **annual S-130/S-190 basic wildland firefighter training, as well as advanced training opportunities, for all participating personnel.**
- **Protection of Administrative Areas:** Reduce naturally occurring fuels and hazardous fuel accumulations in the immediate vicinity of key administrative areas and critical infrastructure to minimize the risk of loss. These areas include the **Tribal Government Complex, the La Jolla Elementary School, the Tribal Fire Department facilities, communication towers on [Specific Mountain Name], and water pumping stations along [Specific Creek Name].**

- **Integration with Land Management:** Seamlessly incorporate fuel treatment activities with other ongoing land management practices, such as sustainable timber harvesting, to achieve broader tribal goals and objectives through a holistic and integrated management approach. For example, following timber harvesting operations, slash piles will be promptly treated through chipping or burning, and thinning operations will be designed to reduce ladder fuels and increase stand spacing, thereby reducing the risk of crown fire initiation and spread.
- **Integration with Fire Management Planning:** Fully integrate fuel management planning processes with the comprehensive Fire Management Plans and proactive Wildfire Prevention Plans to ensure a cohesive and strategic approach to fire management. This integration is achieved through shared risk assessments that identify high-priority areas for both prevention and fuels management, the use of consistent prioritization criteria for project development across all fire management activities, and the collaborative development of projects that address both fuel hazards and ignition risks.
- **Interdisciplinary Collaboration:** Plan and implement all hazard fuel reduction projects in a collaborative and interdisciplinary manner, actively engaging with Tribal members, other Federal, State, and local partner agencies, and relevant stakeholders. Key partner agencies and Tribal departments include the **Bureau of Indian Affairs (BIA) Forestry and Wildland Fire Management, CAL FIRE, the Tribal Council, the Environmental Department, the Cultural Resources Department, and potentially adjacent landowners and community organizations.**
- **Public Education and Outreach:** Host and actively participate in numerous outreach events and public education initiatives to enhance community understanding of wildfire risks, the benefits of fuels management, and individual and collective responsibilities in creating fire-adapted communities. This public education is considered absolutely critical to the long-term success and acceptance of the fuels management program. Examples of outreach events and topics covered include **annual Firewise workshops for homeowners on creating defensible space and hardening their homes, community meetings and presentations on the objectives and methods of planned prescribed burns, and the distribution of educational materials (brochures, website information) on wildfire preparedness and evacuation planning.**

5.5 FUELS MANAGEMENT PLANNING AND ORGANIZATION

Effective planning and a well-defined organizational structure are essential for the successful implementation of the Fuels Management Program. Achieving sustained success in Fuels Management necessitates a strong and interconnected framework encompassing comprehensive planning, efficient implementation, secure funding, accurate reporting, and the continuous retention and professional development of skilled personnel. The **Fuels Management Team**, in close collaboration with the Fire Chief and Tribal Administration, is primarily responsible for developing the annual Program of Work (POW).

Planning & Long-Term Vision:

- **Increase Cultural Harvesting:** Actively increase opportunities for traditional cultural harvesting practices to promote fire-dependent gathering activities, fostering both cultural preservation and natural fuel reduction. For example, the program will collaborate with the Cultural Resources Department to identify areas where low-intensity fire can enhance the availability of

basketry materials like **deergrass** or promote the growth of medicinal plants such as **white sage**. This may involve coordinating prescribed burns in specific locations and at appropriate times to support these practices, followed by communication to Tribal members about harvesting opportunities.

- **Enhance Community Partnerships:** Significantly increase community partnerships aimed at creating and sustaining fire-wise communities through education, outreach, and collaborative projects. Specific types of community partnerships or projects include hosting **neighborhood chipper days** to assist residents with defensible space creation, organizing **community defensible space projects** focused on clearing vegetation around critical infrastructure or vulnerable neighborhoods, and establishing a **Tribal Firewise Council** with resident participation to promote fire safety awareness and action.
- **Develop Landscape-Scale Projects:** Develop and implement large-landscape fuels management projects focused on treating extensive areas within critical watersheds that exhibit high values at risk and contain large accumulations of older-age class fuels that represent an unhealthy departure from historical fire return intervals. Specific critical watersheds on the LJIR, such as the **[Insert Specific Watershed Name 1, e.g., San Luis Rey River Headwaters]** and **[Insert Specific Watershed Name 2, e.g., Pauma Creek Watershed]**, are prioritized due to their importance for water supply, sensitive riparian habitats, and the presence of significant cultural resources. These areas often contain dense stands of chaparral or overgrown oak woodlands with high fuel loads.
- **Foster Interagency Prescribed Fire Partnerships:** Actively partner with Federal, State, Local, and private stakeholders to collaboratively plan and safely execute prescribed fire projects that transcend jurisdictional boundaries, achieving landscape-scale benefits. The LJIR currently partners with agencies such as the **United States Forest Service (USFS)** and **CAL FIRE** on joint training exercises and potential cooperative burning projects in adjacent National Forest or State Responsibility Areas. These partnerships allow for the sharing of resources, expertise, and personnel, enabling larger and more effective prescribed fire treatments that address landscape-level fuel continuity.
- **Establish an Interagency Fuels Leadership Coalition:** Develop an Interagency Fuels Leadership Coalition to foster collaborative land management projects aimed at reducing hazardous fuels adjacent to communities, restoring the health and resilience of timber and chaparral ecosystems, expanding the capacity of fuels organizations to maximize treatment opportunities, and increasing community outreach and education efforts. Potential members of this coalition include representatives from the **La Jolla Tribal Council, the La Jolla Natural Resources Department (including Forestry and Fire Management), the Bureau of Indian Affairs (BIA) Wildland Fire Management, CAL FIRE, the US Forest Service (if applicable), the local Fire Safe Council, and representatives from neighboring communities or landowners**. The goals of this coalition will include developing shared priorities for fuels management across jurisdictional boundaries, coordinating funding applications, and streamlining project implementation.

A clear and widely accepted long-term vision and strategy are absolutely critical for an effective Fuels Management program, as all supporting elements derive from this foundational understanding. Projects will be designed to be realistic and achievable within the constraints of personnel time, available skills, and allocated funding. Whenever possible, projects will complement ongoing efforts on adjacent non-tribal lands through strong partnerships with cooperating agencies and local fire safe councils. The capacity of Contracting Officer Representatives (CORs) will be clearly defined, and long-term maintenance needs will be proactively accounted for as new projects are initiated. Specialized skills, including Prescribed Fire Burn Boss qualifications and proficient technical writing abilities, will be

identified, actively developed within our workforce, and considered in the creation of specialized positions. The program will prioritize maintaining current certifications and encouraging the professional development of new personnel to ensure the program's continued functionality as employees transition.

Annual planning will center around the Program of Work (POW), which is developed in conjunction with each grant application. Each project funded through a grant is typically implemented over a period of 1 to 4 years. Current project prioritization is primarily based on the level of life and safety hazard. The primary tool for tracking project progress and accomplishments is the 'BIA Annual Forest Development Proposal Report', an Excel-based spreadsheet that is updated annually with information on allocated funds, acres treated, and the specific types of treatments implemented. Additionally, comprehensive financial and quarterly project reports are maintained for all funding sources. This detailed record-keeping will also serve as a valuable archive for future managers, providing a historical reference of projects planned and completed over the years. The official Fuels Management implementation documents are currently housed within the La Jolla Reservation Natural Resources Department, located at 501 Cemetery Road Building A. Our current Program of Work includes projects scheduled for the years 2024-2027. It is important to recognize that this POW is a dynamic document that will require regular review and updates. Changes in administration, funding availability, prevailing weather patterns, the effectiveness of mechanical treatments, and the impacts of wildland fires will necessitate an annual review and potential revision of this plan. The fundamental concept guiding the POW is that the plans for the initial years (Years 1 and 2) will be relatively firm to allow for the securement of funding, allocation of personnel time, and identification of qualified project leads. Plans for later years will remain more flexible and adaptable as conditions evolve.

- **a. Facilitate Long-Term Vision:** Continue to actively develop and refine the long-term vision for interagency prescribed fire partnerships and establishing an interagency fuels leadership coalition (Section 5.5).
- **b. Facilitate Interagency Communication:** Enhance interagency communication and coordination through active participation in the wildland fire training cadre and other relevant interagency planning meetings, supporting the objective of interdisciplinary collaboration (Section 5.4).

5.6 ADDITIONAL FUELS & FIRE POSITIONS NEEDED

The proposed additions to the existing Fuels organization are strategically justified to enhance program capacity and efficiency.

5.6.1 PRESCRIBED FIRE AND FUELS SPECIALIST:

This crucial position will significantly increase the program's capacity for planning complex fuels reduction projects and provide essential operational support for the prescribed fire program (as detailed in **Section 5.7**). Key responsibilities include:

- Providing expert oversight to the prescribed fire program.
- Assisting in the development of comprehensive burn plans (**Section 5.7.1**).
- Coordinating Burn Boss refresher training (Workforce Development goal, **Section 5.5**).

- 3314 • Fulfilling other critical prescribed fire-related duties (**Section 5.7.2**).
- 3315 • Assisting with in-depth fuels and risk analysis (Strategy in Prioritizing Projects, **Section 5.5**).
- 3316 • Effectively monitoring treatment outcomes (**Section 5.8.2**).
- 3317 • Ensuring efficient fleet management (**Section 5.9.3**).
- 3318 • Coordinating fuels and burn boss training initiatives (Workforce Development goal, **Section 5.5**).
- 3319 • Actively engaging in shared stewardship and cross-boundary project development (Collaborative Shared Stewardship goal, **Section 5.5**).
- 3320 • Directly supervising the Equipment Operator and Fuels Technician(s), providing additional capacity for COR duties (Planning & Long-Term Vision, **Section 5.5**).
- 3321 • Bringing valuable fire behavior analysis expertise to the fuels program.
- 3322 • Strategically assisting interagency collaboration in identifying and prioritizing critical fuels reduction projects (Strategy in Prioritizing Projects, **Section 5.5**).
- 3323 • Contributing to the effective fleet management of heavy equipment operations, ensuring efficient project implementation and adherence to established timelines (Planning & Long-Term Vision, **Section 5.5**).

3329 **5.6.2 FUELS TECHNICIAN(S):**

3330 These essential positions will directly support the Natural Resources Director with critical fieldwork
 3331 required for fuels projects, including thorough data collection (**Section 5.5** - Spatial Data, **Section 5.9.2** -
 3332 Live Fuel Moisture Collection), accurate documentation, and timely reporting (**Section 5.5** - Annual items
 3333 and deadlines, Planning & Long-Term Vision). The Fuels Technicians will be actively supported in
 3334 pursuing relevant educational opportunities to meet the requirements for the 401 series forestry
 3335 technician positions, fostering professional growth and enhancing their technical skills (Workforce
 3336 Development goal, **Section 5.5**). These positions will report to the Prescribed Fire and Fuels Specialist.

3337 **5.6.3 EQUIPMENT OPERATOR:**

3338 This dedicated position will be responsible for the safe and efficient operation and routine maintenance
 3339 of all equipment within the fuels program's inventory (**Section 5.9.3**), ensuring the operational readiness
 3340 and longevity of critical mechanical treatment resources (Increase Pace and Scale of Treatments goal,
 3341 **Section 5.5**). This position will report to the Prescribed Fire and Fuels Specialist.

3342 **5.6.4 EMERGENCY COMMUNICATIONS DISPATCHER**

3343 To ensure the seamless and effective coordination of all fire management and response activities,
 3344 including equipment deployment, resource allocation, and crucial communication during prescribed
 3345 burns and other treatments, there is a critical need for a dedicated **Emergency Communications**
 3346 **Dispatcher**. This position would serve as a central point of contact, working in close coordination with
 3347 the Equipment Operator, the Prescribed Fire and Fuels Specialist, and other relevant personnel. The
 3348 Fuels Management Dispatcher would be responsible for tracking equipment availability and location,
 3349 facilitating timely deployment to treatment sites, managing communication between field crews and
 3350 supervisory staff, and maintaining accurate records of equipment utilization and operational status. This
 3351 dedicated dispatch function will significantly enhance the efficiency and safety of fuels management
 3352 operations, directly supporting the goal of increasing the pace and scale of treatments (Section 5.5) by
 3353 optimizing resource coordination and minimizing logistical delays.

3354 **5.7 ANNUAL ITEMS AND DEADLINES FOR COMPLETION:**

Task	Deadline
Submit Annual Smoke Management Plan to AQD	January 1st
Live Fuel Moistures (LFMs) collection	January 1st
New grants/agreements initiated	Rolling basis
Obtain LFMs from Forest	February 1st
Obtain LFMs from Forest	March 1st
Fire and Forestry Quarterly Community Updates	March 31st
Program of Work and new contracts initiated	June 1st
Obtain LFMs from Forest	June 15th
Fire and Forestry Quarterly Community Updates	June 31st
Obtain LFMs from Forest	July 1st
Obtain LFMs from Forest	July 15th
Obtain LFMs from Forest	August 1st
Obtain LFMs from Forest	August 15th
Obtain LFMs from Forest	September 1st
Fire and Forestry Quarterly Community Updates	September 31st
Burn plans needing tech review to SCA	September 15th
Obtain LFMs from Forest	October 1st
Burn plans to SCA	October 15th
Obtain LFMs from Forest	October 15th
Obtain LFMs from Forest	November 1st
Burn plans signed by AA	November 15th
Obtain LFMs from Forest	November 15th
Fire and Forestry Quarterly Community Updates	December 31st

3355 **5.8 Prescribed Fire:**

3356 The development and maintenance of a comprehensive Fire Management Plan are mandated for all
 3357 areas with burnable vegetation by the Departmental Manual, Indian Affairs Manual (IAM) Part 90, and
 3358 established Federal Wildland Fire Management Policy (as discussed in **Section 5.1**). Specifically, IAM Part
 3359 90 Chapter 2 Section 2.1 directs that these plans, "within the framework of tribal land use objectives,
 3360 document management strategies based on resource values to be protected or enhanced, while
 3361 implementing hazardous fuels reduction treatments," directly aligning prescribed fire with the goals
 3362 outlined in **Section 5.3**.

3363 Hazardous fuels management activities can be strategically addressed through a comprehensive Fire
 3364 Management Plan, integrated into a broader Land Management Plan that incorporates key Fire
 3365 Management Plan elements (as mentioned in the Integration with Land Management objective in
 3366 **Section 5.4**), or via a dedicated stand-alone Fuels Management Plan that is consistent with the
 3367 overarching Fire Management Plan (as mentioned in the Integration with Fire Management Planning
 3368 objective in **Section 5.4**). Given that hazardous fuels management is a necessary component of fire

management actions, all policies and procedures related to fire management planning directly apply to fuels management planning efforts, ensuring a cohesive and strategic approach.

The primary purpose of thorough fuels management planning is to translate broad resource goals and specific objectives (**Section 5.3** and **Section 5.4**) into practical management strategies tailored to each designated fire management unit, zone, or other relevant ecological unit within the Reservation. This planning process will clearly define suitable tactical approaches, establish project priorities (Strategy in Prioritizing Projects, **Section 5.5**), identify critical resource values at risk or to be enhanced, acknowledge operational constraints, and articulate the desired future conditions for treated areas (discussion of vegetation groups and desired future conditions, **Section 5.4**). The management plan will comprehensively address the full range of potential fuels management actions (**Section 3.2**), include well-defined fuel treatment schedules (**Section 5.7**), establish clear guidelines for prioritizing treatment areas (Strategy in Prioritizing Projects, **Section 5.5**), and analyze workload to determine necessary staffing levels (Plan for the Future Fuel's Organization, **Section 5.5**). The Fuels Treatment Selection Guide serves as a valuable resource for informed project selection at the tribal level.



Photo 4. Cultural and Rx Burn Day 2024

5.9 BURN PLANS:

Beginning in 2026, aligning with the annual planning cycle (**Section 5.5**), all comprehensive burn plans will be formally submitted to the BIA Fuels Officer for review by October 15th annually. Following submission, the BIA Fuels Officer will coordinate a meeting with the Agency Administrator to collaboratively discuss proposed prescribed fire projects and obtain the necessary annual signatures in Elements 1 and 2A of the burn plans, ensuring proper authorization and interagency coordination (Interdisciplinary Collaboration objective, **Section 5.4**). All burn plans must be accompanied by relevant NEPA documentation (NEPA planning process, **Section 5.5**), which will be reviewed for changes in environmental conditions at least every five years to ensure continued compliance and environmental stewardship.

All new burn plans will be meticulously developed using the standardized LJIR Prescribed Fire Burn Plan template, ensuring consistency and completeness. This process will be guided by the Interagency Prescribed Fire Planning and Implementation Guide (PMS 484) for essential best practices and procedural guidance (**Section 5.8.1**). To allow sufficient time for thorough technical review, incorporation of comments, and completion of necessary edits before the final burn plan deadline, all new burn plans requiring an initial Technical Review must be submitted to the BIA Fuels Officer by September 1st.

6. FIRE PREVENTION PLAN

This section outlines the framework for a robust Fire Prevention Plan, designed to minimize the risk of human-caused wildfires within the La Jolla Indian Reservation. The plan emphasizes proactive measures, clear responsibilities, community engagement, and integration with existing safety protocols to protect lives, property, cultural resources, and natural resources.

This Fire Prevention Plan has been developed to work in conjunction with the Hazard Risk Reduction Emergency Action Plans and Tribal Safety Programs. A key objective is to proactively review all planned vegetation clearing activities, scheduled contractor work, business operations, community events, and residential practices to ensure adherence to national fire and life safety standards, as well as specific Tribal fire safety regulations and traditional ecological knowledge. Implementing robust fire prevention measures aims to significantly reduce the incidence of fires by systematically eliminating potential opportunities for the ignition of flammable materials.

6.1 GOALS

The primary goals of the Fire Prevention Plan are to:

- **Reduce Human-Caused Ignitions:** Implement comprehensive strategies, education, and enforcement to significantly decrease the number of wildfires caused by human activities within the La Jolla Indian Reservation.
- **Protect Life and Property:** Minimize the risk of fire-related injuries, fatalities, and damage to homes, infrastructure (including critical facilities), and culturally significant resources.

- **Preserve Natural and Cultural Resources:** Safeguard the Reservation's valuable ecosystems, including forests, chaparral, riparian areas, and sensitive habitats, as well as cultural sites and traditional use areas, from the damaging effects of wildfire.
- **Enhance Community Awareness and Responsibility:** Educate residents, visitors, and contractors about fire safety practices, the importance of fire prevention, and their individual and collective roles in protecting the Reservation.
- **Promote Interagency Cooperation and Resource Sharing:** Foster strong collaboration and communication with neighboring federal, state, and local agencies, including CAL FIRE, the BIA Fire Management, the U.S. Forest Service, and local fire departments, to coordinate fire prevention efforts, share resources, and enhance overall fire safety on and around the Reservation.
- **Ensure Regulatory Compliance and Uphold Tribal Sovereignty:** Adhere to all applicable federal, state, and Tribal regulations related to fire prevention, while asserting and exercising Tribal sovereignty in the development and enforcement of fire safety measures specific to the unique needs and circumstances of the La Jolla Indian Reservation.
- **Integrate Traditional Ecological Knowledge:** Incorporate relevant traditional ecological knowledge and practices related to fire management and land stewardship into the Fire Prevention Plan, recognizing the historical role of fire in the ecosystem and the wisdom held within the Tribal community.

6.2 OBJECTIVES

To achieve these goals, the following objectives will be pursued:

- **Develop and Implement a Comprehensive Fire Prevention Strategy:** This strategy will include specific proactive actions, measurable timelines, assigned responsibilities, and performance indicators for all aspects of fire prevention, encompassing education, enforcement, engineering controls, and community engagement.
- **Establish Clear Responsibilities and Communication Pathways:** Clearly define the roles and responsibilities of all Tribal departments, personnel, community members, visitors, and contractors in fire prevention activities, and establish effective communication pathways for reporting hazards, sharing information, and coordinating efforts.
- **Conduct Regular Inspections and Proactive Hazard Mitigation:** Implement a systematic program for inspecting facilities, activities, and equipment for potential fire hazards, and proactively implement mitigation measures to reduce identified risks. This includes regular inspections of defensible space around structures.
- **Provide Effective Public Education and Outreach:** Develop and deliver culturally relevant and targeted fire prevention messages to various audiences (residents, youth, elders, visitors, contractors) through diverse communication channels, including community meetings, workshops, social media, signage, and traditional communication methods.
- **Maintain and Improve Fire Prevention Infrastructure:** Ensure that firebreaks, fuel breaks, signage (including fire danger rating signs), water sources, and other fire prevention infrastructure are properly maintained, strategically located, and regularly updated.
- **Promote Safe Work Practices and Operational Procedures:** Implement and strictly enforce fire safety protocols for all work activities conducted by Tribal employees and contractors, including construction, maintenance, vegetation management, cultural practices involving fire, and operation of vehicles and equipment.

- **Manage Vegetation to Reduce Fuel Loads and Enhance Ecosystem Health:** Implement a comprehensive vegetation management program, in coordination with fuels reduction efforts and ecological restoration goals, to strategically modify fuel characteristics and minimize the risk of fire ignition and spread, while considering traditional land management practices.
- **Enhance Fire Patrol Capabilities and Coverage:** Equip and train fire patrol personnel with the necessary resources, technology, and authority to effectively monitor high-risk areas, enforce regulations, and provide initial response to potential fire incidents. Explore the use of community fire watch programs.
- **Utilize Technology for Fire Prevention and Early Detection:** Explore and employ advanced technologies, such as remote sensing (satellite and drone imagery), fire detection systems, weather monitoring stations, and data analysis tools, to enhance fire risk assessment, early detection capabilities, and situational awareness.
- **Integrate Traditional Ecological Knowledge and Practices:** Actively engage Tribal elders and knowledge holders to incorporate relevant traditional ecological knowledge and fire management practices into the Fire Prevention Plan and related activities.
- **Evaluate and Continuously Improve the Plan:** Regularly assess the effectiveness of the Fire Prevention Plan through data analysis, after-action reviews of fire incidents, community feedback, and best practices research, and make necessary revisions and updates to ensure its ongoing relevance and effectiveness.

6.3 RESPONSIBILITIES

Effective fire prevention requires the active participation and commitment of everyone within the La Jolla Indian Reservation. The following outlines key responsibilities for different groups:

6.3.1 MANAGEMENT (TRIBAL COUNCIL, TRIBAL ADMINISTRATION, DEPARTMENT HEADS):

- o Develop, implement, and maintain a comprehensive Fire Prevention Plan.
- o Allocate adequate financial, personnel, and equipment resources for all fire prevention activities.
- o Ensure that all Tribal personnel receive appropriate and ongoing fire prevention training.
- o Establish and nurture strong cooperative relationships with external fire agencies and neighboring jurisdictions.
- o Regularly monitor the effectiveness of the Fire Prevention Plan through data analysis and incident reviews, implementing necessary revisions and improvements.
- o Enforce all Tribal fire prevention regulations and policies consistently and fairly.
- o Promote a strong culture of fire safety and individual responsibility throughout the Tribal government and community.

6.3.2 FIRE PATROL (TRIBAL FIRE DEPARTMENT, DESIGNATED PERSONNEL):

- o Conduct proactive, regular, and strategic patrols of high-risk areas to monitor environmental conditions, identify potential fire hazards, and enforce fire prevention regulations.

- 3505 o Engage with community members, visitors, and contractors during patrols to educate
- 3506 them about fire safety practices and relevant Tribal regulations.
- 3507 o Issue warnings and citations for violations of Tribal fire safety ordinances and policies.
- 3508 o Promptly and accurately report any observed potential fire hazards or actual fire
- 3509 incidents to the appropriate authorities.
- 3510 o Maintain all assigned patrol vehicles and equipment in a state of optimal operational
- 3511 readiness.
- 3512 o Collaborate with other Tribal departments on fuel reduction projects, community
- 3513 education initiatives, and emergency preparedness exercises.

3514 6.3.3 SUPERVISORS (DEPARTMENT HEADS, PROGRAM MANAGERS, PROJECT LEADERS):

- 3515 o Ensure that all personnel under their supervision receive thorough and job-specific
- 3516 training on fire prevention procedures and the safe operation of equipment.
- 3517 o Strictly enforce all applicable fire safety regulations and policies within their respective
- 3518 departments, programs, and work areas.
- 3519 o Conduct regular safety meetings and briefings that include specific and relevant
- 3520 discussions on fire prevention topics, current fire risks, and emergency procedures.
- 3521 o Immediately report any identified potential fire hazards or fire-related incidents within
- 3522 their areas of responsibility to management and the Tribal Fire Department.
- 3523 o Ensure that all equipment used by their personnel is properly maintained, operated
- 3524 safely according to manufacturer's instructions, and equipped with required safety
- 3525 devices, such as approved spark arrestors.
- 3526 o Serve as role models by consistently adhering to all fire prevention guidelines and
- 3527 promoting a safety-conscious work environment among their teams.

3528 6.3.4 ALL COMMUNITY MEMBERS, RESIDENTS, VISITORS, AND CONTRACTORS:

- 3529 o Adhere strictly to all Tribal fire safety regulations and policies, including burn bans,
- 3530 smoking restrictions, and guidelines for permitted activities involving fire.
- 3531 o Exercise extreme caution and personal responsibility when using fire for any purpose or
- 3532 operating equipment that could generate heat or sparks.
- 3533 o Immediately report any observed potential fire hazards (e.g., unattended fires, illegal
- 3534 burning, downed power lines, suspicious smoke) or actual fire incidents to the Tribal Fire
- 3535 Department (emergency number) or other Tribal authorities.
- 3536 o Actively participate in fire prevention education programs and community outreach
- 3537 initiatives to enhance their knowledge and awareness of fire safety.
- 3538 o Maintain defensible space around their homes and properties according to established
- 3539 Tribal guidelines to significantly reduce the risk of wildfire impacting structures and
- 3540 improve firefighter safety.
- 3541 o Be constantly aware of the current fire danger levels and any associated restrictions or
- 3542 advisories issued by Tribal authorities or relevant agencies.
- 3543 o Cooperate fully with fire patrol personnel, law enforcement, and emergency responders
- 3544 during incidents and preventative measures.
- 3545 o Contractors working on the Reservation bear the primary responsibility for adhering to
- 3546 all Tribal fire prevention regulations and ensuring that their employees, equipment, and
- 3547 operational procedures comply fully with this Fire Prevention Plan and any specific

3548 contract requirements. They must also submit their own fire prevention plans to the
3549 Tribe for review and approval and ensure seamless coordination with the Tribal Fire
3550 Department.

3551 6.4 GUIDANCE FOR TRIBAL EMPLOYEES & VISITORS ON SMOKING

3552 This guidance outlines the specific responsibilities and precautions all Tribal employees must follow
3553 regarding smoking to prevent wildfires and protect Tribal lands, resources, and structures. Our traditions
3554 emphasize a deep respect for the land and the well-being of our community. Preventing fire is a shared
3555 responsibility that directly upholds these core values.

3556 6.4.1 SMOKING RESTRICTIONS AND DESIGNATED AREAS:

- 3557 • **General Prohibition:** Smoking is strictly prohibited in all areas where flammable materials are
3558 present or where it poses a significant fire risk, including but not limited to:
 - 3559 o All buildings and enclosed structures owned or operated by the Tribe.
 - 3560 o Vehicles owned or leased by the Tribe.
 - 3561 o Storage areas for fuel, chemicals, explosives, and other flammable or combustible
3562 substances.
 - 3563 o All areas with dry vegetation, including grasslands, forests, brush, agricultural fields, and
3564 roadside areas.
 - 3565 o Construction sites, maintenance areas, and any outdoor work areas where ignition of
3566 materials is possible.
 - 3567 o During periods of elevated or high fire danger as officially declared by Tribal authorities
3568 or relevant external agencies (e.g., CAL FIRE). During such periods, a complete ban on
3569 outdoor smoking may be implemented Reservation-wide.
 - 3570 o Within a specified distance (e.g., 50 feet) of any building entrance, exit, or ventilation
3571 system to protect air quality and prevent accidental ignition.
- 3572 • **Designated Smoking Areas (if permitted):** If the Tribe designates specific outdoor smoking
3573 areas, these areas will be clearly marked with signage and will strictly adhere to the following
3574 criteria:
 - 3575 o Located in areas that are completely cleared of all flammable vegetation and other
3576 combustible debris within a minimum radius of [Specify distance, e.g., 25 feet].
 - 3577 o Equipped with non-combustible, enclosed receptacles (e.g., metal cans with tight-fitting
3578 lids, specifically designed ashtrays secured to the ground) for the safe and complete
3579 disposal of cigarette butts, ash, and any other smoking-related materials.
 - 3580 o Located away from building entrances, exits, and ventilation systems to prevent smoke
3581 from entering enclosed spaces and to minimize the risk of accidental ignition of building
3582 materials.
 - 3583 o The Tribe reserves the absolute right to eliminate designated smoking areas entirely at
3584 any time based on prevailing fire risk conditions, community health concerns, and
3585 overall safety considerations.

3586 6.4.2 SAFE SMOKING PRACTICES:

- **Use Designated Areas Only:** When smoking is explicitly permitted in officially designated areas, employees must use these areas exclusively and ensure they remain within the cleared perimeter.
- **Never Smoke Near Flammable Materials:** Absolutely avoid smoking near gasoline, propane tanks, solvents, paints, brush piles, wood piles, dry grass, leaf litter, or any other materials that can easily ignite. Maintain a safe distance significantly greater than the cleared area around designated smoking locations when flammable materials are nearby.
- **Extinguish Completely:** Ensure that cigarettes, cigars, and pipes are completely extinguished before disposal. Douse butts and ashes with water or sand within the designated receptacle to ensure no smoldering embers remain. Do not simply flick ashes or discard butts without confirming they are fully extinguished.
- **Proper Disposal:** Dispose of all smoking materials (cigarette butts, ashes, matches, lighters) responsibly and only in the designated non-combustible receptacles. Never throw them on the ground, in regular trash cans (unless the can contains a dedicated, non-flammable ashtray), or out of vehicle windows.
- **Be Acutely Aware of Wind Conditions:** Exercise extreme caution when smoking outdoors, especially on windy days. Wind can carry hot embers long distances, igniting dry vegetation or other flammable materials far from the smoking location. Refrain from smoking outdoors entirely during strong wind events, particularly during periods of high fire danger.
- **Report Hazards Immediately:** Promptly report any observed unsafe smoking practices by others or any potential fire hazards related to smoking (e.g., discarded butts in non-designated areas, individuals smoking near flammable materials) to your immediate supervisor, designated safety personnel, or the Tribal Fire Department.

6.5 WILDFIRE PREVENTION AWARENESS:

- **Collaborate with BIA for Signage:** Actively work with the Bureau of Indian Affairs (BIA) Fire Management to obtain and strategically place additional fire prevention signage throughout the La Jolla Indian Reservation, particularly in high-risk areas and along roadways, to raise awareness among residents and visitors.
- **Understand and Respect Fire Danger Levels:** Pay close attention to and fully understand the posted fire danger levels (Low, Moderate, High, Very High, Extreme) and any associated restrictions or advisories implemented by Tribal authorities or relevant external agencies. Increased fire danger levels may trigger stricter smoking restrictions or a complete ban on all outdoor smoking.
- **Maintain Vigilance and Report Immediately:** Be constantly aware of your surroundings for any signs of smoke or fire, no matter how small. Report any such observations immediately to the Tribal Emergency Services (911 or designated Tribal emergency number) or the Tribal Fire Department. Early detection and reporting are crucial for effective fire response.
- **Participate in Fire Safety Training and Education:** Actively participate in any fire safety training sessions, workshops, or educational programs offered by the Tribe or partner agencies. These programs are designed to enhance your understanding of fire prevention principles, emergency procedures, and your role in protecting the community.

6.5.1 VEHICLE FIRE SAFETY DURING DRY WEATHER:

During periods of dry weather and high fire risk, employees and residents experiencing a vehicle fire must prioritize safety and be aware of the heightened potential for igniting surrounding vegetation. Training should emphasize the following critical decision-making process:

- o **Primary Goal: Occupant Safety:** The immediate and absolute priority is the safe and swift evacuation of all occupants from the vehicle. Do not hesitate to exit the vehicle if there is any indication of fire or smoke.
- o **Secondary Goal: Preventing Wildfire Ignition:** Once all occupants are safely away from the vehicle, assess the immediate surroundings for dry vegetation or other flammable materials.
- o **Safe Stopping Location (If Possible):** If possible and safe to do so *before* the fire becomes uncontrollable, attempt to steer the vehicle to a location that minimizes the risk of igniting surrounding vegetation. This could include paved areas, gravel shoulders, or areas with sparse or no dry vegetation. **However, never delay evacuation to move the vehicle if there is an immediate threat to occupants.**
- o **Pulling Off-Road (High Risk):** Pulling off the road into dry vegetation should be an absolute last resort and only considered if there is no other way to safely exit the vehicle or if leaving the vehicle in the roadway poses an immediate and significant hazard to other traffic with no clear line of sight (less than 500 feet in both directions). If forced to stop in vegetation:
 - Exit the vehicle immediately and move away from the vehicle and any nearby vegetation.
 - Do not attempt to retrieve personal belongings if it delays evacuation.
- o **Attempting to Suppress the Fire (If Safe and Trained):** Only attempt to extinguish the vehicle fire if:
 - You have a readily accessible and functioning fire extinguisher specifically rated for vehicle fires.
 - You have been properly trained in its use.
 - The fire is small and contained to the engine compartment or a wheel well.
 - You can do so without putting yourself or others at risk.
 - If the fire is large, spreading rapidly, or involves the passenger compartment or fuel tank, **do not attempt to extinguish it.** Move to a safe distance and await the arrival of emergency responders.
- o **Reporting the Fire:** Once safely away from the burning vehicle and any potential fire spread, immediately report the fire to the Tribal Emergency Services (911 first then tribal fire department if able), providing your exact location and a description of the situation.
- o **Staying Safe:** Remain at a safe distance from the burning vehicle, considering potential explosions or the spread of fire to the surrounding vegetation, until emergency responders arrive. Follow their instructions.

6.6 CONSEQUENCES OF NON-COMPLIANCE:

Failure to comply with this smoking guidance or any other provision of this Fire Prevention Plan can result in disciplinary action for Tribal employees, up to and including termination of employment, in accordance with Tribal personnel policies. Furthermore, individuals (employees, residents, visitors, or contractors) may be held liable for any damages, including the cost of fire suppression and resource loss,

caused by fires resulting from their gross negligence or violation of Tribal fire safety regulations and laws.

Remember, preventing wildfires and protecting our Tribal lands, resources, cultural heritage, and the safety of our community is a collective and paramount responsibility. By diligently adhering to these guidelines and remaining vigilant, we can all contribute to a safer and more secure future for the La Jolla Indian Reservation.

If you have any questions or require clarification regarding this guidance or any aspect of the Fire Prevention Plan, please contact the Tribal Fire Department or Human Resources.

7.0 ARSON INVESTIGATION PLAN

This Arson Investigation Plan (hereafter referred to as "the Plan") serves as the foundational document establishing the standardized protocols and procedures for the thorough investigation of all wildland fires suspected of being intentionally ignited, commonly known as arson, within the jurisdictional boundaries of the La Jolla Indian Reservation (LJIR). Its direct applicability extends to all sworn and non-sworn personnel of the La Jolla Reservation Fire Department (LJRFD) and the La Jolla Tribal Law Enforcement Agency, ensuring a unified and coordinated approach to these critical investigations. Furthermore, this Plan explicitly guides the involvement, delineates the specific roles, and clarifies the responsibilities of the Bureau of Indian Affairs (BIA) Law Enforcement Services, as well as other relevant BIA programs and staff, when conducting wildland fire investigations occurring on Tribal trust lands, individually held trust and restricted Indian lands falling under the BIA's administrative purview, and any other lands within the Reservation's exterior boundaries where federal jurisdiction may apply. Recognizing the collaborative nature of land management and public safety, this Plan's principles and procedures may also be applicable to external entities carrying out activities on behalf of the BIA through various contractual agreements, cooperative agreements, or under the authority of Public Law (P.L.) 93-638 (the Indian Self-Determination and Education Assistance Act) contracts, particularly if such applicability is explicitly stipulated within the terms of those agreements or otherwise mandated by governing law. While Compact Tribes operating under the distinct authority of self-governance compacts may not be strictly legally obligated to adhere to the specific policies articulated herein (the extent of which is contingent upon the specific language contained within their individual compacts), they are strongly encouraged to recognize the inherent value and adopt this Plan and the underlying BIA policy as a robust framework and valuable guidance for conducting their own arson investigations, thereby fostering consistency and promoting effective practices across Indian Country. Moreover, other federal agencies and programs that maintain involvement in the administration and protection of Indian forest resources and related assets are likewise encouraged to ensure that the standards, methodologies, and best practices meticulously prescribed within this Plan are consistently met within their respective spheres of operation. This proactive alignment across jurisdictional boundaries is essential to promote a cohesive and effective approach to wildland fire investigation, ultimately enhancing the safety and security of the La Jolla Indian Reservation and its valuable resources.

7.1 POLICY

It is the firmly established policy of the La Jolla Indian Reservation (LJIR), in unwavering alignment with the overarching policies and directives of the Bureau of Indian Affairs (BIA) and the United States

Department of the Interior (DOI), to diligently adhere to and fully comply with all pertinent and applicable federal, Tribal, state, and local laws, established policies, and procedural requirements in order to conduct thorough, impartial, and objective wildland fire origin and cause determinations on all wildfire incidents occurring within the Reservation's jurisdiction, with a particular emphasis and heightened scrutiny applied to those incidents where intentional ignition (arson) is suspected. This fundamental policy commitment encompasses several key operational principles:

- **Effective Interagency Collaboration:** The LJIR is committed to working effectively and fostering robust collaborative relationships with all appropriate jurisdictional authorities, including but not limited to Tribal law enforcement and investigative agencies, BIA Law Enforcement Services and fire management personnel, federal law enforcement agencies (such as the Federal Bureau of Investigation (FBI)), state fire investigation agencies, and local law enforcement and fire departments, as deemed necessary and appropriate throughout the entirety of the investigation process. This collaborative approach ensures the efficient sharing of information, resources, and expertise, leading to more comprehensive and successful investigations.
- **Vigorous Pursuit of Adjudication:** The LJIR is dedicated to actively pursuing the thorough investigation and, when sufficient evidence is gathered and legally defensible, the vigorous adjudication of all wildfire-related crimes, including the serious offense of arson, through the appropriate and legally established Tribal, federal, and state legal channels. This commitment underscores the Tribe's resolve to hold individuals accountable for actions that endanger the community and its resources.
- **Respect for Tribal Sovereignty and Legal Frameworks:** All wildland fire investigations conducted within the La Jolla Indian Reservation will be carried out in a manner that unequivocally respects the inherent sovereignty of the La Jolla Band of Luiseño Indians and strictly adheres to all applicable Tribal laws, federal statutes, regulations, and established legal frameworks governing activities within Indian Country. This ensures that investigative actions are legally sound, culturally sensitive, and uphold the Tribe's self-governance.

7.2 AUTHORITY

The legal authority underpinning the conduct of wildland fire investigations, particularly those involving suspected arson, within the La Jolla Indian Reservation (LJIR) is firmly rooted in a comprehensive and interconnected framework of statutes, regulations, formal guidance documents, and established handbooks, as detailed below. This multi-layered approach ensures that investigative actions are legally sound, procedurally consistent, and respectful of Tribal sovereignty while adhering to federal law and best practices.

A. Statutes and Regulations: This section outlines the key legislative acts and codified rules that grant the legal basis for conducting these investigations and pursuing potential legal action.

- **18 U.S.C. § 1153, Offenses committed within Indian country (Indian Country Crimes Act):** This critical federal statute extends the criminal jurisdiction of the United States to encompass a specific list of major crimes, including arson under certain circumstances (depending on the severity and potential consequences), when committed within Indian Country. This jurisdiction applies regardless of whether the alleged perpetrator or the victim is an Indian, making it a significant legal tool for addressing serious arson incidents on the LJIR. Understanding the

specific criteria and potential limitations of federal jurisdiction under this statute is paramount for determining the appropriate legal avenues for prosecution.

- **18 U.S.C. § 1855, Timber set afire:** This narrowly focused federal statute specifically criminalizes the willful and malicious act of setting fire to any timber, underbrush, or grass located upon the public domain or, crucially in the context of the LJIR, upon any lands owned by the United States. Given the trust status of a significant portion of the land within the La Jolla Indian Reservation, this statute directly applies to individuals who intentionally ignite fires on these federally held lands, providing a clear basis for federal prosecution in such cases.
- **18 U.S.C. § 1856, Fires left unattended and unextinguished:** While not directly addressing the intentional act of arson, this federal statute criminalizes the act of negligently or carelessly leaving fires unattended and unextinguished on federal lands. This provision can become relevant in investigations where initial suspicions of arson are not substantiated, but evidence emerges indicating gross negligence or recklessness in the handling of fire that ultimately led to a wildland fire incident on trust or federal land within the LJIR.
- **18 U.S.C. § 5032, Delinquency proceedings in district courts; transfer for criminal prosecution:** This federal statute establishes the specific procedures for handling juvenile offenders (individuals under the age of eighteen) within the federal court system. In the event of an arson incident on the LJIR involving a minor, this statute dictates the process for potential delinquency proceedings or, depending on the age of the juvenile and the severity of the alleged offense, the possibility of transfer for criminal prosecution in federal district court.
- **25 U.S.C. § 3104, Management of Indian forest land:** This broad federal statute grants the Secretary of the Interior, acting through the Bureau of Indian Affairs (BIA), comprehensive authority for the management, protection, and preservation of Indian forest lands held in trust by the United States. This authority inherently includes the power to develop and implement fire management programs, conduct thorough investigations into incidents that threaten these valuable resources (including those caused by arson), and take all necessary actions to protect them from damage and loss.
- **25 CFR § 11.409, Reckless burning or exploding:** This specific regulation promulgated by the Bureau of Indian Affairs (BIA) directly prohibits the reckless burning or exploding of any substance on Indian lands. This provides a clear regulatory basis for addressing irresponsible and dangerous behavior involving fire that may not meet the strict legal definition of arson (intentional ignition) but still results in a wildfire or poses a significant threat to persons and property on the LJIR.
- **25 CFR § 11.410, Criminal mischief:** This Bureau of Indian Affairs (BIA) regulation addresses the willful destruction or damage of property located on Indian lands. Arson, by its very nature, involves the intentional damage of property, whether it be vegetation, timber, structures, or the land itself. This regulation provides a direct legal basis under BIA authority for addressing arson incidents on the La Jolla Indian Reservation.

- **25 CFR § 11.430, False alarms:** While not directly related to the act of arson itself, this Bureau of Indian Affairs (BIA) regulation addresses the making of false fire alarms on Indian lands. This regulation is relevant to maintaining the integrity of fire response systems and can be applicable in situations where false alarms are used to mask or facilitate arson activity.

- **25 CFR § 163.29, Trespass:** This Bureau of Indian Affairs (BIA) regulation addresses unauthorized entry onto and activities upon Indian lands. In certain arson investigations on the LJIR, the act of intentionally setting a fire may also involve the perpetrator trespassing on Tribal land or individually owned trust land without permission. This regulation can therefore be a relevant component of the overall investigation and potential charges.

B. Guidance: This section highlights key guidance documents that provide established methodologies and best practices for conducting wildland fire investigations.

- **Guide to Wildland Fire Origin and Cause Determination, National Wildfire Coordinating Group (NWCG) publication PMS 412:** This NWCG publication stands as the foundational technical reference for wildland fire investigators across all jurisdictions. It provides a comprehensive, systematic, and scientifically grounded methodology for accurately determining the origin and cause of wildfires, including detailed guidance on meticulous fire scene examination, the proper identification and collection of evidence, effective witness interviewing techniques, and the rigorous application of the scientific method throughout the investigative process. Adherence to the principles and procedures outlined in PMS 412 is absolutely crucial for ensuring the technical accuracy, legal defensibility, and overall credibility of arson investigations conducted on the LJIR.

- **National Incident Management System: Wildland Fire Qualification System Guide, NWCG publication 310-1:** This NWCG publication establishes the standardized qualification standards and training requirements for personnel involved in all aspects of wildland fire management, including the specialized role of wildland fire investigators. Ensuring that individuals conducting arson investigations on the LJIR meet these established professional standards is vital for maintaining the quality and effectiveness of the investigative process.

- **National Fire Protection Association (NFPA) 921 Guide for Fire and Explosion Investigations:** While its primary focus lies in structural fire investigations, this widely recognized NFPA guide offers fundamental principles, scientific methodologies, and best practices for fire and explosion investigations that can be highly valuable and readily applicable to certain aspects of wildland arson cases, particularly those involving potential incendiary devices or complex fire behavior patterns. LJIR and BIA investigators are encouraged to consider the relevant principles outlined in NFPA 921 to enhance their investigative techniques.

C. Handbooks: This section identifies specific handbooks that provide practical, agency-specific procedures and guidelines for wildland fire investigations.

- **53 IAM 7-H: Indian Forest Management Handbook - Forest Trespass:** This Bureau of Indian Affairs (BIA) handbook specifically addresses issues related to unauthorized activities and intrusions upon Indian forest lands. This resource can be particularly relevant in arson investigations where the act of intentionally setting the fire may have been preceded by or involved an act of trespassing onto Tribal or trust land.
- **90 IAM 6-H: Wildland Fire Origin and Cause Investigation Handbook:** This Bureau of Indian Affairs (BIA) handbook serves as a critical agency-specific supplement to the broader NWCG PMS 412 guide. It provides detailed procedures, specific considerations, and unique requirements pertinent to conducting wildland fire origin and cause investigations specifically on Indian lands. This handbook may address specific Tribal protocols, jurisdictional nuances, BIA reporting requirements, and other agency-specific guidelines, making it an indispensable resource for investigators working on the La Jolla Indian Reservation.
- **Interagency Standards for Fire & Aviation Operations (Red Book):** While its primary focus is on the operational aspects of wildland fire management, this comprehensive interagency handbook contains general policies, procedural frameworks, and guidelines relevant to overall incident management, interagency cooperation, and safety protocols during fire incidents. These broader guidelines can indirectly influence the coordination and conduct of arson investigations, particularly in situations involving multiple agencies or complex incident management structures.
- **Federal Bureau of Investigation (FBI) Handbook of Forensic Services:** This comprehensive handbook outlines the wide range of forensic services, technical capabilities, and expert resources offered by the Federal Bureau of Investigation (FBI). In complex or high-profile arson investigations on the LJIR, particularly those that may fall under federal jurisdiction or require specialized forensic analysis of evidence (such as accelerant detection or device analysis), the resources and expertise detailed in this handbook can be invaluable in supporting the investigative process and strengthening potential legal cases.

This comprehensive and interconnected framework of Tribal law, federal statutes and regulations, nationally recognized investigative guidance, and agency-specific handbooks ensures that investigations of suspected arson on the La Jolla Indian Reservation are conducted with clear legal authority, in strict adherence to established best practices and standardized procedures, and with due consideration for the unique legal and jurisdictional landscape of Indian Country. This robust foundation is essential for ensuring thorough, objective, and legally defensible investigations that contribute to the safety and well-being of the La Jolla Band of Luiseño Indians and the protection of their valuable resources.

7.3 OBJECTIVES

This Arson Investigation Plan is meticulously designed to provide comprehensive guidance and establish standardized protocols that will be rigorously followed by all personnel of the La Jolla Reservation Fire Department (LJRFD), the La Jolla Tribal Law Enforcement Agency, and the Bureau of Indian Affairs (BIA)

involved in the critical tasks of thoroughly investigating and effectively responding to all incidents of suspected arson that occur within the defined boundaries of the La Jolla Indian Reservation (LJIR). Recognizing the unique jurisdictional landscape and the importance of interagency collaboration, this Plan has been carefully developed in strict accordance with the established guidance provided in the BIA Wildland Fire Management Program Guide (often referred to as the "Red Book") and all other pertinent federal and Tribal laws, regulations, and policies. The overarching and primary objectives of this Arson Investigation Plan are multifaceted and aim to ensure a comprehensive and effective response to wildland arson incidents, specifically to:

- **Ensure the Safety of All Personnel:** The paramount objective of this Plan is to prioritize the safety and well-being of all personnel involved in every phase of the arson investigation process, from initial response and scene assessment to evidence collection and potential apprehension activities. This includes adhering to established safety protocols, providing appropriate personal protective equipment (PPE), and conducting thorough risk assessments to mitigate potential hazards at the fire scene and during investigative activities.
- **Thoroughly Investigate All Suspected Arson Incidents:** A core objective is to ensure that every wildland fire incident where arson is suspected is subjected to a comprehensive, systematic, and scientifically sound investigation. This includes meticulously determining the precise origin of the fire, accurately identifying the probable cause of ignition, and thoroughly documenting all relevant factors and findings. The goal is to move beyond mere suspicion to establish factual determinations based on evidence and expert analysis.
- **Identify and Apprehend Individuals Responsible for Arson:** A critical law enforcement objective of this Plan is to facilitate the identification and subsequent apprehension of any individual or individuals who are determined to be responsible for intentionally igniting wildland fires within the LJIR. This involves the skillful application of investigative techniques, the diligent pursuit of leads, and the collaborative efforts of fire investigators and law enforcement personnel to bring those responsible to justice.
- **Collect and Preserve All Evidence in a Legally Sound Manner:** To ensure the successful prosecution of arson cases, this Plan emphasizes the critical importance of properly identifying, collecting, preserving, and handling all physical and testimonial evidence in strict adherence to established legal protocols and evidentiary standards. This includes maintaining a meticulous chain of custody, utilizing appropriate forensic techniques, and ensuring the admissibility of evidence in Tribal, federal, or state court proceedings.
- **Establish Clear Lines of Communication and Ensure Effective Coordination Between All Involved Agencies:** Recognizing that wildland fire investigations often require the coordinated efforts of multiple agencies with distinct roles and responsibilities, this Plan aims to establish clear and efficient lines of communication and foster seamless collaboration between the LJIRFD, La Jolla Tribal Law Enforcement, the BIA Law Enforcement Services, and any other relevant Tribal, federal, state, or local agencies that may become involved in the investigation. This coordinated approach is essential for optimizing resource utilization, avoiding duplication of effort, and ensuring a unified and effective investigative response.
- **Implement Preventative Measures to Reduce the Likelihood of Future Arson Incidents:** Beyond the immediate response and investigation of arson incidents, this Plan also recognizes the importance of proactive measures aimed at reducing the future occurrence of such crimes. This objective involves analyzing patterns and trends in arson incidents, developing and implementing targeted public education campaigns, increasing community awareness, and potentially employing enhanced surveillance or patrol strategies in high-risk areas to deter potential offenders.

7.4 AUTHORITY AND JURISDICTION

The responsibility for investigating incidents of arson occurring within the exterior boundaries of the La Jolla Indian Reservation rests primarily with the La Jolla Tribal Law Enforcement Agency. This inherent Tribal authority is complemented by the support and collaborative efforts of the Bureau of Indian Affairs (BIA) Law Enforcement Services, particularly when incidents occur on federally held trust or restricted Indian lands, and the specialized expertise of the La Jolla Reservation Fire Department (LJRFD) in fire behavior, origin, and cause determination. This Plan explicitly acknowledges the distinct roles, specific responsibilities, and unique expertise that each of these agencies brings to the investigation process, while simultaneously emphasizing the critical need for seamless communication, mutual respect, and effective collaboration to ensure comprehensive and successful outcomes. The legal authority underpinning these investigations is derived from a robust framework encompassing Tribal law enacted by the La Jolla Band of Luiseño Indians, applicable federal statutes (including, but not limited to, the Indian Country Crimes Act and specific fire-related statutes), and relevant policies and regulations promulgated by the Bureau of Indian Affairs, as further outlined within the BIA Wildland Fire Management Program Guide (Red Book) and other pertinent directives.

7.5 INITIAL RESPONSE AND SCENE SECURITY

7.5.1 INITIAL FIRE SUPPRESSION

Upon arrival at the scene of a suspected arson incident, the immediate and primary focus of the La Jolla Reservation Fire Department (LJRFD) will be the safe and effective suppression of the fire. This paramount objective aims to minimize the extent of damage to natural resources, protect any threatened structures or infrastructure, and prevent the fire from spreading to adjacent areas, thereby ensuring the safety of the community and the responding personnel. Fire suppression activities will be conducted in accordance with established firefighting tactics and safety protocols.

7.5.2 SCENE SECURITY AND CONTROL

Once the wildland fire is brought under control and the incident scene is deemed safe for entry by the Incident Commander (IC) from the LJRFD, immediate and decisive steps will be taken to establish and maintain strict security around the potential fire origin area. This critical action is essential to protect any potential evidence from being inadvertently disturbed, damaged, or lost, thereby preserving the integrity of the investigation. Scene security and control measures will include, but are not limited to:

- **Establishing a Perimeter:** A clearly defined perimeter will be established around the suspected point of origin of the fire. The size and configuration of this perimeter will be determined by the IC based on factors such as the size of the fire, the terrain, and the potential location of evidence. Physical barriers, such as fire line tape or personnel, may be used to delineate the secured area.
- **Limiting Access:** Access to the secured fire scene will be strictly limited to essential personnel directly involved in the fire suppression, initial scene assessment, and subsequent investigation. This controlled access minimizes the risk of evidence contamination or disturbance by unauthorized individuals.

- **Documenting Entry and Exit:** A log will be meticulously maintained to record the names, affiliations, and times of all individuals entering and exiting the secured fire scene. This documentation helps to track who has been within the potential evidence area and can be crucial for maintaining the chain of custody of any recovered evidence.
- **Preserving the Scene:** All personnel operating within the secured fire scene will take utmost care to avoid any unnecessary disturbance of the ground, vegetation, or any other potential evidence. Pathways for essential movement will be carefully chosen, and any observations of potential evidence will be immediately communicated to the designated law enforcement or investigative personnel without touching or moving the items.

7.5.3 INITIAL OBSERVATIONS

All fire personnel responding to a suspected arson incident will be trained to remain vigilant and make careful initial observations upon arrival and during the initial suppression efforts. These observations, while primarily focused on fire behavior and safety, may also reveal potential indicators suggesting the possibility of intentional ignition. These initial observations will be promptly and accurately documented and relayed to La Jolla Tribal Law Enforcement as soon as possible. Potential indicators of arson that fire personnel will be trained to recognize and report include, but are not limited to:

- **Unusual Fire Behavior or Rapid Spread:** Fire behavior that is inconsistent with natural conditions, such as unusually rapid spread rates or unexpected changes in direction, may suggest the presence of accelerants or other intentional acts.
- **Multiple Points of Origin:** The presence of two or more distinct and separate areas where the fire appears to have started simultaneously or in close succession is a significant indicator of potential arson.
- **Presence of Incendiary Devices or Materials:** The discovery of any devices or materials that appear to have been intentionally used to start the fire, such as partially burned containers, timing devices, or unusual arrangements of fuel, will be immediately noted and reported.
- **Suspicious Odors:** The detection of unusual odors at the fire scene, such as the smell of gasoline, kerosene, or other volatile organic compounds, may indicate the use of accelerants.
- **Footprints or Tire Tracks in Unusual Locations:** The observation of footprints or tire tracks leading into or out of the fire origin area, particularly in locations where they would not normally be expected, may suggest the presence of a suspect.
- **Witness Statements Regarding Suspicious Activity:** Any spontaneous statements made by witnesses at the scene regarding suspicious persons, vehicles, or activities observed prior to or during the fire will be carefully documented and relayed to law enforcement.

7.6 NOTIFICATION AND COORDINATION

7.6.1 NOTIFICATION PROTOCOL

As soon as the Incident Commander (IC) or any other responding fire personnel develop a reasonable suspicion that a wildland fire may have been intentionally ignited (arson), a prompt and formal notification to La Jolla Tribal Law Enforcement is paramount. This immediate notification ensures the timely involvement of law enforcement personnel with the necessary investigative authority and expertise. The initial notification will include, at a minimum, the following critical information:

- **Location of the Incident:** The precise geographic location of the fire incident, including any relevant landmarks, addresses, or GPS coordinates if available.
- **Time of the Incident:** The date and time when the fire was first reported or discovered.
- **Brief Summary of the Situation and Reasons for Suspecting Arson:** A concise overview of the fire incident, including the current status (e.g., under control, contained), and a clear explanation of the specific observations or circumstances that have led to the suspicion of arson.
- **Contact Information for the IC on Scene:** The name and current contact information (e.g., radio call sign, cell phone number) of the Incident Commander who is managing the incident on the ground.
- **Any Initial Observations of Potential Evidence:** A summary of any initial observations made by fire personnel that may be relevant to the arson investigation, such as those outlined in Section 7.5.3.

7.6.2 INTERAGENCY COORDINATION

Recognizing that effective wildland arson investigations necessitate a collaborative and coordinated effort, this Plan emphasizes the crucial importance of seamless communication and ongoing coordination between all involved agencies, primarily the LJRFD, La Jolla Tribal Law Enforcement, and the BIA Law Enforcement Services (when their jurisdiction is applicable). To facilitate this essential interagency cooperation, the following protocols will be implemented:

1. **Designated Points of Contact:** Each primary agency (LJRFD, Tribal Law Enforcement, and BIA Law Enforcement if involved) will designate a primary point of contact for the arson investigation. These designated individuals will be responsible for facilitating communication and information sharing between their respective agencies.
2. **Regular Communication:** Consistent and regular communication will occur throughout the entire investigation process. This may include initial briefings at the scene, periodic updates via radio or telephone, and formal interagency meetings as deemed necessary by the lead investigative agency.
3. **Joint Scene Assessment and Walk-Through:** As soon as it is safe and feasible, a joint assessment and walk-through of the fire scene will be conducted by representatives from the LJRFD and Tribal Law Enforcement (and BIA Law Enforcement, if involved). This collaborative assessment allows for the sharing of initial observations, the identification of potential evidence, and the joint development of an initial investigative strategy.
4. **Sharing of Information, Evidence, and Witness Statements:** All relevant information, physical evidence collected, and witness statements obtained by any of the involved agencies will be promptly shared with the other participating agencies to ensure a comprehensive and unified understanding of the case.
5. **Collaborative Development of Investigation Strategies:** The lead investigative agency (typically Tribal Law Enforcement, potentially in collaboration with BIA Law Enforcement) will work collaboratively with the LJRFD and other involved agencies to develop and implement comprehensive investigation strategies, including the identification of investigative priorities, the assignment of specific tasks, and the coordination of resource deployment.
6. **Joint Interviews of Suspects and Witnesses (When Appropriate):** In certain circumstances, and when deemed appropriate by the lead investigative agency, joint interviews of potential

suspects and witnesses may be conducted by representatives from multiple agencies to leverage the diverse expertise and perspectives of the involved personnel.

7.7 EVIDENCE IDENTIFICATION, COLLECTION, AND PRESERVATION

This critical phase of the arson investigation, guided significantly by the comprehensive procedures and best practices outlined in the Bureau of Indian Affairs (BIA) Wildland Fire Management Program Guide (Red Book), focuses on the systematic identification, meticulous collection, and secure preservation of all physical and documentary evidence relevant to determining the origin and cause of the fire and potentially identifying those responsible. The integrity of the evidence is paramount to any subsequent legal proceedings.

7.7.1 EVIDENCE IDENTIFICATION

Trained fire investigators (from the LJRFD and/or the BIA, depending on jurisdictional responsibilities and available expertise) will work in close coordination with law enforcement personnel to systematically and methodically examine the fire scene. The Red Book provides detailed guidance on recognizing various indicators of arson, such as unusual burn patterns, the presence of potential ignition sources, and the detection of possible accelerants (refer to the specific chapters within the Red Book dedicated to fire origin and cause investigation). This collaborative effort will focus on identifying the following types of crucial evidence, but is not limited to:

1. **Point(s) of Origin:** The meticulous and accurate determination of the precise location or locations where the fire ignited is a foundational element of the investigation. Investigators will employ accepted fire investigation techniques, as detailed in the Red Book and NWCG PMS 412, to trace the fire spread back to its source. Documentation of burn patterns, charring, and other fire effects will be critical in establishing the origin area(s).
2. **Accelerants:** The potential use of flammable or combustible liquids (e.g., gasoline, kerosene, diesel fuel) as accelerants is a common factor in arson cases. Trained investigators will utilize their olfactory senses and visual observations to identify potential areas where accelerants may have been used. Sampling for the presence of these substances will be conducted using approved techniques and specialized collection kits designed to prevent contamination. The Red Book may provide specific protocols and guidelines for accelerant detection, the proper selection of sampling locations, and the appropriate collection methods.
3. **Ignition Devices:** A thorough search for any potential ignition sources will be conducted. This may include, but is not limited to, matches (both burned and unburned), lighters, timing devices (mechanical or electronic), improvised incendiary devices, and any other materials that could have been used to initiate the fire. The Red Book may offer guidance on recognizing and collecting these types of devices, emphasizing the need to handle them carefully to preserve potential fingerprints or DNA evidence.
4. **Physical Evidence:** The fire scene will be carefully examined for any physical evidence that may link a suspect to the crime. This can include the documentation and collection of footprints in soft soil or ash, tire tracks leading to or from the scene, tool marks on fences or other objects, fibers or hairs that may have been left behind, and any other trace evidence. The Red Book and standard forensic protocols will guide the proper identification and collection of such evidence to maintain its evidentiary value.

5. **Documents and Digital Evidence:** Investigators will be attentive to the presence of any written materials (e.g., notes, threats), electronic devices (e.g., cell phones, computers, cameras), or surveillance footage from nearby properties that may contain relevant information related to the fire or potential suspects. The proper seizure and forensic analysis of digital evidence will be conducted in accordance with legal protocols and best practices.

7.7.2 EVIDENCE COLLECTION AND PRESERVATION

To ensure the admissibility of all collected evidence in any potential legal proceedings, strict adherence to chain-of-custody protocols is mandatory. The Red Book, in conjunction with established law enforcement evidence handling procedures, outlines the proper methods for the collection, packaging, labeling, and transportation of various types of evidence encountered at a wildland fire scene. These procedures include:

1. **Using Appropriate Containers:** Different types of evidence require specific types of containers to prevent contamination and degradation. For example, accelerant samples must be collected and sealed in clean, airtight metal cans or specially designed glass containers to prevent evaporation of volatile compounds. Other items, such as clothing fibers or paper documents, may be packaged in clean paper bags or envelopes. The Red Book may specify the appropriate container types for different categories of evidence.
2. **Proper Labeling:** Each item of evidence collected must be clearly and accurately labeled with essential information. This labeling typically includes the date and time of collection, the precise location where the evidence was found, a detailed description of the item, the collector's initials or identification number, and a unique evidence identification number. The Red Book may provide specific guidelines for evidence labeling procedures.
3. **Maintaining a Detailed Chain-of-Custody Log:** A meticulous chain-of-custody log must be maintained for every piece of evidence from the moment it is collected until it is presented in court or properly disposed of. This log documents every transfer of evidence, including the date, time, the identity of the person relinquishing custody, and the identity of the person receiving custody. Each individual who handles the evidence must sign and date the log, ensuring an unbroken record of possession.
4. **Storing Evidence Securely:** All collected evidence must be stored in secure locations with controlled access to prevent tampering, loss, or degradation. Different types of evidence may require specific storage conditions (e.g., refrigerated storage for biological samples). The BIA may have designated evidence storage facilities and specific protocols for maintaining the security and integrity of evidence.

7.7.3 PHOTOGRAPHY AND DOCUMENTATION

Comprehensive and detailed photographic and written documentation of the fire scene and all identified evidence is crucial for accurately recording the conditions at the time of the investigation and providing a visual record for future reference, including potential court proceedings. This documentation will include:

- **Overall Views of the Scene and Surrounding Area:** Wide-angle photographs and video footage will be taken to capture the general layout of the fire scene, the surrounding terrain, vegetation,

and any structures in the vicinity. These overall views provide context for the specific locations where evidence was found.

- **Close-Up Photographs of the Point(s) of Origin and Any Evidence:** Detailed close-up photographs and video recordings will be taken of the determined point(s) of origin, as well as each individual piece of evidence before it is collected and after it has been properly marked or tagged for identification. These close-up images should include scale markers to indicate the size of the evidence.
- **Diagrams and Sketches of the Scene:** Investigators will prepare accurate diagrams and sketches of the fire scene, indicating the point(s) of origin, the location of significant evidence items, and the spatial relationships between different elements of the scene. These diagrams provide a clear visual representation of the scene layout.
- **Comprehensive Written Reports:** Detailed written reports will be prepared by the investigating personnel, meticulously documenting all observations made at the fire scene, the specific locations where evidence was found, the methods used for collection and preservation, the chain of custody, and any other pertinent information related to the evidence. These reports serve as a comprehensive written record of the investigation.

7.8 WITNESS INTERVIEWS AND SUSPECT APPREHENSION

7.8.1 WITNESS INTERVIEWS

Law enforcement personnel, possessing specialized training in interview techniques, will conduct thorough and systematic interviews of any individuals who may possess information relevant to the fire incident or any suspicious activity observed in the area prior to, during, or after the fire. These witnesses may include individuals who reported the fire, nearby residents, hikers, or anyone else who may have knowledge pertinent to the investigation. All interviews will be carefully documented, and formal written or recorded statements will be taken from witnesses to preserve their accounts.

7.8.2 SUSPECT IDENTIFICATION AND APPREHENSION

Based on the totality of the evidence gathered, including physical evidence, witness statements, and any other investigative leads, law enforcement personnel will work diligently to identify potential suspects who may be responsible for the arson. Once a suspect has been identified and sufficient probable cause exists, apprehension will be conducted in strict accordance with established legal procedures, ensuring the suspect's constitutional rights are protected. Coordination with BIA Law Enforcement Services will be essential if federal charges are anticipated, ensuring a unified and legally sound approach to the apprehension process.

7.9 INVESTIGATION FOLLOW-UP AND REPORTING

7.9.1 CASE FILE MANAGEMENT

A comprehensive and well-organized case file will be meticulously maintained by the lead investigating agency (typically La Jolla Tribal Law Enforcement). This file will serve as the central repository for all documentation generated during the investigation, including all incident reports, detailed fire

investigation reports, photographic and video documentation, evidence documentation and chain-of-custody records, witness statements, interview transcripts, and any other relevant information gathered. Proper case file management ensures the integrity and accessibility of all investigative materials.

7.9.2 REPORTING PROCEDURES

Detailed and comprehensive investigation reports will be prepared by the lead investigating agency (typically Tribal Law Enforcement) upon the conclusion of the active investigation phase. These reports will thoroughly summarize the findings of the investigation, including the determined origin and cause of the fire, the evidence collected, the witness interviews conducted, and any identified suspects. These reports will be formally shared with all agencies involved, including the LJRF and the BIA. Specific reporting requirements may be further outlined in the Red Book or in formal agreements established between the La Jolla Band of Luiseño Indians and the Bureau of Indian Affairs.

7.10 PREVENTION AND EDUCATION

Following the conclusion of an arson investigation, the La Jolla Reservation Fire Department (LJRF) and Tribal authorities will conduct a thorough review of the circumstances surrounding the incident to identify potential preventative measures that can be implemented to reduce the likelihood of future arson incidents within the Reservation. These preventative measures may include, but are not limited to:

- **Increased Patrols and Law Enforcement Presence:** Implementing increased patrols by law enforcement and fire personnel in areas identified as being at higher risk for arson activity.
- **Public Awareness Campaigns:** Developing and implementing public education campaigns aimed at raising awareness about the dangers, costs, and legal consequences of arson, targeting both the general community and specific at-risk groups.
- **Community Involvement Programs:** Encouraging community members to actively participate in fire prevention efforts by reporting any suspicious activities or concerns to the appropriate authorities.
- **Targeted Education Programs for Youth:** Implementing educational programs specifically designed for youth to teach them about fire safety, the destructive nature of arson, and the potential legal ramifications of such actions.

7.11 TRAINING AND QUALIFICATIONS

To ensure the effectiveness and professionalism of arson investigations on the La Jolla Indian Reservation, all LJRF personnel, Tribal Law Enforcement officers, and tribal personnel will receive comprehensive and appropriate training in relevant areas to assist fire investigators. This training will encompass fire investigation techniques, proper evidence identification, collection, and preservation methods, applicable legal procedures and requirements, and the principles of effective interagency coordination. The training provided will be consistent with nationally recognized standards and any specific guidance or requirements outlined by the Bureau of Indian Affairs.

7.12 PLAN REVIEW AND UPDATES

This Arson Investigation Plan is intended to be a living document that remains current and relevant. To ensure its continued effectiveness, the Plan will be subject to periodic review and updates, occurring at least on an annual basis or more frequently as needed in response to lessons learned from actual incidents, changes in applicable laws or regulations, or significant incidents that highlight areas for improvement. The review process will involve input and participation from representatives of all participating agencies (LJRF, Tribal Law Enforcement, and the BIA).

8.0 BURN PERMITS

In alignment with the goals of this Wildland Fire Management Plan (WFMP), the La Jolla Band of Luiseño Indians has established a formal Burn Permit System to regulate all open burning. The system's purpose is to ensure any intentional fire is conducted safely and responsibly, protecting life, property, and the Reservation's invaluable resources from escaped fires. 🔥

By requiring permits, the La Jolla Reservation Fire Department (LJRF) can assess risk, educate residents on safe practices, monitor conditions, and support traditional cultural burning.

All open burning on the La Jolla Indian Reservation is prohibited unless conducted under a valid, approved burn permit issued by the LJRF or as otherwise specified in this chapter.

8.1 TYPES OF BURNING AND ASSOCIATED PERMITS

To meet diverse community needs, the LJRF oversees several types of burning, each with specific conditions.

8.1.1 RESIDENTIAL DEBRIS BURNING PERMIT

This permit (see Appendix D) is for residents to burn dry, natural vegetative material (such as leaves and small branches) and small quantities of paper documents originating from their property. Burning must be conducted in either an open pile or an approved burn barrel.

- **A. Open Pile Burning**

- o **Pile Size:** Maximum of four (4) feet in diameter and four (4) feet in height.

- o **Clearance:** A minimum ten (10) foot perimeter cleared to bare mineral soil is required around the pile.

- **B. Burn Barrel Use**

- o **Barrel Specifications:** Barrels must be made of metal and in good condition (no rust-through holes). The top opening must be covered at all times during use with a heavy-

4219 duty metal screen with openings no larger than one-half (1/2) inch to act as a spark
4220 arrester.

4221 o **Clearance:** A minimum ten (10) foot perimeter must be cleared to bare mineral soil
4222 around the barrel.

4223 o **Placement:** The barrel must be placed on a stable, non-combustible surface (such as
4224 bare ground or a concrete block).

4225 **Prohibited Materials (Applies to both methods):** The burning of household garbage, plastics, tires,
4226 treated or painted wood, glossy magazines, or construction materials is strictly forbidden.

4227 8.1.2 CULTURAL LAND MANAGEMENT BURNS

4228 This process supports traditional practices such as managing cultural gathering areas. To remove
4229 barriers to these essential activities, individual applicants are not required to obtain a formal permit.
4230 Instead, they must coordinate directly with the LJRFD.

4231 • **Collaboration:** The LJRFD will work with the applicant and the Tribal Historic Preservation Office
4232 (THPO) to develop a burn plan that meets cultural objectives while ensuring community safety.

4233 • **Flexibility:** Conditions regarding timing, size, and location will be determined on a case-by-case
4234 basis.

4235 • **Support:** The LJRFD will complete all necessary plans and approvals and provide personnel and
4236 equipment to support these vital activities.

4237 8.1.3 CEREMONIAL FIRES

4238 This category covers fires integral to specific Tribal ceremonies. The La Jolla Reservation Fire Department
4239 and Tribal Staff will handle all requests for ceremonial fires with the **utmost respect** and cultural
4240 sensitivity. These events will be facilitated **without pride or prejudice** in order to **honor all Tribal**
4241 **member families** and their traditions. The **Tribal Council** is available to assist in the coordination to
4242 ensure the process is smooth and respectful for the family involved.

4243 To remove barriers to these cultural practices, individual applicants are not required to obtain a permit.
4244 However, the event must be coordinated with the LJRFD a few days in advance. The Fire Department
4245 retains full responsibility for ensuring the ceremony is conducted safely and that all legal obligations are
4246 met by:

- 4247 • Developing a formal operational plan that respects ceremonial needs.
- 4248 • Securing all necessary permits (e.g., from air quality districts) on behalf of the Tribe.
- 4249 • Conducting all required notifications to agencies and the community.
- 4250 • Assigning personnel and equipment to ensure the event is managed safely.

4251 While we recognize that enforcing Red Flag day restrictions and conducting mandatory brush
4252 inspections can be an unfortunate inconvenience, they are absolutely essential measures we must take

4253 to ensure our ceremonies can proceed without interruption from outside fire agencies and to safeguard
4254 the entire community.

4255 **8.1.4 AGRICULTURAL AND LAND MANAGEMENT PERMIT**

4256 This permit is for larger-scale burning for agriculture or other land management goals. Due to the
4257 increased complexity, a detailed **Burn Plan Application** must be submitted and approved.

4258 **Burn Plan Application Requirements**

4259 The applicant must provide the following information for review:

4260 **1. Project Information & Goals**

- 4261 o Applicant Name, Address, and Contact Information.
- 4262 o Burn Location: Assessor's Parcel Number (APN), address, and a map of the burn unit.
- 4263 o Project Objective: A clear statement of purpose (e.g., "Clear 3 acres of a fallow field for
4264 planting").

4265 **2. Site Description**

- 4266 o Size of Burn Unit (in acres).
- 4267 o Fuel Type: Description of vegetation to be burned (e.g., "Dry seasonal grasses," "Piled
4268 chaparral").
- 4269 o Topography: General slope and aspect.
- 4270 o Sensitive Areas: Identify nearby homes, infrastructure, power lines, or cultural sites.

4271 **3. Required Pre-Burn Preparations**

- 4272 o Control Lines: Description of the firebreak (e.g., "A 15-foot wide firebreak will be disked
4273 around the entire unit").
- 4274 o Notifications: Confirmation that adjacent landowners will be notified at least 24 hours
4275 prior.

4276 **4. Acceptable Weather Conditions (Prescription)**

4277 The burn may only proceed if weather is within these ranges:

- 4278 o **Wind:** 2 to 10 MPH.
- 4279 o **Relative Humidity:** 25% or higher.
- 4280 o **Temperature:** Below 85°F.

(The permittee is responsible for checking the forecast and measuring on-site weather.)

5. On-Site Resources (Personnel & Equipment)

- o **Personnel:** Minimum number of people (e.g., "3 capable adults").
- o **Water Supply:** Method of water delivery (e.g., "One 500-gallon water tender").
- o **Tools:** Hand tools available (e.g., "4 shovels, 2 rakes").

6. Contingency Plan

Immediate actions if the fire escapes control lines:

- o "Immediately call 911 and the La Jolla Fire Department."
- o "Begin suppression of spot fires using on-site resources."

8.1.5 CAMPFIRES

This section covers rules for recreational or cooking fires.

A. Campfires in Designated Campgrounds (e.g., La Jolla Indian Campground) A permit is **not required** for campfires located within designated Tribal campground areas. However, all campers are fully responsible for maintaining a safe fire and must follow all posted rules and the mandatory conditions listed in section B below.

Management Protocol: Ensuring Fires Are Extinguished

Campground management is responsible for implementing and enforcing a strict policy to ensure all visitors completely extinguish their campfires. Management must educate every visitor on the required "dead out" standard, which means the fire is cold to the touch before a campsite is left unattended or for the night.

Management will enforce this policy through the following actions:

- **Provide Clear Instructions:** At check-in and through prominent signage, management must provide all visitors with the mandatory procedure for extinguishing a fire.
- **Enforce the Official Method:** The "drown, stir, and feel" method is the required standard. Management must ensure all campers understand these steps:
 1. **Drown:** Instruct visitors to pour plenty of water over the entire fire, not just a sprinkle. They should continue adding water until all hissing sounds stop.
 2. **Stir:** Require visitors to use a shovel to thoroughly mix the ashes and embers, ensuring any buried coals are exposed and saturated with water.

3. **Feel:** Emphasize that visitors must carefully place the back of their hand near the fire area without touching to feel for any remaining heat. The rule to be communicated is: "If it's too hot to touch, it's too hot to leave." 🔥 💧

- **Conduct Compliance Checks:** Staff should perform periodic checks of campsites, especially after check-out times, to ensure fires have been completely extinguished and to address any violations.

B. Campfires Outside of Designated Campgrounds

A valid Campfire Permit issued by the LJRFD is required for all campfires on the Reservation that are not in a designated campground.

- **Location:** Campfires must be in an approved fire pit or ring. Creating a new pit requires prior LJRFD inspection and approval.
- **Clearance:** A minimum of 10 feet in all directions must be cleared to bare soil. Ensure no flammable materials or overhanging branches are within 15 feet.
- **Size:** The fire shall not exceed three (3) feet in diameter.
- **Fuel:** Only clean, dry firewood may be burned. Burning trash or treated wood is prohibited.
- **Restrictions:** Campfires are prohibited during periods of high fire danger or Red Flag Warnings, even with a permit.
- **Extinguishing:** Before leaving, the fire must be **dead out**. Use the "drown, stir, and feel" method:
 1. **Drown** the fire with plenty of water until the hissing stops.
 2. **Stir** the ashes and embers with a shovel to expose and wet any buried coals.
 3. **Feel** the area with the back of your hand to ensure it is cold. **If it's too hot to touch, it's too hot to leave.** 🔥 💧

8.2 BURN PERMIT APPLICATION AND ISSUANCE PROCESS

Follow these steps to obtain and use a burn permit on the Reservation.

1. Submit an Application

Obtain and complete the appropriate Burn Permit Application from the LJRFD.

- o **Agricultural & Land Management Permits:** Require a detailed Burn Plan.
- o **Residential & Campfire Permits:** Require the standard permit application.

- o **Cultural & Ceremonial Burns:** This step is replaced by direct coordination with the Fire Chief, who will handle the planning and approval process.

2. Site Inspection

After your application is submitted, an authorized LJRFD member will conduct a mandatory site inspection to verify your proposed burn location meets all safety requirements.

3. Permit Issuance

Following a successful inspection, the LJRFD will issue a signed permit, typically valid for the calendar year. The original permit must be kept on-site during burning.

4. Obtain Daily Ignition Approval

This is a critical step. Possessing a permit does not grant permission to burn at any time. On the day you wish to burn, you must call the LJRFD to confirm it is a permissive burn day and receive final verbal approval for ignition.

5. Annual Renewal

Permits expire at the end of each calendar year and must be renewed annually with a new application and site inspection.

8.3 GENERAL BURN PERMIT CONDITIONS

All permittees must adhere to the following rules:

- **Check Before You Burn:** You must call the LJRFD on the day of the burn to confirm it is a permissive burn day and receive ignition approval.
- **Supervision:** A responsible adult (18+) must attend the fire at all times until it is completely extinguished (dead out).
- **Water Source:** A charged water hose or a minimum 5-gallon water supply and a shovel must be at the burn site.
- **Daylight Hours:** All open burning must be conducted during daylight hours. Fires must be fully extinguished before nightfall. *(This condition does not apply to approved campfires or ceremonial fires.)*
- **Liability:** The permittee is legally and financially responsible for any damages and suppression costs from an escaped fire.

8.4 VIOLATIONS AND ENFORCEMENT

Failure to comply with these rules is a violation of Tribal law.

- 4368 • **Penalties:** Violations may result in fines, community service, and liability for all suppression
4369 costs.
- 4370 • **Permit Revocation:** Any violation will result in the immediate revocation of the burn permit and
4371 may lead to ineligibility for future permits.
- 4372

APPENDIX A: ACRONYMS AND GLOSSARY

List of Acronyms

- 4374
- 4375
- 4376 • **AOP** - Annual Operating Plan
- 4377 • **BAER** - Burned Area Emergency Response
- 4378 • **BAR** - Burned Area Rehabilitation (Non-emergency)
- 4379 • **BIA** - Bureau of Indian Affairs
- 4380 • **BIA-NIFC** - BIA National Branch of Fire and Aviation, National Interagency Fire Center
- 4381 • **CAL FIRE** - California Department of Forestry and Fire Protection
- 4382 • **CFMA** - California Master Cooperative Fire Protection Agreement and Stafford Response Act
- 4383 • **CWPP** - Community Wildfire Protection Plan
- 4384 • **DM** - U.S. Dept. of Interior Departmental Manual
- 4385 • **DOI** - Department of Interior
- 4386 • **EA** - Environmental Assessment
- 4387 • **ES** - Emergency Stabilization
- 4388 • **FD** - Fire Department
- 4389 • **Red Book** - Wildland Fire and Aviation Program Management and Operations Guide (issued by
4390 BIA-NIFC and updated annually)
- 4391 • **FMU** - Fire Management Unit
- 4392 • **FPU** - Fire Planning Unit
- 4393 • **GPS** - Global Positioning System
- 4394 • **IRPG** - Incident Response Pocket Guide, PMS 461, NFES 1077
- 4395 • **IAM** - Indian Affairs Manual
- 4396 • **IC** - Incident Commander
- 4397 • **IMET** - Incident Meteorologist
- 4398 • **IMT** - Incident Management Team
- 4399 • **Indian Country** - legal term used to designate reservations, informal reservations, dependent
4400 Indian communities, allotments, and unique lands held in trust by a Tribe or Tribal member.
- 4401 • **IRMP** - Integrated Resource Management Plan
- 4402 • **LJIR** - La Jolla Indian Reservation
- 4403 • **MAC** - Multi-Agency Coordinating Group
- 4404 • **MIST** - Minimum Impact Suppression Tactics
- 4405 • **NEPA** - National Environmental Policy Act

- 4406 • **NFDRS** - National Fire Danger Rating System
- 4407 • **NIFC** - National Interagency Fire Center
- 4408 • **NWCG** - National Wildfire Coordinating Group
- 4409 • **Prescribed Fire** - Any planned ignition intended to meet specific objectives
- 4410 • **RAWS** - Remote Automatic Weather Station
- 4411 • **RFMO** - BIA Regional Fire Management Officer
- 4412 • **SCA** - Southern California Agency
- 4413 • **SDGE** - San Diego Gas and Electric
- 4414 • **SDICC** - San Diego Interagency Communications Center
- 4415 • **USFS** - United States Forest Service
- 4416 • **Wildland Fire** - A general term describing any non-structure fire that occurs in the wildland.
- 4417 Wildland fires are categorized into two distinct types: unplanned ignitions or prescribed fires
- 4418 that are declared wildfires, and Prescribed Fires - planned ignitions.
- 4419 • **WFDSS** - Wildland Fire Decision Support System
- 4420 • **WFMP** - Wildland Fire Management Plan
- 4421 • **WUI** - Wildland Urban Interface Appendix B: References Cited
- 4422

APPENDIX B: POLICY FRAMEWORK FOR WILDLAND FIRE MANAGEMENT PLAN

This appendix outlines the key federal, Department of the Interior (DOI), and Bureau of Indian Affairs (BIA) policies, as well as relevant interagency guidance, that provide the foundational principles, strategic direction, and regulatory context for the La Jolla Indian Reservation's Wildland Fire Management Plan (WFMP). This plan must align with these directives to ensure legal soundness, consistency with national and departmental priorities, effective interagency collaboration, and appropriate strategies for wildland fire management.

I. Federal Wildland Fire Management Policy and Guidance:

The following documents establish the overarching principles and strategic direction for federal wildland fire management, which the WFMP must reflect.

- **Review and Update of the 1995 Federal Wildland Fire Management Policy (January 2001):** This foundational document outlines the core tenets of federal wildland fire management, including managing fire's role in ecosystems while protecting values at risk. The WFMP should incorporate these fundamental principles.
- **Guidance for Implementation of Federal Wildland Fire Management Policy (February 2009):** This updated guidance supersedes the "Interagency Strategy for the Implementation of Federal Wildland Fire Management Policy" (June 20, 2003) and provides specific instructions for translating federal policy into actionable strategies. It addresses key principles like firefighter and public safety, resource protection, and cost-effectiveness, all of which should inform the WFMP.
- **Modification of Federal Wildland Fire Policy Guidance (memorandum dated May 2, 2008):** This memorandum clarifies or adjusts existing federal fire policy on specific issues. The WFMP needs to incorporate any such modifications to ensure compliance with the latest federal directives, potentially impacting operational procedures or interagency coordination.
- **National Wildfire Coordinating Group Terminology Update, Attachment A, #24-2010 (April 30, 2010):** This document ensures consistent language and definitions are used in wildland fire management. The WFMP should adopt these updated terms to promote effective communication and interoperability with interagency partners.
- **Federal Register Volume 66, U.S. Department of Agriculture & U.S. Department of the Interior. 2001. Urban Wildland Interface Communities Within the Vicinity of Federal Lands That Are at Risk from Wildfires:** This notice addresses risks to Wildland-Urban Interface (WUI) communities near federal lands. The WFMP should acknowledge and address these specific risks, potentially informing strategies for fuel management and community outreach within the Reservation's WUI areas.
- **Healthy Forests Restoration Act of 2003 (HFRA):** This Act provides a framework for reducing hazardous fuels on federal lands and adjacent communities. The WFMP can leverage HFRA principles and authorities to support fuel reduction projects on the Reservation, especially in WUI areas and collaborative efforts.

Key Themes from Federal Policy:

- **Ecological Role of Fire:** Recognizing fire as a natural and essential ecological process.
- **Safety First:** Prioritizing firefighters and public safety in all operations.

- **Resource Protection:** Managing fire to protect values at risk while considering resource benefits.
- **Sound Risk Management:** Understanding, analyzing, and managing risks associated with fire management.
- **Economic Viability:** Emphasizing cost-effectiveness and efficiency.
- **Interagency Collaboration:** Fostering strong partnerships among federal, Tribal, state, and local agencies.
- **Standardization:** Promoting the use of common standards and procedures.
- **Science-Based Decision Making:** Utilizing the best available science to inform management decisions.
- **Landscape-Scale Planning:** Developing and implementing fire management plans at a broader ecological level.
- **Adaptive Management:** Recognizing the dynamic nature of fire and adjusting management responses accordingly.
- **Prioritizing Human-Caused Fires:** Giving priority to the suppression of human-caused ignitions.
- **Decision Support Processes:** Utilizing tools and documentation for informed decision-making.

II. Department of the Interior (DOI) Policy:

The DOI's Wildland Fire Management policy, primarily outlined in the following document, provides specific directives for fire management within the Department, including the BIA.

- **Department of Interior Departmental Manual Part 620, Chapter 1: Wildland Fire Management (April 9, 1998):** This chapter provides the core policies and procedures for wildland fire management within the DOI. The WFMP must directly align with the directives in this manual regarding all aspects of fire management.
- **The Department of the Interior (DOI) Departmental Manual 620 DM, Chapter 3, Burned Area Emergency Stabilization and Rehabilitation:** This chapter focuses on post-fire management. The WFMP should incorporate these policies to ensure a compliant and effective approach to addressing wildfire impacts on the Reservation.

Key Themes from DOI Policy:

- **Safety First:** Reinforcing the paramount importance of safety.
- **Ecosystem Sustainability:** Considering ecological, economic, and social dimensions.
- **Role of Fire:** Integrating fire into land management planning where appropriate.
- **Prioritizing Human Life:** Making it the overriding suppression priority.
- **Wildland-Urban Interface:** Acknowledging and addressing unique challenges through interagency cooperation.
- **Science-Based Approach:** Emphasizing the use of sound science.
- **Preparedness:** Prioritizing adequate staffing, training, and equipment.
- **Cost-Effectiveness:** Stressing efficient fire management programs.
- **Prevention:** Focusing on preventing unauthorized ignitions.
- **Interagency Cooperation:** Emphasizing strong collaboration.

III. Bureau of Indian Affairs (BIA) Policy and Handbooks:

These documents provide the foundational framework and specific direction for developing and implementing the WFMP on BIA-administered lands.

- **Indian Affairs Manual (IAM), Part 90 IAM, Wildland Fire Management, Jan. 2006:** This part of the IAM lays out the BIA's overall policies and responsibilities for wildland fire management on Indian lands. The WFMP must adhere to these overarching principles, covering suppression, preparedness, incident management, and post-fire rehabilitation.
- **Bureau of Indians Affairs (BIA), Fuel Management Program, 2008 Business Rules Handbook (July 2008):** This handbook provides specific business rules for managing fuel reduction projects on BIA lands. It can guide the WFMP in outlining efficient and compliant processes for planning and implementing fuel treatments.
- **Bureau of Indian Affairs (BIA), Fuel management Program – Supplement to the Interagency Prescribed Fire Planning and Implementation Procedures Reference Guide (December 2008):** This supplement provides BIA-specific guidance that complements broader interagency standards for prescribed fire, crucial for the WFMP's sections on planned fuels treatments.
- **Indian Affairs Manual (IAM), Part 57 IAM, Aviation Management, Oct. 1999:** This section addresses the management of aviation resources in fire management. If the WFMP includes aircraft use, this guidance is essential for safe and compliant procedures.
- **U.S. Code of Federal Regulations. April 1, 1999, Title 25, Indians. Chapter I, BIA, DOI. Part 163 – General Forestry Regulations. Sections 163.28 (a), (b), (c), (d):** These sections outline BIA regulations concerning forest management, directly related to fuel management and wildfire risk. The WFMP must be consistent with these legal requirements.
- **BIA, Wildland Fire & Aviation Operations Guide, "Red Book," [Insert Current Year] (issued annually):** This annually updated guide details operational procedures, safety protocols, and interagency coordination standards for BIA wildland fire and aviation operations. The WFMP should explicitly reference and incorporate the most current version.

Key Themes from BIA Policy:

- **BIA Mission:** Protecting lives, property, and resources while maintaining healthy ecosystems.
- **Authorities and Responsibilities:** Clearly defined for managing wildland fire on Indian lands.
- **Specific Guidance for Fuel Management and Prescribed Fire:** Providing detailed procedures for planning and implementation.
- **Safe Aviation Operations:** Ensuring compliant and safe use of aircraft.
- **Compliance with Forestry Regulations:** Adhering to federal regulations concerning forest management.
- **Operational Standards and Safety:** Utilizing the "Red Book" for current best practices.

IV. Interagency Fire Management Handbooks and Guides:

These handbooks and guides provide standardized procedures and best practices for various aspects of wildland fire management and should be referenced and incorporated into the WFMP where applicable. Ensure the most current versions are utilized.

- Wildland Fire Incident Management Field Guide (PMS 210)
- Incident Response Pocket Guide (IRPG) (PMS 461, NFES 1077)
- Interagency Prescribed Fire, Planning and Implementation Procedures Guide
- Interagency Burned Area Emergency Response Guidebook

- 4545 • Interagency Burned Area Rehabilitation Guidebook
- 4546 • Interagency Fire Regime Condition Class Guidebook
- 4547 • Interagency Standards for Fire and Fire Aviation Operations ([Current Year])
- 4548 • National Interagency Mobilization Guide ([Current Year])
- 4549 • **[If Applicable:]** Rocky Mountain Area Mobilization Guide ([Current Year]) **OR** Relevant
- 4550 Geographic Area Mobilization Guide
- 4551 • Fire Program Analysis (FPA) Guidance
- 4552 • Wildland Fire Qualification System Guide (PMS 310-1, NFES 1414)
- 4553 • FFI (FEAT/FIREMON Integrated) (Consider adding version/date)

4554 **V. State of California Policy:**

4555 While California laws (e.g., SB 310) regarding cultural and prescribed burning off trust lands do not
 4556 directly govern the Reservation, they offer opportunities for collaboration with neighboring agencies
 4557 (USFS, CALTRANS, etc.) and private landowners to enhance landscape-scale fire resilience and prevent
 4558 fire trespass. The WFMP should explore and outline potential collaborative efforts.

4559 **VI. Additional Guidance to Consider:**

- 4560 • **National Cohesive Wildland Fire Management Strategy:** This overarching strategy provides a
 4561 framework for wildland fire management across all jurisdictions and should inform the WFMP's
 4562 strategic direction.
- 4563 • **Relevant Tribal Policies and Regulations:** Any specific fire management policies or regulations
 4564 enacted by the La Jolla Band of Luiseño Indians must be explicitly included and integrated into
 4565 the WFMP.
- 4566 • **Interagency Agreements Specific to the Region:** List any specific agreements with neighboring
 4567 agencies that dictate operational procedures or resource sharing.
- 4568 • **Climate Change Considerations:** Integrate relevant climate change reports and projections
 4569 related to fire risk in the region into the WFMP's analysis and planning.

4570 By referencing and incorporating the guidance from these federal, DOI, BIA, and interagency policy
 4571 documents, as well as considering state and tribal contexts, the La Jolla Indian Reservation's WFMP will
 4572 be a more robust, legally sound, and effective plan for managing wildland fire. The WFMP should
 4573 explicitly cite these documents where relevant within its various sections.

4574

4575 **APPENDIX C: NEPA COMPLIANCE**

4576 This appendix details the National Environmental Policy Act (NEPA) compliance framework relevant to
 4577 the La Jolla Indian Reservation (LJIR) Wildland Fire Management Plan (WFMP) and associated projects.
 4578 NEPA, a cornerstone of environmental law in the United States, mandates that federal agencies assess
 4579 the environmental impacts of their proposed actions and involve the public in the decision-making
 4580 process. For the LJIR WFMP, which involves actions on federal trust land and often utilizes federal
 4581 funding or requires federal permits through the Bureau of Indian Affairs (BIA), adherence to NEPA is
 4582 crucial.

I. WFMP Level NEPA Compliance:

The WFMP itself has undergone a comprehensive Environmental Assessment (EA). This EA analyzed the potential environmental consequences of implementing the strategic framework and programmatic actions outlined in the WFMP. The EA concluded that the implementation of the WFMP would not result in significant impacts on the human or natural environment. This finding was formally documented in a Finding of No Significant Impact (FONSI), which has been made available for public review, fulfilling NEPA's transparency requirements. The Tribal Council's formal approval of the WFMP through a signed resolution not only signifies the Tribe's commitment to environmental stewardship but also acknowledges their concurrence with the NEPA process undertaken for the plan, aligning with the BIA's trust responsibility to protect tribal resources and interests.

II. Project-Level NEPA Compliance:

While the WFMP has undergone programmatic NEPA review, specific projects undertaken to implement the plan will, in many cases, require additional, project-level NEPA compliance. This is particularly true for individual actions that involve federal funding, require federal permits (e.g., from the BIA or other federal agencies), or have the potential for site-specific environmental impacts. Examples of such projects include, but are not limited to:

- **Prescribed Burns:** Planning and implementation of prescribed fire activities.
- **Mechanical Fuel Treatments:** Installation of fuel breaks, thinning projects, and mastication efforts.
- **Construction Activities:** Building fire management facilities or infrastructure.
- **Use of Herbicides:** Application of chemical treatments for vegetation management.
- **Road Construction or Modification:** Activities that could impact sensitive habitats or cultural resources.

The level of NEPA review required for a specific project (e.g., Categorical Exclusion, Environmental Assessment, or Environmental Impact Statement) will depend on the scope and potential environmental impacts of that particular action. The BIA, as the lead federal agency for actions on tribal trust lands, will typically be responsible for ensuring project-level NEPA compliance is conducted appropriately, often in consultation with the Tribe.

III. Key Environmental Laws and Considerations for Project-Level NEPA:

During the project-level NEPA process, several key environmental laws and considerations must be addressed to ensure compliance and minimize potential impacts:

- **Endangered Species Act (ESA) Section 7(a)(2):** This section mandates that federal agencies consult with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS) to ensure that any action they authorize, fund, or carry out is not likely to jeopardize the continued existence of a federally listed threatened or endangered species or result in the destruction or adverse modification of their designated critical habitat. Project-level NEPA documents must identify any listed species, or critical habitats present in the project area and detail the consultation process, and any mitigation measures required to avoid or minimize impacts.

- **National Historic Preservation Act (NHPA) Section 106:** This section requires federal agencies to take into account the effects of their undertakings on historic properties (sites, buildings, structures, or objects listed in or eligible for listing in the National Register of Historic Places) and to consult with the State Historic Preservation Officer (SHPO) and Tribal Historic Preservation Officer (THPO), if designated by the Tribe. Project-level NEPA analysis must include cultural resource surveys and assessments to identify any historic properties that could be affected by the proposed action, along with plans for avoidance, minimization, or mitigation of adverse effects.
- **Clean Water Act (CWA):** The CWA regulates discharges of pollutants into waters of the United States. Project-level actions that may involve discharges (e.g., erosion from construction activities, application of pesticides near waterways, dredge and fill activities in wetlands) will require adherence to the CWA, potentially including obtaining permits from the U.S. Army Corps of Engineers or the Environmental Protection Agency (EPA), often coordinated through the BIA. NEPA documents must analyze potential impacts to water quality and identify any necessary permits or mitigation measures.
- **Clean Air Act:** This Act regulates air emissions from various sources. Project-level actions that could impact air quality, such as large prescribed burns (considering smoke emissions) or the use of heavy equipment, must consider compliance with the Clean Air Act and any relevant state or local air quality regulations. NEPA documents should assess potential air quality impacts, including greenhouse gas emissions where applicable, and identify any required permits or mitigation strategies.
- **Migratory Bird Treaty Act (MBTA):** This Act protects migratory birds, their nests, and eggs. Project-level activities that could potentially harm migratory birds (e.g., vegetation removal during nesting season) must consider the MBTA and incorporate measures to avoid or minimize impacts.
- **Executive Order 12898 (Environmental Justice):** This order directs federal agencies to identify and address disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority populations and low-income populations. Project-level NEPA analysis should consider potential environmental justice concerns and ensure fair and equitable treatment in the decision-making process.
- **Tribal Trust Responsibilities and Consultation:** Beyond specific federal environmental laws, the BIA has a trust responsibility to protect tribal resources and consult with the Tribe on actions that may affect their interests. Meaningful tribal consultation must be an integral part of both programmatic and project-level NEPA processes. This involves early and ongoing communication, providing the Tribe with relevant information, and considering their input and concerns in the environmental analysis and decision-making.

IV. Documentation and Public Involvement:

NEPA requires the preparation of specific documents to analyze environmental impacts and inform decision-making. These documents, such as Environmental Assessments (EAs) and Environmental Impact Statements (EISs), must be made available for public review and comment. Public involvement is a key component of NEPA, ensuring transparency and allowing stakeholders to provide input on proposed federal actions. For project-level actions related to the WFMP, the BIA will typically manage the NEPA documentation and public involvement process, in coordination with the Tribe.

By diligently adhering to the NEPA process at both the WFMP and project levels, and by carefully considering the key environmental laws and engaging in meaningful tribal consultation, the La Jolla

Indian Reservation can ensure that its wildfire management activities are conducted in an environmentally responsible and legally compliant manner, protecting its valuable natural and cultural resources for present and future generations.

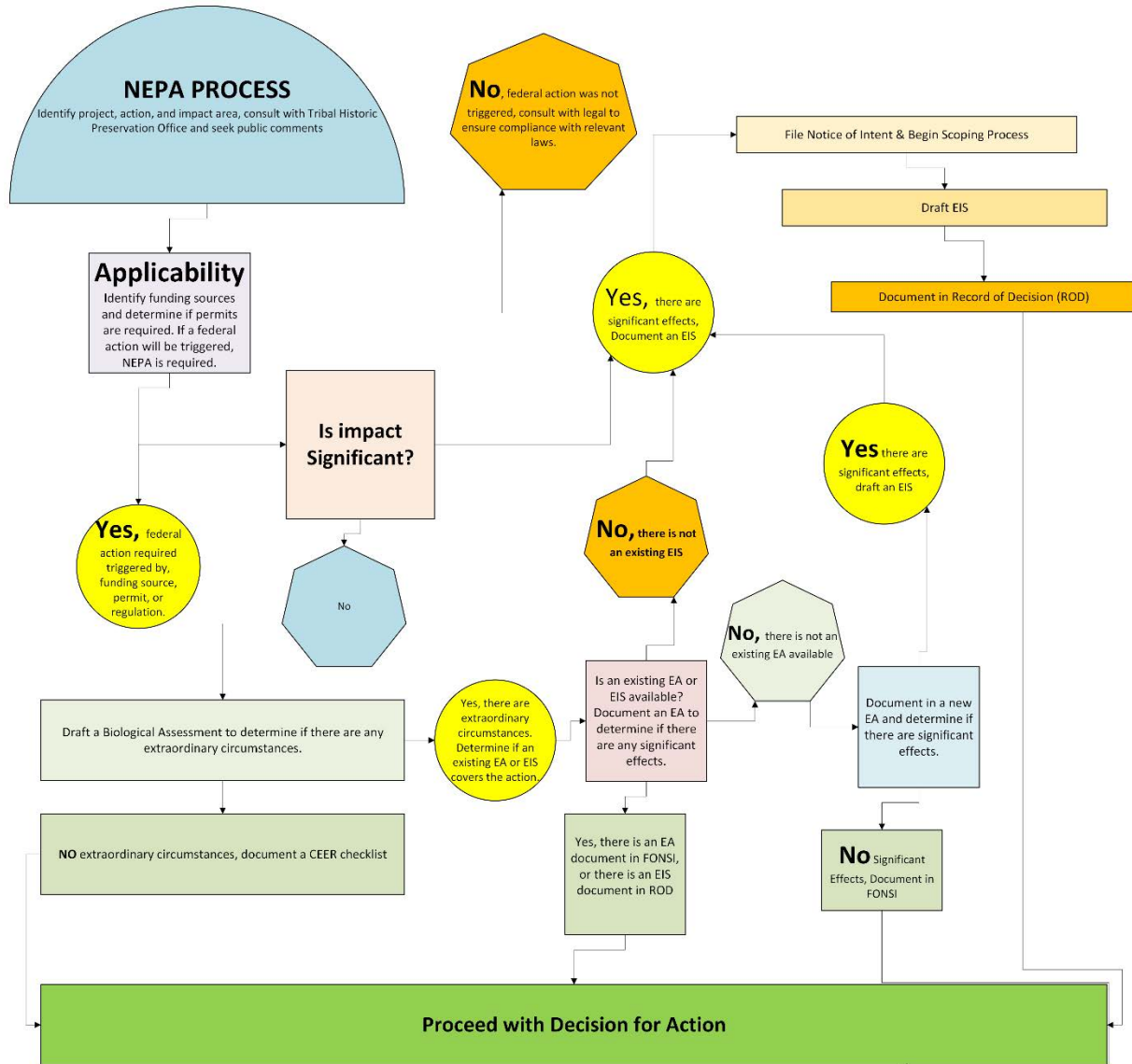


Figure 1 Figure 2. NEPA Decision Matrix

PERMIT CONDITIONS

You May Burn	You May NOT Burn
• Yard clippings, brush, and other vegetation • Paper, paper products, or cardboard, only if: • Used to start a fire • Produced and burned at a single-family residence • Produced and burned at a building with four or fewer apartments or housing units AND Piles 4 feet or less in diameter and less than 4 feet high	• Garbage • Plastic • Hazardous waste • Dead animals or parts of dead animals • Junked motor vehicles • Tires • Asphalt • Construction or demolition waste • Treated lumber or timber • Pesticides or packaging • Batteries • Light bulbs • Asbestos • Pathological organisms • Insulated wire • Any material that makes dark smoke other than vegetative materials

Burning must be conducted in compliance with 49 CFR 49.131 General Open Burning and 49.132 General Open Burning Permits

Who to Contact for more Information:

La Jolla Reservation Fire
Department:
760-742-3771

Smoke impacts on public roads, daycares, medical facilities, elder homes and other sensitive people or areas must be prevented as a condition of this permit. Burning is not permitted during burn bans or air pollution episodes, or when the Fire Department or EPO determines that burning will cause an adverse impact to air quality. This permit is part of a fire management program administered by the La Jolla Band of Luiseno Indian Tribe to manage residential pile burning, control emissions of air pollutants and manage smoke for air quality purposes. These rules apply to any person within the exterior boundaries of the La Jolla Indian reservation.

We appreciate your comments or feedback.
Please write below.

Please return your permit to the
La Jolla Reservation Fire
Department

Thank you.

Q: Why do I need a permit?

A: Smoke from open burning is an air pollutant with effects on air quality and public health (especially for children and the elderly).

Q: What are some alternatives to outdoor burning?

A: Chipping and shredding vegetation for composting. Also, household items such as glass, plastics and paper can be recycled and should not be burned.

Q: How can I burn more cleanly?

A: Make sure your fuel is as dry as possible, separate the fire from damp ground and be sure there is enough draft to keep the fire burning hot.

Q: Are there exceptions?

A: Cultural, traditional and recreational fires are exempt and do not require a permit.

APPENDIX E: RESOURCE PROTECTION GUIDELINES

La Jolla Reservation Fire Department

Date: _____

Resource Protection Guidelines

Please ensure the fire department is able to defend your home in the event of a wildfire, homes that do not have defensible space will not be defended to increased danger to fire personnel. Call the fire Department for a full inspection.

Owner/Tenant:		Address:	
Inspection No. ☐ ☐ ☐	Inspector Name:	Contact Number:	No hazards observed ☐

Zone 1 / Within 30 of all structures or to the property line (Refer to illustration below):

- CHECKED BOXES INDICATE VIOLATIONS**
- ☐ A. Remove all branches within 10 feet of any chimney or stovepipe outlet.
 - ☐ B. Remove leaves, needles or other vegetation on roofs, gutters, decks, porches, stairways, etc.
 - ☐ C. Remove all dead and dying trees, branches and shrubs or other plants adjacent to or overhanging buildings.
 - ☐ D. Remove all dead and dying grass, plants, shrubs, trees, branches, leaves, weeds and needles.
 - ☐ E. Remove or separate live flammable ground cover and shrubs.
 - ☐ F. Remove flammable vegetation and items that could catch fire which are adjacent to or below combustible decks, balconies, and stairs.
 - ☐ G. Relocate exposed wood piles outside of Zone 1 unless completely covered in a fire resistive material.

Zone 2 / Within 30-100 feet of all structures or to the property line (Refer to illustration below):

- ☐ H. Cut annual grasses and forbs to a maximum of 4 inches in height.
- ☐ I. Remove fuels in accordance with the Fuel Separation or Continuous Tree Canopy guidelines (see back).
- ☐ J. All exposed woodpiles must have a minimum of ten feet (10 feet) clearance, down to bare mineral soil, in all directions.
- ☐ K. Dead and dying woody surface fuels and aerial fuels shall be removed. Loose surface litter, normally consisting of fallen leaves or needles, twigs, bark, cones, and small branches, shall be permitted to a maximum depth of three inches (3 in.).

Defensible and Reduced Fuel Zone / Within 100 feet of all structures or to the property line (Refer to illustration below):

- ☐ L. Logs or stumps embedded in the soil must be removed or isolated from other vegetation.

Other Requirements:

- ☐ M. Outbuildings and Liquid Propane Gas (LPG) storage tanks shall have ten feet (10 ft.) of clearance to bare mineral soil and no flammable vegetation for an additional ten feet (10 ft.) around their exterior.
- ☐ N. Address numbers shall be displayed in contrasting colors [4" min. size] and readable from the street or access road.
- ☐ O. Equip chimney or stovepipe openings with a metal screen having openings between 3/8 inch and 1/2 inch.

COMMENTS:

IMPORTANT

All concerns marked must be addressed by the owner/tenant within 30 days of the inspection date. A reinspection of the property will occur after the 30-day compliance timeframe.



KNOW THE LAW BE FIRE SMART

100 FEET OF DEFENSIBLE SPACE IS RECOMMENDED BY THE FIRE DEPARTMENT. CALIFORNIA BUILDING CODE CHAPTER 7A REQUIRES CERTAIN CONSTRUCTION MATERIALS AND METHODS FOR HOMES IN WILDLAND AREAS, WHILE CALIFORNIA LAW IS NOT APPLICABLE TO THE LA JOLLA INDIAN RESERVATION. BE SURE TO CONTACT YOUR LOCAL FIRE DEPARTMENT FOR ADDITIONAL REQUIREMENTS TO ENSURE YOUR HOME IS FIRE SAFE AND ABLE TO BE PROTECTED IN THE EVENT OF A WILDFIRE.

READYFORWILDFIRE.ORG/THELAW

WILDFIRE IS COMING. ARE YOU READY?

HARDENING YOUR HOME

Flying embers can destroy homes up to a mile ahead of a wildfire. Prepare (harden) your home now before a fire starts.

Priority list for building or remodeling with ignition-resistant* materials:

- Roof (Above all else your roofing is the most important hardening feature)
- Eaves and Soffits
- Walls
- Decks
- Patio Cover
- Fencing

Other priority activities:

- **Vents:** Cover and protect all openings.
- **Windows:** Protect against blow-outs and install dual-paned windows.
- **Rain Gutters:** Screen or enclose.
- **Chimney:** Cover outlets with non-combustable screens.
- **Garage:** Have an accessible fire extinguisher.
- **Driveways:** Ensure access to your home complies with local fire codes.
- **Water Supply:** Get multiple garden hoses that are long enough to reach all areas of your home.

*Visit ReadyforWildfire.org/hardening-your-home for detailed information on ignition-resistant building materials and all home hardening activities.

This form was based on a CAL FIRE inspection form and adapted to address fire resource protection guidelines on the La Jolla Indian Reservation.



VERTICAL SPACING

Eliminate opportunities for a vertical "fire ladder" by:

- Remove branches beneath large trees for a 6 foot minimum clearance.
- Create proper vertical spacing between shrubs and the lowest branches of trees by using the formula shown.

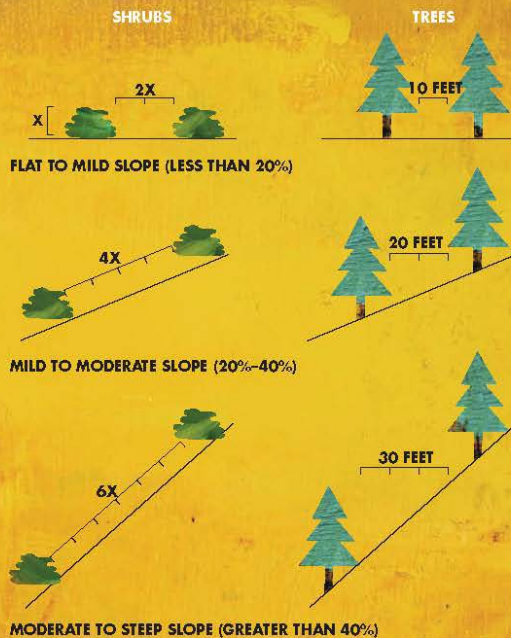


HORIZONTAL SPACING

The spacing between grass, shrubs, and trees is crucial to reduce the spread of wildfire. The spacing needed is determined by the type and size of the shrubs and trees, as well as the slope of the land. For example, a property on a steep slope with larger plant life will require greater spacing between trees and shrubs than a level property that has small, sparse vegetation.

Fire-safe landscaping

Fire-safe landscaping isn't necessarily the same thing as a well-maintained yard. Fire-safe landscaping uses fire-resistant plants that are strategically planted to resist the spread of fire to your home.



DOWNLOAD THE READY FOR WILDFIRE APP

It's never been more important to keep on top of preparing your family, home and property for a wildfire. Fires are on the rise, and are burning hotter, faster and more unpredictably than ever before. Download the app to:

- Get custom wildfire alerts
- Track your progress
- Get detailed action steps



APPENDIX F: POST-TREATMENT ASSESSMENT REPORT (TEMPLATE)**Project Description:**

Name of Project	<i>NFPORS identifier, PCAS accounting code</i>
Project Location	<i>Agency/Reservation, coordinates, legal description, quad map name(s)</i>
Type of Project	<i>RX fire, mastication, hand thinning/piling, WUI, Non-WUI</i>
Vegetation Type	<i>Forest type, LANDFIRE zone, Fuel Model (Scot/Burgan), Fire regime condition class.</i>
Management Objectives	<i>Fuels reduction, stocking control, species composition, cultural resources, wildlife habitat</i>

Treatment Chronology:

Treatment Specifications	<i># of acres treated, firing techniques applied, type of mechanized equipment used, personnel involved, schedule of treatments</i>
Notable events	<i>Precipitation/weather events, favorable conditions, unexpected fire behavior, equipment malfunctions, smoke behavior, public response</i>
Logistical Requirements	<i>Amount and types of resources used, hours logged, amount of fuel consumed, road conditions, communications</i>

Monitoring Methodologies:

Monitoring applied	<i>Sampling protocols applied, # of plots installed, relieve'/statistical, permanent/temporary plots, control/measure plots, photo plots</i>
Schedule of Monitoring	<i>Timing of pre and post treatment data collection, fire behavior data collection processes, need for further sampling</i>
Data Analysis and Storage	<i>Analyses conducted, responsible person, location, and format of data</i>

Data Analysis

Pre-treatment conditions	<i>Fuel loading, stocking levels, species composition, crown base height, cover frequency,</i>
Post-treatment conditions	<i>Fuel loading, stocking levels, species composition, crown base height, cover frequency,</i>
Fire Behavior	<i>Flame length, flame height, rate of spread, weather observations, live fuel moisture readings, smoke observations,</i>
Data Analyses Conducted	<i>FIREMON data analysis tool, other software packages, statistical analyses, other resource considerations</i>
Graphic presentation of results	<i>Graphs, tables, photos, maps, narratives</i>

Project Evaluation:

Treatment Effectiveness	<i>Were objectives met, what was successful, what was ineffective,</i>
Impacts on Ecological Conditions	<i>Pre and post FRCC, influence on adjacent areas, long term implications</i>
Effectiveness of Monitoring Activities	<i>Proper protocols used, sampling size, timing of measurements, analyses applied,</i>

Recommendations:

Adjustments to RX	<i>Recommended changes to treatment prescription?</i>
Logistical Adjustments	<i>What could be done to increase the effectiveness of resources?</i>
Follow-up treatments	<i>What can be done to increase the effectiveness of treatment?</i>
Monitoring Adjustments	<i>What can be done to increase the effectiveness of monitoring?</i>

APPENDIX G: ANNUAL MONITORING WORK PLAN

Agency/Tribe/Region:___ Year___

Prepared by:_____ Phone:_____ e-mail:_____ Date prepared:_____

Projects to be Monitored.

Project Name	Treatment Type	Acres	Number of Plots Planned by Level					Date(s) Scheduled to be Measured	Protocols to be Used	Est. Staff Hours Req.	Est. Monitoring Cost
			1	2	3	4	Total				
									(Example: FIREMON PD, TD, SC, FL)		

Total plots for annual work plan =

Staffing and scheduling

Supervisor of monitoring project:

Estimated total staff hours to implement monitoring work plan:

Range of dates when monitoring is scheduled to occur:

Constraints on monitoring dates:

Appendix H: Basic smoke monitoring data sheet

For use on prescribed fires not expected to have smoke impacts on sensitive or critical receptors

Adapted from USDI National Park Service (2003). Fire Monitoring Handbook. Boise (ID): Fire Management Program Center, National Interagency Fire Center.

Plot ID: _____

Date: ____ / ____ / ____

Burn Unit/Fire Name—Number: _____

Recorder(s): _____

Date	Time	Observer Location and Elevation	Elevation of Smoke Column Above Ground	Smoke Column Direction	Approx. Elevation Smoke Inversion Layer Above Ground	Fireline Visibility	Roadway Visibility	Which Illustration (See Back) Best Describes the Smoke Column (Circle One)
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3
								1 - 2 - 3

APPENDIX-I: DETAILED SMOKE MONITORING DATA SHEET

Plot ID: _____
 For use on prescribed fires expected to have smoke impacts on sensitive or critical receptors
 Burn Status (Indicate number of times treated, e.g., 01 Burn, 02 Burn, etc.): _____-Burn

Date: ____/____/____

Burn Unit/Fire Name-Number: _____ Recorder(s): _____

Monitoring Variable (RS)	Each box on the data sheet is divided in two; place the time of your observation in the top portion of the box, and the observation value in the lower portion of the box.														Recommended Thresholds	
Fireline Visibility/CO (ft, m)															Visibility <100' Exposure NTE 2 h	
Highway Visibility (ft, m)																
Visibility Downwind (mi, km)															Pop. 0-5 K 5 K-50 K >50 K	Min. Dist. 3-5 miles 5-7 miles 7-9 miles
Mixing Height (ft, m)															Maintain 1500'. Do not violate for more than 3 h or past 3:00 PM.	
Transport Wind Speed (mph, m/s)															5-7 mph at mixing height. Do not violate for more than 3 h or past 3:00 PM.	
Surface Wind Speed (mph, m/s)															1-3 mph-Day 3-5 mph-Night No violations over 1 h	
Complaints (Number)															Consult local Air Quality Control District Regs. Do not exceed 5/treatment	
CO Exposure (ppm or duration)															Discretion of PBB. Refer to park FMP or PBP.	

OTHER

1. Total Emissions Production (Tons/Acre or kg/ha): _____ Fuel Load Reduction (Total): _____
2. Preburn Fuel Load Estimate (See PBP): _____ Postburn Fuel Load Calculation
3. Particulates (Amount/duration)—If Applicable: $\approx$ _____ (Specify Cycle)
4. Other Monitor Observations:

APPENDIX-J: ANNUAL MONITORING SUMMARY

Agency/Tribe/Region:___ Year___

Prepared by:_____ Phone:_____ e-mail:_____ Date prepared:_____

Project Name	Treatment Type	Acres	Number of Plots by Level					Date(s) Measured	Protocols Used	Actual Staff Hours Req.	Annual Monitoring Cost
			1	2	3	4	Total				

Summary Statistics

	Prescribed Fire					Mechanical					Other				
	1	2	3	4	Total	1	2	3	4	Total	1	2	3	4	Total
Number of Plots by Level															
Avg. number of plots per treatment															
Avg. monitoring cost per treatment															

Distribution of Summary *(list individuals and offices who will receive a copy of this summary):*

