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## Section 3: **Issues for Organizational Leaders**

Many of the problems and challenges that wildland fire IMTs faced in the 2004 Hurricane Response effort were the result of systemic disconnects between FEMA and the USFS/NWCG response structures. These produced a wide range of problems and solutions as individuals coped with an unstructured interagency dance. This has remained an ongoing problem that has yet to be resolved in a way that enables firefighting resources to be used in an effective, efficient and appropriate way. The disconnect stems from a combination of factors, but the most prevalent are the inability of FEMA to change and improve quickly, and the assumption by management that wildland fire does not need to.

The future of emergency response in the U.S. has been moving steadily toward the increased involvement of the wildland fire agencies and their Incident Management Teams. FEMA respondents imply that FEMA is more than willing to employ these resources in a variety of missions, and the more the better. The leadership of the Departments of Agriculture and Interior has gone on record as readily endorsing the use of wildland fire resources as part of the Department of Homeland Security response, which has included tasks ranging from exotic disease control, to the 9/11 site logistics, to Space Shuttle recovery activities.

Where once a part-time or occasional occurrence, all-risk emergency response has quickly turned into a growing concern and distraction for fire management personnel. Some feel that situations like the 2004 Hurricane Response, which involved 17 Incident Management Teams and four Area Command Teams, have brought the wildland fire community to a crossroads decision point – a) to perform these missions professionally with full commitment and purpose and in concert with other firefighting duties or b) narrowly limit the exposure and commitment.

## Are We “In” or Are We “Out”?

*We are victims of our own success. Our “can do” attitude has other agencies turning to us for help....When FEMA goes to ESF#8 (Mass Care) they should call in ESF#4 and ESF#4 should be on site first.*  
- Area Commander

*We have problems with others agreeing to do work that we can't or shouldn't be doing. The Secretary of Agriculture would like us to fix fences and clear orchards, but FEMA can't pay for work like that on private land.*  
- ESF#4

*“We are not organizationally prepared to be doing this work – we need to quit kidding ourselves.”*  
- Incident Commander

By far the biggest and most salient organizational question emerging from the 2004 Hurricane Response effort was summarized in the phrase, “*Are we in, or are we out?*” Until now, wildland fire has used tried and true firefighting systems and processes to respond to all-risk missions. In some cases, such as the Columbia Shuttle Recovery Mission, respondents report that these systems worked relatively well to meet the mission of conducting ground searches and aircraft management.

There is no disagreement from either wildland fire resources or FEMA that the wildland fire personnel and Incident Management Teams bring value to a national disaster response effort. Many wildland fire respondents, however, questioned the level of effectiveness of their efforts and the costs, both financially and psychologically. Among the respondents in management or leadership roles interviewed, there appears to be no agreement about the proper role of wildland fire personnel in the business of disaster recovery and security response. Doctrinal guidance is scant.

Behind the waste, dysfunction and frustration documented in this and similar predecessor reports, are unresolved questions concerning the National Response Plan, and specifically what operations the wildland fire agencies are prepared to do under it. For several years the USFS has been pulled into service to support an increasingly wide variety of duties under ESF#4, and through NWCG, has pulled in personnel from other wildland fire agencies to assist.

The increasing use and misuse of fire resources during FEMA operations has produced an increasing awareness and self-examination about what the all-risk world really means to the wildland fire agencies and their workforce. If the agencies are “in”, then many questions should be deliberately answered with regard to workforce development and suitability for these assignments, and at the core, the question of whether wildland fire can continue to operate all-risk as an extension of wildland fire operations and doctrine. The size and scope of the 2004 Hurricane Response effort indicates that the current ways of doing business may no longer be viable or appropriate.

Many respondents in this study expressed the desire to see the wildland fire community take a more serious role in preparing for and executing the all-risk FEMA mission, including a commitment to build the policies, tools, doctrine, training, and experience a workforce needs to prosecute the mission correctly and professionally. This need was seen as a national concern – as the regional requirements to provide on-the-job training and information to fill the experience and knowledge gaps has become overwhelming. The definition of the “dance” between FEMA and the wildland fire community will likely need to go far beyond NIMS and IMT operations. A strategic plan is likely necessary to extend the agencies into the new all-risk world in a sustainable manner.

The following content is a composite discussion that was held in many places with many different respondents during the interviewing process, all relating to the larger question about the wildland fire community’s role in the national response structure, and what it means to the wildland fire agency and its people. It was felt that without addressing these issues and questions, the role of wildland fire within these incidents would remain difficult and fraught with problems.

### ***Can Do vs. Should Do***

At the root of the discussion is the question of whether firefighters are the best people to be performing FEMA damage assessments, building software spreadsheets to track trucks, and staffing critical care centers. FEMA respondents stated that the critical skill that Incident Management Teams bring to the disaster response effort isn’t so much “incident management expertise”, but rather the presence of a large, quickly deployable, organized workforce of able bodies that comes almost self-contained and is under a command and control structure. This is reflected in the common comments by IMTs that the logistical mission assignments given by FEMA were generally not technically challenging on an incident command skill level.

Across the workforce there is little known as far as the doctrinal boundaries to what wildland fire is willing to do in the support of FEMA. Until this point, mission acceptability has been created on the spot by FEMA with some involvement of the ESF#4 position. In this response effort, Washington D.C.-based managers and directors reportedly crafted ad hoc solutions and missions on both the USFS and FEMA sides, sometimes apart from ESF#4 and other strategic managers.

During the collection effort, interviewers heard disparate philosophies concerning what the wildland fire personnel should be doing, how they should be deployed, and what types of missions they should do. Responses ranged from “We should be taking over FEMA’s job,” to “We shouldn’t be here.” If there is a nationally determined philosophy concerning the wildland fire responder scope of work, it has not been effectively communicated.

Given the increasing demand for IMT participation in national events, the need for defined boundaries on missions and participation should be developed by the national offices of the wildland fire agencies.

### ***Development of All-Risk Doctrine***

Abundantly clear is the fact that all-risk assignments can be fundamentally different than the business of firefighting – which has been made relatively manageable and predictable through a long history of specializing, testing, and process evolution. Although ICS is the framework for wildland firefighting, the systems, processes and people that perform the work have also been highly specialized for the firefighting mission. Many of the stories related by participants in the 2004 Hurricane Response indicate that this process and tool specialization is not a good fit for the new emergency response mission.

Respondents were only able to identify a handful of post-incident reports and briefing packages that contributed to doctrine for hurricane response. There is little, if any, doctrinal guidance concerning wildland firefighters participating in all-risk assignments in general, or guidance that delineates what parts of existing firefighting doctrine applies to all-risk situations. Some operations personnel felt that the prospect of shoehorning firefighting doctrine into a hurricane response effort, and then having to make large numbers of exceptions ad hoc, posed a risk that undermined the existing doctrine and firefighting mission.

Following this incident, many participating groups planned to conduct detailed After Action Reviews of their part of the response. Collectively, with this report, they may provide a good foundation from which to begin the development of an all-risk doctrine.

Respondents generally accepted the goal of importing ICS into the all-risk environment, but stopped short of saying that wildland firefighting methods and standards were appropriate for these events.

Beyond meeting the needs of the workforce, the most salient and powerful outcome of doctrine development could be the smoothing and formalizing of the operations between FEMA and the wildland fire agencies. Formalized all-risk doctrine could form the base for process development and FEMA educational efforts, and potentially elevate the FEMA relationship beyond a basis of personal relationships only.

### ***Policy Development***

Apart from mission capability (can do), are the questions concerning the ethics, liability, legality and sustainability of mobilizing the agency's wildland firefighter workforce for national response duty as a standard practice (should do). Many respondents expressed discomfort with the way that fire policies and practices were being globally applied to work that was not firefighting. Disagreements about what NWCG practices applied and where agency policy trumped NWCG were reported.

Dissatisfaction expressed with the base-8 burden being placed on the local units, seemingly arbitrary funding limitations, and discrepancies between FEMA and USFS pay for similar tasks, was a cause of consternation with employed resources. Gaps and incompatibilities between financial and procurement systems and policies cause ongoing adaptation and waste. One respondent posed the question, "Will it really do us much good to get FEMA into ICS, if the ordering and reporting systems are still [dysfunctional]?"

### ***Mission and Risk Integration***

Several respondents posed general questions relating to what would have happened had an incident of this magnitude occurred during a busy fire season. As an all-risk player, the wildland fire agencies may soon be faced with balancing an increasing responsibility for a non-cyclical national emergency response with traditional seasonal firefighting duties.

Beyond impacts to firefighting resource availability is the risk that the all-risk mission poses to other preparedness, fuels reduction, prescribed fire, and non-fire missions that have not diminished. The resource drains on the workforce in the forms of availability and fatigue could be substantial. Local budgets could be considerably impacted in the wrong year. Respondents reported that national emergency responses are generally not included as part of agency strategic planning processes.

### ***Training and Preparedness***

The USFS Southern Regional Operations and the IMTs located in the southeastern U.S. have spent considerable time and effort to collect lessons learned from their work in prior hurricane efforts. USFS Regional Operations spent extensive time during the response effort in providing just-in-time familiarization training to arriving resources. Similarly, departing IMTs spent extra time to brief and sometimes train incoming personnel to the situation and the processes emplaced to date. This training burden was substantial. These activities were primarily directed at IMT staff, which then passed some of the information on to the team in subsequent briefings. The effectiveness of these activities was hard to measure, but the scope was admittedly small.

Without exception, the training need for serving in these environments was voiced, but suggestions advocated many possible solutions. Some respondents advocated briefing guides or checklists, while others suggested entire training programs or certifications.

Several IMT respondents suggested that the S-520 Advanced Incident Management course be modified to include all-risk or hurricane scenario, however questions were raised about support requirements for personnel who do not attend this training program, including Type 2 IMT personnel.

ESF#4 training and certification was also widely indicated.

Beyond technical training, skills in effective communication, leadership and conflict resolution were highly valued during the incident, indicating that all-risk training programs may need to include material related to these subjects. The question of whether all-risk training curriculums should be part of the NWCG core training mandate was not discussed, but remains a question for management to consider.

### ***FEMA Training and Presenting a Unified Front***

Some FEMA respondents openly remarked that the USFS and other wildland fire agencies needed to educate FEMA operations on what missions IMTs could accomplish, and how best to order and employ them in these incidents. While this education responsibility was widely accepted, the contents of this educational mission do not appear to be well understood or consistent.

In the 2004 Hurricane Response, FEMA education activities were conducted ad hoc, and were initiated based upon the strength of previously established personal relationships. The “example” of ICS implemented by various IMTs in the response varied, as discussed earlier, but it is unknown if FEMA personnel noticed the inconsistency. In most cases, FEMA training or mentoring activities were not coordinated well within the USFS. This sometimes resulted in unintended consequences when non-standard practices used to facilitate training were questioned by other operational units.

## Analyst Comments—Forging a Larger Solution

At one time, the wildland fire community was a loose collection of agencies and organizations working in fire part-time with few common processes and procedures. Until meaningful standards were put into place, firefighting was a business built primarily on personal relationships. Over the span of 40 or 50 years, wildland fire agencies have built common doctrine and support systems for training, standards, processes, and the science of fighting wildland fire, as well as for managing long-term and large incidents. To support this transition, the wildland fire community built a professional core of personnel specifically to handle fire operations. More than 15,000 full-time and 25,000 part-time operations personnel now handle these operations.

FEMA became involved in emergency response in 1993. It consists of 2,500 full-time employees and 5,000 part-time reservists, most of who are not focused in emergency response operations. These reservists are citizens from varied walks of life, who leave their jobs and families to participate in emergency relief activities. In the 2004 Hurricane Response, wildland fire IMTs reported to FEMA leaders who included “real life” car salesmen, managers, merchants, and retired fire chiefs. Understandably, this type of pool is widely varied in incident management experience, technical and interpersonal skills, leadership, work ethic, and general ability. They do not have the opportunities of their wildland fire counterparts to train and to participate regularly in operations. This ad hoc workforce situation also tends to undermine the ability of FEMA to set operational and qualification standards, develop culture, and learn from past experiences and educate personnel accordingly. Given its roots, it is understandable that FEMA’s organization and doctrine is less mature and more transitory than that of the wildland fire community or the military. Waiting for FEMA to change to “be like wildland fire” is using hope as a plan.

In the 2004 Hurricane Response, FEMA was taken beyond the limits of its capacity and given the responsibility for managing unprecedented numbers of wildland fire resources. The opportunity for friction and disappointment was omnipresent. Although extreme in an historical context, the incident echoes past FEMA-wildland fire cooperative experiences, and it is a likely glimpse of the future as the use of wildland fire resources continues to increase.

Wildland fire responders participating in the 2004 Hurricane Response effort expressed widespread dissatisfaction with the way that FEMA utilized personnel and IMTs. In some cases, responders voiced disappointment in the unprofessional conduct of some individuals working for FEMA. Given FEMA’s design, construction, and culture, wildland fire’s expectation of performance is mismatched against FEMA’s realistic ability to perform. These unmet expectations are a source of ongoing dissatisfaction and frustration, which has, by many accounts, existed for years.

For the future, the parent departments of the wildland fire agencies have choices. First, to let the situation evolve and hope that NIMS compliance will soften the problem. Second, they can reduce involvement in disaster assistance because it does not represent an effective use of wildland fire resources or personnel. Third, they can go “in” and take a more proactive and planned role in the emergency response effort. Fourth, as a last option, they can achieve “success” through lowered expectations.

Expecting NIMS and the National Response Plan to resolve these issues seems a bureaucrat’s natural choice, and appears to be the path of choice presently. While NIMS will hopefully correct some of the chain of command and authority issues, it will not address other core operating practices about how and why wildland fire resources are used in disaster events. The soon-to-be-

released National Response Plan (*NRP*) will undoubtedly attempt to address the mechanisms that activate and assign mission resources to some extent. It is unknown how the *NRP* will affect the reality on the ground, but without additional doctrine, SOPs or agreements beyond the *NRP*, FEMA will probably continue to underutilize Type I Incident Management Teams to execute relatively simple staging and distribution operations. As long as FEMA unleashes goods and materials to the ground similar to the way they do now, a simple logistical staging area will remain an “incident” to be managed, and IMTs will find themselves “managing” organizational dysfunction as much as do the technical mission.

Also unknown is whether ICS can be truly adopted by FEMA in a way that fundamentally changes their operating practices. Although wildland fire respondents felt that having FEMA adopt ICS would be very helpful, there was less confidence that FEMA could adopt the cultural values and changes that are at the heart of successful execution of ICS in a multi-agency environment. Some of the adoption of ICS amounts to a willingness to step away from the positional rank framework into a competency-based qualification system. Although FEMA is relatively small, the transitory nature of the workforce will likely mean that any change will be slow, even if forcefully directed.

The development and release of NIMS and the *NRP* will not answer the larger organizational question of “in or out.” “Out” is an unlikely option given the past commitments and the intellectual monopoly that wildland fire has on executing long-term, large-scale strategic incident management. Limiting the use of individual fire resources might be plausible, but it is doubtful that the IMTs could be freed from these duties for several years.

Getting “In” the response business in a more committed and professional manner would mean significant work and changes that could extend far beyond the changes required for NIMS compliance. These changes could extend to workforce levels, training and qualification requirements, software, financial and management systems, and national SOPs and protocols with regard to mission suitability and resource use. It is clear that this coordination, education, and cooperation effort must come from the ones who are suffering under the current system, and can best engineer the solutions that will work—the agencies that fight wildland fire.

Over the past years there have been many attempts by individual IMT members and managers to reach out to FEMA and provide guidance and training. Many in FEMA have welcomed and support this, but generally these efforts have collectively failed to provide long-term solutions—partly because of the lack of wildland fire coordination and mandate, and partly because of FEMA’s ongoing organizational instability and immaturity.

Beyond the option of doing something, there is always the option of doing nothing and lowering expectations of FEMA so that disappointment is avoided. This option, while easiest to achieve, is the least palatable to swallow, especially for the wildland fire culture and those personnel who follow.

FEMA will remain in need of guidance and assistance on incident practices because the core of successful ICS implementation is not rooted in process understanding so much as it is in culture, technique, and attitude. However, these are generally not taught in ICS training courses. The art of implementing ICS still must be taught to other agencies, and, whether “in” or “out,” wildland fire will have an ongoing role in that educational effort, organized or not. All options are costly, but if “change” is the selected course of action, then the onus is on the wildland fire community and the parent departments to start it, guide it, and sustain it—even if FEMA is technically still in charge.

–L. McDonald