

NATIONAL WILDFIRE COORDINATING GROUP

Resource Advisor Subcommittee (READ SC)

READ SC Memorandum 2022-01

September 27, 2022

TO: NWCG Incident Business Committee

FROM: Linn Gassaway, Chair, NWCG Resource Advisor Subcommittee

SUBJECT: Fireline Resource Advisor and Archaeologist Hazard Pay Justification

Purpose: The NWCG READ SC supports the authorization of hazard pay differential for qualified Fireline Resource Advisors (REAF) and Archeologists (ARCH) when working in a direct fire suppression support capacity on an uncontrolled fireline.

Background and Coordination: In the past, the denial of hazard pay for REAFs and ARCHs has occurred periodically on wildfire incidents. The acceptance or denial of hazard pay coding for these positions has been addressed inconsistently across Incident Management Teams. As a result, there have been cases in which this has resulted in change in the application of shift coding from one day to the next on the same incident as well as inconsistencies among incidents.

Issue/Action: Currently, Resource Advisors (READ, REAF, and ARCH) are deemed agency-specific Technical Specialists as described in the <u>NWCG Federal Wildland Fire Qualifications Supplement</u>. The <u>2021 NWCG</u> <u>Standards for Interagency Incident Business Management</u> identifies specific categories which entitle GS-scale federal employees to hazard pay on wildland fire incidents:

- Flying: Individuals who are on board the aircraft during limited control flights.
- **Groundwork Beneath Hovering Helicopter:** Participating in ground operations to attach an external load to a helicopter hovering just overhead.
- Work in rough and remote terrain: Working on cliffs, narrow ledges, or near vertical mountainous slopes where a loss of footing would result in serious injury or death, or when working in areas where there is danger of rock falls or avalanches.
- Firefighting: Participating as a member of a firefighting crew in fighting forest and range fires on the fireline before the fire is controlled. This includes single resource personnel assigned to the fireline.

Of these categories, REAFs and ARCHs are engaged in **firefighting** and **working in rough/remote terrain** on a regular basis. On some incidents, Resource Advisor positions are also engaged in limited control flights in support of incident objectives related to the protection of natural and cultural resources.

- o Firefighting
 - Appendix A to Subpart I of 5 CFR 550 lists the specific duties to determine if hazard pay is applicable for general schedule employees. The Incident Business Handbook describes the term firefighting as "Participating as a member of a firefighting crew in fighting forest and range fires on the fireline before the fire is controlled." This includes single resource personnel assigned to the fireline.
 - REAFs and ARCHs are often engaged on the fireline assisting with suppression activities as a single resource with crews and other single resources. REAFs and ARCHs are on the fireline assisting with suppression line placement, designing suppression actions to protect avoidance areas, guiding Minimum Impact Suppression Tactics, and at times assisting in fighting fire as incident line personnel.

REAFs and ARCHs conduct tasks in the same locations as fireline operational resources such as FOBS, TFLD, HEQB, and DIVS. Like these positions, REAFs and ARCHs contribute to the management of the fire relative to the stated incident objectives and measures identified in the Delegation of Authority and Incident Action Plan. REAFs and ARCHs regularly clear fuels around sensitive resources, advise and participate in structure protection in areas of active fire behavior, map the location of firelines, and advise heavy equipment and crews on the implementation of suppression repair actions. REAFs and ARCHs are typically identified in the Delegation of Authority by the Incident Commander and Agency Administrator as a critical component of the management of a wildfire.

• Work in rough and remote terrain

As defined in the <u>2021 NWCG Standards for Interagency Incident Business Management</u> handbook, "Working on cliffs, narrow ledges, or near vertical mountainous slopes where a loss of footing would result in serious injury or death, or when working in areas where there is danger of rock falls or avalanches." REAFs and ARCHs are often required to work independently in such conditions, scouting areas and providing critical resource information to incident management teams and incident personnel on the fireline.

The NWCG READ SC recommends that hazard pay for REAFs and ARCHs be supported uniformly across all incidents when assigned on a fireline performing direct suppression support actions. To complete their incident assignments and responsibilities, REAFs and ARCHs are exposed to the same hazards, environmental conditions and risks that cannot be mitigated and warrant hazard pay for all resources working within an uncontrolled fireline in a direct suppression capacity.

Granting hazard pay to all fireline-based personnel is a directive supported by the NWCG Standards for Interagency Incident Business Management. As previously stated, hazardous conditions encountered by Resource Advisor positions include working in rough and remote terrain, limited control flights, and direct engagement on the fireline as a member of a firefighting crew. These specific conditions are described in the Interagency Business Management Handbook and tiered directly to 5 CFR Appendix A to Subpart 1 of Part 550.

Linn Gassaway, Chair, READ SC