



OFFICE OF
INSPECTOR GENERAL
U.S. DEPARTMENT OF THE INTERIOR

The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections

This is a revised version of the report prepared for public release.



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INSPECTOR GENERAL
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Memorandum

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Subject: Final Evaluation Report – *The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections*
Report No. 2022–ER–021

This memorandum transmits our evaluation report on the U.S. Department of the Interior’s wildland fire fleet inspection practices.

We will track open recommendations for implementation. We will notify Congress about our findings, and we will report semiannually, as required by law, on actions you have taken to implement the recommendations and on recommendations that have not been implemented. We will also post a public version of this report on our website.

If you have any questions about this report, please contact me at aie_reports@doioig.gov.

cc: Darryl LaCounte, Director, Bureau of Indian Affairs
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Results in Brief

What We Evaluated

Wildland fire management is a crucial obligation for the U.S. Department of the Interior (DOI). In 2022, nearly 70,000 fires burned roughly 7.6 million acres nationally, 2.1 million acres of which were in the DOI's area of responsibility and cost the agency approximately \$650 million to suppress. Aside from this monetary cost, each year, the DOI also commits significant personnel and equipment resources to combat wildland fires. More specifically, as of September 2023, the DOI employed approximately 4,800 wildland fire personnel and owned approximately 2,000 firefighting vehicles.¹ One basic but effective way to help ensure fleet readiness and protect firefighters is to inspect and review the equipment used to fight wildland fires. We evaluated whether the DOI's wildland firefighting bureaus inspected their wildland fire fleet to ensure readiness.

What We Found

We found that, overall, the DOI's wildland firefighting vehicles were not routinely inspected for mechanical and safety issues in accordance with bureau requirements. We sampled 124 DOI firefighting vehicles from across the four bureaus that have such equipment—the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (FWS), and National Park Service (NPS). We found that the bureaus were missing the most recent annual and daily inspections for, on average, 51 percent and 56 percent of their vehicles, respectively. In addition, 53 percent of the vehicles in our sample did not have evidence to support that a recent preparedness review occurred. These issues were most pronounced at the BIA, FWS, and NPS, where the majority of sampled vehicles did not have a documented annual inspection, did not have a record of daily inspections, and were not part of a recent preparedness review. In fact, only 6 percent of the vehicles sampled at these bureaus had documentation of all three items reviewed. In contrast, the BLM performed better, providing evidence that it completed annual and daily inspections for 86 percent and 81 percent of its vehicles, respectively, and that it conducted and documented preparedness reviews for approximately 74 percent of its vehicles in our sample.

We noted that there are differing inspection and preparedness review practices across bureaus as well as a lack of Departmentwide policy and oversight from the DOI's Office of Wildland Fire, which is responsible for ensuring consistent policy to implement a single, coordinated wildland firefighting program. Furthermore, we noted that the BLM alone uses its Working Capital Fund for vehicle maintenance; officials at the BIA, FWS, and NPS told us that their programs would benefit from implementing a similar process.

¹ We requested from each bureau a listing of all wildland firefighting equipment with a DOI license plate; in this report, we use the terms "vehicle" and "equipment" to refer to all types of wildland fire equipment that meet these criteria.

Why This Matters

The DOI's firefighters rely on wildland firefighting vehicles for their mission and safety; regular and prescribed inspections are critical to provide assurance that these vehicles are ready for emergency response in dangerous environments. Routine inspections help identify maintenance needs before they affect the operation of the vehicle, and maintenance also helps ensure that vehicles and equipment are safe for operators and are available for use. Without routine inspections, the DOI and its partners and stakeholders have no assurance that the DOI is adequately prepared to carry out its mission to combat wildland fire on Federal and Tribal lands.

What We Recommend

We make six recommendations that, if implemented, will improve inspection policy, practices, and program effectiveness to better accomplish the wildland firefighting mission.

Introduction

Objective

The objective of our evaluation was to determine if the U.S. Department of the Interior’s (DOI’s) wildland firefighting bureaus inspected their wildland fire fleet to ensure readiness.

See Appendix 1 for our audit scope and methodology.

Background

The DOI manages more than 535 million acres—consisting of national parks, wildlife refuges and preserves, other public lands, and Tribal lands—that are often situated in vegetated landscapes that are susceptible to wildland fires. According to the National Interagency Coordination Center, burned acreage from wildland fires on DOI-managed land accounted for nearly 28 percent of the 7.6 million acres burned across the United States in calendar year 2022.² Firefighting on DOI land is carried out by approximately 4,800 wildland fire personnel and 2,000 firefighting vehicles housed across four bureaus: the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (FWS), and National Park Service (NPS). For FY 2023, the DOI received approximately \$1.8 billion in appropriated funds for wildland fire management. The Infrastructure Investment and Jobs Act,³ passed in November 2021, also provides nearly \$1.5 billion in supplemental wildland fire management funding through FY 2026.

Federal Coordination

Federal wildland fire response is a tiered coordination system that progresses from local to regional to national coordination as an incident escalates in severity and complexity. At the national level, the DOI and its Federal wildland firefighting partner organizations are co-located at the National Interagency Fire Center (NIFC) in Boise, Idaho. NIFC is home to the National Interagency Coordination Center, which coordinates intelligence and predictive services (e.g., weather forecasting) and dispatches national equipment and supplies, incident management teams, fire crews, and aircraft.

An interagency group—consisting of the DOI’s four firefighting bureaus (the BLM, BIA, FWS, and NPS) and the U.S. Forest Service—develops the *Interagency Standards for Fire and Fire Aviation Operations* (commonly referred to as the Red Book), which sets forth agency-specific guidance regarding wildland fire program management.

² This information is derived from National Interagency Coordination Center data on calendar year acreage and cost of fighting wildland fire at <https://www.nifc.gov/fire-information/statistics/suppression-costs>.

³ The Infrastructure Investment and Jobs Act, Pub. L. No. 117–58, 135 Stat. 429 (2021).

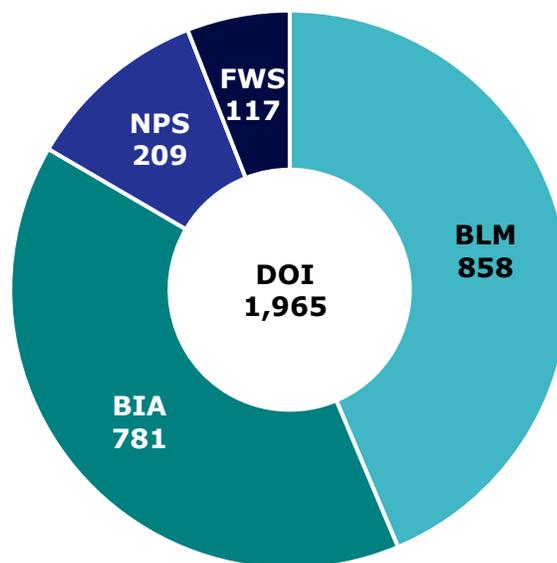
DOI-Specific Coordination

The Office of Wildland Fire (OWF) is responsible for overseeing the DOI’s wildland firefighting efforts—specifically, providing program oversight, policy and planning, finance and budget operations, IT enterprise services, coordination and collaboration, and all-hazard response. The OWF’s mission is established in 112 *Departmental Manual (DM)* 7:

The mission of the OWF is to coordinate wildland fire management programs within the Department and with other Federal and non-Federal partners. The OWF establishes legally and scientifically based Department-wide wildland fire policies and budgets, and provides strategic leadership and oversight that promotes safe, comprehensive, cohesive, efficient, and effective national wildland fire programs, consistent with each bureau’s statutory authorities and constraints.⁴

In addition to the OWF’s role, the BLM, BIA, FWS, and NPS commit resources toward fighting wildland fires. As of 2023, the bureaus reported owning 1,965 wildland fire vehicles contributing to this effort (see Figure 1).⁵

Figure 1: DOI-Owned Wildland Firefighting Vehicles by Bureau



Because of the varied terrain types, sometimes extreme operating conditions, and unique mission needs, the vehicles used to fight wildland fires can look quite different from those used to fight more traditional structure fires. As such, wildland firefighting vehicles include not only fire engines (which can range from pickup trucks with small water tanks on the back to large trucks that can carry thousands of gallons of water), but also command and support vehicles, crew transports, bulldozers, water tenders (specialized vehicles capable of bringing water, foam, or dry chemicals to the fire), and excavators. Fire engines and water tenders are classified into

⁴ 112 *DM* 7.2.

⁵ Bureaus provided a listing of 1,965 wildland fire vehicles with DOI license plates in response to our data request. The listing included command and support vehicles, crew carriers, dozers, water tenders, excavators, and wildland fire engines.

different types depending upon how many gallons of water they hold and the gallons per minute the pumps can produce (see Figure 2).

Figure 2: A BLM Water Tender (Left) and Type 6 Fire Engine (Right)



Source: NIFC (<https://www.flickr.com/photos/nifc/52149599036/in/album-72177720299827382/>).

Requirements for Wildland Fire Vehicle Inspections

While the OWF’s mission is to provide Departmentwide wildland fire policy, the Red Book chapters relevant to the DOI are developed and enforced by the individual bureaus. As a member of the developing committee, the OWF provides input and feedback, but the Red Book is primarily an operational policy developed by the bureaus. These bureau-specific chapters include wildland fire vehicle inspection policies, which aim to ensure that fleet readiness and vehicle safety requirements are met. According to the Red Book, preventative maintenance checks, regular servicing, prompt repairs, and end-of-service replacement are critical to mission readiness, performance, and safe operation.⁶

Wildland firefighting vehicles at the DOI are inspected at different intervals depending on bureau policy and primarily focus on two types of inspections: annual and daily. Annual inspections, required by the BIA, BLM, and NPS, cover basic safety and mechanical functions, including checking brake pads and lines, replenishing fluid levels, and gauging whether sufficient tire tread remains for safe vehicle operation. The BIA, BLM, and NPS also require daily inspections, and a record of these inspections is kept with each vehicle. While the BIA does not specify a format, daily inspections for the BLM and NPS wildland fire vehicles are required to follow a BLM-developed recordkeeping form, which is also to be kept with the vehicle. This document contains detailed vehicle data, a preventative maintenance checklist, and a lifetime

⁶ Red Book, Chapter 3, “Vehicle Maintenance, Repairs and Replacement.”

equipment repair record. The FWS policy in the Red Book is silent on both annual and daily inspections (in that it does not provide requirements for these inspections).

In addition, all four bureaus require preparedness reviews to be conducted annually or at management’s discretion. Preparedness reviews assess fire programs for compliance with established fire policies and procedures set forth in the Red Book, which include assessing equipment readiness and safety, identifying any equipment deficiencies, and recommending corrective action. See Figure 3 for a breakdown of requirements by bureau.

Figure 3: Red Book Requirements for Bureau-Specific Inspection and Preparedness Reviews

Bureau	Annual Inspections	Daily Inspections	Preparedness Reviews
BIA	Required	Required	Periodic ⁷
BLM	Required ⁸	Required	Annual
FWS	Silent ⁹	Silent	Annual
NPS	Required	Required	Annual

Funding for Wildland Fire Management Programs

As previously described, the OWF is responsible for overseeing the DOI’s wildland firefighting efforts, including individual bureaus’ finance and budget operations. The OWF coordinates the distribution of funding to the four bureaus through an allocation process based on a variety of factors, including historical data, seasonal information, and spending plans, which are specific to each budget category. The DOI’s overall wildland fire funding is divided into four categories, three of which can be used for vehicles and related inspections and are therefore pertinent to our review (see Figure 4).¹⁰ The bureaus use these funding categories, to varying degrees, to conduct wildland fire vehicle inspections and complete maintenance work or replace vehicles, as needed.

⁷ The BIA’s chapter in the Red Book requires “regularly scheduled” regional office fire preparedness reviews with a target of conducting 2 reviews per year, meaning that each of the BIA’s 12 regions should be reviewed every 6 years.

⁸ The BLM’s chapter of the Red Book refers to items that should be included in annual inspections but does not explicitly require those annual inspections.

⁹ Although the FWS’ chapter of the Red Book is silent on annual inspections, 322 *FW* 2.18(B)(1) requires annual inspections for heavy-duty equipment.

¹⁰ The fourth category, titled “Other Operations,” includes funding for burned area rehabilitation, facilities construction and maintenance, and the Joint Fire Science Program.

Figure 4: Applicable DOI FY 2023 Wildland Fire Funding by Category¹¹

Category	Use	FY 2023 Amount (\$)
Fuels management	Used for activities such as prescribed burns.	403 million
Suppression	Used to fight wildland fires.	459 million
Preparedness	Used to maintain wildland fire vehicles, train personnel, manage infrastructure, and hire seasonal firefighters.	469 million

¹¹ We note that, in its technical comments to a draft of this report, OWF expressed disagreement with the funding amounts identified in Figure 4. OWF did not, however, provide support for, and we did not verify, the figures included in OWF's technical comments. We included OWF's full response in Appendix 3. We derived all financial information from a February 2023 Congressional Research Service report addressing these issues in detail. See Cong. Rsch. Serv., *Funding for Wildfire Management: FY2023 Appropriations for Forest Service and Department of the Interior* (February 28, 2023), <https://crsreports.congress.gov/product/pdf/IF/IF12142>. According to this report, the FY 2023 amounts in this figure reflect appropriations provided in the Infrastructure Investment and Jobs Act (Pub. L. No. 117-58) and the Disaster Relief Supplemental Appropriations Act, 2023 (Pub. L. No 117-328, 136 Stat. 5201-5226).

Results of Evaluation

We found that the DOI must improve its wildland fire fleet management to ensure readiness across bureaus and locations. We reviewed 124 DOI wildland firefighting vehicles¹² and found that, on average, the bureaus were missing the most recent annual and daily inspections for 51 percent and 56 percent of their vehicles, respectively (see Appendix 2). In addition, 53 percent of the vehicles in our sample did not have evidence to support that a recent preparedness review occurred. The lack of inspection and review documentation raises concerns about the bureaus' ability to ensure wildland fire fleet response readiness as well as attendant risks to the safety of firefighters and the general public. The lack of inspections and review documentation also raises concerns regarding the DOI's ability to effectively address the increasingly severe wildland fires on Federal lands.

The DOI Did Not Ensure Wildland Firefighting Vehicles Were Inspected

As previously summarized, the OWF's mission is to provide Departmentwide wildland fire policy. In practice, however, the OWF largely defers to the bureaus on operational matters, including inspection requirements. The BLM, BIA, FWS, and NPS each have a chapter within the Red Book detailing bureau-specific, internally developed inspection requirements. These include annual inspection requirements; daily inspection requirements; and, depending on the bureau, annual or periodic preparedness reviews:

- **Annual inspections**¹³ involve a review of the vehicle's basic mechanical and safety features such as brakes, fluids, and tires.
- **Daily inspections**¹⁴ are designed to supplement the vehicle owner's manual to identify maintenance issues and keep equipment ready to be dispatched.
- **Preparedness reviews**¹⁵ assess the wildland fire unit's overall compliance with established fire policies and procedures.

See Figure 3 in the "Background" section for each bureau's Red Book inspection requirements.

¹² Some vehicles were not in service during the inspection period, such as a vehicles acquired too recently to require the type of inspection or review; these have been excluded from calculations.

¹³ Annual inspections are prepared using DOI Form 1520-35, which is the same form used for general fleet vehicles such as sedans. For an example form, see https://www.nifc.gov/sites/default/files/blm/training/1520_35.pdf.

¹⁴ For daily inspections, the BLM and the NPS use the BLM's daily recordkeeping document, the Fire Engine Maintenance Procedure and Record, which is a structured form for inspecting fire equipment that contains detailed vehicle information and history and is kept with the vehicle. BIA and FWS policies do not mention the document.

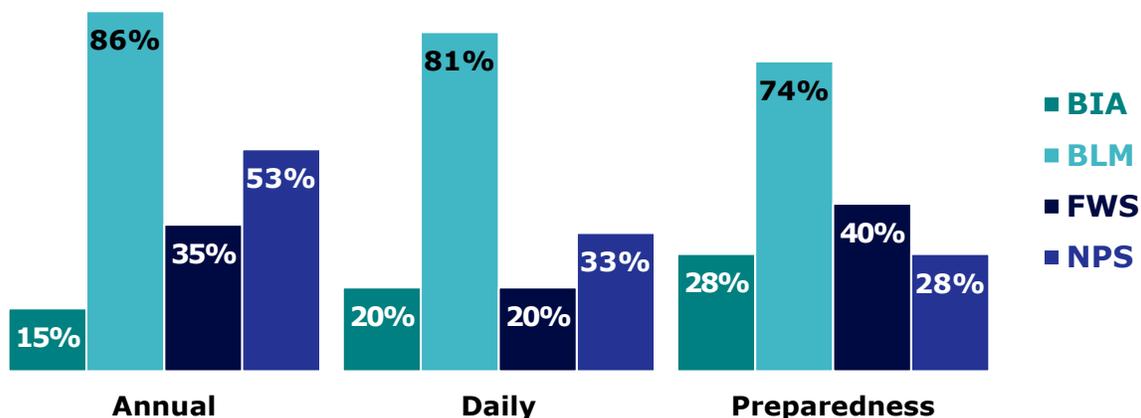
¹⁵ Preparedness reviews are described in Chapter 18 of the Red Book and follow standard checklists provided by NIFC to assess compliance with established fire policies and procedures.

We found that, collectively, the DOI did not ensure that the wildland firefighting vehicles it owns¹⁶ were routinely inspected. We reviewed documentation for 124 DOI-owned wildland firefighting vehicles and found that the bureaus were missing the most recent annual and daily inspections for, on average,¹⁷ 51 percent and 56 percent of their vehicles, respectively. For example, we found that, notwithstanding the requirement for annual reviews of this type, an NPS command vehicle, which is used to coordinate firefighting efforts, did not have an annual inspection or preparedness review for the prior year. We also received responses from the BIA and FWS in which officials stated that five of the sampled vehicles were not fully operable and thus had not been inspected. In addition, 53 percent of the vehicles in our sample did not have evidence to support that a recent preparedness review occurred (see Appendix 2).

The majority of sampled vehicles from three bureaus—the BIA, FWS, and NPS—did not have a documented annual inspection, did not have a record of daily inspections, and were not part of a recent preparedness review. In fact, approximately 96 percent of the vehicles sampled from these three bureaus were not in compliance with at least one of the three inspection or review standards tested. For instance, in response to our request for records for a fire engine in New Mexico, BIA personnel told us that they rely on monthly operations tracking¹⁸ and do not complete annual inspections for wildland fire engines. They also could not provide us with records of daily inspections and told us they had not completed a preparedness review in recent years.

Although room for improvement remains, the BLM performed markedly better, as it provided evidence of completed annual and daily inspections for 86 percent and 81 percent of its vehicles, respectively. The BLM also conducted and documented preparedness reviews for approximately 74 percent of its vehicles in our sample. Figure 5 shows the percentage of completed inspections and reviews at each bureau.

Figure 5: Percentage of Completed Inspections and Reviews by Bureau



¹⁶ Wildland firefighting vehicles with DOI license plates as identified by the bureaus.

¹⁷ For each type of inspection and review, we added the number of vehicles with complete and incomplete inspections or reviews together and divided that by the total number of vehicles in service during the scope of our evaluation. We excluded from the calculation vehicles that were not in service during our scope and would not be expected to have certain inspections or reviews.

¹⁸ Monthly operations tracking includes mileage, usage, and maintenance that occurred but does not include an annual inspection.

Lacking OWF Oversight

These issues occurred, in part, because the OWF did not conduct oversight of the inspection process to ensure the bureaus completed inspections of wildland fire vehicles as required. The OWF is responsible for overseeing the DOI's wildland firefighting program—in particular, providing strategic leadership and oversight that promotes safe, comprehensive, cohesive, efficient, and effective national wildland fire programs consistent with each bureau's statutory authorities and constraints. Although part of the OWF's mission is to establish Departmentwide wildland fire policies, the OWF largely defers to the bureaus on operational matters. While each bureau has unique statutory and mission requirements that may hinder the OWF's ability to standardize broader programmatic policy, vehicle inspections are a basic safety step to ensure fleet readiness and protect personnel using this equipment. The OWF's reliance on the bureaus to self-manage vehicle inspection policy development and enforcement has created a decentralized, inconsistent approach to wildland firefighting vehicle inspection practices for the DOI. This approach has created an environment that allows for variations in inspection and preparedness review requirements.

Inconsistent Inspection and Preparedness Review Policies

In addition, lack of inspections occurred, in part, because inspection policy development and implementation has been left to the individual bureaus.¹⁹ As discussed in the "Background" section, inspection policy in the Red Book varies by bureau. Although we recognize that each bureau has unique statutory and mission requirements, wildland fire vehicle inspections are an important measure taken not only to ensure fleet readiness but also to protect personnel using this equipment; the need for basic safety is not unique to a single bureau's mission.

In particular, the BIA, BLM, and NPS require annual and daily inspections; however, the BIA does not require annual preparedness reviews. Practices within each bureau can also fluctuate based on location. For example, a Regional Fire Specialist for three NPS regions stated that parks, groups, and regions within the NPS have "inconsistency within [their] business practices specific to how [they] track, document, and maintain vehicle utilization, inspections, and maintenance records (i.e., [Fire Engine Maintenance Procedure and Record], annual inspection, command vehicle vs. engine, etc)."

Preparedness reviews, typically conducted at the operating unit level, serve as the primary check to ensure that vehicles have been inspected according to policy and are ready for wildland fire assignments. Specifically, preparedness reviews are intended to "identify organizational, operational, procedural, personnel, or equipment deficiencies, and recommend specific corrective actions";²⁰ assess compliance with established policies and procedures; and provide management with a comprehensive picture of a unit's readiness. The BLM provided evidence of a preparedness review for 74 percent of the vehicles sampled and the other three bureaus provided evidence of reviews for only 28 to 40 percent of the vehicles sampled (see Figure 5 above).

¹⁹ Under 112 *DM* 7.3(B)(1), the OWF is responsible for "[i]nterpreting, developing, amending, and issuing Department-wide wildland fire management policies including directives, guidance, strategies, and plans consistent with bureau statutory authorities and constraints."

²⁰ Red Book, Chapter 18, "Reviews and Investigations."

Other Matters

Differing Vehicle Maintenance Funding Practices

The DOI's four wildland firefighting bureaus differ extensively in how they fund vehicle maintenance, in part due to the BLM's differing legislative framework. In particular, the Federal Land Policy and Management Act of 1976 established the BLM's Working Capital Fund (WCF), which is available to supply and equip BLM programs. For its wildland fire program, the BLM uses the WCF for vehicle maintenance by setting aside a portion of funding for each vehicle based on actual usage, known as the "use rate." This creates a dedicated funding source that is then used for fuel and maintenance needs throughout the life of the vehicle and is applied to the function for which the vehicle is actually used. For example, when a vehicle is used on suppression or fuels management activities, those funding streams are charged based on the vehicle's usage and the amount is placed in the WCF for future maintenance.

Conversely, the BIA, FWS, and NPS do not have a mechanism to set aside funding in the WCF based on the usage of the vehicle, as they were not explicitly included in the Federal Land Policy and Management Act of 1976. Rather, the other bureaus operate reactively, paying for vehicle maintenance out of their respective single-year preparedness allocation as needs arise and when funding is available. This approach leaves vehicle maintenance to compete with other fire preparedness activities such as training and seasonal hiring. Consequently, when unscheduled or unanticipated maintenance costs arise, these bureaus may face difficult budgeting decisions. FWS wildland fire specialists provided examples of vehicle maintenance costs that directly affected their ability to hire seasonal fire employees. Further, an NPS Equipment and Facilities Program Manager highlighted that firefighter training and vehicle maintenance often compete for the same funding.

Similarly, the BIA Director of Wildland Fire Operations stated that at current funding levels, the BIA does not have adequate funding to maintain a safe and up-to-date fleet of wildland fire vehicles. As already described, our review of sampled BIA vehicle inspection documentation confirmed the lack of consistent inspections. For instance, BIA inspection documentation identified one vehicle that had been inoperable for 7 years. The documentation also revealed vehicles that were insufficiently maintained and therefore were not eligible for dispatch to other wildland firefighting agencies.

Fire directors at the BIA, FWS, and NPS stated their programs would benefit from the implementation of a model similar to what the BLM uses for wildland firefighting vehicle maintenance. As part of the OWF's oversight role, it may be beneficial for it to seek additional information to enable it to assess whether the DOI's wildland fire fleet would benefit from a more standardized approach to vehicle maintenance funding that, for example, might be analogous to the BLM's method.

Conclusion and Recommendations

Conclusion

Responding to wildland fires presents substantial dangers to firefighter lives and safety, and the DOI's firefighters must be able to trust that the equipment they are assigned meets mechanical and safety standards. Overall, the DOI's wildland firefighting vehicles were not routinely inspected for mechanical and safety issues in accordance with bureau requirements. The OWF did not consistently ensure the DOI's bureaus inspected the wildland firefighting fleet, which is a key step in making sure vehicles are maintained and ready to respond to wildfires. We reviewed 124 DOI-owned wildland firefighting vehicles and found that 51 percent of the vehicles sampled did not have a recent annual inspection, 56 percent did not have a record of daily inspections, and 53 percent did not have a recent preparedness review. Lack of OWF oversight of wildland fire vehicle inspections and inconsistent bureau inspection and preparedness review policy both contributed to the differences highlighted among the bureaus.

Routine inspections are a basic, first-line check on the mechanical and safety readiness of any vehicle. If equipment is not routinely inspected, maintenance issues may not be discovered. Vehicles that are sidelined due to maintenance issues are not only a risk to wildland fire response, but they also represent a risk to fleet readiness. Readiness is critical to safeguarding the public's investment of taxpayer dollars in wildland fire vehicles and ensuring the DOI fulfills its public safety mission. Differing levels of readiness and maintenance could also lead to an increase in resource requests at either the regional or national level, which would require prioritization decisions that may result in cases where requests go unfulfilled. This could affect the DOI's ability to achieve its fire management objectives and protect its firefighters, equipment, and public lands.

Recommendations

We provided a draft of this report to the OWF, BIA, BLM, FWS, and NPS for review. We received full concurrence. The OWF concurred with two recommendations, and the BIA, BLM, FWS, and NPS each concurred with the respective bureau-specific recommendations. We consider all recommendations resolved. We note that the OWF in particular acknowledged the significance of these issues and provided its perspective on both the benefits of a centralized interagency wildfire response through NIFC as well as the potential risks that can occur through the development of bureau-specific policies for implementation. It emphasized its intent to take "appropriate steps to support the Bureaus in instituting standardized and comprehensive policy and oversight plans for vehicle inspections and reviews."

Below we summarize the responses to our recommendations, as well as our comments on the responses. See Appendix 3 for the full text of all responses received; Appendix 4 lists the status of each recommendation. The OWF's response also provided technical comments and proposed modifying certain language in the draft report. We clarified some passages to address these comments, but we did not modify our overall findings and recommendations.

We recommend that the Office of Wildland Fire:

1. Develop and ensure implementation of a Departmentwide policy to standardize inspection and preparedness review requirements for wildland fire vehicles, which should include, at a minimum, inspection intervals and documentation requirements.

OWF Response: The OWF concurred with the recommendation and stated that it will develop a Departmentwide policy that establishes a standard approach to ensure that all wildland fire management vehicles are routinely inspected and that there are sufficient documentation requirements. In a followup email, the OWF provided a May 1, 2024 target implementation date.

OIG Comment: Based on the OWF response and proposed actions, we consider this recommendation resolved. It will be implemented when the OWF provides documentation demonstrating that it has created the Departmentwide policy on wildland fire vehicle inspections, preparedness reviews, and documentation requirements.

2. Develop and implement a Departmentwide oversight plan, including compliance monitoring and specific corrective actions, to ensure vehicle inspections are completed in accordance with the policy created in Recommendation 1.

OWF Response: The OWF concurred with the recommendation and stated that it “will develop and implement a reporting and compliance plan so that corrective actions can be taken in the event that program deficiencies are identified and immediately addressed.” In a followup email, the OWF provided a May 1, 2024 target implementation date.

OIG Comment: Based on the OWF response and proposed actions, we consider this recommendation resolved. It will be implemented when the OWF provides documentation demonstrating that it has developed and implemented an oversight plan to ensure vehicle inspections are completed in accordance with its newly established inspection policy.

Additionally, in an effort to ensure fleet readiness, we have identified the following recommendations for more immediate action by the bureaus:

3. We recommend that the BIA conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

BIA Response: The BIA concurred with the recommendation and acknowledged the Red Book standards generally governing inspection activities. The BIA stated that it:

plans to review current inspection activities to ensure personnel will complete, monitor, report, and document annual safety inspections, regularly scheduled preventative maintenance, and daily (or pre-trip) inspections for all BIA wildland fire vehicles. Annual safety inspections must be documented on Form 1520-35 or designated local form. Regularly

scheduled preventative maintenance, unscheduled maintenance, and repairs for DOI-29 owned (I-plate) vehicles are to be recorded in FBMS. Daily inspections must be kept with the vehicle records for the life of that vehicle. . . .

BIA will provide training to Regional and Agency level personnel on the implementation of thorough annual readiness reviews. Training will also be provided on all preparedness review checklists to improve review performance and monitoring and enforcement of requirements will be performed to correct the deficiencies.

The BIA provided a December 31, 2024 target implementation date.

In addition, the BIA stated its “Wildland Fire Management has implemented the use of the Wildland Fire Management Readiness Policy.” It further stated that, in June 2022, it implemented new checklists that require a “more extensive review process for all units” and “the development of corrective action plans for deficiencies.” The BIA also stated it intends to train all Engine Operator and Engine Boss positions on the safe, proficient operation of Fire Engines and that it has trained 420 students to date.

OIG Comment: Based on the BIA response and proposed actions, we consider this recommendation resolved. However, we encourage the BIA to complete vehicle inspection and preparedness reviews as soon as possible to help ensure the safety of wildland fire vehicles and personnel. We also note that the various efforts described in response to this recommendation are commendable, but a number do not speak directly to the vehicle inspection process itself, which is the focus of this report. This recommendation will be implemented when the BIA provides documentation demonstrating that it completed inspections and preparedness reviews for all active wildland fire vehicles.

4. We recommend that the BLM conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

BLM Response: The BLM concurred with the recommendation and stated that wildland firefighting vehicles are inspected as part of annual wildland fire preparedness reviews. It noted, “Factors that may have contributed to the lack of documented annual vehicle inspections for sampled vehicles include: Annual inspection/service had not yet been completed at the time of the data request. Some vehicles may have not been present during preparedness reviews due to wildfire activity or repair work.” The BLM also stated its Fire and Aviation Directorate “will place increased emphasis on reviewing fire equipment and associated documents during all scheduled Fiscal Year 2024 national preparedness reviews.” Finally, the BLM stated it “will update current processes to achieve full compliance with current BLM policy to inspect every fire vehicle at the appropriate intervals.” The BLM provided a June 30, 2024 target implementation date.

OIG Comment: Based on the BLM response and proposed actions, we consider this recommendation resolved. It will be implemented when the BLM provides documentation demonstrating that it completed inspections and preparedness reviews for all active wildland fire vehicles.

5. We recommend that the FWS conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

FWS Response: The FWS concurred with the recommendation and stated its Fire Management Branch will “develop interim guidance on the performance and documentation of daily inspections” and will “perform an annual inspection of all fire fleet within 60 days of issuance of the final OIG report.” The FWS provided a December 31, 2024 target implementation date. In a followup email, the FWS stated it would begin the annual preparedness review process on January 1, 2025.

OIG Comment: Based on the FWS response and proposed actions, we consider this recommendation resolved. However, we encourage the FWS to complete vehicle inspection and preparedness reviews as soon as possible to help ensure the safety of wildland fire vehicles and personnel. This recommendation will be implemented when the FWS provides documentation demonstrating that it completed inspections and preparedness reviews for all active wildland fire vehicles.

6. We recommend that the NPS conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

NPS Response: The NPS concurred with this recommendation and stated it:

recognizes the recommendation to conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy. Multiple factors may have contributed to these issues including workforce challenges and competing priorities. The NPS, by policy and standard, requires completed and documented annual safety inspections and preventative maintenance inspections for all NPS wildland fire vehicles. The NPS Division of Fire and Aviation will place increased emphasis, in coordination with regional directors, on reviewing fire equipment and associated documentation during scheduled 2024 preparedness reviews with a target date of June 30, 2024. The NPS Branch of Wildland Fire will also reiterate the 2023 Interagency Standards for Fire and Fire Aviation Operations, Chapter 3 – NPS Program Organization and Responsibilities for annual and daily vehicle inspections. Additionally, NPS is actively investigating potential methods to enhance documentation of vehicle inspections and policy compliance through centralized electronic means.

The NPS provided a November 16, 2024 target implementation date.

OIG Comment: Based on the NPS response and proposed actions, we consider this recommendation resolved. However, we also note that the NPS response lacks specificity on planned actions to address the recommendation to inspect and complete preparedness reviews for all wildland fire vehicles. We encourage the NPS to complete vehicle inspection and preparedness reviews as soon as possible to help ensure the safety of wildland fire vehicles and personnel. This recommendation will be implemented when the NPS provides documentation demonstrating that it completed inspections and preparedness reviews for all active wildland fire vehicles.

Appendix 1: Scope and Methodology

Scope

We sought to determine if the U.S. Department of the Interior's (DOI's) wildland firefighting bureaus—the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (FWS), and National Park Service (NPS)—and the Office of Wildland Fire (OWF) inspected their wildland fire fleet to ensure readiness. We conducted our fieldwork from May 2022 through April 2023. We relied on policy, guidance, and data provided by the DOI and its bureaus. We did not evaluate bureau claims regarding the sufficiency of funding levels for wildland fire programs.

We conducted our evaluation in accordance with the *Quality Standards for Inspection and Evaluation* as put forth by the Council of the Inspectors General on Integrity and Efficiency. We believe that the work performed provides a reasonable basis for our conclusion and recommendations.

Methodology

To accomplish our objective, we:

- Obtained and reviewed laws, regulations, policies, and guidance related to wildland fire vehicle inspections and maintenance from the BIA, BLM, FWS, NPS, and OWF.
- Obtained and reviewed laws, regulations, policies, and guidance related to funding the lifecycle replacement and maintenance of wildland fire vehicles.
- Interviewed BIA, BLM, FWS, NPS, and OWF wildland fire personnel.
- Interviewed Office of the Solicitor personnel.
- Obtained the universe of all DOI-owned (I-plated) wildland firefighting vehicles from each of the four bureaus.
- Coordinated with our Data Analytics Unit to select a stratified random sample of 124 of 1,965 DOI-owned wildland firefighting vehicles across the 4 bureaus.
- Requested and reviewed records of annual inspections, daily inspections, and preparedness reviews for sampled vehicles.
- Calculated the average number of vehicles with evidence of complete or incomplete inspections and reviews for each bureau. For each type of inspection and review, we added the number of vehicles with complete or incomplete inspections or reviews together and divided that by the total number of vehicles in service during the scope of our evaluation. We excluded from the calculation vehicles that were not in service during our scope and would not be expected to have certain inspections or reviews.

Appendix 2: Sampled Vehicle Results

Bureau of Indian Affairs Inspection and Preparedness Review Results²¹

License Plate	Annual Inspection	Daily Inspection	Preparedness Review
I456543	Not Applicable		Not Applicable
I454986			
I453102		✓	
I453352	✓	✓	
I455893			✓
I455098			
I452182			
I454204	✓		✓
I455849		✓	✓
I455811	✓	✓	
I456192		✓	✓
I450243			
I453108			
I454788			
I453907			
I454310		✓	✓
I455094	✓		✓
I453820			✓
I455046			
I455243			
I452542			
I455805			
I455814			✓

²¹ Areas marked “Not Applicable” indicate that vehicles were not in service during the inspection period (such vehicles acquired too recently to require the type of inspection or review); these vehicles have been excluded from calculations. Areas marked with a ✓ indicate that bureaus provided documentation showing the inspection or review was completed, and blanks indicate that documentation was not provided.

License Plate	Annual Inspection	Daily Inspection	Preparedness Review
I454628			
I454773			
I455992	✓		
I454155			
I455881			
I455068			
I454727			
I455212	✓		✓
I455620			
I455833			
I450126		✓	✓
I454989			✓
I453894			
I454616			
I454806			
I455321			
I452755		✓	

Bureau of Land Management Inspection and Preparedness Review Results

License Plate	Annual Inspection	Daily Inspection	Preparedness Review
I623928	✓	✓	✓
I623288	✓	✓	✓
I623285	✓	✓	✓
I624368			
I624008	✓	✓	✓
I622517	✓	✓	✓
I623616			
I621512	✓	✓	✓
I622855	✓		

License Plate	Annual Inspection	Daily Inspection	Preparedness Review
I623622	Not Applicable	✓	✓
I622160	✓		
I623787	✓		
I624293	✓	✓	
I623151	✓		
I49009T	✓	✓	
I622320	✓	✓	✓
I621871		✓	✓
I621037	✓	✓	✓
I424958	✓	✓	✓
I424961	✓	✓	✓
I621080	✓	✓	✓
I621115	✓	✓	✓
I622182		✓	✓
I622577	✓		
I624159	Not Applicable	Not Applicable	Not Applicable
I00195E	✓	✓	✓
I621952		✓	✓
I622707	✓	✓	✓
I000798T	✓	✓	✓
I621953	✓	✓	✓
I620741	✓	✓	✓
I622704	✓		✓
I429441	✓	✓	✓
I621959	✓	✓	✓
I623863	✓	✓	✓
I429443	✓	✓	
I623481	✓	✓	✓
I621505	✓	✓	✓

License Plate	Annual Inspection	Daily Inspection	Preparedness Review
I622159	✓	✓	✓
I429633	✓	✓	
I621880	✓	✓	✓
I623053	✓	✓	✓
I622727		✓	✓
I620380	✓	✓	✓

U.S. Fish and Wildlife Service Inspection and Preparedness Review Results

License Plate	Annual Inspection	Daily Inspection	Preparedness Review
I582689	✓	✓	✓
I489026			
I486696			
I481150			
I486946			
I481304			✓
I487538	✓	✓	✓
I487023			
I583511			✓
I584867	✓	✓	
I584875	✓		✓
I481198			✓
I487313			
I582225			
I481433			
I481579	✓		✓
I480552			
I582914	✓	✓	
I489002			✓
I489760	✓		

National Park Service Inspection and Preparedness Review Results

License Plate	Annual Inspection	Daily Inspection	Preparedness Review
I413610			
I413805	✓		
I414045	✓	✓	
I414068			✓
I414070	✓		
I414081	✓		✓
I512475	Not Applicable	Not Applicable	Not Applicable
I512476	✓	✓	
I516444	✓	✓	✓
I516460	✓	✓	
I518847			
I519026			
I519044			
I519199	✓		✓
I519200	Not Applicable	Not Applicable	Not Applicable
I519570			✓
I519599			
I610569	Not Applicable	✓	
I610571	Not Applicable	✓	
I610577	Not Applicable		

Appendix 3: Responses to Draft Report

The responses to our draft report from the Office of Wildland Fire, the Bureau of Indian Affairs, the Bureau of Land Management, the U.S. Fish and Wildlife Service, and the National Park Service follow on page 24.



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, DC 20240

To: Kathleen Sedney, Assistant Inspector General for Audits, Inspections, and Evaluations

From: Jeffery Rupert, Director - Office of Wildland Fire

Subject: Office of Inspector General Draft Evaluation Report—*The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections* Report No. 2022-ER-021

JEFFERY
RUPERT

Digitally signed by
JEFFERY RUPERT
Date: 2024.01.11 17:35:26
-05'00'

Thank you for your Draft Report, *The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections*, dated December 11, 2023. The Office of Wildland Fire (OWF) concurs with the report recommendations and will take immediate actions to address the policy deficiencies that were identified in the report conclusions.

Background

Firefighter and public safety are paramount in all wildland fire operations and actions. Wildland fire management vehicles are crucial to ensuring that the Department of the Interior (Department, Interior) has the resources that it needs for wildfire response, wildfire risk reduction efforts, and the restoration and rehabilitation of lands impacted by wildfire. Vehicle inspections are an important step in making sure that these activities are accomplished in an effective manner without jeopardizing the safety of employees.

The “Interagency Standards for Fire and Fire Aviation Operations,” commonly referred to as the “Redbook,” provides interagency guidance for all wildland fire operations, including bureau specific guidance for wildland fire management vehicle inspections. Historically, OWF has relied on the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), U.S. Fish and Wildlife Service (USFWS), and National Park Service (NPS) to implement wildfire operations policy. The centralized nature of interagency wildfire response at the National Interagency Fire Center has been conducive to this management approach. Additionally, operational expertise resides with the Bureaus, who are also responsible for staffing and directly executing wildfire response activities.

For some Bureaus, the Redbook contains guidance for wildland fire management vehicles that tiers to specific bureau policies. Because these policies are developed independently of OWF, inspection processes, requirements, and oversight may be structured differently in some instances. As identified in the draft report, this approach can potentially result in issues associated with response readiness and general safety. In response to the recommendations in the draft report, OWF will take the appropriate steps to support the Bureaus in instituting standardized and comprehensive policy and oversight plans for vehicle inspections and

reviews.

Response to Recommendations

OWF is responsible for wildland fire management program oversight and for developing consistent and coordinated Department-wide policy for all aspects of the Wildland Fire Management program, including wildfire suppression. It is also responsible for ensuring proper policy implementation and compliance, among other programmatic activities. These responsibilities are set forth in Department Manual Part 112, Chapter 7, Office of Wildland Fire.

OWF concurs with and will take immediate steps to address both recommendations 1 and 2 in the draft report:

Recommendation 1. Develop and ensure implementation of a Departmentwide policy to standardize inspection and preparedness review requirements for wildland fire vehicles, which should include, at a minimum, inspection intervals and documentation requirements.

In conformance with OWF responsibilities set forth in Department Manual Part 112, Chapter 7.3.B.(1), in coordination with the Bureaus, OWF will develop a Department-wide policy that establishes a standardized approach to ensure that all wildland fire management vehicles are routinely inspected to guarantee their road worthiness, meet appropriate safety requirements to maintain their availability for use, and that there is sufficient documentation requirements.

Recommendation 2. Develop and implement a Departmentwide oversight plan, including compliance monitoring and specific corrective actions, to ensure vehicle inspections are completed in accordance with the policy created in Recommendation 1.

As stated in our response to Recommendation 1, in conformance with OWF responsibilities set forth in Department Manual Part 112, Chapter 7.3.B., in coordination with the bureaus OWF will develop and issue policy guidance that improves Interior's business practices by standardizing routine and annual vehicle inspections and preparedness reviews across all Bureaus. As a component of any policy oversight plan, OWF will develop and implement a reporting and compliance plan so that corrective actions can be taken in the event that program deficiencies are identified and immediately addressed.

Additionally, OWF will work with the bureaus to consider whether the Department's wildland fire fleet would benefit from a more standardized funding approach among the Bureaus to address vehicle maintenance needs. This assessment will include consideration of whether BLM's approach would be useful for the other Bureaus to adopt and any attendant barriers or drawbacks to it, as well as consider other potential approaches to funding vehicle maintenance.

Technical Comments

OWF recommends the following technical edits to the draft report:

- Change the title of the report to “The U.S. Department of the Interior Should Increase Oversight and Monitoring of Routine Inspections of Wildland Firefighting Vehicles” to accurately reflect the nature of the report.
- Page 1, “What We Evaluated.” Suppression costs in 2022 totaled \$649,743,000, so \$650 million is more accurate if rounding up. Additionally, the fire data referenced in this section and on page 3 in the “Background” are calendar year data, rather than fiscal year. A reference should be added to clarify that this data comes from the National Interagency Coordination Center.
- Page 5, “Requirements for Wildland Fire Vehicle Inspections.” The footnote referencing Chapter 3 of the Redbook applies only to the NPS. Chapter 6 includes similar guidance for the BIA. Alternatively, Chapter 7 includes a section on interagency guidance for driving standards and management controls to mitigate vehicle risks.
- Page 6, “Funding for Wildland Fire Management Programs.” Departmental funding is divided into four program activities even though the Bureaus may only use three programs to fund vehicles and related inspection and maintenance work. The four program activities are Preparedness, Suppression Operations, Fuels Management, and Other Operations. Three sub-activities comprise the Other Operations activity: Burned Area Rehabilitation, Facilities Construction and Maintenance, and the Joint Fire Science Program.
- Page 6, Figure 4. OWF recommends including footnotes with the FY 2023 amounts to identify the source of the funds. For example, both the Suppression and Preparedness amounts include base appropriated funding and Disaster Relief funding; however, the total Preparedness amount is \$427 million (\$382 million of base funding and \$45 million of Disaster Relief funding). Additionally, the total Fuels Management funding is \$247 million. None of these amounts include Bipartisan Infrastructure Law funding.
- Page 9, “Lacking OWF Oversight.” OWF recommends changing “efforts” to “program” to clarify that OWF is responsible for program management, policy and oversight rather than day-to-day wildfire response and operations, which is carried out by the bureaus.

OWF is available to work with the OIG and coordinate edits on the specific suggestions above, if the OIG agrees to make these changes.

Conclusion

Thank you again for the opportunity to provide feedback on the draft report. OWF agrees with the report’s recommendations and will take action to address the noted concerns. As discussed, wildfire operations and response activities are primarily carried out by the bureaus. Nevertheless, OWF recognizes the important role that it plays to ensure that wildland fire management policy across Interior is purposeful, consistent, and standardized (where appropriate) and that meaningful policy oversight structures are in place.



United States Department of the Interior

BUREAU OF INDIAN AFFAIRS
Washington, DC 20240

February 22, 2024

Memorandum

To: Kathleen Sedney
Assistant Inspector General for Audits, Inspections and Evaluations

From: Deputy Bureau Director, Field Operations
Exercising by delegated authority of the
Director, Bureau of Indian Affairs

 Digitally signed by
BARTHOLOMEW STEVENS
Date: 2024.02.22 16:15:42
-0700

Subject: Management Response to Recommendations in Draft Report (No. 2022-ER-021) The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections

The Bureau of Indian Affairs (BIA) appreciates the opportunity to comment on the U.S. Department of the Interior Office of Inspector General (OIG) Draft Audit Report – The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections.

This memorandum transmits the BIA management’s response to the audit recommendation, plans for corrective actions, and documentation of corrective actions taken thus far. IA management is committed to improving and taking appropriate steps to implement standardized and comprehensive policy and oversight plans for vehicle inspections and reviews. Our detailed response is below:

Recommendation 3: We recommend that the BIA conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

Actions Planned: BIA management concurs with the recommendation. The “Interagency Standards for Fire and Fire Aviation Operations,” commonly referred to as the “Redbook,” provides interagency guidance for all wildland fire operations, including bureau specific guidance for wildland fire management vehicle inspections. Per the Redbook, chapter 6 under BIA Program Organization and Responsibilities; daily preventative maintenance checks, regular servicing, prompt repairs, and lifecycle replacement are critical to providing mission readiness, performance, and safe operation.

BIA plans to review current inspection activities to ensure personnel will complete, monitor, report, and document annual safety inspections, regularly scheduled preventative maintenance, and daily (or pre-trip) inspections for all BIA wildland fire vehicles. Annual safety inspections must be documented on Form 1520-35 or designated local form. Regularly scheduled preventative maintenance, unscheduled maintenance, and repairs for DOI-29 owned (I-plate) vehicles are to be recorded in FBMS. Daily inspections must be kept with the vehicle records for

the life of that vehicle. With the Transition to vehicles and apparatus from the National Fire Equipment Program (NFEP), the utilization of a Fire Equipment Maintenance Procedure and Record (FEMPR) specific to the class of vehicle; it allows for detailed procedure and recording of all inspections, maintenance, and repair. This is also in alignment with 25 Indian Affairs Manual (IAM) 4-H Indian Affairs Motor Vehicle Safety Handbook.

BIA will provide training to Regional and Agency level personnel on the implementation of thorough annual readiness reviews. Training will also be provided on all preparedness review checklists to improve review performance and monitoring and enforcement of requirements will be performed to correct the deficiencies identified by OIG.

Responsible Party: Office of Trust Services, Division of Wildland Fire Management

Actions Taken: Wildland Fire Management has implemented the use of the Wildland Fire Management Readiness Review Policy. New checklists were developed and implemented on June 17, 2022, through a policy memorandum. The new checklists require a much more extensive review process for all units and include the development of correction action plans for deficiencies. During Annual Readiness Reviews, review of vehicle operation, records, and equipment is required. The FEMPR is a living record that is being included in wildland fire apparatus, specifically the Model 52 Fire Engines and all other fire vehicles acquired through the NFEP to guide and record all inspections, maintenance, and repairs. Vehicles in the fleet that are used for wildland fire management that do not have a FEMPR may utilize the Form 1520-35 or locally developed form that meets BIA Motor Vehicle Safety Requirements in accordance with 25 IAM 4-H.

Through the Policy Update – Engine Operator Course (N-9018) and Engine Operator (ENOP) Position Requirement dated October 18, 2021, ENOP implementation is required for Engine Operator positions and to qualify as an Engine Boss by no later than January 1, 2022, for all employees seeking to qualify as an Engine Operator and/or Engine Boss. These courses provide training on driving, operating and the tactical use of wildland fire engines safely and proficiently. An Engine Boss is required for all Fire Engines. ENOP applies specifically to Fire Engines and not other vehicles. To date since the ENOP implementation memorandum four hundred twenty students have completed the ENOP course. This number will continue to grow as more ENOP courses are held and students complete the courses as ongoing training. All training records are tracked and uploaded in the Incident Qualification and Certification System (IQCS) for all employees.

Target Date: **12/31/2024**

List of Attachments:

Attachment A: Policy Update – Engine Operator Course (N-9018) and Engine Operator (ENOP) Position Requirement

Attachment B: Wildland Fire Management Readiness Review Policy and Implementation of New Readiness Review Checklists



United States Department of the Interior
BUREAU OF LAND MANAGEMENT
National Headquarters
Washington, DC 20240
<https://www.blm.gov>



In Reply Refer To:
1245/9210 (750/FA-400)

Memorandum

To: Kathleen Sedney
Assistant Inspector General for Audits, Inspections, and Evaluations

Through: Steven H. Feldgus
Principal Deputy Assistant Secretary,
Land and Minerals Management

From: Tracy Stone-Manning
Director

Subject: Office of Inspector General Draft Inspection Report – The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections (2022-ER-021)

Steven H.
Feldgus

Digitally signed by Steven H. Feldgus
Date: 2024.02.15
15:53:01 -05'00'

Tracy Stone-Manning

Digitally signed by Tracy Stone-Manning
Date: 2024.02.15
15:21:29 -05'00'

Thank you for the opportunity to comment on the Office of Inspector General (OIG) draft report "The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections" (2022-ER-021). The Bureau of Land Management (BLM) appreciates the work of the OIG team and the emphasis the report places on completing preventative maintenance and vehicle inspections. The BLM Fire Program champions vehicle inspection and maintenance protocols as a means of improving firefighter safety and reducing fleet repair costs.

In the draft report, the OIG issues six recommendations, one of which is specific to the BLM. The BLM generally agrees with the inspection findings and concurs with Recommendation 4.

Provided below is the BLM's response to address the recommendation.

Recommendation 4: We recommend that the BLM conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

Response: The BLM by policy requires annual vehicle inspections for all wildland firefighting vehicles and daily preventative maintenance checks during periods of active use of the

equipment. The BLM also inspects wildland firefighting vehicles as part of annual wildland fire preparedness reviews. Factors that may have contributed to the lack of documented annual vehicle inspections for the sampled vehicles include:

- Annual inspection/service had not yet been completed at the time of the data request.
- Some vehicles may have not been present during preparedness reviews due to wildfire activity or repair work. BLM preparedness reviews require a follow-up inspection of equipment not present at the time of the main review.

The BLM Fire and Aviation Directorate will place increased emphasis on reviewing fire equipment and associated documents during all scheduled Fiscal Year 2024 national preparedness reviews.

As stated in BLM H-1525-1, Fleet Management Handbook, Chapter 12 – BLM National Fire Equipment Program (released April 6, 2023), as well as in the 2023 Interagency Standards for Fire and Fire Aviation Operations, Chapter 2 - BLM Program Organization and Responsibilities, it is agency policy to maintain each piece of fire equipment to perform at a high level, consistent with the work for which it has been designed. A uniform preventive maintenance program will be applied, and the Fire Equipment Maintenance and Procedure Record, which requires annual vehicle inspections for all wildland firefighting vehicles and daily preventative maintenance checks during periods of active use of the equipment, will be followed. Offices are required to document these inspections. The BLM Fire and Aviation Directorate will update current processes to achieve full compliance with current BLM policy to inspect every fire vehicle at the appropriate intervals.

Target Date: June 30, 2024

Responsible Official: Grant Beebe, Assistant Director, Fire and Aviation

If you should have any questions or need additional information, please contact Amy Hay, Chief, Division of Business, Engineering, and Evaluations, at [REDACTED] or LaVanna Stevenson, Audit Liaison Officer, at [REDACTED]



United States Department of the Interior

FISH AND WILDLIFE SERVICE



In Reply Refer To:
FWS/MA/PERMA/RM/080178

Ms. Kathleen Sedney
Assistant Inspector General for Audits, Inspections, and Evaluations
U.S. Department of the Interior
Office of the Inspector General
1849 C Street, NW, MS 4428
Washington, DC 20240

Dear Ms. Sedney,

Thank you for the opportunity to comment on and respond to the draft evaluation report entitled *The U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus Conducted Routine Vehicle Inspections (2022-ER-021)*. Resolving audit issues continues to be an agency priority, and the Service values the opportunity to improve.

The Service concurs with the recommendation in the draft report and the Service's planned actions to address the recommendation are listed below.

Recommendation 5. We recommend that the FWS conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

Corrective Actions:

The Fire Management Branch will develop interim guidance on the performance and documentation of daily inspections and will perform an annual inspection on all fire fleet within 60 days of issuance of the final OIG report and annually thereafter. Documentation of completed inspections will be housed in the Fire Management Branch's SharePoint site.

The Fire Management Branch will work with our Joint Administrative Operations (JAO) Fleet Program to develop standard fire equipment identification processes within FBMS to facilitate accountability of the Service's wildland firefighting fleet.

Responsible Official: Chief, National Wildlife Refuge System
Target Date: December 31, 2024.

Sincerely,

Digitally signed by
MARTHA WILLIAMS
Date: 2024.01.10
10:09:07 -05'00'

Martha Williams
Director



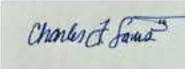
United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, NW
Washington, DC 20240

Memorandum

To: Assistant Inspector General for Audits, Inspections, and Evaluations

From: Director  Digitally signed by
CHARLES SAMS
Date: 2024.02.01
15:01:45 -05'00'

Subject: National Park Service Response to: Office of Inspector General Draft Evaluation Report entitled: "U.S. Department of the Interior Did Not Ensure Its Wildland Firefighting Bureaus conducted Routine Vehicle Inspections" Report Evaluation No. 2022-ER-021"

The National Park Service (NPS) responded to the subject Office of Inspector General (OIG) Evaluation Report on January 17, 2024. OIG circled back to NPS on January 18, 2024, with *"while we appreciate that NPS concurred with our recommendation, [OIG] would like some clarification on how NPS actually plan to implement it."*

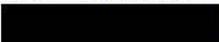
Recommendation 6: We recommend that the NPS conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.

NPS Initial Response: Concur. The NPS recognizes the recommendation to conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy. NPS is actively investigating potential methods to enhance documentation of vehicle inspections and policy compliance.

NPS Revised Response: Concur. The NPS recognizes the recommendation to conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy. Multiple factors may have contributed to these issues including workforce challenges and competing priorities. The NPS, by policy and standard, requires completed and documented annual safety inspections and preventative maintenance inspections for all NPS wildland fire vehicles. The NPS Division of Fire and Aviation will place increased emphasis, in coordination with regional directors, on reviewing fire equipment and associated documentation during scheduled 2024 preparedness reviews with a target date of June 30, 2024. The NPS Branch of Wildland Fire will also reiterate the 2023 Interagency Standards for Fire and Fire Aviation Operations, Chapter 3 – NPS Program Organization and Responsibilities for annual and daily vehicle inspections. Additionally, NPS is actively investigating potential methods to enhance documentation of vehicle inspections and policy compliance through centralized electronic means.

Target Date of Implementation: November 16, 2024

Responsible Official: NPS Wildland Fire Branch

If you should have any questions or need additional information, please contact Vera Washington, NPS Audit Liaison Officer, at  [@nps.gov](mailto:vera.washington@nps.gov)

Appendix 4: Status of Recommendations

Recommendation	Status	Action Required
<p>2022-ER-021-01 We recommend that the Office of Wildland Fire develop and ensure implementation of a Departmentwide policy to standardize inspection and preparedness review requirements for wildland fire vehicles, which should include, at a minimum, inspection intervals and documentation requirements.</p>		
<p>2022-ER-021-02 We recommend that the Office of Wildland Fire develop and implement a Departmentwide oversight plan, including compliance monitoring and specific corrective actions, to ensure vehicle inspections are completed in accordance with the policy created in Recommendation 1.</p>		
<p>2022-ER-021-03 We recommend that the Bureau of Indian Affairs conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.</p>	Resolved	We will track implementation.
<p>2022-ER-021-04 We recommend that the Bureau of Land Management conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.</p>		
<p>2022-ER-021-05 We recommend that the U.S. Fish and Wildlife Service conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.</p>		
<p>2022-ER-021-06 We recommend that the National Park Service conduct inspections of all active wildland fire vehicles and complete preparedness reviews in accordance with policy.</p>		



REPORT FRAUD, WASTE, ABUSE, AND MISMANAGEMENT

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Every day, DOI employees and non-employees alike contact the OIG, and the information they share can lead to reviews and investigations that result in accountability and positive change for the DOI, its employees, and the public.

Who Is Protected?

Anyone may request confidentiality. The Privacy Act, the Inspector General Act, and other applicable laws protect complainants. Section 7(b) of the Inspector General Act of 1978 states that the Inspector General shall not disclose the identity of a DOI employee who reports an allegation or provides information without the employee's consent, unless the Inspector General determines that disclosure is unavoidable during the course of the investigation. By law, Federal employees may not take or threaten to take a personnel action because of whistleblowing or the exercise of a lawful appeal, complaint, or grievance right. Non-DOI employees who report allegations may also specifically request confidentiality.