



United States Department of the Interior



BUREAU OF LAND MANAGEMENT
Alaska Fire Service
P.O. Box 35005
Fort Wainwright, Alaska 99703-0005
www.blm.gov/alaska

In Reply Refer To:
1617 (LLAK9F0000)

JUL 11 2018

Memorandum

To: Acting State Director

From: Kent Slaughter 
Deputy State Director, Fire and Aviation

Subject: Partial Exemption from FA IM 2016-022 Procurement and Use of All-Terrain Vehicles (ATV's) by the Fire Program

The Bureau of Land Management Alaska Fire Service (BLM AFS) requests a partial exemption to the requirements of FA IM 2016-022. The BLM AFS requests that the non-industrial use of ATVs be permitted in limited circumstances associated with fire operations located in remote sites within Alaska. This request is in compliance with BLM IM 2016-132 which allows state directors to approve exceptions for continued ATV use on a case-by-case basis.

FA IM 2016-22 directed the BLM Fire program to cease all use of ATVs by January 1, 2018. It was predicated on the increased occupant safety of utility terrain vehicles (UTVs), the increased availability of UTVs, and the risk of injury when poorly trained and inexperienced riders use ATVs in off-highway situations.

The BLM AFS manages wildland fire operations on over 191 million acres in Alaska for multiple agencies. Most of that area is remote and only accessible by aircraft. Fire operations in those areas are typically based out of nearby villages that are not on the road system. Off-highway vehicle use is generally limited to flat or gently sloping ground on or near an airfield and predominately used as a mechanism to move supplies or transport people to and from a village. Use of ATVs on the fireline in Alaska has historically been very limited due to the terrain and vegetation.

Full compliance with FA IM 2016-22 has created hardships on Alaskan wildland fire management operations in preparedness and suppression. These hardships have been observed in the remote areas of Alaska that are not located on the road system. BLM AFS is highly reliant on the use of ATV in rural areas not on the road system to achieve a myriad of tasks including heli-base use, cargo retrieval, patrol, and staging area operations.

As noted above, the majority of lands BLM AFS operates on are located off the road system and adjacent to remote villages, frequently with long distances between the airstrip and the village itself. Connections are often rudimentary roads and trails primarily travelled by ATVs. The majority of off-highway vehicles utilized by BLM AFS are rented from owners who live locally in these villages.

When ATVs are unavailable for hire, BLM AFS has the ability to transport agency owned-ATVs with its fleet of contract CASA airplanes. At this time, we are unable to transport UTVs due to the height of the roll over protection system (ROPS). AFS will continue to monitor products produced by UTV manufactures to evaluate if there is a removable ROPS available for easy aircraft transport or other products that may serve our needs and meet our limitations.

The BLM AFS has a strong safety record with ATV use for fire operations. Unintended outcomes of a ban include potentially transferring risk to personnel or to an alternate type of transportation, such as considerably costlier helicopters.

The BLM AFS, if allowed to continue with ATV use on a limited basis, will strive to exceed national standards in regards to Personal Protective Equipment (PPE), training, transport and safety. All incidents will be appropriately reported and investigated, and all riders will continue to be fully qualified and certified through the ATV Safety Institute certification program as well as the BLM ATV Advanced Rider training program.

The BLM AFS requests limited approval of the continued use of ATVs when UTVs are not available for rental in a community off the road system. Managers and supervisors will make every attempt to utilize a UTV when possible. The decision to authorize use of an ATV will be documented. Use will be limited to non-industrial use by trained operators using full PPE with a Risk Assessment completed and reviewed each time.

Attachment:

1. Example of ATV Risk Management Worksheet
2. Memorandum supporting IM No. 2016-132

Concurrence: ✓ Non-concurrence: _____



Karen Mouritsen
Acting State Director

8-30-78
Date

UNITED STATES DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
WASHINGTON, D.C. 20240
<http://www.blm.gov>

August 3, 2016

In Reply Refer To: 1112 (740) I

EMS TRANSMISSION 08/23/2016
Instruction Memorandum No. 2016-132
Expires: 9/30/2019

To: State Directors
Assistant Directors
Director, Office of Law Enforcement and Security
Director, National Operations Center

From: Deputy Director for Operations

Subject: Procurement and Use of All-Terrain Vehicles (ATVs)

PROGRAM AREA: All

PURPOSE: In an effort to reduce risk and injury, this Instruction Memorandum (IM) directs all Bureau of Land Management (BLM) programs to cease the procurement of all-terrain vehicles (ATVs). This IM also establishes policy for discontinuing the use of ATVs by BLM personnel.

POLICY /ACTION: Effective immediately, all BLM programs will cease the procurement of ATVs. The ATVs currently in service may continue to be utilized for non-industrial use operations until October 1, 2019. After this date, BLM personnel will not utilize ATVs for any activities.

Employees of cooperating agencies/entities may utilize ATVs on BLM projects if allowed by their individual agency/entity policy. This IM does not affect transition time frames for the Fire and Aviation program, as described in FA IM 2016-022. It also does not affect the existing BLM ban on the industrial use of ATVs which went into effect on May 13, 2015 per the BLM Handbook 1112-1. The policies and procedures set forth in this IM do not apply to ATV use by BLM law enforcement personnel (e.g., Law Enforcement Rangers, Special Agents)

while performing law enforcement functions. The BLM Office of Law Enforcement and Security (OLES) will establish counterpart policy via an IM or Law Enforcement General Order governing the utilization of ATVs by the BLM law enforcement personnel for law enforcement purposes.

Programs may continue to procure and utilize other commercially available utility terrain vehicles (UTVs), provided the vehicle meets the following criteria:

- has manufacturer-installed seat belts,
- has a steering wheel,
- is a multi-seat or newly available single-seat model (such as the Polaris Ace), and
- is equipped with a certified roll-over protection structure (ROPS) designed and installed by the original equipment manufacturer as standard equipment.
 - All ROPS must meet the standards set forth in BLM Manual 1112-1, Safety Program Management, chapter 17, Off-Highway Vehicle (OHV) Safety (<http://web.blm.gov/internal/wo-500/directives/dir-hdbk/h1112-1.pdf>).

A risk assessment (BLM Form 1112-5) that considers the predominant mission will determine the type and model of UTV to be purchased.

State Directors, Assistant Directors, and the Director, National Operations Center have the authority to approve exceptions to this policy on a case-by-case basis. All requests for exceptions must be in writing and will include:

- a description of how the ATV is essential for the performance of official duties,
- analysis of the alternatives that were considered,
- justification for an ATV being the only viable option, and
- concurrence by the applicable Field Manager, District Manager, District Safety Manager, and the State Safety Manager.

Please note that cost is not a basis for approval of an exception and no exceptions may be made to the existing ban on industrial use of ATVs.

TIMEFRAME: Effective immediately.

BUDGET IMPACT: Offices may be required to procure UTVs at increased expense compared to ATVs. Most UTVs will require the use of trailers for transport; trailers over the cost of \$15,000 are included in the Working Capital

Fund. Small UTVs less than 50 inches wide (such as the Polaris Ace) may be transported in trucks in according with assisting guidance.

BACKGROUND: The off-highway vehicle (OHV) program is of critical importance to all BLM programs. Incident rate data and tilt testing strongly support an increased safety margin for UTVs compared to ATVs. Industrial use of ATVs has been prohibited since May 2015, as per BLM Handbook 1112-1, chapter 17. Industrial use is defined as a process in which the ATV is used as an integral part of fuel firing or pesticide application, or transportation of greater than 15 gallons of liquid cargo. Industrial use does not include attachment of a utility trailer to transport cargo.

An ATV is defined as a motorized off-highway vehicle 50 inches or less in width, having a seat to be straddled by a single operator and steered by handlebars, traveling on four or more low- pressure tires, and that is not factory equipped with seat belts or ROPS.

Employees and volunteers have the responsibility to follow all safe operating procedures and also have the right and obligation to decline the operation of UTVs at any time if they feel the situation or the equipment is unsafe.

MANUAL/HANDBOOK SECTIONS AFFECTED: The BLM Manual Handbook 1112-1.

COORDINATION : This IM was coordinated with BLM's Office of Safety, Health, and Emergency Management and the Field Committee, incorporating input from program leads in affected program areas.

Contact: Questions or concerns regarding this policy may be directed to Herb Carpenter, Chief of Safety, Health, and Emergency Management at (202) 912-7498.

Signed by:
Steve A. Ellis
Deputy Director

Authenticated by:
Robert M. Williams
Division of IT Policy and Planning, WO-
870

UNITED STATES
DEPARTMENT OF THE INTERIOR
BUREAU OF LAND MANAGEMENT
RISK MANAGEMENT WORKSHEET

1. Organization and Location Alaska Fire Service		2. Page <u>1</u> of <u>4</u>	
3. Operation / Task ATV Operation		6. Date Prepared	
4. Beginning Date:		5. Ending Date:	
7. Prepared by :			
8. Identified Hazards (Be Specific) All Terrain Vehicle (ATV) operation: Loading and Unloading - General operational hazards (includes dust, flying debris, low hanging branches, etc.) - Collisions with other ATV's, pedestrians, animals, etc.	9. Assess the Hazards: Initial Risk	11. Assess the Hazard's Residual Risk:	13. Supervisors and Evaluation by: (Continuous Leader Checks, Buddy System, etc.)
	L M H E	L M H E	(Be Specific)
	X	X	Supervisor insures ATV Safety training is current. Buddy System (i.e. minimum of two person/two ATV's for field operations). Same as above
	X	X	Operators will complete a Bureau training course in safe ATV operation and operate as per requirements of Ch 17 of BLM Safety Manual H-1112-1 Official training, practicing loading and unloading, pre-season ride/refresher
	X	X	Bureau will provide required specialty PPE: DOT approved helmet, Supervisor provides funding for required PPE.

						<p>including DOT approved helmet, ANSI rated glasses, goggles or face shield, leather gloves, over-the-ankle boots and long sleeve shirt and long pants.</p> <p>ATV operator should reduce speed when: near other ATV's, pedestrians or animals;</p>												<p>Supervisor insures ATV Safety training is current</p>
goggles or face shield and leather gloves.	Operator should follow the SIPDE process to																	

8. Identified Hazards (Be Specific)	9. Assess the Hazards: Initial Risk			10. Control Measures Developed for Identified Hazards: (Specific measures taken to reduce the probability of a hazard)			11. Assess the Hazard's Residual Risk:			12. How to Implement the Controls: (May Be Filled in By Hand)	13. Supervisors and Evaluation by: (Continuous Leader Checks, Buddy System, etc.)		
	L	M	H	E	(Be Specific)			L	M	H	E	(Be Specific)	
- ATV rollover			X		low visibility conditions; or operating in areas with reduced sight distance. Anticipate actions of others and be prepared to perform evasive maneuvers. Use headlights and antenna flag.							help maintain situational awareness. Ride defensively.	provides funding to insure ATV's are properly equipped.
- Community Road use		X			ATV operator should reduce speed before making turns in uneven terrain or when traversing side slopes. Apply proper weight shift techniques. Change to easier route if necessary.			X				Operators will complete a Bureau training course in safe ATV operation.	Supervisor insures ATV Safety training is current.
- Winch operation			X		ATV operator should cross road surfaces perpendicular to road when clear of traffic. Yield to community traffic when possible. Maintain slow speeds				X			Operator exercises caution when crossing roadways.	Supervisor insures ATV Safety training is current.
- Cargo hauling		X			ATV winch operator should be familiar with winch operation, wear appropriate PPE.				X			Operators will complete the advanced rider course.	Same as above.
- ATV Trailering		X			Do not exceed ATV rack or total load capacity. Load ATV so the center of gravity is kept as low as possible. Secure loads so they do not shift. Do not allow loads to protrude beyond racks. Use an ATV trailer if necessary.							Same as above.	Same as above.
					ATV operator should wear full PPE when loading/unloading ATV's from transport vehicles. Follow SOP for loading/unloading ATV's.				X			Same as above.	Same as above.

14. Remaining Risk Level After Control Measures Are Implemented: (CIRCLE HIGHEST REMAINING RISK LEVEL)

	LOW (Line Supervisor)	MEDIUM (Branch Chief)	HIGH (District Manager)	EXTREMELY HIGH (Must be State Director/Associate)
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15. RISK DECISION AUTHORITY: (Approval/Authority Signature Block) (If Initial Risk Level is Medium, High or Extremely High, Brief Risk Decision Authority at that level on Controls and Control Measures used to reduce risks) (Note: if the person preparing the form signs this block, the signature indicates only that the appropriate risk decision authority was notified of the initial risk level, control measures taken and appropriate resources requested; and that the risk was accepted by the decision authority.)

(Signature)