Cost-Share Agreement Impact on Local Government

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Executive Analysis of Fire Service Operations in Emergency Management

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Appendices Not Included. Please visit the Learning Resource Center on the Web at http://www.lrc.dhs.gov/ to learn how to obtain this report in its entirety through Interlibrary Loan.
Certification Statement

I hereby certify that this paper constitutes my own product; that where language or others is set forth, quotation marks so indicate, and that appropriate credit is given where I have used language, ideas, expressions or writings of another.

Signed:__________________________________________
Abstract

Local governments have been financially impacted by wildland fire cost-share agreements. The purpose of this research was to investigate alternative funding approaches to cost-share agreements associated with urban interface fire suppression costs. Descriptive research was applied to considering the dynamics of the cost-share agreement, the current funding options available, and what consequences exist for non-payment. The results of this research indicated that most local governments pay their share of the agreement after months of negotiations with federal agencies. Few options were found which do not financially impact local government. Political and legislative changes were a leading recommendation of this research, as well as maintaining flexible options to the development of cost-share agreements between federal and non-federal agencies.
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Introduction

Several local government agencies in northwestern Nevada have been financially impacted by federal cost-share agreements. Each year many of these agencies are subjected to large dollar/loss urban interface fires. The majority of local jurisdictions are surrounded or abutted by properties held either by the Bureau of Land Management or the United States Forest Service. Under federal policy and guidelines, federal agencies require local government to assume a portion of the financial obligation of fire suppression for fires which border federal lands. The problem is that the East Fork Fire and Paramedic Districts are in need of finding alternative funding approaches to federal cost-share agreements associated with urban interface fire suppression costs. Over the past several years, dating back to the Autumn Hills fire of 1996, the East Fork Fire and Paramedic Districts continue to see our community’s threat to wildland fire increase each year, which translates into an increased liability of sharing in the cost of the fire suppression efforts.

The purpose of this Applied Research Project is to investigate alternative funding approaches to fund federal cost-share agreements associated with urban interface fire suppression costs. The descriptive method of research will be used to answer the following questions:

1. What are the primary elements and requirements of a cost-share agreement?
2. What current options exist to fund local government costs associated with federal cost-share agreements?
3. What programs have other western states implemented to transfer financial responsibility from local government to state government?
4. What are the consequences or repercussions if local government is unable to meet the financial obligations of a cost-share agreement?

Background and Significance

The East Fork Fire and Paramedic Districts are located in Douglas County, Nevada at the base of the Sierra Nevada Mountain Range in northwest Nevada. Douglas County is home to Lake Tahoe and is a neighboring county to the state capital of Carson City, Nevada.

Two separate special Districts compose the East Fork Fire and Paramedic Districts. Both were established under Nevada Revised Statutes. The East Fork Fire Protection District was established under Nevada Revised Statute 474 in 1981. The East Fork Paramedic District was established under Nevada Revised Statute 318 in 1984. Both Districts are governed under one authority through an inter-local agreement and managed by a single fire service orientated management team. The Districts, through an interlocal contract, provide all-hazard services to the Sierra Forest Fire Protection District of Douglas County, which contains one of the area’s largest urban interface populations located in the foothills of the Sierra Nevada Mountain Range.

The area is a mix of agricultural interests, suburban areas, urban areas, and urban interface zones. There is a good mix of commercial, industrial, and retail sales establishments. The population of the Districts includes a 50,000 person resident population. Depending on the season, the total population of the Districts can surge to over 65,000 persons. Douglas County promotes “quality of life” to attract new business and residential development, however that is rapidly changing.

The Districts are governed by the Douglas County Commission who serve as Trustees for the Districts. The administration of the Districts works directly for the five-member County Commission. A District Fire Chief, who is assisted by three Deputy Fire Chiefs, three Battalion
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Chiefs and additional officers, line, and support staff, leads the Districts. The Districts’ administration manages ten volunteer fire departments within the Districts’ 650 square miles of primary response area. Each volunteer department participates in the operation of the Districts through the Volunteer Fire Chiefs’ Advisory Board. (See Appendix A for organizational chart.) The Districts employ 50 career personnel as all-risk providers and functions under the combination service model with over 150 volunteers.

Like many fire jurisdictions in the western United States, the Districts are bound by substantial federal lands, which are often subjected to significant wildland fire events.

Each year the Districts respond to several urban interface events along the eastern slope of the Sierra Nevada Mountain Range and an extensive plateau area below the Pine Nut Mountain Range. Considerable resources are generally committed in the primary and secondary phases of fire activity. The costs associated with urban interface and non-interface firefighting can be significant. After the initial 24-hour suppression effort, most mutual and cooperative agreements have been exhausted and cost-share agreements are discussed and applied. A variety of methods are used to define financial responsibility between federal entities, state, and local government. While some guidance is provided in cooperative agreements, clear and specific direction is often missing during the actual implementation of the cost-share agreement. The process becomes one of negotiation and bargaining. The manner in which the cost-share agreement is conceived can have significant financial implications for the parties to the agreement. This is especially true for local jurisdictions.

Once an agreement on cost sharing has been reached, the financial liability of the parties to the agreement is directly proportional to the magnitude and duration of the incident. In some
cases command decisions are made based upon potential cost liabilities and not on sound tactical or strategic decision making.

This Applied Research Project was completed as required by following the guidelines published in the National Fire Academy’s Operational Policies and Procedures Applied Research Guidelines Manual (National Fire Academy, 2003). The United States Fire Administration’s (USFA) operational objective, to respond appropriately in a timely manner to emerging issues, is directly related to the issue of cost-share agreement impact on local government. Additionally, it is reflective of an issue which is relevant to the Executive Fire Officer Program course, Executive Analysis of Fire Service Operations in Emergency Management.

It is anticipated and expected that the research information contained within this Applied Research Project will be used to verify and better define the problem and review solutions which will allow the Districts and other local governments more insight into the cost-sharing agreement concept and the financial liabilities that exist.

Literature Review

A review of applicable literary resources was conducted at the National Fire Academy utilizing the Learning Resource Center (LRC). Other pertinent literature was provided through the use of internet searches, the Douglas County Public Library system, text reference books, regional wildland fire cost studies, and congressional testimonies. This literature review will initially examine the cost-share agreement philosophy followed by a detailed investigation into the more specific issues generated with the application and use of cost-share agreements in today’s wildland and urban interface firefighting.

The costs associated with wildland firefighting continue to increase each year. Fighting wildland fires is a dangerous and expensive venture and getting more so as we are confronted
with today’s complex set of environmental, social, political, and safety concerns. There is no lack of logical recommendations on how to control costs on large fires (United State Department of Agriculture, 2004). Suppression costs to manage wildland fires include the extraordinary costs incurred by fire line, command and support personnel; all wages for temporary emergency firefighter personnel; fire suppression/monitoring aircraft flight operations and ramp support; logistical service for all employees assigned to incidents; suppression and monitoring supplies and equipment (including replacement of lost or damaged capital and expendable equipment); contracts for goods and services; administrative support directly associated with incidents; and immediate measures to rehabilitate resources damaged by fire suppression efforts (Ferry, 2003). In Fiscal Year 2003, one of the worst fire seasons nationally, the United States Forest Service expended $1.02 billion to suppress wildland fires, and the Department of the Interior’s suppression costs were $303 million (United State Department of Agriculture, 2004). Since 1980, 2.8% of the more than 400,000 federal wildland fires exceeded 300 acres. In the Forest Service, these wildland fires have averaged over 800,000 acres burned per year at an average annual cost of more than 350 million dollars (West, 2005). Last year, local jurisdiction expenditures for wildland fire suppression rose to $7,538,168 in the State of Nevada alone (See Appendix G). Similar experiences were shared in most neighboring states. An audit conducted in Montana at the request of the Legislative Audit Committee found the ten-year average cost of suppressing fires of ten acres or less was approximately $4,500 per fire. In comparison, suppression costs for fires of 500 acres or larger averaged $2.3 million per fire (Fire Suppression for Fiscal Year 2007, 2006).

The East Fork Fire Protection District was held financially responsible for over $50,850 in suppression costs for a 500-acre fire, which crossed state lines and four separate jurisdictions
in 2005 (See Appendix B). While most large fires are eligible for FEMA funding, a local contribution of twenty-five percent of the total cost is still necessary. In many cases, the smaller fires, i.e. those not eligible for FEMA reimbursement, can cause severe financial hardship on local government. Cost sharing is initiated irrespective of any federal reimbursement program.

Forest Service conservationists were encouraged as early as 1990 to begin thinking about demanding greater fiscal and environmental accountability in federal fire service management and practices (American Lands Alliance, 2000). Federal and non-federal entities use a variety of methods to share the costs of fighting wildland fire affecting both of their lands and resources (Better Guidance Needed, 2006). In most cases, cooperative agreements between the various entities involve providing the basic structure for cost sharing, and typically list several ways in which costs are distributed. In general, the states or local jurisdictions are responsible for fire protection on non-federal lands. Typically, local governments are responsible for putting out structure fires. Maintaining some separation between suppressing structural fires and wildland fires may be appropriate because the suppression techniques and firefighter hazards differ substantially. Nonetheless, cooperation, including the sharing of costs, is also warranted simply because of the locations of federal, state, and local firefighting forces (Gorte, 2005).

Over the past several years the federal government has attempted several cost containment strategies. Recognizing the need to control expenses, the United States Forest Service has recently recommended that suppression costs need to be fairly shared by state and local government (Young, 2006). The Forest Service has found that the majority of large fire suppression costs are directly linked to protecting private property. In many cases, fire service managers have not renegotiated their agreements with state and local governments to apportion wildland urban interface protection responsibilities and costs as required (Young, 2006).
The federal government has made it very clear that local government must share in the cost of wildland firefighting. The Forest Service’s escalating cost to fight fires is largely due to its efforts to protect private property in the wildland urban interface bordering Forest Service lands (Young, 2006). The transfer of the financial responsibility for fire suppression efforts on private property within the urban interface area bordering all federal properties has, for the most part, taken most local jurisdictions by surprise. To ensure non-federal entities pay an equitable share of wildland urban interface protection costs, the Forest Service has recommended that clarification from Congress be solicited as to the responsibilities of the federal government vs. those of state and local government with respect to private property protection and suppression and to renegotiate fire protection agreements as appropriate (Young, 2006). The federal government’s position regarding the financial liability for suppression on private properties is supported in as much as they do not have the power to regulate urban interface development. Zoning, planning, and code enactment and enforcement authority rests with state and local government. Unregulated interface development increases the suppression costs.

The literature review clearly identified that wildland fire suppression is expensive and continues to rise with each benchmark fire season. Federal policy has, over the past five to six years changed, whereby fire suppression costs on privately held properties are now being passed or shared by state and local jurisdictions. State and local agencies will continue to share in the cost for fire suppression on non-federal lands.
Procedures

The procedure used to complete this Applied Research Project was selected to best examine and define the problem nationally, and more importantly, locally, and to identify possible solutions and funding options used in other western states which would be beneficial to local agencies engaged in cost sharing.

The descriptive method was used to examine the problem. Based upon the problem, the first step was to identify its validity nationally, followed by a more local review within the East Fork Fire and Paramedic Districts and neighboring jurisdictions. The literature review proved invaluable in identifying the significance of the problem nationally and regionally and to evaluate past research efforts on the topic. A literature review at the National Fire Academy (NFA) Learning Research Center was conducted during Executive Analysis of Fire Service Operations in Emergency Management Course attendance in July 2006. During this process, several publications discussing the wildland firefighting costs and cost containment were discovered. Very few publications were found which discussed the cost-share agreement practice. This can be attributed to the fact that the issue is an emerging issue within the fire service. The literature review also focused on the specific questions being asked in the problem. The vast majority of research was conducted through internet sources, periodicals, and after-cost share analysis documents and testimonies. Publications, which could be retrieved in the conventional manner, were solicited, collected, and organized based upon relative importance. During the months of October and November the research materials necessary to answer the specific questions were assembled. Current sources following the 2006 wildland fire season were also included as they became available.
A seven-state review of funding applications for cost sharing was conducted by phone poll (See Appendix F). Those states selected included Arizona, Idaho, Nevada, New Mexico, Oregon, Utah, and Wyoming. The states selected all have vast areas of federal lands that are exposed to wildland fire each year. In some cases the author was able to gather the necessary information from several sources, including state law and policy. Several cost-share agreements were also reviewed to determine how consistent cost-sharing agreements were drafted and established.

The final step allowed the author to draw some specific conclusions regarding cost-share agreements and alternative funding measures for local government based upon other programs in other states.

The author identified only a few limitations during the course of this research project. The most significant limitation of this Applied Research Project was the lack of other applied research on this specific topic. The issue is an emerging one for those fire agencies charged with wildland urban interface fire suppression and control. Some sources were published during the preparation of this Applied Research Project and tended to dominate the research at times.

The time allowed to complete this Applied Research Project was problematic for the author with respect to his duties as District Fire Chief, and especially during the specific period of time: July 2006 – January 2007.

The author was able to use the Applied Research Project to better understand the basics of cost-share agreements and to define how other states and local jurisdictions meet the financial obligations of the cost-share agreements.
Definitions

- ARP - Applied Research Project
- NFA - National Fire Academy
- LRC - Learning Resource Center - located at the National Fire Academy in Emmitsburg, Maryland
- Wildland Urban Interface - An interface zone is an area where development and wildland fuels and vegetation meet at a well defined boundary.
- Cost-share agreement – A document prepared between a federal, state, or local jurisdiction to distribute costs on a multi-jurisdictional incident, or an incident which burns across boundaries of direct protection areas of the federal agencies, state or local agencies.
- Wildfire – Any fire occurring on wildland except under prescription
- Jurisdictional Agency – The agency which has overall land and resource management and/or protection responsibility as provided by federal or state law.
- Reimbursable Assistance – Fire suppression resources that will be paid for by the protecting agency per the conditions of the cost-share agreement.

Results

The results of this Applied Research Project were completed using both the literature review and the procedures identified. For purposes of organization, the results and findings of the research questions are listed here with each question:

What are the primary elements and requirements of a cost-share agreement? While there are several variations of cost-share agreements, most include the same basic elements. Those elements include the incident name and number; the parties to the agreement; reference to...
cooperative agreements, which may provide specific guidance to cost sharing of specific functions, such as aircraft and the method(s) in which the cost sharing will be determined (See Appendices C and D). Even though most cost-share agreements are similar, the application of the agreement varied. In one state, the costs of suppressing a large fire that threatened homes were shared solely according to the proportion of acres burned within each entity’s area of fire protection responsibility (Better Guidance Needed, 2006). In the same state, costs for a similar fire were shared differently. In this case the state paid for certain aircraft and fire apparatus used for structure protection while the remaining costs were shared on the basis of acres burned. (Better Guidance Needed, 2006). Other applications included the apportioning of costs on a daily basis and allocated based on the type of suppression activity and location of the assignment, i.e. federal or non-federal lands. Several methods to determine cost share are available. Suppression costs on smaller incidents are generally distributed following one of three means: (1) Each agency pays for their own resources – fire suppression efforts are primarily on jurisdictional responsibility lands. (2) Each agency pays for their own resources – services rendered approximate the percentage of jurisdictional responsibility, but not necessarily performed on those lands. (3) Cost share by percentage of ownership or agency jurisdictional responsibility.

Cost sharing for larger incidents obviously becomes more complicated. Two specific methods are applied under this case: (1) Cost is apportioned by geographic division. Examples of geographic divisions are: Divisions A and B; privately owned property with structures; or specific locations such as campgrounds. (2) Reconciliation of daily estimates (for larger, multi-day incidents). This method relies upon daily agreed cost estimates, using Incident Action Plans or other means to determine multi-agency contributions. Reimbursements can be made upon estimates instead of actual bill receipts (Rowdabaugh, 2006). The method(s) used to distribute
costs between federal and non-federal agencies have recently been questioned by the United States Government Accountability Office (GAO). “To strengthen the framework for sharing wildland fire suppression costs, GAO recommends that the Secretaries of Agriculture and the Interior, working in conjunction with relevant state entities, provide more specific guidance as to when particular cost-sharing methods should be used and clarify the financial responsibilities for suppressing fires that burn or threaten to burn across multiple jurisdictions.” (Robinson, 2006)

The National Association of State Foresters was in agreement that “A cost-share agreement must provide the necessary flexibility for all parties to adjust to a changing situation. It cannot be constructed as a contract with hard, inflexible specifications. Variables such as response, need and capability, fire activity and severity, and state legislative authorities preclude the ability to develop specific guidance that can be applied under all circumstances across the country.” (Rowdabaugh, 2006).

What current options exist to fund local government costs associated with federal cost-share agreements? The literature review found that the federal government’s current position is one that commits state and local governments to cost sharing (Robinson & Young, 2006). Very few options actually exist, short of legislative action. Cost-share agreements which are left solely for the local jurisdiction to fund are difficult to plan and budget for given the random nature of wildland fire events in any given jurisdiction. The State of Nevada allows local jurisdictions to establish an Emergency Fund not to exceed $1,000,000 (County Fire Protection Districts, n.d.). Funding for this type of fund is provided through the budget process and funded with taxes and fund interest. Many jurisdictions have established some type of emergency fund using tax dollars as the sole source of funding within the State of Nevada. Other funding mechanisms may include
reimbursement fees received from out of state fire responses, special assessments from urban interface development and in some cases, fines.

What programs have other western states implemented to transfer financial responsibility from local government to state government? The State of Utah, by law, enacted a Wildland Fire Suppression Fund. The fund is made available to all county jurisdictions who enter into a cooperative agreement with the state. Specifically, the law states “After a County’s approved fire suppression budget has been depleted, all fire suppression cost that occur during the fire season, as defined in R-652-121-300, directly related to the control of wildfires on forest, range, and watershed lands within the unincorporated area of a participating county is eligible for coverage by the Wildland Fire Suppression Fund.” (Wildland Fire Suppression Fund, n.d.). The State of Nevada has a similar funding program; however, it applies only to lands directly serviced by the Nevada Division of Forestry (See Table 1).

The State of Wyoming provides for an annual appropriation for fire suppression funding and also allows county government to pay an annual “premium” to the fund which guarantees agencies within that county access to the fund for cost-share agreements. Other states have variations of similar funding programs. Some are available to local agencies and some are not. Most require pre-agreement or a State of Emergency declared by the Governor. (See Table 1)
<table>
<thead>
<tr>
<th>State</th>
<th>Funding Available</th>
<th>How Funded And Amount</th>
<th>Local Government Funding Access</th>
<th>Local Government Funding Access Process</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arizona</td>
<td>Yes</td>
<td>State Budget Allocation $2,000,000 annually with $1,000,000 Severity Funding</td>
<td>Yes</td>
<td>Funds accessed after a State of Emergency is declared for the affected jurisdiction</td>
</tr>
<tr>
<td>Idaho</td>
<td>Yes</td>
<td>State allocation funded as needed</td>
<td>Indirectly</td>
<td>Depending on agreements and jurisdiction after the first 24 hours of operation</td>
</tr>
<tr>
<td>Nevada</td>
<td>Yes</td>
<td>State Budget Allocation $2,000,000 annually</td>
<td>No</td>
<td>None – Funding reserved for State managed areas only</td>
</tr>
<tr>
<td>New Mexico</td>
<td>Yes</td>
<td>State Budget Allocation $750,000</td>
<td>Yes</td>
<td>Funds accessed after State of Emergency is declared for the affected jurisdiction</td>
</tr>
<tr>
<td>Oregon</td>
<td>Yes</td>
<td>State Budget Allocation</td>
<td>No</td>
<td>None – Funding reserved for State managed areas only</td>
</tr>
<tr>
<td>Utah</td>
<td>Yes</td>
<td>State Budget Allocation</td>
<td>Yes</td>
<td>Funds provided only to those agencies party to an agreement with the state.</td>
</tr>
<tr>
<td>Wyoming</td>
<td>Yes</td>
<td>State Budget Allocation $650,000 Annually and Local Government Contribution Program</td>
<td>Yes</td>
<td>Funds are provided only to those local agencies who pay into the program with an annual premium</td>
</tr>
</tbody>
</table>
What are the consequences or repercussions if local government is unable to meet the financial obligations of the cost-share agreement? Ironically, no documentation was discovered which defined any consequence or repercussions for failing to pay other than a 2% interest charge on delinquent accounts, which state and local agencies are exempt from (See Appendix B). In many cases, current protection agreements between federal and non-federal agencies protect or make allowances for costs to be borne by the federal government. Many of these agreements have not been modified for several years and certainly prior to the federal government’s new position on cost sharing. In a recent report issued by the Office of Inspector General, Robert Young, Assistant Inspector General for Audit, wrote “While recognizing the current financial inequality of wildland urban interface protection, Forest Service officials believe that states will not renegotiate protection agreements that increase states’ wildland urban interface costs.” (Young, 2006). In other cases reviewed, costs were eventually paid by local jurisdictions after negotiation.

Discussion

Wildland fire suppression costs will continue to increase each year. The federal government will continue to pursue the sharing of costs with state and local governments. For several years, state and local governments have expected the federal government to pay for all suppression efforts. In most cases, the federal government has in fact covered the majority of suppression costs. The cost of federal fire management is high and rising. Wildfire appropriations for the Forest Service and Department of the Interior totaled less than one billion annually prior to FY 1997. Since FY 2003, funding has been more than three billion annually (Gorte, 2006). Federal policy has not been effectively implemented. Forest Service managers and staff have estimated that approximately 50 to 95 percent of the costs for many large wildland fire
suppression operations were derived from protecting private property (Young, 2006). The federal government’s new attempt to ensure non-federal entities pay equitable shares of wildland fire suppression costs has caught the attention of both state and local government.

There seems to be some general acceptance of the financial liabilities incurred by local government under cost sharing, however, there is significant disagreement in how cost sharing should be distributed. The federal government has advocated a finite and less flexible option for the distribution of costs (Gorte and Young, 2006). State and local governments advocate flexibility for all parties to adjust to changing situations that are inherent with fire suppression efforts (Rowdabaugh, 2006). Local experience within the East Fork Fire and Paramedic Districts would agree that flexibility in cost sharing distribution is critical to all attempts to limit local jurisdictional financial liability. Being able to choose which method will be utilized to calculate costs based upon the dynamics of the incident can make the entire cost share process more palatable. Being able to combine distribution methods is also essential in the successful negotiation of a cost-share agreement from a local government perspective.

The 1995 Federal Wildland Fire Management Policy and its 2001 update, clearly defined the role of the federal agencies in wildland urban interface fire suppression as one assisting non-federal entities. State and local governments were specifically charged with structural fire protection. The 1995 policy also encourages fire protection agreements between federal and non-federal agencies (Young, 2006). While most local and state agencies do have agreements with the federal agencies, many are not up to date with respect to fire suppression costs and financing. A recent attempt by the Forest Service within the State of Nevada to generate a single agreement with each local jurisdiction failed. The reluctance of most local agencies is consistent with the opinion of Robert Young, Assistant Inspector General for Audit. A renegotiated agreement can
lead to an increased financial liability for the non-federal agency, given the federal policy on cost sharing.

While the federal government appears to be very serious about its billing policy, the consequences for failing to pay either out of dispute or simply due to a lack of funds appears to be weak. Reference is made that interest penalties for delinquency in payment will be applied at 2% per year (See Appendix B) however, exemptions are provided to state and local jurisdictions. It can be assumed that failure to pay a federal claim, regardless of the reason, that eligibility for other federal assistance and grant funding could be jeopardized.

The research concluded that those states which offer some type of financial assistance to local governments or provide a funding mechanism available to local government are providing a means to meet the cost sharing commitment which has become a reality in today’s wildland fire suppression. Those who do not have access to alternate funding do what they can to negotiate the billing to the lowest possible amount and make payment within their means.

Recommendations

The research established that cost sharing between federal and non-federal agencies has become an important consideration in today’s wildland fire suppression. Local government’s options to find alternative ways to fund the impact of cost-share agreements are limited. Based upon that conclusion, the following is recommended:

1. Local jurisdictions without alternative funding options, i.e. state funds, should create special funds specific to paying their portions of the cost-share agreement.

2. The State Legislature should be petitioned to establish wildland fire suppression funds which can be made available to local government to fund cost-share agreements.
3. Consideration should be given to the renegotiation of federal/non-federal agency inter-local or cooperative agreements with specific reference to financial responsibilities in fire suppression.

4. The federal government should be encouraged to allow for as much flexibility as possible in determining which method(s) will be used to establish financial responsibility in cost sharing agreements.

5. A fiscally and comprehensive approach to wildland fire management and suppression should be encouraged; one which does not compromise safety, and carefully connects values at risk to strategic and tactical suppression decisions with cost containment as the objective.

Because cost sharing is an emerging issue for the fire service, it is also recommended that additional review, audit, and study be considered.
References


12, 2007, from National Association of State Foresters Web site:

http://www.stateforesters.org/testimony.htm


*Statement of Mark Rey and P. Lynn Scarlett concerning Firefighting Preparedness.*


