

930 STATE AND LOCAL FIREFIGHTING

931 FIRE SUPPRESSION MOP-UP AND PATROL GUIDELINES

A. REQUIREMENTS

1. Fire suppression actions and the allocation of resources in support of suppression actions will reflect the highest priority for firefighter and public safety.
2. All suppression actions will insure the rapid and effective response of appropriate resources to suppress and extinguish wildland fires in Montana. It is essential that Fire Managers execute a rapid initial response of appropriate resources to suppress wildfires, limit losses and provide for the safety of emergency responders and citizens. A safe but aggressive initial attack is emphasized, based on predicted and observed fire behavior, fuels, topography and weather.
3. Initial attack and extended attack operations will receive highest priority. Incidents may be directed to release resources on short notice in support of this priority and will be expected to respond within stated timeframes. The intent is to deploy qualified wildland fire leadership and supervision to the initial phase of an incident and place them in the best position to conduct suppression actions.
4. Wildland fire suppression actions will be selected based, first, on provision for firefighter safety. That satisfied, actions will then be based on minimizing suppression cost, resource loss and environmental damage, consistent with resource management objectives for the values to be protected.
5. Resource allocation decisions and priority ranking determinations will be based on information reflected in an incident situation analysis. Incident management teams may be directed to modify strategies due to resource shortages.
6. Accurate and timely submission of the Incident Status Summary (ICS 209) is essential during the prioritization process and will also affect allocation decisions.
7. **Class A-B Size Fires (Complexity Level – Type 4 & 5 Fires)**--For small and/or non-complex fires a written plan is optional but should be submitted when requested. Only the unit Fire Management Officer or designated representative may determine not to write a plan. Written mop-up and patrol plans are a good

tool for communicating planned actions to incident personnel, and are recommended, especially in extended mop-up situations. For multiple small fires such as a lightning bust or string of railroad fires, one plan can be written to cover all fires. This plan, however, must address actions required to assure **all** the fires will be aggressively mopped up/patrolled until they are **all 100% dead out**. All written mop-up and patrol plans must be approved by the unit supervisor or his/her designated representative.

8. **Class C and Larger Size Fires (Type 3 or larger fires)** --A mop-up and patrol plan, commensurate for the situation, must be prepared and updated as necessary for all fires that are Class C or larger in size. The unit is responsible to prepare the plan unless an incident management team is assigned to the fire. The line officer will approve all plans.

B. PRIORITIZATION CRITERIA

1. Life
 - a. Protection of human life.
2. Improved Property
 - a. Support and assistance to structure fire protection partners under established agreements. Wildland fire suppression agencies, under these circumstances, have the responsibility to prevent wildland fire from spreading into areas of structures and to assist in protecting structures from advancing wildfires. A unified command organization or a coordinated delegation of authority between jurisdictions will normally guide these efforts.
 - b. Outside of established local government structure fire departments, or where no structure protection agreements are in place, allocation of suppression resources will be weighed commensurate with natural resource values to be protected.
3. Natural Resources
 - a. Wildland fire suppression allocations will be commensurate with the values to be protected.

C. PLANNING

DNRC line officers (Agency Administrators) and incident commanders are authorized to take whatever actions are necessary and economically

feasible to maintain control of fires until those fires are declared **100% dead out**.

It is not a requirement that all fires be **mopped up 100%**. Where an approved written plan is in place, perimeter mop-up or other options may be acceptable. The mop-up guidelines contained in the Prescribed Fire Manual (400) are appropriate for use on all fires which are the responsibility of DNRC. DNRC requires that all incident commanders aggressively pursue 100% mop-up of assigned fires unless otherwise directed in a written and approved mop-up and patrol plan.

The primary objectives of all plans are to reduce the risk of escape of DNRC fires to the lowest acceptable level, and to manage needed resources in a manner such that the planned actions are carried out as efficiently and economically as possible. Plans must be kept current with changing conditions on a daily basis.

All mop-up and patrol plans should take the following items into consideration:

1. Values at risk inside and outside the control line.
2. Current and predicted weather conditions.
3. Site conditions in areas adjacent to the fire (fuels, topography).
4. Access to the fire, travel time, etc.
5. Manning class level, personnel available, etc.

D. SPECIAL CONSIDERATIONS

1. Fires in wildland urban interface (WUI) areas are the highest priority fires for mop-up and patrol actions. WUI fires (even in patrol status) may have priority over initial attack of new fires outside any WUI areas if there is risk of the WUI fire escaping control. Planning for mop-up and patrol for a WUI fire should always consider a worst-case weather scenario.

It is acceptable to allow landowners/lessees to complete mop-up and patrol of fires resulting from their own actions on their deeded/leased land if risk of escape is minimal. If it is desired to allow a landowner or lessee to perform any of these functions, a written agreement between the landowner/lessee and DNRC is required. The Mop-up and Patrol Agreement (F-915) located in the Fire Forms Manual (1800 Manual).

4. DNRC may use Engine Operators (ENOP) on engines when the engine is included in a Strike Team and a qualified Strike Team Leader Engine (STEN) is assigned and in charge of the Strike Team. Not more than two engines in the strike team can be

manned by Engine Operators. ENOP may also be used when the engine is paired up with another engine that has a qualified Engine Boss (ENGB) assigned. The Engine Boss will provide direct supervision to the engine staff with an ENOP.

These engine configurations will only be used in area dispatches and are not for national mobilization. The receiving agency or organization will have the option to accept or reject the use of engines that are not manned by fully qualified Engine Boss (ENGB) assigned. The Engine Boss will provide direct supervision to the engine staff with an ENOP. For qualification requirements for ENOP see Firefighter 1 (FFT1) in the 310-1, Wildland Fire Qualification System Guide.

932 LENGTH OF COMMITMENT, WORK/REST, AND REST AND RECUPERATION GUIDELINES

The following guidelines have been established for work/rest, length of commitment, and rest and recuperation for all DNRC employees during fire suppression, and All-Hazard activities on and away from the home unit (note some exception below, “**Managing Days-off on the Home Unit**” page 930-5). These guidelines apply to DNRC crew, overhead, and support personnel that may be assigned to any suppression activity, whether the responsibility of the State or in support of other agencies.

A. WORK/REST, LENGTH OF ASSIGNMENT, AND DAYS OFF

To maintain safe and productive incident activities, incident management personnel must appropriately manage work and rest periods, assignment duration and shift length for personnel, including casuals (EFF/AD), contracted crews and EERA resources.

To assist in mitigating fatigue, days off are allowed during and after assignments. If necessary to reduce fatigue, the Incident Commander (IC) or Agency Administrator (Line Officer, Fire Leadership, and Duty Officers) (incident host or home unit) may provide time off supplementary to mandatory days off requirements. The Agency Administrator has the authority to provide a day off if needed, in addition to mandatory day off requirements.

1. Work/Rest Guidelines

Work/rest guidelines should be met on all incidents. Plan for and ensure that all personnel are provided a minimum 2:1 work-to-rest ratio (for every 2 hours of work or travel, provide 1 hour of sleep and/or rest).

Work shifts that exceed 16 hours and/or consecutive days that do not meet the 2:1 work/rest ratio should be the exception, and no

work shift should exceed 24 hours. However, in situations where this does occur (for example, initial attack), incident management personnel will resume 2:1 work/rest ratio as quickly as possible.

The intent of the guidelines is to manage fatigue, insure the safety of firefighters, and provide flexibility for IC's, Fire Leadership and Line Officers managing initial attack, extended attack, and large fires. The guidelines are designed to ensure that for every 2 hours of work or travel, 1 hour of time off should be provided within a 24-hour period. It does not matter when the 24-hour period starts; all time recorded on the clock is counted as hours of work; time off the clock is counted as hours of rest, including meal breaks.

The direct fireline supervisor, Incident Commander or Agency Administrator (Line Officer) must justify work shifts that exceed 16 hours and those that do not meet the 2:1 work to rest ratio. Justification will be documented in the daily incident records. Documentation shall include mitigation measures used to reduce fatigue. The **Documentation of Length of Assignment Extension Requirements** found in **Annex D** of this Manual is an acceptable method of documentation.

The Time Officer's/Unit Leader's approval of the Emergency Firefighter Time Report (F 317 - OF-288), or other agency pay document, certifies that the required documentation is on file and no further documentation is required for pay purposes. Agency driving policies and special licensing requirements will be followed.

The work/rest guidelines do not apply to aircraft pilots assigned to an incident. Pilots must abide by applicable Federal Aviation Administration (FAA) guidelines or agency policy if it is more restrictive.

Incident management personnel should address work and rest management in performance evaluations and ratings for all overhead, crews, and support personnel.

DNRC personnel accepting fire suppression assignments will meet the criteria specified within the Northern Rockies Interagency Mobilization Guide and the National Interagency Mobilization Guide on length of incident assignments. The length of incident assignments applies to both **in-state and out-of-state** tours of duty. To provide for safe, efficient, and effective support to wildland fire operations the following interagency policy on length of assignments has been adopted by DNRC. The policy applies to ALL firefighters, overhead, dispatchers, and support personnel.

R&R and Work Rest guidelines as outlined in the Interagency Incident Business Management Handbook remains in effect for DNRC employees with exceptions noted within this section.

2. **Length of Assignment**

a. **Assignment Definition**

An assignment is defined as the time period (days) between the first full operational period at the first incident or reporting location on the original resource order and commencement of return travel to the home unit.

b. **Length of Assignment**

Standard assignment length is 14 days, exclusive of travel from and to home unit, with possible extensions identified below.

Time spent in staging and preposition status counts toward the 14-day limit, regardless of pay status, for all resources, including incident management teams.

3. **Day Off**

After completion of a 14-day assignment and return to the home unit, one day shall be taken off to ensure that the intent of the work/rest guidelines are met. Every effort should be made to achieve the day off within the individual's regularly scheduled days off.

Agencies will apply holiday pay regulations, as appropriate. A paid day off is recorded on home unit time records per agency requirements.

Casuals (EFF/AD) are not entitled to a paid day(s) off upon release from the incident or at their point of hire.

Contract resources are not entitled to a paid day(s) off upon release from the incident or at their point of hire.

All length of assignment rules applies to aviation resources, including aircraft pilots, notwithstanding the FAA and Agency day off regulations.

4. **Assignment Extension**

Prior to assigning incident personnel to back-to-back assignments, their health, readiness and capability must be considered. The health and safety of incident personnel and resources will not be

compromised under any circumstance. Assignments may be extended when:

- Life and property are imminently threatened;
- Suppression objectives are close to being met; or
- Replacement resources are unavailable, or have not yet arrived.

Upon completion of the standard 14-day assignment, an extension of up to an additional 14 days may be allowed (for a total of up to 30 days, inclusive of mandatory days off, and exclusive of travel). Regardless of extension duration, **two mandatory days off will be provided prior to the 22nd day of assignment**. When personnel are required to take a mandatory day off, which falls on their normal day off, there will be no pay compensation.

Contracts, I-BPAs and Emergency Equipment Rental Agreements (EERA) should be reviewed for appropriate pay requirements and length of assignment. If the contract, I-BPA, or EERA does not address this, the incident Finance Section Chief or the procurement official should be consulted as to whether compensation of a day off is appropriate.

a. Single Resource/Kind Extensions

The Section Chief or Incident Commander will identify the need for assignment extensions and will obtain the affected resources concurrence. The Section Chief and affected resource will acquire and document the home unit supervisor's approval.

The Incident Commander approves the extension. If a geographic or national multi-agency coordinating group (GMAC/NMAC) is in place, the incident commander approves only after GMAC/NMAC concurrence.

The home unit supervisor and affected resource will be advised and must concur prior to assignment extension.

b. Incident Management Team Extensions:

Incident management team extensions are to be negotiated between the incident Agency Administrator (Line Officer), the Incident Commander and the GMAC/NMAC (if directed).

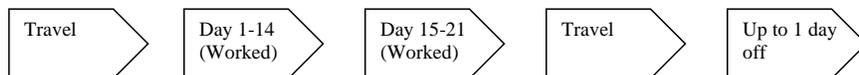
The Assignment Extension form can be found in the Appendix "D" of this manual. A copy of documentation should be attached to time sheets.

Standard 14-Day Scenario:

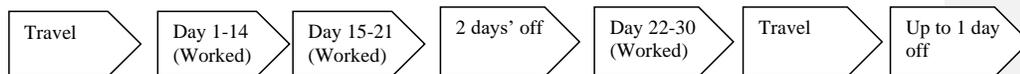


After completion of a 14-day assignment and return to the home unit, 1 mandatory day off will be required. The day off must occur on the calendar day immediately following the return travel.

21-Day Scenario:



30-Day Scenario:



Upon completion of the standard 14-day assignment, an extension of up to an additional 14 days may be allowed (for a total of up to 30 days, inclusive of mandatory days off and exclusive of travel).

IV. Managing Days-off on the Home Unit:

1. Managers and supervisors are responsible for work schedules, and managing days off, for initial attack, dispatch and support personnel during extended fire suppression and all-hazard incident situations.
2. It is a critical responsibility of every manager and supervisor to monitor employees, and if necessary, to provide a day-off (compensated or scheduled), prior to 14 consecutive days of work.
3. Indicators of the need for a day-off include long shifts, as well as observation of the physical and mental condition of the employee.
4. One day off after 14 consecutive days' work applies to the home unit. However, in conditions of extreme fire-suppression or all-hazard activity, managers and supervisors may extend the work limit from 14 to 21 days before a day off. Approval and justification

documentation is required by, a Unit Manager, and or an Area Manager, Bureau Chief, or Division Administrator. **(Documentation should include a written justification for reason(s) for going 21 days, along with fatigue mitigation for involved employees.)**

B. REST AND RECUPERATION

As a general rule, regular Department employees and emergency firefighters are not guaranteed a specific number of days of paid rest and recuperation (R&R) within an emergency incident. Incident Commanders and agency officials responsible for the incident will utilize R&R to give employees proper rest so they remain productive, physically capable, and mentally alert to perform their jobs safely. The timing and length of R&R may vary depending upon the fatigue level and work requirements of crews.

1. **Rest and Recuperation During Incident**--When facilities (including incident base camp or command post) are provided for R&R, time spent at these facilities by regular employees is compensated only to that extent needed to complete the guaranteed hours for that calendar day.

NOTE: On the Form OF-288, Emergency Firefighter Time Report, record the time with "RR" above the daily hours. Home unit timekeepers shall record R&R time as base hours if the R&R occurs during the employee's scheduled workdays, or as overtime hours if the R&R occurs during the employee's normal days off.

An employee who leaves an R&R facility for personal reasons not related to R&R, rather than official reasons, shall be placed in an off-duty status.

Record the total hours of R&R the employee actually spent at the facility. Indicate on the Form OF-288 in the "remarks" block when the employee was released for personal reasons. The home unit shall charge leave if the employee has not fulfilled the basic tour (such as 40-hour week and so forth). Do not charge leave when an employee is on overtime.

R&R facilities should provide the following where practical:

- a. Eight (8) hours of uninterrupted sleep.
- b. Facilities for showering and washing clothes.
- c. Commissary or other sources to secure essential items.

- d. Access to a public telephone for personal calls.
- e. Smoke-free environment.

933 INCIDENT SITUATION ASSESSMENT REQUIREMENT (STANDARD)

Fire staff and line offices at all levels must determine complexity of an incident and assign qualified personnel as needed. More than 95 percent of all wildland fires fall within the low range of complexity and are controlled with Initial Attack and reinforcement forces. These are referred to as Type 3, 4, and 5 Incidents in the Incident Command System; the involved agencies have the latitude to agree on qualifications that meet their needs within the local operating area for incidents at the level of Type 3, 4, and 5 incidents.

Following are guidelines to assist managers in determining incident complexity. These should be used in conjunction with the NWCG'S "Organizational Needs Assessment". The guidelines are presented in order of ascending complexity and describe the fire suppression response and the fire organization that is appropriate to the particular situation. The Type 5 incident is the lowest level of complexity recognized in the NWCG Wildland Fire Qualification System, and Type 1 is the highest range. The Type 1 Incident combines in the Multi- Division and Multi-Branch classification as described in the NWCG Wildland Fire Qualifications Guide (310- 1)."

It is required that an Incident Situation Assessment (ISA) be prepared by the DNRC responsible line officer or their designated representative for Type 3 and higher complexity fires. Line Officers may get an electronic or hardcopy of this form from their Area Fire Program Managers. The line officer shall promptly organize and implement an appropriate suppression response for each escaped fire. An escaped fire is defined as a fire which has exceeded, or is anticipated to exceed, initial action capabilities or fire management direction. The incident situation assessment will be reviewed and revised as needed until the fire is controlled.

For Type 3 Incident and above, Line Officers will complete the DNRC Incident Situation Assessment. If the fire is a joint jurisdictional fire with a federal agency, the Line Officer may utilize the federal Wildland Fire Decision Support System (WFDSS) process to meet the DNRC requirement for an Incident Situation Assessment. If the WFDSS is utilized, a copy documenting the decisions that were made must be retained by the Line Officers and filed with the fire package.

A. INCIDENT SITUATION ASSESSMENT

For a copy the Montana DNRC Incident Situation Assessment, refer to the following web page link:

<http://dnrc.mt.gov/divisions/forestry/fire-and-aviation/fire-business/line-officer-toolkit>

934 DELEGATION OF AUTHORITY

The transfer of authority for suppression actions on a fire is done through a delegation of authority from the agency administrator (Line Officer) to the incident commander. A written delegation of authority will be done on all Area Command, Type 1 and 2 incidents and on most Type 3 incidents. Line Officers have the discretion to delegate authority for Type 3 incidents verbally or in writing. An Incident Management Team (IMT) may manage suppression actions on a fire only after receiving a signed delegation of authority from the agency administrator (Line Officer). This procedure facilitates the transfer of command for the incident between management levels.

The delegation of authority will contain specific, measurable objectives to be accomplished by the IMT, as well as any limitations to that authority. Measurable objectives will provide both the IMT and agency administrator (Line Officer) a means for continual evaluation and necessary adjustments as the incident progresses.

- A. A Letter delegating authority and assigning responsibility should be issued whenever an Incident Commander is assigned to manage an incident. As situations change, it may become necessary to reissue or update the letter of delegation. Normally, the letter of delegation is issued prior to the Incident Commander taking over the responsibility for management of an incident.
- B. Letters of delegation should be specific enough to ensure the Agency Administrator (Line Officer) gets the desired results, but broad enough to let the Incident Management Team perform their management duties. Any constraints that are necessary for the host Unit to meet resource management objectives, avoid political problems, create unacceptable public concern, generate unacceptable environmental impacts or jeopardize personnel safety should be included in enough detail for a complete understanding by the Incident Commander. Where the Incident Management Team can be given the latitude to carry out the Agency Administrator's (Line Officer's) direction within the Incident Situation Assessment, further constraints only inhibit and reduce the team's management effectiveness.
- C. Similar to delegating any authority, only the person who is responsible can delegate for the management of an incident. In situations where an Agency Administrator (Line Officer) delegates authority to someone other than the Incident Commander (for example, to an Area Commander) then the Area Commander will be responsible for issuing letters of delegation to Incident Commanders.

- D. The following are elements to consider including in letters of delegation of authority to Incident Commanders. Only those elements that are specifically necessary should be included.
1. Identification of Agency Administrator's (Line Officer's) representative.
 2. Identification of suppression objectives in priority.
 3. Identification and explanation of the initial attack responsibilities.
 4. Identification of Resource Advisor and his/her role.
 5. Identification of suppression activities that require Agency Administrator (Line Officer) approval and which have been delegated to the Incident Commander.
 6. Identification of the basic documents that should guide the management of the incident.
 7. Identification of cost constraints and guidelines not covered in the.
 8. News release approval and incident information guidelines and limitations.
 9. Identification of constraints or guidelines on firefighting methods and resources
 10. Identification of procedures in dealing with threats to other jurisdictional property.
 11. Identification of any "Special Management Areas", legal, or policy constraints that may be applicable.

935 LOCAL GOVERNMENT FIRE SUPPRESSION

Fire suppression costs continue to escalate along with the increasing value of structures and natural resources. Due to a diversity of values within each county, and to the escalation of suppression costs, it has become necessary to develop suggested procedures for suppression of fires that occur within cooperative fire counties.

These procedures are intended to be interpreted and altered by the land office to fit specific local situations that are encountered. These procedures are also meant to assist state and county personnel in determining the actions to follow for suppressing wildfire in a manner that is economically feasible in relation to values at risk.

A. COUNTY COOPERATION

Individual land offices and dispatch centers work locally with the counties lying within their respective area of responsibility. Requests for personnel and equipment from outside of the land office area for use on county project fires will be made to the zone coordination center.

The use of available county personnel and equipment will utilize the following guidelines:

1. **Mobilization Procedures**
 - a. Land office or dispatch center contacts each county as to the number and types of equipment and personnel available for dispatch outside of their county boundaries. based on an approved drawdown plan. Mutual aid assistance to adjacent counties will not be considered for State reimbursement.
 - b. Each county maintains a list for its total resources with a main contact listed.
 - c. All county resources within land office area boundaries are considered local for zone coordination.
2. **Conditions of Hire**
 - a. To qualify for payment within its legal jurisdiction, not including severity, the local government force must be fully committed (the situation has surpassed the jurisdiction's capabilities and all firefighting resources have been exhausted), have exercised local mutual aid resources as much as reasonable, and have been granted a DNRC County Assist. The criteria for fully committed and commitment of mutual aid resources will vary by county, by time frame, resource availability, activity level, and jurisdictional commitment and

is to be determined by the local DNRC Area/Unit involved. Refer to the Mobilization of Local Government Firefighting Resources Guide (Umbrella Document).

Also, DNRC-owned equipment placed in the county under the coop program will not be rented by DNRC for fires within the county.

- b. DNRC County Fire Advisor and/or Agency Representative recommend additional resources (no reimbursement for prior actions of mutual aid counties).
- c. All personnel will be members of a county and/or emergency service organization.
- d. All personnel will have a basic level of wildland fire training, except for specialized resources (e.g., EMS). Under NIMS, DNRC will accept the local government personnel's training qualifications and physical fitness program and/or requirements up to single resource boss.
- e. DNRC will certify all qualifications for strike team leader and above (refer to the 1100 manual).
- f. All county forces will be organized under the incident command system.
- g. All equipment will be inspected and hired under an "Incident Rental Agreement" (preferably preseason sign-up in conjunction with county inspections).
- h. All personnel and equipment will be paid per rates listed in the "NWCG Interagency Incident Business Management Handbook," unless covered under a separate agreement. Only normal use items (i.e., gas, oil, etc.) and repair and maintenance charges will be made against DNRC-owned equipment that is brought in to assist another county by county forces (Refer to Chapter 50 of the Interagency Incident Business Management Handbook).
- i. A DNRC Agency Representative and/or County Fire Advisor may be required with use of county personnel.

B. COUNTY FIRE SUPPRESSION

1. **Provide Close Coordination**

Land offices should continue to develop close cooperation and coordination with the counties to ensure an early and even flow of intelligence on fire conditions. The success of any limited action support program lies in early assistance by the state to reduce the need for maximum efforts later.

The following are areas where close coordination between the county and the state may become necessary:

- a. The ignition of fires should be reported to the DNRC land office if they could feasibly overwhelm the county forces or should be reported if single fires are still burning uncontrolled 24 hours after attack by the county, or when significant resources are requested from adjacent counties.
- b. The ignition of any wildfire in a high hazard area that has the potential of developing into a serious fire situation should be reported by the county to the local land office. The seriousness of a fire situation in these areas may be dependent upon a variety of factors that exist at the time of the fire occurrence: weather conditions, prior commitment of county forces, or suppression force capability.
- c. The ignition or spread of a wildfire onto State ownership should be reported.

2. **Monitor Local Fire Conditions**

The land office should closely monitor county fire suppression actions any time a fire situation has been reported by the cooperator. This monitoring should be geared to the type of situation and the degree of hazard. The land office should monitor by checking periodically with the County Firewarden. If the fire situation appears to be expanding, the Area could monitor by aircraft or a direct visit to the fire. This monitoring should be done as soon as necessary and normally with the County Firewarden or his assistant. Continue direct monitoring until the fire situation is normalized. Provide weather data to the county via phone or hard copy and request spot forecasts for the fire. The DNRC local land office should monitor the fire situation by direct observation via fixed-wing aircraft, helicopter or by a visit to the fire. Such expenditures may be paid for by DNRC in assisting the county and do not require an official request from the County Commissioners to the State Forester. An area fire and accounting number will be required once DNRC costs are incurred, along with the necessary

reporting of actions to the state coordinator at the NRCC. Follow-up paperwork is also required, such as a fire incident report and narrative.

Project fire organizations with overhead teams, organized fire crews, and supporting elements should be made available upon request and approval by the DNRC Line Officer.

Specific fire suppression tactics are suggested to combat county range fires where practical. This may be in the form of an engine wetline or a dozer line with burnout. Both may be utilized on many of the finer fuel types found throughout the eastern counties. Both methods of fireline construction have a moderate amount of risk involved, but this is usually offset by the advantage of speed in line building, with a small number of personnel, at lower or reduced costs.

The engines/tenders that we normally provide to the cooperative counties have proven to be a very effective piece of firefighting equipment on the mixed conifer/grassland fuels found in many cooperative counties. Therefore, their use should be stressed wherever practical.

- a. **Suppression Assistance**--Department assistance should normally be aimed at:
 - 1) County Fire Advisor.
 - 2) IMT and /or Command and General Staff.
 - 3) Specialized fire personnel trained in burnout and equipment use.
 - 4) Initial attack and/or assistance by DNRC forces where DNRC direct protection borders areas of county protection responsibility.
 - 5) Type I and II Interagency Incident Management Team.

3. **Suppression Assistance in Circumstances Beyond County Capabilities**

DNRC assistance will consist of whatever personnel and equipment is required by the County Fire Incident Commander to control the fire agreed to by the County and DNRC Line Officers. DNRC and cooperating agency fire suppression forces will be used to ensure control of the fire. DNRC ordered forces will be withdrawn from the fire when agreement has been reached between the County Fire Incident Commander and the state that

the county is capable of handling the remainder of the fire activities adequately. DNRC will provide a line officer to work in a unified effort with the county line officer.

4. **Provide Advice at an Early Stage to Reduce the Need for Major Support**

Local DNRC land office personnel normally handle County Fire Advisor duties. When the monitoring of fires indicates that the situation may become serious, additional county fire advisory aid may be requested. Selected DNRC personnel will be available to the land offices that may be experiencing fire problems in a cooperative county or counties. These personnel will be referred to as "County Fire Advisors" and will have prior training and experience in both timber and grassland fire behavior. They will also be familiar with the county cooperative fire program and the use of local government forces.

A County Fire Advisor may be requested by the land office, through the zone coordination center, any time the land office feels that advisory assistance is needed. The County Fire Advisor is not to relieve the Area Manager or his representative of their duties and responsibilities, but is to advise and assist them and the county during periods of heavy or critical fire loads. They will make specific recommendations as to personnel and equipment needed on fires in the county and may give advice on how to better utilize the existing forces.

A request should immediately be placed by the DNRC land office for a trained County Fire Advisor or for an incident management team if direct monitoring indicates a potentially dangerous fire situation. We must attempt to have advisory personnel in place early. A written request from the County Commissioners is not needed for the Department to provide this advisory assistance.

5. **Tailor Suppression Assistance to the Values at Risk**

Limited and specialized assistance may be provided to a cooperative county by the land office on verbal concurrence of the County Firewarden or County Commissioners. **(A request for project fire assistance must be from the County Commissioners and followed up in writing within 48 hours.)** It should be well understood by the county that DNRC resources are available to them at all times on a limited assistance basis. This assistance may be with personnel and/or equipment.

6. **General Guidelines**

The following points have been listed as a general guideline for Department overhead and land office personnel that are assisting cooperative counties in fire suppression. In addition, refer to the 600 Manual, Section 604 – Appendix #2 – Cooperative County Fully Committed Guidelines.

“Fully Committed” is a term used in relation to the buildup of county-committed resources (equipment and personnel) to a wildland fire incident within that county, in preparation to asking for State assistance. Montana’s counties contain a wide spectrum of capabilities, which makes developing a one-size-fits-all, inclusive statement defining when a county is fully committed all but impossible. Most Land Offices, and some of their Co-op. Counties, find themselves having to make this judgment several times per year. Following are some general guidelines highlighting aspects of the State/County Cooperative Fire program as they pertain to commitment levels, as well as a “tickler” list to aid a Land Office representative, and the County’s representative, in making this determination.

The first thing to understand is that a county provides the necessary wildland fire protection afforded through the State/County Co-op. Fire program with a system of firefighters (primarily volunteers) from various Rural Fire Districts, Fire Service Areas, Volunteer Fire Companies, and County Rural Fire Departments. These Guidelines recognize the duty and responsibility of these same fire organizations to continue to provide standard and adequate fire protection within their respective legal jurisdictions, even during a county-wide wildland fire incident. Further, it is understood and accepted that any policy encompassing all possible situations is unrealistic and acknowledges that the merits of a request for state assistance must be jointly assessed and evaluated by the Incident Commander(s), the County Firewarden (or another county representative acting for the County Commissioners), and the assigned DNRC representative, on a case-by-case basis. County-wide mutual aid agreements, mapped initial attack and fire protection areas, and fire department drawdown plans are some of the aids that need to be available, and annually updated, to allow this group to assess the capabilities of a particular county. Signed mutual aid agreements with adjoining counties are valuable tools a county can use to maintain their ability to respond to all legally mandated incidents. When, or if, these out-of-county mutual aid resources enter a paid status after State assistance is given is dependent solely on the judgment of the assigned DNRC representative and is covered in the Mobilization of Local Government Fire Forces document.

Following is a list of some things that the County should consider doing prior to a wildland request for State assistance:

- Department(s) with jurisdiction are committed presently, and for the duration of the incident.
- Other divisions of county government are committed as necessary:
 - County Road Department.
 - Law Enforcement.
 - Search and Rescue (S&R).
 - Disaster and Emergency Services (DES).
- Mutual Aid resources within the county are utilized as per annual operating plan(s):
 - Drawdown plans implemented.
- All DNRC equipment on loan is committed to incident(s) or other initial attack responsibilities.
- County equipment and personnel are committed to incident(s) or other initial attack responsibilities as appropriate.
- Signed Mutual Aid Agreements with adjoining counties, state agencies, federal agencies, or other fire jurisdictions invoked as necessary. Knowing these other agencies might be committed to their own incident(s), this listing is offered for consideration when reasonably available.
- Consideration given to invoking the County 2-Mill Levy, per 7-33-2209 MCA, and/or
- Consideration given to invoking the County 2-Mill Levy, per DES 10-3-405 MCA. The County usually has to declare emergency or disaster in this case.

While most incidents unfold in a linear fashion, starting small and growing larger in a predictable manner, some do not. Weather, fuels, and other factors can cause an incident to grow exponentially, from small to complex, in a very short time. Sustained high fire dangers, Haines Indexes 5+, Lightning Activity Levels (LAL's) of 5, Burning Indexes (BI's)/ Energy Release Components (ERC's) above the 90th percentile, and other large incidents in the county or state could cause an emerging incident to progress past the point of possible containment with the county's resources, or lower the potential for the county to respond

adequately. (In cases such as this, the decision time to involve other cooperators and seek State assistance will naturally be compressed. In these cases, it may not be possible to use the above criteria to judge "fully committed.") Also, as fire season conditions worsen, some pre-planning of the State assistance process needs to occur. Several forms of State assistance may be given to a county, before an "official" request is processed, in order to keep an incident from becoming "project" size, after which time an incident becomes very dangerous and expensive. For example, mutual aid response by DNRC resources, the use of retardant or other resources/supplies which the counties don't have access to, should be considered if conditions warrant. It might help to set up some "trigger" points understood by all parties when such actions would occur.

The State/County Co-op Fire program attempts to strengthen the initial attack capabilities of a county's fire forces by having the State (DNRC) provide training, equipment, and help in organizing fire protection. The State additionally provides, on an "as needed" basis, technical assistance in the form of County Fire Advisors, fixed and/or rotary wing air support, or other non-traditionally provided resources. In turn, the County agrees to initial attack all fires on State and private land within the county which are not otherwise protected. The County maintains responsibility for all such county fires, even after the request for State assistance has been approved. The County remains as a Line Officer, in consultation with the local DNRC Land Office representative overseeing the State's involvement. The Jurisdiction can delegate management authority for specific tactical and support operations needed to mitigate an incident, but final responsibility rests with the jurisdiction. The County must also maintain a presence throughout the incident(s) duration. At some agreed point after the incident's containment and control, the County will be expected to take back operational control of the incident until it's declared out. This point will be jointly agreed to by the I.C., the DNRC representative with authority, and the County Firewarden (or another representative acting for the County Commissioners). State involvement after this point will again be at the discretion of the local DNRC Land Office representative, in consultation with the County Firewarden.

- a. The initial order for personnel and equipment will be approved by the Land Office. If the land office is unsure as to needs, a County Fire Advisor should be requested immediately to assist.

- b. A County Assistance Team will be used on project county fires when practical. Due to limited personnel and prior commitments of team members, other trained overhead team members may be used. Assignment will be on a case-by-case basis.
- c. A land office that is experiencing county fire problems will assign at least one individual as a County Fire Advisor and one individual as the Agency Representative. Both should be from the local land office or be extremely knowledgeable of land office operations and the local community.
- d. The individual acting as the Agency Representative will work closely with all personnel to maintain coordination and a good working relationship. All overhead fire teams should maximize coordination with the landowner, local volunteers, county personnel and State personnel that are involved with the suppression effort.
- e. All fire suppression methods considered for use during project fire operations will be coordinated with the landowner, County Fire Incident Commander and the Area Manager or his/her representative (line officer). If adjoining landowners are threatened, they should also be contacted and informed of proposed tactics. The decision on the use of specific fire tactics to be employed on the fire will continue to remain with the County Fire Incident Commander. Whatever tactics are decided upon, the saving of lives, structures, and high value property will be of paramount importance, and should be stressed before a final decision is made on the method to be used in the suppression action. Documentation in writing, stating basis for suppression method utilized, is advisable. Such documentation may be helpful later, if there is a question on the tactics utilized in suppressing the fire.
- f. The county will maintain a fully committed status throughout the duration of the fire or fires. County crews and county equipment should be made available to the fire, if not committed on other fires. Requests for crews and equipment will originate with the County Fire Incident Commander. If the request for county crews and equipment is not promptly acted upon, the Agency Representative or Area Manager will work with the County Commissioners to fill the request. County crews and equipment on the fire will not be paid by the state. County equipment should be utilized, where practical, before private equipment is rented for use on the fire.

Any equipment voluntarily furnished by the landowner for fire suppression upon their lands or upon adjacent lands will not be

hired onto the fire by the state. Such equipment should be utilized as long as the landowner is willing to provide it in a voluntary capacity. If the landowner is unwilling to voluntarily provide specific needed equipment upon request, then we may hire the needed equipment to meet suppression objectives.

- g. If a volunteer fire department or other volunteers are helping in the suppression activity, a coordinated effort should be made by the County Fire Incident Commander to maintain volunteers on the fire through split 24-hour shifts. If specialists such as sawyers, dozer operators, truck drivers, etc., are needed on the fire, they can be put on the state payroll.
- h. An Agency Representative should be ordered as part of any interagency team that may be on a county fire and/or where the potential exists for county resources to become involved in the suppression effort.
- i. Any fires occurring in areas of cooperative county protection should be monitored closely where fire spread may cross agency protection boundaries. Fires spreading across agency boundaries may involve sharing of costs associated with the suppression efforts. Agency representatives should be consulted as soon as a threat is determined on their jurisdiction.

C. GUIDELINES FOR COOPERATIVE LAW ENFORCEMENT AGREEMENTS

1. **Reimbursement for Incident/Fire Emergencies**

During emergencies, the DNRC may reimburse the Cooperator for the costs incurred as a result of providing requested assistance. Reimbursement will be limited to actual costs associated with the declared emergency and which, have been ordered by the DNRC, with an assigned Resource Order Number. The DNRC also agrees to reimburse the cooperator for any additional overtime expenses incurred by the Cooperator as a direct result of officers working fire assignments under this Agreement. Reimbursement requires Line Officer approval. Costs incurred prior to issuance of a Resource Order may not be reimbursed.

Reimbursable Services	Non-reimbursable Services
Fire Camp Security	
Maintain Roadblocks for Fire Equipment or Fire Camp Security	Normal Cooperative Activities
Equipment Security	Normal Traffic Control (Example--Public Safety Mitigation resulting from smoke, landslide, vehicle accident, etc).
Traffic Control Requested by the DNRC (Example--Incident Operational Activities such as burnouts, helicopters hovering near roads, etc.	

Guidelines:

If the activity is not documented, it won't be reimbursed. Be sure to document what assistance is requested, why it was requested, who requested it, and what agreements were made regarding reimbursement.

Is there a current cooperative law enforcement or mutual aid agreement between the local sheriff's department and land use agencies? If so, review it for sections dealing with fire emergencies or special enforcement situations.

Situation	Guideline (s)
1 Initial Response	Generally, the responsibility of each participating agency or department, and will not be reimbursed unless there is an advance written agreement stating otherwise. Check your co-op or mutual aid agreement.
2 Activities begun during initial response are continued.	Establish contact with the incident management team to determine what activities they feel must be continued as part of the suppression/protection effort (if any). Initiate a resource order or service agreement.

	Situation	Guideline (s)
3	Incident management team requests your assistance with public safety functions.	Document the request, including what functions are needed, why, who will perform them and who will pay for them. Initiate a resource order or service agreement.
4	Local authorities feel some public safety functions are necessary, but the incident management team does not.	The decision to reimbursement for costs under this situation will be made by the Line Officer.
5	Transition between incident management teams.	Review current requests, agreements and orders with the new team. Revise as necessary.

Be very specific with agreements and resource ordering. If non-sworn personnel such as dispatchers, support staff and search & rescue will be used in the field you will need to determine in advance if related expenses are allowable. The same goes if you expect reimbursement for equipment use.

2. **Reimbursement for Enforcement of Restrictions And Closures**

Restrictions and closures are an emergency administrative action initiated for fire prevention and public safety purposes. They are normally reinforced by the issuance of an emergency proclamation or disaster declaration by principal executive officers (governor, board of commissioners or mayor).

Review current cooperative law enforcement or mutual aid agreements for any language addressing this issue.

If the activity is not documented, it may not be reimbursed. Be sure to document what assistance is requested, why it was requested, who requested it and what agreements were made regarding reimbursement.

Requests for assistance must come from the land use agency or interagency dispatch center in your area. If in doubt, meet with the agency administrator or designated representative.

3. **Montana State Inmate Crews Assigned to Incidents Within Your Jurisdiction**

The county sheriff will be notified in advance of an inmate crew being assigned to his or her jurisdiction.

If you have questions about the crew's make-up, selection process, security arrangements, etc. you may contact their agency representative assigned to the incident or the Northern Rockies Coordination Center Duty Officer at (406) 329-4880

936 WILDLAND AND STRUCTURAL FIRE PROTECTION

A. OVERVIEW

The statutory fire protection responsibility for Montana's natural resources and structural developments has been assigned to various federal, state, and local government agencies. By law, agencies have responsibility for protecting the natural resources of the state. Local government agencies may be authorized or directed by state statute to provide fire protection to both natural resources and improvements/structures. Within this text, the terms structure and improvements are interchangeable and include buildings, enclosed structures, vehicles, vessels, aircraft, or like properties.

The distinction between natural areas and structural developments has been well defined in the past. However, these differences have become more vague with the encroachment of structural developments into what were exclusively forest or wildland areas. This mixture of wildlands and developments has become quite extensive throughout Montana and has been labeled the "Wildland Urban Interface (WUI)."

B. WILDLAND FIRE PROTECTION:¹

The Department of Natural Resources and Conservation's mission has been the protection of the natural resources of the state from wildfire. DNRC's primary mission is to protect state and private Large tracts of federal lands within DNRC protection boundaries are also being protected

¹**MCA 76-13-104. Functions of the department.** (1) the department has the duty to ensure the protection of land under state and private ownership and to suppress wildfires on land under state and private ownership..

through contract or offset. Although "forest fire protection" has been our primary responsibility, this responsibility has been redefined to a broader one of "wildland fire protection."² Wildland fire protection is a more inclusive term for both forest and range lands and more closely defines our role as a natural resources fire protection agency.³ Our current program direction is to take suppression actions that are both offensive and defensive on farm, range, forest, watershed, or other uncultivated lands in private and public ownership. DNRC accomplishes its mission of protecting these private and public lands through a combination of three primary methods. These methods are labeled as direct, contract, and state/county cooperative fire protection. These methods are described as follows.

1. **Direct Protection**--This type of protection is handled directly by DNRC. Prevention, pre-suppression and suppression work are all considered DNRC direct fire protection responsibility. DNRC hires personnel and purchases equipment necessary to fulfill wildland fire protection responsibilities for assigned lands. Landowners under direct protection are assessed a fee that funds a portion of the total cost of wildland fire protection. Assigned lands are within established wildland fire protection districts or units.

2. **Contract Protection**--This type of protection is provided to state and privately owned lands by a federal agency or tribal agency that has been recognized by the DNRC Director. Recognized federal fire protection agencies are required to provide protection at the same or higher level as they do on their own lands. Contracting is accomplished either by the offset method or by direct payment to the federal agency for their services. Currently contract fire protection exists with USDA, Forest Service, Department of Interior, Bureau of Land Management, Department of Interior, Fish Wildlife Service and Confederated Salish and Kootenai Tribes.

²**MCA 76-13-102. Definitions.** (14) "Wildland fire protection" means the work of prevention, detection, and suppression of wildland fires and includes training required to perform those functions.

Protection, in this case, includes prevention, detection, and suppression and are defined as follows:

1. Prevention--Activities directed at reducing the number of fires that start, including public education, law enforcement, and engineering methods to reduce fuel hazards.
2. Detection--The act or system of discovering and locating fires.
3. Suppression--All the work of extinguishing or confining a fire beginning with its discovery. Suppression action may take the form of either defensive or offensive.

³**MCA 76-13-136. Cooperative agreements with owners and lessees of land for fire protection and conservation.** (1) For the purpose of more adequately promoting and facilitating the cooperation, financial and otherwise, between the State and all of the public and private agencies or individuals therein, the department of Natural Resources and Conservation may cooperate with owners or lessees of farm, range, forest, watershed, or other uncultivated lands in private and public ownership for the protection from fire of the cultivated agricultural crops or natural resources existing or growing thereon and also in the conservation and perpetuation of such lands and resources, including the prevention of soil erosion and the regulation of stream flow.

3. **State/County Cooperative Protection**--The state and county cooperative fire program is lower intensity fire protection than that of direct or contract protection, but it fully meets the legal requirements for protecting natural resources. The county provides the basic level of fire protection through a system of volunteers, county personnel, rural fire districts, etc. The county may be supported by the State in matters of organization, planning, equipment, training, and fire suppression.

C. STRUCTURAL/IMPROVEMENTS FIRE SUPPRESSION

Montana law also states that DNRC **may** protect non-forest lands and **improvements** when requested by the landowner. DNRC has elected to provide protection to non-forest lands, when requested by the landowner, through the use of non-forest agreements. We have not elected to provide the same level of protection to improvements.

Suppression actions by DNRC on structures will be defensive in nature and thus be confined to the exterior of structures. DNRC wildland firefighters are **ABSOLUTELY PROHIBITED** from performing any interior firefighting activities on structures. Structural firefighting, both offensive and defensive, is the basic responsibility of local fire service agencies. It should be noted, though, that not all structures located within the state are covered by a local fire service. Many wildland areas within the Department's direct protection responsibility contain structures that are not covered by a structural fire service. On wildfires where structures may be threatened and there is no local structural fire service responsibility, DNRC may hire qualified structural firefighting services to provide protection for the duration of the wildfire threat. Until qualified structural services have arrived at the fire scene, DNRC personnel shall limit their actions on structural fires to:

1. **Activities Necessary For The Immediate Protection or Saving of HUMAN LIFE**--The protection of human life shall only be attempted by DNRC firefighters when such suppression activities will not jeopardize the lives of the firefighters. DNRC firefighters will **not** enter the interior of any burning structure and may only conduct defensive structural suppression actions.
2. **Defensive Suppression Actions Intended to Contain The Fire to the Structure Involved**--These actions are confined to the **exterior** of the structure only. **NO** offensive interior suppression actions will be undertaken by DNRC firefighters. The primary focus of DNRC firefighting forces shall be to prevent the fire from spreading to nearby wildlands by restricting or confining it to the structure. DNRC firefighters will conduct defensive suppression actions involving structures only to the extent they can be performed safely. Firefighters should be made aware that

structures may contain unseen highly hazardous materials that may explode violently or produce toxic fumes and/or smoke.

3. **Defense of The Structure Prior to Ignition From an Approaching Wildfire**--Defensive actions will be carried out safely and ensure that firefighters lives are not placed in danger to save a structure. DNRC firefighting personnel may attempt to defend a structure from destruction from the outside (exterior) utilizing various tactics. These tactics may include spraying water or foam on the structure, burning out from existing or established control lines, and clearing fuels/materials from around the structure to make a "defensible space" to protect the structure from an approaching wildfire. Tactics used will be within the capabilities of DNRC wildland firefighting personnel and equipment. Wildland incident commanders may sacrifice wildland acres in the defense of improvements, utilizing wildland suppression equipment, if they feel these actions will not jeopardize their overall wildland suppression strategy. Again, at **NO** time will DNRC firefighters put themselves in danger to defend a structure.

D. LINE OFFICER GUIDANCE TO INCIDENT COMMANDERS FOR DEFENSIBLE SPACE TREATMENTS ON PRIVATE LAND

1. Attempts should be made to get the landowner's (signed) approval for defensible space treatments prior to clearing vegetation. If time does not permit you to issue consent forms, but you get a verbal agreement, document the conversation.
2. Consent forms should be passed out along with evacuation notices to landowners. The landowner will sign the form and return them to the ICP. If you are unable to get a signed consent form, no defensible space treatment will be performed on the property unless not doing so compromises firefighter safety.

It is imperative to inform the landowner that we will be altering the vegetation on their property and it will not look the same when we are done.

E. NORTHERN ROCKIES COORDINATING GROUP DEFINITIONS AND STANDARDS

1. **Structure Protection**– Protecting the structure from the threat of damage from an advancing wildland fire normally does not include an attack of fire that is inside the structure. It involves the use of fire control lines (constructed or natural) and the extinguishing of spot fires near or on the structure. This protection can be provided by both the rural and/or local government fire department firefighters and the wildland fire protection firefighter. This does not include an interior attack of fire that is in the structure. It involves the use of standard wildland protection tactics, control methods, and equipment, including fire control lines and the extinguishing of spot fires near or on the structure.
2. **Wildland Fire Protection**–A service with the primary responsibility of protecting natural resources and watersheds from damage by wildfires. State and federal forestry or land management and some local government agencies normally provide wildland fire protection with specially trained and equipped personnel. **Structure Fire Suppression**–Defined as interior or exterior actions taken to suppress and extinguish a burning structure or improvement associated with standard structure fire protection, equipment and training. Refer to the Northern Rockies Coordinating Group Community and Structure Protection Guidelines.
3. Federal and state agencies with wildland fire protection authority and capability may provide **structure fire protection** on wildland fires both

on or off lands administered or protected through agreements by those agencies.

4. During an initial attack incidence, the agency with wildland fire protection responsibility should bear the costs of personnel and equipment utilized to suppress the wildland fire, which includes structure protection resources ordered by that agency. If a local government entity with structure fire jurisdiction and responsibility (in Montana, a rural fire district, a municipal fire department, or a fire service area) desires to increase the level of protection, a “you order, you pay” philosophy should prevail.
5. Implement a unified command under the incident command system (ICS) as soon as possible to assure onsite agreement as to what is ordered by whom and who pays. For mutual aid or a preplanned dispatch, the “who pays” should have been determined in advance and documented in the operating plan.
6. During an extended attack incident that involves structure protection issues and/or multiple jurisdictions/boundary fires, utilize agency representatives or a unified command structure to agree on site who orders what and who pays. Consider establishment of a single ordering point and develop a written cost share agreement to document these decisions.
7. On project size fires, include all structure protection issues and “how to handle” in the delegation of authority. Utilize unified command or fully qualified agency representatives to assure joint decision-making is integrated into incident control objectives, strategic and tactical implementation actions, and ordering processes. A written cost share agreement will be utilized to document apportionment decisions. Order technical specialists for assistance in developing agreements and utilize local fire officials in preparing and implementing structure protection plans.

F. NORTHERN ROCKIES COORDINATING GROUP GUIDELINES

1. Wildland fire agencies have primary responsibility for fire suppression within their protection area. Wildland fire agencies have a responsibility to prevent a wildfire from spreading into areas of structures and to assist the jurisdictional fire agencies in protecting structures from advancing wildfires.
2. Local government agencies (in Montana and North Dakota: rural fire districts, municipal fire departments and fire service areas; in Idaho: local fire organizations) have primary structure responsibility within their defined jurisdictional areas. Local agencies should not be reimbursed for performing their responsibilities within their jurisdiction.

3. Local agencies may be reimbursed by the wildland agencies when performing beyond their responsibilities (and within qualifications) or outside their jurisdiction, as determined by the incident commander/agency representative and guided by provisions of local operations plans.
4. Use existing agreements, operating plans and established ordering procedures to order structure protection resources.
5. Incident resources, whether reimbursed or at no cost, incur support costs (food, lodging, fuel, tools, etc.) that must be considered and documented in the development of any cost share agreement.
6. The management of any wildfire that burns or threatens the protection area of more than one fire agency (federal, state, or local, including fire protection districts) will include these other agencies in the incident management. This is accomplished through participation as a unified incident commander or as an agency representative or a coordinated delegation of authority between affected jurisdictions.
7. One agency cannot financially commit another agency (federal, state, county or district) without the knowledge and consent of the committed agency.
8. Agencies responding to requests for assistance need to know, at the time of dispatch, if the cost of their response will be reimbursable or free to the requesting agency. Incident commanders, as well as requesting and responding agencies (through dispatch centers) must communicate and document the basis for payment of resources requested for the incident.
9. Cost-share agreements should be used to document apportioned costs.

**NORTHERN ROCKIES COORDINATION GROUP
MULTI- AGENCY COORDINATION**

MONTANA STRUCTURE PROTECTION PROTOCOLS

Situation:

1. Wildland fire only.
 - a. Follow the Fire Management Plan.
2. Wildland fire with structures and no structural fire protection by a structural fire department.
 - a. Follow the Fire Management Plan.
 - b. Contact the County Commissioners.
 - c. Contact the County Disaster and Emergency Services office.
 - d. Refer to the Northern Rockies Coordinating Group letter; Community and Structure Fire Protection Guidelines for the Northern Rockies.
3. Wildland fire with structures that are protected by a structural fire department.
 - a. Follow the Fire Management Plan.
 - b. Establish a unified Command structure with the Fire Chief.
 - c. Follow all direction outlined in the Mobilization of Local Government Firefighting Resources guide (Umbrella Document), specifically (F) Guidelines for Hiring and Reimbursement of Local Government Forces Within Their Jurisdiction.
 - d. Order a DNRC Fire Advisor (Tech. Spec.).
 - e. Refer to the Northern Rockies Coordinating Group letter; Community and Structure Fire Protection Guidelines for the Northern Rockies.

937 RAILROAD FIRE SUPPRESSION

A. RAILROAD CAUSED FIRES

Administrative Rule 36.10.125 - As determined necessary by the DNRC, railroad companies in Montana must prepare and periodically update working agreements. These agreements must address: safety and fire response procedures; and identify, remove, prevent, modify, abate, or correct wildland fire hazards and risks associated with railroad company operations. Should the agreement with a rail company provide direction or procedures different from those that follow, the procedures outlined in the agreement will supersede the following procedure:

When there is no agreement with a railroad company, the following procedures will be followed when a fire occurs within the boundary of any railroad-owned right-of-way.

1. Report the fire to the "responsible railroad contact" (reference 951-H for railroad contact information). Each land office should make definite arrangements, prior to the fire season, for reporting fires.
2. Dispatch a DNRC initial attack squad to the fire, and determine if the fire is "dangerous and threatening." (A dangerous and threatening fire is one that the incident commander believes will spread beyond the confines of the owned right-of-way and/or become too large for the railroad crews to suppress.)
3. If the fire is confined within the owned right-of-way, and **not** considered by the incident commander to be a threat to spread beyond the limits of the owned right-of-way, the firefighters should attack the fire and continue containment actions until railroad crews arrive. When railroad crews arrive, the fire will be turned over to them, if they are capable of controlling the fire, for suppression and mop-up.

A fire incident report will be filled out listing the expenses involved in such a holding action.

4. If the fire constitutes a threat to land under our protection, and the incident commander believes that it will spread beyond the confines of the owned right-of-way or already has spread beyond the owned right-of-way, then the initial attack squad should take action to control and suppress the fire.

This type of fire would be turned over to railroad crews for continuing suppression action when the DNRC Incident Commander feels that railroad crews are capable of handling the

situation. Once again, a fire incident report would be prepared listing all the appropriate data and expenses incurred.

5. Once a fire has been turned over to railroad crews, periodic checks should be made to ensure proper and complete mop-up. If a fire is not mopped up properly, and railroad crews have left the fire, the railroad will be notified immediately to continue mop-up. The DNRC squad would remain on the fire until the railroad crew arrived back on the fire. The state expenses in this case would be added to the fire report. If the fire has been properly mopped up, or if railroad crews are still working on the fire and it is confined to the owned right-of-way, no charge will be made for the patrol time.
6. If a fire escapes from the railroad-owned right-of-way while their crews are on the fire, or if it escapes due to improper mop-up, DNRC squads will attack, control and mop-up the entire fire, including that portion within the owned right-of-way boundaries. A complete fire incident report should be filed listing the charges to be used in a billing action to the railroad.
7. Prompt suppression action should be taken to control **all** fires during periods of dangerous spread conditions. Local contact with the various railroads will provide the land office with the instruction necessary to decide whether local railroad forces are able to control any given fire situation. Those fire situations that the railroad is not able or willing to handle will be handled by the DNRC or other local agencies. **Note:** *Montana Rail Link (MRL) has requested that we notify them, within a few days, of any fires that we become involved with which have been started by their operations. They would like to know where the fire occurred (nearest mile post marker number is sufficient) and what kind of resources we used in the suppression effort. They would also like to know what are estimated billable costs to them are so that they may begin to earmark funds in anticipation of our bill.*

If you respond to a railroad fire that is billable to MRL, please contact the following in writing

Chief Engineer
Montana Rail Link Inc.
101 International Way
P.O. Box 16390
Missoula, MT 59808

or contact the "Roadmaster" with whom you normally deal with in matters pertaining to MRL.

Commented [BC1]: What or who is this?

Refer to DNRC Fire Administration (200) Manual for individual agreements with specific Railroad Companies (i.e., BNSF, MRL, etc).

938 QUALIFICATIONS STANDARDS DURING INITIAL ATTACK

There appear to be varying interpretations within the federal agencies regarding the application of 310-1 qualification/certification standards to local, non-federal resources, particularly during initial action. The following points summarize National Wildfire Coordinating Group (NWCG) policy.

- The 310-1 qualification/certification standards are mandatory only for national mobilization of wildland firefighting resources.
- During initial action, all agencies (federal, state, local and tribal) accept each other's standards. Once jurisdiction is clearly established, then the standards of the agency(s) with jurisdiction prevail.
- Prior to the fire season, federal agencies should meet with their state, local and tribal agency partners and jointly determine the qualification/certification standards that will apply to the use of local, non-federal firefighters during initial action on fires on lands under the jurisdiction of a federal agency.
- The Geographic Area Coordinating Group should determine the application of 310-1 qualification/certification standards for mobilization within the geographic area.
- On fire where a non-federal agency is also an agency with legal jurisdiction, the standards of that agency apply.

939 PAYMENT OF LOCAL GOVERNMENT RESOURCES: GUIDELINES FOR HIRING AND REIMBURSEMENT OF LOCAL GOVERNMENT FORCES WITHIN THEIR JURISDICTION

A. DIRECT PROTECTION

1. Suppression

Local Government Firefighting Forces (LGFF) working within their legal jurisdiction will not be reimbursed by recognized wildland fire protection agencies for duties mandated by statute, the organization's by-laws, resolution, standard operating procedures, etc., or services normally provided by the LGFF, unless there are exceptions specifically provided for in the local annual operating plan and/or mutual aid agreements. In areas of DNRC Direct Protection with overlapping jurisdiction, LGFF may

be reimbursed after the first twenty-four hours on an incident. Reimbursement within the first twenty-four hours must be specifically provided for in the Annual Operating Plan (AOP), Mutual Aid Agreement (MAA) and/or formal contract. Examples of items that could be addressed in the annual operating plan include initial attack agreements and/or contracts for the early and late fire season when DNRC staffing does not allow for an appropriate response, authorization to hire LGFF resources to remain on an incident after the LGFF standards have been met, agreement on roles and responsibilities for extended attack and project fires, mutual aid, and pre-suppression severity availability.

2. **Presuppression**

Presuppression severity availability may be approved when the planning level requires a measured increase of the available resources required to respond in a timely manner to avert loss to life and natural resources. LGFF may be provided presuppression severity reimbursement within their jurisdiction when the LGFF is clearly performing the DNRC's mission.

Examples:

Hiring the appropriate number LGFF **personnel** (EFFs) to staff a fire station to be prepared to respond to a wildland fire incident that is within DNRC's jurisdictional responsibility (PL 4 or 5). The LGFF personnel will be in pay status for the duration of the period they are performing DNRC-assigned duties. The LGFF will not be reimbursed for apparatus until it is dispatched to a wildland fire incident as per the suppression guidelines above. The apparatus must have a pre-existing IRA and will be reimbursed as per IIBMH. In this scenario, these individuals may be available to respond to incidents other than wildland fires that are within the LGFFs responsibility, providing that the LGFF and the DNRC have agreed on a plan that clearly outlines items such as notification, backfill, and ensures the individuals are removed from pay status for the duration of these types of incidents.

LGFF resources (personnel and apparatus) hired as per the Mobilization of Local Government Firefighting Resources guidelines to bolster DNRC capabilities when pre-suppression severity availability is approved (PL 4 or 5) will be reimbursed at the full rate if these resources are under the control of the DNRC and are performing the DNRC's mission. These resources may be released to respond to incidents that are the responsibility of the LGFF. The DNRC may backfill with other available resources and has no responsibility to rehire the LGFF.

3. DNRC is not authorized to make payments directly to local Fire Service Organizations. Per Montana Code Annotated (MCA 17-8-311), "All payments made by a state agency to any city, town, county, or local government entity must be payable to the finance officer of the appropriate city, town, or county."

B. COUNTY CO-OP COST RECOVERY OPTIONS

1. **County may request fire suppression assistance under the terms of the State/County Coop Fire Agreement.**

- a. County resources must be fully committed within their jurisdiction and retain command or enter unified command (the county should provide a line officer or line officer representative).
- b. County commissioners verbally contact local DNRC Land Office to request assistance under the agreement.
- c. County Commissioners submit a formal letter to State Forester requesting assistance and support within 48 hours following verbal request.
- d. County is responsible for their costs with in county.
- e. County is responsible for any costs accrued through Mutual Aid Agreements.
- f. DNRC will be responsible for eligible resources ordered outside of the county.
- g. DNRC will be responsible for eligible resources ordered within the county provided, that they are autonomous of the county government.

2. **County may request Governor's declaration for reimbursement of eligible county fire suppression costs.**

- a. County requested assistance through DNRC via State/Co Coop program, which established beginning of eligibility period.
- b. The county invokes the emergency 2-mill levy.
- c. County requests Governor's declaration for reimbursement of eligible county fire suppression costs through DES.
- d. DES administers oversight and distribution of state emergency funds to requesting county.

3. **County may request FEMA fire management assistance grant through the State.**
 - a. State must meet threshold costs.
 - b. DNRC, on behalf of county, submits fire management assistance application to FEMA.
 - c. County submits subgrantee application (FEMA Form 90-133, Nov 02) to State within 30 days of closure of incident period.
 - d. If DNRC grant were to be approved, the county as subgrantee would be eligible for reimbursement of 75% of eligible costs.

Reimbursement of Local Government Forces within their Jurisdiction applies only to Wildland Fires in Areas within DNRC Direct Protection and only when it is identified in the Annual Operating Plan or other agreements identified above, or it exceeds the 24-hour commitment.

Guidelines for Hiring and Reimbursement of Local Government Forces within their Jurisdiction

