

On March 29, 2011, FA IM-2011-021 was issued to provide updated policy and guidance on use of the Wildland Fire Decision Support System (WFDSS) and Fire Cost Certification. However, recent wildfires in Arizona, Alaska, and Colorado have brought to light the complexities of multi-jurisdictional incidents. The requirements and documentation for cost awareness varies among federal agencies. This may result in a lack of oversight for costs expended, or in duplicative efforts to certify costs. Multi-jurisdictional incidents are complicated by the involvement of numerous cooperators, agencies, and WFDSS approvers.

The BLM and National Park Service have distinct cost certification processes. In contrast, the US Forest Service, Bureau of Indian Affairs, and US Fish and Wildlife Service do not conduct cost certification, but establish awareness of expended funds based upon estimated costs in the WFDSS Course Of Action and approval requirements (*Interagency Standards for Fire and Fire Aviation Operations*, [Redbook] Ch. 11). These differences add to the confusion of how agencies verify cost awareness. We plan to bring this issue before NWCG for some final resolution following the 2011 fire season.

Based upon this background, we want to provide some additional guidance to the states on cost certification through this white paper. Below we describe leadership intent related to cost awareness, provide sideboards for BLM cost certification, and explain documentation requirements using multi-jurisdictional fires from 2011 as examples.

#### BLM Fire Leadership Intent

- Cumulative, total fire cost serves as an integrated measure meaningful to congress and other oversight groups.
- As cost thresholds are met, WFDSS decisions will be approved by a local Agency Administrator, and costs will be certified by the State or Bureau Director.
- Total fire cost is the preferred metric for BLM cost certification when BLM is the lead agency, established by acres burned, resources involved, cost share agreement, or management participation. In these cases, certification will be completed as total fire cost thresholds are reached.
- BLM-specific cost is an acceptable metric for cost certification when BLM is a minor agency in the management of a fire, established by acres burned, resources involved, cost share agreement, or management participation. In these instances, WFDSS approval constitutes cost awareness by the Bureau of Indian Affairs, US Fish and Wildlife Services, and the US Forest Service. Consequently, there is no need for an additional certification by BLM.
- BLM States have the option of completing cost certification as thresholds are reached in any instance where they desire additional documentation of fire costs.

#### Intent of Cost Certification

- Cost certification is a process which allows a BLM Agency Administrator to acknowledge, at pre-identified cost thresholds, that the expenditure of funds on an incident is commensurate with considerations such as safety, fire complexity, and values at risk.
- The cost certification process is triggered when costs are anticipated to reach thresholds identified in Chapter 11 of the Redbook.
- The process is meant to illustrate the cumulative expenditures for an incident, rather than individual costs which are difficult to parse out in real time.
- Where possible, managers should focus on efficiencies related to interagency coordination and collaboration. Ideally, one agency per fire should verify cost awareness, through WFDSS approval or by separate cost certification (BLM, NPS)

#### Cost Interpretation - 2011 Incidents

**#1. Horseshoe 2 Fire, Arizona – 223,000 acres.** Burned off the Coronado NF on to BLM land (1000-2000 acre estimate on BLM lands). Current total fire cost is over \$40 million. Three Type I teams and one Type II team rotated out through the duration of the fire. In this situation, it's agreed by all partners

that the FS is the lead agency with majority justification, WFDSS, primary ownership, and is following WFDSS approval processes. BLM Agency Administrator is one of the WFDSS approvers, and has reviewed and concurred with the FS WFDSS documentation.

*In this example, the FS is verifying awareness of fire cost through their WFDSS Approval and is the lead agency. BLM-specific costs are well below the \$2M threshold. Based upon the lead agency and costs incurred, it is not necessary for the BLM to do additional cost certification, even though a BLM Agency Administrator is one approver of the WFDSS decision.*

**#2. 271 Hastings Fire, Alaska – 23,110 acres.** Has the potential to impact one Native allotment. The fire is within a State protection area, on State and private lands. The single WFDSS approver is a non-BLM Agency Administrator. The State is using the WFDSS to document their decision process and currently is estimating a final fire cost of \$20,000,000. Based upon a cost share agreement with the State, BLM is responsible only for costs proportional to the final acreage affected. In this instance, BLM lands will be well under one percent. BLM will be reimbursed for all costs expended per the cost share agreement.

*In this case, because BLM is only minimally involved in this fire based upon acreage involved and costs incurred, there is no need to complete cost certification through the State or BLM Director.*

**#3. Duckett Fire, Colorado - 4350 acres.** Based upon ownership and suppression oversight, the USFS is the lead agency on this fire, followed by State and private lands. Although this fire has the potential to burn for a long period of time, only 91 acres of BLM lands have burned. The local BLM Manager is one of three WFDSS approvers. On June 16, the BLM Colorado Acting State Director signed a certification for total estimated costs exceeding \$2,000,000 as per current BLM policy. Of the \$2,000,000, only approximately \$55,000 are BLM costs based on the soon-to-be signed cost share agreement. A WFDSS decision published on 6/23/11 projects total fire costs through late June reaching \$9,900,000. BLM proportional costs for this WFDSS decision will likely be less than 5% of this projection (approximately \$500,000).

*In the Duckett Fire, both BLM and USFS agency administrators have approved the WFDSS decision. Because BLM is only minimally involved in this fire, it is not necessary for the BLM to do additional cost certification documentation. However, State leadership completed a cost certification based upon total fire costs when the thresholds were reached. This is appropriate if additional documentation is desired by the State Director.*

**#4. 207 East Volkmer Fire, Alaska – 58,079 acres.** Fire located in State of Alaska protection area and is burning on State, private, Doyon Limited and Mendad Cha-ag Native Corporation lands. These Native Corporation lands were created under the Alaska Native Claims Settlement Act, which also stipulates that those lands will receive wildland fire protection services from the United States at no cost to the Corporation. The two WFDSS approvers are State and BLM Agency Administrators. BLM serves as the lead agency in this instance, being fiscally responsible for the percentage of final costs that equals the percentage of acres of Native corporation lands and allotments within the final perimeter. Of the total acreage, approximately 45% are Native corporation lands. Final anticipated costs are estimated to be \$8,000,000.

*In this example, a cost certification is necessary by the State Director. The cost share agreement stipulates that BLM is responsible for proportional costs for Native lands within the final perimeter. Specifically, BLM's costs are 45% of the \$8M total fire cost (\$3.6M).*