

2022 Wildfire Preparedness Plan

Prepared For:

Governor Jared Polis and Members of the Colorado General Assembly

April 2022



EXECUTIVE SUMMARY

2022 Wildfire Outlook Summary

Current long range forecasts indicate above average temperatures and below average precipitation from now into June. That will result in the persistence and expansion of drought conditions across the State, and the emergence of above average significant fire potential over the eastern portions of Colorado this spring. The long range warm and dry projections suggest an earlier than normal start to the core fire season during the second half of May across all of southern Colorado. Continuation of the warm and dry conditions is expected to result in drought intensification and earlier than average spring snowpack runoff, leading to above normal large fire potential expanding across southern Colorado in May, and throughout most of Colorado by June.

2022 Planning Summary

The 2022 Wildfire Preparedness Plan is part of a holistic, comprehensive approach to wildfire management that includes suppression and response, fuels and forest management, and mitigation activities of all types. The plan is based on lessons learned from previous years, and also implements new tools and capacities as a result of recommendations of the Colorado Fire Commission and support from the Governor's Office and the Colorado General Assembly.

DFPC will coordinate with local, State and Federal partners to leverage available resources to increase response capacity and effectiveness. This includes the continued use of extended extending contracts for existing DFPC aviation resources, continued utilization of resources and activities that were introduced in 2020 and 2021 (Firewatch detection program, a DFPC contracted Large Air Tanker, DFPC Modules, COVID-19 mitigation measures, and pre-positioning of ground-based resources), and the continued utilization addition of new resources added in 2021 (Type 1 helicopter contract and an Enhanced State Assistance program).



I. INTRODUCTION

The Division of Fire Prevention and Control is pleased to present the 2022 Wildfire Preparedness Plan to the Governor and the General Assembly. This Plan is adopted pursuant to CRS 24-33.5-1227 and includes information on the wildfire outlook and the State's plan for responding to wildfires in 2022.

Wildfire Preparedness Plan

Colorado law, specifically Section 24-33.5-1227(2)(a), C.R.S., requires the Director of the Division of Fire Prevention and Control to develop an annual Wildfire Preparedness Plan in collaboration with a representative of the County Sheriffs of Colorado, a representative of the Colorado State Fire Chiefs' Association, the Director of the Office of Emergency Management, and the Adjutant General.

The Wildfire Preparedness Plan shall be designed to address the following:

- 1) The amount of aerial firefighting resources necessary for the state of Colorado at times of high and low wildfire risk;
- 2) The availability of appropriate aerial firefighting equipment and personnel at times of high fire risk to respond to a wildfire;
- 3) The availability of state wildfire engines and staffing of the engines at different levels of wildfire risk;
- 4) The availability of wildfire hand crews, including state inmate wildfire hand crews, at different levels of wildfire risk; and
- 5) A process for ordering and dispatching aerial firefighting equipment and personnel that is consistent with, and supportive of, the statewide mobilization plan prepared pursuant to Section 24-33.5-705.4, C.R.S.

Colorado law, specifically Section 24-33.5-1226(2.5), C.R.S., also requires that the annual Wildfire Preparedness Plan include approved uses for money in the wildfire emergency preparedness fund to provide wildfire suppression assistance to county sheriffs, municipal fire departments, or fire protection districts throughout the state at no such cost to such entities beyond those specifically listed in statute.



II. HISTORY AND BACKGROUND

Increasing Wildfire Problem

Wildland fire has always been a part of Colorado's natural ecosystems, but drought conditions, warmer temperatures, an increasing number of homes in Wildland Urban Interface (WUI) areas, and declining forest health have elevated wildland fire from a manageable natural resource problem to a growing public safety concern that has caused catastrophic damage in the last two decades. In order to address the growing wildfire problem in Colorado, decision makers at federal, state, and local levels are taking a proactive approach and learning from the challenges faced by Colorado and other western states in recent years.

Colorado's Largest Recorded Wildfires			
Rank	Fire Name	Acres Burned	Year
1	Cameron Peak	208,913	2020
2	East Troublesome	193,812	2020
3	Pine Gulch	139,007	2020
4	Hayman	137,760	2002
5	Spring Creek	108,045	2018
6	High Park	87,284	2012
7	Missionary Ridge	70,485	2002
8	West Fork	58,570	2013
9	416 Fire	54,129	2018
10	Papoose	49,628	2013
11	Bridger	45,800	2008
12	Last Chance	45,000	2012
13	Bear Springs	44,662	2001
14	MM 117	42,795	2018
15	Beaver Creek	38,380	2016
16	Bull Draw	36,549	2018
17	Badger Hole*	33,421	2018
18	Grizzly Creek	32,431	2020
19	Logan	32,546	2017
20	Burn Canyon	31,300	2002

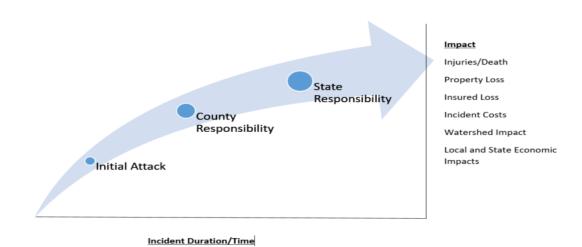


Historical data presents a clear picture of the increasing problem of large wildfires and climatologists predict that the problem is only going to get worse. Core fire seasons are now an average of 78 days longer than they were in the 1970s, and the United States burns twice as many acres as it did 40 years ago. Since the 1990s, the number, intensity, complexity, and impacts of wildfires in Colorado have been growing exponentially, and experts predict that it will continue to worsen. In the 1960s, the average annual number of wildfires in Colorado was 457. These fires burned an average of 8,170 acres annually. By the 1990s, the average number of fires and acres burned had more than doubled to about 1,300 fires with 22,000 acres. Between the 1990s and the 2000s, the average number of fires and acres burned more than doubled again. From 2012 through 2022, Colorado had an average of 5,507 fires and 221,661 acres burned per year on all ownerships. In 2021, there were a total of 6,679 fires reported on all lands that burned a total of 56,056 acres. While 2021 was more of an average year compared to fire activity and impacts in 2018 and 2020, the Marshall Fire served as an unfortunate reminder that wildfire is a year-round issue and that every Coloradoan and part of the State is at risk to its impact.

Looking at the historical data of the 20 largest wildfires in Colorado's history, nine of those (45%) have occurred since 2018, 15 of those (75%) have occurred since 2012, and all 20 (100%) have occurred since 2001. In addition, the three largest wildfires in Colorado's history all occurred in 2020, exceeding the Hayman fire that had held the top spot since 2002.

Although fire suppression costs are typically what is reported when a large fire occurs, these costs only make up a fraction of the total cost of wildland fire. Further compounding the problem, other secondary impacts from wildfires include flooding and damage to critical infrastructure like watersheds. Colorado experienced this first hand in 2021, with post-fire flooding from 2020 wildfires in the Glenwood and Poudre Canyons resulting in the loss of 4 civilian lives, and continued highway closures that disrupted transportation and commerce throughout the summer. Flooding and debris flow events are expected to occur in these areas for multiple years. Secondary impacts can extend beyond the State's borders, with the Colorado River alone providing water for drinking, agriculture, and hydroelectric power for over 40 million Americans, including the cities of Las Vegas, Los Angeles, Phoenix, Tucson, and San Diego.





As the frequency, size, and duration of wildfires has increased, the negative impacts to lives, property, and economies has correspondingly increased. These trends are expected to continue, and the wildfire issue is expected to continue to grow more complex based on:

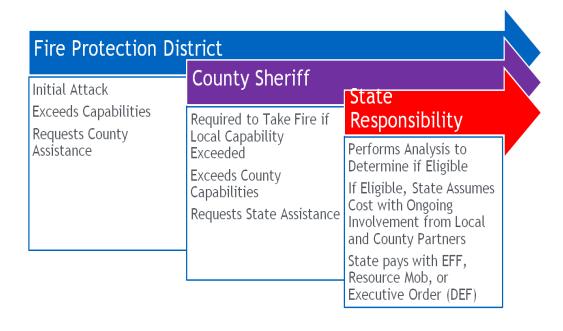
- By 2050 the area burned nationwide is expected to double to around 20 million acres per year
- Colorado is expected to experience up to a 5 fold increase in acres burned by 2050
- State Demographers expect Colorado's population to grow from 5.5 million people to 8.5 million people by 2050
- The number of homes in the Colorado Wildland Urban Interface (WUI) is projected to increase from 300,000 to 720,000 by 2030

While Colorado may experience times of low fire occurrence, the overall longterm outlooks and trends require robust preparedness planning, and we must continue to evaluate ways to improve our preparedness, response capacity, coordination, and collaboration.



How Fire Works in Colorado

Wildfire protection responsibilities on non-federal lands in Colorado follow a hierarchy of local jurisdiction, to the County Sheriff, and finally to the State of Colorado. The Chief of a Fire Protection District is responsible for fires that occur within the boundaries of their district, and that are within their capability to manage (C.R.S. 29-22.5-103(1)(a)). It is the duty of the County Sheriff to assume the responsibility for coordinating fire suppression efforts for: fires that occur in the unincorporated area of the county; or for fires that exceed the capabilities of a fire protection district (C.R.S. 30-10-513(1)(a)). When a wildfire exceeds the capability of the county to control or extinguish, the Sheriff shall request assistance from DFPC (see C.R.S. 30-10-513(1)(d)). The Director of DFPC may assume any duty or responsibility given to the Sheriff, with concurrence of the Sheriff (C.R.S. 30-10-513(2))





III. STATE SUPPORT TO LOCAL JURISDICTIONS

Before a fire exceeds a local jurisdiction's capability, the State offers resources to help keep fires small. These assistance can come in the form of ground resources, aviation resources, and technical assistance. After a fire exceeds a local jurisdiction's capability and a fire becomes State Responsibility, the State will continue to provide resources and will also take financial responsibility for fire suppression and other associated costs.

State Assistance Fires

The DFPC State Assistance program is intended to encourage rapid initial attack actions where fire is unwanted, to reduce the size, duration, costs, and impacts of wildfires. Key elements of the State Assistance program include:

- Funding and resources for local and County responsibility fires. The fire does not have to exceed the capacity of a Fire Department or the County to receive State Assistance.
- Enables local agencies to respond to their next incident, and volunteer firefighters to return to their regular jobs.
- Funding and reimbursement for aviation, handcrew, and other resources during the initial attack phase of fires on non-federal lands. Ordered resources are based on the Closest Forces concept to reduce response times, whether they are State or Federal agency managed resources.
- Funding support for pre-positioning of resources during periods of elevated fire potential and activity.
- DFPC Engine, Module, and Overhead resources, as well as technical assistance from DFPC fire management staff.
- The number of fires receiving aviation and handcrew funding and resources for the last 4 years is: 2021 (31 fires), 2020 (52 fires), 2019 (32 fires), and 2018 (75 fires)

In 2021, the Colorado General Assembly provided \$1,800,000 in dedicated, ongoing funds to cover the cost of providing these critical Enhanced State Assistance resources to local jurisdictions to help limit the duration and impact of wildland fires.

While 2018 and 2020 were record setting years for wildland fires, it is important to note that there are numerous examples of successful initial attack actions every year. The majority of these incidents never become State Responsibility incidents, and on those that do, incident size, duration, impacts, and costs are significantly reduced. In 2021 there were 25 agencies in 21 different Counties that requested state assistance for aviation and handcrew resources on 31 incidents. Notable examples of State



Assistance fires that occurred during elevated fire potential in the fall and winter of 2021 include: the Birdseye Fire (El Paso County near the US Air Force Academy), the Kruger Mountain Fire (Larimer County near Estes Park), the Miners Candle Fire (Clear Creek County near Georgetown), and the Oak Fire (Jefferson County near Ken Caryl) that started just 3 days prior to the Marshall Fire. With additional support from DFPC, these fires never grew to State Responsibility fires.

State Responsibility Fires

If the Sheriff believes a County Responsibility fire has exceeded their capacity to manage, they notify DFPC. DFPC field staff and the Sheriff conduct an assessment to evaluate if County capacity to manage the current and projected incident complexity has been exceeded. The DFPC Director approves the incident for State Responsibility based on assessment of the County's capacity and the availability of State funds. If the incident is approved for State Responsibility, DFPC assumes cost and management responsibility, along with ongoing involvement from local and County partners.

Funding for State Responsibility fires comes from two sources: the Emergency Fire Fund (EFF) or Governor's Executive Order (EO) utilizing Disaster Emergency Fund (DEF) or other State Funds. Key elements of the EFF program include:

- Created in 1967, with no significant updates other than slight increases in funding levels
- Counties participate on a voluntary basis, and not all Counties are part of the program
- Participating Counties contribute an annual amount based on assessed valuation and forested acres. The current formula does not support inclusion of eastern plains Counties.
- DFPC is the steward of the EFF funds, which are utilized for fires in contributing Counties that qualify for State Responsibility.
- Annual assessments currently equal \$1
 million per year, which is typically
 depleted within a few days of a large fire.
 This often occurs by late spring or early
 summer, requiring EO requests and
 approvals for every individual State
 Responsibility fire that occurs for the
 remainder of the calendar year.



Firefighters on the Marshall Fire, Colorado's most destructive wildfire in history, which started on December 30, 2021.



The number of State Responsibility fires has continually increased since the creation of the Emergency Fire Fund (EFF) in 1967. Between 1967 and 1979 there was a total of 1 fire that became a State Responsibility Fire, from 1980 to 1989 there were 8, from 1990 to 1999 there were 15, and from 2001 to 2009 that number exploded to 65 qualifying events. During the period from 2010 through 2019, even with the single qualifying fire in 2014 and no qualifying fires in 2015 or 2019, there were 74 state responsibility fires with an estimated \$168,000,000 in EFF and State suppression costs alone. It is estimated that \$95,000,000 of these State costs are eligible for reimbursements through FEMA Fire Management Assistance Grants (FMAG).

In 2021, there were 3 state responsibility fires with estimated suppression expenses of approximately \$2,700,000 in State funds and another \$14,400,000 in Federal funds. These numbers do not include local agency suppression costs, property losses, insured losses, recovery costs, secondary impact (flooding, re-seeding), watershed impacts, water system infrastructure costs, or economic losses that resulted from those fires. These numbers also do not include local, County, State, and Federal expenses on the other 6,000 plus wildfires in Colorado that were not State Responsibility incidents.

Years	# of State Responsibility Fires (SRF)
1967 to 1969	0
1970 to 1979	1
1980 to 1989	8
1990 to 1999	15
2000 to 2009	65
2010 to 2019	74
2020 to 2021	19
Total	182

Year	Number of State Responsibility Fires (SRF)	Estimated State Suppression Costs (EFF and EO)
2010	3	\$11,150,000
2011	11	\$11,281,000
2012	16	\$47,537,000
2013	9	\$36,891,000
2014	1	\$244,000
2015	0	\$0
2016	6	\$15,025,000
2017	10	\$6,453,000
2018	18	\$40,079,000
2019	0	\$0
2020	16	\$38,179,000
2021	3	\$2,704,000
Total	93	\$209,543,000



IV. 2022 WILDFIRE OUTLOOK

Each spring season, fire scientists and land managers produce coordinated outlooks to assess wildland fire potential and activity to plan and prioritize resources more efficiently for the upcoming peak. While it is too early to forecast with accuracy what the 2022 core fire season will bring for certain, significant wildland fire potential is expected to remain above normal in many areas of Colorado during the late spring and into summer. This outlook is heavily weighted upon persistent conditions and growing confidence in a warmer and drier than normal spring and early summer.

Current Conditions

Drought conditions continued to develop across Colorado beginning last July and have intensified and expanded in coverage through the spring of 2022. Currently, the state is in moderate drought, with severe to extreme drought in the eastern and southern part of Colorado respectively, according to the US Drought Monitor. These forecasted conditions are anticipated to persist, allowing fuels to remain receptive, especially during episodes of warm, dry, downslope wind events along the northern front range during the months this spring when above normal fire potential will persist. Elsewhere in Colorado, the potential is expected to be normal on the western slope through late spring due to frequent and timely snow events that have allowed adequate snowpack and snow water equivalent, though there was a lull in March when it was warmer and drier. The expectation is that the snow runoff will occur slightly earlier than normal due to the anticipated warm spring.

Snowpack levels across the Colorado mountains increased in January and February following a weak start in late fall and early winter. Warm temperatures in March allowed some of the snowpack to diminish, but overall snowpack and the snow water equivalent (SWE) as of April 1st are near average overall in the high country. Northwest and southeast Colorado are running near 88 percent of average, which is less than at this time last year.

Forecast Conditions

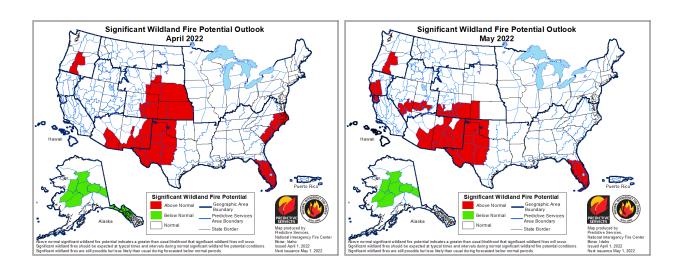
Persistence and intensification of above normal temperatures and below normal precipitation are anticipated during the outlook period from April through July. Although there is still considerable uncertainty, a robust Southwest Monsoon may develop in July as La Niña conditions weaken toward a neutral climate signal, allowing the western half of Colorado to potentially benefit from wetting rains and closer to normal wildland fire potential.

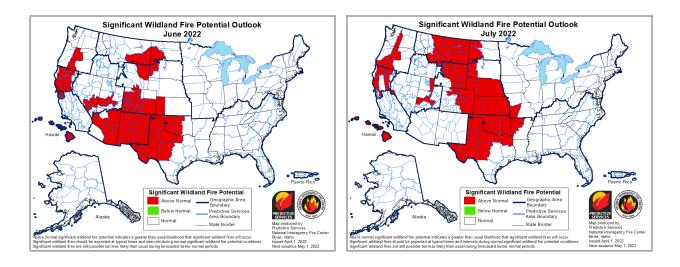
In addition to weather and other environmental factors, overall forest health and fuels conditions remain a concern for fire impacts and risk in the higher elevations of Colorado, especially where there has been substantial beetle kill in the lodgepole pine stands and where heavy dead and down timber remains.



It is important to note that even in an average fire season in Colorado, there will be approximately 5,507 fires burning an average of 221,661 total acres, with large State Responsibility Fires likely occurring. The 2016 and 2017 calendar years were both considered below average from a statistical standpoint, however there were a combined total of 16 State Responsibility Fires in those years, with a total cost of over \$21 million in State funds for suppression alone.

For the Full Seasonal Outlook briefing for the Rocky Mountain Area and recorded web briefing, please see the link on the Rocky Mountain Coordination Center website: https://gacc.nifc.gov/rmcc/predictive/outlook/rma seasonal briefing.mp4





30-120 Day National Outlooks for Significant Wildland Fire Potential



V. 2022 DFPC WILDFIRE RESPONSE STRATEGY AND RESOURCES

Overview of DFPC Strategy

Planning Assumptions

- Public and firefighter safety is the priority.
- Wildfires that exceed the capabilities of local and county resources will occur.
- Wildfires will threaten lives, property, and natural resources.
- Wildfires will threaten water supplies for Colorado residents and non-residents.
- Wildfires have significant potential to threaten local and State economies.
- No single entity or jurisdiction alone can manage every wildfire.
- Successful suppression and management of wildfires requires organized interagency cooperation at all levels of government.

Ensuring that state wildfire resources are identified, staffed, and positioned to respond will prevent some wildfires from becoming large catastrophic events, and will assist in the containment and suppression of those wildfires that do escape initial attack, thereby mitigating the far reaching impacts of these large incidents.

Leader's Intent on Incident Priorities

The following list, in order of numerical importance, shall be considered when developing incident strategies, tactics, and plan implementation:

- 1) Public and Firefighter Safety
- 2) Incident Stabilization
- 3) Property Conservation
- 4) Endangered Species, Environmental, and Economic Impacts
- 5) Resource Benefit



Early Detection

The early detection of new fires is a critical component of the DFPC wildfire management strategy. These efforts are focused on the identification of a fire and providing information to the jurisdictionally responsible agency on the fire's location, activity and behavior, potential, and proximity to values at risk. Notifying those agencies about new fires and providing associated information, allows them to take early action and make informed decisions. In areas where fire is unwanted and full suppression is the appropriate management response, early detection allows for initial attack actions while the fire is small, which increases the probability of success, reduces exposure to firefighters and the public, and minimizes fire size, duration, costs, and impacts.

The DFPC Multi-Mission Aircraft (MMA) utilize state-of-the-art infrared and color sensors operated by firefighters to find and locate fires. Maps, images, and other details about new fires are provided to fire managers, and can be provided to ground forces in a near real time manner. Local, County, and federal agencies can request a MMA to conduct detection missions over a specified area of concern, or to assist with fire and smoke reports that cannot be verified. DFPC will proactively conduct detection missions during times of elevated fire indices, high fire activity, or following periods of high lightning activity. Since the inception of the program in 2015, the MMAs have identified over 600 previously undetected fires. In calendar year 2021, the MMA program set new records for the number of new fires detected in 1 year (205 fires) and the number of new fires detected in 1 day (38 fires found on August 27, 2021).





The FireGuard program is a national capability to detect and monitor wildland fires and was first implemented in California in 2019. In 2020, Colorado became the second State to pilot this concept, through a joint partnership with the Department of Defense to provide real-time wildfire detection and monitoring support to the State and interagency partners. The program increases Colorado's overall detection and monitoring capacity to provide early clarity and continual updates for fires, especially at night, in remote areas, and when aircraft cannot fly. Intelligence products provide approximate acreage, location, and local weather for incidents, and are disseminated via several existing common operating picture applications for use at both tactical and strategic levels. For example, during Marshall Fire, FireGuard was the only tool available for monitoring fire location and spread when aircraft could not fly due to the high winds. The capability does not provide a detailed (1-meter) fire perimeter like the MMA or National Infrared Operations (NIROPS), but is accurate to within a few hundred meters. During the 5-month 2020 Colorado pilot program, 860 updates and reports were developed on 107 total fires. 527 updates and reports were issued in the less active 2021 Colorado fire year. Based on the success of the initial pilot efforts in both Colorado and California, the program was expanded in partnership with the US Forest Service to provide national level coverage. Currently, there are two FireGuard nodes providing coverage to the entire United States, with one in Colorado and one in California. Discussions are being held at the federal level to obtain permanent funding.

Aggressive Initial Attack and Enhanced State Assistance

Rapid, aggressive, initial attack on new fires (for fires where full suppression is the appropriate management response) can reduce the number of large fires that impact homes, communities, and infrastructure, and result in millions of dollars in suppression costs, recovery costs, and insured losses. Limiting the number, size, and duration of large wildfires will reduce exposure to and increase our ability to provide for the top wildfire management priority of the safety of firefighters and the public.

The concept of Enhanced State Assistance (ESA) was one of the initial recommendations of the Colorado Fire Commission, and the General Assembly funded (SB21-049) and authorized (SB21-113) this important concept in 2021. ESA expands on the historical State Assistance provided by DFPC and provides additional options, tools, and flexibility to increase the effectiveness of initial attack actions. Key resources and activities included under the new ESA include:

- Aviation resources utilized by local fire agencies and Counties during the initial attack and mutual aid phases of an incident. Aviation resources for additional operational periods can be approved by DFPC;
- Handcrew use by local fire agencies and Counties during the initial attack and mutual aid phases of an incident;



- DFPC Engine, Module, and Overhead resources utilized by local fire agencies and Counties during the initial attack and mutual aid phases of an incident.
 These resources can be utilized for additional operational periods as approved by DFPC; and
- Severity assignments and pre-positioning of ground, aviation, and overhead resources based on Preparedness Levels (see Attachment A for the 2022 Wildland Fire Resource Funding Guidelines for additional details).

Traditionally, aviation resources have not been included as part of interagency wildfire mutual aid in Colorado. Under the new Colorado Cooperative Wildland Fire Management and Stafford Act Response Agreement and the statewide Colorado Operating Plan between DFPC and the federal land management agencies, all resources including aviation, can be included under the new 24-hour mutual aid concept. This is a significant improvement for cooperative fire management in Colorado and will further encourage the use of appropriate resources during initial attack, reduce financial barriers to taking rapid actions, and reduce time and effort spent negotiating costs in the early phases of a fire. Mutual aid details and timeframes are identified in each individual County Operating Plan.

Preparedness Levels and Resource Availability

Wildland fire management is a collaborative, interagency effort in the western United States. No single State or agency is capable of responding to and managing all wildland fires on their own. Utilization of available resources from local, County, State and federal agencies is a necessity and standard practice on an annual basis.

Resources will be strategically located based on Rocky Mountain Area and Colorado preparedness levels, fire occurrence, weather, National Fire Danger Rating System indices, location of other resources, and other relevant factors. With the changes to WERF and the Enhanced State Assistance program, DFPC has increased ability to pre-position non-federal resources as needed within funding constraints. In an effort to leverage available resources and improve response efficiency, DFPC will coordinate with our federal partners to send the closest available resource to requests for aviation and other types of assistance.

State owned and managed aviation and other resources increases the overall capacity to respond to and manage wildfires within Colorado. They also provide a baseline level of resources under the operational control of DFPC, ensuring Colorado's needs are met regardless of movement of federal resources due to national priorities and fire needs in other States.



Dispatching and Mobilization of Resources

DFPC will also ensure the maintenance of the process for ordering and dispatching aviation, equipment, personnel, and other resources that is consistent with, and supportive of, the statewide mobilization plan prepared pursuant to Section 24-33.5-705.4, C.R.S. DFPC will: provide technical assistance and program management to identify local, county, and state resources; track and document their qualifications to national standards; and list those resources in the national mobilization system via the interagency zone dispatch centers, and in the Colorado Statewide Resource Mobilization System.

Colorado currently utilizes a "systems of systems" approach to mobilize firebased resources, using a combination of local, Public Service Answering Points, County, State, and Federal systems. This approach often results in confusion and frustration for local fire agencies, as well as inconsistencies and inefficiencies in processes and effectiveness. Collaborative efforts have been occurring to address these issues, as described below.

Over the last two years, the Colorado Surge program has been used during rapidly emerging incidents (e.g., Marshall Fire), as well as extended attack fires that experienced a dramatic escalation of fire behavior and impacts (e.g., Cameron Peak). In these situations, the fire behavior overwhelmed assigned resources and posted significant threats to a myriad of values at risk. Local mutual aid networks had been exhausted, and the State was requested to provide Surge resources. While ultimately successful, implementing the Surge program revealed a variety of inefficiencies that made execution cumbersome, labor-intensive, and dependent on one or two key individuals. The Colorado Coordinated Regional Mutual Aid System (CCRMAS) was recommended by the Colorado Fire Commission to establish an initial, baseline program, to coordinate and improve mutual aid response across the State for all firerelated incidents. That recommendation was approved by the Legislature, and development of the program is on-going. Short term actions for the program will include hiring of remaining staff, identifying and implementing short-term actions to streamline notifications and ordering processes, and development of formal rules for the program. Longer term solutions and processes will be assessed and implemented in conjunction with stakeholders from around the State. The overarching concept for the CCRMAS program is to provide one system and point of contact for local agencies when their capacity has been exceeded and they need fire resources from outside the local area.

The interagency wildfire dispatch system includes Fire Department, County, State, and Federal resources, and is utilized for wildfire incidents on all jurisdictions and ownerships. The system is successful in many areas and functions, but is based on an



outdated model of seasonal wildfire response. Identified challenges and issues include: recruitment, retention, and burnout of dispatchers; year-round fire activity and increases in the number of tactical resources with no corresponding increases in dispatch capacity; reliance on seasonal employees and out-of-state detailers with no local knowledge; and reduced staffing and a five day per week, standard business hours schedule from mid-fall to mid-spring, relying on answering services for after hours, weekend, and holiday wildfire support. The Bureau of Land Management (BLM), US Forest Service (USFS), and DFPC led a multi-year Rocky Mountain Area Dispatch Efficiency study to analyze and address those issues. Key focus areas of the study included: consolidation of interagency dispatch centers; improvement of dispatcher recruitment and retention; meeting current wildfire dispatching needs, including the current inability to dispatch aircraft on a year-round basis; limited levels of funding and support by non-federal entities; and increasing capacity to meet projected future increases in year-round fire activity and acres burned. Study recommendations have been approved, and will be implemented over the next 2 to 3 years as funding allows.

Training

Firefighters from local fire departments are the first line of response for wildfire incidents. Fire departments across the state provide mutual aid to neighboring departments at the beginning stages of a fire. Many of the smaller, volunteer fire departments do not have access to adequate wildland fire personal protective equipment or basic training on how to safely respond to wildland fire incidents due to lack of resources. DFPC offers training to fire departments across the state at no cost, but does not have enough dedicated training staff to ensure that all firefighters have access to the necessary training to keep them safe. The Colorado Fire Commission recommended increasing training staff and equipment at DFPC to better help meet the training needs of Colorado's fire service (See Recommendation 21-02 in 2021 Colorado Fire Commission Annual Report: Addendum at ColoradoFireCommission.com).







State Response Resources

DFPC Fire Management Staff

Based upon stakeholder driven strategic planning efforts, the DFPC changed its field structure in 2019 to better support local government needs. At the request of local governments, the Division reorganized from two Area Fire Management Officers (FMOs) and ten Regional Fire Management Officers, to four District Chief (DC) and 14 Battalion Chief (BC) positions strategically positioned throughout Colorado to provide an improved level of technical assistance and support to local jurisdictions. As a result of additional funding in 2021, DFPC was able to add four Deputy District Chief positions to further increase overall depth and capacity to support local fire agencies and Counties.

The BCs are the first point of contact for local jurisdictions when they need subject matter expertise in any component of wildland fire management including training and qualifications, grants, planning and preparedness, prescribed fire management, fire billing and reimbursement, etc. As requested, the BCs provide technical assistance to local agencies during wildfire incidents including: resource ordering, tactical support, incident management, funding, and serving in overhead positions on the fire as needed. The BCs and the County Sheriff jointly complete the assessment to determine if County capacity has been exceeded, and the BCs become Agency Administrators on State Responsibility Fires. BCs also direct local jurisdictions to contacts who can assist with needs provided by other DFPC Sections and programs.

Ground Resources

Ground based resources in Colorado consist of a combination of local fire agency, County, State, and federal agency resources. Local fire agencies provide the large majority of total firefighters and engines in Colorado, are typically the first resource to respond to most wildfire incidents, and are the key element to both successful mutual aid response and staffing of large, extended attack incidents.

The 2022 plan for ground based resources will be based on wildfire risk, occurrence, need, available funding, and may include a number of potential arrangements for strategic location of these resources.

Engines

The DFPC Engine Program provides assistance to local jurisdictions when local firefighting resources are overburdened due to number, complexity, or duration of fires. When areas of the state are under elevated fire conditions, DFPC engines may be prepositioned on severity assignments for the purpose of supplementing local resources for



rapid initial attack. Based on strategic planning efforts and feedback from local response agencies, it is a future goal that the state engines work with local partners to develop regional strike team / task force capabilities to enhance initial attack capacity. Staffed DFPC engines are located in Berthoud, Hudson, La Junta, Alamosa, and Montrose. These Type 3 and 4 engines consist of 4 DFPC personnel, and work with multiple local fire agencies to maximize response efficiency and availability, including co-location of DFPC and local fire agency resources. In addition to wildfires, the Engines augment local resources for non-wildfire and all-hazard incidents when needed.



In addition to State-staffed Engines, the CDPS Logistics Branch and DFPC assist rural fire agencies through the Federal Excess Personal Property (FEPP) program, by acquiring excess military equipment through the US Forest Service, retrofitting and fabricating those vehicles into fire engines, which are then loaned to those smaller fire departments. Currently there are 87 FEPP engines assigned to 74 local fire agencies, with four newly fabricated FEPP engines scheduled to replace older units by the end of 2022.

Modules

The 5 DFPC Modules are groups of 8 to 10 firefighters and are located in Windsor, Black Hawk, Colorado Springs, Dolores, and Steamboat Springs. The Modules can respond to wildfires as a single unit, or they can partner with local

government personnel when available or other DFPC Modules to form 20 person handcrews. When not involved in wildfire response, the Modules are actively involved in providing training to local agencies, planning and implementing prescribed fire projects, and implementing fuels management projects. The Modules will also be trained and equipped in the near future to assist with non-fire incidents, such as search and rescue, when needed.





State Wildland Inmate Fire Team (SWIFT) Crews

DFPC will continue to support these handcrews operated by the Colorado Department of Corrections (DOC) to provide training, logistical and/or overhead support that may be needed to ensure operational readiness and hazardous fuel reduction projects, as available. SWIFT crews are located in Buena Vista, Canon City, and Rifle.

Heavy Equipment Program

DFPC will continue to partner with the Colorado Department of Transportation (CDOT) on the availability of bulldozers, road graders, and other heavy equipment for wildfire suppression. CDOT provides the operators, heavy equipment and transports, while DFPC provides training, overhead for fireline supervision, and coordinates mobilization of resources. To date, 75 CDOT equipment operators have received basic training. These resources were utilized on several fires in 2018, including the Spring, Chateau, Lake Christine, and Weston Pass fires, and again in 2020 on the Pine Gulch and Grizzly Creek fires.

Aviation Resources

The 2022 plan for DFPC aerial firefighting resources will be based on wildfire risk, occurrence, need, and available funding, and may include any number of potential arrangements. Additional funding for aviation contracts was authorized by the General Assembly in 2021, allowing DFPC to contract for additional aviation resources, for longer duration periods, and to stagger resources to increase availability during the fall and spring. To the degree practicable and possible, the minimum deployment of DFPC aerial firefighting resources will be:

Rotor-Wing Aircraft

DFPC will operate two (2) Type 2 helicopters with DFPC helitack crews on Exclusive Use (EU) contracts of up to 230 days for each aircraft. The Montrose Helicopter was brought on contract on March 1, 2022 and the Canon City Helicopter was brought on contract on April, 4, 2022. The aircraft and crews perform a variety of tasks including recon, transport of personnel and supplies, water delivery, and non-fire missions when needed and appropriate. Both Helicopters will be equipped with a hoist starting in 2022, and Helitack crews will undergo training this spring and summer, which increases capacity for DFPC to support local agencies in search and rescue operations or for medical extractions on wildfire events. One helicopter is equipped with night operations capabilities making Colorado the only State fire agency in the nation providing night operations capabilities. Night operations of helicopters adds a level of risk and complexity, and therefore will only be utilized when values at risk warrant the



additional risk, and when the pilot has already flown the incident during the day and is familiar with the associated hazards in the area.

DFPC also plans to have an EU contract for one (1) Type 1 Helicopter again in 2022, while the Firehawk helicopter is being built. The aircraft is a restricted category aircraft (will only transport suppressants and not personnel). Based on conditions and fire potential, DFPC is planning to bring the aircraft on May 1, 2022, four weeks earlier than originally scheduled.



Colorado Army National Guard (CONG) helicopter resources can be available for wildfire response and support. Typically, the National Guard has Blackhawk and Chinook helicopters and pilots that are trained, approved, and available for interagency wildfire response. Activation of these resources requires approval of the Governor. The CONG and DFPC partner each year to provide classroom and field training to CONG personnel and pilots to increase their familiarity with interagency wildfire operations, increase proficiency and effectiveness, and to receive approval from the US Forest Service to fly on interagency wildland fires.

Fixed-Wing Aircraft

Multi-Mission Fixed-Wing Aircraft: DFPC will operate two (2) State-owned, fixed-wing Multi-Mission Aircraft (MMA). The MMA are operated by contracted pilots and mechanics, and staffed by DFCP mission sensor operators. The home base for the MMA is in Centennial, but they can be pre-positioned in other locations as needed. These resources perform fire detection, extended attack surveillance and support, and other non-fire mission support when needed and appropriate.

Single Engine Air Tankers: DFPC will operate a minimum of two Single Engine Air Tankers (SEATs) through an EU contract of up to 240 days for each aircraft. The first EU SEAT was brought on contract on February 1, 2022 and the second EU SEAT



started on April 4, 2022. DFPC will also administer a Call-When-Needed (CWN) program that makes additional SEATs and Scooper aircraft available if the wildfire situation dictates the need for additional resources.

Large Air Tankers and Very Large Air Tankers: DFPC plans to operate one Large Air Tanker (LAT) through an Exclusive Use contract of approximately 120 days. Based on conditions and fire potential, DFPC is planning to bring the aircraft on May 1, 2022, three weeks earlier than originally scheduled.



DFPC will continue to evaluate and pursue other opportunities for CWN resources to enhance firefighting capabilities. DFPC is currently pursuing CWN contracts for an Air Attack platform and for a long-duration, high altitude Unmanned Aerial System (UAS).





Other DFPC Support

Fire Investigations

Fire origin and cause investigation responsibilities were transferred to DFPC from the Colorado Bureau of Investigation in 2018. When requested by a local jurisdiction, DFPC provides support to local jurisdictions with cause and origin investigations for wildland fires, structure fires, and vehicle fires. DFPC has one dedicated fire investigator and one accelerant detection K-9 to respond to these requests and additional qualified personnel who can support investigations when not performing their regular duties. In 2021, DFPC provided support for 50 fire investigations, eight of which were wildland fire investigations.

	Type and Number of Fire Investigations Completed by DFPC since 2018					2018
Year	Type of Investigation		-			
	<u>Structure</u>	<u>Vehicle</u>	<u>Wildland</u>	<u>Other</u>	ADC Requested?	<u>Total for Year</u>
2018	59	14	6	4		83
2019	41	9	4	0		54
2020	31	0	4	3		38
2021	36	3	8	3	15*	50

^{*} Accelerant Detection Canine (ADC) came online 5/1/21. Of the 15 requests, 8 have come since 11/1/21.

When the state is asked to be involved in wildland fire investigations, we have proven success (e.g. - The state took lead on the Lake Christine Fire in Eagle County, the Chateau Fire in Teller County, and the Spring Creek Fire in Costilla County and law enforcement agencies were able to make arrests in all three cases based on the fire investigations conducted by the state.)



Facilitated Learning Analysis and After Action Reviews

DFPC is partnering with local fire agencies, Boulder County, and federal agencies to conduct a Facilitated Learning Analysis (FLA) of the Marshall Fire. The primary purpose of an FLA is to help those directly involved in an incident to learn and understand what happened, and then share that information with others. Given the unique nature of an urban conflagration event in Colorado and initial estimates that the Marshall Fire may be one of the 10 costliest fires in U.S. history, the agencies agreed that an FLA should be conducted to learn what we can from this event in order to better prepare for the future. The initial FLA effort will focus on:

- Scientific understanding of the weather and atmospheric conditions that contributed to the incident;
- Detailed analysis for fire behavior that led to the conflagration fire event;
- Coordinate and participate as appropriate with other entities such as USFA, ICC, NFFF, NFSA, UL, and NIST to identity additional lessons to be learned;
- Communication and interoperability among responding resources;
- Mobilization and mutual aid of resource; and
- General lessons learned.

The FLA report will be available later in 2022 on the Lessons Learned website at https://www.WildfireLessons.net/home under the Incident Review Database tab. Based on initial FLA findings, additional research and assessments may be conducted with the other entities listed above.





VI. ADDITIONAL NEEDS AND CONSIDERATIONS

Colorado Fire Commission Recommendations

In 2019, the first ever Colorado Fire Commission (CFC) was established by Senate Bill 19-040. The CFC is stakeholder-driven and is charged with evaluating firerelated issues across the State and developing meaningful recommendations for those issues, , including wildfire and the Wildland Urban Interface. CFC membership consists of 24 voting members and 8 Ex-Officio members, representing numerous disciplines and diverse geographic areas of the State. The CFC addressed three priority topics in its first year: wildfire funding, enhanced regional mutual aid, and fire data. The first CFC annual report to the Legislature and the Governor's Office was released in August of 2020, and contained 5 recommendations. Four of the five recommendations were addressed during the 2021 Legislative session in one form or another. The 2021 CFC report noted that the above issues are all interrelated in the overall goal of addressing fire in Colorado and its consequences. As a result, overlaps exist between the recommendations. Mutual aid is critical during initial attack when state assistance is utilized, so Recommendations 20-01 and 20-04 complement each other. Recommendations 20-03 and 20-04 look at the two sides of a wildfire incident, the initial attack phase when the fire is small and the State Responsibility phase when a large fire has exceeded local capabilities.

In year two, the CFC developed four recommendations that work together to further strengthen the Colorado Fire Service and its ability to respond to the everchanging fire landscape in Colorado. The focus was on improving the coordination of fire-based resources, ensuring Colorado's firefighters have access to adequate training, developing a system to allow for data-driven decision making, and assisting local communities with risk reduction. Those recommendations are:

- Recommendation 21-01: Implement the Colorado State Fire Coordination Center
 to integrate 24/7 capability for dispatching Colorado's fire based resources. This
 recommendation addresses coordinating fire-based resources across Colorado
 through the development of a State Fire Coordination Center. The Center will aid
 in the movement of fire-based resources during large events, support the
 Colorado Coordinated Mutual Aid System by providing year-round coordination
 and dispatching services, more effectively dispatch and track all State fire
 resources, including year-round fire aviation resources like the Firehawk
 helicopter.
- Recommendation 20-02: Enhance firefighter readiness through expanded training and certification opportunities. This recommendation increases access to training and certification for firefighters across Colorado by increasing the



number of state training resources (trainers and mobile training props) and subsidizing the cost of firefighter certifications. Improving access to training and certification allows the members of Colorado Fire Service to increase proficiency in their day-to-day operations, which reduces the risks to both first responders and the communities they serve.

- Recommendation 21-03: Implement a Data Driven Program to Reduce Risk and Strengthen Colorado's Fire Service. This recommendation allows for integration of various data sources into a user-friendly platform to increase data-driven decision making around Colorado's fire issues. Providing better data management for the fire service in Colorado is key to understanding gaps in data collection, informing the public, and determining where the fire service is going in the future and how to get there.
- Recommendation 21-04: Support the Statewide Community Risk Reduction Initiative. This recommendation creates a designated Community Risk Reduction Unit within DFPC that assigns a Community Risk Reduction Specialist, equipped with an educational trailer, to each quadrant of the state. The purpose of locating these professionals in each quadrant of the state will be to aid local jurisdictions in the development, implementation, and ongoing assessment and improvement of a risk reduction program for their community

Although we anticipate that these recommendations will be evaluated individually, moving forward on the entire package of recommendations will have the greatest positive impact on Colorado. DFPC will continue proactive engagement with these stakeholders and partners at the community, local, state, and federal level in our continued efforts to proactively address the growing fire problem within Colorado. We are all confident that continual evaluation of capacity and resource availability to support initial attack from a local, regional, statewide, and national basis for rapidly growing fires threatening citizens, visitors, natural resources, and economies, through on-going post-incident analysis and collaborative strategic planning efforts and activities will reduce our overall risk profiles. The Division will continue to remain focused on the diverse needs of all areas of the state as it relates to coordination and response to fire incidents and reduction of the likelihood or severity of an event when it does occur.

OTHER NEEDS

Permanent Aviation Facilities

Colorado has made significant investments in aviation resources, increasing overall State response capacity. Additional planning and corresponding investments are needed in support facilities for all state fire resources, but particularly for aviation resources. Over the last 18 to 24 months, there has been tremendous increases in costs and decreases in availability of facilities at airports across the State. At the time



of this report, the status of short and long term facilities for the MMA program is uncertain, and an available hangar and facilities have not been located in the proposed area for the Firehawk. Having appropriate facilities is a key component of ensuring the preparedness and readiness of the State's fire management personnel and assets, as well as providing security and protection for high dollar aviation resources from damaging weather and other risks.

Fire Investigations

Currently, DFPC has only one dedicated fire investigator and one of only two accelerant detection canines in the state. In an average year, Colorado has over 5,500 wildland fires alone, and one fire investigator cannot meet the demand for investigations support. DFPC anticipates it would need at least seven additional fire investigators to provide the necessary support to local jurisdictions on fire origin and cause investigations. Senate Bill 22-080 proposes a \$3,000,000 annual appropriation to DFPC to increase fire investigations capability at the state level and to provide a mechanism for building regional fire investigations teams, utilizing and reimbursing qualified fire investigators from local jurisdictions to ensure all fires are being investigated. As of the writing of this plan, Senate Bill 22-080 is in the Senate Appropriations Committee. Colorado lags behind other western states in identifying the cause and origin of large, human-started wildfires, as was highlighted in a series of Colorado Public Radio reports in 2021 (See https://www.cpr.org/2021/11/11/colorados-biggest-wildfires-are-mostlyhuman-caused-and-unsolved/). Without a good understanding of what is causing Colorado's wildfires, it is challenging to develop good strategy and public awareness campaigns to prevent them in the future.





VII. CONCLUSION

Colorado should anticipate an active wildland fire season in 2022 based on current outlooks due to drought conditions, warmer and drier weather patterns, snowpack levels, and fuel loads. Even in an average fire season, Colorado typically reports over 5,500 wildland fires burning over 220,000 acres. As of the writing of this report, there have been multiple wildfires already in 2022, most notably the Marshall Fire, the NCAR Fire, and the Bent Fork and Las Animas Fires, all of which spread quickly due to wind and forced evacuations. It is likely that local, state, and federal response capacity will be stretched due to the duration, complexity, impacts, and overall values at risk within the wildland urban interface in Colorado.

The Division, along with its fire service partners and stakeholders, greatly appreciate the leadership from the Governor and the Legislature for their willingness to be proactive in the providing of additional suppression resources through the 2021 Wildfire Stimulus Package to continue our aggressive initial attack response model. This commitment will help in saving lives, property, and the overall impacts of wildfire in Colorado. We are also appreciative of the commitment to maintain a balanced approach in funding both mitigation and suppression programs as well as the commitment to a more holistic approach to the overall fire problem in Colorado. Policy makers will need to continue to lean forward to develop and implement solutions to better prepare for and respond to wildland fires with an awareness that these incidents will continue to occur in Colorado. The Division will continue to monitor fire activity, resource availability, drought conditions, and extended weather forecasts to inform the appropriate individuals of any additional necessary requests for wildland fire support.



CONCURRENCE

This 2022 Wildfire Preparedness Plan was prepared by DFPC Director Mike Morgan. The following organizations and individuals concur with the recommendations contained therein:

For the County Sheriffs of Colorado		
CSOC Printed Name	 CSOC Signature	
COCO I Timed Name	ooo olghatalo	
For the Colorado State Fire Chiefs		
CSFC Printed Name	CSFC Signature	
For the Director of the Office of Emer	gency Management	
OEM Printed Name	OEM Signature	
For the Adjutant General		
AG Printed Name	AG Signature	

Attachment A: Colorado Division of Fire Prevention and Control 2022 Wildland Fire Resource Funding Guidelines



Colorado State law requires the Division of Fire Prevention and Control to administer and manage programs to assist local jurisdictions with safe and effective wildland fire response. Wildland firefighting resources under these various programs are eligible for funding and reimbursement to any Colorado County Sheriff, fire protection district, or municipal fire department in accordance with the following guidelines. <u>Funding and reimbursement will occur to the extent that program funds are available</u>, and <u>that notification and request procedures are followed.</u>

Enhanced State Assistance - Summary of Eligible Resources		
Resource – 1	Mutual Aid Period $-$ 1	Beyond the Mutual Aid Period -1
Handcrew and Modules	Yes	Yes
DFPC Engines & Modules	Yes	Yes
DFPC Overhead	Yes	Yes
Type 1, 2, and 3 Helicopters	Yes	Yes
Single Engine Air Tanker	Yes	Yes
Large Air Tanker	Yes	Yes
Very Large Air Tanker - 2	Yes – ²	Yes – ²
Multi-Mission Aircraft	Yes	Yes
Aerial Supervision	Yes	Yes

Green = Resource eligible for funding and reimbursement to the extent program funds are available.

Yellow = Resource may be approved for funding and reimbursement on an incident by incident basis by a DFPC Deputy Section Chief (or designee)

Notes:

- 1 Funding and reimbursement is limited to non-mutual aid resources as identified in the County Operating Plan.
- 2 DFPC approval for usage of a VLAT must occur prior to ordering.

Notifications and Funding Requests

- If multiple air tanker drops and/or multiple hours of helicopter time occur on an incident, <u>notification must be</u> provided to DFPC (Battalion or District Chief) as soon as possible,
- Prior DFPC approval is required for funding and reimbursement of any resource use beyond the mutual aid period.
 Requesting agency and DFPC staff will discuss incident status, tactics, values at risk, etc. prior to DFPC decisions for these requests.
- If the requesting agency is expecting funding and reimbursement from the State of Colorado to pay for any amount of resource use, that agency must <u>formally notify DFPC and make that request</u> within 7 days of resource use. All formal funding and reimbursement requests should be made by using the online form that can be accessed at: https://goo.gl/forms/HWEYDjTXxE5iG4F33. The requester must be prepared to provide the following information: Who requested the resource (Sheriff, fire chief, etc.); Fire Name; Incident Number (whenever available); Mutual aid end date and time; Resource Name(s); Dates of Use; and copies of Resource Orders (whenever available).

Page 1 of 2 Version: 03/25/2022

	Enhanced State Assistance - Additional Details
Not Eligible for	Resources utilized within their jurisdiction or utilized in accordance with pre-established Mutual Aid plans and agreements are not eligible for funding and reimbursement.
Reimbursement	Costs for resources utilized outside of these guidelines will be charged to the requesting agency(ies). Actual costs will vary by resource utilized.
	Resource(s) utilized on state and private land fires, and for fires that occur within the federal mutual aid areas as defined in the County Operating Plan.
	Refer to County Operating Plan for Mutual Aid time periods and geographical boundaries.
	Resource funding and reimbursement beyond the mutual aid period may be approved by DFPC prior to use, based on factors such as fire potential, values at risk, defined mutual aid periods, boundary line fires, availability of funds, etc.
	Resources must be qualified in accordance with applicable NWCG standard(s).
	Logistical costs of lodging, camping, transportation/fuel and per diem.
	Aviation - Only OAS or USFS interagency FIRE carded pilots and aircraft, ordered through the procedures outlined in the County Operating Plan.
Eligible Resources and Expenses	Aviation - Helitack related items (additional government helicopter personnel, support equipment and apparatus), as outlined in the Standards for Interagency Incident Business Management and appropriate supplements.
	Aviation - Additional aircraft support positions (aircraft dispatcher, tanker base support, aircraft timekeeper, etc.).
	Aviation - Expenses to maintain aircraft availability including contracted vendor support, crew, relief crew, and fuel and support trucks assigned to aviation resources.
	Aviation - Daily Availability costs of aviation resources.
	Pre-position and Severity assignments for handcrews, modules, engines, overhead, and aviation resources. Approvals will be made prior to assignment, will be coordinated by DFPC District Chiefs, and will be based on DFPC Preparedness Levels, resource needs, and available funds.
	Extended Staffing costs for DFPC-managed resources. Approvals will be coordinated by DFPC District Chiefs, and will be based on DFPC Preparedness Levels, resource needs, and available funds.
	DPFC ground and aviation resources utilized for prescribed fire, Search and Rescue (SAR), and other all-hazard incidents in support of local governments.
	 Requesting agency orders the appropriate Kind and Type of resource(s). Consult the County OP for the local, state, and interagency dispatch procedures to order aviation resources.
Ordering	2. Dispatch centers will use the "Closest Forces" concept.
Process	 It is the requesting agency's responsibility to notify DFPC (District or Battalion Chief) when orders for multiple aviation resources occur as indicated on page 1 of these guidelines, or for resource use beyond the Mutual Aid period.
	Contact your DFPC Battalion Chief for additional clarification on these guidelines.