

## BF Committee

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**From:** Jolyn G. Prieto <jolyn@hawaii firefighters.org>  
**Sent:** Friday, April 13, 2018 3:37 PM  
**To:** BF Committee  
**Subject:** EMAILING: BF-136\_HI Fire Fighters Association, Local 1463\_Comments  
**Attachments:** 2018-0413\_BF-136\_HI Fire Fighters Assn\_Comments.pdf

Aloha Chair Hokama,

In alignment with the April 13, 2018 deadline in your April 2, 2018-dated correspondence for the Hawaii Fire Fighters Association (HFFA) to provide recommendations and comments on **BF-136** relating to the Performance Audit of the Department of Fire and Public Safety, please find attached a PDF-copy of our letter.

A hard copy has been mailed.

Mahalo for the opportunity to provide comments.

Please contact our office if you have any questions.

Sincerely,

**Jolyn Garidan Prieto**

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## HAWAII FIRE FIGHTERS ASSOCIATION

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April 13, 2018

Mr. Riki Hokama, Chair  
Budget and Finance Committee  
Maui County Council  
200 S. High Street  
Wailuku, Maui, HI 96793

Re: Performance Audit of the Department of Fire and Public Safety (BF-136)

Dear Chair Hokama,

The Hawaii Fire Fighters Association (HFFA), Local 1463, IAFF, AFL-CIO represents more than 1,900 professional active-duty firefighters, with (408) members in the County of Maui. We appreciate this opportunity to relay our recommendations and comments to the Budget and Finance Committee of the Maui County Council relating to the performance and fiscal audit of the Maui Department of Fire and Public Safety (MFD) as titled BF-136.

HFFA maintains one fundamental area of concern – to be able to not only provide safe and adequate fire and rescue services for Maui County communities but to also ensure that the safety and well-being of our Bargaining Unit 11 (BU-11) Maui members is not compromised while they provide these services. Such is clearly articulated in both the standards set nationally and by *Section 41. Company Staffing* in our BU-11 collective bargaining agreement (CBA).

The references in BF-136 on the National Fire Protection Association (NFPA) 1710 entitled, *Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Departments* (2016 Edition) is misused – The Auditor falsely states that “NFPA 1710 has always recommended the staffing of firefighting units to be at four (4) personnel per unit for safety and effectiveness reasons” (page 23). Instead, it would be correct to state that NFPA *specifies* that a four (4) personnel staffing is the minimum for a company to provide adequate services but may specify the need for increased staffing based on other factors assessed by their respective jurisdiction or jurisdictional area per the standard.

While the Occupational Safety and Health Administration (OSHA) requires that four (4) personnel staffing is the minimum number of fire fighters necessary to initiate operations to enter into an immediate danger to life and health atmosphere, the four (4) personnel is not necessarily sufficient to safely and effectively operate at residential; commercial; apartment; and high-rise fires for the first arriving unit-company (which will also include additional responding companies) for the initial full alarm assignment and greater alarm assignments.

The Auditor explains the geographical restrictions and accompanying increased response times to assemble safe and adequate fire fighting forces. What the Auditor mistakenly omitted was that it was based upon the scientific NFPA 1710 assessment of Maui County’s existing geographical restrictions;



lengthier average response-times; and current occupancy risks for all districts. The specified minimum unit-company staffing is five (5) personnel minimum per engine and ladder truck companies and six (6) personnel minimum per special operations company, e.g., Search-and-Rescue (SAR) and Hazardous Material (HAZMAT).

The previous staffing numbers are based upon NFPA 1710 and National Institute of Standards and Technology (NIST) studies that have already scientifically proven the specified number of fire fighters needed to extinguish each type of fire and conduct rescue operations when necessary. For example:

- During a low-hazard single-family house fire, fifteen (15) fire fighters will be deployed for the initial call/first alarm whereas during an open air commercial strip shopping center or garden apartment fire, twenty-eight (28) fire fighters will, instead, be deployed for the initial call/first alarm; and
- During a high-rise building fire that is at minimum seven (7) stories tall, more than forty-three (43) fire fighters will be deployed for the initial call/first alarm.

All of the above-mentioned scenarios do not include and/or take into consideration the additional resources – i.e, fire fighters and apparatuses – that will be deployed by the fire department should the situation require more.

MFD currently staffs all but one unit-company with five (5) assigned fire fighters and for operational and safety reasons, does not operate below a minimum staffing of four (4) fire fighters per unit-company. Section 41 of the current BU-11 CBA states,

*“The Employer shall endeavor to maintain its fire service staffing in accordance with nationally recognized standards... Employers who determine the need for an Employer company staffing policy for fifty-six (56) hour Employees shall develop staffing procedures in consultation with the Union.”*

This section of our BU-11 CBA sets its foundation based on the NFPA 1710 standards for company staffing and requires each jurisdiction to be annually informed via a formal report as to how the fire department is/is not meeting such standards. MFD’s Standard of Cover (SOC) document is inconsistent with both NFPA 1710 and the BU-11 CBA relating to nationally recognized standards on safe and adequate company staffing.

There are specified reasons both for the number of fire fighters assigned to each unit-company and the number of fire fighters required to dispatch for the initial call/first alarm and sequential greater alarm assignments (dependent on the type of building and occupancy) and the assigned number(s) is/are necessary to safely and adequately protect the public and fire fighters. When this is not correctly communicated or being achieved as identified in BF-136, the HFFA is concerned and should be consulted with on the specification of needed staffing levels and the development of Employer staffing procedures.

On a separate component of BF-136, the HFFA appreciated the Auditor’s effort to identify opportunities to improve fiscal efficiency while maintaining operational effectiveness. HFFA looks forward to the outcomes of improved fiscal tracking by MFD’s overall premium pay budget that would show a more accurate picture of the triggers for the various types of over-time pay. As the Auditor also

concluded in BF-136, these outcomes may demonstrate how programs, such as rank-for-rank recall, is not solely responsible for MFD's total premium pay requirements.

HFFA maintains that in addition to the safety and morale justifications for the rank-for-rank program in general, rank-for-rank recall is an important and very cost effective staffing tool for MFD to "voluntarily" comply to both the NFPA 1710 specified unit-company optimum staffing levels as well as the OSHA minimum staffing levels with "qualified" personnel using the current "overstaff" model presented in BF-136. While BF-136 contains some information that will essentially improve the effectiveness of MFD, it also has inaccurate information relating to staffing needs. HFFA retains its position that these inaccuracies could have easily been clarified had the Auditor held consultation meeting(s) with HFFA.

In brief, HFFA wants to relay and convey the national and CBA standard behind safe and adequate fire fighter staffing specified to protect the communities of Maui County as well as provide for the safety of our fire fighter members.

Thank you for the opportunity to provide comments on BF-136.

Respectfully,

A handwritten signature in blue ink, appearing to read "R. Lee", followed by a long horizontal flourish.

Robert H. Lee  
President

Cc: Mr. Bradford Ventura, Chairman – HFFA Executive Board, Maui Division  
Mr. Gregory Jenkins, Recorder – HFFA Executive Board, Maui Division  
Mr. Jeffrey Kihune, Board Member – HFFA Executive Board, Maui Division