

**GUAM FIRE DEPARTMENT
PROPOSED FIRE PREVENTION & EMS FEE
SCHEDULE INCREASE
ADMINISTRATIVE RULEMAKING PACKET**



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EXECUTIVE SUMMARY

The Guam Fire Department (“GFD”) is proposing updates to its existing fee schedule for selected fire prevention, inspection, permitting, and emergency medical-related services. The proposed adjustments are intended to modernize fees that have remained substantially unchanged despite significant increases in operational costs, inflationary pressures, emergency response demands, and regulatory compliance requirements.

The proposed fee schedule update is administrative and operational in nature and is not intended to create new penalties, expand enforcement authority, or increase fines associated with Fire Code violations. Existing fines and penalties established by law and administrative rule remain unchanged under this proposal.

The modernization of fees is necessary to ensure that the Guam Fire Department can continue providing essential fire suppression, prevention, rescue, emergency medical, and life safety services to the residents and visitors of Guam. Over time, the cost of emergency response operations, specialized equipment, firefighter and emergency medical training, fuel, maintenance, communications systems, inspection services, and emergency medical supplies has increased substantially while many departmental fees have remained outdated.

Pursuant to 10 GCA Chapter 72, the Guam Fire Department is statutorily authorized to establish and collect fees associated with certain fire prevention and emergency medical services, with revenues deposited into the Fire, Life, and Medical Emergency Fund (“FLAME Fund”).

The proposed fee adjustments are intended to:

- Improve cost recovery for specialized services;
- Support ongoing fire prevention and inspection operations;
- Sustain emergency medical response capabilities;
- Offset increased operational and equipment costs;
- Enhance public safety readiness and service delivery;
- Maintain compliance with applicable fire and life safety standards.

The proposal does not seek to generate excessive revenue beyond operational necessity. Rather, it is designed to ensure that fees more accurately reflect the actual cost of providing services that require personnel time, technical expertise, equipment deployment, inspections, administrative review, and emergency readiness.

Recent operational conditions further demonstrate the importance of maintaining a properly funded and operationally ready fire service agency. Guam continues to experience increased emergency preparedness demands related to typhoon response, hazardous conditions, emergency medical transport needs, fire prevention enforcement, and community resilience efforts.

The Guam Fire Department continues to provide island-wide emergency services including:

- Fire suppression;
- Rescue operations;
- Emergency medical response;
- Fire prevention inspections;
- Permit review and issuance;
- Hazard mitigation;
- Public safety education;
- Disaster and typhoon response operations.

The proposed adjustments are expected to improve fiscal sustainability within authorized statutory limits while reducing the long-term burden on General Fund appropriations for specialized service activities. Revenues generated through authorized fees are deposited into the FLAME Fund and utilized for emergency vehicles, rescue equipment, medical equipment, firefighter and paramedic training, and other statutorily authorized public safety expenditures.

The Guam Fire Department remains committed to transparency and public participation throughout the rulemaking and review process. Public informational town halls and public comment opportunities are being conducted in accordance with applicable Guam laws and administrative procedures to ensure meaningful community engagement prior to implementation.

LEGAL AUTHORITY

Statutory Authority of the Guam Fire Department

The Guam Fire Department derives its authority from Title 10 of the Guam Code Annotated, Division 3, Chapter 72.

Pursuant to **10 GCA § 72101**, the Guam Fire Department is authorized and required to:

“control and extinguish injurious or dangerous fires and to remove that which is liable to cause such fires, and to enforce all laws relating to the preventing or spreading of fires and all laws pertaining to fire control and fire hazards within the Territory.”

This statutory mandate establishes the Department's authority to conduct fire prevention activities, inspections, enforcement actions, and related public safety operations necessary to protect life and property.

Emergency Medical Services Authority

Under **10 GCA § 72105** and related provisions, the Guam Fire Department is authorized to provide emergency medical services and maintain emergency medical response capabilities, including Advanced Life Support (ALS) programs and Emergency Medical Technician certification programs.

These statutory provisions authorize the Department to maintain emergency medical infrastructure, staffing, training, and operational readiness necessary for island-wide EMS response.

Fire, Life, and Medical Emergency Fund ("FLAME Fund")

The primary statutory authority for the establishment and collection of fees is contained in **10 GCA § 72106**.

Pursuant to **10 GCA § 72106(b)**:

"The Guam Fire Department shall establish, in accordance with the Administrative Adjudication Law... a schedule of fees..."

The statute specifically authorizes fees associated with:

- Non-emergency ambulance transportation;
- Building inspections;
- Burning permits; and
- Related fire prevention services.

The same statutory provision authorizes fines related to:

- Fire hazards;
- Permit violations;
- Hazardous conditions;
- Fire Code non-compliance.

Importantly, the current proposal concerns fee modernization only and does not propose amendments to existing fine schedules or statutory penalties.

Under 10 GCA § 72106(a), all fees and fines collected pursuant to the approved schedule are deposited into the Fire, Life, and Medical Emergency Fund (“FLAME Fund”).

The statute further directs that FLAME Fund revenues be utilized for:

- Emergency rescue and firefighting vehicles;
- Critical maintenance and repairs;
- Emergency life support equipment;
- Medical equipment;
- EMT and paramedic training;
- Authorized firefighter salary adjustments.

Administrative Rulemaking Authority

The proposed fee schedule adjustments are subject to Guam’s Administrative Adjudication Law and applicable rulemaking procedures.

The Administrative Adjudication Law generally requires:

- Public notice;
- Opportunity for public comment;
- Publication requirements;
- Review and adoption procedures for agency rules and fee schedules.

Accordingly, the Guam Fire Department is conducting public informational town halls and accepting oral and written testimony to ensure transparency and compliance with administrative rulemaking requirements.

Fire Prevention and Public Safety Enforcement Authority

Additional statutory authority supporting fire prevention operations includes the Department’s authority to:

- Conduct inspections;
- Enforce Fire Code requirements;
- Issue permits;
- Mitigate fire hazards;
- Protect life and property;
- Respond to hazardous conditions.

Recent public safety advisories issued by the Government of Guam further demonstrate the operational necessity of permit enforcement and fire prevention oversight during emergency conditions and post-typhoon recovery periods.

PURPOSE AND NEED ASSESSMENT

Overview

The Guam Fire Department's proposed fee schedule adjustments are necessary to ensure the continued delivery of effective fire protection, emergency medical response, fire prevention, and public safety services throughout Guam.

The Department operates within an environment of increasing operational demand, aging infrastructure, rising equipment costs, inflationary pressures, and expanding emergency medical responsibilities. Many existing fees no longer reflect the actual cost associated with providing specialized services requiring personnel deployment, inspections, technical review, administrative processing, emergency readiness, and equipment utilization.

The proposed fee adjustments are intended to improve cost recovery while maintaining the Department's operational readiness and public safety mission.

Operational Realities

The Guam Fire Department provides island-wide emergency services on a continuous 24-hour basis, including:

- Structural firefighting;
- Wildland fire response;
- Rescue operations;
- Emergency medical services;
- Hazardous materials response;
- Fire prevention inspections;
- Permit issuance and review;
- Disaster preparedness and typhoon response.

Operational demands have increased substantially due to:

- Population and commercial growth;
- Increased construction and development activity;
- Expanded EMS response obligations;
- Increased emergency preparedness requirements;
- More complex building systems and fire protection standards.

Inflationary and Fiscal Pressures

Like many public safety agencies nationwide, the Guam Fire Department continues to experience substantial increases in operational expenditures, including:

- Emergency vehicle acquisition and maintenance;
- Fuel and utility costs;

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- Medical equipment and supplies;
- Fire suppression equipment;
- Communications systems;
- Protective equipment;
- Training and certification expenses;
- Facility maintenance and repair costs.

Many current fees were established years ago and no longer reflect actual service delivery costs. In some cases, the administrative cost of processing inspections, permits, and specialized service requests substantially exceeds the fee currently charged.

Failure to modernize fee schedules may contribute to:

- Increased strain on General Fund appropriations;
- Deferred equipment replacement;
- Increased maintenance backlogs;
- Reduced operational flexibility;
- Greater long-term fiscal pressure on emergency response capabilities.

EMS Cost Increases

Emergency medical services continue to represent one of the Department's most resource-intensive operational responsibilities.

EMS-related operational costs include:

- Ambulance acquisition and maintenance;
- Advanced life support equipment;
- Medical consumables and pharmaceuticals;
- EMT and paramedic certification;
- Continuing medical education;
- Specialized training requirements;
- Regulatory compliance obligations.

Infrastructure and Equipment Considerations

The Department must maintain operational readiness across multiple fire stations, emergency apparatus, communications systems, and response units.

Critical operational needs include:

- Replacement of aging apparatus;
- Maintenance of emergency rescue vehicles;
- Fire station upkeep;
- Medical equipment replacement;
- Technology modernization;
- Emergency communications reliability;
- Typhoon and disaster readiness capability.

Under 10 GCA § 72106(a), the FLAME Fund specifically authorizes expenditures for essential emergency rescue and firefighting vehicles, critical maintenance and repair, life support equipment, and firefighter training.

Public Safety and Community Impact

The proposed fee schedule update supports continued investment in:

- Faster emergency response capability;
- Reliable fire prevention services;
- Public safety inspections;
- Emergency medical readiness;
- Disaster preparedness;
- Community risk reduction initiatives.

Conclusion

The proposed fee adjustments represent an operational modernization effort intended to improve fiscal sustainability, support emergency readiness, and maintain the Guam Fire Department's ability to provide critical public safety services to the people of Guam.

The proposal is:

- Operationally necessary;
- Statutorily authorized;
- Administratively reviewable through public process;
- Limited to fee modernization;
- Not a proposal to increase fines or penalties.



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GUAM FIRE DEPARTMENT **ECONOMIC IMPACT STATEMENT (EIS)** **Proposed Fee Schedule Increase for the Fire Prevention Bureau and Emergency Medical Services May 2026**

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Prepared By:

Guam Fire Department Personnel (*Prepared in good faith by staff without formal economic analysis experience*)



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1. Executive Summary

The Guam Fire Department (GFD) proposes revisions to the fee schedules for the Fire Prevention Bureau (FPB) and Emergency Medical Services (EMS). This Economic Impact Statement (EIS) evaluates the financial and operational impacts of the proposed changes. The study is prepared by GFD personnel **without formal training in economic impact analysis**, using the best available data and conducted in good faith.

The proposed fee adjustments are expected to improve cost recovery, enhance operational readiness, and reduce reliance on the General Fund, with minimal adverse impact on individuals and businesses.

2. Introduction

This EIS supports the proposed amendments to FPB and EMS fee schedules. The current fees no longer reflect the true cost of service delivery due to increased operational demands, rising equipment costs, and expanded regulatory responsibilities.

3. Legal Basis and Requirements

Under **5 GCA Chapter 9 (Administrative Adjudication Act)**, agencies proposing new or increased fees must provide an Economic Impact Statement that includes:

- Financial impact on individuals, businesses, and government
- Cost justification for the proposed fees
- Consideration of alternatives
- Public notice and comment
- Submission to the Office of the Attorney General and the Legislature

This EIS fulfills the preliminary statutory requirement.

4. Purpose of the Proposed Fee Adjustments

The proposed fee increases aim to:

- Align fees with actual service costs
- Support equipment replacement and maintenance
- Improve EMS readiness and response capability
- Enhance FPB inspection and plan review efficiency
- Reduce reliance on General Fund appropriations

5. Methodology and Limitations

Methodology

- Internal cost data (labor, supplies, equipment)
- Historical service demand
- Comparable fee schedules from U.S. jurisdictions
- Revenue projections based on current service volumes



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Limitations

- No formal economic modeling
- Limited cost-allocation data
- No external consultant support
- Projections based on reasonable assumptions

Despite these limitations, the analysis reflects a sincere effort to comply with Guam law.

6. Economic Impact Analysis

A. Individuals and Households

- Minimal impact on the general public
- EMS fee increases may affect uninsured patients, but indigent care policies remain

B. Businesses

- Modest increases in compliance costs for construction and commercial sectors
- No significant impact on business viability

C. Government Operations

- Increased revenue supports training, equipment, and compliance
- Reduces pressure on the General Fund

D. GFD Service Delivery

- Improved inspection turnaround
- Enhanced EMS equipment availability
- Better alignment between costs and revenue

7. Cost Basis for Proposed Fee Adjustments

The proposed increases reflect:

- Rising costs of medical supplies, fuel, and specialized equipment
- Increased inspection and EMS transport demand
- Personnel training and certification requirements
- Technology and reporting system upgrades

8. Alternatives Considered

- **Maintain current fees:** Not sustainable
- **Smaller incremental increases:** Delays cost recovery
- **Tiered or risk-based fees:** Requires additional study and data



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10. Recommendation for Follow-Up Comprehensive EIS

GFD recommends conducting a **full, professionally supported EIS after one year of:**

- Collecting detailed cost-allocation data
- Monitoring revenue under the new fee structure
- Evaluating stakeholder feedback

This will ensure long-term fee policy accuracy and compliance.

11. Conclusion

This EIS satisfies the preliminary requirements under Guam law. While prepared by personnel without formal economic analysis training, it represents a good-faith, data-driven effort to assess the impacts of the proposed fee adjustments.

The proposed fee schedule is expected to significantly improve cost recovery and operational sustainability with minimal adverse effects on the community.