

Phase III • Preliminary Alternatives and Performance Measures



Cohesive Wildland Fire Management Strategy
National Goals; Collective Solutions

Response to Wildfire
Fire Adapted Communities
Resilient Landscapes
Supported by Science

Content analysis of stakeholder comments

Western Region



Prepared by:

METI

...a Merging of Excellence

Management and Engineering Technologies International, Inc.
8600 Boeing Drive, El Paso, Texas 79925

Contract: AG-3187-C-09-0028
Order Number: AG-3187-D-11-0203

July 20, 2012

Table of Contents

1.0 INTRODUCTION	1
1.1 OUTREACH EFFORT	1
1.2 OUTREACH SUMMARY	2
1.3 DOCUMENT ORGANIZATION	3
2.0 CONTENT ANALYSIS	3
2.1 PRELIMINARY ALTERNATIVE RATING.....	4
2.2 COMMENTS ON THE RANGE OF PRELIMINARY ALTERNATIVES	4
2.3 AREAS OF EMPHASIS IN THE PRELIMINARY ALTERNATIVES RATING.....	10
2.4 COMMENTS ON OTHER AREAS OF EMPHASIS.....	10
2.5 PRELIMINARY PERFORMANCE MEASURES RATING	14
2.6 COMMENTS ON PERFORMANCE MEASURES	14
2.7 COMMENTS ON CRUCIAL CONSIDERATIONS.....	21
3.0 COMMENT EVALUATION.....	25
4.0 OBSERVATIONS	26
APPENDIX A - PRELIMINARY ALTERNATIVES AND PERFORMANCE MEASURES SUMMARY	28
APPENDIX B - DESIGN OF THE STAKEHOLDER COMMENT OPPORTUNITY	31
APPENDIX C - METI CONTENT ANALYSIS TEAM.....	33

1.0 Introduction

This report documents stakeholder evaluation of and comments on the preliminary alternatives and performance measures developed for implementing the Western Region Strategy and Assessment as part of Phase III of the Cohesive Strategy. **Phase III** involves creating a range of alternatives and performance measures that can be quantified using available science and information within each Region. This process is currently underway. Comparing alternatives using the best available science to evaluate the consequences for different alternatives will illustrate the relationships between goals, objectives and actions within each Region. This information will then be used to develop implementation plans that serve as the basis to align the actions of agencies, tribes, individuals, and groups working toward common goals and objectives of the Cohesive Strategy.

The Western Regional Strategy Committee (WRSC) and Working Group (WG) are comprised of representatives from federal, tribal, state and local governments and non-government organizations, and local natural resource and fire service agencies. Each member represents a wide range of communities of interest with extensive networks of practitioners and constituents. As chartered, the WRSC and WG members are charged with communicating the purposes of the Phase III effort as well as soliciting comments and suggestions regarding the Strategy and Assessment and its implementation. A list of the WRSC and WG members and their affiliations may be found at <http://sites.nemac.org/westcohesivefire/members/>

The WRSC employed the services of Management and Engineering Technologies International, Inc. (METI) to assist with evaluating comments and preparing this content analysis report.

1.1 Outreach Effort

The importance of bottom-up strategy development through stakeholder comments during Phase II and III was one of the topics that arose during the more than 25 Cohesive Strategy presentations held in the West for interested stakeholders between Feb 3 and June 21, 2012. Continuing the collaborative dialogue in developing the Cohesive Strategy, the WRSC solicited stakeholder comment on proposed actions and metrics – termed preliminary alternatives and performance measures – from the Western Regional Strategy and Assessment that would be analyzed during Phase III by the National Science and Analysis Team (NSAT).

This step in the process was designed to collect feedback from stakeholders to help:

- Shape the range of alternatives and emphasis areas within alternatives for implementation of the National Wildfire Cohesive Strategy in the Western Region. (Objectives and actions to be emphasized during the first five to ten years of implementation)
- Identify and refine prospective performance measures or metrics associated with implementation. (Define measurable components toward success)

This opportunity for comment reaffirmed the WRSC's desire to provide transparency and an opportunity to help shape the suite of potential solutions to best meet the West's needs.

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

Both the opening and extension of the comment periods were noted in the WRSC monthly updates for June and July respectively, and distributed to the WRSC stakeholder outreach mailing list. Individual WRSC members forwarded this invitation to their own networks as well. In addition, the Western Region’s homepage featured a link to the comment form.

On June 11th the WRSC opened a stakeholder comment period for reviewing the proposed preliminary alternatives and performance measures. Stakeholders were provided the **Preliminary Alternatives and Performance Measures Summary**, Appendix A, and a web-based **Stakeholder Comment Form**, Appendix B. The original comment period was planned for June 11th to June 29th. Due to the demands of fire season, the WRSC decided on June 28th to extend the comment period. Joe Freeland, Working Group lead, emailed the WRSC stakeholder mailing list the following message, notifying them that the comment period would continue until July 10th:

Good afternoon, due to increased fire activity and other priorities, we recognize that the comment period for the West’s preliminary Cohesive Strategy alternatives has been brief. In that light and to simplify the comment solicitation effort, we are attaching the preliminary alternatives to this email and the link to the questionnaire. In addition we are extending the comment period to 1700 MDT on July 10th. Please let me know if you have any questions. Thanks for your participation.

<http://cohesivefire.nemac.org/webform/western-comment-form>

1.2 Outreach Summary

The number of outreach participants and the perspective of their comments represent only those who elected to participate. The result of the outreach effort by number of participants and affiliation group is presented in Table 1-1.

Table 1-1: Number of Stakeholders Commenting By Affiliation Group

Affiliation	Total
Federal Government	11
Fire Department	2
Forest Industry	1
Homeowner/Landowner	2
Local Government	2
Non-Governmental Organization (NGO)	16
State Government	4
Tribal	2
Totals	40

Stakeholder affiliations used are consistent with those used in the Western Region Phase II Content Analyses.

1.3 Document Organization

This report documents comments received during the outreach effort including e-mails and web-based solicitation. The information in content analysis report will be considered by the WRSC, Working Group, and the NSAT during their deliberations and preparation for Phase III of the Western Strategy.

This document is organized into the following sections:

Section 1: Introduction describes the intent and process used to solicit feedback on this portion of Strategy development.

Section 2: Content Analysis describes the process used and provides an analysis of those comments received related to objectives, actions and policy questions.

Section 3: Comment Evaluation describes the affiliation of those who commented and compares this to the previous outreach results for Phase II effort and the nature of comments provided.

Section 4: Observations provides recommendations to the WRSC and WG regarding key ideas and feedback from stakeholders on the preliminary alternatives and performance measures.

Appendices A, B and C: Include the Preliminary Alternatives and Performance Measures Summary, the web-based Stakeholder Comment Form, and the METI content analysis team members.

Note to Reviewers

The information derived from the content analysis only represents a portrait of comments provided by those who elected to participate in the outreach effort. It is not a statistically valid sample of stakeholders affected by wildland fire issues in the West. However, it does provide information about the variety of perspectives and in some cases points of agreement on different issues.

Although every attempt was made to identify individual comments and categorize them correctly, error is inevitable and thus some mistakes in classification may have occurred despite quality control and reviews conducted during the analysis process.

2.0 Content Analysis

The response to the ratings related questions (questions 1, 3, and 5) are summarized in the tables below by total number of comments and by affiliation. Three comments arrived via email and not all web based stakeholders rated the questions, so the total number of stakeholders in the rating table is less than the 40 commenter total.

Written responses on questions 2, 4, 6 and 7 are summarized below. For each question, comments were categorized by major themes. Text in italics represent direct quotes from the stakeholders.

Table 2-1 displays the number of distinct comments for each question where a written response was requested. Performance measures generated the greatest number of comments.

Table 2-1 – Number of Comments for Questions with Written Responses

Question Topic	# of Comments
Range of Alternatives	35
Alternative Emphasis	27
Performance Measures	62
Crucial Considerations	36
Total	160

The compressed timeframe for compilation and analysis of comments resulted in less synthesis of comments compared to previous efforts and a greater use of actual quotes to illustrate key concepts and ideas.

2.1 Preliminary Alternative Rating

Stakeholders were asked the following question:

How satisfied are you with the range of preliminary alternatives?

Table 2-2 displays commenter’s satisfaction with the range of preliminary alternatives. Comments are fairly evenly divided though slightly more stakeholders were somewhat satisfied or satisfied with the range of alternatives than those somewhat dissatisfied or dissatisfied. Discernible trends across affiliation was not evident other than the 2 stakeholders from local governments were somewhat satisfied with the range of alternatives.

Table 2-2 - Range of Alternatives Stakeholder Ratings

Affiliation	Do not address	Slightly address	Neutral	Mostly address	Completely address
Federal Government	1	3		5	1
Fire Department		1	1		
Forest Industry			1		
Homeowner/Landowner	1			1	
Local Government				2	
NGO	1	5		4	3
State Government		2	1	1	
Tribal			1	1	
Totals	3	11	4	14	4

2.2 Comments on the Range of Preliminary Alternatives

Stakeholders were asked to comment on the following question:

If you are not satisfied with the range of the preliminary alternatives to be analyzed, how should the range be expanded?

22 of the 40 stakeholders provided written comments on the range of alternatives. Key ideas that surfaced from stakeholders included:

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- Combine Alternatives 2 and 3 as there is little discernible difference between them.
- Combine Alternative 1 and 3 or 1 and 2 with less focus on mechanical treatment and more focus on wildland fire.
- Identify a no action alternative that will serve as a baseline for evaluation of alternatives and effects.
- Support for a blended alternative that emphasizes a bridge between the three primary goals.
- The clarity of alternatives was questioned by some stakeholders.
- Support for including key concepts such as collaboration, “all hands/all lands”, and engaging private landowners into all alternatives.
- *“The alternatives differ based on the level of emphasis placed on each of the three Cohesive Strategy goals, but the discussions of what would be happening under each alternative focus almost entirely on the areas of emphasis, rather than explaining how a shift in emphasis might affect work on the other goals. For instance, when there is an emphasis on fire-adapted communities, the work on creating/maintaining landscape resiliency should not disappear. Where that work is done, how, by whom, at what cost, using what methods, at what scale, etc. might be affected by the emphasis on FACs, but it would still continue. Ditto for suppression. We’ve sort of stovepiped the alternatives in presenting them -- which was not the intent.*

A total of 35 stakeholder comments were received on this question and were grouped in to the categories shown in Table 2-3.

Table 2-3 - Number of Comments By Major Category

Category	# of Comments
2.2.1 Range of Alternatives - Comments on additional alternatives or reconfiguration of existing alternatives.	7
2.2.2 Blended Alternative - Comments recommending an alternative that melds together the three primary goals, or recommends additional actions common to all alternatives.	10
2.2.3 Alternative Emphasis - Comments that expand upon or recommend a different emphasis for the alternatives.	8
2.2.4 Clarity of Alternatives - Comments questioning the meaning or intent of the various alternatives.	3
2.2.5 Other - General comments not fitting into the categories above.	3
Total	35

2.2.1 Range of Alternatives

Stakeholders provided several suggestions on different configuration of alternatives, an additional alternative including a no action alternative..

- ✓ *There appears to be little difference between Alternatives 2 and 3 based on the performance measures emphasized. The comparison table shows they are virtually the same. What's really different?*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- ✓ *I don't think Areas 2 and 3 should be separate. Collaboration is a necessary part of FACs, whether or not hazardous fuels reduction is a major focus of on-the-ground activities.*
- ✓ *I don't see a "no action" alternative. Descriptions in the 4 page document are perhaps necessarily brief, but so vague that it is difficult to understand in real terms what they mean, and therefore evaluate the differences. For example, Alt. 1 reads a little like "no action"--the current situation, but so does Alt 4--it is not clear. Alt. 2 and Alt 3 read similar, but is the burden of doing the work shifted to the private and local government sectors in 3 and that's the difference?*
- ✓ *While I agree with the alternatives presented, I believe there should be additional alternatives targeting wildfire prevention as well as promoting local ordinances that would motivate (including fines for inaction) landowners to utilize firewise principles if they live in high hazard areas.*
- ✓ *Is Alt. 2 all that different from Alt. 1? It seems to me, different phrases are used but in the end, is either of them that much different - perhaps you could clearly explain how they actually differ by using a table of comparison and by keeping the descriptive terms all the same.*

2.2.2 Blended Alternative

Comments on blended alternatives fall into three subcategories including creating an alternative that merges the three primary goals, combining alternatives into an alternative that emphasizes 2 different goals, and applying key concepts from one alternative to all alternatives.

The following comments represent the view that alternatives should be melded together to build a bridge between the three primary goals:

- ✓ *I see a blending of all 4 alternatives into locally developed preferred alternatives that can capture the dynamics of individual considerations as being critical to success through implementation. An alternative 5 may be appropriate in consideration of bridging all three goals and modifying performance measures to be inclusive of identifying successes considering variable sub-geographical differences*
- ✓ *Alternative #5: Emphasizes a bridge between all 3 primary goals; builds diverse programmatic community capacities to plan, coordinate, implement, research, and monitor hazardous fuel and forest health treatments; enables collaborative capacities to serve integrated roles in management, decision making, training, and response; facilitates partnership participation in local type III Incident Command Teams; provides for scalable assignments utilizing the workforce in place to address changing incident needs, priorities, and management objectives; focuses on community priorities; considers ecological community interactions; balances human integration with ecological function and resilience; and responds to disturbance as it occurs.*
- ✓ *In my view, and the view of the group I work with (Idaho Forest Restoration Partnership), alternatives 1-3 are not separate potential paths. They are pieces of a truly "cohesive" strategy for managing wildfire in the west.*

The following comments suggest different combinations of the existing alternatives to provide for focus on landscapes and communities.

- ✓ *I expected to see a better cross fit between Landscape resiliency and Fire Adapted Communities. None of the alternatives went there. Alternative 2 tried, but fell short. Alternative 3 with*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

Alternative 1 mix would have been ideal, meeting the vision of what the Cohesive Strategy is about. There are so many areas in the West who do things "right" - would have been great to see this at a larger scale, focusing on the differences of expertise. Protection of communities cannot happen without continual work in our wildlands. Working only on our remote wildlands will not help expanding WUI.

- ✓ *We would like to see an alternative developed that includes creating fire adapted communities, focusing treatments in and around established communities and using fire, both planned and unplanned ignitions, to restore and create fire adapted landscapes and communities. Alternatives 1 and 3 incorporated concerns of resilience and fire adapted communities, but there is not an alternative that combines both areas of concern. We would like to see an alternative developed to address these concerns and how they can be used together to increase fire safety and resilience.*
- ✓ *We propose that Alternative #1 should be merged with #3. Any treatments will have a social impact, regardless of the location. Public support is more likely if improvement of conditions or reduction of risk in WUI are part of the solution. Implementation does not need to be either/or but should be flexible and responsive to local impacts of forest health, resiliency, as well as WUI issues where present. Local data sharing, planning and discussion across jurisdictional boundaries is essential for successful collaborative approach.*

The following comments recommend that certain concepts be emphasized in all alternatives, including collaboration, "all hands, all lands" concept, and engagement of private landowners.

- ✓ *Collaboration is included in only one of the alternatives. Collaboration is not a wildland fire management objective or action in itself, but rather is a means for designing actions that are both implementable and more likely to be effective. All alternatives that support active vegetation management, watershed restoration activities and include an objective to provide jobs in rural communities should include "collaboration" between stakeholders as a component. In my view this includes alternatives 1-3.*
- ✓ *Collaboration should have been mentioned in all 4 alternatives. Changes to NEPA to achieve #1 and #2 are necessary before they can happen. More emphasis on engaging the private landowner should have been included in all 4 alternatives. I come from checkerboard landscape land, so we're all in this together.*
- ✓ *I think the language included in alt #4, about all hands/all lands and using local capacity including private sector needs to be woven throughout alternatives for any of them to be successful.*
- ✓ *If the intent is to determine which of these 4 alternatives is the preferred alternative, then yes more alternatives or expansion/melding of the existing alternatives is needed. For example, can we just accept landscape resiliency as a priority without maximizing firefighter safety and fire response? Can we get any of it done without major collaboration? Some cherry picking may be needed to make palatable and realistic alternatives.*

2.2.3 Alternative Emphasis

The following comments provide suggestions on the emphasis of the preliminary alternatives. Ideas include a greater emphasis on forest health, the Endangered Species Act, CWPP boundaries, addressing policy barriers, and better explanation of how the emphasis varies between alternatives.

- ✓ *It's not a matter of the expansion of the range of alternatives. Rather, it's a problem in terms of the way they are structured and presented. The alternatives supposedly differ based on the level of emphasis placed on each of the three Cohesive Strategy goals, but the discussions of what would be happening under each alternative focus almost entirely on the areas of emphasis, rather than explaining how a shift in emphasis might affect work on the other goals. For instance, when there is an emphasis on fire-adapted communities, the work on creating/maintaining landscape resiliency should not disappear. Where that work is done, how, by whom, at what cost, using what methods, at what scale, etc. might be affected by the emphasis on FACs, but it would still continue. Ditto for suppression. We've sort of stovepiped the alternatives in presenting them -- which was not the intent.*
- ✓ *With the majority of federal lands outside of WUI, there will always be a balancing act between priority funding for WUI and non-WUI, however, we should at least acknowledge emphasis on protecting, maintaining, and improving resiliency of ESA habitat.*
- ✓ *Alternatives with hazardous fuels treatment should include a clearer forest health management component. Include priority treatments for areas suffering from vast infestations of insects and damaging diseases; include current and future/projected impacts so as to enable land managers to develop more aggressive actions to achieve a healthy managed and resilient forest.*
- ✓ *This Alternative (1) should include addressing the policy barriers to achieving larger-scale forest restoration and management so as to achieve a more managed forest including species type, age, etc...*
- ✓ *Also, your purpose for landscape resilience seems to be economic and job creation. Employment rates should increase with landscape resiliency? Was this written by the Timber Industry? Come on, how do you manage a National Park with feller buncher? And why do you prioritize the timber industry for job creation when there are all other sectors of the economy that could grow with resilient landscapes. I think this is a fatal flaw. Do not tie landscape resilience to forest resources job creation!*
- ✓ *Thinking about alternative's 2, 3, and 4, some varying scale from legal community boundaries, outward needs to be establish unless the intent of these alternatives to confine themselves to CWFPP boundaries specifically. For to both achieve fire resilient communities work inside CWFPP boundaries and outward are needed due to today's forest and rangeland conditions until to some reasonable point is achieved. This is especially important with today's flammable conditions within and outside communities. Is it 2-3 miles outside of middle foreground? We know how fast wildfire travels long distances from the interior forest to community edge in today's situation.*

2.2.4 Clarity of Alternatives

Several stakeholders expressed concerns about the clarity of the alternatives.

- ✓ *It is difficult to comment on the alternatives because it is difficult to know what they really are describing by the way they are presently worded. For example, Alt. 1 says "Wildland fire (all uses) will also be a major emphasis, mechanical fuels treatment will be used prior to wildland fire; aggressive wildland fire suppression is essential to protect values..." - how can you have wildland fire use and aggressive suppression at the same time? Wouldn't it make more sense to say, "Where values need to be protected, there will be aggressive fire suppression?" - but maybe that is not what the intent of the alternative is? In Alt.2, it says "...over time, significantly reduces/modifies wildland fire response." Isn't this really an outcome of the alternative rather than a description of what the alternative is and so maybe this should be a performance measure? In Alt. 3, it states "...additionally remove barriers to encourage and facilitate actions by private citizens and all stakeholders to increase collaboration efforts and results to protect values at risk; " I have no idea what that means? What are the barriers and how do you know you can even reduce them - and how can increasing collaboration efforts and results "protect values at risk"?? Alt. 4 apparently has no mechanical fuels treatments? It also eludes to wise use of funds and protection of property/resources being emphasized - does that mean in the other alternatives, funds won't be wisely used and structures won't be protected? If I understand this alternative, to me it ought to be basic to all alternatives?*
- ✓ *What do you mean by "identifying preliminary alternative emphasis patterns to be analyzed"? What are "alternative emphasis patterns"?*
- ✓ *Alternatives obtuse and poorly described. None are biologically-driven.*

2.2.5 Other

Other comments related to budget assumptions, less division of performance expectations, and broadening economic measures.

- ✓ *Obviously the many alternatives have been winnowed to 4 very distinct options based on priorities and focus of each contributor. They do not need to be expanded, yet might benefit from less division in performance expectations.*
- ✓ *Alternative #2, you seem to provide all the economic stimulation with fuel cutters and not carpenters. Why not retrofit homes with class A roofs and hardboard siding, etc.? Why not pay landscapers to create fire safe landscaping?*
- ✓ *BUDGET ASSUMPTIONS: In the stated objectives, you mention, assume all alternatives are budget neutral. We do not think that may be the case for several reasons, some tied to what happened to FLAME funds being recently transferred out of this account and used for federal deficit budget recession decision making underway. And importantly I've heard forecast, that at best federal agencies will be facing annual 5% or greater cuts in budgets for the foreseeable future across the board. Other factors are that the differing alternatives described will have differing total cost profiles and the fire/forestry/range management community is still struggling with estimating a complete set of multiple use values for natural resources, an essential parameter in any and all proposed management scenario's as we know from practical experience they are very important, estimate tradeoffs, impacts and foregone opportunities.*

2.3 Areas of Emphasis in the Preliminary Alternatives Rating

Stakeholders were asked the following:

How well do the areas of emphasis in the preliminary alternatives align with issues you care about?

Table 2-4 displays commenters’ satisfaction with areas of emphasis in the alternatives. Some 67% of the stakeholders were mostly aligned or completely aligned with the areas of emphasis in the preliminary alternatives. Federal government, forest industry, local government, state government and non-government organizations’ alignment with areas of emphasis was 75% or greater.

Table 2-4 - Alternative Emphasis Stakeholder Ratings

Affiliation	Not at all aligned	Slightly aligned	Neutral	Mostly aligned	Completely aligned
Federal Government	1		1	8	
Fire Department		1	1		
Forest Industry				1	
Homeowner/Landowner		1		1	
Local Government				2	
NGO	1	3		8	2
State Government		1		3	
Tribal		1	1		
Totals	2	7	3	23	2

2.4 Comments on Other Areas of Emphasis

Stakeholders were asked to comment on the following question:

Are there other areas of emphasis that you think should be included to address your issues and concerns? Please explain.

Key ideas identified by stakeholders include:

- Stakeholders continue to focus on the importance of watersheds, water quality and quantity and question whether their importance is adequately reflected in the alternatives.
- Concerns about whether alternatives focus enough on capacity, infrastructure, and rural economies.
- Concern about emphasis on mechanical treatments in Alternative 1 and where it would be applied. More specificity may be appropriate.
- Support for greater use of wildland fire.
- Reoccurring theme of comments is the importance of focusing on the three primary goals with the idea of “you can’t have one without the other.” Perhaps the structure of alternatives and emphasis is not clearly understood.

A total of 27 stakeholder comments were received on this question and were grouped in to the categories shown in Table 2-5.

Table 2-5 - Number of Comments By Major Category

Category	# of Comments
2.4.1 Resource Considerations - Comments on watersheds, greater use of wildland fire and Endangered Species Act.	8
2.4.2 Economics/Capacity - Comments related to jobs, infrastructure, timber supply, long term maintenance costs and local capacity.	7
2.4.3 Barriers - Comments on environmental laws, lawsuits, climate change and skills.	2
2.4.4 Planning - Comments on forest plan revision, federal role.	6
2.4.5 Other - Comments on fire management	4
Total	27

2.4.1 Resource Considerations

Resource related considerations focused on the importance of water/watershed, greater use of wildland fire, and the Endangered Species Act.

Watershed Related Comments

- ✓ *One of the areas that can be expected to vary is water yield as a result of resilient forests. Overstocking is increasing crown interception and transpiration by trees, reducing overall soil moisture and aquifer retention, base streamflows that will become increasingly important if climate changes produce less precipitation.*
- ✓ *Resources such as water supplies are essential to both landscape and WUI. Treatments may have a far reaching impact across the board and distanced from treatment unless taken into consideration. The problems we are facing are not just the trees, and treatments do have unintended consequences as we attempt to discover best practices to meet our objectives. As in the Hippocratic Oath - First, do no harm.*

Greater Use of Wildland Fire

- ✓ *Sierra Forest Legacy has been working very closely with federal partners and other NGO partners to increase understanding and acceptance of increased use of planned and unplanned ignitions in the Sierra Nevada. The preliminary alternatives do not have any language focusing on the need for more fire to increase resilience to forests as well as to communities.*
- ✓ *We need to restore natural processes on the landscape. Fire appears to be closing the "fire deficit" causes by decades of fire suppression. Ecosystems in the western U.S. are adapted to fire. They can self-organize to respond to both fire occurrence and fire exclusion.*
- ✓ *My only concern would be that the goal of restoring and maintaining fire resilient landscapes could be lost or minimized under Alternatives 2-4. This is due to the suppression and community/middle ground focus of these alternatives. While these alternatives would have an impact on resilient landscapes (depending upon the scale of "landscape" referenced in the national goals) it seems important that all of the alternatives clearly address or state why they don't address how they would help achieve all three of the national goals. .*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- ✓ *In addition, Alternative 1 is very LIMITING in mandating (by the words will) mechanical treatment first, as this is very important, it is not required for every treatment, nor is it appropriate in all locations. In addition, with the expansion of biofuels, there is a higher potential for various options and doesn't appear to be addressed in the options. I anticipate alternative 1 will not be promoted by groups that value areas of the west.*

Endangered Species Act

- ✓ *We need to emphasize ESA habitat as a priority area in all alternatives, otherwise how will BLM and Forest Service Districts with mostly NON-WUI lands compete for limited funds?*

2.4.2 Economics/Capacity

Comments focused on sharing costs, concern about long term maintenance costs, the importance of rebuilding infrastructure, expanding mechanical treatments, and increasing capacity for restoration efforts.

- ✓ *Well, cost has to be a consideration. In my mind, we have to engage communities and the private sector in sharing the risk and responsibility for creating resilient landscapes and firewise communities, and that has to be a conscious choice.*
- ✓ *None of the areas of emphasis really get into long-term maintenance of this issue. None are a one-shot deal. Even #3, self-sufficiency & collaboration, doesn't address the big picture enough.*

Infrastructure/Jobs

- ✓ *Much of the emphasis is on landscape restoration and working together. More emphasis will have to be included in rebuilding the infrastructure to be able to harvest natural resources. Due to past policy mills and a place to take biomass have been eliminated.*
- ✓ *I would like to see a higher level of commitment to economic concerns that the rural counties are facing on schools and roads. More emphasis on mechanical treatments that would provide products and jobs.*
- ✓ *Language is weak in addressing economic activity - in Alt 1 it states that we should "consider" opportunities to stimulate economic activity. We do not need to consider; we need to prioritize the development of appropriately scaled industries to sustain forest restoration treatments without breaking agency budgets. To do this, industry needs an assured supply of forest products over 10 - 20 years. Collaborative stakeholder planning processes and landscape scale NEPA planning need be promoted to increase planning efficiencies and decrease treatment roadblocks. All of these concepts are within the WR Assessment and Strategy Goals and Objectives, just do not seem to be emphasized in the alternatives.*

Capacity

- ✓ *The ability to build and maintain local capacity to manage landscapes and fire is important. We need to support durable, well trained local capacity and avoid reliance on inconsistent outside technical capacity.*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- ✓ *We have to collectively build capacity at the ground level to carry out all pieces of the strategy in a multi-sectoral collaborative fashion. I don't really see that recognized as a strategy.....one can suppose it is embedded in all the strategies, but if so, it is not visible.....*

2.4.3 Barriers

Barrier related comments focused on environmental laws, lawsuits, and lack of well-trained fire teams.

- ✓ *Its estimated that our forest annual growth rate on the Nat Forests is about 3 bbf, our cut is less than that, How do we get ahead? The only way is a robust and responsible Logging program, and helping our timber industry regain its strength. This won't happen until we deal with the ill thought out environmental laws and the rampant lawsuits that block production.*
- ✓ *The Strategy talks about use of fire on the landscape and effective Suppression when needed. You have not mentioned the issues of shifting climatic conditions that make use of unplanned ignitions cost prohibitive. And a bad choice due to the possible long term damage to the resource. Using fire presumes well trained fire teams and leaders. We do not have that .*

2.4.4 Planning

Comments referenced relationship of the Cohesive Strategy to development of Forest Plans, and more federal involvement with private citizens and CWPPs.

- ✓ *Another area of concern is the development of new Forest plans for the National Forest and the need for a foolproof crosswalk between the Cohesive Strategy and the plans. We don't see that being addressed.*
- ✓ *Bringing federal/state managers to the table with private citizens in a landscape planning setting - identifying areas where working together, more gets done. CWPP is part of the answer - what the federal agencies can do could make a significant impact for the landscapes.*

2.4.5 Other

Comments focused on the role of the fire community, fire prevention programs, and success stories.

- ✓ *Fire management is a sub-category of land management. The fire community doesn't get that. They think fire is the driver, but it is not. None of the engineering solutions offered will work because they fail to fall within any land management context. It is likely impossible for the national fire community to realize their role as servants to local land management. The entire CS process demonstrates that incapacity.*
- ✓ *Emphasis on respect for fire and that it comes with great responsibility. Aggressive fire prevention programs in concert with fuels treatment.*
- ✓
 - 1) Show evidence of learning from past actions.
 - 2) Sometimes words are used without defining specific meanings. Please do a better job identifying definitions.
 - 3) Give 'on the ground' examples of models of success and failure and why.

2.5 Preliminary Performance Measures Rating

Stakeholders were asked the following:

How well do the preliminary performance measures address topics and issues you are concerned with?

Table 2.6 displays commenter’s satisfaction with preliminary performance measures. Comments were fairly evenly divided with 45 % of stakeholders rating the performance measures as either mostly or completely addressing topics or issues of concern, while 35% believe the measures only slightly or do not address issues of concern. When you consider the 7 neutral stakeholders, over half or 57% of stakeholders do not believe the performance measures mostly or completely address the issues of concern. Comments were fairly evenly divided across affiliation groups with the exception of fire departments and local government.

Table 2-6 - Preliminary Performance Measure Stakeholder Ratings

Affiliation	Do not address	Slightly address	Neutral	Mostly address	Completely address
Federal Government	1	2	3	3	1
Fire Department		2			
Forest Industry				1	
Homeowner/Landowner		1		1	
Local Government				2	
NGO	2	2	3	7	
State Government		2		2	
Tribal		1	1		
Totals	3	10	7	16	1

2.6 Comments on Performance Measures

Stakeholders were asked to comment on the following question:

Are there additional performance measures you recommend that would better address your issues or concerns? If possible, identify methods or data sets that can be used to measure these.

27 of the 40 stakeholders provided written comments on performance measures. While many stakeholders shared ideas about additional performance measures, few identified methods or data sets that could be used to measure them. Several stakeholders proposed performance measures similar to those listed in the Preliminary Performance Measure Table; however they often add a degree of specificity. The amount of substantive comments and recommendations on performance measures is significant. In addition to providing numerous ideas for new or revised performance measures, stakeholders expressed concern about how several performance measures would be measured, and questioned the clarity of others.

The 62 stakeholder comments on this question were grouped in to the categories shown in Table 2-7.

Table 2-7 - Number of Comments by Major Category

Category	# of Comments
2.6.1 Performance measure process - comments and suggestions to improve process.	7
2.6.2 Refinement/additions to performance measures - comments specific to preliminary performance measures including refinements.	36
2.6.3 Ideas for new performance measures - suggestions for additional performance measures.	11
2.6.4 General comments - questions or concerns about measures organized by landscape, community and response.	8
Total	62

2.6.1 Performance Measures Process

Key ideas identified by stakeholders include:

- How do you plan to measure the performance measures? Some measures are viewed as subjective and difficult to quantify including employment rates, acres burned at acceptable fire intensity, and market changes.
- Terminology needs to be more clearly defined and concepts more clearly explained.
- What is the baseline you are using to measure from?

Comments:

- ✓ *Effective performance measures require quantitative evidence to determine progress toward achieving the goals. Performance measures that are trying to measure employment rates, market changes, decrease in fire costs, and acres burned at acceptable fire intensity levels, will be tough to quantify. What would be the performance target and how would these measures show how the strategy is working or not. Performance measures should track progress towards achieving objectives and should indicate how much or how well these are being met. Each performance measure should be looked at again to see if these four questions can be answered.*
 - 1) *What is being measured and how, what are the indicators that are being used?*
 - 2) *Why is it important to measure?*
 - 3) *What is the most recent available value to measure against for this indicator?*
 - 4) *What is the trend over time for this indicator and how should it be applied to determine effectiveness?*
- ✓ *To me, there are really only 3 issues - How well does each alternative restore and maintain fire-resilient landscapes, create fire adapted communities, and respond to wildfire. It might make things easier if you just keep the performance measures limited to those 3 issues. So, I am concerned as to how some of the performance measures will be calculated - or if they even can be calculated.*
- ✓ *Throughout the process we need to maintain SMART (specific, measurable, attainable, relevant, and timely) performance measures. For the most part I believe that is taking place.*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- ✓ *It is very important to know what performance measures are already in place that may not be reflected in the document. The current 'targets' for acres treated are out of date and have been problematic as identified during early development of the National Fire Plan.*
- ✓ *Shorthand bullet points are insufficient to understanding. Some terminology (e.g., "market changes") needs to be defined or concepts more clearly explained; terms like "increased" or "reduced" are relative, but the standards for comparison need to be explicitly stated.*
- ✓ *The scale of the problem is so vast, that the initial effort to create and measure solutions will fail. However, if management actions are monitored and evaluated periodically, these actions may prove beneficial. But suggesting that less homes will be lost where treatments have not been completed seems like a goal that will take several years if not decades to realize. What is the scale of the problem" How many millions of forests and grasslands need treatments? Can we actually operate at that scale? Probably not, so our efforts will need to be placed in a context where we can compare treated areas with non-treated areas. It seems clear that large, high severity fires will not diminish for some years to come.*
- ✓ *Performance level indicators are very important in each state and should be reflected, integrated into each the State's Forest Action Plan.*

2.6.2 Refinements to Preliminary Performance Measures

Comments that address specific preliminary performance measures are summarized below. In addition, proposed refinements or additions to the preliminary performance measure are also listed. The list starts with the preliminary performance measures that received the most comments and ends with the measures that received the least amount of comment.

Cost of wildland fire will decrease.

- ✓ *Costs of wildfires, whether suppression or damage, and several other performance measures are often dominated in some states by catastrophic fires that overwhelm many fire prevention and suppression responses. It is unclear how the performance measures will account for this effect and the differences between states.*
- ✓ *However, some questions may arise about the employment rate performance measure and the real-world application of figuring out how we can generate in a cost effective and timely way employment data related to forest resources, especially because employment is impacted by so many other regulatory and market factors.*
- ✓ *Does this include only suppression costs or also those costs associated with wildland fire use, mitigation et cetera?*
- ✓ *Does this include only suppression costs or also those costs associated with wildland fire use, mitigation et cetera?*

Refinements/Additions:

- *Estimated costs to the government displayed in each alternative including fire suppression costs, mechanical treatment costs, fire suppression rehabilitation costs, and BAER costs - or at least a qualitative comparison of costs to the government by alternative. Compare to baseline cost under a no action scenario.*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- What are the cost-plus-loss damages associated with fire, and to what extent has the national fire community contributed to increased cost-plus-loss?
- Performance element documenting "total cost of fire" basis. This measure could be different than the cost of wildfires.
- Large fire costs will become predictable within a defined range of variability.
- Overall reduction of costs for fuel treatments and wildfires.
- Value of investments/resources protected.
- Costs to private homeowners in WUI.
- Efficiencies/cost reduction from integration of programs.

Number of collaborative efforts focused on Fire-Adapted Communities will increase.

- ✓ *The same thing has happened in looking at the performance measures, so that "number of collaborative efforts focused on FAC's will increase" is a performance measure only under Alternative 3. It should be a performance measure for all four alternatives, if this is truly to be a cohesive strategy.*
- ✓ *Likewise, what if collaborative efforts don't increase, they just get more effective?*

Refinements/Additions:

- Diverse and integrated community capacities will increase.
- % of people living in fire adapted ecosystems with understanding and knowledge of how to live with fire.
- Measures the existence or passage of state laws that provide incentives for property owners or remove regulatory barriers.
- Require or articulate the need for effective CWPPs, not just approved.

Employment rates will increase.

- ✓ *The performance measure for economic factors (as related to forest resources) is ambiguous. Is this employment in the forest industry? Or is it related to employment in all facets such as forest resources, such as ecosystem restoration or various activities in WUI? To be valid in California, the broader interpretation is much more accurate.*
- ✓ *However, some questions may arise about the employment rate performance measure and the real-world application of figuring out how we can generate in a cost effective and timely way employment data related to forest resources, especially because employment is impacted by so many other regulatory and market factors.*
- ✓ *Can you really predict employment rates with any accuracy, given the randomness of wildfires and the fluctuations in costs and revenues that the mechanical treatments may or may not generate?*

Successful initial attack percentages where appropriate will increase.

Refinements/Additions

- Scalable response reduces long term emergency spending needs.
- Reduced need for initial attack.
- Initial response resources are knowledgeable of benefits and risks and respond accordingly.
- Point protection resources are assigned from project work on an as needed basis.
- Decrease in human caused wildfires.
- Increase in volunteer firefighters.

Landscape resiliency to wildfire will improve.

Refinements/Additions:

- Resilient landscapes are key to achieving goals in wildfire response and fire-adapted communities. Surely there are additional measures of resiliency that can be developed...an overarching "resiliency" measure doesn't or won't show the differences in emphasis between alternatives.
- Acreage maintained in a resilient state will increase.
- % of acres in maintenance condition vs. acres in need of restoration.
- Acres of private land more resilient due to treatment.

The number of FMAG declarations, which are FEMA declarations when structures threatened will be reduced.

- ✓ *I believe the FMAG declaration is not a consistent performance measure - too much variability among FEMA regions for their approval process. I believe adding "# of homes evacuated" to the number of communities impacted bullet would be a better measure.*
- ✓ *Alternatives with a performance measure involving FMAG applications/conflagrations needs to be modified to include critical infrastructure. "which are FEMA declarations when critical infrastructure and/or structures..."*

Acres burned at acceptable fire intensity levels will increase.

- ✓ *I think the word "acceptable intensities" is very subjective in the Matrix table so reconsider use.*
- ✓ *Difficult to measure and quantify.*

Refinement/Additions:

- Acres negatively affected by wildland fire will decrease.

Content Analysis

Market changes by virtue of the work will improve.

- ✓ *Difficult to measure and quantify*

Refinements/Additions:

- Contribution of forest products and resources to pay for or reduce project costs.

Number of large wildland fires not meeting management objectives will decrease

- ✓ *And what are the "management objectives" that fires may or may not meet - for some folks, every fire meets management objectives and to others, all fires are destructive and none meet any objectives.*

Number of acres and communities negatively affected by wildland fire within WUI will decrease

- ✓ *Alternatives with references to Fire Adapted Communities indicate a process in which they are counted, which indicates an assessment and determination of whether they are 'fire-adapted.' How do you see this occurring? Alternative #2 references "approved" CWPPs and I believe it should not include the word "approved." HFRA does not have an approval process or requirement for CWPPs.*

Homes lost where treatments have and have not been implemented will decrease.

- ✓ *The performance measure seems potentially hard to apply. Measuring the number of homes lost when treatments have and have not been implemented requires a treatment and no treatment database and/or uniform post-fire impact assessment of homes lost in wildfires. California does not have such a data set.*

Risk to landscapes is reduced

- ✓ *Objectives appear to be very subjective - hard to quantify such as "Risk to landscape is reduced." is this related to Fire Behavior, resistance to control, less fires starts, etc.?*

Landscape resilience will improve through wildfire suppression by protecting important values

Refinements/Additions:

- ✓ Acres of riparian areas and forest assets that are impacted by wildfire. The goal would be to minimize the increase or even reduce the acres.

2.6.3 Ideas for New Performance Measures

The following recommendations for performance measures were distinct from the preliminary performance measures and were considered "new" rather than refinements or additions used in Section 2.6.2.

- Reduction of acres infested with invasive species.
- Delisting/protection/meeting recovery plans of T&E due to land health improvements.
- How well are local land management/stewardship goals and objectives met?

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- Water yield is a key item in the west. Downstream water quantity/quality can be assessed by nearest water provider.
- Coordinated partnership roles and responsibilities are delineated, documented, and enacted.
- Project litigation rates will be reduced.
- Proponent agreements will be expanded.
- Assess the wildland fire training taken by local fire departments.
- The number of barriers or procedural obstacles removed.
- Information and experience is shared and integrated into the 5 year review process.
- Research/monitoring guides adaptation of practice.

2.6.4 General Comments on Performance Measures

The following comments on performance measures were sorted into landscape, community and response categories. The comments are wide-ranging from use of local forces for suppression to variability of values at risk to operational readiness.

Landscape Related Measures

- ✓ *Establishing one set of measurement criteria regardless of vegetation type does not account for the variations in vegetation and WUI in the 16 western states.*
- ✓ *Under alternative 4, the emphasis is on effective and quick response fire suppression efforts. There is minimal emphasis on landscape proactive measures on treating large landscape vegetation mechanically and in other ways to reduce intensity of wildfires thereby reducing potential costs. With a de-emphasis on treating the landscapes, it could likely result in an increase in unacceptable fire intensities not an increase in acceptable fire intensities. I think the word "acceptable intensities" is very subjective in the Matrix table so reconsider use.*

Community Related Measures

- ✓ *One basic question is how will the variability in the values at risk across the states be evaluated as the performance measures are applied. For example, ignitions, number of residence in the WUI and vegetation types associated with the WUI all vary significantly in California, and across the 16 western states.*
- ✓ *I think for these performance measures to be meaningful, communities should be able to consider what the baselines are. Because of climate conditions and insects, costs of fighting wildfires might go up dramatically regardless of successful implementation of this plan. Likewise, what if collaborative efforts don't increase, they just get more effective? We are all going to need to get more comfortable with the presence of fire on the landscape so let's gauge communities' current understanding of wildland fire use, Rx fire, etc. and then see how our activities are changing that perception. Otherwise, there will be years like this one where the political will to allow fires to burn is not there and we will spend lots of \$\$ and effort on getting in nature's way.*

Content Analysis

Response Related Measures

- ✓ *The second common performance element is degree of integration of stewardship and wildfire capacity in, at the field unit level. This gets at today's gordian knot situation, highly frustrating to many, of local community forces not being utilized and relying entirely on out of area capacity to address wildfire across the landscape. All public budgets, financial and community capacity will continue to be challenged.*
- ✓ *It is also unclear how the performance measure will evaluate the differences in the effectiveness and fire suppression philosophies of local, state and federal agencies in responding to wildfire?*
- ✓ *Additional concerns about the needs and roles of rural and volunteer fire departments were brought up many years ago and they are still not being addressed. These concerns are still valid and the limited capacity of local and state emergency response directly affect the ability to protect communities, natural resources and wildlife habitat, water quality/infrastructure. To rebuild citizen and community trust, elected leader support such an indicator, I think tied to units within a State context, in the State Forest Action Plan, would be most valuable as it is a changing landscape of experience we need to fully understand. Then in pre-season or much longer mentoring and gap analysis determining where one stands will be most important. It cuts down on expensive and sometime fatal miscalculations as scenario's unfold in one season or over many years. Maybe its called an Operational Readiness and may we could take examples from the military to go beyond where we are today. It's a "strategic operational readiness." Building in what's been accomplished in stewardship, landscape treatment work is key too.*
- ✓ *In looking at your performance table, it was surprising that alternative 1 did not have X's by more elements. Hard to increase the success of IA with no additional monies and not convinced it is worth the investment in most areas (there are exceptions and mostly where RFA's are primary responsible for fire response).*

2.7 Comments on Crucial Considerations

Stakeholders were asked to comment on the following question:

What are the crucial considerations we must bear in mind as we move from the Phase III analysis process into implementation planning?

Key ideas identified by stakeholders include:

- It may be a different verse but the refrain remains the same in terms of continued concerns about the ability to pay for and fund the amount of work at the scale necessary to make a difference on the ground. This applies to work on federal lands as well as the federal government's ability to provide financial assistance for work with communities and private lands.
- Additional concerns include the ability to fund partnerships and the high cost of analysis particularly on Forest Service lands.
- Continued concern about ability to keep up with maintenance work on treated acres.
- Stakeholders continue to focus on the need for and importance of collaboration. There is concern about sustaining the interest and commitment over time particularly if funding dries up.

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- Several stakeholders stated that wildland fire will and must play a larger role with landscape restoration.
- Having a Community Wildfire Protection Plan in place is one measure but how do you measure the effectiveness of the CWPP?
- *“Leadership at all levels needs to be engaged and provide direction for folks who are implementing these efforts.”*

A total of 36 stakeholder comments were grouped in to the categories shown in Table 2-8:

Table 2-8 Number of Comments by Major Category.

Category	# of Comments
2.7.1 Budget/Costs - comments on federal budget, cost of analysis, sustaining partnerships, and maintenance needs.	5
2.7.2 Collaboration - comments on importance of and sustaining collaboration.	9
2.7.3 Policy/Procedures - comments on NEPA/Wyden amendment, building codes, and wilderness management.	5
2.7.4 Implementation Issues - comments on wildland fire, prescribed fire councils, coordination with state assessments, priorities for funding.-	8
2.7.5 Education/Awareness - comments on success stories, building trust.	2
2.7.6 Other - comments on modeling and fire organization.	7
Total	36

2.7.1 Budget/Costs

Stakeholders continue to raise concerns about the ability to pay for the work at hand, the high cost of analysis on federal lands, the ability to establish and sustain partnerships, and long term maintenance needs.

- ✓ *The federal government is bankrupt and can no longer provide huge amounts of money to fund many of the WUI treatments on federal land that won't be able to pay for themselves. Likewise, the federal government cannot afford to provide huge amounts of money to partner with private land owners who need to treat their lands. Wildland fire to meet resource objectives, whether we like it or not, is going to be the main way we reduce fuels in the WUI because we can't afford to treat even a fraction of the acres that need treatment and we need to keep saying that over and over to the public. What we really need to do is focus and hone in on treating the acres in the WUI that we can afford to treat that will actually make a difference when the wildfire occurs, and we need to inform the public that they need to do their part in either making their homes and property defensible, or shut up and suffer the consequences of the future wildfire.*
- ✓ *Providing institutional and fiscal support to establish and sustain partnerships.*
- ✓ *Analysis takes all the funding on most of the projects. When the analysis is done there is no money left to do the implementation. One major issue with in the Forest Service.*
- ✓ *Another major issue is that some areas get more money based on population and political affiliations compared to an area that could get more work done and do good to restoring the landscape.*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- ✓ *Maintaining work from the last 10 years vs. restoration work that requires huge investment. Again, this needs to be balanced with where the priority is and what has been done.*

2.7.2 Collaboration

Stakeholders continue to focus on the need for and importance of collaboration. There is concern about sustaining the interest and commitment over time particularly if funding dries up.

- ✓ *“We must mobilize a nation. The cohesive strategy is about collaboration at the national and regional level, but the key is collaboration at the local level, supported by regional and national actors. We must consider how to build that capacity over time.”*
- ✓ *There are a number of statements about fire ready communities, but not much dialog on what it takes to get them there. With the drying up of fire safe funds the will, interest, and local ability is disappearing. We can have all the great statements about collaboration, but if the local can't or won't play we are dead in the water.*
- ✓ *Ground truthing with local and state agencies and through established collaborative groups working on these very same issues.*

2.7.3 Policy/Procedures

Comments include the appropriate role of NEPA on non-federal lands, the need for additional building codes, and fire policy related to fires leaving wilderness.

- ✓ *Under any alternative where federal funding could be spent on non-federal lands, the issue of appropriate NEPA will need to be addressed (See Wyden Amendment). There is confusion whether federal funds can be spent on non-federal lands and how the NEPA requirement will apply. This could impact design, feasibility, and implementation schedule of alternatives and how they relate to treating private lands to meet performance measures.*
- ✓ *A major improvement to being able to implement would be to get city, state and federal building codes in place that address the wildland urban interface. Colorado is a prime example of how houses are stacked together, the whole neighborhood will burn if one house catches fire. Laws need to be passed that landowners must clear their land and maintain a good defensible space. Landowners that do not maintain this area, needs to be fined or have an entity come in and do the work, then putting the cost on the tax role of that owner.*
- ✓ *NON-WILDERNESS AND FEDERALLY DESIGNATED WILDERNESS PRESERVATION STATUTORY REQUIREMENTS: This is related, appropriate for federal wild land agencies and relevant to any and all strategies. That is in federally designated wilderness preservation areas it is against the Wilderness Act of 1964 statute to pose management strategies in wilderness that allow fire to emerge from such Congressional designated wilderness areas into non-wilderness and identified roadless or unroaded areas, however some see this non-wilderness situation differently, nor may not be aware of Wilderness Act statutory management requirements.*

2.7.4 Implementation Issues

Implementation related comments focused on the need for more wildland fire, establishing Prescribed Fire Councils, the relationship of the Cohesive Strategy to the resource assessments completed under the Farm Bill, and priority funding to projects approved in CWPPs.

- ✓ *Obviously, but not described in the alt summary is the practicality of 1) mechanical treatment's limited scale of application on public lands, and 2) most lands HRV need more disturbance than mechanical or prescribed fire can attain. Wildland fire use needs to be acknowledged in all alternatives as the only practical alternative on large landscapes. Most suppression/mechanical treatment emphasis should be on WUIs and intensively managed timber lands with a dramatically reduced suppression emphasis away from these two types of lands. Continued suppression of fire on most landscapes during moderate burning conditions will result in stand replacement burns and extreme fire behavior during the most extreme weather conditions. Somewhere in this planning effort there needs to be acknowledgement of the need for more wildland fire use and emphasis on on-site risk reduction.*
- ✓ *Scale - focus on the combination of landscapes/watersheds vs. small parcels and/or one community.*
- ✓ *Increase the level of outreach - possibly State level meetings.*
- ✓ *I think Prescribed Fire Councils in every State should be a recommendation of the Cohesive Strategy. Having no fire is not an option, and empowering smarter more effective and efficient use of prescribed fire is a win for everybody. If we want fire adapted communities, we will have to support the use of prescribed fire. To support the use of prescribed fire we will have to have experts working together in ways that support scaling up Prescribed Fire, and that is the role of Prescribed Fire Councils.*
- ✓ *The Western Regional Assessment is a very detailed document that covers many issues. It is not clear how this document and the implementation strategies will relate, if at all, to state forest resource assessments done under the Farm Bill. In particular, it would help to explain the relationship, if any, to funding and project priorities done under the Cohesive Strategy to priority landscapes defined in the state assessments.*
- ✓ *States differ in how they approach the points in the Cohesive Strategy as applied in the Western Region. For example, some states use a more regulatory approach than others. Accomplishments can be both regulatory and non-regulatory in nature. The implementation planning should remain as neutral as possible to the variety of approaches taken by the states.*
- ✓ *California has a Strategic Fire Plan and many communities have Community Wildfire Fire Protection Plans (CWPP). If as part of implementation, the requirements for CWPPs or funding that is related to project requirements under these plans changes, steps should be taken to support projects prioritized in existing CWPPs.*
- ✓ *PRINCIPLES FOR EFFECTIVE FUEL REDUCTION - Is logging is the answer to reducing forest fire risk? This simple six point test can help distinguish between meaningful fuel reduction efforts and questionable efforts to increase commercial logging under the guise of fuel reduction. If the following basic principles are met, then the proposal is probably sincere and effective. If these guidelines are not met, then the project may be more about timber extraction and is likely*

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

to increase fire hazards, degrade forest health, and provoke conflict rather than reduce fuel or fire risk.

- 1. Ensure meaningful public participation.*
- 2. Prioritize treating high risk areas starting in the community zone.*
- 3. Ensure fuel reduction treatments are effective.*
- 4. Include environmental safeguards.*
- 5. Make rational and informed decisions.*
- 6. Ensure adequate funding.*

2.7.5 Education/Awareness

Comments include sharing success stories and building trust.

- ✓ *Using examples of successful implementation so stakeholders can understand the "pathway" to success and gain an understanding of desired outcomes while having a contact point.*
- ✓ *More emphasis & funding needs to be directed towards building public trust of wildland fire mitigation actions. Agencies are still having a difficult time with implementing projects on public ground & getting private land owners to accept grant funds to do fuel reduction. More successful efforts are being done through NGO & collaborative efforts but these efforts are more costly because of the extensive time involved to build public trust. I have witnessed public trust vested in projects done by NGO's who have spent the time to make it work. Now their projects are accepted based on their reputation. They use an approach based on eco system health which resonates well with private property owners. They have been criticized by professional fuels folks for not removing enough fuel on first entry but with rural residents, it is often a process of acceptance over time. They are changing a culture around wildfire & that doesn't happen quickly. Hopefully the Cohesive Strategy will stay the course for the long term.*

2.7.6 Other

Comments focused on the validity of and trust in the Modeling exercise, and fire organization.

- ✓ *The last comment is the validity of the Modeling done in the final phase and the trust that the results engender to the folks on the ground. If that is not there and it is not perceived as helpful to them all effort are lost.*
- ✓ *What are the alternatives to the current national fire system? How might states and localities manage fire without the involvement of the Federal Government? If the NIFC was defunded and shut down, how might states and localities benefit from that?*

3.0 Comment Evaluation

This section is designed to take a broader look at stakeholder participation provided during this extended comment period.

A combination of the timing of the comment period during a busy fire season and informal nature of notice to stakeholders may have limited the number of stakeholders participating in and providing comments. Still, the number of stakeholders more than doubled from the previous Western Region Strategy and Assessment outreach effort, increasing from 17 to 40.

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

Comment distribution actually improved for this effort compared to the previous stakeholder outreach effort for the Assessment. They more closely mirror the distribution of comments from Phase 2. Federal participation declined from 59% in the Assessment phase to 27 % in the Phase III effort. The one major exception is participation by non-governmental organizations which increased to 40% of the comment total. Many of these were “new voices” in the conversation. Comments from local governments, landowners/homeowners, forest industry and fire departments continue to be under-represented.

Table 3-1 – Number and Percent of Stakeholders Participating by Affiliation

Stakeholder Affiliation	Phase II		Assessment Comments		Phase III		Cumulative Totals	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Federal Government	76	31	10	59	11	27	97	32
Tribal	14	6	0	0	2	5	16	5
State Government	30	12	0	0	4	10	34	11
Local Government	23	9	1	6	2	5	26	9
NGO	38	16	4	24	16	40	58	19
Forest Industry	20	8	1	6	1	3	22	7
Fire Departments	18	7	0	0	2	5	20	7
Homeowner/Landowner	12	5	0	0	2	5	14	5
Other	14	6	1	6	0	0	15	5
Totals	245	100	17	100	40	100	302	100

Stakeholder perceptions regarding the Cohesive Strategy and Western Strategy and Assessment as a funding tool continues to persist. The underlying concept of the Cohesive Strategy and implementation plan as a unifying approach that relies on synergy and integration to increase implementation success is not evident in the comments provided.

4.0 Observations

The following observations were generated by the Content Analysis Team based on a combination of a review of comments, participation in Phase II outreach and content analysis, and their collective experience dealing with wildland fire management in the West.

1. Increase clarity on how the primary goals are addressed in each alternative - As explained by one stakeholder “...*alternative descriptions should explain how the level of emphasis on each of the cohesive strategy goals varies between alternatives and how a shift in emphasis might affect work on the other goals. Activities that contribute to all three goals will occur regardless of what goal is emphasized.*”
2. Clearly identify elements common to all alternatives - Elements from Phase I Guiding Principles and the “Proposed Elements in the West Common to All Three Goals” that apply to all alternatives need to be clearly stated. Improve the description of how these common elements apply to the alternatives.
3. Improve descriptions of the alternatives rather than creating a new “blended” alternative - An additional “blended” alternative is not recommended for the sensitivity analysis as this may blur distinctions between alternatives. Improve the clarity of the alternatives in terms of the inter-

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

relationship of the three goals (see #1). Improve the alternative 2 and 3 descriptions to more clearly distinguish the differences between the alternatives.

4. Reassess performance measures - Consider additional performance measures recommended by stakeholders, suggested additions and comments on existing performance measures. Test all performance measures using criteria provided by one stakeholder:
 - 1) *What is being measured and how, what are the indicators that are being used?*
 - 2) *Why is it important to measure?*
 - 3) *What is the most recent available value to measure against for this indicator?*
 - 4) *What is the trend over time for this indicator and how should it be applied to determine effectiveness?*

Note: Section 2.6 includes comments on and revisions to existing performance measures, ideas for new performance measures, and process related comments.

5. More clearly describe program budget relationships - Improve descriptions and information regarding the relationship of anticipated budget trends to the risk analysis. This applies to work on federal lands as well as the federal government's ability to provide financial assistance for work with communities and private lands. Because state, local and Tribal governments are experiencing budget shortfalls across many areas of the west, clearly describing how budget relationships are addressed is paramount.
6. Continue to aggressively pursue expanded stakeholder engagement - Although the number of comments from stakeholders not representing the Federal government increased, the numbers mirror those from the first Phase II forums and comment process (i.e., we have regained ground, but not expanded traction with a broader set of stakeholders). Actively engaging with other stakeholder groups will become more critical as work on implementation planning and action plans commences.
7. Don't leave good stakeholder implementation ideas behind - Review information provided during Phase I and Phase II to make sure stakeholder comments on implementation considerations are given the same weight as more the recent stakeholder comments in Section 2.7.

Appendix A - Preliminary Alternatives and Performance Measures Summary

The Western Region's Phase II Report stated the following regarding alternatives being investigated during Phase III:

“Throughout the Cohesive Strategy effort there has been a desire to offer alternative means of accomplishing the three national goals. Phase I identified the need to formulate regional alternatives during Phase II. However, as Phase II progressed it became apparent that a more effective way to move forward was through an interactive process during the analysis scheduled in Phase III. To that end, the WRSC has developed management scenarios that reflect the insights of the western region and facilitate transition into Phase III. These scenarios are not meant to be a complete picture of the future, but to characterize a range of possible and realistic futures in a way that highlights the interrelatedness of the national goals and the potential impacts of various prioritization and investment strategies across those goals and the related western objectives and actions. The scenarios are budget neutral – based on the reallocation of existing resources rather than an increase or decrease from current investment levels – but lend themselves to being combined with various investment support alternatives during Phase III of the Cohesive Strategy.”

The vision for the next century, as defined by the Cohesive Strategy, is “to safely and effectively extinguish fire, when needed; use fire where allowable; and as a nation, to live with wildland fire.” Phase I of the Cohesive Strategy adopted Guiding Principles and three national goals:

- Restoring and Maintaining Fire Resilient Landscapes
- Creating Fire Adapted Communities
- Responding to Wildfire

The Western Region Phase II Assessment describes objectives and actions designed to meet the national goals and implement the guiding principles and outlined “Management Scenarios” to be considered during Phase III. These management scenarios provide the basis for identifying preliminary alternative emphasis patterns to be analyzed during Phase III.

The National Science and Analysis Team in conjunction with the Western RSC will use the preliminary alternatives to inform their sensitivity analysis, which is an analytical technique used to support the development of recommendations, making them more credible and understandable. The performance measures will be used to both assess the effectiveness of the alternatives at meeting the goals of the Cohesive Strategy, as well as to gauge the projected outcomes of each alternative.

Alternative #1: Emphasizes landscape resiliency; activities are prioritized geographically and driven by opportunities to stimulate economic activity to the largest extent possible; over time significantly reduces/modifies wildland fire response. Wildland fire (all uses) will also be a major emphasis, mechanical fuels treatment will be used prior to wildland fire; aggressive wildland fire suppression is essential to protect values and mechanical treatment of vegetation is a primary tool used to achieve and maintain resiliency.

Performance Measures Emphasized and Expected Outcomes:

- Employment rates (as related to forest resources) will increase
- Landscape resiliency to wildfire will improve
- Number of communities impacted by wildland fire (both long and short term e.g. smoke, economies, homes/structures lost) will be reduced

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

- Number of large wildland fires not meeting management objectives will decrease
- Risk to landscapes will be reduced
- Departure from Historic Range of Variability (HRV) will be reduced
- Costs of wildland fire will decrease

Alternative #2: Emphasizes hazardous fuel treatments to create Fire-Adapted Communities; substantially increase fuels treatments by all means within WUI; treats the middle ground, directly connected to approved CWPP's or other planning efforts which have prioritized fuels treatment in WUI and middle ground; focus on the overall well-being of the community; over time significantly reduces/modifies wildland fire response.

Performance Measures Emphasized and Expected Outcomes:

- Employment rates (as related to forest resources) will increase
- Market changes by virtue of the work will improve
- Acres treated within WUI and middle ground by all means will increase
- Number of communities negatively impacted by wildland fire (both long and short term e.g. smoke, economies, homes/structures lost) will be reduced
- Homes lost where treatments have and have not been implemented will decrease
- The number of FMAG declarations, which are FEMA declarations when structures are threatened will be reduced OR INCREASED?
- Costs of wildland fire will decrease.

Alternative #3: Emphasizes creation of Fire-Adapted Communities through collaboration and self-sufficiency; similar to Alternative #2, additionally remove barriers to encourage and facilitate actions by private citizens and all stakeholders to increase collaboration efforts and results to protect values at risk; over time significantly reduces/modifies wildland fire response.

Performance Measures Emphasized and Expected Outcomes:

- Number of collaborative efforts focused on Fire-Adapted Communities will increase
- Employment rates (as related to forest resources) will increase
- Market changes by virtue of the work will improve
- Acres treated within WUI and middle ground by all means will increase
- Number of communities negatively affected by wildland fire (both long and short term e.g. smoke, economies, homes/structures lost) will be reduced
- Homes lost where treatments have and have not been implemented will decrease
- The number of FMAG declarations, which are FEMA declarations when structures are threatened will be reduced OR INCREASED?
- Acres negatively affected by wildland fire within WUI will decrease
- Costs of wildland fire will decrease

Alternative #4: Emphasizes effectiveness in wildland fire response; effective/efficient risk-based response that maximizes firefighter and public safety; wildland fire use for resource benefit blended with aggressive wildland fire suppression; protection of property/resources are emphasized, cost management which means wise use of funds; all hands/all lands; integrate local (including community) capacity including private sector resources; shifts in training, mobilization, decision making and does not inadvertently transfer risks; and pre-planning and situational preparedness are key.

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

Performance Measures Emphasized and Expected Outcomes:

- Acres burned at acceptable fire intensity levels will increase
- Successful initial attack percentages where appropriate will increase
- Landscape resilience will improve through suppression by protecting important resource values
- The number of acres and communities negatively affected by wildland fire (both long and short term e.g. smoke, economies, homes/structures lost) will be reduced
- Costs of wildland fire will decrease

Preliminary Performance Measures – The set of performance measures being considered includes all of those emphasized in the preliminary alternatives.

Comparison of Alternative Emphasis and Outcomes by Preliminary Performance Measure

The following table provides a comparison of alternative emphasis and expected outcomes by preliminary performance measures.

Preliminary Performance Measures	Alt 1	Alt 2	Alt 3	Alt 4
Employment rates will increase	X	X	X	
Market changes by virtue of the work will improve		X	X	
Number of large wildland fires not meeting management objectives will decrease	X			
Landscape resiliency to wildfire will improve	X			
Risk to landscapes is reduced	X			
Departure from Historic Range of Variability (HRV) will be reduced	X			
Acres burned at acceptable fire intensity levels will increase				X
Landscape resilience will improve through wildfire suppression by protecting important values				X
Number of acres and communities negatively affected by wildland fire within WUI will decrease	X	X	X	X
Acres treated within WUI and middle ground by all means will increase		X	X	
Homes lost where treatments have and have not been implemented will decrease		X	X	
The number of FMAG declarations, which are FEMA declarations when structures threatened will be reduced		X	X	
Number of collaborative efforts focused on Fire-Adapted Communities will increase			X	
Costs of wildland fire will decrease.	X	X	X	X
Successful initial attack percentages where appropriate will increase				X

Appendix B - Design of the Stakeholder Comment Opportunity

Development of the National Wildfire Cohesive Strategy (Cohesive Strategy) is designed to be an iterative process with affected stakeholders. The Western Region Strategy Committee (WRSC) was chartered under the Federal Advisory Committee Act to provide direct participation by stakeholders and to facilitate opportunities for broader stakeholder representation and engagement during the development process. The Cohesive Strategy is being developed using a phased approach.

Phase I was focused on defining goals and guiding principles of the Cohesive Strategy and was adopted by the Wildland Fire Leadership Council on November 10, 2011 and is available at:

http://www.forestsandrangelands.gov/strategy/documents/reports/1_CohesiveStrategy03172011.pdf

Phase II involved the efforts of three Regions (Northeast, Southeast and Western) to engage stakeholders in assessing opportunities for implementation of the national goals and to define actions. Regional Assessments, objectives and actions were consolidated into a single national report that was adopted by the Wildland Fire Leadership Council on April 18, 2012 and is available at:

http://www.forestsandrangelands.gov/strategy/documents/wfec/meetings/04nov2011/ntlreport_cssc_presentation/phase2_report_finaldraft20111028.pdf

Phase III involves creating a range of alternatives and performance measures that can be quantified using available science and information within each Region. This process is currently underway. Comparisons of alternatives using the best available science to evaluate the consequences between the different alternatives will illustrate the relationships between goals, objectives and actions within each Region. This information will then be used to develop implementation plans that serve as the basis to align the actions of agencies, tribes, individuals, and groups working toward common goals and objectives of the Cohesive Strategy. The Western Region's preliminary alternatives and performance measures are available at:

<http://sites.nemac.org/westcohesivfire/files/2012/06/AltsPerfMeasures.pdf>

The WRSC is seeking stakeholder review and feedback on preliminary alternatives and performance measures to help frame the analysis of Western Region objectives and actions during Phase III. Specifically, the WRSC would like your thoughts and comments to help:

- Shape the range of alternatives and emphasis areas within alternatives for implementation of the National Wildfire Cohesive Strategy in the Western Region. (Objectives and actions to be emphasized during the first five to ten years of implementation.)
- Identify and refine prospective performance measures or metrics associated with implementation. (Define measurable components toward success.)

The WRSC will use stakeholder feedback and comments during their interactions with the National Science and Analysis Team to refine preliminary alternatives and performance measures to be used in the Phase III analysis.

A comment form was used to solicit stakeholder feedback on the preliminary alternatives and performance measures. Stakeholders were requested to remember that their comments should align with the goals, objectives, and actions already adopted during Phase I and Phase II.

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

Stakeholder Comment Form

Preliminary alternatives are those options being used by the Science Team to inform their sensitivity analysis, which is a technique used to support the development of recommendations, making them more credible and understandable. The performance measures will be used to both assess the effectiveness of the alternatives at meeting the goals of the Cohesive Strategy, as well as to gauge the outcomes of each alternative.

- 1) How satisfied are you with the range of preliminary alternatives? (select 1-5)

[1]	[2]	[3]	[4]	[5]
Dissatisfied	Somewhat Dissatisfied	Neutral	Somewhat Satisfied	Satisfied

- 2) If you are not satisfied with the range of the preliminary alternatives to be analyzed, how should the range be expanded? Please keep your response relevant to the mix of objectives and actions described in the Western Regional Assessment (please see the national Phase II report for reference).

- 3) How well do the areas of emphasis in the preliminary alternatives align with issues you care about? (select 1-5)

[1]	[2]	[3]	[4]	[5]
Not at all Aligned	Slightly Aligned	Neutral	Mostly Aligned	Completely Aligned

- 4) Are there other areas of emphasis that you think should be included to address your issues and concerns? Please explain.

- 5) How well do the preliminary performance measures address topics and issues you are concerned with? (select 1-5)

[1]	[2]	[3]	[4]	[5]
Do not address	Slightly Address	Neutral	Mostly Address	Completely Address

- 6) Are there additional performance measures you recommend that would better address your issues or concerns? If possible, identify methods or data sets that can be used to measure these.

- 7) What are the crucial considerations we must bear in mind as we move from the Phase III analysis process into implementation planning?

Content Analysis

Western Region – Phase III Stakeholder Comment on Preliminary Alternatives & Performance Measures

Appendix C - METI Content Analysis Team

Members of the METI Content Analysis Team included:

- **Larry Timchak**, Natural Resource Management Specialist and consultant to METI, Inc., Kalispell, MT
- **Julie Woldow**, Communication Specialist and consultant to METI, Inc., Anchorage, AK
- **Jim Golden**, Senior Advisor for Natural Resource Management and consultant to METI, Inc., Sonora, CA
- **Steve Solem**, Senior Advisor for Natural Resource Planning and Inventory and consultant to METI, Inc., Missoula, MT