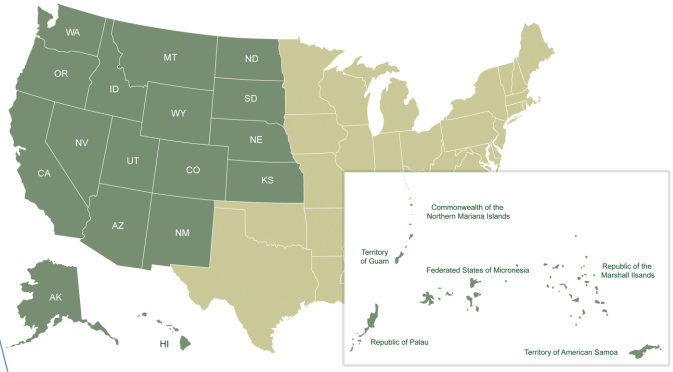
National Wildland Fire Management Cohesive Strategy
Western Region Strategy and Assessment

Content Analysis of Stakeholder Comments on the Western Regional Strategy and Assessment



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

April 30, 2012

Western Region Strategy and Assessment Stakeholder Comment Content Analysis Report

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1.0 Introduction

This report documents the comments and suggestions provided by stakeholders on the Regional Strategy and Assessment completed during Phase II of developing the National Cohesive Wildland Fire Management Strategy in the Western Region. The Strategy and Assessment was developed by the Western Region Strategy Committee (WRSC) and Working Group (WG) and completed in the fall of 2011. The Strategy and Assessment was distributed to a broad mailing list for review and comment; in addition it was posted on the Western Outreach website at http://sites.nemac.org/westcohesivefire/.

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, 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 II 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 and WG tasked members of their groups to identify evaluate the comments received and focus on those comments that provided suggestions and improvements consistent with the intent of the Western Strategy and Assessment. The goal was to make editorial changes and improve the Assessment before the National Science and Analysis Team (NSAT) initiated the trade-off analysis in Phase III. Members of this task group are identified in Appendix A.

Subsequent to those efforts, the WRSC employed the services of Management and Engineering Technologies International, Inc. (METI) to assist with evaluation of other comments and to prepare this content analysis report (see Appendix A).

1.1 Outreach Effort

This step in the process was designed to collect feedback from stakeholders on the draft Assessment and Strategy. This opportunity for comment reaffirms the WRSC's desire to provide transparency and provide stakeholders the opportunity to help shape the suite of potential solutions to best meet the West's needs. Stakeholders were asked to review the Western Region Strategy and Assessment and comment on the objectives and sub-objectives, actions and "broad policy questions" described in the document.

The WRSC posted an update to its outreach website in December 2011 soliciting feedback on the Assessment. E-mails were also sent to the outreach mailing list. The following email message was sent by Joe Stutler, Co-Chair of the WRSC on December 8, 2011 to his personal mailing list and typifies the personal distribution of this request to western stakeholders.

Greetings from the Western Region for the Cohesive Strategy. We are completing Phase II of our efforts and again want to express our gratitude for all your hard work and feedback. At this time we are asking for "stakeholder" feedback on the Western Assessment and have specifically focused on the objectives, sub-objectives, actions and broad policy questions. If you have previously provided feedback for the Western Assessment, here is your opportunity to see how we used [the information you provided] and [why we would like] to keep hearing from you. Please go to the following site: http://sites.nemac.org/westcohesivefire/updates/ for a complete update (See December 5, 2011), the complete report with appendices and we'd love to hear from folks. Also please share with any others that may want to provide us feedback on the Western Assessment. Happy Holidays folks, Joe

During December 2011 and January 2012, members of the WRSC and WG conveyed a similar message to an undetermined number of stakeholders via their personal networks (email and direct contacts) within the communities of interest that they represent.

1.2 Outreach Summary

The number of outreach participants and the perspective of their comments represent only those who elected to participate. The results of the outreach effort by number of participants, method of participation, and affiliation group, are presented in Table 1-1.

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

Stakeholder Affiliation	Number
Federal Government	10
Local Government	1
Non-Government Organizations	4
Industry	1
Other	1
Totals	**17**

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

1.3 Document Organization

This report documents comments received during the outreach effort including e-mailings 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 from the Western Assessment and Strategy.

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 outreach "gaps," potential focus areas, options to improve understanding of the Strategy, and information useful for interactions between the Strategic and Technical Groups interacting with NSAT during Phase III.

2.0 Content Analysis

Content analysis and the information presented below focuses on comments received from 17 stakeholders via email and correspondence in response to the request by the Chair of the Western RSC. Comments made to members of the WG or RSC via avenues other than those listed above are not included in the content analysis.

A total of 203 separate comments were made by 17 stakeholders in the documents reviewed. Comments were analyzed and classified as related to one of the following categories:

1) Suggestions/improvements within the intent of the original document and useful for defining options or alternatives for the NSAT and Western RSC and to consider, or may be used to develop performance measures or implementation actions for the West.

2) Suggestions that have merit, but are different than the intent of the WRSC in the original document, the WRSC will considered these later, following initial trade-off analysis and these comments may affect options, alternatives, and implementation actions or develop additional performance measures. This analysis would occur near the end of the Phase III effort.

3) Suggestions that identify immediate success opportunities that either mirror Phase II content analysis comments or it is clear that an immediate success opportunity exists for follow-up.

4) Suggestions that simply don't fit with the Western Assessment or merged National Phase II Report; these may be incongruent with the Flame Act or guiding principles of the Cohesive Strategy.

5) Suggestions that are beyond the authority or scope of the Western Region due to timing or previous agreements at a higher level.

Section 2.0 documents the classification of and summarizes comments provided for each of these five categories. Table 2-1 identifies the classification of comments in each category.

The Working Group content analysis team completed an initial sort of the 203 comments into separate categories. Because the WRSC agreed to the recommendations for the 81 comments in category 1, the METI content analysis team preserved all category 1 classifications. The METI team reviewed all remaining comments and reclassified them into appropriate categories and prepared the summary of comments of all categories presented in Section 2.0.

Table 2-1: Number of Comments by Category

Comment Category	Number of Comments
1 – Within Intent; Changes Made	81
2 – To be Considered in Phase III	85
3 – Immediate Opportunities	0
4 – Beyond Scope of the WRSC	16
5 – Beyond Authority	21
Total	203

Note: In some cases comments were classified into more than one category; the total above reflects potential double-counting of some comments.

Section 3.0 provides an evaluation of stakeholder participation relative to Phase II and an assessment of comments provided during this comment period.

The final phase of the content analysis process takes a "big picture view" to highlight key observations identified by the METI Content Analysis Team, which are presented in Section 4.0.

Note to Reviewers

The information derived from the content analysis represents only 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. It does, however, 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.

2.1 Suggestions and Improvements within the Intent of the Strategy and Assessment

This section includes suggestions and improvements within the intent of the original document, and useful for defining options or alternatives for the NSAT and Western RSC and to consider, or may be used to develop performance measures or implementation actions for the West.

Of the 203 comments received, 81 were determined to be in this category, which was further refined into the following sub-categories:

Subcategory and Description		Number
2.1.1	Comments that generated new sub-objectives or action items or significant revisions to existing sub-objectives or action items	19
2.1.2	Comments that resulted in editorial corrections that improve the wording in the Strategy and Assessment	44
2.1.3	Identification of unsubstantiated statements or inconsistent treatment of the same topic in different parts of the document	4
2.1.4	Other- includes recommendations to consider in the Phase III analysis and recommendations to the Communication team	14

The following excerpts represent the perspectives of those who commented on this topic. In some cases they have been edited for clarity. Direct quotes from commenters are *italicized*.

2.1.1 Summary of Comments that generated new sub-objectives or action items

Significantly revised or new additions are listed under the appropriate Goal and Objective. All but one major addition or revision falls under Goal 1 - Resilient Landscapes. One comment addresses Goal 3 - Wildfire Response. The following summarizes the 19 comments included in this sub-category. Comments are referenced to the Strategy and Assessment outline.

Goal 1 – Resilient Landscapes

Guiding Questions:

- ✓ Are quality Forest Plan approved fire prescriptions in place and experienced field people present on the unit to decide and implement where wildland fire can be used immediately to achieve resilient landscape conditions and Forest Plan Goals and Objectives?
- ✓ Have we postponed previously identified landscape vegetation treatments due to prioritizing the WUI in the past 10 years?

1.1. Objective: Actively manage the land and water to achieve healthy forest, watershed, and rangeland conditions.

- ✓ 1.1.3.3 Accelerate revision of federal LRMPs and FMPs that currently prevent fire management for multiple objectives, including resource benefit.
- ✓ 1.1.3.4 Update federal Land and Resource Management Plans and Fire Management Plans, especially those that specify "suppression only," to allow full range of management options (2009 Implementation Guidance), including management of fire for multiple objectives, including resource benefit.
- ✓ 1.1.8 Identify and map areas nationwide where changes in fire management and landscape treatments would bring the most needed improvements in landscape resilience.
- ✓ 1.1.4.2 Emphasize restoration of forests, rangelands, and watersheds at large landscape scales with a priority focus on the "middle ground." Actively use "middle ground" treatments to accelerate restoration and maintenance of landscape resilience.
- ✓ 1.1.9 Conduct assessments of fuel treatment effectiveness, including improvements in multiple dimensions: firefighter and public safety, ecological impact, watershed health, fire suppression costs, extreme fire behavior and contributions to local economies.

1.2 Objective: Protect landscapes and multiple values from the effects of unwanted fire.

- ✓ 1.2.1.1 Expand fire prevention programs to include the relationship between severe wildfire and landscape resilience, including water quantity and quality.
- ✓ 1.2.5 In advance of fire seasons, identify post-fire hazards, as well as places where managing wildfires for multiple objectives would bring benefits to landscape resilience. Clarify roles and responsibilities, position for taking advantage of fire opportunities and responding to impacts on landscapes and communities. Engage the local workforce.
- ✓ 1.2.6 Develop a methodology for resolving the conflict between the costs and benefits gained by aggressive initial attack and the costs and benefits gained from managing fires for multiple objectives including resource be

1.3 Objective: Improve interagency and stakeholder coordination and planning of actions that contribute to achieving landscape resiliency.

- ✓ 1.3.2 Launch a multi-agency workforce development initiative (including knowledge sharing, recruitment, training, incentives, mentoring and promotion) aimed at building workforce skills in collaborative fire planning and problem solving, stakeholder engagement, conflict management and group facilitation.
- ✓ 1.3.3 Design and commit to a focused multi-party monitoring component for treatment activities that allows effective data comparison across multiple jurisdictions, encourages managers and stakeholders to address key uncertainties about treatment effectiveness, and drives investments based on specific types of effectiveness.
- ✓ 1.3.4 Reduce administrative and operational barriers to landscape- level, cross-boundary resource management

Goal 3 – Wildfire Response

Guiding Question:

- ✓ Is there unified understanding of landscape, community, natural resource values and stewardship investments at risk and how to lower "total wildfire costs and impacts?

2.1.2 Comments that Resulted in Editorial Corrections that Improve the Wording

The team identified a total of 44 comments that helped improve clarity or added a key point that was missing. Changes are in bold italics; text with a strike through it was deleted. Examples include:

- ✓ Performance Measures: Risks to Landscapes, ***watersheds and natural resources*** is diminished.
- ✓ Emphasize the design and use of treatments that reduce hazardous fuels and contribute to resilient landscapes ***and healthy watersheds*** while meeting social and economic needs.
- ✓ *Basic premise:* A balanced wildfire response requires integrated pre-fire planning with effective, efficient, and coordinated ~~emergency~~ ***response***.
- ✓ A century of fire ~~suppression~~ ***exclusion*** has led to dramatic increases in forest stand densities and understory growth.
- ✓ Actively restore and maintain biodiversity, desired species ***(including threatened, endangered, and proposed listed species)***, and their habitat.
- ✓ Support land uses and industries (e.g., timber, grazing, fishing, hunting, tourism, recreation, and energy development using biomass removal) where ***they improve landscape resilience*** and support local economies.
- ✓ Assist private property ***and local government*** landowners in mitigating the effects of natural hazards resulting from wildland fire on public lands (e.g. flash flooding, debris-flows, loss of rangeland productivity, loss of timber.

2.1.3 Unsubstantiated Comments or Inconsistent Treatment of the Same Topic

Stakeholders provided comments that identified statements in the Strategy and Assessment that lacked supporting rationale or topics that were treated differently in different parts of the document, for example:

- ✓ Logging and grazing are never acknowledged as part of the problem in western landscapes and instead, without qualification, treated as important remedial practices.

- ✓ A specific requirement for the strategy is to incorporate policies that are "consistent with the recommendations described in recent reports of the Government Accountability Office regarding management strategies. However, the Phase I National Strategy did not cite any GAO report, let alone detail any effort to be consistent with any such report. Similarly, the Western Report does not mention, or discuss consistency with, any GAO report.

2.1.4 Other Recommendations to Consider in Phase III

Fourteen of the 81 category 1 comments defined options or alternatives for the Western RSC to consider, outlined key ideas to consider in the Phase III Assessment, or offered advice to the Communication team on important issues.

Referred to WRSC for resolution:

- ✓ The following recommendation to remove 1.2.3 from Landscapes and relocate it to Wildland Urban Interface goal.

    - Remove: 1.2.3. Identify, prioritize, and protect economic and commodity values and high priority natural resources (e.g., timber and grazing) across all ownerships.

- ✓ 2.2: "Identify, prioritize, and protect economic and commodity values and high priority natural resources (e.g., timber and grazing) across all ownerships"

The following comments were recommended for consideration/inclusion within the Phase III Report:

- ✓ *"Critical to any successful fire management and restoration strategy will be identifying priority areas where active management is needed so that resources can be focused on those areas*."

- ✓ *"If we're trying to get local residents to take a role, get local federal employees more on board. Right now they know nothing about the CS. And also, don't skip over some of the tasks that speak to working with local, county and state folks on issues, because if the science team does, and just stays in their room talking to one another, they'll never be successful. Items like 1.2.5 (Identify potential post-fire hazards in advance of fire seasons to clarify roles and responsibilities) and 3.5 (Develop community-based strategies to deal with post-fire hazards), and they need to be addressed with local input - from the beginning."*

- ✓ *"A specific requirement for the strategy is to incorporate policies that are "consistent with the recommendations described in recent reports of the Government Accountability Office regarding management strategies. However, the Phase I National Strategy did not cite any GAO report, let alone detail any effort to be consistent with any such report. Similarly, the Western Report does not mention, or discuss consistency with, any GAO report."*

- ✓ *"It is essential that decisions which are based on factual inquiry, as we trust most will be, should be held in abeyance until the science phase of this process can inform them."*

- ✓ *"The Western Report proceeds on a simplistic account of how landscapes have come to be damaged. The effort to remediate those problems that do exist are not likely to succeed if all major causes are not identified and addressed. Thus, not only logging of large trees and grazing need to be part of what is changed, but fire suppression itself. The report is schizophrenic on this subject, explaining the harm that fire suppression has caused while at the same time arguing for measures to make it more effective and rapidly applied. There is probably no more important challenge for wildfire management and landscape*

restoration planning in the west than identifying where to let fires burn, and how to add as much let burn acreage as possible with limited investment in active management".

- ✓ "*Comments regarding science team structure. Breaking out those 3 goals into separate committees does a disservice to them all. By combining fuels and suppression, leaving fire adapted communities on its own with a separate committee, you are allowing the hard science folks to duck some of the real issues, such as how to get the public on board. Sure, that's not their forte, but I feel they need to hear the issues as they move forward with their work. It will help connect the 3 goals better."*

- ✓ *"I believe that the biggest issue in the CS is that it includes more players than just the federal agencies - it's going to try and get private landowners to take a role in wildfire issues. It practically mandates this, but how is this going to be done??"*

- ✓ "*CWPPs need to be made a part of FMPs for federal agencies. There is no reason for locals to spend so much energy on their CWPPs every year if the feds don't even know they exist, much less have read or incorporated findings within them into their own work."*

The following comments were referred to the communication team for their consideration:

- ✓ *"Studies also show that by publicizing what, when, where, why, and how prescribed fire is going to occur, there is more acceptance and less complaints about the smoke. During this CS process, the feds should be publicizing what they are doing. It might still be too soon to start sharing what we are looking to accomplish, but by later this year it won't be."*

- ✓ *"I think that whomever is designing the communications program for the public needs to play up the concept of roles and responsibilities. We all will have them. Make the public part of the team. If they understand the big picture, the objectives, the R & R's and such, they will come to understand their role, and then take on the responsibility."*

- ✓ *"I think the current economic and political situations make it imperative that we are careful how we promote personal responsibility."*

- ✓ *"Money/grants isn't always the solution, though. We need the landowner to understand the whys and how's of what they are being asked to do on their land, so that when the funding goes away, they know they have to maintain the treatments!"*

- ✓ *"More communication and more information from the CS planners/developers is needed, because it isn't being sifted down to local levels, and so there are rumors, angst, and tensions between partners who normally work well together in their communities."*

- ✓ *"Item 2.4 is the toughest but most vital item of the CS. But, we or the feds can't "define" the private landowner's "role" in the CS. The private landowners need to be given enough education so that they discover their role, and accept it*."

The following comments were referred to WFLC to address because these changes were established at the national level and cannot be modified by a single region:

- ✓ Edit "National Outcome-based Performance Measure" to say *Risks to landscapes, "*watersheds and natural resources."*

- ✓ Responding to Wildfires. Add to the listed National Outcome-based Performance Measures the following additional measure.* "*Losses of significant natural resource values and stewardship investments are diminished*."

2.2 Suggestions different than the WRSC's intent to be addressed during Phase III

Comments received that were included in this category have potential utility during the trade-off analysis and interactions with NSAT during Phase III. Many responses stressed the need for more and better information about topics covered in the Assessment. Cooperation and planning was another common theme. There were numerous ideas and suggestions that can apply to the Implementation Plan for the Strategy, scheduled to be completed by March 1, 2013. Comments pertaining to procedure or law were also split out for their unique value. Finally, the need for science and the use of performance measures was also a recurring theme.

Of the 203 comments received, 85 were determined to be in this category, which was further refined into the following sub-categories:

Subcategory and Description		Number
2.2.1	Comments requesting clarification, definition or description of Strategy elements or terms	11
2.2.2	Comments pertaining to cooperation and planning	13
2.2.3	Comments about implementation ideas and options	21
2.2.4	Comments regarding procedure and law	5
2.2.5	Comments about science and performance measures	10
2.2.6	Suggested editorial changes to Strategy and Assessment outside the intent of the WRSC	25

The following excerpts represent the perspectives of those who commented on this topic. In some cases they have been edited for clarity. Direct quotes from commenters are *italicized*.

2.2.1 Clarification, Definition, Description

A number of respondents were concerned that definitions of specific terms or concepts were lacking in the document. Others required more background information about the use of fire on the landscape; the historical uses of the western landscape and how that affects the current situation; or even what qualifications might be required for personnel implementing prescribed fire. These comments may be useful for the development of Phase III and any implementation documents.

- ✓ A number of respondents thought there was a need to improve the explanation of the role of fire on the landscape.
- ✓ Commenters asked for improved definitions associated with fire use and landscapes.
- ✓ *"Where does private sector fit in this dispatch system? We believe that we should be considered a federal resource as that is the intent of our agreements/contract."*
- ✓ Some claim that the report falls short in that logging and grazing are not adequately recognized as contributing to the problems in our western forests.
- ✓ *"I think the current economical and political situations make it imperative that we are careful how we promote personal responsibility. Folks can barely afford food and heat, let alone doing a lot of work on their property and being told to put a new roof or siding on their home."*
- ✓ There is a need for a more comprehensive description of the pre-conditions for the use of prescribed fire.
- ✓ Improve the discussion of priority setting with regard to watershed values, habitat, forest structure, and other desired outcomes.

- ✓ One commenter said that the word “resilient” doesn’t resonate very well with WUI residents..
- ✓ *“We need the landowner to understand the whys and how’s of what they are being asked to do on their land, so that when the funding goes away, they know they have to maintain the treatments!”*
- ✓ There is a need to improve the definition of “resources” and “investment levels” when discussing the management scenarios.
- ✓ The Strategy should acknowledge that “stay and defend” is a valid choice for well-informed and prepared homeowners.
- ✓ Is there suggested guidance or verbiage in this document on how to address differences in management objectives of adjacent landowners or jurisdictions when they differ? Doesn't agency policy dictate this? (refers to “Guiding Principles from Phase 1” p.10 of WRSA)
- ✓ *"Fire management programs and activities are economically viable and commensurate with values to be protected, land and resource management objectives, and social and environmental quality considerations." Is there suggested guidance or verbiage in this document on how to address these issues when they differ? Doesn't agency policy dictate? (refers to “Guiding Principles from Phase 1” p.10 of WRSA)*

2.2.2 Cooperation and Planning

These are examples of comments received from respondents that remain concerned about the level of coordination among stakeholders and government agencies as the strategy is developed and implementation planning proceeds.

- ✓ *“My comment is to reinforce that fire management is one team working toward multiple ends, and that each of those ends are interconnected These three objectives should be intertwined so that the document demonstrates how improvement in one area facilitates improvement or changes in another.”*
- ✓ Community Wildfire Protection Plans (CWPP’s) need to be incorporated into federal land management plans.
- ✓ *“There needs to be a way to easily input the values identified in CWPPs into programs like WFDSS. If a community identified ‘X’ as an important value to protect, then: 1) they need to have identified a method/means to protect that resources; and 2) whoever is the IC and IMT must recognize that particular value and plan accordingly.”*
- ✓ Agency employees need better information about the Cohesive Strategy; it’s not getting down to local levels.
- ✓ *“Many government facilities are unprepared for wildfire events and have done little in utilizing Firewise concepts for protection in the event of wildfire events, thus requiring significant expenditure of suppression funds in the protection of such facilities.”*
- ✓ *“Greater federal representation will not create better plans nor will it foster ownership on the part of communities. There needs to be an entirely different tact in gaining participation from individuals and communities; and until that happens there likely will be little improvement in community buy-in and action on the plans.”*
- ✓ Communities with effective CWPP’s should receive priority funding or resources in the Strategy.
- ✓ “*Incentive programs created under the original NFP funding and guidance were a great idea but never fully utilized. Perhaps this is due to the fact they were not consistent or well-advertised. We should*

consider one consistent incentive package, promote it, and share the resulting successes broadly (in the media campaign)."

- ✓ *"Studies also show that by publicizing what, when, where, why, and how prescribed fire is going to occur, there is more acceptance and less complaints about the smoke. During this CS process, the feds should be publicizing what they are doing. It might still be too soon to start sharing what we are looking to accomplish, but by later this year it won't be."*

2.2.3 Implementation Ideas and Options

There were numerous comments and suggestions about how to move forward on implementing actions to meet the goals of the Strategy. These ranged from specific advice about contracting or the use of private fire management services to how to articulate actions that are needed to meet the goals.

- ✓ Need to make better distinction between market-based solutions for restoration versus market-driven prescriptions, which may put landscapes at further risk.
- ✓ One person suggested a need for a liability protection program for those who use fire on the landscape.
- ✓ "*Small, piecemeal projects will not achieve the kinds of changes needed to promote healthy, fire-adapted ecosystems. A cohesive strategy must ensure commitments to collaborative efforts and partnerships that have developed in improving landscape health*."
- ✓ There's a need to increase the emphasis on the impacts of invasive species on our ability to meet the three CS goals
- ✓ Need to clarify which active management techniques will achieve positive results on the ground. The report references fishing, hunting, etc. as creating positive results when these really are positive outcomes created by good land management.
- ✓ *"If we are EVER going to change the way people live and build in the WUI, it's going to be with a frank, honest, innovative, public education campaign using both traditional (TV and radio) and non-traditional (social) media. This idea is not new but is well supported in the 2005 and 2009 QFRs so let's get after it before we hear it again in the 2013 QFR. Think Super Bowl ad! Let's save the dollars we plan on spending to analyze, model and contract experts in Phase III and instead finally make a true investment in education."*
- ✓ IDIQ (indefinite delivery indefinite quantity) contracts have been very successful in many places in the West. These should be considered in any implementation plan.
- ✓ One commenter reminds us that private fire resources are often available to a community to do restoration work.
- ✓ The Wildland Fire Lessons Learned Center can be utilized to meet the intent of 3.2.2, a national health and safety reporting system.
- ✓ *"The Western Report repeatedly suggests that resources have been mistakenly focused on the immediate vicinity of homes, and seeks to equate other areas of human use and interest with communities as priorities. For example, expressing concern over "an artificial distinction between 'home' and 'homeland' that often results in a lower priority for active management of the larger landscape". This distinction is anything but artificial and should indeed be utilized to set priorities."*
- ✓ We need to work toward the goal of "every burnable acre has a fire management plan". This will help solve coordination, planning, efficiency, safety and other issues.

- ✓ "*Would like to see the opportunity for local members of the private industry have a place at the table on a local level as well as state and national We have historically made up over 40% of the fire resources national and as much as 70% in the NW we are big partner in this effort."*

- ✓ Some commenters question the need for developing a new AD hiring system; they do not see what is "broke or needs fixing."

- ✓ Communities can increase their self-reliance through the use of existing programs such as VFA and RFA. Those programs are underfunded, however.

- ✓ "*The items 1.4.1 through 1.4.5 have all been implemented for a number of years with at best only marginal success. Rather than list these things here, why not provide some consideration of why success has been limited and provide guidance geared toward improving the results?"*

- ✓ One suggests establishing interagency/multijurisdictional Type 3 Incident Management Team standards to help meet the Fire Response objective (3.4.2.3).

- ✓ *"It lacks the sense of how it will play out, and be carried out in the field. How it will be managed and what effect it will have on programs at the field level seem to be conspicuously missing elements."*

- ✓ Training and qualifications for firefighters need to be reviewed and applied consistently across all cooperators.

- ✓ *"Critical to any successful fire management and restoration strategy will be identifying areas where active management is needed so that resources can be focused on those areas. While the report recognizes the need for priorities, it contains assertions about priorities that are counter-factual or fail to help distinguish the areas most in need of treatment."*

2.2.4 Procedure and Law

Some commenters were focused on the laws or regulations that guide or dictate the development of the Strategy or the actions that might be required to meet the goals of the strategy. The FLAME Act was referenced a number of times. These comments should be considered as Phase III proceeds and as any implementation plans are put forward.

- ✓ There needs to be an emphasis on a requirement for properly qualified personnel to develop and implement sound fire management plans.

- ✓ Some identified a need to accelerate the revision of federal land and resource management plans in order to facilitate the development of local fire use policies.

- ✓ The FLAME Act requires references to GAO reports regarding management strategies. There are no references to any of these in the report.

- ✓ The FLAME Act (Sec. 503(6)1) requires that treatments focus on the most cost effective means for allocating fuels dollars. The WUI is not the most cost effective use of funds.

- ✓ Some commenters feel that it is not appropriate for this strategy to discuss the need to change environmental laws. .

2.2.5 Science and Performance Measures

As Phase III of the Cohesive Strategy proceeds, a number of commenters had science questions or advice or concerns about topics that are directly related to how science will be used or incorporated into

the process. Performance measures were also noted as areas of interest. These comments may be useful to the science team for guidance or for areas that need further clarification.

- ✓ Establish the scientific basis for the relationship among insect and disease epidemics, dead trees and wildfire risk.
- ✓ Establish the scientific basis for post fire restoration needs.
- ✓ How will "risk to landscapes" be measured?
- ✓ Regarding the development of trade-offs and alternatives, use caution to not over-rely on models. Incorporate successful experiences and ground based knowledge as well.
- ✓ One commenter questions how we will assess the performance measure: "Injuries and loss of life to the public and firefighters are diminished".
- ✓ How will the "risk of wildfire impacts to communities" be measured?
- ✓ Regarding the goal of "all jurisdictions participate in making and implementing safe, effective, efficient risk-based wildfire management decisions": What will be the determined level of success and how will it be measured?
- ✓ Re: Performance measure "Response to shared jurisdiction wildfire is efficient and effective" By whose account? What classifies efficient and effective?
- ✓ *"I've recently seen surveys where WUI folks do not feel they are at risk, even though they've got a CWPP, have had fires in the area and have received lots of outreach & education over a period of 5-10 years. Why not? Many have done defensible space - do they think this makes everything OK? I'd sure like to see more research on this ASAP in areas that definitely are in high-risk areas."*

2.2.6 Suggested Editorial Changes Outside the Intent of the WRSC

These comments were editorial in nature and not substantive, and outside the intent of the Strategy and Assessment. Comments were not considered for further analysis. In some cases they suggested wording changes to material in the Assessment. In other cases, they questioned the proper location for the topic within the document. There were 25 comments in this group.

An example: *Change question from: "Can wildland fire be used…… as a tool to achieve resilient landscapes?" to …"Can vegetation treatments be used…… as a tool to achieve resilient landscapes?"*

Or: *Remove 1.2.3. Identify, Prioritize, and protect economic and commodity values and high priority natural landscapes (e.g., timber and grazing) across all ownerships. Objective does not contribute to landscape resilience and fits better in Fire Adapted Communities.*

2.3 Immediate success opportunities

This category includes suggestions and information useful in identifying immediate success opportunities that either mirror Phase II content analysis comments or it is clear that an immediate success opportunity exist for follow-up.

No comments were identified that fall within this category.

2.4 Suggestions Contrary to the Cohesive Strategy Guiding Principles or FLAME Act

The following comments and suggestions simply don't fit with the Western Assessment or merged Phase II Report; that are incongruent with the FLAME Act or guiding principles of the Cohesive Strategy.

The 16 comments included in this category all address Goal 3 – Wildfire Response. The following excerpts represent the perspectives of those who commented on this topic. In some cases they have been edited for clarity. Direct quotes from commenters are *italicized*.

Comments Related to Goal 3 – Wildfire Response

- ✓ Objective 3.3.2: Create a new emergency hire system to replace the existing AD authority.
- ✓ Objective 3.3.3.2: Eliminate unprotected areas. The reason these areas exist is typically because residents and land-owners don't want to pay for protection.
- ✓ Objective 3.3.3.5: Expand FEMA fire mitigation and disaster assistance grant programs
- ✓ Objective 3.4.2.1: Enhance and support capability of state and local governments (through Federal Excess Property Program, Volunteer Fire A, Rural Fire Assistance and State Fire Assistance)
- ✓ Ensure that each Geographic Area has sufficient Type 3 interagency incident management teams to respond to wildfires that are managed either by the GACC or nationally during preparedness levels 4 and 5.

2.5 Suggestions and Comments beyond the Scope of the WRSC's Authority/Charter

The following suggestions were deemed to be beyond the authority or scope of the Western Region due to timing or previous agreements at a higher level. A total of 21 comments were included in this category. Most focused on Goal 3 – Wildfire Response.

The following excerpts represent the perspectives of those who commented on this topic. In some cases they have been edited for clarity. Direct quotes from commenters are *italicized*.

Comments Related to Goal 1 – Resilient Landscapes

- ✓ Scenario 1: The broad categories outlined in this scenario are too focused on the use of wildland fire and do not address rangeland scenarios adequately. NEPA documents identify the objectives for landscapes and these three broad categories do not describe ones that I have seen in most BLM RMPs.

Comments Related to Goal 2 – Fire Adapted Communities

- ✓ 2.3.9 Clarify how the Federal register list of Communities at Risk (CARs) will be used in the future. Ensure a process is established in each state to update the list for use in planning or…abandon the concept of CARs to be replaced by CWPP mapping of high risk areas.

Comments Related to Goal 3 – Wildfire Response

- ✓ Re: 3.3.1.4 "Clarify and communicate roles and responsibilities to enhance partnerships, recipient resource sharing, and acceptance of cooperator standards for training and resources"
- ✓ Re: 3.4.2.3. Ensure that each Geographic Area has sufficient Type 3 interagency incident management teams to respond to wildfires that are managed either by the GACC or nationally during preparedness levels 4 and 5

- ✓ Re: 3.4.4. Protect fire managers from legal and criminal liability when performing their jobs within delegated authority and approved operating policies and procedures.
- ✓ Re: 3.4.5. Maximize the use of technology to evaluate the numbers of coordination and dispatch centers including locations.
- ✓ Re: 3.4.7.1. Develop a western compact between states and tribes that allows for incident business payments to take place.
- ✓ *"Seems like a big theme going on behind the scenes here is the need for comprehensive, simple, logical, multi-jurisdictional/interagency fire management plans. This was once the lofty goal of the National Fire Plan (remember "every burnable acre will have a fire management plan"?) We have some models that work just fine right now (UIA, etc.), but we haven't adopted them yet, and we certainly haven't included any non-federal entities or resources in them. I think if we could work towards this large, complicated, but necessary goal, it would take care of everything else. If we had a truly interagency/all responsible party FMP that covers every acre, it would solve coordination, planning, dispatching, efficiency, safety, and funding issues, but maybe I'm too idealistic."*
- ✓ Re: 3.4.8. Develop site-specific community-based strategies to reduce emergency spending over time (interagency agreements, closest forces, training, etc.).
- ✓ Re: 3.4.7.3. Develop an appropriate cost apportionment and variable agreements administered through a national payments system that would include wildfire and all-risk response.

3.0 Comment Evaluation

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

A combination of the timing of the comment period (over the holidays) and informal nature of notice to stakeholders may have limited the number of stakeholders participating in and providing comments. Table 3-1 compares the number of commenting stakeholders by affiliation, whether they are represented on the WRSC/WG and whether they commented during Phase II.

Table 3-1: Number of Stakeholders Commenting By Affiliation Group

Stakeholder Affiliation	Number	Represented on RSC/WG	Commented in Phase II
Federal Government	10	10	1
Local Government	1	0	0
Non-Government Organizations	4	1	1
Industry	1	0	0
Other	1	0	1
Totals	**17**	**11**	**3**

What is notable about the composition of those who commented are the number represented on the WRSC or WG. In some instances, members of the WRSC or WG provided comments as opposed to directly participating in the dialogue and interactions leading up to the development of the Western Strategy and Assessment.

The overall composition of stakeholder participation during Phase II and those providing comments on the Strategy and Assessment are similar (see Table 3-2). The percentage of participation by stakeholder

groups has not significantly changed and the focus on Federal Government stakeholders actually increased although these stakeholders are more geographically dispersed and expand representation within the Bureau of Land Management.

Participation by non-governmental organizations increased and there were "new voices" in the conversation. However, over 60% of those who commented represented Federal agencies and bureaus.

Table 3-2 – Number and Percent of Stakeholders Participating by Affiliation

Stakeholder Affiliation	Phase II		Assessment Comments		Cumulative Totals	
	Number	Percent	Number	Percent	Number	Percent
Federal Government	76	31	10	59	86	33
Tribal	14	6	0	0	14	5
State Government	30	12	0	0	30	11
Local Government	23	9	1	6	24	9
Non-Governmental Organization	38	16	4	24	42	16
Industry	20	8	1	6	21	8
Fire Departments	18	7	0	0	18	7
Homeowner/Landowner	12	5	0	0	12	5
Other	14	6	1	6	15	6
Totals	**245**	**100**	**17**	**100**	**262**	**100**

A closer examination of comments from stakeholders representing "new voices" can be used to show the degree of alignment of these stakeholders with the Western Region Strategy and Assessment. In particular, the number of comments falling in Categories 2, 4 and 5 by definition indicate where there is not alignment. Table 3-3 shows the distribution of comments received from those who have not previously participated.

Table 3-3 – Alignment of Stakeholders Representing "New Voices"

Affiliation	Cat. 1	Cat. 2	Cat. 3	Cat. 4	Cat. 5
NGO – Group 1	2	11			
NGO – Group 2	3	3		1	2
NGO – Group 3	3	4		2	2
Local Government	15	8		2	4

As in the Phase II, information on success stories or immediate actions was limited. In fact, no comments were identified as falling within this category, although the solicitation for comments asked for this information.

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. Aggressively Pursue Expanded Stakeholder Involvement - A more focused, deliberate approach to expanding stakeholder involvement and engagement needs to be pursued. The WRSC's "engagement calendar" and "trip reports" present a method for recording the WG and WRSC members' face to face interactions with stakeholders, to clarify which stakeholders are aware and involved with the Strategy, and identify any gaps in this effort. Specific assignments by WRSC members may be necessary to significantly expand the dialogue with stakeholders beyond the results from Phase II and the comment period. This effort is consistent with the Western Region's Phase III Program of Work Items 2 and 3.

2. Seek to Gain Understanding and Support Among "New Voices" - "New voices" are supportive of the Cohesive Strategy goals but disagree with the orientation of the Western Strategy and Assessment in one or more goals. As with the first recommendation, a targeted approach to increasing stakeholder engagement must achieve improved understanding and support for the Western Region's Strategy and Assessment, or as a minimum, a better understanding on the part of the WRSC of stakeholder concerns that need to be addressed during implementation planning. This effort is also consistent with the Western Region's Phase III Program of Work Item 3.

3. Enhance Awareness and Understanding within Communities of Interest Represented by the WRSC and WG - Within the communities of interest represented by the WRSC/WG, awareness and understanding of the Cohesive Strategy and the Western Strategy and Assessment is inconsistent across stakeholder demographics. The "trickle down" approach is not effectively reaching these parties who are essential to successful implementation. Agency leadership, particularly within the federal land management agencies, needs to step up their emphasis and attention to the CS in order to gain better understanding, acceptance, and support by their local staff for the process and the product. This in turn will have a positive influence at the sub-region and community level in promoting the iterative and collaborative nature of the strategy and its expected outcomes.

4. Implement a Focused Effort to Identify Success Stories and Lessons Learned - Success stories were not identified during this opportunity to comment. To improve on what was collected in Phase II a more focused effort needs to be pursued to identify and communicate successes and lessons to stakeholders. Lessons learned do not always come from success stories so they may be solicited separately. This effort is consistent with the Western Region's Phase III Program of Work Item 3.

5. Capture Comments That Inform Implementation Planning - A common refrain from those who commented in the past raised concerns about how their comments would be used during the process. A specific effort was made by the WRSC/WG to ensure comments from Phase I that were not used directly in that effort were reflected in the starting point for the West. A similar effort needs to occur to ensure comments useful for implementation are acknowledged and used as a foundation for implementation planning.

6. Communicate a Clear Description of Expected Outcomes - Engagement in a nebulous process involving "trade-off" analysis, strategies, and implementation action plans is not compelling to many stakeholders. They (along with some members of the WRSC and WG) are unclear where this is all going. They would like to know what difference this will make at the local level! The WRSC must increase the understanding and the relevance of this effort to stakeholders to improve their participation in the effort. A more explicit "vision" of the expected outcomes of

the Strategy is important. Without a compelling reason for engagement, the collaboration and coalition-building necessary for successful implementation may not occur.

Appendix A – Content Analysis Team

Members of the Working Group who participated in analysis of comments and identified comments provided by stakeholders included:

- Joe Freeland, Bureau of Land Management
- Carol Daly, Western Governor's Association/Flathead Economic Policy Center
- Alan Quan, Forest Service
- David Seesholtz, Forest Service
- Bill Tripp, Intertribal Timber Council
- Dana Coelho, Forest Service
- Kevin Ryan, Forest Service

Members of the METI Content Analysis Team included:

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

Appendix B – Comment Opportunity Notice and Distribution

Members of the Western RSC and WG provided an undetermined number of stakeholders notice of the opportunity to comment on the Western Strategy and Assessment via email and personal notification during December 2011 and January 2012. The following information was provided to stakeholders regarding the opportunity to comment on the Western Region Strategy and Assessment.

From the Co-Chair of the Western Region Strategy Committee:

> *Greetings from the Western Region for the Cohesive Strategy. We are completing Phase II of our efforts and again want to express our gratitude for all your hard work and feedback. At this time we are asking for "stakeholder" feedback on the Western Assessment and have specifically focused on the objectives, sub-objectives, actions and broad policy questions. If you have previously provided feedback for the Western Assessment, here is your opportunity to see how we used [the information you provided] and [why we would like] to keep hearing from you. Please go to the following site: http://sites.nemac.org/westcohesivefire/updates/ for a complete update (See December 5, 2011), the complete report with appendices and we'd love to hear from folks. Also please share with any others that may want to provide us feedback on the Western Assessment. Happy Holidays folks, Joe*

From the Western RSC Outreach Website (*http://sites.nemac.org/westcohesivefire/updates/*) December 2011:

> *The WRSC would like to take this opportunity in the spirit and intent of the iterative stakeholder process to solicit focused feedback on the Western Regional Assessment and Strategy. To strengthen the overall effort, we are asking all stakeholders – those who have already participated and those who may be new to the process – to focus on the West's current objectives, actions, and policy questions that have been identified to support the three national goals. We are looking to strengthen and add to this outline in order to identify as accurately as possible a suite of potential solutions best meets the West's needs.*
>
> *The content to focus on is pages 20-34 of the Western Regional Assessment and Strategy.*
>
> ***The policy questions** that have been identified are the bullets in the shaded descriptions for each goal area and address the policy context within which the objectives and actions have been developed. Are there key ideas missing? Can issues be framed more effectively?*
>
> ***The objectives and actions** were developed through an iterative process and informed by stakeholder outreach. They address decision-making and planning efforts that are local, regional, and national in scope and are to be used in Phase III to construct and analyze different management scenarios. Are there key ideas missing? Can issues be framed more effectively?*
>
> *Although there are many ways to phrase the complex challenges and opportunities in the West, we have a fairly high level of consensus on much of the text in the Western Regional Assessment and Strategy and are not soliciting general editorial suggestions.*