



Dear WRSC Members:

The Council of Western State Foresters (CWSF) respectfully submits the following comments in response to the Draft Western Regional Action Plan (Draft Action Plan) released on January 18, 2013. Our members include seventeen western state foresters and the six U.S. Flag pacific island foresters. The CWSF supports science-based forest management that serves the values of society and ensures the health and sustainability of western forests.

The CWSF appreciates the efforts of the Western Regional Strategy Committee as it works to shape the Draft Action Plan to ensure that the National Cohesive Fire Management Strategy (Cohesive Strategy) works for the West. We believe that the Cohesive Strategy will be successful so long as it recognizes the uniqueness and diversity of western state forestry agencies and the existing relationships between federal partners, local government and non-governmental organizations. To build on these unique strengths, implementation actions should compliment and reinforce locally identified needs and focus action and resources where there is willingness and a desire to get work done. This includes ensuring that the implementation actions included in the Draft Action Plan are of the highest priority.

The CWSF fully supports the three goals of the Cohesive Strategy. Further, we recognize that adequate funding is needed to achieve the goals. The CWSF believes that efforts around the three goals should be focused as outlined below:

- Restore Resilient Landscapes: active management of federal forest lands and restoration of all – public and private – forest lands.
- Fire Adapted Communities: reform of the insurance industry and support from the Federal Emergency Management Agency for fire adapted communities.
- Response to Fire: aggressive initial attack in the wildland-urban interface and interagency management of large fires.

Again, the CWSF recognizes and appreciates the efforts of the Western Regional Strategy Committee in the development of the Draft Western Regional Action Plan for the Cohesive Strategy. We offer the following comments and concerns for the specific action items identified in the Draft Action Plan.

Sincerely,

Caitlyn Pollihan
Executive Director

Overarching Recommendations and Actions

Recommendation: O.1.

Action O.1.1 Maintain and enhance communication efforts.

Task 1: Review and update the existing communications strategy to reflect a shift from planning to implementation. Identify and develop community collaborative information need.

Comment/Concern: This Task is where the communications objectives should come from in order to elicit specific action from specific audiences. Who is going to be responsible for funding a communications coordinator?

Task 2: Establish a position to coordinate communications efforts.

Comment/Concern: Clarification of who the communications coordinator would work for and how the position would be funded is needed. It would be helpful to include this type of information up front in the action plan to ensure that there is support from the beginning. Potential workload needs to be examined to ensure that a full time position is necessary. Is it the intent of the Wildland Fire Executive Committee (WFEC) that Regional Cohesive Strategy Committees be employers with responsibilities of supervision and budgets?

Task 4: Educate the public on the Cohesive Strategy and the Western fire issues, including the ecological benefits of fire and the impacts, such as smoke management.

Comment/Concern: How would this be done? What message would be developed and who would be responsible for conveying it and to what audience? Is this Task 4 a sub-task of Task 3 (speakers bureau)?

O.2.

Action O.2.a Establish Western Coordination Organization

Comment/Concern: Should the charter and membership of the WFEC be expanded rather than create a new, permanent entity that is supposed to drive and/or govern Cohesive Strategy implementation? The value of the Western Regional Strategy Committee (WRSC) is in strategy development. The Cohesive Strategy is not a program unto itself, rather a way to make decisions about existing programs and priorities.

Task 1: Hire a regional coordinator and secure funding from WRSC membership organizations.

Comment/Concern: It is not clear if the intent is to have all WRSC membership organizations contribute funding. If so, how much per organization? If not, do membership organizations that do not contribute funding get less of a say in decisions? Where would this position be 'hosted' and how would job duties and responsibilities be decided?

O.2.

Task 4: WRSC leadership convenes program leads from Landscape Resilience, Fire Adapted Communities, and Wildfire Response to identify mechanisms for integration and removal of barriers.

Comment/Concern: It is not clear in this Task where the program leads will come from. Will they be Federal Program, State Program, Local Government, and/or NGO representatives?

Action O.2.b Align agencies for Cohesive Strategy implementation

Comment/Concern: What is meant by align? Does it apply to all stakeholders or only the federal agencies?

Task 1. WRSC convenes Fish and Wildlife Service, NOAA Fisheries, EPA leadership, and other regulatory agencies to present the Cohesive Strategy; determine where management and regulatory areas of responsibility intersect; and develop a process to resolve inherent conflicts identified.

Comment/Concern: Convening federal agencies is a tough process and does the WRSC have the ability to call these groups together? Is this authority spelled out in an MOU, Charter or Agreement? 'Enlist the services of' may be better terminology and allow for more buy-in from the agencies themselves.

Action O.3. Establish collaboration incentives.

Task 2. Establish a rewards process for successful collaboration that leads to results.

Comment/Concern: It is unclear what 'rewards' means. Is a reward different from incentive? If a rewards process is established, is it a monetary reward, a recognition reward and/or a basis for receiving future grants? What is successful collaboration? Is the process agency specific or is it universal? Do the authorities exist to implement this type of a reward system?

Is the desired end result to collaborate or is it to get something accomplished on the ground? Grant programs already exist that consider collaboration as a decision item in awarding the grant and it is possible to reframe this task to leverage these grant programs.

Task 3. Establish a pool of grant funds to allocate to successful collaboration efforts to further landscape restoration and community protection work associated with CWPPs or tribal equivalent.

Comment/Concern: Creating a pool of grant funds brings up many questions: Who manages the pool? Who contributes to the pool? Would these be new funds or funds from other current grant funds?

Lead: NACo/WIR

Comment/Concern: How was this lead selected? Would this be in coordination with the groups that currently run competitive grant processes to make any necessary changes? Is there currently a lack of collaboration on non-federal land activities, or is this supposed to be about the federal grant process?

O.4 Emphasize landscape treatments where existing collaborative groups have agreed in principle on management objectives and areas for treatment, and encourage and facilitate the establishment of collaborative groups.

Comment/Concern: This is very similar to O.3. Would this be a review where states look at federal grants at a state level or states looking at state grants at a state level? From a state perspective, all actions need to be linked to Forest Action Plans (FAPs) and use those FAPs to identify places where collaboration would be beneficial. Many states already have put this into action. The assumption that WRSC exists as a governing body of these types of actions and reviews adds a layer of governance that may reduce the amount of work being accomplished on the ground.

O.4.b. Action: Prioritize federal land management program dollars consistent with this recommendation and the prior action.

Comment/Concern: Collaborative Forest Landscape Restoration Program (CFLRP) already does this for US Forest Service (USFS). O.4 is focused on grants, but this action item is focused on federal lands – which is the focus? If the prioritization of federal land management program dollars is the focus, the federal agencies in question should be the ‘lead’ that is identified; NACO or any other non-federal organizations cannot take responsibility for prioritizing another groups budget.

Action O.5.a.: Establish a tribal collaborative landscape management program with pilot projects.

Task 1. Leadership between DOI and USDA to determine funding allocation. Pursue permanent authorization to enable transfer of funds from all federal sources to DOI to compact programmatic actions and activities (consultation, partnership collaboration, implementation, research, monitoring, and adaptation) through the Indian Self Determination and Education Assistance Act.

Comment/Concern: Is ‘compacting’ the correct mechanism? This seems confusing. Some compacts require legislative and congressional approval. Permanent authorization to transfer these funds would require the same.

Action O.5.b. Evaluate Pilot Program

Task 3. Glean successes and barriers from pilot projects and recommend modification/permanent authorization of the CFLRP (2009 omnibus). Extend overarching contract/agreement mechanisms to 20-year terms.

Comment/Concern: Why is CFLRP in this section? Who will evaluate the pilot projects and what measures will be used to evaluate success?

O.8. Formalize a comparative risk model that includes federal, state, and local costs. Use the model to complete a trade-off analysis and establish a risk base point.

Comment/Concern: How do these differ from the regional Wildfire Risk Assessments that are already happening in the three regions of the US? This risk model should be built using that information as a source.

Landscape Resiliency Recommendations and Actions

Action 1.1.b.: Maximize state and local authorities for implementation

Task 1: Encourage tax and other incentives for work done on non-federal lands to implemented landscape resiliency projects.

Comment/Concern: Is this referring to federal or state tax laws, or both? State tax policies typically rest with state agencies other than the state forestry agencies and would require legislative action. The Western Governors’ Association might be the more appropriate member to lead this action?

Task 3: Reclassify grant funds utilized to reduce fire risk on private lands as conservation activities (in the tax codes).

Comment/Concern: This task seems to be about the federal income tax code. A lead organization that has the ability to address this change should be identified.

Action 1.1.d.: Simplify administrative processes regarding the exchange of funds between and within agencies.

Task 1. Develop simple administrative procedures that allow for easy interagency exchange of funds between and within the Departments of

Agriculture and Interior and Bureaus for the collaborative efforts to implement landscape restoration activities and treatments.

Comment/Concern: This type of procedure would need appropriations language for authorization. The use of the word simple does not fit with the rest of the task as this any type of interagency fund exchange in the current fiscal climate would be a considerable task.

1.3. Expedite coordinated identification, prioritization, and restoration of damaged landscapes as a result of natural disturbances including: insect/disease, hurricanes, wildfire, invasives, changing climatic conditions. Identify where investments are not likely to restore areas to assist in prioritization of resources.

Action 1.3: Expedite Restoration of Damaged Landscapes

Task 6: Conduct preplanning and pre position additional suppression resources in areas with potential unwanted consequences from natural disturbance.

Comment/Concern: In these times of tight budgets and scarce resources – prepositioning suppression resources on the basis of natural disturbance in case there is a fire start is not a task that the Council of Western State Foresters can support. Identifying potential risk and fire behavior in pre-attack or mobilization plans at the local level with local jurisdictions should be encouraged. This is more appropriate in the Response Section.

Action 1.6. Examine legislative related barriers that are impeding implementation of collaboratively developed landscape health related projects and pursue reform of the existing process to increase our effectiveness in active forest and rangeland management. (e.g., Endangered Species Act, Equal Access to Justice Act, National Environmental Policy Act (NEPA)). Encourage and enlist local, state, tribal, and federal environmental regulatory agency representatives to participate actively in collaborative efforts to restore resilient landscapes.

Comments/Concerns: If the WRSC as the lead on this action has federal members on it in decision making roles, there is concern that rules preventing lobbying will get in the way of allowing this action to move forward. If this action involves the examination of barriers and there is another lead that works to address those barriers that need legislative action, that might reduce those concerns.

Goal 2: Fire Adapted Communities Recommendations and Actions

Action 2.1. Accelerate achievement of fire adapted communities using existing tools; offer incentives, such as chipping/disposal and incentives for collaboration, etc.

Comments/Concerns: Many of the tasks identified in this section are already being implemented at the state level.

Task 2.: Expand scope of existing grant and cost share programs and pursue additional revenue sources for private land work to strategically reduce wildfire risk and make communities more fire-adapted in areas of moderate, high and extremely high wildfire risk. Projects prioritized in CWPPs or tribal equivalent, both in and around communities and in “middle lands” further from communities, should receive priority status.

Comments/Concerns: Expanding the scope of existing grant and cost share programs without identifying new funds to add to those programs is not possible. The CWSF has concerns with this expansion, especially when the current fiscal climate is considered.

2.2 Develop and promote local collaborative capacities to implement fuels treatments and respond to fires.

Comments/Concerns: Not sure which states’ Fire Marshals and/or Emergency Management agencies have capacity, expertise and authority to complete the listed tasks. State Foresters should be listed in Other Collaborators.

2.3. Enhance campaigns to educate the public about the urgent need for homeowners to take action, including having statewide, Western, and other coordinated campaigns. Use videos such as how to protect homes from fire, the importance of fire in nature, and the need to live with fire.

Comments/Concerns: This seems to fit well under O.1 rather than in this section.

2.5. Continue to create and update Community Wildfire Protection Plans (CWPPs) identifying new funding sources. Be sure to include offices of emergency management and local response entities, such as the sheriff’s offices in planning efforts. Update CWPPs in areas that have had a wildfire event.

Comments/Concerns: Much of this already going on or completed. Don’t understand where Task 9 fits into the rest of these items.

Action 2.5: Support CWPP Development and Implementation Resources

Task1: Identify grant sources which can be used or repurposed administratively or legislatively to support development and updating of CWPP efforts at the local level.

Comments/Concerns: It is not clear who is doing the identification and decision making of which grant sources would be ‘moved or repurposed.’ Is it grant funds at the national level or grants that have been allocated to states? The risk here is robbing Peter to pay Paul, working with limited resources, and making decisions based on ‘popular’ programs without consideration of how well existing programs are working or the consequences of reducing or repurposing existing support.

Lead: State Foresters

Comments/Concerns: Is the lead the National Association of State Foresters or the Council of Western State Foresters?

2.6. Review and modify requirements for technical and financial support of communities through Federal Emergency Management Agency (FEMA), i.e. NEPA administrative processes, and applications for funding.

Action 2.6: Streamline and Coordinate FEMA Support Programs

Task 1. FAC workgroup reviews FEMA programs and makes recommendation to FEMA leadership related to pre-event mitigation needs and administrative processes.

Comments/Concerns: Can this be done this year? Our assumption is that this is not addressing FEMA FMAG (Fire Management Assistance Grants) and is instead focused on other FEMA programs.

Goal 3: Wildfire Response Recommendations and Actions

3.1 Improve response effectiveness by convening state level groups to identify where fire protection exists for all areas within each state. Eliminate unprotected areas by establishing/extending jurisdictional responsibilities. Response cooperators in each state should identify those voids and negotiate to ensure that every acre within the state has designated protection. Promote realignment of protection responsibilities to the organization that is best suited to provide protection (e.g., block protection areas, offset protection agreements, protection contracts).

Comments/Concerns: Increased prepositioning/repositioning of suppression resources based on predictive services is making Task 3 less feasible where it results in initial attack capability being compromised.

Lead: GACG

Comments/Concerns: GACGs do not have authority to direct other agencies; they only have authority within their own agency. This might create issues relative to fire protection planning.

3.4. Increase capacity where necessary in order to improve overall local response effectiveness and reduce the need for external (non-local) resources.

Action 3.4.b. Action: Increase connectivity of DHS and related Bureaus grant capability with the Cohesive Strategy.

Other Collaborators:

Comments/Concerns: Need to add USFS as the knowledgeable entity for grant funding going to and passing through the state forestry agencies.