United States General Accounting Office

GAO

Testimony

Before the Subcommittee on Forests and Forest Health, Committee on Resources, House of Representatives

For Release on Delivery
Expected at 3:00
Tuesday, July 31, 2001

THE NATIONAL FIRE PLAN

Federal Agencies Are Not Organized to Effectively and Efficiently Implement the Plan

Statement of Barry T. Hill
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GAO-01-1022T

Mr. Chairman and Members of the Subcommittee:

We are here today to discuss the results of our preliminary work for you on the implementation of the National Fire Plan. The National Fire Plan is not a single, cohesive document. Rather, it is composed of various documents, including (1) a September 8, 2000, report[1] from the Secretaries of the Interior and of Agriculture to the President of the United States in response to the wildland fires in 2000; (2) congressional direction accompanying substantial new appropriations for wildland fire management for fiscal year 2001; and (3) several approved and draft strategies to implement all or parts of the plan.

In addition, the 1995 federal wildland fire management policy,[2] updated in 2001,[3] provides the philosophical and policy foundation for federal interagency fire management activities conducted under the National Fire Plan. Incorporating the policy's guiding principles and recommendations into the plan presents unusual, if not unique, challenges to traditional organizational structures. Wildland fires do not recognize the administrative boundaries of federal land units. Therefore, the policy requires coordination, consistency, and agreement among five federal land management agencies in two departments—the National Park Service, the Fish and Wildlife Service, the Bureau of Land Management, and the Bureau of Indian Affairs within the Department of the Interior and the Forest Service within the Department of Agriculture. Moreover, an effective strategy to reduce the risk of wildland fire requires a full range of fire management activities, including management-ignited fires (prescribed fires) and other fuel treatments, such as thinning. Therefore, the policy requires an interdisciplinary approach in which federal fire managers must forge new working relationships with other disciplines

[1] *Managing the Impact of Wildfires on Communities and the Environment*, A Report to the President In Response to the Wildfires of 2000, Secretaries of the Interior and of Agriculture (Sept. 8, 2000).

[2] *Federal Wildland Fire Management Policy and Program Review*, Report to the Secretaries of the Interior and of Agriculture by an Interagency Federal Wildland Fire Policy Review Working Group (Dec. 18, 1995).

[3] *Review and Update of the 1995 Federal Wildland Fire Management Policy*, Report to the Secretaries of the Interior, of Agriculture, of Energy, of Defense, and of Commerce; the Administrator, Environmental Protection Agency; and the Director, Federal Emergency Management Agency, by an Interagency Federal Wildland Fire Policy Review Working Group (Jan. 2001).

within the agencies, including those responsible for wildlife and fisheries and vegetation and watershed management.

Federal and state officials estimate that $30 billion will be needed over the next 10 years to implement the National Fire Plan. Toward this end, the Congress appropriated almost $2.9 billion for Wildland Fire Management for fiscal year 2001. At your request, we are reviewing whether the five federal land management agencies are spending this money in an efficient, effective, and timely manner. To date, we have focused our work primarily on efforts to reduce dangerous accumulations of hazardous fuels and firefighting management and preparedness.

In summary, the preliminary information we have gathered to date suggests the following:

- Human activities, especially the federal government's decades-old policy of suppressing all wildland fires, including naturally occurring ones, have resulted in dangerous accumulations of hazardous fuels on federal lands. As a result, conditions on 211 million acres, or almost one-third of all federal lands, continue to deteriorate. According to the federal wildland fire management policy, these conditions have increased the probability of large, intense wildland fires beyond any scale yet witnessed. Coupled with the explosive growth of people and structures in areas where human development meets or intermingles with undeveloped wildland—the wildland-urban interface—these fires will, in turn, increase the risk to communities, watersheds, ecosystems, and species. They will also place in jeopardy the lives of the public as well as the lives of the firefighters charged with controlling or suppressing them.
- The National Fire Plan represents the latest effort to address wildland fire on federal lands. Two conditions set this effort apart from prior efforts to reduce the risk of wildland fire: (1) congressional committee recognition of the need to sustain increased funding for wildland fire management in future fiscal years and (2) congressional committee direction to reduce the risk of wildland fire in the wildland-urban interface. However, although the federal wildland fire management policy is intended to provide the policy foundation for the National Fire Plan, many of the policy's guiding principles and recommendations—especially those that present challenges to traditional organizational structures—have not been implemented. Lacking the coordination, consistency, and agreement called for in the federal wildland fire management policy, the five federal land management agencies cannot ensure, among other things, that they (1) are allocating funds to the highest-risk communities and ecosystems, (2) are adequately

prepared to fight wildland fires in 2001, and (3) can account accurately for how they spend the funds and what they accomplish with them.

- The failure of the five federal land management agencies to incorporate into the National Fire Plan many of the federal wildland fire management policy's guiding principles and recommendations can be traced to their reluctance to change their traditional organizational structures of federal wildland fire management. As a result, the five agencies continue to plan and manage wildland fire management activities primarily on an agency-by-agency and unit-by-unit basis. Moreover, although implementing the National Fire Plan in an efficient, effective, and timely manner will require an interdisciplinary approach, federal fire managers and managers in other disciplines within the agencies—including those responsible for wildlife and fisheries and vegetation and watershed management—have been reluctant to forge the necessary new working relationships.

Conditions on Federal Lands Continue to Deteriorate

For a number of years, both the Congress and the administration have been made aware of the increasingly grave risk of wildland fire posed by the buildup of brush and other hazardous vegetation on federal lands.

The 1988 wildland fires that burned Yellowstone National Park and millions of acres of other public and private land resulted in a 1994 report by the statutorily established National Commission on Wildfire Disasters.[4] The Commission stated:

> "The vegetative conditions that have resulted from past management policies have created a fire environment so disaster-prone in many areas that it will periodically and tragically overwhelm our best efforts at fire prevention and suppression. The resulting loss of life and property, damage to natural resources, and enormous costs to the public treasury, are preventable. If the warning in this report is not heeded, and preventative actions are not aggressively pursued, the costs will, in our opinion, continue to escalate."

The Commission observed: "The question is no longer if policy-makers will face disastrous wildfires and their enormous costs, but when." The when came that very year. The 1994 fire season resulted in 34 fatalities, including 14 firefighters on Storm King Mountain in Colorado. These deaths, coupled with a growing recognition of the fire problems caused by the

[4] *Report of the National Commission on Wildfire Disasters* (1994). The National Commission on Wildfire Disasters was established on May 9, 1990, by the Wildfire Disaster Recovery Act of 1989 (Pub. L. No. 101-286).

accumulation of hazardous fuels, resulted in the first comprehensive federal wildland fire management policy for the departments of the Interior and of Agriculture. The December 1995 policy stated:

"The challenge of managing wildland fire in the United States is increasing in complexity and magnitude. Catastrophic wildfire now threatens millions of wildland acres, particularly where vegetation patterns have been altered by past land-use practices and a century of fire suppression. Serious and potentially permanent ecological deterioration is possible where fuel loads exceed historical conditions. Enormous public and private values are at high risk, and our nation's capability to respond to this threat is becoming overextended."

In the aftermath of the escape of a prescribed fire at Cerro Grande, New Mexico, in May 2000, the Secretaries of the Interior and of Agriculture requested a review of the 1995 federal wildland fire management policy and its implementation. According to the 2001 update, as a result of excluding fire from federal lands, conditions on these lands continue to deteriorate. The update observed that the fire hazard situation is worse than previously understood and stated:

"The task before us—reintroducing fire—is both urgent and enormous. Conditions on millions of acres of wildland increase the probability of large, intense fires beyond any scale yet witnessed. These severe fires will in turn increase the risk to humans, to property, and to the land upon which our social and economic well being is so intimately intertwined."

The 2001 policy update also observed that the fire hazard situation in the wildland-urban interface is more complex and extensive than was understood in 1995. According to the update, the explosive growth in the wildland-urban interface now puts entire communities and associated infrastructure, as well as the socioeconomic fabric that holds communities together, at risk from wildland fire. The update concluded that the fire problem in the wildland-urban interface would continue to escalate as people continue to move from urban to wildland areas in the twenty-first Century.

Implementation of the National Fire Plan Lacks the Coordination, Consistency, and Agreement Called for in the Federal Wildland Fire Management Policy

The National Fire Plan represents the latest effort to address wildland fire on federal lands. Two conditions set this effort apart from prior efforts to reduce the risk of wildland fire: (1) congressional committee recognition of the need to sustain increased funding for wildland fire management in future fiscal years and (2) congressional committee direction to reduce the risk of wildland fire in the wildland-urban interface. However, although the federal wildland fire management policy is intended to provide the policy foundation for the National Fire Plan, many of the policy's guiding principles and recommendations—especially those that present challenges to traditional organizational structures—have not been implemented. Lacking the coordination, consistency, and agreement called for in the federal wildland fire management policy, the five federal land management agencies cannot ensure, among other things, that they (1) are allocating funds to the highest-risk communities and ecosystems, (2) are adequately prepared to fight wildland fires in 2001, and (3) can account accurately for how they spend the funds and what they accomplish with them.

Highest-Risk Communities Have Not Been Identified

The Department of the Interior and Related Agencies Appropriations Act for Fiscal Year 2001 required the Secretaries of the Interior and of Agriculture, after consultation with state and local firefighting agencies, to publish jointly in the Federal Register a list of all urban-wildland interface communities, as defined by the Secretaries, within the vicinity of federal lands that are at high risk from wildfire, as defined by the Secretaries. Despite this directive, the five federal land management agencies currently do not know how many communities are at high risk of wildland fire, where they are located, or what it will cost to lower the risk. Therefore, they cannot set priorities for treatment or inform the Congress about how many will remain at high risk after appropriated funds are expended.

Here is what we have learned to date.

Prior to publishing an initial list of communities, the Secretaries of the Interior and of Agriculture did not define either "urban-wildland interface communities" or "within the vicinity of federal lands that are at high risk from wildfire." On January 4, 2001, the Secretaries published an initial list in the Federal Register of 4,395 communities. However, as stated in the notice, (1) 11 states did not respond or did not have lists of communities available, (2) 5 states indicated that they did not have any at-risk communities, and (3) each of the 34 states that did identify communities used "criteria it determined appropriate for selecting communities at risk."

In February 2001, Interior and the Forest Service issued guidance intended to refine and narrow the initial list of communities. The guidance defined wildland-urban interface. It also identified three criteria for evaluating the

risk to wildland-urban interface communities (fire behavior potential; risk to social, cultural, and community resources; and fire protection capability) and risk factors relating to each criterion. In addition, the guidance included a discussion of fire behavior potential that provided some general information on identifying fire risk. However, the guidance did not specifically identify federal lands that are at high risk from wildland fire rendering it difficult to identify urban-wildland interface communities within the vicinity of such lands. Without this definition and with the criteria and risk factors subject to broad interpretation by the states, the list of at-risk communities ballooned to over 22,000 in May 2001. In addition, two states with lands in the fire-prone interior West—California and Idaho—did not revise their initial lists of communities on the basis of the February guidance, stating that all of their communities on the initial list should be considered high-risk.

At that time, the Secretaries of the Interior and of Agriculture said they intended to continue to work collaboratively with states, tribes, local leaders, and other interested parties to identify and set priorities for specific treatment projects. However, rather than continue to work toward a jointly published list of communities, Interior and the Forest Service went their separate ways.

From the list of over 22,000 communities, Interior has identified 545 communities near its lands that it determined to be at "highest risk" by assigning numeric values to the risk factors in the February 2001 guidance. However, 278—or over half—of the communities are in three southeastern states—Georgia, North Carolina, and Tennessee—that are not prone to severe wildland fires. Conversely, since California and Idaho did not revise their initial lists of communities on the basis of the February guidance, Interior did not include any communities in these two fire-prone states. (See app. I and II.)

Meanwhile, by October 2001, the Forest Service plans to develop its own separate list of highest-risk communities from the list of over 22,000. However, it plans to allow its nine regional offices to work individually with states within their boundaries to develop nine separate lists of highest-risk communities.

In the interim, a group of federal, state, and private individuals has prepared a draft 10-year strategy to implement the National Fire Plan.[5] This draft strategy emphasizes not only locally driven priority-setting but also locally driven budget development, project planning and implementation, monitoring, and reporting. However, without nationwide criteria to differentiate risks among wildland-urban interface communities in different states and geographical regions, the National Fire Plan will become little more than a funding source that will not allow for accountability at the national level and will not ensure that federally appropriated funds are being spent in those wildland-urban interface communities at the highest risk of wildland fire.

Neither the Forest Service Nor Interior Is Fully Prepared to Fight Future Wildland Fires

The coordination, consistency, and agreement required by the federal wildland fire management policy is also missing from efforts by Interior and the Forest Service to ensure that the nation is fully prepared to fight future wildland fires.

For instance, the five federal land management agencies cannot agree on the priority to be given to preparing fire management plans. Since 1995, federal wildland fire management policy has required that every federally managed area with burnable vegetation must have an approved fire management plan. These plans are critical to determining preparedness needs for fighting wildland fires because they identify, among other things, which wildland fires should be suppressed and which should be allowed to burn. However, 6 years later, only the 60 units managed by the Bureau of Land Management have fully complied with the policy. Of the remaining 1,323 units managed by the other four federal land management agencies, 768—or 58 percent—still do not have a plan that complies with the policy. These 768 units encompass about 121 million acres—or 31 percent—of all the acres with burnable vegetation managed by the four agencies. (See app. III.) Moreover, although wildland fire does not recognize the administrative boundaries of federal land units, federal fire management plans have been, and continue to be, prepared on a unit-by-unit basis.

Similarly, rather than using one computer model to identify their fire-preparedness needs, the five federal land management agencies use three different models. The Forest Service, the Bureau of Land Management,

[5] *A Collaborative Approach for Reducing Wildfire Risks To Communities and the Environment: Ten-Year Comprehensive Strategy* (Draft for Signature)(May 2001).

and the Bureau of Indian Affairs use one model to determine their preparedness needs, the National Park Service uses another, and the Fish and Wildlife Service uses a third. Moreover, we have concerns about all three models because they (1) do not consider conditions on non-federal lands in the wildland-urban interface and elsewhere, and (2) stop at the administrative boundaries of land units as opposed to providing the broader-scale planning embraced in the federal wildland fire management policy.

Further, using the existing fire preparedness models, all five of the federal land management agencies requested funds to hire, develop, and support additional fire managers and firefighters, and all five have made substantial progress in hiring the additional personnel. (See app. IV.) However, in addressing firefighting equipment needs, it is a different story. Even though the Congress gave the agencies the opportunity to request the equipment needed to be fully prepared to fight future wildland fires, the agencies did not identify their funding needs in a coordinated or consistent fashion. Instead, each agency identified its own equipment needs. Two of the agencies—the Forest Service and the Fish and Wildlife Service—did not request the funding needed to procure the firefighting equipment called for in their existing fire preparedness models. So for these two agencies it is not clear when they will reach the firefighting capacity envisioned with the funding provided for fiscal year 2001. The Forest Service failed to ask for about $44 million that it needs to procure hundreds of pieces of equipment, including fire engines, bulldozers, water tenders, and trucks, as well as associated supplies. According to the Fish and Wildlife Service, it was not aware that it was supposed to request about $8 million that it needs to procure about 90 pieces of firefighting equipment.

Lack of Coordination, Consistency, and Agreement Extends to How Accomplishments Are Measured and How Funds Are Accounted For

Lack of coordination, consistency, and agreement among the five federal land management agencies extends to how they plan to measure accomplishments and how they account for funds.

For instance, to ensure that the National Fire Plan accomplishes its intended goals and objectives, the federal wildland fire management policy requires federal agencies to establish and implement a clear, concise system of accountability. However, Interior has not established any quantifiable long-term or annual performance measures to gauge its progress in reducing hazardous fuels. Conversely, the Forest Service plans to measure and report on (1) the percent of wildland-urban interface areas with completed fuels treatments and (2) the percent of all acres with fuel

levels meeting "condition class 1;" that is, where human activities have not significantly altered historical fire regimes or where management activities have successfully maintained or restored ecological integrity.

Similarly, Interior and the Forest Service are using different measures to gauge their progress toward being fully prepared to fight future wildland fires. Interior measures the percent of wildland fires contained during initial attack while the Forest Service measures the amount of firefighting resources that it can make available to fight a wildland fire.

Interior and the Forest Service also do not consistently account for how they spend funds appropriated for wildland fire preparedness and suppression. Prior to fiscal year 2001, both Interior and Forest Service personnel normally assigned to managerial, administrative, and other staff positions in their wildland fire management programs charged the first 8 hours of every workday to funds allocated for firefighting preparedness, even when they were assigned to fighting wildland fires. However, beginning with fiscal year 2001, all Forest Service personnel assigned to fighting wildland fires now charge their entire time to funds allocated for firefighting suppression. Although our ongoing work has not determined which is more appropriate, the Forest Service's accounting change will reduce funds charged to preparedness and increase funds charged to suppression, in comparison with prior years and Interior's accounting for its funds allocated for similar activities. As a result, the Congress has no consistent basis for holding Interior and the Forest Service accountable.

Effective Implementation of the National Fire Plan May Require Changes to Interior's and the Forest Service's Existing Organizational Structures

According to the 2001 update, the failure to fully implement the 1995 federal wildland fire management policy resulted, in part, from the lack of an entity with the authority to provide the necessary strategic direction, leadership, coordination, conflict resolution, and oversight and evaluation to the full range of affected agencies and disciplines. Although it is early in the implementation of the National Fire Plan, it is clear that its implementation also suffers from the lack of such an entity.

The five federal land management agencies have been reluctant to change their traditional organizational structures of federal wildland fire management. Because of this reluctance, they have failed to incorporate into the National Fire Plan many of the federal wildland fire management policy's guiding principles and recommendations. As a result, the five agencies continue to plan and manage wildland fire management activities primarily on an agency-by-agency and unit-by-unit basis. Moreover, although implementing the National Fire Plan in an efficient, effective, and

timely manner will require an interdisciplinary approach, federal fire managers and managers in other disciplines within the agencies—including those responsible for wildlife and fisheries and vegetation and watershed management—have been reluctant to forge the necessary new working relationships.

From a budgetary perspective, this continuation of a narrowly focused, stovepipe approach will mean that funds appropriated for wildland fire management may not be used in an efficient, effective, and timely manner. There may be human consequences as well. For instance, the failure to allocate funds for fuels reduction to the highest-risk communities and ecosystems increases future risks not only to those communities and ecosystems, but also to firefighters charged with controlling and suppressing wildland fires.

We are continuing our review of the implementation of the National Fire Plan. However, we agree with the federal wildland fire management policy that the federal land management agencies must take action now to resolve the wildland-urban interface problem. We would encourage the administration and the Congress to consider all of the alternative organizational structures identified in the policy, including establishing a single federal wildland fire management entity with the authority to provide the necessary strategic direction, leadership, coordination, conflict resolution, and oversight and evaluation to the full range of affected agencies and disciplines.

Mr. Chairman, this concludes my formal statement. I will be pleased to respond to any questions that you or other Members of the Subcommittee may have.

Contacts and Acknowledgment

For future contacts regarding this statement, please contact Barry T. Hill on (202) 512-3841. Individuals making key contributions to this testimony were Ron Belak, Paul Bollea, Charlie Cotton, Alan Dominicci, Cliff Fowler, Ches Joy, Paul Lacey, and John Murphy.

Appendix I

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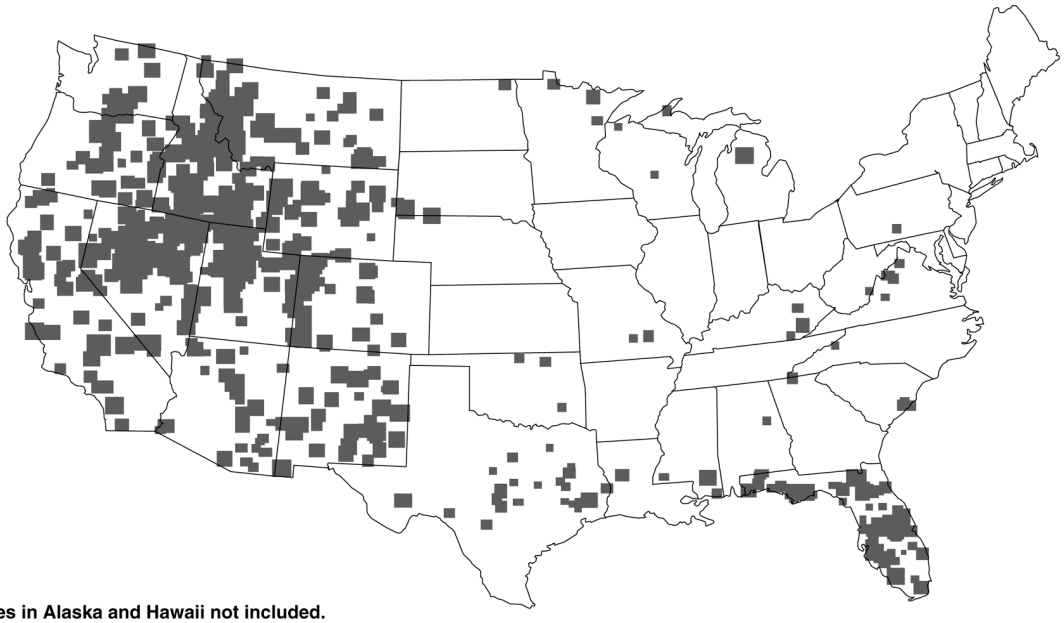
Location of Major Fire Occurrences During Summer 2000



Note: Occurrences in Alaska and Hawaii not included.
Source: Adapted by GAO from U.S. Department of the Interior Data.

Appendix II

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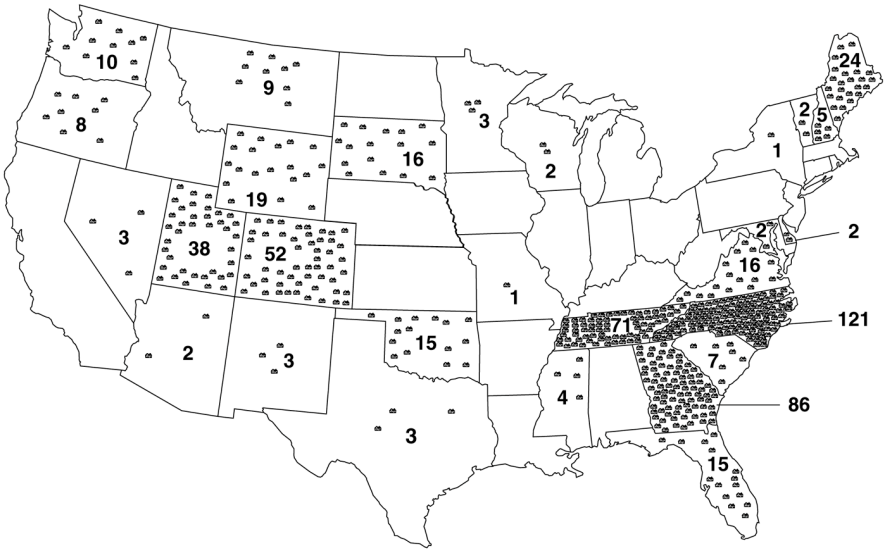
Number of Communities, by State, Identified by Interior as Being at Highest Wildfire Risk



Note: No communities identified in California and Idaho because these states did not rank communities they submitted by high, medium or low risk. Communities in Alaska and Hawaii not shown.
Source: Adapted by GAO from U.S. Department of the Interior Data.

Appendix III

Status of Fire Management Plans, as of June 30, 2001

Agency	Units that need FMP	Units with a FMP	Percent of units with a FMP	FMPs not compliant with "1995" Fire Policy	Percent of FMPs not compliant	Burnable acres	Acres for units with a FMP	Acres for noncompliant FMPs	Percent
BIA	157	72	46	84	54	54,315,537	40,151,801	15,788,451	29
BLM	60	60	100	0	0	263,584,784	263,584,784	0	0
FWS	647	361	56	320	49	73,035,766	69,499,144	5,337,459	7
FS	242	219	90	137	57	181,175,021	165,812,295	74,845,727	41
NPS	277	147	53	227	82	82,532,896	77,939,127	24,756,455	30
Total	1,383	859	62	768	55.53	654,644,004	616,987,151	120,728,092	18.44

Legend:
BIA = Bureau of Indian Affairs
BLM = Bureau of Land Management
FWS =Fish & Wildlife Service
FS = Forest Service
NPS = National Park Service

Source: GAO's analysis of data from the Forest Service and Department of the Interior.

Appendix IV

Department of the Interior and Forest Service's Status of the Preparedness Staffing, as of June 30, 2001

	Temporary positions			Permanent positions[a]			All positions		
	2001 total projected positions	2001 positions actual	%	2001 total projected positions	2001 positions actual	%	2001 total projected positions	2001 positions actual	%
Department of the Interior									
Bureau of Land Management	1,731	1,409	81.4	1,895	1,412	74.5	3,626	2,821	77.8
Bureau of Indian Affairs	782	537	68.7	1,013	994	98.1	1,795	1,531	85.3
Fish and Wildlife Service	275	108	39.3	327	258	78.9	603	366	60.7
National Park Service	244	232	95.1	410	299	72.9	654	531	81.2
Total	**3,032**	**2,286**	75.4	**3,645**	**2,963**	81.3	**6,678**	**5,249**	78.6
Forest Service	5,591	5,483	98.1	5,416	5,267	97.2	11,007	10,750	97.7

[a] Permanent positions include both permanent and career seasonal positions.

Source: Bureau of Land Management; Forest Service