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United States Government Accountability Office
Washington, DC 20548

May 1, 2006

The Honorable Charles H. Taylor
Chairman
The Honorable Norman D. Dicks
Ranking Minority Member
Subcommittee on Interior, Environment, and Related Agencies
Committee on Appropriations
House of Representatives

Subject: *Wildland Fire Management: Update on Federal Agency Efforts to Develop a Cohesive Strategy to Address Wildland Fire Threats*

The wildland fire problems facing our nation continue to grow. The number of acres burned by wildland fires annually from 2000 to 2005 was 70 percent greater than the average burned annually during the 1990s, while appropriations for the federal government's wildland fire management activities tripled from about \$1 billion in fiscal year 1999 to nearly \$3 billion in fiscal year 2005. Experts believe that catastrophic damage from wildland fire probably will continue to increase until an adequate long-term federal response, coordinated with others, is implemented and has had time to take effect.

In the past 7 years, the federal government has made important progress in putting into place basic components of a framework for managing and responding to the nation's wildland fire problems. Many challenges lie ahead, however, if the federal agencies having primary responsibility for managing wildland fire issues—the Forest Service within the Department of Agriculture and the Bureau of Indian Affairs (BIA), Bureau of Land Management (BLM), Fish and Wildlife Service (FWS), and National Park Service (NPS) within the Department of the Interior—are to address the problems in a timely and effective manner. Most notably, as we reported in January 2005,¹ the agencies need to develop a cohesive strategy that identifies the available long-term options and related funding requirements for reducing excess vegetation that could fuel wildland fires and for responding to wildland fires when they occur. The agencies and the Congress need such a strategy in order to make informed decisions about an effective and affordable long-term approach for addressing problems that have been decades in the making and will take decades more to resolve.

¹GAO, *Wildland Fire Management: Important Progress Has Been Made, but Challenges Remain to Completing a Cohesive Strategy*, [GAO-05-147](#) (Washington, D.C.: Jan. 14, 2005).

In our January 2005 report, recognizing that the development of a cohesive strategy that includes long-term options and funding was itself a long-term effort, we recommended that the Secretaries of Agriculture and the Interior provide the Congress with a joint tactical plan outlining the critical steps the agencies planned to take, together with related time frames, to complete such a cohesive strategy. In responding to that report, officials from Agriculture and Interior said they would produce an initial tactical plan by August 2005.

Our prior work also identified several tasks, each with its own challenges, that the agencies must complete prior to implementing such a strategy, including

- finishing data systems needed to identify the extent, severity, and location of wildland fire threats to the nation's communities and ecosystems;
- updating local fire management plans to better specify the actions needed to effectively address these threats; and
- assessing the cost-effectiveness and affordability of options for reducing fuels.

In this context, you asked us to provide information on (1) the progress that the Departments of Agriculture and the Interior have made over the past year in developing a tactical plan outlining the steps and time frames needed to complete a cohesive strategy for addressing wildland fire threats, as we recommended; and (2) the agencies' efforts to address the challenges GAO believes they are likely to face as they develop this cohesive strategy. To obtain this information, we reviewed agency documents regarding wildland fire management activities and interviewed federal and nonfederal officials knowledgeable about the agencies' wildland fire management efforts. We conducted our work in March and April 2006 in accordance with generally accepted government auditing standards.

Results in Brief

The agencies have not prepared a tactical plan outlining the critical steps and associated time frames for completing a cohesive wildland fire management strategy, as we recommended. And while the agencies completed a February 2006 interagency document entitled "Protecting People and Natural Resources: A Cohesive Fuels Treatment Strategy," this document does not identify long-term options and related funding needed for reducing fuels and responding to wildland fires when they occur, as we called for. Agency officials initially told us that they would not be able to produce such a strategy because the Office of Management and Budget (OMB) does not allow them to publish long-term cost estimates—thus rendering a tactical plan unnecessary. In responding to a draft of this report, the agencies commented that OMB does not believe that the agencies will be able to produce credible long-term funding estimates until two key data systems to help identify wildland fire threats and allocate fire management resources are more fully operational. OMB officials stated

that they will allow the agencies to publish such estimates, but only when the agencies have sufficiently reliable data on which to base them.

The agencies have made progress on the three primary tasks we identified as important to developing a wildland fire management strategy, although challenges remain.

- LANDFIRE, a geospatial data and modeling system, will assist the agencies in identifying the extent, severity, and location of wildland fire threats to the nation's communities and ecosystems. LANDFIRE data are nearly complete for most of the western United States, with data for the remainder of the country scheduled to be completed in 2009. The agencies will need to ensure that LANDFIRE data are kept current in order to reflect landscape-altering events such as large fires and hurricanes.
- About 95 percent of the agencies' individual land management units have completed fire management plans in accordance with agency requirements promulgated in 2001. However, the agencies do not require regular plan updates to ensure that new data (from LANDFIRE, for example) are incorporated into the plans.
- The Fire Program Analysis (FPA) system is a computer-based model designed to assist the agencies in cost-effectively allocating the resources necessary to address wildland fires. The first of FPA's two phases is nearly complete, with the second phase expected to be completed in 2008. However, gaps in the data collected for FPA may reduce its usefulness in allocating resources.

Given the importance of a cohesive strategy for wildland fire management that includes long-term options and associated funding requirements, and the need to understand how and when the agencies will produce such a strategy, the Congress may want to consider requiring the Secretaries of Agriculture and the Interior to develop a tactical plan outlining the key steps and time frames required to complete this cohesive strategy. Further, if the Congress believes it will need information on options and related funding before 2009—the scheduled completion date for LANDFIRE, which the agencies say they will need in order to produce credible funding estimates—it may wish to look to an independent source to provide interim information, perhaps by requiring the secretaries to contract with a third party to do so.

In responding to a draft of this report, the Forest Service and the Department of the Interior generally agreed with our findings, and with the need for a cohesive strategy and an associated tactical plan. However, given the agencies' additional comments about OMB's specific objections to their publishing long-term funding estimates critical to a cohesive strategy, and OMB's confirmation that it will allow the agencies to produce such estimates provided they have sufficiently reliable data on which to base the estimates, we revised the matters for congressional consideration contained

in our draft report. See the Agency Comments and Our Evaluation section, as well as enclosures I and II, for the agencies' comments and our responses.

Background

Wildland fire triggered by lightning is a normal, inevitable, and necessary ecological process that periodically removes excess undergrowth, small trees, and vegetation to renew ecosystem productivity. However, various human land use and management practices, including several decades of fire suppression activities, have reduced the normal frequency of wildland fires in many forest and rangeland ecosystems and have resulted in abnormally dense and continuous accumulations of vegetation that can fuel uncharacteristically large and intense wildland fires. Such large intense fires increasingly threaten catastrophic ecosystem damage and also increasingly threaten human lives, health, property, and infrastructure in the wildland-urban interface. Federal researchers estimate that vegetative conditions that can fuel such fires exist on 90 million to 200 million acres of federal lands in the contiguous United States, and that these conditions also exist on many nonfederal lands.

Our reviews over the last 7 years identified several weaknesses in the federal government's management response to wildland fire issues, including

- the lack of a national strategy that addressed the likely high costs of needed fuel reduction efforts and the need to prioritize these efforts;
- shortcomings in federal planning and implementation at the local level;
- the lack of basic data, such as the amount and location of lands needing fuel reduction;
- ineffective coordination among federal agencies and collaboration between these agencies and nonfederal entities; and
- insufficient accountability for federal expenditures and performance in wildland fire management.

Because of these weaknesses, and because of the likelihood that wildland fire problems will take decades to resolve, we concluded that the agencies needed a cohesive, long-term federal wildland fire management strategy focusing on identifying options for reducing fuels over the long term in order to decrease future wildland fire risks. We also said that the strategy should identify the needed funding associated with those different fuel reduction options over time, so that the agencies and the Congress could make cost-effective, strategic funding decisions.

The agencies have several wildland fire management activities under way that will be important to the development of a long-term cohesive strategy. In 2003, Agriculture and Interior approved funding for development of a geospatial data and modeling

system, called LANDFIRE, designed to generate comprehensive maps of vegetation, fire, and fuel characteristics nationally and to enable comparisons of conditions between different field locations nationwide. When operational, LANDFIRE data and enhanced models of likely fire behavior thus will help identify the nature and magnitude of the wildland fire risks confronting numerous community and ecosystem resources, such as residential and commercial structures, species habitat, air and water quality, and soils. The agencies plan to use this information to better support their strategic decisions on preparedness, suppression, the location and design of fuel reduction projects, and other land management activities.

Another element of the agencies' wildland fire management strategy is the preparation of fire management plans, which are local plans prepared by individual agency management units (such as wildlife refuges or national forests) to define each unit's program to prepare for and manage fires. Fire management plans are important for identifying the fuel reduction, preparedness, suppression, and rehabilitation actions needed at the local level to effectively address wildland fire threats.

Finally, the agencies are implementing FPA, an interagency system intended to provide a single mechanism for planning and budgeting agency activities to prepare for, and respond to, wildland fire.² FPA, which will use LANDFIRE data when available, is designed to identify the most cost-effective allocations of annual preparedness funding for implementing agency field units' local fire management plans, taking into account fire risk, resources to be protected, available firefighting assets, and other information.

Neither a Tactical Plan Nor a Cohesive Wildland Fire Strategy That Includes Long-Term Options and Needed Funding Have Been Completed

Officials at Agriculture and Interior told us the agencies have not developed the tactical plan we called for, outlining the critical steps the agencies will take, together with related time frames, to complete a cohesive strategy for wildland fire management—despite their commitment to do so in their response to our January 2005 report. And while the agencies completed a February 2006 interagency document entitled “Protecting People and Natural Resources: A Cohesive Fuels Treatment Strategy,” this document does not identify long-term options and related funding needed for reducing fuels and responding to wildland fires when they occur.

Agency officials initially told us that they would be unable to ever produce such a strategy because OMB will not allow them to publish long-term cost estimates—making a tactical plan unnecessary. In responding to a draft of this report, the agencies commented that OMB does not believe the agencies can produce credible

²FPA is being implemented in response to a congressional committee direction to improve budget allocation tools. See GAO, *Wildland Fire Management: Improved Planning Will Help Agencies Better Identify Fire-Fighting Preparedness Needs*, [GAO-02-158](#) (Washington, D.C.: Mar. 29, 2002).

long-term funding estimates until LANDFIRE and FPA are more fully operational. OMB officials stated that they will allow the agencies to publish long-term cost estimates, but only when they have sufficiently reliable data to develop credible estimates, and that LANDFIRE and FPA will be critical to doing so. Given OMB's concerns, it appears unlikely that a cohesive strategy that includes long-term options and needed funding will be developed before 2009, the scheduled completion date for LANDFIRE.

Agency officials told us that, although their recently published cohesive strategy does not contain long-term options and needed funding, the agencies are taking steps to increase the effectiveness of their wildland fire management. The Wildland Fire Leadership Council is developing a comprehensive framework to monitor hazardous fuels reduction projects,³ and is conducting a review of the 10-Year Comprehensive Strategy Implementation Plan.⁴ The comprehensive monitoring framework will, among other activities, evaluate the effect of fuels treatments intended to reduce the risk of wildland fire and the extent of collaboration among federal, state, and local entities. Similarly, the review of the implementation plan, which an Interior official told us will be completed by midsummer 2006, will incorporate performance measures to evaluate whether fuels treatment activities are meeting their intended objectives. However, both of these efforts focus on the effects of fuels treatment activities, rather than providing options and needed funding for potential future wildland fire management activities.

Progress Has Been Made on LANDFIRE, Fire Management Plans, and FPA, but Challenges Remain

The agencies have made progress in implementing three ongoing efforts that are critical to developing and implementing a cohesive wildland fire management strategy: LANDFIRE, fire management plans, and FPA. However, given the evolving nature of these efforts—particularly LANDFIRE and FPA—it will be important for the agencies to remain vigilant in ensuring that these efforts incorporate up-to-date and comprehensive data, in order to deliver on their promise.

LANDFIRE

According to agency officials, LANDFIRE data have been collected for most of the western United States and are currently being validated, a process that should be completed by the end of fiscal year 2006. Data validation includes an internal data

³The Wildland Fire Leadership Council was established in April 2002 to support the implementation and coordination of federal wildland fire management activities. The council includes membership from Agriculture and Interior as well as the agencies with wildland fire management responsibilities.

⁴The 10-Year Comprehensive Strategy, published in 2001 by the Departments of Agriculture and the Interior and the Western Governors Association, and the associated implementation plan detail goals, timelines, and responsibilities for various actions related to wildland fire management.

quality assurance and quality control process, according to these officials, as well as extensive work with local agency fire managers to ensure that the information produced by LANDFIRE accurately represents on-the-ground conditions. Data for the remaining contiguous states are scheduled to be completed by the end of fiscal year 2008, and for Alaska and Hawaii by the end of fiscal year 2009. In May 2006, LANDFIRE’s Executive Oversight Committee, an interagency group of managers responsible for overseeing the project, will be conducting a review to evaluate the project’s objectives, schedule, budget, data development, and data use.

As of March 2006, according to agency officials, almost \$18 million of LANDFIRE’s total expected cost of about \$39 million has been spent. However, these officials also told us that, as of the same date, LANDFIRE was about 6 months behind the original production schedule, and agencies still face challenges regarding completion and implementation. The primary challenge facing LANDFIRE, according to agency officials, is keeping the data current in the face of landscape-altering events such as hurricanes and fires. Without up-to-date data, agency managers will have difficulty using LANDFIRE to identify existing vegetation and other landscape characteristics—information that is essential to developing an appropriate wildland fire management strategy. And while it is possible to acquire new data for particular areas that have undergone change, according to agency officials, integrating new data into the existing LANDFIRE data set can be problematic.

Fire Management Plans

Nearly all of the agencies’ land management units have completed fire management plans as called for in 2001 federal wildland fire management policy, according to agency officials and documents. Many, though not all, of these plans have been prepared within a common interagency template, which the agencies adopted to ensure greater consistency in their contents. Table 1 below shows the status of each agency’s fire management plans.

Table 1: Completion Status of Agency Fire Management Plans Compliant with 2001 Federal Wildland Fire Management Policy

Agency	Number of plans needed	Number of plans completed	Percentage of needed plans completed	Percentage of plans using template
Forest Service	115	115	100	100
Bureau of Indian Affairs	353	350	99	^a
Bureau of Land Management	72	72	100	100
Fish and Wildlife Service	641	617	96	^a
National Park Service	279	238	85	100
Total	1,460	1,392	95	^a

Source: GAO analysis of agency data.

^aBIA and FWS officials told us that a portion of their agencies’ plans use the template, although they did not estimate the percentage of completed plans doing so.

If these plans are to be the principal managing instruments for identifying, budgeting for, and implementing the various actions needed at the local level to effectively address wildland fire threats, the agencies will need to ensure that the plans are kept current. This will involve updating the plans to incorporate available LANDFIRE data as well as available research on addressing wildland fire threats (such as research on the extent to which conducting fuel reduction treatments in certain geometric patterns improves the treatments' effectiveness in reducing the spread rate and intensity of wildland fires). However, agency guidance does not require regular plan updates, instead leaving it up to land management units to determine the frequency of needed updates. January 2006 guidance covering the Forest Service, BLM, FWS, and NPS calls for these agencies to review plans annually and update them as needed; similarly, a BIA official told us that BIA guidance calls for plans to be updated when "significant changes" occur, such as large fires or changes in a particular unit's land use plan. Further, the agencies may not always find it easy to update these plans; a Forest Service official told us that, if the introduction of new data into a fire management plan results in the development of new fire management objectives, the agency might need to conduct a new National Environmental Policy Act analysis for that plan,⁵ requiring additional time and resources. If fire management plans are not updated to reflect the most current information on the extent and distribution of fire risks and the most promising methods for dealing with them, the plans will be of limited use in the agencies' attempts to manage wildland fire problems.

FPA

FPA is being implemented in two phases, the first of which is nearly complete. Phase I is intended to provide information for use in two primary areas: (1) allocating resources for the initial responses to fires and (2) developing estimates for the agencies' fiscal year 2008 budgets. Agency officials told us that, of the 138 interagency "fire planning units" established to submit data for FPA, 134 have submitted Phase I data. The agencies will validate the data during the spring and summer of 2006, and expect to use the data in formulating their fiscal year 2008 budgets. Phase II focuses on additional activities, including fuel reduction, postfire rehabilitation, and others; data for this phase are expected to be submitted by June 2008, followed by agency analysis and validation of the data.

Agency officials told us that, as part of FPA's implementation, about 600 staff within the agencies, including staff in each of the 138 fire planning units, have received training on FPA. Agency officials also are conducting a "midcourse review" of FPA to assess progress to date and determine what changes may be necessary as the agencies continue to implement FPA. Officials told us that they expect a final report on the results of the review in the spring or summer of 2006. According to agency

⁵For major federal actions that significantly affect the quality of the human environment, the National Environmental Policy Act requires all federal agencies to analyze the environmental impact of the proposed action. 42 U.S.C. § 4332(2)(C).

officials, as of March 2006, about \$21 million of the expected overall cost of \$48 million had been spent on FPA. This is about \$6 million more than the 2004 estimate of \$42 million; a Forest Service official told us that the increase is primarily due to an additional year of Phase II development, as well as additional operations and maintenance costs expected in 2009 and 2010.

While progress continues to be made, gaps exist in the data collected for FPA. In order to cost-effectively allocate federal resources, FPA was designed to incorporate data on both federal and nonfederal firefighting assets (such as personnel and equipment) because both federal and nonfederal assets might be used to fight an individual fire, regardless of whether the fire occurs on federal or nonfederal land. Nevertheless, nonfederal assets have not been consistently included in FPA because, according to officials and FPA documents, many states and other nonfederal entities have been reluctant or unwilling to provide data for FPA. Some states are concerned about the time and resources required to compile and submit data for FPA, particularly given that many states do not envision using FPA to develop their wildland fire budgets and thus cannot justify the additional workload required to participate. In other cases, nonfederal officials may be worried that federal assets will be reduced in areas where nonfederal assets already exist because the nonfederal assets may be deemed sufficient to provide the initial response to a fire—which could potentially increase the nonfederal entities' workload in the event of a fire.

Without comprehensive data on all federal and nonfederal assets available to fight wildland fires, it is unclear how effectively federal resources will be allocated using FPA because federal resources may be directed to areas where sufficient nonfederal assets already exist—or, conversely, federal resources may be directed away from areas despite those areas' lack of available nonfederal assets. However, federal agency officials stated that the absence of nonfederal data is unlikely to significantly hamper the agencies' ability to use FPA to make resource allocation and budget decisions, although they have not yet fully assessed the effect of not having complete nonfederal data. These officials also reported that they are developing a strategy for obtaining nonfederal data.

Conclusions

The federal government is expending substantial effort and billions of dollars in attempting to address our nation's wildland fire problems. If the agencies and the Congress are to make informed decisions about an effective and affordable long-term approach to the issue, they should have a cohesive strategy that identifies long-term options and needed funding for addressing these wildland fire problems. Because it likely will be at least 2009 before the agencies develop such a strategy that would meet standards required by OMB, we continue to believe it is essential that, in the interim, the agencies create a tactical plan for developing this strategy, so that the Congress understands the steps and time frames involved with its completion. However, despite our previous recommendation that the agencies develop this

tactical plan, and the agencies' commitment to do so, they have not produced such a plan.

Matters for Congressional Consideration

Given the importance of a cohesive strategy for wildland fire management that identifies long-term options and needed funding, as well as the need to understand how and when the agencies will develop such a strategy, the Congress may wish to consider requiring that the Secretaries of Agriculture and the Interior develop a tactical plan that lays out the specific steps and time frames needed to complete a cohesive strategy.

In the interim, while the agencies are developing a tactical plan and cohesive strategy, the Congress will continue to lack information regarding long-term options and needed funding for responding to wildland fire problems. If the Congress believes such information is necessary to make informed decisions in the near term, it may wish to consider seeking an independent source to provide interim information until the agencies are able to complete the cohesive strategy we previously recommended. This could be accomplished by, among other approaches, requiring the Secretaries of Agriculture and the Interior to contract with a third party. Regardless of the approach chosen, given both the complexity and the urgency of the wildland fire issue, the Congress may wish to specify certain time frames and deliverables—including long-term options and needed funding based upon the best available information—in order to ensure that it is provided with timely and comprehensive information.

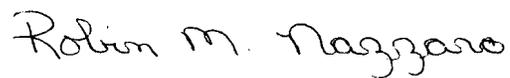
Agency Comments and Our Evaluation

We provided a draft of this report to the Secretaries of Agriculture and the Interior for review and comment. The agencies generally agreed with our findings, and with the need for a cohesive strategy and an associated tactical plan. They provided additional comments that we have incorporated into the report, as appropriate. Their comments, along with our responses, are reprinted in enclosures I and II, respectively.

Our draft report contained a matter for congressional consideration suggesting that the Congress require the agencies to develop a cohesive strategy including long-term options and needed funding, given the agencies' initial statements that OMB would not permit them to produce long-term cost estimates. In responding to a draft of our report, the agencies provided additional comments about OMB's specific objections to their publishing long-term funding estimates critical to a cohesive strategy. OMB confirmed that it will allow the agencies to produce such estimates provided they have sufficiently reliable data on which to base them. Accordingly, we revised the matters for congressional consideration.

We are sending copies of this report to the Secretaries of Agriculture and the Interior and the Chief of the Forest Service. We will also make copies available to others upon request. In addition, this report will be available at no charge on GAO's Web site at <http://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-3841 or at nazzaror@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. Major contributors to this report were David P. Bixler, Assistant Director; Steve Gaty; Richard Johnson; Chester Joy; and Matthew Reinhart.

A handwritten signature in black ink that reads "Robin M. Nazzaro". The signature is written in a cursive, slightly slanted style.

Robin M. Nazzaro
Director, Natural Resources and Environment

Enclosures

Enclosure I

Comments from the Forest Service



United States
Department of
Agriculture

Forest
Service

Washington
Office

1400 Independence Avenue, SW
Washington, DC 20250

File Code: 1420/1310/1930

Date: APR 21 2006

Ms. Robin Nazzaro
Director, Natural Resources and Environment
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

Dear Ms. Nazzaro:

Thank you for the opportunity to review and comment on the draft Government Accountability Office (GAO) correspondence, GAO-06-671R, "Wildland Fire Management: Update on Federal Agency Efforts to Develop a Cohesive Strategy to Address Wildland Fire Threats." The Forest Service generally agrees with the findings in the correspondence and believes that GAO accurately portrayed the progress the agency has made in implementing LANDFIRE and FPA.

There is a point that the Forest Service would like to see clarified:

- Under the "Results in Brief" and the "Neither a Tactical Plan nor a Cohesive Wildland Fire Strategy That Includes Long-Term Options and Needed Funding Have been Completed" sections, GAO states department officials said they cannot produce such a strategy because OMB will not allow them to publish long-term cost estimates. While this is factually correct, it needs to be put in the proper context. OMB does not believe that the agency can produce credible long-term funding estimates until LANDFIRE and FPA are more fully operational and are concerned about the Administration providing numbers to Congress that are unreliable.

The correspondence contains a Matter for Congressional Consideration that tells Congress they may wish to consider requiring the Secretaries of Agriculture and Interior to produce a cohesive strategy that includes long-term options and the needed funding associated with each option and, as an interim step, to produce a tactical plan laying out the steps and timeframes required to produce a cohesive strategy. As the Forest stated in its response to the original report "Wildland Fire Management: Important Progress Has Been Made, but Challenges Remain to Completing a Cohesive Strategy", in January 2005 the agency generally agrees with the premise of the idea but believes accurate and credible numbers in any cohesive strategy will require LANDFIRE and FPA becoming more fully operational. However, at this time, it may be possible to produce a tactical plan that lays out steps and timeframes for completing LANDFIRE and FPA, as well as other current efforts.



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See comment 1.

See comment 2.

Ms. Robin Nazzaro

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Again, we thank GAO for the opportunity to comment on this correspondence. If you have any questions, please contact Sandy Cantler, Fire and Aviation Management, at (202) 205-1438 or Sandy Coleman, Assistant Director, Agency Audit Liaison Staff, at (703) 605-4940.

Sincerely,

A handwritten signature in black ink, appearing to read "Dale N. Bosworth". The signature is written in a cursive style with a large initial "D".

DALE N. BOSWORTH
Chief

cc: Sandra Cantler, Jesse L King, Sandy T Coleman, Clarice Wesley

The following are GAO's comments on the Forest Service's letter dated April 21, 2006.

GAO Comments

1. We have modified our draft to include the agency's statement that OMB does not believe that the departments can produce credible long-term funding estimates until LANDFIRE and FPA are more fully operational.
2. We have modified our matters for congressional consideration based on statements from the agencies and OMB regarding the agencies' ability to produce a cohesive strategy.

Enclosure II

Comments from the Department of the Interior



United States Department of the Interior

OFFICE OF THE SECRETARY
Washington, D.C. 20240

APR 21 2006

Ms. Robin Nazzaro
Director, Natural Resources and Environment
U.S. Government Accountability Office
441 G Street, N.W.
Washington, DC 20548

Dear Ms. Nazzaro:

Thank you for the opportunity to review and comment on the draft Government Accountability Office (GAO) correspondence, GAO-06-671R, "Wildland Fire Management: Update on Federal Agency Efforts to Develop a Cohesive Strategy to Address Wildland Fire Threats." The Department of the Interior generally agrees with the findings in the correspondence and believes that GAO accurately portrayed the progress the Department has made on the three primary activities GAO considers necessary to preparation of a long-term cohesive strategy: LANDFIRE, fire management plans, and the Fire Program Analysis (FPA) tool.

The Department is concerned, however, that by restating conclusions from previous studies in the Background section without acknowledging that progress has been made in addressing the concerns they portray, the reader may draw an incorrect inference regarding progress. For example, contrary to the page five bullet point "ineffective coordination among federal agencies and collaboration between these agencies and nonfederal entities," DOI bureaus actively engage in collaborative project identification and prioritization efforts with state, tribal, and local partners throughout the country including development of Community Wildfire Protection Plans.

The Department would like to clarify a point regarding preparation of the kind of cohesive strategy called for by GAO:

- Under the "Results in Brief" and the "Neither a Tactical Plan nor a Cohesive Wildland Fire Strategy That Includes Long-Term Options and Needed Funding Have been Completed" sections, GAO states department officials said they cannot produce such a strategy because OMB will not allow them to publish long-term cost estimates. While this is factually correct, it needs to be put in the proper context. OMB does not believe that the agencies can produce credible long-term funding estimates until LANDFIRE and FPA are more fully operational and are concerned about the Administration providing numbers to Congress that may be unreliable. We strongly urge GAO to correct its statement.

See comment 1.

See comment 2.

See comment 3.

The correspondence contains a Matter for Congressional Consideration that tells Congress they may wish to consider requiring the Secretaries of Agriculture and Interior to produce a cohesive strategy that includes long-term options and the needed funding associated with each option and, as an interim step, to produce a tactical plan laying out the steps and timeframes required to produce a cohesive strategy. As the Department noted in its December 10, 2004 response to the original report "Wildland Fire Management: Important Progress Has Been Made, but Challenges Remain to Completing a Cohesive Strategy," the agency generally agrees with the premise of the idea but believes accurate and credible numbers in any cohesive strategy will require LANDFIRE and FPA becoming more fully operational. However, at this time, it may be possible to produce a tactical plan that lays out steps and timeframes for completing LANDFIRE and FPA, as well as other current efforts.

Again, we thank GAO for the opportunity to comment on this correspondence.

Sincerely,



R. Thomas Weimer
Assistant Secretary
Policy, Management and Budget

The following are GAO's comments on the Department of the Interior's letter dated April 21, 2006.

GAO Comments

1. In identifying the weaknesses that we found in our previous work, we do not intend to imply that the agencies have made no progress in addressing these issues. Instead, we are simply providing context for our ongoing efforts to assess the agencies' wildland fire management activities.
2. We have modified our draft to include the department's statement that OMB does not believe that the agencies can produce credible long-term funding estimates until LANDFIRE and FPA are more fully operational.
3. We have modified our matters for congressional consideration based on statements from the agencies and OMB regarding the agencies' ability to produce a cohesive strategy.

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