

# EMPSI INSIGHTS:

## The Benefits of Regional Joint-Agency Wildfire Planning and NEPA

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### ABSTRACT

As trends continue with larger and more catastrophic wildfires, there is an immediate need to reevaluate how agencies and organizations plan and mitigate for wildfire risk in the United States. There are several institutional and regulatory constraints that have driven wildfire management to be reactionary, site-specific, and confined to administrative boundaries. From high fuel loads to climate change, the conditions of wildlands require a paradigm shift to landscape-level planning, multi-jurisdictional coordination, and comprehensive regulatory compliance. There are a number of proven strategies to achieve this, including: (1) using assessment tools to identify constraints and project opportunities at a regional scale; (2) preparing programmatic wildfire management plans to provide regulatory compliance over a large area, thereby reducing the need for site-specific analysis and allowing for faster, more coordinated, and broader-scale implementation; and (3) incorporating more specific regional fire management into federal land management plans.

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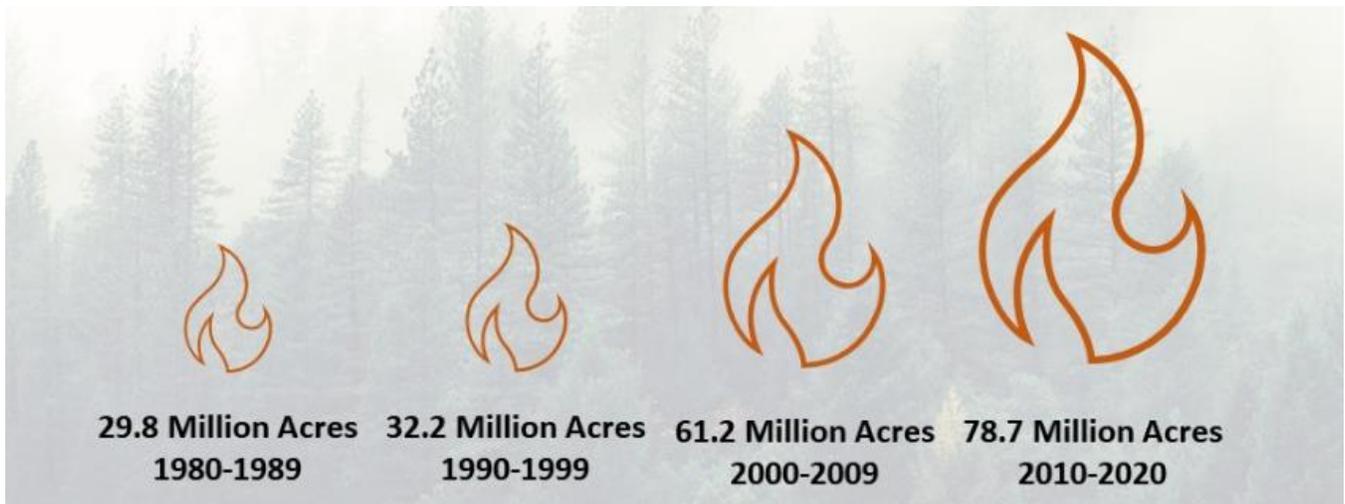
### Introduction

There is an immediate need for landscape-level planning and multi-jurisdictional coordination to address wildfire risk in the United States. Nationwide, over 49.3 million acres burned between 2015 and 2020. The years 2015, 2017, and 2020 each experienced fire seasons with more than 10 million acres burned. Since 1983, when the National Interagency Fire Center implemented a standard system for recording annual acres burned, the ten largest fire seasons occurred after 2004. During this time, the average wildfire size as well as the acres burned by decade (Figure 1) have nearly doubled (NIFC 2021).

Some factors contributing to larger, higher-intensity fires include increased fuel loading caused in part by previous fire suppression policies, changes in temperature and precipitation patterns that have led to increased periods of drought, and invasive weeds that have contributed to deviations from historic fire regimes.

Firefighter safety and limiting the exposure of agency personnel to unnecessary risks during suppression activities will continue to be every agency's top priority. During fire events, fire management decisions to protect firefighter safety will avoid or delay some suppression efforts that could slow fire spread and limit burned areas. Landscape-scale solutions such as a regional system of fuel breaks and a regional approach to reducing fuel loading is critical so that fire personnel have anchor points from which to establish safe suppression operations.

Additionally, managing fire at the landscape scale is more common than a few decades ago. Landscape-scale management allows land management agencies to realize the beneficial effects of fire, but also contributes to more burned acres per year. Again, a system of well-maintained fuel breaks and strategic fuel treatments allows agencies to effectively compartmentalize fire suppression. Agencies may allow a fire to burn in some areas while focusing suppression efforts in areas deemed more critical



**Figure 1. Acres Burned by Decade in the United States 1980-2020 (NIFC 2021)**

because of human safety concerns, wildlife habitat, or other priority factors. However, prioritizing protecting critical areas and allowing others to simply burn may result in greater overall burned acres.

Larger-scale, unplanned, and high-intensity fires have far-reaching effects on ecological health and the public who live, work, and recreate on public lands and in the wildland-urban interface. Public health and safety concerns include the immediate threats to lives and structures as well as those from degraded air quality.

Wildfire management planning faces several regulatory (e.g., National Environmental Policy Act [NEPA] compliance) and institutional challenges that slow project implementation and effectiveness, including:

- Agencies relying on wildfire suppression, which is a costly and reactive approach to wildfire management, rather than proactively reducing the risk of fire through fuels reduction, landscape restoration, and other holistic efforts designed to influence fire regimes at the landscape scale
- Agencies planning for and implementing fuels management on a project-by-project basis, rather than at a regional or landscape scale
- Agencies working independently and confined by administrative boundaries and agency-specific constraints and sideboards, rather

than collaboratively and across jurisdictional boundaries

The Bureau of Land Management (BLM), Forest Service, and other land management agencies are on the frontlines of wildfire and fuels management. Agencies can implement three proven strategies to equip managers with critical data and a cross-jurisdictional approach to fire and fuels management. Successfully incorporating these strategies is a critical step toward reducing the risks of large-scale, high-intensity wildfires.

**Strategy #1: Use landscape-level planning to identify constraints and opportunities at a regional scale rather than at local scales for individual projects**

While agencies have undertaken a number of actions to curtail wildfire threats, management responses must match the regional scale of the problem regardless of land ownership. Coordinated approaches to focus appropriate management actions are needed to maximize effective wildfire management planning. This strategy requires careful and considered pre-planning to identify a meaningful geographic area over which similar issues can be grouped. Effective implementation requires that agencies be transparent about their specific regulatory constraints and sideboards. Agency-specific regulations and management priorities can complicate cross-jurisdictional planning. Finally, it is important to

incorporate input from a variety of stakeholders with unique knowledge of the landscape and issues. This ensures that the breadth of management opportunities are captured during the effort. An example of this can be seen with the National Cohesive Wildland Fire Management Strategy, which establishes a national vision for wildland fire management, defines three national goals, describes the wildland fire challenges, identifies opportunities to reduce wildfire risks, and establishes national priorities focused on achieving the national goals. It is a strategic, interagency plan developed by the Department of the Interior and Department of Agriculture to work collaboratively among all stakeholders (private, state, and federal) and across all landscapes. The strategy comprehensively addresses wildland fire management and uses best science to make meaningful progress toward these national goals:

- Resilient landscapes
- Fire-adapted communities
- Safe and effective wildfire response

Additionally, in 2014 Congress passed the Good Neighbor Authority, which allows for the national implementation of cooperative landscape treatments across State and Federal lands. This legislation also provides for utilization of State land management policies on included Federal lands which can lead to streamlined planning, implementation, and revenue accountability when timber receipts are involved.

Another example is the [Fire and Invasives Assessment Tool](#) (FIAT), which incorporates best available science, regional findings, and local data to identify potential project areas and management opportunities to address the threats of wildfire, invasive annual grasses, and conifer expansion in the Great Basin region of the western United States. The FIAT incorporated input from the BLM, Forest Service, US Fish and Wildlife Service, state wildlife agencies, The Nature Conservancy, and Natural Resources Conservation Service (NRCS). FIAT stakeholders evaluated project opportunities at a landscape scale across multiple jurisdictions. EMPSi assisted in preparing FIAT Assessments for five large

subregions that identified priority areas for fuel breaks, fire operations, habitat restoration and recovery, and post-fire rehabilitation. Using the FIAT, land managers throughout portions of Idaho, Oregon, California, Nevada, and Utah are able to identify climate adaptation and resilience opportunities and prioritize project implementation annually on a regional basis.

Accomplishing landscape-level planning and NEPA compliance is a critical step toward implementing coordinated treatments at a meaningful scale.

#### Landscape-Level Planning Checklist

- ✓ *Identify the need—what issues need to be addressed and over what geographic area?*
- ✓ *Determine who should be involved—what agencies, organizations, landowners, and other stakeholders are vested in the outcome?*
- ✓ *Compile data—ensure the team has ample geographic information systems (GIS) support.*
- ✓ *Communicate—involve project managers who ensure the lines of communication stay open and clear.*

#### **Strategy #2: Prepare programmatic NEPA analyses for forest health, fire, and fuels management**

Programmatic NEPA provides broad-scale analysis of effects, allowing agencies to tier to the programmatic NEPA document for site-specific projects. A programmatic NEPA document can allow federal land management agencies to use a Determination of NEPA Adequacy (DNA) if impacts from the proposed project fall within those analyzed in the programmatic NEPA document. In this way, a programmatic, regional approach for NEPA can successfully streamline on-the-ground fuels management project implementation.

As is true for all NEPA, the success of programmatic NEPA depends on a clear description of the purpose and need, which then defines the range of alternatives analyzed. The geographic scope of the analysis is equally important, and should be scientifically-based rather than arbitrarily aligned with administrative boundaries. To expedite future NEPA compliance,

conduct a thorough analysis whereby fuels treatments and design features are paired with conditions on the ground in order to reduce impacts while still meeting project objectives.

The BLM and EMPSi completed two programmatic environmental impact statements (PEISs), one for [fuel breaks](#) and one for [fuels reduction and rangeland restoration](#) in the Great Basin. These PEISs analyzed potential treatment tools and treatment areas where fuel breaks could be constructed, and where fuels reduction and restoration projects could be implemented on public lands within portions of six states. If some aspects of a proposed project are different from those analyzed in the PEISs, the BLM can complete a site-specific, streamlined environmental assessment (EA) that tiers to one or both of the PEISs. Records of decision for both PEISs were signed in the past year, and the BLM interdisciplinary team that developed the PEISs has been conducting trainings for BLM field office staff to walk through the step-down approach to implementation.

The PEISs incorporated input from local governments, state wildlife agencies, NRCS, other federal agencies, and Native American Tribes to increase buy-in from stakeholders. A similar effort could benefit the Pacific Northwest or Rocky Mountain regions. Programmatic NEPA could also address other regional issues, such as insects and disease infestations, that contribute to wildfire activity.

#### Programmatic NEPA Checklist

- ✓ *Define the purpose and need—define the scope of the analysis and bound the range of alternatives.*
- ✓ *Delineate the project area—use a science-based approach to define the area using such factors as ecoregions or the historical extent of vegetation.*
- ✓ *Invite participation—cooperating agencies can provide valuable input to help develop alternatives or impacts analysis.*
- ✓ *Expedite implementation—conditions-based NEPA can help facilitate the use of a DNA and minimize the need for additional site-specific NEPA analysis.*

#### **Strategy #3: Incorporate regional fire management planning into land management plans**

Land management planning presents an opportunity to incorporate policy-level, regional-scale wildfire and fuels management that goes beyond suppression efforts. By incorporating this guidance and best available science, managers can be assured that they will not be constrained by limits imposed by land management plans when implementing projects. Plan-level guidance supports wildfire management by recognizing constraints, acknowledging the ecological role of fire, aligning procedures with policy, and managing risk to the extent possible. Further, land management plans consider and integrate the influence of other factors, such as the wildland-urban interface and recreation pressures, that can influence or constrain fire management. For example, the Forest Service's 2012 Planning Rule requires forest plans to include plan components that provide for ecological integrity, considering natural disturbance processes such as wildland fire and opportunities to restore fire-adapted ecosystems.

EMPSi is currently working with several national forests to incorporate such plan-level guidance into Forest Plans. Through these efforts, the Forest Service can bound the expected range of annual vegetation treatments, acknowledge management of unplanned ignitions, and plan for protection of high-value resources. Incorporating wildfire management strategies that support and are underpinned by other planning policies is critical for land managers seeking to implement projects designed to reduce wildfire impacts.

#### Planning Integration Checklist

- ✓ *Identify the issues—for many land use plans, especially in the West, wildfire is at the top of the list of issues.*
- ✓ *Compile the latest scientific data, agency expertise, and public input—a plan rooted in science with broad stakeholder support will be easier to implement and more effective at reducing wildfire impacts.*

- ✓ *Consider the interrelationships of resources and wildfire—effective land use plan policies are those that account for the influence of multiple factors, including wildfire.*

## **Conclusion**

For a variety of reasons, there is a striking trend, particularly in the West, toward larger, more ecologically and economically damaging wildfires. Federal land management agencies are on the front lines when it comes to managing fire and fuels. Implementing a multi-jurisdictional, collaborative, and data-driven regional planning strategy equips land management agencies with critical data and a cross-jurisdictional approach to fire and fuels management. Effectively communicating individual agency objectives

during the planning process can also address the challenge of creating a plan that aligns with unique agency missions. Taking a programmatic approach to NEPA reduces regulatory compliance hurdles, leading to faster, more efficient project implementation. This programmatic approach to planning allows agencies to implement treatments faster and at a meaningful scale. Integrating wildfire data and management considerations at the land use planning level provides overarching policy guidance for addressing wildfire across multiple program areas. Successfully incorporating these strategies may shift the paradigm toward a future where land management restores wildfire as a healthy, sustainable aspect of the landscape.

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## **Citations**

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