



May 8, 2025

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This letter was sent to the following –

*Senators - Mike Lee, Martin Heinrich, Steve Daines, John Boozman,
Amy Klobuchar, Susan Collins, Patty Murray*

*Representatives - Bruce Westerman, Jared Huffman, GT Thompson,
Angie Craig, Tom Cole, Rosa DeLauro*

We are writing regarding proposals to create a single wildland firefighting agency by consolidating all federal firefighting operations within the Department of the Interior, or the Department of Homeland Security. We do not believe such an organizational change would contribute to addressing the problem of catastrophic wildfire, nor would it make communities safer.

In the short term, it would likely cost billions of dollars and take many years to set up, creating chaos and greater risk. It focuses more on fire suppression than the badly needed prevention measures. It could actually increase the likelihood of more large catastrophic fires, putting more communities, firefighters and resources at risk. The proposed organizational change would not have prevented last winter's Los Angeles area fire catastrophe.

The current Forest Service fire organization is the cumulation of decades of evolved design and development, which has produced a world-class incident command system that functions very effectively. What the public really needs is for the Administration and Congress to **address the conditions that fuel these large fires.**

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The *Fix our Forests Act* is a reasonable step in this direction. While consolidating agencies might appear to be more efficient for “fixing” the catastrophic wildfire problem, successful wildland fire management involves much more than just suppression. The critical linkage between fire suppression and forest management, including fuels reduction and prescribed fire, must be maintained.

The single agency suppression proposal overlooks the critical role of many thousands of Forest Service employees who assist in firefighting efforts but are not primarily firefighters. The Administration has fired many of these employees or encouraged and accepted their resignations. Others are being targeted in future reduction in force.

The proposal also doesn’t acknowledge the effectiveness of existing interagency and state coordination through the National Wildfire Coordinating Group, the National Interagency Fire Center, and other efforts. An additional consideration is the complexity, cost and time required to organize, staff, and stand up a new organization. This would be problematic and quite risky during the ongoing fire season.

While the suppression organization is important, there is an urgent need to address the root causes of catastrophic wildfire, which include overly dense forests, development in the wildland-urban interface, and changing weather patterns. Reducing the wildfire threat will require more forest thinning including timber harvest, if done correctly.

Increased mechanical treatments, and the application of lower intensity fires to build forest resilience are also key elements to success. Continuing to emphasize fire suppression efforts without front-end investment in treatments across large, forested landscapes will not address the catastrophic wildfire problem. Adequate agency staffing is key to successfully addressing all these variables.

Aviation is a huge component of the USFS firefighting effort. It is also the costliest of the wildfire suppression tools. Part of the proposal to consolidate agencies would apparently reduce oversight by agency aviation inspectors. Aviation inspection procedures have been developed over the years because of tragic aviation related fatalities. The current fire aviation safety record reflects positive changes that have been implemented due to agency inspections. The current procedures are in place to ensure a safe working environment for air crews, resources on the ground, and the public.

Beyond aircraft safety, we are concerned that an emphasis on fire suppression without the necessary work to reduce fuels and fire severity may lead to catastrophic outcomes for firefighters. Recent personnel reductions have not been beneficial to efforts to reduce wildfire.

Forest Service documents indicate that to date, through the various actions, the Forest Service has lost over 1,600 “red-carded” wildland fire qualified personnel. This does not include the losses associated with probationary employees who did not return after their February 14th firing. According to the National Federation of Federal Employees, about 75% of the terminated probationary employees had red-cards and were wildland fire qualified.

In addition, the availability of Complex Incident Management Teams is expected to be dramatically affected. This coupled with the losses of hundreds of non-primary fire positions which support the fire response, will result in dramatic resource shortages, resulting in greatly diminished public and firefighter safety and more impactful wildland fires.

Rather than creating a single suppression organization, we recommend that Congress and the agencies focus on measures that would address the root causes of catastrophic wildfire and ensure suppression and prevention strategies are integrated with broader forest management goals.

The National Cohesive Wildland Fire Management Strategy (2009), which we and many other entities have supported, is a strategic plan to work collaboratively among all stakeholders and across all landscapes to make meaningful progress towards the three goals of (1) Resilient Landscapes, (2) Fire Adapted Communities, and (3) Safe and Effective Wildfire Response.

The recent Wildland Fire Mitigation and Management Commission developed a list of 148 recommendations and reflects one of the most sweeping and comprehensive reviews of the nation’s wildland fire management framework to date. The Commission’s final report was submitted to Congress in September 2023. Many of these recommendations are currently identified in the Senate version of the *Fix Our Forests* legislation.

We appreciate your consideration of our views, and we stand ready to assist you to address the many variables that contribute to catastrophic wildfire.

Sincerely,

Steve Ellis

Steve Ellis, Chair
National Association of Forest Service Retirees