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November 20, 2025

A personal copy of this letter was sent to -  
 Senators – Murray, Collins, Heinrich, Lee, Boozman, Klobuchar  
 Representatives – Cole, DeLauro, Huffman, Westerman, Craig,  
 Thompson

As an organization representing thousands of long-tenured retired USDA Forest Service employees with unparalleled experience and expertise in all facets of forest management, NAFSR opposes the proposed transfer of the USDA Forest Service to the Department of the Interior (DOI) as a whole or in part.

Proposals to transfer the Forest Service to DOI are as old as the agency itself and have been rejected in each instance for reasons that are still compelling today. Alternatives that save costs and enhance interagency cooperation across federal departments are available, proven, and can be improved and strengthened without the disruption and expense that inevitably would come with the proposed transfer.

**Forest Service History and Purpose are Aligned with USDA**

The Forest Service was placed at USDA in 1905, primarily through the efforts of Gifford Pinchot and then-President Theodore Roosevelt to oversee the nation's "forest reserves". Of primary concern at the time was that the Department of Interior (DOI) was too politically

influenced and therefore posed a greater risk to the purpose of why these "national forest reserves" were set aside.

Pinchot and Roosevelt saw firsthand the damage from overgrazing and deforestation—soil erosion, degraded watersheds, and loss of wildlife habitat. Subsequent Acts of Congress directed the Forest Service to manage federal lands under principles of multiple use, sustained yield, and long-term conservation, to provide goods and opportunities for all Americans.

Initially, the agency focused on sustaining supplies of water and timber. Importantly however, the Forest Service mission was and continues to be focused on sustainable use of forests across the nation, including on state and private lands in addition to federal lands. As a result, the agency has developed significant programs in private landowner assistance, community support, and associated research and development—all areas within the wheelhouse of USDA. These programs continue today to fill critical roles for promoting all-lands forest management in rural areas of the nation.

We are also concerned that moving the entire Forest Service might lead to subsequent transfer of selected portions, such as National Recreation Areas, to other DOI agencies or entities which would disrupt the continuity and multiple-use nature of National Forests.

Since the *Organic Act of 1897*, which provided guidelines for managing forest reserves, Congress has reinforced the agency's role in supporting economic uses of forests across all lands in line with USDA's mission. *The Multiple-Use Sustained-Yield Act of 1960* expanded expectations for public use of national forests for products and services, including the sustained flow of timber products. *The Cooperative Forestry Assistance Act of 1978* charged the agency to provide financial and technical assistance to states and private landowners on a variety of forestry issues, including forest management and stewardship, fire protection, insect and disease control, reforestation and stand improvement, and urban forestry. Farm Bills continue to include significant provisions for Forest Service assistance to private forest landowners.

Many of these acts have reinforced the notion that the Forest Service serves as the nation's forester, helping with the stewardship of so much more than the National Forest and Grasslands. As a result of these mandates, the Forest Service has developed close working relationships with state forestry agencies and with our USDA sister agency, the Natural Resources Conservation Service (NRCS), to support economic sustainability for private landowners. These landowners often own an intermixture of forest and agricultural land, requiring integrated support.

In addition, the Forest Service has a long history of contributing directly to local economies by sharing public use revenues from national forests with local counties, most recently through the *Secure Rural Schools Reauthorization Act of 2025*.

Forest Service Research and Development also supports USDA mission areas, especially through the Forest Inventory and Analysis program, a continuous nationwide survey of condition of the nation's forests. Data from this program is used for variety of purposes and users, including the forest products industry. In addition, the Forest Service's National Forest Products Lab has been instrumental in developing economic utilization of forest products, creating value and new industries from what was previously considered waste.

Moving the Forest Service to DOI would likely subsume these Forest Service Research and Development functions into USGS, disrupting relationships with economic interests and state and private partners. There could also be adverse impacts from disrupting long-term investments in research studies on national forest lands. Our position on the importance of maintaining Forest Service Research and Development can be found here: [062325 Generic Version FS Research FY26 Appropriations.pdf](#)

In short, the long history of Forest Service program development and Congressional mandates makes the agency a powerful tool for the Secretary of Agriculture to use in accomplishing the mission of USDA, especially in natural resource management, community development, and economic sustainability of private landownership. Transfer of the Forest Service to DOI could hamper the Secretary's ability to meet USDA's mission.

### **Fire Management is Integral to Land Management Agencies**

We expressed our concerns with moving Forest Service fire and fuels programs into a DOI National Fire Service agency in a previous letter to Congress found here: [061025 Single Wildland FF Agency.pdf](#)

Our concerns come from deep experience in making USDA Forest Service the national, and it could be argued a global leader in fire management, borne from the critical role fire plays in both sustaining and damaging forests and surrounding communities. As result of this expertise, the Forest Service is designated the Primary Agency for Emergency Support Function #4—Fire Fighting—under the National Response Framework for emergency management. Through extensive cost, long effort, and sometimes painful experience, the Forest Service has worked successfully with many federal and state partners to develop comprehensive and effective structures for interagency coordination in wildfire response, such as the National Interagency Fire Center, National Wildfire Coordinating Group, and standing Incident Management Teams under the Incident Command System. Fire missions vary between federal agencies and states.

For example, the Forest Service primary focus is heavy fuels fires, while BLM's power swing lies more in dealing with the finer fuels such as running rangeland fires. States' focus is primarily defined by their respective legislative and policy mandates. The current coordination structure recognizes these unique differences and has been a proven fit for all parts of the country, and in some cases internationally.

We fail to see where one stove-piped structure will maintain unique agency expertise that is very integrated with their respective resource programs and needs, which are widely dispersed to all ownerships and corners of the country. If improvements to cooperation and efficiency in wildfire response are needed, remedies can and should be pursued through existing, and largely effective interagency structures.

Just as importantly, fire management is a necessary and integrated part of land management. Wildfire management is more than extinguishing fires and is woven and integrated into every

core resource management program the Forest Service has. Wildfire response gets the attention, but it is just a highly visible piece of total fire management. Total fire management includes prescribed fire and fuels reduction treatments that are frequently integrated with all vegetation management including timber sales and domestic livestock grazing, and require coordination with recreational uses, watershed protection, and wildlife management.

Expertise for accomplishing wildfire suppression and total fire management is found in the same employees—take them away from a land management agency and you’ve crippled integrated management of both fire and other key resource management programs. In addition, fire management demands are episodic, allowing fire employees to contribute to other resource management goals during down periods, and integration of qualified non-fire employees into wildfire or prescribed burning efforts under peak demand. Separating these elements of the workforce will decrease efficiency and effectiveness and increase costs for all land management agencies and therefore the taxpayer.

### **Reorganizations are Costly and Often Inefficient**

Our experience with government reorganization efforts shows them to be disruptive, costly, and often ineffective at achieving desired efficiencies. Fully implementing transfer of the Forest Service to DOI would likely take years, necessitate Congressional action and agreement about modifying multiple existing legislative mandates, cost taxpayers a lot of money, and distract from accomplishing important work on the ground.

We fail to see the compelling need driving this voluntary acceptance of disruption, cost, and distraction. Any objectives for which the proposed transfer is aimed would seem to be better achieved, through a much shorter path, by working within existing structures.

We believe there are also benefits from having federal land management under jurisdiction of two Secretaries. In addition to agency missions being better aligned to one department or another, advocacy of two Secretaries for these different missions helps ensure the full range of federal land uses are represented in the President’s Cabinet and ultimately provided for the American people.

As stated previously, we feel the ability of the Secretary of Agriculture to accomplish the USDA mission would be significantly hampered by the transfer. In addition, we can speak from experience to the effectiveness of authority and accountability for administration priorities, passed through the Agriculture Secretary and Under Secretary for Natural Resources and Environment to the Forest Service Chief and hence to all agency employees.

Forest Service employees absolutely expect and are practiced at shifting emphasis and activities across multiple-use programs based on leadership communications that address administration priorities and Congressional appropriations. At the same time, forest management is by nature a long-term activity, so institutional and subject matter expertise is needed to incorporate short-term priorities into ongoing long-term forest management. The Forest Service Chief and their

team, typically with deep experience in the agency, have historically ably served this role. We would not want to see this prime example of effective government function disrupted by a departmental transfer.

### **An Alternative Approach**

We suggest proven, much more workable, less expensive, and less impactful options for meeting transfer objectives. These include expanding opportunities and flexibilities for interagency coordination and cooperation among all federal land management agencies through models like “Service First” authority, which currently allows Forest Service and BLM to co-locate and share personnel.

Other authorities, such as expanded “Good Neighbor Authority,” which help enhance Forest Service and state forestry agency cooperation, are what is needed. Efforts to integrate across agency boundaries for better and more efficient public service are already happening at local levels and should be encouraged and enhanced through targeted and innovative authorities and initiatives, developed with career employee input.

Additional tools, authorities and resources would enable the Forest Service to build on its recent accomplishments in reducing wildfire fuels and improving the health of the nation’s forests. For example, enactment of the *Fix Our Forests Act (H.R. 471)*, which NAFSR supports, would help expedite necessary forest management projects. Restoration of funding for fuels work would also help, along with the staff, to support such work. These improvements are available to Congress now, without the unnecessary costs and disruption of an agency transfer.

In summary, we believe that federal land management agency histories and missions are different for good reasons and support different Department-level missions. These differences have resulted in different agency expertise, functions, and programs that should not be dismissed with disruptive, and expensive top-down reorganization proposals. Alternative approaches to meeting transfer objectives exist and can be developed using current models and authorities for integration and coordination. As experienced retired employees, we remain willing to assist and provide additional details on these approaches.

Sincerely,

*Steve Ellis*

Steve Ellis, Chair  
National Association of Forest Service Retirees