

Secretary Doug Burgum
U.S. Department of the Interior
1849 C St, NW
Washington, DC 20240

Secretary Brooke Rollins
U.S. Department of Agriculture
1400 Independence Ave, SW
Washington, DC 20250

March 19, 2026

Dear Secretaries Burgum and Rollins,

We write today to provide input regarding the forthcoming report discussing potential consolidation of the U.S. Department of Agriculture's U.S. Forest Service wildland fire management functions into the newly created U.S. Wildland Fire Service at the U.S. Department of the Interior (DOI).

In the explanatory notes for Division C of the Department of the Interior, Environment, and Related Agencies Appropriations Act of 2026, Congress made clear that before any consolidation effort would be considered by the relevant congressional leaders, that the Secretaries of Agriculture and the Interior ought to “contract with an independent, nonpartisan research organization with expertise in federal land management to conduct a comprehensive study on the feasibility of consolidating wildland fire management operations...”

As you know, the Forest Service depends on an integrated, multidisciplinary workforce to plan and carry out interrelated land management activities—including vegetation management, hazardous fuels reduction, habitat conservation, post-fire recovery, and wildfire response. We are concerned that moving the agency's wildland fire management personnel and programs elsewhere could undermine the agency's multiple-use mission, which includes timber production, ecosystem health and restoration, clean water resources, and recreation, as well as wildland fire management. We offer the following recommendations to help ensure the study remains impartial and reflects the broader implications of consolidating wildland fire functions into a separate agency.

1. Objective Third Party: As you consider options for independent, nonpartisan research organizations to conduct the study, we encourage you to look outside of the wildfire

space toward organizations with expertise in federal land management, as Congress directed. Many organizations with expertise in wildfire issues – including but not limited to the undersigned – have valuable insights to provide but already have pre-existing views on the proposed consolidation. We recommend that you consider an impartial and nonpartisan research organization without conflicts of interest or pre-existing views on the proposed consolidation to carry out this comprehensive study.

2. Pros and Cons, Not Recommendations: As you know, the Government Accountability Office has already considered many of the potential questions related to the comprehensive study that Congress has called for, albeit many years ago and under different circumstances. As you consider which research organization to contract with to carry out this study, and as you contemplate the study's scope, we recommend that the study seek to avoid explicit conclusions as to whether consolidation should or should not happen, but rather present the pros and cons of such a consolidation in a neutral and even-handed manner so that Congress can make an informed decision on the proposal in the President's Budget.
3. Impacts to Other Agencies, Mission Areas, and Critical Functions: While the main thrust of the forthcoming study will logically consider impacts to the wildfire-related functions of the Forest Service and the new Wildland Fire Service at DOI, we encourage you to develop a scope of work for the study that also considers the impacts of the potential consolidation on other agencies and mission areas at DOI and the Forest Service. For example, the study should consider impacts not only to current wildland fire management operations, but also to DOI bureau and Forest Service capacities for forest and rangeland restoration and fuels mitigation, including efforts both before and after wildland fires. The study should evaluate not only the efficiencies of proposed consolidation, but also the effectiveness of agencies post-consolidation in delivering on the full suite of their statutorily mandated functions, including conservation, multiple use, and sustained yield.
4. Examine the Totality of the Wildfire Crisis: As you consider the forthcoming study's scope and the contractor to perform the work, we encourage you not only to look at narrow questions related to the purported operational efficiency of the proposed consolidation, but also to broader, more fundamental questions related to the wildfire crisis overall. For example, the study should:
 - a. Research and report on the role of historic fire suppression as a driver of today's wildfire crisis.
 - b. Consider the effectiveness of assorted wildfire suppression tools and strategies, including deployment of aviation assets.

- c. Assess the need for strategic pre-fire hazardous fuels mitigation to reduce wildfire impacts and future suppression costs.
- d. Examine the effectiveness of non-suppression, non-forest management strategies to reduce the risk of wildfire losses, such as home hardening and other community wildfire adaptation strategies.

Thank you for your consideration of the above sentiments and recommendations. We believe that an impartial and fact-based report guided by these recommendations will provide Congress and outside stakeholders with the comprehensive information needed to evaluate the proposed consolidation of federal wildland fire management operations.

Sincerely,

American Forests
Conservation Northwest
Environmental Defense Fund
Forest Stewards Guild
ForEverGreen Forestry
Firefighters United for Safety, Ethics, and Ecology (FUSEE)
National Association of Forest Service Retirees (NAFSR)
Outdoor Alliance
Public Lands Foundation
Rural Voices for Conservation Coalition (RVCC)
Silvix Resources
The Ember Alliance
The Nature Conservancy
The Wilderness Society
Wild Montana