



For America's Heritage

Public Lands Foundation

P.O. Box 7226 Arlington, Virginia 22207

May 20, 2025

This letter was sent to Congressional Appropriations
and Authorization Committee Leadership
Washington, D.C. 20510

Dear Senator/Representative:

On behalf of the Public Lands Foundation (PLF), I am writing regarding the proposals to create a single wildfire management agency that would consolidate all federal wildfire operations within the Department of the Interior, or the Department of Homeland Security. The PLF has concerns with this proposal and we feel that, as currently proposed, it will result in unintended consequences and would not address the causes of catastrophic fire or make communities safer.

As a national, non-profit organization, comprised principally of retired Bureau of Land Management employees, the PLF has a unique body of experience, expertise, and knowledge of public land and resource management, including the management of vegetation, of which fire and fuels management is an integral part.

Wildland fire management is more than suppression, it involves planning that is integrated with the agencies' statutory land management goals and missions. It requires the coordination of the integrated resource expertise found in the BLM and other agencies, such as foresters, wildlife biologists, hydrologists, range specialists, and fire and fuels management specialists.

Suppression alone will not prevent the types of catastrophic fires that are plaguing the Nation today. The fires are the result of warmer atmospheric conditions, expansion of the urban interface, and accumulation of vegetative fuels. Addressing these conditions is the primary way that catastrophic fires can be addressed. Mitigating for these conditions takes coordinated planning and implementation of vegetative treatments, such as mechanical thinning, grazing, and prescribed burning. The link between suppression and the important mitigation work cannot be broken. We are concerned that the proposed organization will break that link. Where the Administration and the Congress could help is to encourage and

expand the mitigation work that is in progress and help reduce some of the lengthy processes required to implement the mitigation. The *Fix Our Forests Act* is a step in the right direction, and we support its passage.

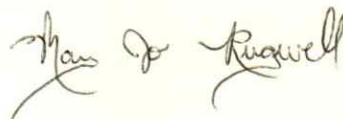
The current fire organization is the result of decades of development that has involved coordinated efforts by federal agencies, state forestry agencies, tribes, and private partners. Recognizing the need for a coordinated approach, the National Interagency Fire Center was established, along with the National Wildfire Coordination Group to set uniform training, equipment, and qualification standards. The Incident Command System that is a part of this coordinated effort is a model that is being used across the Nation and in several foreign countries. Improvements to these approaches to increase efficiencies and effectiveness can and should be made, however creating a new organization, absent the involvement of the many current partners will not result in a more efficient structure.

We are also concerned with the recent loss of “red carded” employees. Aviation assets and engines, while extremely important do not suppress fires or conduct prescribed burns. It comes down to qualified boots-on-the ground and the recent layoffs have significantly impacted the number of qualified fire personnel. Each of the land management agencies have thousands of fire-qualified personnel, beyond primary firefighters, that play a critical role in supporting and staffing fires in capacities ranging from firefighter to members of Complex Incident Management Teams. These are employees that have other land management jobs and are available for fire assignments when needed and are critical to the overall wildfire management organization.

The recent Congressionally chartered Wildland Fire Mitigation and Management Commission developed a list of 148 consensus recommendations that was submitted to Congress in September 2023. These recommendations reflect the most recent and comprehensive review of the Nation’s wildland fire framework to date, and we encourage considering these recommendations as improvements to wildland fire management move forward.

Thank for the consideration of our views. The PLF stands ready to assist as you address these complex issues.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mary Jo Rugwell".

Mary Jo Rugwell, President