POLICY BRIEFING PAPER | ALLIANCE OF FOREST SERVICE RETIRED FIRE LEADERS

Wildfire Reform Should Strengthen Both Fire Response and Forest Stewardship

Wildfire Reform Should Be Judged on Results, Not Party

No reorganization will eliminate catastrophic wildfire. The question is whether federal agencies are organized to manage wildfire risk, sustain a professional workforce, and steward public lands with clear accountability. Structure determines who sets priorities, how resources are deployed, and who is accountable when systems fall short.

These questions are neither new nor partisan. In 2002, the Government Accountability Office raised concerns about fragmented federal wildfire leadership. Interagency Quadrennial Fire Reviews followed in 2005, 2009, and 2014; a congressionally established commission again examined the nation's wildfire management system in 2023. These efforts did not all endorse the same solution. They demonstrate a longstanding need to assess federal wildfire organization.

The Alliance of Forest Service Retired Fire Leaders supports consolidating federal wildland fire programs within a U.S. Wildland Fire Service (WFS), with centralization of the Forest Service's fire management organization as an interim step. Concerns have been raised about integration with land management, operational disruption, costs, workforce effects, and forest restoration. Both those concerns and the current system's limitations warrant scrutiny. The appropriate test is not whether reorganization carries risk, but whether a thoughtfully designed alternative can deliver better results than the current system.

1. Fire and land management can remain fully integrated

Wildfire management and land stewardship are closely connected, but effective coordination does not require every participant to work for the same agency. The Forest Service would continue to establish land management objectives, identify values at risk, develop projects under its Land and Resource Management Plans, and exercise its statutory responsibilities. A WFS would be responsible for organizing and maintaining the qualified fire management capability needed to support those objectives.

The interagency large-fire response system provides a practical model. Complex Incident Management Teams already manage incidents on lands administered by agencies other than those employing their members. The responsible Agency Administrator sets incident objectives and delegates specified authority to the Incident Commander. An Agency Representative maintains coordination and may exercise decision authority when it is expressly delegated. Resource specialists contribute their expertise as conditions require. These established relationships demonstrate that land management authority and fire operations can remain connected without a common chain of employment.

The same principles can guide prescribed fire and hazardous fuels projects. Interdisciplinary planning would continue to involve fire personnel and specialists in vegetation, wildlife, watersheds, and other resource areas. Land management agencies would establish objectives and provide necessary approvals; WFS personnel would bring specialized fire expertise to project design and lead the fire-specific operational work. Agreements would need to specify planning responsibilities, environmental compliance, resource requests, scheduling, operational authority, and how competing priorities are resolved. Integration should be assessed by how it functions, not inferred from a shared organizational chart.

2. Transition risks should be managed, not used to defend the status quo

Moving a major federal program would affect personnel systems, reporting relationships, budgets, facilities, administrative support, and labor-related matters. Employees need clarity on duty stations, supervision, careers, and job security. These are genuine transition risks. Authorities, workforce protections, operational responsibilities, and implementation phases should be established before functions move, with readiness monitored throughout the transition.

At the same time, the federal wildfire response system is already organized for interagency mobilization. The National Interagency Coordination Center, Geographic Area Coordination Centers, and National Multi-Agency Coordinating Group provide established mechanisms for coordination and allocation of scarce resources. Consolidation should preserve these systems while clarifying authority and accountability for the federal firefighting workforce.

The current Forest Service structure places firefighters under local land management leadership whose responsibilities extend well beyond fire. Local discretion is essential to initial attack and immediate public safety, but it can also produce inconsistent priorities when national fire activity increases. Field experience includes occasions when otherwise deployable personnel were retained for planned local projects instead of requested wildfire assignments. Its frequency should be evaluated. Nevertheless, retaining firefighters for legitimate local protection needs is different from withholding them to meet routine project deadlines.

A unified service should therefore combine consistent national priorities with decentralized operational judgment. Local drawdown requirements would continue to protect initial attack coverage, while objective risk assessments would inform how those minimums are established and periodically adjusted. Qualified, properly staffed resources above those requirements could be made available for national assignments as conditions permit. Centralizing strategic accountability should not mean directing every tactical or staffing decision from Headquarters, but would be best served by deferring to local fire management expertise.

3. Costs and capacity must be judged against mission requirements

The federal government already funds separate wildland fire management organizations within the Departments of Agriculture and the Interior. A unified WFS would principally consolidate existing functions and personnel rather than create an entirely new firefighting capability. It could reduce duplication in national leadership, oversight, and administrative functions. It would also incur transition costs, and neither long-term savings nor improved performance should be promised without evidence. The measure is capability and public safety outcomes relative to investment.

A more important opportunity is to reassess how the firefighting organization is designed. Historically, the Forest Service used the National Fire Management Analysis System to estimate initial attack resource needs through analyses of fire occurrence, weather, fuels, response times, resource performance, and cost. Those systems are no longer in use. Modern wildfire risk assessments, fire behavior models, and decision-support tools do not necessarily provide a consistently applied process for resource numbers, types, and placement.

A science-based workforce planning framework should explicitly address two linked missions: maintaining effective local initial attack and sustaining national large-fire response. Local requirements should reflect fire occurrence, current risk, expected fire behavior, response times, resource capability, and cost. National requirements should account for simultaneous major incidents, assignment duration, rotations, geographic differences, and the need to maintain local coverage. Mobilizing resources

efficiently is not the same as ensuring that enough qualified resources exist to mobilize. Both questions belong in organizational design.

Reported initial attack success rates have historically remained near 95-98 percent, a meaningful accomplishment under increasingly challenging conditions. That measure alone, however, does not establish that resources are optimally distributed or that the national system has sufficient depth for extended operations. Performance evaluations should also examine resource availability, response times, escaped fires, firefighter safety, the ability to sustain large-fire assignments, and overall costs. For hazardous fuels work, acres treated should be considered alongside measurable reduction in wildfire risk and improvements in community protection.

4. A professional workforce needs a clear mission and meaningful accountability

Wildland firefighting is a specialized profession, not simply another function within a general land management organization. Its responsibilities include preparedness, suppression, prescribed fire, and hazardous fuels management. As operations become more demanding, personnel need focused training, practical experience, professional development, and time to maintain qualifications. Assignments to unrelated restoration work can compete with those requirements and with emergency response readiness.

A dedicated WFS could establish clearer expectations for professional development and career progression while reducing conflicts between firefighting duties and non-fire projects. That possibility should not be mistaken for a guarantee of better morale or retention. The effects should be measured through staffing stability, training opportunities, qualifications, operational readiness, and employee experience.

Accountability must extend beyond organizational charts. A unified service could apply consistent program reviews and a fire-specific Safety Management System built around qualified leadership, risk controls, learning reviews, documented corrective actions, and follow-through. Local experience and field judgment must remain central to safe operations. Consolidation will be worthwhile only if leadership uses the clearer structure to identify weaknesses, correct them, and measure whether safety and readiness actually improve.

5. Forest restoration remains a land management responsibility

Consolidating federal fire programs would not remove forest health, restoration, watershed protection, or other land management responsibilities from the Forest Service. Nor should it separate prescribed fire from fire management. Prescribed burning and fire-related hazardous fuels work are essential parts of the wildfire profession and would continue to require close coordination with the agencies that establish landscape objectives.

Under a coordinated model, land managers would identify restoration priorities and conduct the non-fire portions of those projects. Where a treatment also requires prescribed fire, the WFS would participate in planning and provide qualified personnel and equipment for implementation. Annual work plans, resource-request procedures, agreed treatment objectives, and clear approval authority would be necessary to deliver those projects reliably.

If a separate fire organization exposes shortages in the staffing or funding of non-fire restoration programs, those needs should be addressed directly. Relying on firefighters as a standing substitute for a dedicated restoration workforce does not resolve the underlying capacity problem. The objective should be two capable organizations with clearly defined responsibilities and dependable working relationships, not a competition between wildfire protection and stewardship.

Judge the reform by results

A feasibility study should evaluate the full federal wildfire mission: initial attack, national large-fire capacity, preparedness, workforce development, safety, prescribed fire, hazardous fuels, costs, and coordination with land management agencies. It should compare realistic transition risks with documented limitations of the current arrangement, establish measurable objectives, and require periodic review and corrective action. A study focused on suppression alone would miss the organizational design challenge.

Consolidation by itself cannot guarantee better outcomes. But clearer missions, consistent national priorities, science-based resource planning, professional fire leadership, and accountable implementation offer a credible basis for improvement. The choice is not between wildfire management and land management. The federal government must do both well: land management agencies remain responsible for stewardship, while a Wildland Fire Service manages wildfire capability in close partnership with them.

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