

The Honorable Joe Biden  
President of the United States  
1600 Pennsylvania Ave  
Washington, D.C. 20500

The Honorable Kiran Ahuja  
Director, Office of Personnel Management  
1900 E Street, NW  
Washington, D.C. 20415

The Honorable Tom Vilsack  
Secretary of Agriculture  
1400 Independence Avenue, SW  
Washington, D.C. 20250

The Honorable Deb Haaland  
Secretary of the Interior  
1849 C Street, NW  
Washington, D.C. 20240

October 17, 2022

Dear President, Director, and Secretaries,

Federal Wildland Firefighters have been pushed to their limits for decades. Low pay, demanding work, and a lack of work/life balance has left our workforce depleted and frustrated. Federal Wildland Firefighters have the most dangerous civilian job in America, with over 24 line of duty deaths already in 2022 and counting. Cancers, traumatic injuries, death, PTSD, divorce, suicide, are the sad results of a workforce that is underappreciated and not properly supported by their federal employers. Federal wildland firefighters are unrecognized and often-forgotten first responders.

Wildland firefighters can easily earn up to 1,500 hours of overtime and spend 120 nights away from home in only a six-month period; with fire seasons extending into fire years, and additional fuels targets in the offseason being added to their duties, we need to support these brave wildland firefighters and their families more than ever.

Although this workforce has unique challenges, they are not offered many work-life balance benefits that almost all other federal employees receive. We urge you to make available the existing work-life balance programs offered through OPM to these employees. Additionally, we are making recommendations below that we urgently ask you to implement and fund in your FY 2024 budget requests. Benefits these uniquely skilled federal employees should be offered are not limited to our suggestions, but this is a starting point for overdue reforms:

Fair Pay:

Federal wildland firefighters deserve an income that is plannable and equitable to their first responder counterparts. A permanent pay solution is imperative to the recruitment and retention of the federal wildland firefighting workforce.

- Maximize the usage of cash awards, quality step increases (QSI) and other financial incentives for all fire personnel. These small wage increases pale in comparison to the investment loss from employees resigning and retraining new workers.

- Promote the workforce to the highest grade level of non-supervisory position possible. This means reorganizing the organization charts so that everyone is qualified and paid at the highest non-supervisory level possible. Ensure classification process and grade determinations are based on real world duties and common Interagency Fire Program Management Standards (IFPM) qualifications and not biased towards maintaining current, outdated organization charts.
- Request from OPM a new pay schedule that codifies the Bipartisan Infrastructure pay levels. This would translate to entry level being at \$22.50/hour basic pay, and then return to General Schedule (GS) parity at the GS-13 level, or an even higher rate.
- Utilize the maximum Cash Awards allowable or find other, creative ways to bridge the financial gap employees face when injured on the job. Provide QSI for employees that cannot continue to perform their standard duties after injury. Provide priority details into non-arduous, remote-work vacancies while the employee is recovering. Charities are unacceptable for employees injured on-the-job, yet they are the norm today.
- Provide portal to portal pay for federal wildland firefighters, or at a minimum, direct local managers to make 16-hour days the standard for resource orders, regardless of fire activity, Rx assignment or pre-position status.
- Expand Hazard Pay to include prescribed fire operations, parachute jumping, tree climbing over 20 feet, and hazard tree felling. Hazardous duty pay means duty performed under circumstances in which an accident could result in serious injury or death (<https://www.ecfr.gov/current/title-5/chapter-I/subchapter-B/part-550/subpart-I/section-550.902>). These duties certainly meet the criteria.
- Fund all positions as career positions, allowing any temporary employees to accept career positions if desired. While some may opt to stay as temporary due to school or scheduling, all wildland firefighters deserve retirement credit and health insurance, at a minimum.

#### Work-Life Balance and Families:

At a minimum, the current work to rest ratio needs to be reconsidered holistically. It currently applies to operational shifts, but does not apply to a fire year or a fire career. As we have moved into a fire year, federal wildland firefighters and their families are suffering the consequences. A modernized work to rest ratio or federal wildland “kelly” schedule has the ability to improve the work-life balance for the federal wildland workforce and improve on response capacity of the federal land management agencies. Some options may include:

- Move assignment lengths to 10 days with 5 days of R&R, exclusive of travel. We need a workforce ready for the mission throughout the year. The current schedule of 14/3 is unsustainable year after year.
- Initiate a scientific examination of the appropriate work to rest ratio for a civilian wildland firefighting workforce taking into account both physical and psychological needs.
- Award annual leave awards of 40 hours at minimum whenever an employee works 500 hours of overtime in a calendar year.
- Utilize existing child care subsidy programs and make available to firefighters: <https://www.opm.gov/policy-data-oversight/worklife/dependent-care/>
- While wildland firefighters are on assignment, work/life is completely work, so new efforts must be made so the balance shifts to life priorities while not on assignment.

## Housing:

- Stop deferring maintenance on employee housing.
- Keep housing costs as low as possible by accurately describing conditions and facilities.
- Explore and verify a hub and spoke model of the federal wildland firefighting workforce. Maintain remote duty locations, but base their staffing on fire danger and prescribed fire opportunity.
- Consolidate hard to fill geographic areas to centralized locations and move resources to remote duty locations as fire danger and response needs dictate.
- Move away from remote duty locations and begin to staff with resource orders and per diem if duty location is far from schools, communities, childcare options, etc. If the duty location is remote, allow employees to report to non-remote locations such as the supervisor's office and work or drive from there.

## Firefighter Support and Funding Parity:

- With any increase in firefighter staffing, ensure adequate funding across modules to support the need for additional equipment such as vehicles, radios, tools, EMS training and supply needs, to enable fire modules to safely and effectively support their personnel and mission. The Interagency Hotshot Crew program saw approval to move from 20 personnel to 25 in 2022, but this did not come with the additional funds needed to support this expanded program.
- Ensure funding parity across geographic areas for equivalent firefighting modules. For example, Hotshot crews or engine modules in different regions may have different budgets making recruiting and retaining personnel difficult in the lesser-funded areas.

## Environmental Exposure:

- Immediately issue guidance to mitigate environmental hazards like smoke and particulate matter exposure.
- Instruct Incident Management Teams (IMTs) to move camps and make sleeping locations flexible to avoid smoke inversions when possible. Once an air quality threshold is met, utilize sleeping trailers, Airbnbs, hotels, and other indoor locations that can filter the air.

## Executive Actions for President Biden:

- While we await permanent legislation, issue an executive order to allow federal wildland firefighters to “buy back” their temp time. It is common for wildland firefighters to work for 10 years as a temporary employee, without health insurance or retirement benefits. This situation subverts the intent of federal “special category” retirement, where a 20-25 year retirement is offered due to high physical and mental demands as well as increased risk of cancers, injuries and death.
- We also seek to have all of our work count towards our retirement calculation. Currently, the majority of federal firefighter compensation often comes from overtime and hazard pay, which do not count towards retirement benefits. We would like to see our work recognized, despite our irregular schedule. Wildland firefighters and their families make incredible sacrifices to earn overtime and hazard pay, and that should be reflected in our retirement.

Doing the right thing won't be cheap, but the cost of inaction will be exponentially higher in property loss, poor air quality affecting public health, suppression costs, and countless injuries and lives lost. Last year President Biden slammed his fist on his desk and declared the pay was "ridiculously low" and Secretary Vilsack stated that "We can no longer fight fires on the cheap." We have been patiently awaiting needed reforms, and this is a first step.

Respectfully,



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Luke Mayfield, Vice President  
Grassroots Wildland Firefighters



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Randy Erwin, President  
National Federation of Federal Employees (NFFE)



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Jimmie Rocha, Vice President  
US Hotshots Association

