
June 10, 2026

Ana Paunoiu
Human Resources Management
U.S. Office of Personnel Management
1900 E Street NW
Washington, DC 20415

Re: Differential Pay for Prescribed Wildland Fire Activities

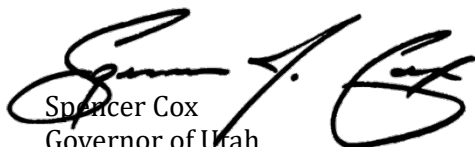
Dear Ms. Paunoiu:

Western Governors applaud the Office of Personnel Management's (OPM) recent proposal to add prescribed wildfire as a covered activity that triggers payment of Hazardous Duty Pay for General Schedule employees and Environmental Differential Pay for Federal Wage System employees (Docket ID: OPM-2026-0199; 91 FR 19081).

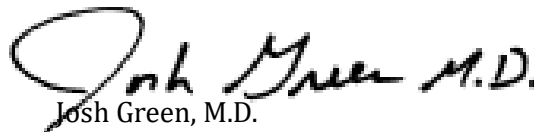
Western Governors explicitly recommend that federal agencies authorize hazard pay for federal firefighters performing prescribed fire operations. Western Governors support a broad range of wildfire mitigation practices, including prescribed fire. To enable the expanded use of this critical tool, Western Governors call on the federal government to consider additional steps to recruit and retain an effective land management and wildland firefighting workforce, including the use of hazard pay for prescribed fire activities. For further context, Western Governors' collective, bipartisan policy on forestry can be found in Western Governors' Association (WGA) Policy Resolution 2024-02, National Forest and Rangeland Management, which is attached.

Thank you for your leadership on this important issue. Western Governors stand ready to assist OPM as this proposed rule advances through the regulatory process.

Sincerely,



Spencer Cox
Governor of Utah
Chair, WGA



Josh Green, M.D.
Governor of Hawai'i
Vice Chair, WGA

Attachment



Policy Resolution 2024-02

National Forest and Rangeland Management

A. **BACKGROUND**

Western states contain over 75 percent of the national forest and grassland system, and communities in the West depend upon forests and rangelands for jobs, recreation, and quality of life. Conversely, effective natural resource management is only possible if rural and resource-dependent communities are healthy, vibrant, and prosperous. These forests and rangelands provide a number of important ecosystem services that drive local economic activities including grazing, forest products, and recreation. The majority of surface water in the West originates in National Forests as well, and western water security is directly tied to the health of western forests. Both natural disturbances and management decisions have the potential to fundamentally alter the complex, interdependent relationship between communities and land. Climate change can accelerate these dynamics by increasing the frequency and severity of fire, altering hydrologic patterns, and expanding the potential range of invasive species. Furthermore, states have a unique interest in active land management and improving lands' resilience against disturbances because state governments have trust authority over water, wildlife, and forest resources, along with primary authority and expertise to protect community health and safety.

B. **GOVERNORS' POLICY STATEMENT**

1. Western Governors support sound forest and rangeland management policies that maintain and promote ecologic, economic, and social balance and sustainability.
2. Western Governors support the creation of mechanisms to identify and enhance cross-boundary collaborative work.
3. Western Governors point to the Western Governors' Association (WGA) – U.S. Department of Agriculture (USDA) Shared Stewardship Memorandum of Understanding (MOU) as an example of an effective framework to establish shared state-federal priorities for forest and rangeland management and encourage the development of similar MOUs with other Executive Branch agencies for other areas of natural resource management.
4. Effective forest and rangeland management is only possible through coordination between federal, state, local, and tribal land management agencies. These agencies should strive to find new ways to collaborate on forest and rangeland management projects, as well as to explore ways to improve state-federal coordination on existing management projects. Shared Stewardship Agreements between states and USDA are a good example. Federal agencies should look to local communities as a source of strength, knowledge, and support during the planning and implementation of forest and rangeland management projects and should be encouraged to work with local communities while planning forest and rangeland management projects. The U.S. Forest Service (USFS) and Bureau of Land Management (BLM) could achieve this by developing regional and cross-boundary collaboratives to facilitate cooperation on

ecosystem-level land management challenges and water source protection. Federal land management agencies should consider investing in facilitation capacity and training for agency personnel and partner organizations involved with collaboratives.

5. Western Governors support improvements to interagency communication, fire response capability, and coordination, including the sharing of firefighting resources. Fire management activities should support fire prevention, rapid response capabilities, full suppression strategies where appropriate and management of wildfire for resource benefits. Local government and volunteer fire associations play a critical role in wildfire response and mitigation, and state and federal agencies should look for ways to further incorporate these groups into regional wildfire dispatch and coordination centers. Additionally, it is critical that improvements are made to simplify the fire billing adjudication process to ensure more timely reimbursements in line with agreement standards.
6. Federal agencies should examine funding match requirements and consider reducing or eliminating these requirements when the public benefit outweighs the cost of the funding match. Federal agencies are encouraged to work with western states to ensure that communities' access to these grants is as efficient and streamlined as possible.
7. Federal agencies should facilitate the participation of state, local, and tribal governments in federal decision making by dedicating staff to develop and provide technical assistance and enhance communications across local, tribal, state, and federal partners. Federal agencies should also take steps to assist resource-constrained communities in developing needed capacities such as grant writing or conducting environmental analyses.
8. States may be the conveners of collaborative interagency forest and rangeland management efforts, such as in the case of Good Neighbor Agreements. When this occurs, federal agencies should provide funding and support to states for the cost incurred during any convening role. Congress and federal agencies should also provide opportunities for expanded cooperation, particularly where states are working to help their federal partners to improve management of federal lands through the contribution of state expertise and resources.
9. Effective forest and rangeland management requires a network of forest and rangeland infrastructure to manage, maintain, and restore western forests and rangelands. Federal and state agencies should strive to find ways to support and expand critical forest and rangeland management infrastructure, including mills, biomass facilities, livestock watering systems, and roads. Federal agencies should also examine the need for market incentives to encourage sustainable nursery markets and facilitate the development of additional nursery capacity. The federal government should take steps to address equipment shortages as part of its implementation of the Infrastructure Investment and Jobs Act (IIJA).
10. Federal and state agencies should look for ways to grow the workforce needed to support and operate forest and rangeland management infrastructure. These agencies should explore the expanded use of youth, veterans, inmate crews, and conservation corps to provide cost-effective capacity to support forest and rangeland restoration. The federal government and employers should also consider work experience and other non-traditional credentials in hiring to ensure adequate capacity for land management project implementation. The federal government, states, and territories should examine standards on hiring persons with criminal backgrounds to promote employment opportunities for qualified applicants that present

minimal risk for future criminal behavior. The federal government should focus attention on housing needs and assist communities seeking to attract and retain workforce.

11. Western Governors support the expansion of restoration projects in forest and rangelands, including repair or removal of culverts and other barriers to fish passage. Federal and state agencies should strive to find ways to support and expand cost-effective means of supplying restoration projects, such as with large woody material from adjacent overstocked forests, which in turn supports the rural workforce needed to implement large-scale watershed and stream restoration efforts.
12. A thriving forest products industry is essential to support critical forest management infrastructure. Western Governors support the expansion of markets for forest products. Federal agencies should expand opportunities and incentives for existing USDA, Economic Development Administration, and Small Business Administration programs and financing to support forest products business development and infrastructure. USFS Research and Development, State and Private Forestry, and National Forest System should work collaboratively to support existing and emerging forest products technologies, including the work of the National Forest Products Laboratory, with the goal of expanding markets to maximize restoration activity.
13. Congress should pass legislation to promote forest and rangeland product markets and technologies and expand funding for the Community Wood Energy Program. Federal agencies are encouraged to continue research and development efforts to find viable markets for low-value biomass and prioritize the utilization of low-value biomass for thermal, electric, and liquid-fuel energy. Rural electric cooperatives, public utilities, community facility managers, and other partners should contribute to the research, testing and deployment of new and modified heat and electric generation projects and liquid-fuel facilities from hazardous fuels reduction, conifer removal, and other forest and rangeland restoration efforts.
14. Federal land managers should work to ensure that forest products producers have increased certainty of supply, as well as a broader suite of outlets, in addition to traditional sawmills and existing biomass facilities. States can also work with USFS and other federal land managers to establish more long-term stewardship agreements to ensure a long-term feedstock supply. Federal resources and partnerships should support efforts beyond federal lands given the critical role of cross-boundary work.
15. Authorities granted in past Farm Bills such as Good Neighbor Authority (GNA) and Stewardship Contracting Authority (SCA) are powerful tools to boost forest and rangeland management, promote collaboration, and limit the effects of administrative objections and litigation. Congress should extend both authorities to all federal land management agencies and authorize those entities to increase the flexibility of GNA and SCA. Federal agencies should modify GNA guidance for all eligible partners to allow 20-year contracts, retention of timber sale revenue, a broader set of authorized restoration services, and the expenditure of project revenue on non-federal lands.
16. Western Governors believe clear, coordinated, and consistent application of federal vegetation management practices is integral to maintaining the health of western forests, preventing dangerous and damaging wildfires, and maintaining grid reliability. The Governors support effective and efficient cross-jurisdictional coordination that enables utilities to undertake necessary vegetation management actions on federal transmission rights-of-way.

17. Congress should direct funding to the Joint Chiefs Landscape Restoration Program to facilitate continued partnership and investment between USFS, the Natural Resources Conservation Service, and state foresters to support restoration projects.
18. The USFS business model can be improved by identifying business practice barriers to cross-boundary projects, developing training on state and federal contracting procedures, utilizing Service First authorities, streamlining and consolidating agency processes with partners, and establishing multi-agency pilot projects, which can suggest models for subsequent formal agreement.
19. Western Governors encourage effective deployment of IIA programs, including programs that provide incentives to purchase equipment, participate in new processes, or expand markets to encourage deploying new conservation practices to aid in forest and soil health and restoration.
20. Western Governors support efforts to improve the effectiveness of the National Environmental Policy Act (NEPA) in a forest and rangeland management context, including the use of area-wide plans and specialized teams to bolster NEPA capacity. Federal agencies should engage with Governors and states in early, meaningful, and substantive consultation throughout the NEPA process. Western Governors support allowing federal agencies to analyze only the action and no-action alternatives when a project is collaboratively developed, unless a third alternative is proposed during scoping and meets the purpose and need of the project. Federal agencies should consider how interagency shared positions can create regulatory efficiencies and promote greater collaboration between federal, state, territorial, local, and tribal land managers.
21. State, tribal, and federal agencies should look to expand the training for and use of prescribed fire and should look for ways to reduce the statutory, regulatory, and economic barriers to its expanded use on western forests and rangelands.
22. Federal agencies seeking to deploy prescribed fire should work to educate the public about the utility and necessity of prescribed burns to increase cultural acceptance of the practice. Federal agencies should also coordinate with state air quality specialists on prescribed burns, put greater effort into coordinating prescribed fire with mechanical treatments; updating models, tools, and practices for safe burning; and putting a greater emphasis on post-burn preparation. State and federal air quality specialists should work together to identify reforms that reduce barriers to prescribed fire, reduce overall health impacts from smoke, improve interagency use of smoke management best practices, and examine liability protection for fire managers and compensation for private property owners negatively affected by escaped prescribed burns.
23. Land managers across the West should strive to increase workforce capacity for science-based vegetation management activities, oversight, and planning.
24. Traditional Native American cultural burning and tribal ecological knowledge and practices can contribute significantly to improved forest management in the West and should be incorporated more effectively into federal and state planning management processes.

25. Western Governors support efforts to improve a broad range of pre-fire mitigation practices. State and federal agencies should work to develop tools to support mechanical hazardous fuels reduction, especially the removal of underbrush and understory, which are economically unviable in many instances. Land managers should work to further integrate invasive species data and management practices into hazard fuels management and planning.
26. The federal government should consider additional steps to recruit and retain an effective land management and wildland firefighting workforce, including dispatchers. Federal agencies should examine their reliance on 1039 seasonal staff, shift a higher percentage of wildland fire staff from seasonal to permanent and permanent subject to furlough positions, evaluate policies related to the use of Administratively Determined emergency firefighters, and authorize hazard pay for federal firefighters performing prescribed fire operations.
27. Agencies and stakeholders should continue to seek opportunities, including revisions to forest plans, to enhance safety and reduce costs in suppression decisions while protecting communities. Incentives should be created for local governments to take voluntary actions to support the creation and expansion of fire-adapted and smoke-ready communities, including the promotion of education, fuels management projects, and improved integration of community wildfire protection plans with land use decisions when compatible with local goals. Federal land managers are encouraged to make shared wildfire risk mitigation systems (SWRM) and similar tools widely available to communities and decisionmakers.
28. Western Governors support increased attention to the challenges posed in post-wildfire landscapes and wildfire-affected communities. Federal agencies should collaborate with states to designate and train post-fire coordinators to manage post-fire recovery. Doing so would encourage better awareness of post-wildfire restoration funding opportunities available to wildfire-affected communities and more sophisticated coordination of restoration activities to achieve restoration objectives. Land managers should prioritize post-wildfire water quality effects in mitigation planning and execution.
29. Increasing the pace and scale of restoration work like prescribed fire, fuels reduction, active management, and reforestation can help reduce the effects of climate change. Western Governors support the creation and expansion of technical and financial assistance to landowners for carbon sequestration and conservation activities on forests and rangelands. Land managers should integrate small private landowners into ecosystem planning processes and responsible land management practices; additional methods of gaining small landowner participation and engagement should also be explored.
30. Federal agencies need to ensure adequate monitoring, assessment, and analysis of federal forests and rangelands, including data on wildlife, water, soil, and forage. States, territories, and federal agencies are encouraged to consider standardizing and simplifying data collection protocols for federal agencies, states, counties, and tribes which include robust landowner privacy standards and protections. Federal agencies should strive to further improve the collection of socioeconomic data related to forest and rangeland management decisions, and to further incorporate that data into management decisions.
31. The Administration should provide federal funding to develop detailed state rangeland action plans addressing invasive species, wildlife and fish habitat, and water quality and quantity as a complement to State Forest Plans. These rangeland plans should include resource analyses of

soil health, water, plants, animals, and productive capacities to inform management decision-making.

32. Western Governors urge Congress and the Administration to support the research needed for responsible and effective forest and rangeland management in the West. Federal agencies conducting research should also work to ensure that public research projects are focused on research that supports on the ground management needs. Western Governors urge Congress and the Administration to support USFS Research Stations, which play a key role in forest and rangeland management in the West.
33. Federal agencies are encouraged to include cost metrics such as the avoided cost of uncharacteristic wildfire, smoke effects on populations, excessive carbon emissions, and damage to water supply systems and downstream communities when assessing the merits of mitigation projects.
34. The outbreak of the COVID virus in 2020 posed a significant challenge to those working to manage the West's forests and rangelands, particularly wildland firefighters. State, federal, and local wildland fire managers should be encouraged to learn from the pandemic response and, as appropriate, implement effective new management principles developed during that pandemic into permanent practice. Efforts should be made to ensure that emergency response personnel are prepared for similar situations in the future, as well as other potential risks.
35. Mature and old growth forest characteristics should be considered when actively managing forest ecosystems but should not impede the ability to actively manage and restore forest ecosystems. Ecosystem resiliency is, in part, dependent on having a range of various tree age classifications within a forested ecosystem. Mapping tools should be used generically to identify where mature and old growth forests may be present and management actions should be based on locally verified ecosystem resiliency factors and ground truthing.
36. Western Governors support the continued responsible use of federal lands for grazing and increased funding for grazing management, monitoring, and permit condition compliance. Repairing and replacing range improvements, particularly fencing, in a timely manner should be a priority for federal land management agencies in wildfire-affected areas.
37. We support sound, science-based management decisions for federal lands – including adaptive management – and believe these decisions should be based upon flexible policies that take into account local ecological conditions and state planning decisions for fish and wildlife and other human needs.
38. Federal and state land managers should identify opportunities to improve flexibility and integration of grazing management and targeted grazing as tools to achieve restoration and land management goals, including fish and wildlife habitat improvements, drought and wildfire mitigation and resilience, water quality and watershed health, soil health management, promotion of perennial plant health, and control of invasive species such as cheatgrass. They should also promote grazing allotment flexibility on federal lands, within USFS and BLM permitting systems and across ownership boundaries, to respond to changing rangeland conditions and environmental considerations. Western Governors also encourage measures of successful grazing be based in ecological outcomes showing upward trends.

39. Livestock grazing on federal lands is compatible with recreation and wildlife management and fulfills the multiple use and sustained yield mission of both the USFS and BLM. Policies, analyses, or planning decisions that lead to closing allotments must be based on science, documented threats, and causal factors consistent with state policies and programs as well as federal multiple use missions. It should also be taken into consideration that grazing suspensions and closures after wildfire allow for the onset of invasive grasses causing a quicker fire return interval, which can exacerbate the threat of wildfire.
40. Decisions to reduce or suspend grazing should only be made when supported by an appropriate quantitative assessment of long- and short-term trends in rangeland conditions on specific allotments, risk of spread of invasive weeds, diseases to wildlife, or other documented fish or wildlife impacts. Forage use from wild ungulates should be assessed using rigorous quantitative methods when identifying the causal factors that affect range conditions, and those wild ungulates should be managed for their proportional impact. If after consultation with the state, the federal agency decides to reduce, suspend, close, or modify an allotment due to documented harmful wildlife impacts, an alternative allotment, properly authorized pursuant to NEPA, if a suitable alternative allotment exists, must be made available to the displaced operator prior to adjustment of the original allotment. In order to fully implement this policy, the BLM and USFS must have alternative allotments properly authorized under relevant planning documents. This ensures that suspensions or modification of grazing permits will not result in a net loss of Animal Unit Months and that appropriate alternative allotments are available.
41. Grazing permit renewal decisions should be assisted by current site-specific, quantitative data. Federal agencies should engage in meaningful consultation, coordination, and cooperation with livestock grazing permittees, state and local governments, tribes, and stakeholders, prior to initiation and throughout the entire permit renewal process.
42. Federal land management agencies' decisions to reduce or close allotments should only be based upon completion of a full administrative review and analysis, including a thorough review under the provisions of NEPA. The decision process must include opportunities for states, livestock grazing permittees, and other stakeholders to provide input. Allotments should not be closed due to a pending NEPA review without allowing authorized use of the allotment pending a final decision, or the use of an equivalent amount of forage at reasonably equivalent cost to compliant operators.
43. Federal rangeland specialists should have an understanding of the economics and management of ranching operations dependent upon federal lands and should receive the necessary training to comprehensively monitor rangelands, conduct objective analysis, and write sound environmental documents.
44. Clear directives and accountability throughout all levels of the USFS and BLM should be required so that interpretation and implementation is practical and predictable from office to office and individual to individual and informed by an understanding of localized rangeland and ecological conditions, and economic health of ranch operations. BLM should engage collaboratively with livestock grazing permittees when developing Annual Operating Instructions and aim to minimize economic burdens to permittees.
45. Federal land management agencies must give interested state agencies an opportunity to fully participate in or provide input to grazing permit actions – prior to their initiation – including

generalized review of livestock operations on federal lands, any assessment of grazing conditions as part of a federal planning process, review of past compliance of the operator with grazing allotment conditions, and individual allotment reviews. Grazing permit decisions should not be finalized until after this opportunity for meaningful consultation with the states, local governments, and the affected permittees.

46. Governors possess primary decision-making authority for management of state resources. States also have knowledge and experience that are necessary for the development of effective plans. Accordingly, it is essential that Governors have a substantive role in federal agencies' planning processes and an opportunity to review new, revised, or amended federal land management plans for consistency with existing state plans. Federal agencies should provide Governors with sufficient time for a complete state review of federal land management plans, especially when federal plans affect multiple planning areas or resources.
47. The federal government should be a responsible landowner and neighbor and should work diligently to improve the health of federal lands in the West. Federal actions or failures to act on federal lands affect adjacent state and privately-owned lands, as well as state-managed natural resources.
48. Congress and federal agencies should provide opportunities for expanded cooperation, particularly where states are working to help their federal partners to improve management of federal lands through the contribution of state expertise and resources.
49. Western Governors support efforts to examine rural communities' relationships with natural resources, such as forests, rangelands, croplands, wildlife, and source water, as well as the important role that rural communities play in the management of these resources. Policymakers in the West should be encouraged to identify barriers to growth and sustainability in western communities, including a lack of restoration infrastructure, disaster mitigation challenges, dependence upon a single natural resource, and issues related to local capacity, expertise, and funding, and identify best practices to help rural communities overcome these barriers.

C. GOVERNORS' MANAGEMENT DIRECTIVE

1. The Governors direct WGA staff to work with congressional committees of jurisdiction, the Executive Branch, and other entities, where appropriate, to achieve the objectives of this resolution.
2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

This resolution will expire in December 2026. Western Governors enact new policy resolutions and amend existing resolutions on a semiannual basis. Please consult <http://www.westgov.org/resolutions> for the most current copy of a resolution and a list of all current WGA policy resolutions.