

Implementation of EO 14308: Empowering Commonsense Wildfire Prevention and Response

On Monday, September 15th, both the Department of the Interior (DOI) and the U.S. Department of Agriculture (USDA) released further guidance on the implementation of the <u>Executive Order 14308</u> Empowering Commonsense Wildfire Prevention and Response (EO), issued on June 12th, 2025. <u>DOI Secretarial Order No. 3443</u> and <u>USDA Secretarial Memo 1078-017</u> provide important direction to the departments and relevant agencies on how they should undertake the implementation of the EO. You can read AWR's original analysis of the EO here.

One of the key components (and first deadlines) of the EO was the direction to consolidate wildland fire programs within DOI and USDA to the extent practicable and allowable by law. Instead of combining DOI and USDA programs, the documents lay out a pathway for "unification" of DOI fire programs and significant restructuring within the Forest Service. Important to note, the EO and accompanying secretarial direction are not the same as the vision for consolidation laid out in the President's Budget for the Department of the Interior. The President's budget called for the wholesale transfer of wildland fire functions from USDA to DOI. Further action by Congress would be required to enact the more sweeping changes proposed in that document.

Below you will find a complete crosswalk of the new guidance with relevant content from the Wildland Fire Mitigation and Management Commission reports, On Fire and the Aerial Equipment Strategy Report. Page numbers reference the report On Fire, unless otherwise noted. Recommendations are noted by number and short title. We encourage you to look at the report for full text.

Summary

AWR is encouraged to see a roadmap for change that addresses many of the same concrete challenges that were identified by the nonpartisan Wildland Fire Mitigation and Management Commission and that align with many of the principles that AWR articulated as critical to foster in the wildfire system. Specifically, both documents articulate the importance of partnerships with States, Tribes, and local governments and provide direction to improve timely reimbursements and frameworks for coordination. The direction also strongly aligns with many recent calls for modernization of the science, technology, and IT infrastructure of the wildfire system. The call for the creation of a Fire Intelligence Center appears to align with the Commission recommendations for what the body provisionally termed a "fire environment center." The documents also call for improved integration of research with practitioner needs. The emphasis on greater alignment of response and pre- and post-fire activities is reflected in the design principles offered by AWR, which call for a more proactive approach to risk reduction and post-fire recovery. Various provisions point the way to the workforce improvements called for by the Commission and AWR, including greater attention to firefighter health. Importantly, the documents lay out a pathway for critical

non-federal input to the system. AWR has urged the meaningful involvement of a broad array of non-federal partners from every facet of the wildfire system and is pleased to see pathways for input beginning to emerge.

In total, the secretarial direction is partially or wholly aligned with over a dozen recommendations of the Commission.

Operational Coordination and Response

Action	DOI	USDA	Timeline	Commission
Evaluate and restructure existing coordination and governance bodies to eliminate redundancy and misalignment, and to consolidate or establish new governance structures with clear authority, accountability, and annual performance standards.	X	X	120 days	"The Commission recognized that fragmented and often siloed approaches can create critical gaps and barriers and, in some cases, duplication of effort." (p. 240) "While the Commission was unable to reach consensus on the specific issue of consolidating wildfire response, the conversations highlighted the fundamental tension between coordination and consolidation as we rethink the needed roles and elements of a modernized approach to wildfire." (p. 240) "Member questions focused on whether administrative systems such as aviation management, human resources, information technology, and appropriations should be consolidated. Several members felt the current system of operations is not the system that would be designed if we were building it today and is, in fact, a product of an era we are unlikely to ever see again." (p. 240)
Qualification and training standardization, and skills crosswalks with the Department of Homeland Security, Tribes, states, and local governments.	X	X	180 days	"Federal wildland firefighters and nonfederal fire practitioners alike often struggle to gain access to the training, coursework, and practicum experience required under NWCG standards." (p. 118) "The Commission found that national coordination requires the support and participation of all relevant entities, from the local to the federal, to utilize all resources effectively." (p.106) See R54: access to training for partners

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Unified aircraft and pilot [policies], including inspection, carding, procurement, contracting, standards, and acceptance processes.	X	X	30 days	"The Commission recognizes that challenges of interoperability extend to aviation assets as well. All aircraft must be certified, or "carded," in order to participate in federal wildfire response, and the Commission heard of issues with the transferability and reciprocity of certifications and carding between state assets, federal assets, and military assets. As a result, it can be difficult to use military and state owned or contracted assets on federally managed fires." (p. 30 - Aviation Report)
Revise the Master Interagency Agreement for Wildland Fire Management to ensure consistent alignment in policy and program delivery across DOI and USFS.	X	X	120 days	While the Commission spoke to the need for cooperative compacts, they did not speak to a revision of the Master Agreement.
Revise the Master Cooperative Wildland Fire Management and Stafford Act Response Agreement template to simplify structure, streamline billing and reimbursement, and expedite review of new wildfire coordinating agreements. *Includes Joint DOI-USDA formal process to solicit from "key stakeholders"	X	X	120 days	"The Commission sees a need to create a more comprehensive, national approach to managing post-fire hazards and impacts across scales, between jurisdictional and land ownership boundaries, and among federal and non-federal entities." (p. 129) "Though post-fire resources are needed almost immediately, federal disaster response processes for assessing risks and allocating funds can take substantial time (Moloney et al., 2023). In some cases, federal assistance is available, but comes too late to be meaningful." (p. 130).
Begin establishment of joint USDA and DOI procurement, contracting, and payment centers to consolidate payment and auditing systems and accelerate reimbursement procedures	X	X	Propose a timeline within 90 days	"While the legal mechanisms exist to share response personnel and equipment across jurisdictions, the practice is functionally hindered by inconstant reimbursement rates and processes. Lack of adequate staffing within federal agencies can play a role in these delays, which are compounded by complications associated with review and adjudication of charges and variable rates, including true costs and allowable billables. These delays can deter local entities and

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(immediately remedying any wildfire-related backlog of reimbursement to non-federal partners); propose a timeline for implementation.			remedy of any backlog	Tribes from deploying resources to assist in response, as doing so risks straining their budgets and going into deficit for months or years until reimbursement is provided. Issues with untimely or insufficient reimbursements occur across agencies and have caused friction between federal and non-federal entities. " (p. 119)
*The immediate remedy of any wildfire-related reimbursement backlogs includes Joint DOI-USDA formal process to solicit from "key stakeholders"				The Commission did not identify a single best solution to this problem, and a one-size-fits-all approach may not be feasible or appropriate. However, there was agreement that any new reimbursement mechanism should be timely and streamlined, with a goal of rapid repayment. See R50: rapid reimbursements and A5: long-term aviation contracting
Initiate the modernization, consolidation, and simplification processes for grants, agreements, and assistance to increase accessibility, accelerate reimbursement, and eliminate administrative delays. *Includes Joint DOI-USDA formal process to solicit from "key"	X	X	Propose a timeline within 30 days	"As the scale of wildfire response, mitigation, and post-fire recovery needs grow, workforce expansion must include making better use of these existing non-federal workforces. Contracts, grants, and agreements are the main mechanisms used by federal agencies to work with other entities, making them a key focal point for potential improvement." (p. 175) See R90: improved contracts, grants, and agreements
Evaluate the efficiency and effectiveness of the current Geographic Area boundaries and pursue necessary modifications.	X	X	120 days	The Commission did not speak to the efficiency or effectiveness of existing Geographic Area boundaries.

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Initiate the consolidation and modernization of wildland fire Predictive Services at the national and regional levels into a centralized Fire Intelligence function.	X	X	Propose a timeline within 30 days	"The predictive modeling functions that are housed on the National Interagency Fire Center campus, while co-located, do not rise to the level of interorganizational (federal, Tribal, state, and local) coordination, nor do they fully integrate services across the pre-fire mitigation and post-fire recovery phases of an incident. They have also failed to keep pace with developing technology and research." (p.195) "Various predictive services and decision support functions currently exist to aid federal managers and decisionmakers in the wildland fire community. However, these services are fragmented across multiple agencies and suffer from both limited interoperability and dissipated priority-setting and purchasing power." (p. 194) See R104: Fire Environment Center establishment
Standardize wildland fire position descriptions and establish a joint Administratively Determined hiring program and pay plan.	X	X	180 days	"Commission discussions emphasized that a comprehensive, expanded, and sustainable workforce is a cornerstone of our ability to change our fire future. Without this robust workforce, many of the Commission's recommendations become far less feasible and may, in fact, become impossible." (p. 157) "Agencies also should consider efforts to align core competencies, performance standards, and hiring standards to enable greater interoperability between agencies. Greater alignment would also support skill-building for diverse positions within agencies, reward high performance, and promote career advancement." (p. 167) See R85: efficient hiring pathways
Unification of BIA, BLM, FWS, NPS, OWF, and OAS. *Includes formal process to solicit from "key stakeholders"	X		Plan in place by Oct. 31, 2025. Implement by Jan. 12, 2026.	The Commission did not address the unification of DOI fire programs. However, the Commission did find that urgent new approaches to wildfire management were critical. It is also worth noting that the Commission highlighted the fragmentation of several elements of the wildfire system during its discussions. Two of the areas where fragmentation was most frequently discussed included post-fire recovery and the science, data and technology issue areas.

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Establish a USWFS Fire Chief with relevant experience in wildland fire.	X		Promptly	The Commission did not speak to the establishment of such a position.
The newly appointed USWFS Fire Chief will as soon as practicable review the distribution of DOI fire response units and assets and protection responsibilities.	X		Promptly	"Despite imperfect data on the full composition of the wildfire risk reduction, response, and recovery workforce, the Commission found that a significantly larger workforce is essential to expand the scope and scale of wildfire mitigation, increase the use of beneficial fire, and to meet fire response, community preparedness, and post-fire recovery needs now and in the coming decades." (p. 160-161)
Develop proposals for a restructuring of the internal wildland fire organization, consolidating fire leadership that reports directly to, and is accountable to a Forest Service Deputy Chief.		X	April 1st, 2026	The Commission did not speak to the establishment of such a position.
Assess wildland fire staffing, organization, position descriptions, and job classifications to ensure consistency and develop recommendations for standardization across the agency.		Х	April 1st, 2026	"Commission discussions emphasized that a comprehensive, expanded, and sustainable workforce is a cornerstone of our ability to change our fire future. Without this robust workforce, many of the Commission's recommendations become far less feasible and may, in fact, become impossible." (p. 157) "Agencies also should consider efforts to align core competencies, performance standards, and hiring standards to enable greater interoperability between agencies. Greater alignment would also support skill-building for diverse positions within agencies, reward high performance, and promote career advancement." (p. 167) See R85: efficient hiring pathways

Research and Technology

Action	DOI	USDA	Timeline	Commission
Establish a joint governance structure to coordinate wildfire-related research, technology deployment , including new solutions in early fire detection, and IT modernization and integration across the Federal wildfire community.	X	X	60 days	"Because research functions are so widespread, it is difficult to capture a holistic picture of the gaps and needs." (p. 203) "[R]esearch, applied science programs, data management, and technology procurement and application related to wildfire are housed within a wide array of federal entities and academia, leading to a limited ability to set priorities, and general inefficiency." (p. 193) See R110: wildfire research coordination
Conduct a joint review of wildfire research portfolios to identify duplication [of research] and ensure alignment to support operational priorities, and firefighter and public safety.	Х	Х	120 days	"The Commission feels strongly that research efforts related to wildfire science and associated efforts should be driven by practitioner needs and ultimately be presented in such a way so as to be useful and accessible to practitioners." (p. 210) See R116: improved research-to operations
Assess and make recommendations to modernize standards for Personal Protective Equipment to ensure the long-term health and safety of wildland firefighters.	X	X	270 days	"Unlike structural firefighters, wildland firefighters do not wear personal protective equipment to reduce smoke exposure due to the challenging and dynamic environment in which they work. In fact, no such personal protective equipment is approved for use in this environment." (p. 184) "Additional research is sorely needed in this space, with critical areas of focus including: Personal protective equipment to protect against hazards from both the natural and built environment as well as physiological effects of this equipment." (p.184) See R98: workforce health research

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Initiate design of a unified Wildfire Enterprise IT architecture with secure, interoperable systems accessible to Federal, Tribal, State, and academic partners.	X	X	Propose a timeline within 60 days	"This [distributed] structure also results in the dispersed adoption of technologies and data systems across not just federal entities, but those at Tribal, state, and local scales as well, creating issues with interoperability." (p. 193) "The center's development of decision-support tools and services would be founded in a common operating environment (i.e., information technology infrastructure providing users easy access for the input and output of data) that would enable the aggregation, synthesis, and operationalization of data from across agencies and jurisdictions and including both fire response information and other relevant data." (p. 198) See R106: common operating environment

Pre- and Post-fire Activities

Action	DOI	USDA	Timeline	Commission
Utilize a unified wildfire risk mapping tool to plan mitigation activities and demonstrate wildfire risk reduction accomplishments across Federal, Tribal, State, local, and private lands.	X	X	Propose a timeline within 30 days	"The Commission found that federal policies and practices should be guided by improved performance measures focused on creating resilience in both communities and the natural environment." (p. 252) "There is a need to evaluate what data and tools are available to state, local and federal governments, how they are being used, and how they can be expanded, revised, or better integrated for greater efficacy." (p. 45) See R147: land management performance metrics
Establish a 5-year emergency stabilization and rehabilitation framework including recommended consistent appropriations language and shared authorities.	X	Х	270 days	"The task of addressing post-fire impacts falls to a multitude of agencies and governments, each with unique jurisdictions, authorities, resources, and internal policies, incentives, and practices, yet the Commission found no consistent formal process to look at the overall picture of hazards and recovery. Part of the challenge experienced in the post-fire period is that the recovery of ecosystems

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				and communities are fundamentally linked, but the approach is fragmented." (p. 127) "The Commission found the transition from wildfire response to management of
				post-fire hazards and long-term recovery is fragmented between multiple entities and across multiple scales. During this transition period, individuals, and local partners, with varying support from states, navigate what is a complex network of recovery programs and associated authorities, jurisdictions, and eligibility requirements." (p. 129)
				See R60: organizational and financial post-fire structures
Update standards, processes, and policies to streamline permitting for bulk-power operations and maintenance on Federal rights-of-way and associated lands.	X	X	270 days	"Federal land management agencies each have different processes, timelines, and requirements for management of transmission corridors across the lands they administer." (p. 51)
				"There should be consistent implementation of a common set of rules and operational processes, including permitting approvals and timelines, across federal agencies for both regular and emergency work in the electric transmission rights-of-way." (p. 52)
				See R8: consistent processes for utility rights-of-way
Work with USFS and the Environmental Protection Agency to eliminate regulatory barriers for prescribed fire and the use of fire retardant, including revising the exceptional events rule, and permitting requirements.	X	X	270 days	"Despite the ecological and cultural benefits and a strong record of success, the ability to undertake prescribed and cultural burning faces numerous challenges and will require engagement by multiple sectors of society." (p. 56)
				"[A]t the same time that human health impacts from smoke are a critical – and worsening – problem, the Commission continues to validate the essential need for increased use of beneficial fire. Specifically, the Commission believes increasing the application of beneficial fire will support risk mitigation of future smoke emissions from wildfire events." (p. 93-94)
				"[T]he Commission believes that with sustained investment and increased cooperation, federal agencies, Tribes, and state and local agencies can work

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				together under existing laws to clarify and align regulations, policy, and practice to promote these mutual objectives." (p. 94) "The intent of an expeditious evaluation of federal regulations, their implementation, and guidance called for in this recommendation should be to determine the barriers and challenges of the current processes, including the Exceptional Events Rule, and then to undertake efforts to address the identified issues to ensure programmatic and procedural ease." (p. 99) The Commission did not, however, speak to the use of fire retardant. See R42: smoke exceptional events
USDA's General Counsel will coordinate with the DOI Solicitor's Office regarding post-fire litigation activities, as appropriate, to effectuate the goals identified in the EO 14308.	X	X	Immediate	The goal of this directive, outside of increased coordination related to post-fire litigation, is unclear. The only reference to litigation within the EO itself comes within EO Sec. 4(e): "The Attorney General, in consultation with the Secretary of Agriculture and the Secretary of the Interior, shall review pending and proposed wildfire-related litigation involving electrical utility companies to ensure the Department's positions and proposed resolutions in such matters advance the wildfire prevention and mitigation efforts identified in this order."
Ensure that the Department's Solicitor's Office confirms the Department's positions and proposed resolutions in wildfire litigation matters advance the wildfire prevention and mitigation efforts identified in the EO. As consistent with applicable law, settlements shall mandate and permit the settlors to engage in best practices to reduce the risk of wildfire ignition from the bulk-power system.	X		Immediate	"There should be consistent implementation of a common set of rules and operational processes, including permitting approvals and timelines, across federal agencies for both regular and emergency work in the electric transmission rights-of-way." (p. 52) See R8: consistent processes for utility rights-of-way

Opportunity for Input

A formal process to solicit from "key stakeholders" was identified in the memos in several places (as indicated in the table above). These opportunities for input include:

- [Revision of agreement templates] Revision of the Master Cooperative Wildland Fire Management and Stafford Act Response Agreement template to simplify structure, streamline billing and reimbursement, and expedite review of new wildfire coordinating agreements [120 days].
- [Improve grants & agreements] Initiate the modernization, consolidation, and simplification processes for grants, agreements, and assistance to increase accessibility, accelerate reimbursement, and eliminate administrative delays; propose a timeline for implementation [30 days].
- [Reimbursements] Identify and promptly remedy any backlog of reimbursement to any State, local government, or Tribal partner related to past wildfire-related activities [no timeline].
- [Unification of DOI] In developing the plan, the Deputy Secretary, in coordination with the Assistant Secretary for Policy, Management and Budget, shall consider outside input when formulating the best and most effective strategy for unification, including from State, Tribal, and local partners with relevant wildfire experience.

Implementation

- USDA: NRE Undersecretary or Deputy, or USFS Chief
- DOI: Assistant Secretary Policy, Management and Budget (in coordination with Deputy Secretary and Assistant Secretaries)