

U.S. Department of the Interior Wildland Fire Program Unification Tribal Consultation Report

Executive Summary

Tribal Nations recognize the Administration's efforts to modernize wildland fire management in response to increasing wildfire threats. As sovereign nations with inherent rights to oversee their ancestral lands, many Tribes view the unification as a vital opportunity to better protect trust assets, incorporate Indigenous knowledge, strengthen tribal capacity, and promote fair resource distribution.

Across all letters and meeting transcripts, Tribal Nations and Tribal consortia broadly support improving wildfire management and streamlining operations if, and only if, the new U.S. Wildland Fire Service (USWFS) is designed and implemented with Tribes, not for Tribes. Core expectations include:

- Explicit protection of sovereignty, treaty rights and federal trust responsibility
- Meaningful, early, and continuing engagement and government-to-government consultations throughout implementation
- Preservation and expansion of P.L. 93-638 contracting/compacting authority across suppression, fuels management and post-fire recovery
- Funding parity, streamlined reimbursement process and clearance of suppression payment backlogs
- Maintaining Indian Preference and culturally informed workforce development pipelines through Tribal colleges and apprenticeships
- Integration of Indigenous knowledge into planning, operations, and post-fire recovery
- Data sovereignty protection and IT interoperability for Tribal programs
- Maintaining local presence and capacity to avoid delayed wildfire response and program operations throughout the transition

Background and Context

The Department of the Interior (Interior) initiated government-to-government consultations with Tribal Nations to discuss the unification of its wildland fire programs as directed by Secretarial Order (SO) 3443, "Elevating and Unifying the Department of the Interior's Wildland Fire Management Program," and Executive Order 14308, "Empowering Commonsense Wildfire Prevention and Response." These directives aim to unify and strengthen Interior's wildfire

management capabilities across more than 500 million acres of public and Tribal lands, improve operational efficiency, and promote proactive, locally informed strategies for wildfire prevention and response.

These consultations were jointly hosted by Acting Assistant Secretary for Policy, Management and Budget, Michael Boren and Principal Deputy Assistant Secretary for Indian Affairs, Janel Broderick. Four sessions were held in November 2025—two virtual (November 10 and 17) and two in-person (Albuquerque, NM on November 13 and Seattle, WA on November 19). The sessions engaged over 240 Tribal leaders and staff, representing more than 80 Tribes. The comment period closed on December 19, 2025, with 23 formal comment letters received from Tribal governments and organizations.

Each consultation session provided an overview of the purpose and intent of unification, drivers for change, objectives, and implementation phases. Key topics included Tribal integration, functional support, and opportunities for elevating Tribal fire programs. A central proposal discussed was the establishment of an Office of Tribal Trust (OTT), designed to strengthen Interior’s structural commitment to Tribal sovereignty and enhance engagement, coordination, and accountability. Additional measures under consideration included establishing Indian Self-Determination and Education Assistance Act (ISDEAA) Specialist positions, Awarding Official Technical Representative (AOTR) duties, and Tribal Liaison functions at multiple levels to support direct funding and ISDEAA contract administration, technical assistance, and co-stewardship opportunities.

Tribes were invited to provide feedback on the essential services USWFS must provide to fulfill trust obligations, the adequacy of the proposed organizational structure at its topmost tier and communication framework, the application of Indian Preference within various USWFS positions, and any unique Tribal or geographic considerations that would inform planning and operations. This report summarizes Tribal perspectives shared during these initial consultations and highlights the priorities, concerns, and recommendations that will guide the USWFS in building and refining a unified, responsive, and inclusive wildland fire management organization.

Core Concerns

Written comments were received from the Rocky Mountain Tribal Leaders Council; Mille Lacs Band of Ojibwe; Confederated Salish and Kootenai Tribes; Southern Ute Indian Tribe; Intertribal Timber Council; Yankton Sioux Tribe; United South and Eastern Tribes Sovereignty Protection Fund; Yakama Nation; Confederated Tribes of the Umatilla Indian Reservation; Fond du Lac; Santa Ynez Band of Chumash Indians; Oglala Sioux Tribe; Navajo Nation; Karuk; Santa Clara Pueblo; Confederated Tribes of the Colville Reservation; Standing Rock Sioux Tribe; Pueblo of Tesuque; Tulalip Tribes; Confederated Tribes of Grand Ronde; Fort Belknap Indian Community; Cheyenne River Sioux Tribe; and the Great Plains Tribal Chairmen’s Association. Core concerns

were compiled from both written comments and comments given during the two in-person consultation sessions.

Sovereignty & Trust Responsibility

Tribal leadership and representatives emphasized that the establishment of the USWFS under SO 3443 must explicitly reaffirm treaty rights, federal trust responsibility and safeguard Tribal decision-making authority. Tribes noted that as a newly formed Office within Interior, the USWFS assumes federal trust responsibility, the legal and moral obligation of the Interior to protect Tribal lands, resources, and rights while honoring Tribal sovereignty. Tribes also relayed that wildland fire management affects millions of acres of Tribal and ceded lands, and decisions about funding, operations, and resource allocation must reflect this responsibility.

Many highlighted their extensive experience and history managing wildland fire programs under ISDEAA P.L. 93-638 contracts and compacts and called for equitable and direct funding access, workforce development support, and co-management and co-stewardship frameworks that incorporate local cultural knowledge and specificity.

Tribes urged the Interior to maintain ongoing consultation, strengthen Tribal capacity, and avoid centralized structures that could undermine self-determination which is a core operational premise of Tribal Sovereignty. It was also stressed that federal obligations include protecting and restoring Tribal lands and resources, and that organizational charts should clearly identify positions responsible for Tribal coordination at all levels, with sufficient authority to influence resource allocation and operational decisions. Several Tribal Nations reminded the Interior that land cessions, in the form of treaties with the United States, were agreed to with assurances that Tribal rights and interests would be respected in perpetuity, underscoring the need for clear structural and operational commitments that honor these obligations.

Recommendations:

- **Reaffirm Treaty and Trust Responsibilities:** Tribes insist that USWFS must explicitly uphold treaty obligations and protect Tribal decision-making authority.
- **Support Self-Determination:** Avoid centralized structures that undermine Tribal sovereignty; strengthen Tribal capacity through equitable funding and workforce development.
- **Integrate Indigenous Knowledge:** Co-management frameworks should incorporate Traditional Ecological Knowledge (TEK) alongside federal practices.
- **Ensure Ongoing Consultation:** Continuous engagement and meaningful government-to-government consultation are essential throughout implementation.

- **Clear Organizational Accountability:** Positions responsible for Tribal coordination must be identified at all levels and empowered to influence resource allocation and operations.
- **Honor Historic Commitments:** Tribes emphasized that land cessions were made with assurances of perpetual respect for Tribal rights and interests.

Strong Opposition to Unification: The Oglala Sioux Tribe, Standing Rock Sioux, Tulalip Tribe, and Fort Belknap Indian Community all submitted letters opposing unification, citing inadequate consultation, concerns about impacts to treaty rights and trust responsibilities, and lack of transparency on Geographic Area (GA) boundaries and operational impacts. Postponement was recommended until a comprehensive plan is shared along with a Tribal impact assessment, regional consultation is held, and Tribal feedback is fully incorporated.

Meaningful Consultation, Communication & Transparency

Tribal leaders and representatives expressed persistent concerns about the pace and structure of consultations, citing minimal notice (particularly during a government shutdown), rushed timelines, limited materials, insufficient pre-decisional engagement with program and field staff, and poor geographic area distribution of the in-person sessions. Several also expressed that the virtual consultation sessions are merely webinars and do not constitute true government-to-government consultation. Tribes strongly called for extended consultation periods and the provision of detailed resources, specifically organizational charts and staffing plans, proposed GA boundary maps, the Implementation Blueprint, and the consultation presentation.

Tribes emphasized the need for early, in-person, regionally dispersed consultations with decision-makers and in full compliance with Interior's consultation policy. Several Tribes noted that their own consultation protocols must be acknowledged, and that a clear and defined communication protocol needs to be established for the USWFS. Nearly all requested additional government-to-government consultations or sessions held within their regions.

While many Tribes recognized the initial consultation as a very high-level overview of the unification, they still had many remaining questions and anticipate more will follow as the USWFS evolves. Tribes requested further engagement and consultation on critical topics such as GA boundary adjustments, organizational chart development particularly within their GA, revisions to manuals, and master cooperative agreements as well as other organizational milestones such as announcement of the USWFS Director and other key staff. Additionally, some Tribes expressed interest in consultations related to concerns specific to their Tribe or region, including local dispatch centers, ordering priorities, and potential impacts on Tribal aviation contracts, access to aircraft, procurement authorities, and response timelines. Several Tribes

recommended the establishment of an advisory board or committee, one that seeks to embed and maintain Tribal involvement in wildfire governance either through formal agreements or advisory structures with the goal of integrating Tribal leadership and perspectives into planning, response, and recovery, ensuring an inclusive, collaborative service that respects Tribal sovereignty.

Recommendations:

- **Extended and Early Consultation:** Tribes request longer timelines and early, in-person engagement with program managers and leadership before key decisions are made.
- **Comprehensive Materials:** Tribes want access to detailed resources such as proposed GA boundary maps, the Implementation Blueprint, and the consultation presentation.
- **Policy Compliance:** Interior must adhere to its consultation policy and recognize Tribal-specific consultation protocols.
- **Clear Communication Protocols:** Establish transparent and consistent communication and engagement processes for all phases of implementation.
- **Regional and One-on-One Engagement:** Many Tribes prefer government-to-government consultations within their regions or individually.
- **Engagement on Key Operational Areas:** Tribes seek communication and input on boundary adjustments and organizational structures that affect them, including cooperative agreements and operational systems such as dispatch, aviation procurement, and ordering priorities.
- **Tribal Integration:** Establish a wildfire governance framework that embeds sustained Tribal involvement through mechanisms such as formal agreements, advisory structures, and leadership representation to ensure Tribal perspectives shape planning, response, and recovery at every level within the USWFS.

Protect & Expand ISDEAA P.L. 93-638 Contracting and Cooperative Agreements

Tribes consistently emphasized that ISDEAA Public Law 93-638 contracting is central to Tribal self-determination and must be protected and expanded within the design of the USWFS. It was strongly stressed that these agreements with Tribal Nations are not standard government contracts but binding legal instruments that operationalize sovereignty, enabling Tribes to manage fire and natural resource programs in ways that reflect cultural values, environmental priorities, and community needs.

Tribes urged that the USWFS strengthen, and not complicate, contracting pathways across suppression, fuels management, planning, and post-wildfire recovery. Additionally, cooperative agreements should be streamlined to reduce administrative burden without infringing on Tribal authority. Existing agreements should be honored through their current terms, and multiple Tribes requested written assurances of continued support from the Bureau of Indian Affairs (BIA) and that the USWFS plans to build ISDEAA P.L. 93-638 capacity internally. Comments also called for direct Tribal participation in budget formulation. Tribes further emphasized that Interior's responsibility is to manage trust lands in the interests of Tribes, not the reverse.

Recommendations:

- **Build Internal P.L. 93-638 Capacity:** Tribes view P.L. 93-638 contracting as central to Self-Determination and expect its protection, expansion and functionality within USWFS. Tribes request formal plans to develop contracting capacity within the USWFS.
- **Strengthen, Not Complicate, Pathways:** USWFS should simplify contracting processes across suppression, fuels management, planning, and post-wildfire recovery and reduce administrative burden on Tribes.
- **Honor Existing Agreements:** Current agreements must remain in effect through their terms, with written assurances of continued support from BIA and USWFS.
- **Direct Tribal Role in Budget Formulation:** Tribes seek active participation in budget planning and decision-making.

Funding Equity, Direct Access and Timely Reimbursements

Tribes expressed significant concerns regarding funding equity, direct access to resources, and timely reimbursements under the proposed USWFS structure. Historic underfunding, outdated allocation formulas, and persistent reimbursement delays have driven strong calls for dedicated Tribal line items and streamlined payment processes. While several supported centralizing budget functions to streamline efficiency, many raised questions about transparency and Tribal input in allocation decisions, prompting recommendations for formal mechanisms that allow Tribal representatives to co-develop funding formulas based on unique fire regimes and cultural burning practices and priorities.

Tribes requested clarity on timelines and processes for reconciling existing invoice backlogs mentioned in SO 3443, identifying points of contact during the transition, and establishing payment centers, along with interim improvements to reimbursement systems. Additionally, Tribes sought confirmation that funding authorities and agreements under the ISDEAA P.L. 93-638 will be preserved and strengthened, including guarantees of stable, long-term base funding. Ensuring full funding for Tribal fire management programs, including preparedness, fuels, and post-fire, was emphasized as critical to preventing catastrophic wildfires and supporting proactive and wholistic management strategies.

Recommendations:

- **Address Historic Underfunding:** Tribes demand equitable funding and updated formulas that reflect unique fire regimes and priorities.
- **Dedicated Tribal Line Items:** Establish clear, direct funding streams for Tribal programs within USWFS budgets.
- **Streamlined Reimbursement Processes:** Resolve invoice backlogs, improve payment timelines, and provide clear points of contact during transition.
- **Transparency in Budget Decisions:** Create formal mechanisms for Tribal input in allocation and formula development.
- **Preserve ISDEAA Authorities:** Confirm that existing funding authorities and agreements will remain intact and be strengthened under USWFS.
- **Guarantee Stable Base Funding:** Ensure long-term, predictable funding for Tribal preparedness, fuels and post-wildfire recovery programs.
- **Prioritize Prevention Strategies:** Fully fund Tribal programs to support proactive mitigation and reduce catastrophic wildfire risk.

Office of Tribal Trust (OTT)

Many Tribes expressed strong support for the creation of an Office of Tribal Trust (OTT) as a critical mechanism for fulfilling federal trust responsibilities, provided it is established with clear authority, budgetary power, and full integration across all divisions within the USWFS to prevent siloing Tribal concerns. Tribes emphasized that the OTT must report directly to the USWFS Director and include decision-makers with whom Tribal leadership have a direct link. Early staffing of the OTT is essential so it can influence the development of other USWFS components during implementation and transition. The office must lead continued Tribal engagement and government-to-government consultation, facilitate co-stewardship agreements and opportunities, and oversee development of ISDEAA contract capability within the USWFS, ensuring treaty rights and sovereignty are safeguarded.

While Tribes welcomed the idea that all USWFS personnel will act as Tribal advocates, they cautioned that a national office must complement, not replace, regional and local staff who maintain day-to-day relationships. This approach would provide consistency and oversight while keeping engagement close to the ground. Finally, Tribes stressed that the OTT's role and the principle of trust responsibility must be embedded in policy and operational decision-making, not treated as an advisory function.

Recommendations:

- **Strong Support for OTT:** Tribes endorse the office if it has clear authority, budget power, and integration across all USWFS divisions.
- **Direct Reporting and Early Staffing:** OTT should report to the USWFS Director and be staffed early to influence transition decisions.
- **Core Responsibilities:** Lead consultation, co-stewardship agreements, and develop ISDEAA contract capability to uphold sovereignty and treaty rights.
- **Integrated Model:** National OTT must educate and work alongside regional and local staff to maintain relationships and support effective engagement and prevent siloing Tribal concerns.
- **Embed Trust Responsibility in Policy:** OTT's role must be institutionalized in governance and operations, not treated as an advisory function.

Indian Preference

Tribal leaders and representatives strongly advocated for Indian Preference to be included in USWFS roles and organizational tiers, particularly for positions serving Indian Country or working with Tribal leaders and organizations on a regular basis. Some Tribes went further and stated Indian Preference should be applied across all positions within the USWFS. Several emphasized that Indian Preference is a political classification rooted in the government-to-government relationship, not a racial designation. For roles directly supporting Tribal lands or communities, priority should be given to candidates who understand Tribal sovereignty, culture, and local land management practices.

Recommendations:

- **Strong Indian Preference:** Apply Indian Preference across USWFS roles serving Tribal lands and communities.
- **Political Classification:** Indian Preference reflects a government-to-government relationship, not race-based hiring.
- **Enhanced Priority for Tribal Expertise:** Positions tied to Tribal lands should prioritize candidates with cultural and sovereignty knowledge.

USWFS Mission

Several comments were received requesting Tribal engagement in developing and defining the mission of the USWFS, one that does not focus on wildfire suppression but emphasizes the importance and effectiveness of proactive mitigation and management. It was stressed that Federal obligations must remain explicit and enforceable and the mission of the USWFS must incorporate and clearly state its Trust Responsibility to Tribal Nations. One Tribe also

emphasized that performance measures for key leadership positions within the USWFS should explicitly include language affirming the fundamental responsibility to uphold the federal trust obligation and support tribal sovereignty.

Recommendations:

- **Tribal Inclusion:** Tribes want active engagement in shaping the development and refinement of the USWFS, including its mission.
- **Broadened Focus:** The mission should emphasize proactive mitigations and fuels management rather than primarily suppression operations.
- **Trust Responsibility Integration:** Incorporating and affirming the federal trust responsibility to Tribal Nations is essential to the mission's foundation.

Operational Continuity & Local Capacity

Tribes raised significant concerns about maintaining operational continuity and local capacity as the USWFS structure is implemented. Many expressed alarm that centralization could eliminate local BIA fire staff and weaken rapid response capabilities. Tribes stressed the need to preserve a strong local presence, maintain dispatch autonomy, and ensure equitable access to national resources. Some also emphasized the importance of retaining the ability to host non-Tribal or national resources such as hotshot crews, fire use modules, helicopters, air tankers, air attack platforms, and engines.

Several commented that the USWFS should adopt an “all hands, all lands” approach year-round, enabling personnel to work across jurisdictional boundaries for suppression, fuels management, and post-fire recovery. Many Tribes had questions and concerns about the ability to order resources, influence prioritization, and access dispatch systems under any new structure. Finally, Tribes called for guaranteed technical assistance and capacity-building support, including training, equipment, and professional development opportunities for Tribal firefighters and fire managers.

Recommendations:

- **Preserve Local Presence:** Maintain local BIA fire staff and avoid centralization that undermines rapid response.
- **Dispatch Autonomy:** Tribes want continued access to dispatch systems and influence over resource prioritization.
- **Equitable Access to Resources:** Ensure Tribes can host federal resources such as hotshot crews, helicopters, and engines.
- **Year-Round, Cross-Boundary Operations:** Support “all hands, all lands” collaboration for suppression, fuels, and recovery work.

- **Capacity Building:** Guarantee technical assistance, training, equipment, and career development for Tribal fire programs.

Geographic Area (GA) Boundaries

Nearly all Tribes expressed concerns about GA boundaries, stating that little to no information has been made available. Tribes emphasized that any proposed GAs must be structured to maintain and strengthen existing relationships with Tribal governments rather than disrupt them. GA offices should be positioned to work closely with Tribes and supported by clear communication frameworks that include regular engagement opportunities, emergency protocols, and mechanisms for Tribes to raise concerns quickly. Many Tribes expressed concerns with current GAs having disjointed networks and stressed that boundaries should reflect ecological conditions, operational realities and Treaty/Trust Responsibility contexts rather than default political boundaries.

Multiple Tribes requested immediate involvement in finalizing GA boundaries to prevent fragmentation of multi-Tribal fire management networks and ensure that Tribal homelands are not inadvertently divided, which could complicate mobilization and resource sharing. Also included were requests to discuss how fire seasons, regional peak activity, and response times will be factored into GA design and national mobilization strategies.

Several Tribes also highlighted challenges unique to them, such as non-contiguous land bases and coordination complexities, as well as specific protection strategies for sacred sites and culturally significant resources. It was stressed that Tribal lands are not like any other federal lands and the cultural sensitivity and nuances must be understood. Additionally, Tribes urged inclusion in organizational charts and called for Tribal Liaisons with real authority and accountability to ensure meaningful inclusion in the USWFS.

Recommendations:

- **Maintain Regional Relationships:** GA offices must support existing Tribal partnerships, avoid disruption and establish clear lines of communication.
- **Finalize GA Boundaries with Tribal Input:** Boundaries should reflect ecology, unique values and complexities as well as treaty/trust contexts, not just political lines; prevent fragmentation of Tribal networks. Tribes want to provide input on how fire seasons, peak activity, and response times influence GA design and mobilization strategies.
- **Tribal Liaisons with Authority:** Liaisons must have decision-making power and accountability to Tribes.
- **Organizational Chart Inclusion:** Tribes seek visibility and representation in USWFS organizational structures.

Indigenous Knowledge Integration

Many Tribes strongly call for formal recognition of Indigenous knowledge as an essential and equal component of modern fire management. They emphasized that Indigenous fire stewardship practices are grounded in generations of ecological science and play a critical role in maintaining healthy, fire-adapted landscapes. The USWFS has an opportunity to institutionalize mechanisms for incorporating Traditional Ecological Knowledge (TEK) into planning and operations that respect Tribes as knowledge holders and co-managers, not merely stakeholders. Several Tribes requested the establishment of basic cultural burning protocols and the integration of these practices into Regional Fire Management Plans, including a dedicated Tribal consultation section. Reducing barriers to Tribal-led prescribed fire was identified as a priority to ensure that cultural burning can be implemented effectively and safely as part of a proactive fire management strategy.

Recommendations:

- **Institutionalize Indigenous Practices:** Treat TEK as a component of modern fire management and integrate it into planning, operations, and decision-making.
- **Respect Tribes as Co-Managers:** Recognize Tribes as knowledge holders and partners, not just stakeholders.
- **Support Tribal-Led Burning:** Reduce barriers and provide resources for prescribed and cultural burning initiatives.
- **Integrate into Regional Plans:** Require Tribal consultation and inclusion of Indigenous fire stewardship practices in Regional Fire Management Plans.

Workforce Development

Workforce development was highlighted as a recurring and critical need. Tribes urged the creation of year-round positions that combine suppression, fuels mitigation, vegetation management, and recovery work to ensure a comprehensive approach to fire management beyond seasonal response. Targeted recruitment in Tribal communities, career advancement opportunities for Indian employees, and partnerships with Tribal colleges and universities were recommended to build a strong pipeline into wildland fire careers. Suggestions included internships, training programs, scholarships, and even voluntary programs offering student loan forgiveness for young Tribal members who commit to several seasons of service.

Recommendations:

- **Year-Round Positions:** Develop roles that integrate suppression, fuels, vegetation management, and recovery for continuity and resilience.

- **Targeted Recruitment:** Focus on hiring from Tribal communities and supporting career growth and leadership development.
- **Education Partnerships:** Collaborate with Tribal colleges and universities to create pipelines through internships, training, and scholarships.

Data Sovereignty & Secure IT Access

In general, Tribes emphasized the critical importance of protecting cultural and sensitive data while ensuring seamless interoperability with federal wildfire systems. This includes safeguarding unique cultural data layers, enabling secure integration with various platforms and providing cost-free technical support for implementation. These measures uphold Tribal sovereignty, strengthen resilience, and foster equitable collaboration in wildfire management.

Recommendations:

- **Protect Cultural Data:** Ensure Tribal data layers remain secure and under Tribal control.
- **Enable Interoperability:** Provide seamless, secure integration with USWFS systems (IQCS, IROC, medical standards).
- **Offer Cost-Free Support:** Guarantee technical assistance for integration without creating a financial burden on Tribes.

Co-Stewardship (Trust Responsibility) and Cross-Boundary Collaboration

Tribal leaders and representatives emphasized the importance of Co-Stewardship as a cornerstone of honoring the federal trust responsibility and advancing shared land management goals. Some acknowledge successful co-stewardship models that have fostered mutual respect, cultural inclusion, and effective resource management. Tribes urged that these models not only be preserved but expanded beyond fuels management to include post-fire recovery efforts, ensuring continuity of collaboration through all phases of fire response and restoration.

Additionally, there was strong support for further cross-boundary collaboration, particularly where Tribal lands border federal jurisdictions. Tribes called for a framework of shared responsibility and collaborative planning that transcends administrative boundaries, recognizing that wildfire does not adhere to jurisdictional lines. This approach requires integrated strategies, joint decision-making, and equitable resource allocation to protect communities, ecosystems, and cultural resources.

Tribes highlighted successful co-stewardship models and asked that these be preserved and expanded not only for fuels management projects but post-fire recovery. Strong support for

cross-boundary fire management, especially where tribal lands border federal lands. Call for need for shared responsibility and collaborative planning across jurisdictions.

One Tribe stressed the need to move from project-based administration to recurring and compactable funding for programs such as the Reserved Treaty Rights Lands (RTRL) and Tribal Forest Protection Act (TFPA). Project-by-project funding was described as unsustainable, and Tribes advocated for expansion of these programs to ensure long-term stability. The U.S. Fish and Wildlife Partners Program was cited as an example of partnership that should be strengthened and aligned with these goals.

Recommendations:

- **Preserve and Expand Co-Stewardship Models:** Maintain successful models and scale them to include post-fire recovery, not just fuels management.
- **Honor Trust Responsibility:** Federal agencies must uphold commitments to tribes through meaningful engagement and shared decision-making.
- **Strengthen Cross-Boundary Fire Management:** Collaboration is critical where Tribal and federal lands intersect, ensuring coordinated prevention, suppression, and recovery efforts.
- **Shared Responsibility Across Jurisdictions:** Wildfire management requires joint planning and resource sharing among tribes, federal agencies, and other partners.
- **Integrate Cultural and Ecological Priorities:** Tribal knowledge and cultural values should inform fire management strategies and restoration practices.
- **Shift to Sustainable Funding Models:** Expand RTRL and TFPA programs; transition from project-based funding to recurring, compactable funding streams. Project-by-project funding is not sustainable for long-term stewardship.
- **Leverage Partnership Programs:** Strengthen collaboration through initiatives like the U.S. Fish and Wildlife Partners Program to support integrated conservation and fire management goals.

Concerns Beyond Current Consultation

- **Outstanding Reimbursements:** Santa Ynez Band of Chumash Indians submitted a detailed set of questions and concerns regarding the implementation of Secretarial Order 3443 and the formation of the USWFS, including details regarding unpaid invoices totaling approximately \$8.6 million since 2019. Karuk Tribe also stated they have an estimated \$3 million owed from outstanding invoices.
- **Escrow Funding:** Karuk Tribe proposes establishing an escrow account to provide upfront funding for reimbursable activities.

- **Budget Consolidation:** Karuk Tribe seeks to consolidate multiple budget lines into a single compactable budget for greater flexibility.
- **Regenerative Economies:** Karuk Tribe recommends reinvesting program income from mobilizations into regenerative systems that support long-term sustainability.
- **Post-Fire Recovery Fund:** Rocky Mountain Tribal Leaders Council recommends creating a dedicated fund for cultural site restoration, reforestation, watershed protection, and wildlife habitat recovery aligned with treaty-reserved rights.
- **Pay Parity & Benefits:** Several Tribes advocate for continued firefighter pay parity and expanded benefits, including retirement; changes require legislation and are outside the current consultation scope.
- **Recruitment & Loan Forgiveness:** Navajo Nation proposes a voluntary program recruiting Tribal youth for seasonal wildland fire work in exchange for student loan forgiveness.
- **Medical & Fitness Access:** Navajo Nation requests that required medical and fitness physicals be available through Indian Health Service and Tribal clinics.
- **Agreement Clarity:** Tribes request clarification on how unification will affect existing agreements (Emergency Equipment Rental Agreements, operating plans, dispatch plans, cultural burning, cooperative agreements) and assurance these agreements will be honored.
- **Expanded Tribal Authority:** Fond du Lac seeks primary response authority on non-trust and band fee lands within reservation boundaries and supports a legal framework for USWFS to operate on private lands with cooperative landowners.
- **Comprehensive Service Model:** Success depends on creating a fully integrated wildfire service, including USFS within USWFS.
- **Enhanced Risk Assessment:** Confederated Tribes of Grand Ronde recommended that risk models include fuel load/density, recreation access, proximity of fuels to communities, poverty levels, and financial risks such as timber value.
- **Environmental Monitoring:** Rocky Mountain Tribal Leaders Council recommends incorporating water quality monitoring, suppression impact assessments, and air/water health evaluations into all fire management and recovery plans.
- **U.S. Forest Service Integration Concerns:** Tulalip Tribe opposes merging U.S. Forest Service firefighting with the Interior, citing differing roles and expertise, such as place-based knowledge and treaty resource management responsibilities.

- **Recreation & Wildfire Risk:** Tulalip highlights inadequate federal planning for the growing link between recreation access, human-caused ignitions, and wildfire risk, especially amid initiatives like the proposed Roadless Rule rescission.

Conclusion

The comments received reflect broad support among Tribal Nations for improving wildland fire management through program unification, provided it is implemented in partnership with Tribes and in a manner that respects sovereignty, treaty rights, and federal trust responsibilities. Tribes emphasized priorities such as meaningful and ongoing government-to-government consultation, protection and expansion of P.L. 93-638 contracting authority, equitable funding and timely reimbursements, and integration of Indigenous knowledge into planning and operations. Additional concerns include maintaining local capacity and operational continuity, ensuring transparency in organizational design and geographic area boundary decisions, and safeguarding data sovereignty. Recommendations highlight the need for clear communication protocols, application of Indian Preference within the organization, strengthening workforce development, sustainable funding models, and frameworks for co-stewardship and cross-boundary collaboration. Collectively, these perspectives underscore the importance of inclusive governance and culturally informed strategies to strengthen wildfire resilience across Tribal and federal lands.