



LOCAL 777

INTERNATIONAL FEDERATION OF PROFESSIONAL & TECHNICAL ENGINEERS, AFL-CIO
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June 3, 2026

via www.regulations.gov

Re: Proposed Rule, Differential Pay for Prescribed Wildland Fire Activities

Docket ID: OPM-2026-0199
RIN 3206-AO76

I am writing on behalf of Local 777 of the International Federation of Professional and Technical Engineers (IFPTE), AFL-CIO. We represent federal workers in recognized bargaining units; as well as unorganized associate members; in the U.S. Army Corps of Engineers.

Among other employees we represent, we have members who conduct prescribed burn activities at US Army Corps of Engineers flood control dams and similar facilities. These employees include both maintenance mechanics in the Federal Wage System, and park rangers in the General Schedule.

We support the proposed rule. We agree that many of the hazards inherent in wildland firefighting are present in controlled/prescribed burn situations.

Our only suggestion would be that OPM consider issuing guidance with the final rule directing agencies to implement the rule as soon as possible (including after meeting collective bargaining obligations). We are concerned that agencies could unreasonably delay implementation, which would frustrate the well-reasoned intent of this rule.

Sincerely,
Colin C. Smalley
President