



Alliance of Nurses for
Healthy Environments



April 2, 2026

John Howard, MD, JD
Director
National Institutes for Occupational Safety and Health
1600 Clifton Road Room 4505, MS E-20
Atlanta, GA 30329

Re: Comments on Center for Firefighter Safety, Health and Well-Being Portfolio for Centers for Disease Control and Prevention's (CDC) National Institute for Occupational Safety and Health (NIOSH) request for information, Docket # CDC-2026-0133 NIOSH-356.

The undersigned public health, medical and nursing organizations appreciate the opportunity to comment on NIOSH's request for information on the Center for Firefighter Safety, Health and Well-Being Portfolio. Smoke from wildland, urban interface and structure fires poses an increasingly frequent and severe threat to everyone's health, especially firefighters and other responders. NIOSH engagement is needed to ensure health protections are included in key policy decisions currently being discussed. In addition, more robust research is needed to help inform better health protections.

The points discussed below have a stronger emphasis on wildland firefighting than structural firefighting. Structural firefighting shares some of the needs identified below and has other important priorities not discussed here, but for the sake of these comments this letter focuses more on wildland fires.

Research Needs

Several research priorities related to firefighter health and safety continue to need support. Broadly, research topics that would aid in greater health and safety progress include:

- Efforts to address and improve the physical, mental, and emotional impacts to firefighter health and safety before, during and following firefighting activities. This includes more examination of how these areas of health may differ for firefighters

between structural, wildland, and combined types of fire at the wildland-urban interface.

- Opportunities for the safe and practical use of personal protective equipment for wildland firefighters on long duration assignments and in remote locations.
- Additional human health risk assessments for workers exposed to wildland fire smoke as well as fires in the built environment. This information should help inform the creation or improvement of best management practices meant to mitigate the impacts of exposures that occur with fire responses, including cumulative, high intensity and long-duration exposures.

When applicable, both acute and cumulative exposure to smoke should be included in research and evaluations.

Health Engagement

NIOSH expertise is needed to ensure firefighter health and safety, along with public health in general, is being represented in vital discussions happening at the national and local levels. Many decisions will be made this year that will have a long-lasting impact on health and safety related to wildfire and we urge you to proactively represent health in all spaces where fire response is discussed. Opportunities for health-focused engagement include:

- Responding to executive orders and/or congressional directives within US Department of Interior and other interagency collaborations related to federal fire response programs. As agencies shape the future of wildfire response, it is critical that health protection for firefighters and the public at large be incorporated into every step of the process and any resulting implementation response plans.
- Similarly, representing health perspectives while developing or expanding policies on the use of prescribed burning to reduce wildfire risk or managed wildfires in select circumstances where naturally occurring fires may be safely allowed to continue burning. Both are possible tools for reducing larger, potentially catastrophic wildfires on the landscape, but need to be done in close coordination with air and health experts under strong guidance and rules that protect the health and safety of firefighters and mitigate smoke impacts for the public at large.
- Informing policy discussions for lawmakers and other decision-makers as potential new policies are debated. For example, late in 2025 members of Congress introduced the Healthy Lungs for Heroes Act, partly in response to media coverage on the lack of personal protection equipment for use by, or available to, wildland firefighters while on the job. NIOSH should help ensure that lawmakers have up-to-date information on what equipment may or may not be suitable, its potential limitations or impacts for firefighters while in service and other considerations necessary for the nation to set policies and rules that improve protection for the health and safety of wildland firefighters.
- Providing resources to state, local and Tribal public health agencies and healthcare providers to assist with fire and smoke readiness and response. Local communities are working to prepare for the ongoing threat of large wildfires and smoke episodes

and to be better prepared for protecting residents and treating firefighters and others exposed to smoke. The Center should assist these efforts by sharing information and resources that can build local capacity and improve the efficiency and effectiveness of preparations and responses.

We appreciate the opportunity to provide comments on NIOSH's research and engagement priorities for protecting firefighter safety and health and urge you to set a robust agenda equal to the growing threat and need of this important topic.

Signed,

Alliance of Nurses for Healthy Environments
American College of Chest Physicians
American Lung Association
American Public Health Association
American Thoracic Society
Climate Psychiatry Alliance
Medical Students for a Sustainable Future
Montana Health Professionals for a Healthy Climate
National Environmental Health Association