

The Honorable Michael S. Regan, Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington DC 20460

Dear Administrator Regan and members of Congress:

The widespread [concern](#) among lawmakers and the public at large about wildfires and the pollution they generate is understandable.

However, we are alarmed to see [several articles](#) attacking the EPA's efforts to regulate PM2.5 particles (fine particulates), claiming that the EPA is obstructing prescribed burning programs that are being carried out ostensibly to reduce wildfires. The call for increasingly more aggressive and more frequent prescribed burning and forest thinning as a control strategy is misguided, will not control climate-driven wildfires, and will increase the public's overall exposure to smoke particulates. For example, [a recent study](#) in Australia, using state of the art modeling, found that prescribed burns eventually increased wildfire risk.

“Burning kept fire risk down for a few years, but, compared to old forests that had not been burned, ‘fuel reduced’ areas became much more fire prone for decades afterward. Once those treated areas were compared to old forests with no record of fire for decades, it was clear that the burning programs had actually created the main fire risk...Whereas the traditional view sees forests as becoming increasingly dangerous as plants grow back, we’ve shown that the opposite is true...Left alone, these forests burn with much smaller flames, store far more carbon, and provide safe habitat for the many species now threatened by frequent fire.”

Numerous other studies dating back 20 years have accumulated a strong case against the twin strategies of forest burning and thinning as a wildfire control strategy. For example, the [largest relevant study](#) ever done, covering over 1,500 fires across 23 million acres, concluded that weather and climate factors drive wildfires and, in fact, the more “thinning” of trees that occurs in a forest, the more quickly and intensely a wildfire burns. The authors concluded:

“We found forests with higher levels of protection [from tree removal] had lower severity values even though they are generally identified as having the highest overall levels of biomass and fuel loading.”

Increasingly, even the Forest Service's own scientists are reaching the same conclusion. In a landmark 30-year study, [Forest Service scientists recently reported](#) the following:

“More open forests with lower biomass had higher fire severity, because the type of open, lower-biomass forests resulting from thinning and other logging activities have ‘hotter, drier, and windier microclimates, and those conditions decrease dramatically over relatively short distances into the interior of older forests with multi-layer canopies and high tree density...”

Finally, landscape scale spraying of herbicides is now being used in many areas as a follow up to prescribed burning for persistent vegetation suppression. Herbicides are biologic poisons to virtually all living organisms and they are toxic to humans at relevant environmental exposures. This strategy cannot be accepted as anything less than an additional hazard to humans and wildlife.

In short, the assumption that we must use unnaturally frequent prescribed fires as a new type of wildfire suppression tactic, and “thin” (log) our way to reducing wildfires, is not only counterproductive, it is a distraction from the most relevant issue: it is the climate crisis that must be dealt with, and removing carbon from our forests and putting it into the atmosphere will only make matters worse.

The US Forest Service is leading a campaign that is climate malpractice, public health malpractice, and forest management malpractice. We call on our members of Congress to stop providing funds for destructive degradation and deforestation of American forests, and we call on EPA to resist pressure from some in Congress, and from lobbyists who seek to prevent stricter PM2.5 standards for the purpose of permitting industrial-scale prescribed burns in combination with landscape-level commercial logging under the guise of “thinning”.

Sincerely,

350 Eugene
Alliance for the Wild Rockies
Athens County's Future Action Network,
ACFAN
Battle Creek Alliance & Defiance Canyon
Raptor Rescue
Bellingham Insight Meditation Society
Blue Mountains Biodiversity Project
Cascadia Climate Action Now
Citizens Against Corporate Logging
Clean Energy Action, CO
Climate Generation
Conservation Congress
Cook Keyes Land Inc

Deer Creek Valley Natural Resources
Conservation Association
Dogwood Alliance
Earth Action, Inc.
Earth Neighborhood Productions
Eco-Integrity Alliance
Empower Our Future, CO
Endangered Species Coalition
Energy & Environment Initiative, CO
Democratic Party
Forest Web
Friends of the Clearwater
Friends of the Ferdinand State Forest
Green Cove Defense Committee
Green Snohomish

Group Against Smog & Pollution
Hazelwood Urban Agriculture Team
Indiana Forest Alliance
John Muir Project
Kulshan Cares, LLC
Multifaith Network for Climate Justice
Native Ecosystem Council
Natural Terrestrial Solutions (NTS) Group
Protect Our Woods
RESTORE: The North Woods
Rogue Valley Broadband, Great Old Broads
for Wilderness
Santa Fe Forest Coalition
Selkirk Conservation Alliance
Sequoia ForestKeeper
Swan View Coalition
Tennessee Heartwood
The Enviro Show

The Lantern Bearers
The People's Justice Council
Turtle Haven Sanctuary
Umpqua Watersheds
Utah Physicians for a Healthy Environment
Wellspring Spa
Wild Orca
Williams Community Forest Project
Yellowstone to Uintas Connection

Tonja Chi, MS
Rebecca Diehl
Trudy Dunaway-Brown
Tammy Dziadek
Marion Edey
William Hermann
Maya Khosla, MS
Diane M. Sue

cc: The Honorable Thomas Vilsack, Secretary, U.S. Department of Agriculture
The Honorable Deb Haaland, Secretary, U.S. Department of the Interior
The Honorable Joe Goffman, Principal Deputy Administrator, Environmental
Protection Agency