Letters of opposition to the House Farm Bill (H.R. 2) Linked and Pasted Below:

- <u>9 Public Health Organizations Oppose House Pesticide Provisions and the Undermining</u> of State and Local Authority to Protect Public Health and Safety. 8/29/18
- <u>16 Experts in Wildfire and Forest Science warn of Harms to National Forests from Anti-</u> Science House Farm Bill Forest Title and Urge Conferees to reject the House Bill. 8/28/18
- <u>38 Senators Urge Farm Bill Conferees to oppose Anti-Environmental Provisions in House</u> <u>Farm Bill. 8/23/18</u>
- <u>107 U.S. Representatives Urge Farm Bill Conferees to Reject Long List of Harmful</u> <u>Environmental Provisions in House Farm Bill. 8/28/2018</u>
- <u>171 Local and National Organizations write in Opposition to House Farm Bill Attacks on</u> <u>Environment including on Endangered Species, Conservation Programs and National</u> <u>Forests and Urge conferees to oppose. 8/22/18</u>
- <u>215 Scientists Oppose Forestry provisions in House Farm Bill as Harmful to National</u> <u>Forests and Communities. 8/28/18</u>

August 29, 2018

The Honorable Michael Conaway Chairman House Committee on Agriculture 1301 Longworth House Office Building Washington, DC 20515

The Honorable Pat Roberts Chairman Senate Committee on Agriculture, Nutrition & Forestry 328A Russell Senate Office Building Washington, DC 20510 The Honorable Collin Peterson Ranking Member House Committee on Agriculture 1305 Longworth House Office Building Washington, DC 20515

The Honorable Debbie Stabenow Ranking Member Senate Committee on Agriculture, Nutrition & Forestry 328A Russell Senate Office Building Washington, DC 20510

Dear Chairman Conaway, Ranking Member Peterson, Chairman Roberts, and Ranking Member Stabenow:

As you reconcile the House and Senate Farm Bills, our organizations urge you to reject provisions that undermine the health of Americans.

The Farm Bill is an opportunity to protect the safety and security of food and to increase the health of the nation. Unfortunately, many provisions included in the House version of the 2018 Farm Bill (H.R.2 - Agriculture Improvement Act of 2018) would expose Americans to greater amounts of pesticides, toxic chemicals, and other hazards and could harm human health.

Specifically, the final bill should eliminate provisions that prevent state and local governments from acting to protect their constituents. Local governments can often act more quickly and specifically than the federal government in response to immediate threats. To adequately protect human health and respect the right of the states, the federal government should set minimum protections and allow the states to set regulations that make sense for their community. Similarly, the final bill should reject provisions that undermine federal government's ability to protect Americans from water pollution and from pesticides and other dangerous pollutants.

The provisions described below could result in more exposure to chemicals and elevate the risks that Americans face both on and off the farm.

- Local pesticide laws: Section 9101 prohibits local governments from adopting their own pesticide rules, even if new data links them to adverse health impacts. This provision would overturn decades of precedent and Supreme Court rulings, and could prevent communities from tailoring laws against harmful chemicals.
- Clean Water Act and pesticides: Section 9117 of the House bill eliminates the Clean Water Act's permit requirement for directly discharging pesticides into waterways. Proponents of this measure inaccurately state that the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA) approval is sufficient to protect human health. However, FIFRA approval does not take into consideration locally specific considerations such as whether the waterbody is used for fishing and swimming or whether it is already impaired. These considerations are crucial for limiting

human exposure to pesticides through waterways. The amendment would risk increased human contact with pesticides and also deprive local officials of information about what pesticides are being directly discharged into waterways.

- Pesticides and human health: Section 9119 enacts the "Pesticide Registration Improvement Act" in a form that provides long-term funding to EPA for expedited processing of pesticide approval applications, without accompanying measures to ensure that farmworkers and other pesticide applicators are safe.
- The King Provision: Sections 11701 and 11702 block any state regulation of an agricultural product produced in another state, if that regulation is more protective than the federal counterpart. Under the King provision, a state could not ban the in-state sale of produce covered in highly toxic pesticides from other states. Additionally, this provision would give producers of highly dangerous products a right to sue states that protect themselves for financial damages. The language is so sweeping and vague that it could prevent states from taking immediate action when a chemical applied to out-of-state agricultural products is found to be extremely dangerous.

These and other provisions that undermine human health have no place in a bill that is intended to nourish the nation. As you continue working towards a final Farm Bill, we once again urge you to reject these provisions and deliver a bill that protects and improves public health.

Sincerely,

Alliance of Nurses for Healthy Environments American Public Health Association Breast Cancer Prevention Partners Health Care Without Harm March of Dimes Medical Advocates for Healthy Air The Michael J. Fox Foundation for Parkinson's Research Physicians for Social Responsibility Union of Concerned Scientists

CC: Farm Bill Conferees in the United States Senate

Farm Bill Conferees in the United States House of Representatives

August 28, 2018

Senator Pat Roberts Chairman, Senate Committee on Agriculture, Nutrition, and Forestry 328A Russell Senate Office Building Washington, D.C. 20510

Senator Debbie Stabenow Ranking Member, Senate Committee on Agriculture, Nutrition, and Forestry 328A Russell Senate Office Building Washington, D.C. 20510 Representative K. Michael Conaway Chairman, House Committee on Agriculture 1301 Longworth House Office Building Washington, D.C. 20515

Representative Collin C. Peterson Ranking Member, House Committee on Agriculture 1010 Longworth House Office Building Washington, D.C. 20515

Dear Chairmen Roberts and Conaway and Ranking Members Stabenow and Peterson:

As scientists with extensive experience in the fields of natural resource management and forest and wildfire ecology, we write to raise concerns about the threats to science-based forest management and public engagement across our national forests posed by the House-passed farm bill.

In June, the House and Senate passed farm bills with very different approaches to solving environmental problems in the national forests managed by the U.S. Forest Service. As you negotiate the 2018 farm bill, we urge you to avoid the House's proposals, which are inconsistent with science-based management principles and would seriously damage our national forests while reducing Americans' say in how these forests are managed.

Everyone agrees that our national forests provide important wildlife habitat, supply clean drinking water to hundreds of cities and towns, and offer outdoor recreation opportunities to Americans nationwide. Where opinions differ is in the care and protection of forests, and those differences have major consequences for our national forests and the people who live, work, and recreate on them.

In the spring, Congress enacted reform of the nation's system of funding wildfire suppression in our national forests. As a result, Forest Service programs will no longer be robbed to pay for fire suppression, and more resources will be available for much needed restoration and community protection efforts. The House's proposals in the farm bill, by contrast, would curtail the transparency, citizen input, and informed decision-making that help ensure national forest management projects are scientifically based and socially acceptable.

Wildfire, especially when it affects our homes and families, appropriately heightens emotions, and wildfire management challenges will only increase with the increasingly acute effects of climate change. Protection of life and property should always be the top priority during any wildfire. Fuel reduction activity to reduce wildfire impacts needs to prioritize areas near communities in what is known as the Wildland Urban Interface, rather than remote backcountry areas of our national forests.

Wildfire funding and management should concentrate on effective, science-based prevention programs such as controlled burning and fuel reduction. But the House bill does not properly address these issues. Instead, it ignores the critical role of climate change in driving today's wildfires and focuses on accelerated commercial logging and road building — which generally exacerbate fire risk — with little consideration of impacts on water quality, wildlife, or recreational values.

Contained in the House farm bill are a number of new "categorical exclusions" from the National Environmental Policy Act (NEPA) for particular projects or management situations. NEPA, signed into law by President Nixon, has helped ensure for almost a half century that all stakeholders have a voice in management decisions. It also ensures that a project's impacts are properly evaluated using applicable scientific information. However, the House bill limits public input and environmental review on logging projects as large as 6,000 acres (almost 10 square miles) when removing fire-damaged trees, spraying herbicides, or creating openings for wildlife.

Projects designed to improve forest conditions and wildlife habitat must include input from scientists and interested stakeholders, including state and tribal wildlife agencies. This will help ensure that commercial logging activities, including thinning, conform to forest management plans and are conducted using the best scientific management practices and at ecologically appropriate scales.

Many of the House bill's forestry provisions are not supported by science. For instance, the bill seeks to aggressively expand post-fire "salvage" logging on public lands to prevent wildfire, when in reality post-fire logging occurs primarily for economic reasons and rarely contributes to ecological recovery in the disturbed area. Post-fire logging of dead or dying trees is appropriate near roads where standing dead trees pose a safety hazard but should generally be avoided in areas where maintaining natural ecosystem processes is a priority. However, the House language does not recognize this key distinction.

The House legislation also exempts the Forest Service from analyzing cumulative environmental effects of multiple categorical exclusion projects in the same vicinity. This violates a

fundamental principle of scientifically sound public land management — that of ensuring that management activities collectively do not produce environmentally destructive outcomes.

These exemptions from conservation law would dramatically reduce public participation in decision-making on the national forests. These forests are public lands, managed for a variety of services benefiting many different stakeholders. Management alternatives should be provided to the public for their consideration to help ensure that multiple interests are balanced. Adoption of procedures usurping public participation, as proposed by the House, would result in major public pushback against active management.

By exempting controversial projects from meaningful evaluation and public engagement, the House farm bill runs counter to basic principles of science-based forest management, including the use of best available science and the application of robust decision-making processes. If they were to become law, the House farm bill's forestry provisions would result in poorly planned, ineffective and harmful management actions that fail to address the vital need to improve the climate and fire resiliency of our national forests and the safety of our communities.

Congress must avoid measures that would reduce public support for urgently needed active management on our national forests. Weakening conservation laws and removing scientific underpinnings of management decisions is not constructive. We urge you to reject the rollbacks of environmental safeguards in the House farm bill.

Sincerely,

Norman Christensen, Ph.D., Emeritus Professor, Ecology and the Founding Dean of the Nicholas School of the Environment, Duke University, Durham, NC

Jerry Franklin, Ph.D., Professor, Forest Ecosystems, University of Washington, Seattle, WA

James K. Agee, Ph.D., Professor Emeritus, Forest Ecology School of Environmental and Forest Sciences, University of Washington, Seattle, WA

Christopher J. Dunn, Ph.D., Research Associate, College of Forestry, Oregon State University, Corvallis, OR

James Johnston, Ph.D. Research Associate, College of Forestry, Oregon State University, Corvallis, OR

Leda N. Kobziar, Ph.D., Director, Fire Ecology & Management Master of Natural Resources, University of Idaho, Coeur d'Alene, ID

Andrew J. Larson, Ph.D., Associate Professor, Forest Ecology, University of Montana, Missoula, MT

Max A. Moritz, Ph.D., Cooperative Extension Wildfire Specialist, U.C. Division of Agriculture & Natural Resources and Adjunct Professor, Bren School of Environmental Science & Management, U.C. Santa Barbara, Santa Barbara, CA

Barry R. Noon, Ph.D., Emeritus Professor, Department of Fish, Wildlife and Conservation Biology Graduate Degree Program in Ecology, Colorado State University, Fort Collins, CO

Reed F. Noss, Ph.D., President, Florida Institute for Conservation Science, Sarasota, FL

William H. Romme, Ph.D., Professor of Fire Ecology (emeritus), Colorado State University, Fort Collins, CO.

Trent Seager, Ph.D., Senior Forest Scientist, Sustainable Northwest, Portland, OR

Tania Schoennagel, Ph.D., Research Scientist, University of Colorado, Boulder, CO

Mark Swanson, Ph.D., Associate Professor, Landscape Ecology and Silviculture, Washington State University, Pullman, WA

Thomas W. Swetnam, Ph.D., Regents' Professor (Emeritus) of Dendrochronology and Watershed Management, Laboratory of Tree-Ring Research, University of Arizona, Tucson, AZ

Monica G. Turner, Ph.D., Eugene P. Odum Professor of Ecology and Vilas Research Professor Department of Integrative Biology (iBio), University of Wisconsin, Madison, WI

The points expressed in this letter are those of the signers and do not represent the official positions of the institutions to which they are affiliated.



August 23, 2018

The Honorable Pat Roberts Chairman Committee on Agriculture, Nutrition, and Forestry U.S. Senate 328A Russell Senate Office Building Washington, DC 20510-6000

The Honorable Debbie Stabenow Ranking Member Committee on Agriculture, Nutrition, and Forestry U.S. Senate 328A Russell Senate Office Building Washington, DC 20510-6000

Dear Farm Bill Conferee:

We are Senators who voted in favor of the Senate Farm Bill, which passed our chamber in a bipartisan vote of 86-11. As you begin your conference committee discussions to reconcile the Senate Farm Bill with the House-passed Farm Bill, we write to oppose environmental riders.

Avoiding controversial provisions that erode landmark environmental laws could pave the way to an on-time and widely supported reauthorization of the Farm Bill. Including environmental riders in the conference committee's deliberations will undoubtedly yield a partisan and protracted process that will prolong uncertainty for stakeholders and may ultimately produce a conference report that lacks the requisite votes for passage.

The Senate Farm Bill is the product of thoughtful, bipartisan negotiations, which resulted in a historic vote in favor of the bill's passage. We hope the President can sign a Farm Bill conference report into law before the current legislation expires on October 1. Unfortunately, the House Farm Bill contains a number of damaging anti-environment provisions that now make meeting the upcoming reauthorization deadline exceedingly difficult. These harmful riders, spread throughout the Forestry, Horticulture, and Miscellaneous titles of the House bill, subjected the legislation to unnecessary opposition on the House floor and now complicates the bipartisan cooperation needed to pass a final conference report.

Again, we write to express our strong opposition to gutting bedrock U.S. environmental and public health protections with provisions that threaten our air, water, lands, and wildlife. We urge you to bring forward a reconciled 2018 Farm Bill that is free of ideological distractions.

Sincerely,

Benjamin L. Cardin United States Senator

Thomas R. Carper

United States Senator

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Dianne Feinstein United States Senator

Ron Wyden United States Senator

Jack Reed United States Senator

Maria Cantwell United States Senator

Bernard Sanders United States Senator

Amy Klobuchar

United States Senator

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Tom Udall United States Senator

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Patty Murray United States Senator

Richard J. Durbin United States Senator

Bill Nelson United States Senator

Robert Menendez

United States Senator

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Robert P. Casey, Jr. United States Senator

Sheldon Whitehouse United States Senator

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Jeanne Shaheen United States Senator

Mark R Werner

Mark R. Warner United States Senator

Michael F. Bennet United States Senator

Christopher A. Coons United States Senator

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Brian Schatz United States Senator

Christopher S. Murphy United States Senator

Martin Heinrich United States Senator

Elizabeth Warren United States Senator

A. Merkley

Jeffrey A. Merkley United States Senator

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Richard Blumenthal United States Senator

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Mazie K. Hirono United States Senator

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Tim Kaine United States Senator

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United States Senator

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Cory A. Booker United States Senator

Chris Van Hollen

United States Senator

Gary C. Peters United States Senator

Tammy Uyhantt

Tammy Duckworth United States Senator

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Kamala D. Harris United States Senator

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Tina Smith United States Senator

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Margaret Wood Hassan United States Senator

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Catherine Cortez Masto United States Senator

The Honorable Mitch McConnell, Senate Majority Leader cc: The Honorable John Boozman, Senate Agriculture Committee Conferee The Honorable John Hoeven, Senate Agriculture Committee Conferee The Honorable Joni K. Ernst, Senate Agriculture Committee Conferee The Honorable Patrick J. Leahy, Senate Agriculture Committee Conferee The Honorable Sherrod Brown, Senate Agriculture Committee Conferee The Honorable Heidi Heitkamp, Senate Agriculture Committee Conferee The Honorable K. Michael Conaway, Chairman, House Agriculture Committee Conferee The Honorable Glenn Thompson, House Agriculture Committee Conferee The Honorable Bob Goodlatte, House Agriculture Committee Conferee The Honorable Frank D. Lucas, House Agriculture Committee Conferee The Honorable Mike Rogers, House Agriculture Committee Conferee The Honorable Austin Scott, House Agriculture Committee Conferee The Honorable Rick Crawford, House Agriculture Committee Conferee The Honorable Vicky Hartzler, House Agriculture Committee Conferee The Honorable Rodney Davis, House Agriculture Committee Conferee The Honorable Ted Yoho, House Agriculture Committee Conferee The Honorable David Rouzer, House Agriculture Committee Conferee The Honorable Roger Marshall, House Agriculture Committee Conferee The Honorable Jodey Arrington, House Agriculture Committee Conferee The Honorable Collin C. Peterson, Ranking Member, House Agriculture Committee Conferee The Honorable David Scott, House Agriculture Committee Conferee

The Honorable David Scott, House Agriculture Committee Conferee The Honorable Jim Costa, House Agriculture Committee Conferee The Honorable Timothy J. Walz, House Agriculture Committee Conferee The Honorable Marcia L. Fudge, House Agriculture Committee Conferee The Honorable Jim McGovern, House Agriculture Committee Conferee The Honorable Filemon Vela, House Agriculture Committee Conferee The Honorable Michelle Lujan Grisham, House Agriculture Committee Conferee The Honorable Ann Kuster, House Agriculture Committee Conferee The Honorable Tom O'Halleran, House Agriculture Committee Conferee The Honorable Tom O'Halleran, House Agriculture Committee Conferee Conferee

The Honorable Rick W. Allen, House Education and Workforce Committee Conferee The Honorable Alma S. Adams, House Education and Workforce Committee Conferee The Honorable John Shimkus, House Energy and Commerce Committee Conferee The Honorable Kevin Cramer, House Energy and Commerce Committee Conferee The Honorable Paul Tonko, House Energy and Commerce Committee Conferee The Honorable Jeb Hensarling, Chairman, House Financial Services Committee Conferee The Honorable Sean P. Duffy, House Financial Services Committee Conferee The Honorable Maxine Waters, Ranking Member, House Financial Services Committee Conferee

The Honorable Ed Royce, Chairman, House Foreign Affairs Committee Conferee The Honorable Steve Chabot, House Foreign Affairs Committee Conferee The Honorable Eliot Engel, Ranking Member, House Foreign Affairs Committee Conferee The Honorable Mark Walker, House Oversight and Government Reform Committee Conferee

The Honorable James Comer, House Oversight and Government Reform Committee Conferee

The Honorable Stacey E. Plaskett, House Oversight and Government Reform Committee Conferee

The Honorable Rob Bishop, Chairman, House Natural Resources Committee Conferee The Honorable Bruce Westerman, House Natural Resources Committee Conferee

The Honorable Raúl Grijalva, Ranking Member, House Natural Resources Committee Conferee

The Honorable Ralph Lee Abraham, House Science, Space, and Technology Committee Conferee

The Honorable Neal P. Dunn, House Science, Space, and Technology Committee Conferee

The Honorable Eddie Bernice Johnson, House Science, Space and Technology Committee Conferee

The Honorable Jeff Denham, House Transportation and Infrastructure Committee Conferee

The Honorable Bob Gibbs, House Transportation and Infrastructure Committee Conferee The Honorable Cheri Bustos, House Transportation and Infrastructure Committee Conferee

Congress of the United States Washington, DC 20515

August 27, 2018

Senator Pat Roberts Chairman, Senate Committee on Agriculture, Nutrition, and Forestry 328A Russell Senate Office Building Washington, D.C. 20510

Representative K. Michael Conaway Chairman, House Committee on Agriculture 1301 Longworth House Office Building Washington, D.C. 20515 Senator Debbie Stabenow Ranking Member, Senate Committee on Agriculture, Nutrition, and Forestry 328A Russell Senate Office Building Washington, D.C. 20510

Representative Collin C. Peterson Ranking Member, House Committee on Agriculture 1010 Longworth House Office Building Washington, D.C. 20515

Dear Chairmen Roberts and Conaway and Ranking Members Stabenow and Peterson:

As you endeavor to conference the House and Senate-passed legislation to reauthorize our nation's farm and nutrition programs, we write to share our concerns regarding any final agreement between House and Senate conferees. Simply stated, we cannot support any conference report that undermines investments in critical conservation programs or our nation's bedrock environmental laws.

We strongly support efforts to strengthen conservation programs in any final conference agreement. H.R. 2 cut conservation programs by \$800 million, completely eliminated the Conservation Stewardship Program (CSP) and rolled it into the Environmental Quality Incentives Program (EQIP). CSP is one of our nation's most important conservation programs. Through voluntary agreements with working farms, CSP improves soil, water and air quality; provides increased biodiversity and supports wildlife and pollinator habitat; sequesters carbon in the soil; and conserves water and energy use. Given the many challenges facing our American farmers, we should be working to expand our nation's conservation programs, not cut them.

We are also deeply concerned about several anti-environment provisions in H.R. 2 that threaten public health, including:

- Sec. 7605, which would allow USDA to transfer the Beltsville Agricultural Research Center a Superfund National Priority List (NPL) site to the Department of the Treasury without finishing the cleanup.
- Sec. 8506, which would mandate a sale of public land in New Mexico without a clearly identified public purpose.
- Sec. 9101, which preempts local governments from pesticides regulation.
- Secs. 9111, 9112, 9114, 9115, and 9116, which undermine the Endangered Species Act (ESA), making it easier to spray harmful pesticides at the expense of pollinators, threatened and endangered species, and public health.
- Secs. 9113, 9115, 9117, and 9118, which weaken the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), making it easier to spray harmful pesticides that threaten drinking water and public health.

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- Sec. 9119, which reauthorizes the Pesticide Registration Improvement Act (PRIA) without protections for farmworkers.
- Sec. 9121, which creates an "emergency event" loophole that would increase the use of the pesticide methyl bromide a powerful ozone-depleting chemical banned for most uses since 2005.
- Sec. 11614, which weakens the ESA and makes it more difficult for the services to make a jeopardy determination.
- Sec. 11615, which exempts producers from the Migratory Bird Treaty Act to kill black vultures.
- Sec. 11617, which repeals the 2015 Clean Water Rule and eliminates Federal Clean Water Act protections for the drinking water of one in three American families.

In addition, we oppose any additional changes to our forestry management and wildfire programs as included in Title VIII of H.R. 2. As you know, the recently enacted FY 2018 Omnibus spending bill (P.L. 115 – 141) included a budget fix for addressing the rising costs of fighting catastrophic wildfires. It also included several carefully-negotiated provisions to address forest management. H.R. 2 seeks a legislative "do over" of those provisions not included in the final Omnibus agreement. For these reasons, we oppose inclusion in any conference agreement of those provisions in Title VIII that weaken protections for federal lands and bedrock environmental laws, such as the National Environmental Policy Act (NEPA). Specifically, objectionable provisions include, but are not limited to: 8102, 8107, 8109, 8303, 8311, 8312, 8313, 8314, 8315, 8316, 8317, 8318, 8319, 8320, 8321, 8334, 8335, 8336, 8337, 8338, 8339, 8402, 8502, 8503, and 8508. Other sections of concern include: 8201, 8202, 8203, 8302(2), and 8333.

Finally, we oppose inclusion of H.R. 4879, the Protect Interstate Commerce Act, in any final agreement. While the House bill includes the "King Amendment," the consequences of this provision are far in reach and scope, both known and unknown. The King Amendment does more than prohibit any new regulations and preempt hundreds of existing state and local laws that oversee agriculture products imported state to state. This provision would virtually wipe out critical protections for communities and farmers that govern food safety, and air and water safety, workers' rights, community health, food labeling, fishing, animal welfare, permitting, record keeping, invasive species, and procurement. Instead of trampling critical consumer and farmer protections, we urge the conference to resoundingly reject this provision again as it did in the 2014 Farm Bill.

In addition to these concerns about conservation and environmental protection, we share other concerns with the House version of the bill, including its treatment of rural development, energy, and nutrition programs. We appreciate your attention to these matters and sincerely hope a final conference agreement will reject the House bill's cuts to the Supplemental Nutrition Assistance Program (SNAP), support our nation's farmers and consumers, and strengthen our nation's commitment to a clean and healthy environment for our children and grandchildren.

Sincerely,

1. Zal

A. Donald McEachin Member of Congress

Earl Blumenauer Member of Congress

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Alan Lowenthal Member of Congress

David N. Cicilline Member of Congress

Donald M. Payne,

Member of Congress

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Michael F. Doyle Member of Congress

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Anna G. Eshoo Member of Congress

Ruben J. Kihuen Member of Congress

Pramila Jayapa

Member of Congress

Colleen Hanabusa Member of Congress

Jamie Raskin Member of Congress

Joseph P. Kennedy, III Member of Congress

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Suzanne Bonamici Member of Congress

Ro Khanna

Member of Congress

Raja Krishnamoorthi Member of Congress

Chellie Pingree Member of Congress

Matt Cartwright

Member of Congress

Lois Frankel Member of Congress

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Debbie Wasserman Schultz Member of Congress

Donald S. Beyer Jr.

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Tim Ryan Member of Congress

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Brendan F. Boyle Member of Congress

Brenda L. Lawrence Member of Congress

Ruben Gallego Member of Congress

Pete Aguilar / Member of Congress

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Bill Foster Member of Congress

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Raul Ruiz, M.D.

Member of Congress

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Seth Moulton

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Michael E. Capuano Member of Congress

Mark Pocan Member of Congress

Ron Kind Member of Congress

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Anthony G. Brown Member of Congress

Kathleen M. Rice

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Tony Cárdenas Member of Congress

Raul M. Grijalva

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Donald Norcross Member of Congress

Bonnie Watson Coleman Member of Congress

Hakeem S. Jeffries Member of Congress

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Grace F. Napolitano Member of Congress

Adriano Espaillat Member of Congress

Niki Tsongas

Member of Congress

Kathy Castor

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Marcy Kaptar Member of Congress

Sheila Jackson Lee Member of Congress

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Karen Bass Member of Congress

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Gwen Moore Member of Congress

Keith Ellison Member of Congress

Adam Smith Member of Congress

Jerry McNerney Member of Congress

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Member of Congress

Albio Sires Member of Congress

Joe Courtney Member of Congress

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Alcee L. Hastings Member of Congress

José E. Serrano Member of Congress

Nita M. Lowey Member of Congress

Janice D. Schakowsky Member of Congress

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Mark Takano Member of Congress

Brian Higgins

Member of Congress

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Tulsi Gabbard Member of Congress

Nydia M. Velázquez

Member of Congress

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Alabama Rivers Alliance * Alaska Wilderness League * Alpine Lakes Protection Society American Bird Conservancy * American Forests * American Rivers * Amigos Bravos Atchafalaya Basinkeeper * Audubon Society of Corvallis * Audubon Society of Portland Bark * Beaver Valley Preservation Alliance * Beyond Pesticides Bird Conservation Network * Born Free USA * Buffalo Audubon Society California Native Plant Society * California Wilderness Coalition (CalWild) Cascade Forest Conservancy * Cascadia Wildlands * Center for Biological Diversity Cass County Chapter, Izaak Walton League of America * Center for Food Safety Center for Sierra Nevada Conservation * Central Maryland Beekeepers Association Central New Mexico Audubon Society * Citizens Climate Lobby Bend Oregon Chapter Clean Water Action * Coast Range Association * Coastal Enterprises, Inc. * Conservation NW Conservatives for Responsible Stewardship * Defenders of Wildlife Delaware Ecumenical Council on Children and Families * Delaware-Otsego Audubon Society Dugger Family Farm * Earthjustice * Earthworks * Endangered Habitats League Endangered Species Coalition * Environment America Environment Texas Environmental Law & Policy Center * Environmental Protection Information Center Farm to Table NM * Farmworker Association of Florida * Food and Water Watch Food Animal Concerns Trust (FACT) * Forest Issues Group * Frack Free Four Corners Friends of Grays Harbor * Friends of the Bitterroot * Friends of the Earth Friends of the IBA * Friends of the Invo * Friends of the WI Wolf & Wildlife Georgia ForestWatch * Geos Institute * Grand Canyon Trust Great Old Broads for Wilderness Greater Hells Canyon Council * GreenLatinos Gulf Restoration Network * Heartwood * High Country Conservation Advocates Hispanic Federation * Idaho Conservation League * Indiana Farmers Union Indiana Forest Alliance * Institute for Agriculture and Trade Policy Izaak Walton League Bush Lake Chapter * Johns Hopkins Center for a Livable Future Kansas Rural Center * Kentucky Environmental Foundation * Kentucky Heartwood Kentucky Waterways Alliance * Klamath Forest Alliance * Klamath Siskiyou Wildlands Center La Montanita Coop * Lassen Forest Preservation Group * League of Conservation Voters Los Padres ForestWatch * Lower Brazos Riverwatch * Maryland Ornithological Society Maryland Pesticide Education Network * McKeesport Community Garde Michael Fields Agricultural Institute * Milwaukee Riverkeeper * MountainTrue National Parks Conservation Association * National Sustainable Agriculture Coalition Natural Resources Defense Council * Nevada Conservation League New Mexico Environmental Law Center * New Mexico Food & Agriculture Policy Council New Mexico Interfaith Power and Light * New Mexico Sportsmen New Mexico Wilderness Alliance * New Mexico Wildlife Federation * New York City Audubon Nine Mile Run Watershed Association * North Cascades Conservation Council Northcoast Environmental Center * Northern Catskills Audubon Society, Inc. Occidental Arts and Ecology Center * Ohio Ecological Food and Farm Association Ohio Environmental Council * Once a Forest * Onondaga Audubon Oregon Environmental Council * Organic Consumers Association * Oregon Wild

Partnership for the National Trails System * PASA, Sustainable Agriculture * PennFuture Pennsylvania Council of Churches * People and Pollinators Action Network Pesticide Action Network North America * Pollinate Minnesota * Public Citizen Quiet Use Coalition * Rio Grande Restoration Rio Grande Valley Broadband of Great Old Broads for Wilderness * River Network Rocky Mountain Wild * Rural Coalition * Safe Alternatives for our Forest Environment San Diego Audubon Society * Santa Fe Forest Coalition * San Juan Citizens Alliance San Luis Valley Ecosystem Council * Save EPA * Save Our Sky Blue Waters Save the Manatee Club * Save Wolves Now Network * Sequoia ForestKeeper® Sheep Mountain Alliance * Sierra Club * Sierra Club Ohio Chapter Sierra Club Toiyabe Chapter * Sierra Foothills Audubon Society * Sierra Forest Legacy Soda Mountain Wilderness Council * South Umpqua Rural Community Partnership Southeast Alaska Conservation Council * Southern Environmental Law Center The Enviro Show * The Lands Council * The Wilderness Society * Toxic Free NC Southern Sustainable Agriculture Working Group * Turtle Island Restoration Network Umpqua Watersheds, Inc. * Union of Concerned Scientists * Upper Gila Watershed Alliance Virginia Association for Biological Farming * Washington Trails Association WE ACT for Environmental Justice * Western Environmental Law Center Western Nebraska Resources Council * Western Watersheds Project West Virginia Highlands Conservancy * Wild Farm Alliance WildEarth Guardians * Wilderness Workshop * Winter Wildlands Alliance Women, Food and Agriculture Network * Xerces Society for Invertebrate Conservation Yaak Valley Forest Council * Yukon River Inter-Tribal Watershed Council

August 22, 2018

Dear Farm Bill Conferee,

On behalf of our millions of members and supporters across the nation, our groups urge you to oppose all anti-environmental riders and support full conservation title funding in any final agreement between House and Senate conferees when reauthorizing our farm and nutrition programs.

There are more than 40 problematic provisions that undermine our environment and attack conservation in the House passed version of H.R. 2. Many of these controversial measures have already been rejected as standalone provisions and should not find refuge in any legislative vehicle, including the Farm Bill. Further, we reject the changes in the House version of H.R. 2 made to the Supplemental Nutrition Assistance Program, which hurt communities most in need and make it harder for low-income households to put food on the table.

Our nation needs and deserves a bipartisan Farm Bill that fosters food security and rural development without harm to clean water, wildlife, lands and public health, while supporting programs that help farmers respond to the challenges they face due to climate change, such as extreme weather, wildfire, flooding and drought.

As you head into conference, the undersigned groups urge you to reject H.R. 2 as passed by the House. While not all of our organizations work on all of the issues listed below, we are united in our desire to see a bipartisan bill that supports our nation's agricultural and conservation strengths while ensuring none of harmful provisions from the House Farm Bill are included in a final agreement.

As such, we encourage you to consider the following issues during your negotiations:

• **Clean Water** – H.R. 2 includes several sweeping attacks to vital clean water protections. Sections 9117 and 9118 together would gut Clean Water Act safeguards that keep our communities safe from pesticides sprayed directly into our water supplies. Pesticide contamination has contributed to nearly 2,000 instances of water impairment across the US, yet this "Poison Our Waters Provision" would take away any meaningful oversight of pesticides being sprayed directly into our waterways by slashing the commonsense Clean Water Act General Pesticide Permit Program and instead relying only on the federal pesticide registration law (the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA)), which does not require the tracking of pesticide applications.

An amendment was added to H.R. 2 that would repeal the 2015 Clean Water Rule, a commonsense safeguard that protects the drinking water sources of 117 million people and protects streams, headwaters, wetlands, and other water bodies that serve as critical habitat for wildlife, reduce flooding risk, and naturally filter pollution. This dangerous provision ignores the strong scientific foundation of the Clean Water Rule and subverts the entire rulemaking process by disregarding public input, including the over 1.5 million comments submitted in support of the Rule and opposing attempts to roll it back. Ultimately, this rider is nothing more than an attempt to help the Administration with their reckless, unpopular, and failing effort to decimate clean water protections.

• **Conservation** – Conservation takes an overall cut of nearly \$1 billion in H.R. 2. Most alarmingly within the title, the bill proposes to eliminate the Conservation Stewardship Program (CSP), the nation's largest conservation program by acreage and the only Farm Bill program focused on advanced conservation systems to comprehensively protect natural resources, including soil health, water quality, and wildlife habitat. The elimination of CSP, even while adding "stewardship contracts" within EQIP, eliminates nearly \$5 billion in funding for voluntary working lands conservation programs and fails to retain the core components of CSP, including a whole farm approach to conservation, an emphasis on environmental benefits, and the eligibility requirement to reach a good environmental stewardship level to enroll.

- Endangered Species This bill would severely undermine vital Endangered Species Act protections. Among the anti-wildlife provisions in this legislation is one of the most sweeping attacks ever on the Endangered Species Act: a "Poisoned Pollinator Provision" that seeks to eliminate liability when pesticides that are registered under the new procedures in the bill harm and kill species protected under the Act. This provision would also cut the expert federal wildlife agencies out of the Endangered Species Act consultation process, severely curtailing the government's ability to assess the effects of toxic pesticides on imperiled species, including pollinators, salmon, California condors, and whooping cranes. Yet another provision would undermine important Endangered Species Act consultations for forest management projects.
- **Forests/Public Lands** The bill is replete with provisions that undermine bedrock environmental laws, including the National Environmental Policy Act (NEPA), Endangered Species Act (ESA), and Roadless Area Conservation Rule (Roadless Rule). This bill consistently prioritizes the logging industry over all other national forest stakeholders. It would cause irreparable harm to our public lands; the millions of Americans who depend on them for clean drinking water, subsistence, recreation, and economic benefit; and the wildlife that call them home.
- **Pesticides** Section 9119 of the Farm Bill would facilitate the registration of harmful pesticides (via PRIA reauthorization) without any safeguards for the protection of farmworkers, pesticide applicators, and rural communities from pesticide exposure. Additionally, Section 9101 of the Farm Bill would preempt cities, counties and communities from taking action to restrict certain uses of pesticides to protect the health of children, workers, consumers or the environment. Also, Section 9121 would carve out unwarranted new exemptions from the international ban on the ozone-depleting and highly toxic pesticide methyl bromide.
- **States' Rights** With the inclusion of Representative King's HR 4879 legislation, the Farm Bill would prohibit state and local governments from protecting their citizens from agricultural products imported from other states by restricting their ability to regulate or legislate protections against such products. It would also strip the public of state law protections for agricultural products, and the accompanying right to enforce those protections through access to state courts. This attack on the public's substantive protections under state law and associated judicial rights is even more egregious because the bill language also expands judicial rights for industry in alarming ways.

In sum, we encourage you to remove ideological and special interest giveaways and provisions that harm public health and the environment in any Farm Bill. We encourage you to agree upon a clean, noncontroversial Farm Bill that fosters food security and environmental sustainability. Thank you for your review and consideration of these important issues.

Sincerely,

Alabama Rivers Alliance Alaska Wilderness League American Bird Conservancy American Forests American Rivers **Amigos Bravos** Atchafalaya Basinkeeper Audubon Society of Corvallis Audubon Society of Portland Bark **Beaver Valley Preservation Alliance Beyond Pesticides** Bird Conservation Network Born Free USA **Buffalo Audubon Society** California Native Plant Society California Wilderness Coalition (CalWild) Cascade Forest Conservancy Cascadia Wildlands Cass County Chapter, Izaak Walton League of America Center for Biological Diversity Center for Food Safety Center for Sierra Nevada Conservation Central Maryland Beekeepers Association Central New Mexico Audubon Society Citizens Climate Lobby Bend Oregon Chapter **Clean Water Action** Coast Range Association Coastal Enterprises, Inc. **Conservation NW** Conservatives for Responsible Stewardship Defenders of Wildlife Delaware Ecumenical Council on Children and Families Delaware-Otsego Audubon Society **Dugger Family Farm** Earthjustice Earthworks Endangered Habitats League **Endangered Species Coalition**

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Rural Coalition Safe Alternatives for our Forest Environment San Diego Audubon Society Santa Fe Forest Coalition San Juan Citizens Alliance San Luis Valley Ecosystem Council Save EPA Save Our Sky Blue Waters Save the Manatee Club Save Wolves Now Network Sequoia ForestKeeper® Sheep Mountain Alliance Sierra Club Sierra Club Ohio Chapter Sierra Club Toiyabe Chapter Sierra Foothills Audubon Society Sierra Forest Legacy Soda Mountain Wilderness Council South Umpgua Rural Community Partnership Southeast Alaska Conservation Council Southern Environmental Law Center Southern Sustainable Agriculture Working Group The Enviro Show The Lands Council The Wilderness Society **Toxic Free NC** Turtle Island Restoration Network Umpqua Watersheds, Inc. Union of Concerned Scientists Upper Gila Watershed Alliance Virginia Association for Biological Farming Washington Trails Association WE ACT for Environmental Justice Western Environmental Law Center Western Nebraska Resources Council Western Watersheds Project West Virginia Highlands Conservancy Wild Farm Alliance WildEarth Guardians Wilderness Workshop Winter Wildlands Alliance Women, Food and Agriculture Network Xerces Society for Invertebrate Conservation

Yaak Valley Forest Council Yukon River Inter-Tribal Watershed Council



Open Letter to Decision Makers Concerning Wildfires in the West

As scientists with backgrounds in ecological sciences and natural resources management, we are greatly concerned about proposals to speed up and expand logging on public lands in response to recent increases in wildfires in the West – proposals such as the House version of the 2018 Farm Bill. There are pragmatic, science-based solutions that can maintain biologically diverse fire-dependent ecosystems while reducing risks to communities and firefighters facing some of the most active fire seasons in recent memory. Unfortunately, such solutions are getting lost in the endless rhetoric and blaming that has characterized wildfires in the media, Congress, and the Trump administration. We the undersigned are calling on decision makers to facilitate a civil dialogue and careful consideration of the science to ensure that any policy changes will result in communities being protected while safeguarding essential ecosystem processes.

Why Is the West Burning and Is This Unnatural?

Wildfires have shaped the ecology of western ecosystems for millennia, whether lit by lightning or managed by American Indian tribes for cultural benefits. Wildfires vary in intensity and occurrence, across regions and vegetation types, elevation and climatic gradients, so there is no one-size-fits all strategy. The West has always burned and will always burn, and it needs to in order to maintain ecosystems and the myriad services they provide to the public in the form of carbon sequestration, clean water, abundant wildlife, and outdoor amenities. Attempting to suppress fires that are not a risk to communities is impractical, costly, risky to firefighters, and ecologically damaging. Also, forests are not the majority of the area burned annually on average in the United States; grasslands and shrublands are a large component of area burned annually that is unaffected by any forest management.

What is different today about wildfires is they are now burning over larger landscapes (more acres) since the 1980s, although overall fewer acres are burning today compared to that estimated in early decades and historical timelines.¹ Wildfire season in the West recently has lengthened from an average of five to seven months, and the number of large wildfires (>1,000 acres) has increased from 140 to 250 per year.² This is occurring as average annual temperature in the West has risen by nearly 2 degrees Fahrenheit since 1970s and winter snow pack has declined.³ Increases in acres burning can now be attributed, in part, to climate change⁴ and the

³Union of Concerned Scientists (UCS). 2017. Western wildfires and climate change.

 $http://www.ucsusa.org/global_warming/science_and_impacts/impacts/infographicwildfires-climate-change.html \end{tabular}. WcBXE5OGNTb$

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¹Littell, J.S. et al. 2009. Climate and wildfire area burned in western U.S. ecoprovinces, 1916-2003. Ecol. Applic. 19:1003-1021. Egan, T. 2009. The Big Burn. Mariner Books: Boston, NY. Parks, S.A. et al. 2015. Wildland fire deficit and surplus in the western United States, 1984-2012. Ecosphere 6:1-13.

²Dennison, P. et al. 2014. Large wildfire trends in the western United States, 1984-2011. Geophysics Research Letters 41:2928-2933.

⁴Abatzoglou, J.T., and A.P. Williams. 2017. Impact of anthropogenic climate change on wildfire across western US forests. PNAS 113:11770-11775.

increase is expected to continue in many areas with additional warming, leading to even greater suppression costs and loss of life.⁵

In addition to climate change, more than 80 percent of fires nationwide have been caused by people,⁶ and millions of homes are now in harm's way,⁷ resulting in skyrocketing costs. Putting more money into fire suppression will not reduce homeowner losses as long as homes continue to be built next to fire-adapted ecosystems, lack defensible space⁸ and/or fire-proofing, and measures are not taken to reduce human-caused wildfire ignitions.⁶

What Is Active Management and Does It Work to Reduce Fire Activity?

Active management has many forms and needs to be clearly defined in order to understand whether it is effective at influencing fire behavior. Management can either increase or decrease flammable vegetation, is effective or ineffective in dampening fire effects depending on many factors, especially fire weather, and has significant limitations and substantial ecological tradeoffs.

Thinning Is Ineffective in Extreme Fire Weather – Thinning is most often proposed to reduce fire risk and lower fire intensity. When fire weather is not extreme,⁹ thinning-from-below of small diameter trees followed by prescribed fire, and in some cases prescribed fire alone,¹⁰ can reduce fire severity in certain forest types for a limited period of time¹¹. However, as the climate changes, most of our fires will occur during extreme fire-weather (high winds and temperatures, low humidity, low vegetation moisture). These fires, like the ones burning in the West this summer, will affect large landscapes, regardless of thinning, and, in some cases, burn hundreds or thousands of acres in just a few days.¹² Thinning large trees, including overstory trees in a stand, can increase the rate of fire spread by opening up the forest to increased wind velocity, damage soils, introduce invasive species that increase flammable understory vegetation, and impact wildlife habitat.⁹ Thinning also requires an extensive and expensive roads network that degrades water quality by altering hydrological functions, including chronic sediment loads.

Post-disturbance Salvage Logging Reduces Forest Resilience and Can Raise Fire Hazards – Commonly practiced after natural disturbances (such as fire or beetle activity), post-disturbance clearcut logging hinders forest resilience by compacting soils, killing natural regeneration of

⁹Moritz, M.A., et al. 2014. Learning to coexist with wildfire. Nature 515: 58-66. Schoennagel, T., et al. 2017. Ibid.

¹⁰ Zachmann, L.J. et al. 2018. Prescribed fire and natural recovery produce similar long-term patterns of

change in forest structure in the Lake Tahoe basin, California. For. Ecol. and Manage. 409:276-287

¹¹Stone, C. et al. 2003. Forest harvest can increase subsequent forest fire severity.

⁵Schoennagel, T., et al. 2017. Adapt to more wildfire in western North American forests as climate changes. PNAS 114:4582-4590.

⁶Balch, J.K., et al. 2016. Human-started wildfires expand the fire niche across the United States. PNAS 114: 2946-2951. ⁷Syphard, A.D., et al. 2013. Land use planning and wildfire: development policies influence future probability of housing loss. PLoS ONE 8(8):71708. Strader, S.M. 2017. Spatiotemporal changes in conterminous US wildfire exposure from 1940 to 2010. Nat. Hazards https://doi.org/10.1007/s11069-018-3217-z.

⁸Cohen, J.D. 2000. Preventing disaster: home ignitability in the wildland-urban interface. J. of Forestry 98: 15-21.

 $https://www.fs.fed.us/psw/publications/documents/psw_gtr208en/psw_gtr208en_525-534_stone.pdf$

Brown, R.T., et al. 2004. Forest restoration and fire: principles in the context of place. Cons. Biol. 18:903-912. Kalies, E.I., and L.L.Y. Kent. 2016. Tamm Review: Are fuel treatments effective at achieving ecological and social objectives? A systematic review. For. Ecol. and Manage. 375:84-95. Goodwin, M.J. et al. 2018. The 15-year post-treatment response of a mixed-conifer understory plant community to thinning and burning treatments. <u>https://doi.org/10.1016/j.foreco.2018.07.058</u>¹²Stephens, S.L., et al. 2015. Large wildfires in forests: what can be done? Action Bioscience April 15

conifer seedlings and shrubs associated with forest renewal, increases fine fuels from slash left on the ground that aids the spread of fire, removes the most fire-resistant large live and dead trees, and degrades fish and wildlife habitat.¹³ Roads, even "temporary ones," trigger widespread water quality problems from sediment loading. Forests that have received this type of active management typically burn more severely in forest fires.¹³

Wilderness and Other Protected Areas Are Not Especially Fire Prone – Proposals to remove environmental protections to increase logging for wildfire concerns are misinformed. For instance, scientists¹⁴ recently examined the severity of 1,500 forest fires affecting over 23 million acres during the past four decades in 11 western states. They found fires burned more severely in previously logged areas, while fires burned in natural fire mosaic patterns of low, moderate and high severity, in wilderness, parks, and roadless areas, thereby, maintaining resilient forests. Consequently, there is no legitimate reason for weakening environmental safeguards to curtail fires nor will such measures protect communities.

Closing Remarks and Need for Science-based Solutions

The recent increase in wildfire acres burning is due to a complex interplay involving humancaused climate change coupled with expansion of homes and roads into fire-adapted ecosystems and decades of industrial-scale logging practices. Policies should be examined that discourage continued residential growth in ecosystems that evolved with fire. The most effective way to protect existing homes is to ensure that they are as insusceptible to burning as possible (e.g., fire resistant building materials, spark arresting vents and rain-gutter guards) and to create defensible space within a 100-foot radius of a structure. Wildland fire policy should fund defensible space, home retrofitting measures and ensure ample personnel are available to discourage and prevent human-caused wildfire ignitions. Ultimately, in order to stabilize and ideally slow global temperature rise, which will increasingly affect how wildfires burn in the future, we also need a comprehensive response to climate change that is based on clean renewable energy and storing more carbon in ecosystems.

Public lands were established for the public good and include most of the nation's remaining examples of intact ecosystems that provide clean water for millions of Americans, essential wildlife habitat, recreation and economic benefits to rural communities, as well as sequestering vast quantities of carbon. When a fire burns down a home it is tragic; when fire burns in a forest it is natural and essential to the integrity of the ecosystem, while also providing the most cost-effective means of reducing fuels over large areas. Though it may seem to laypersons that a post-fire landscape is a catastrophe, numerous studies tell us that even in the patches where fires burn most intensely, the resulting wildlife habitats are among the most biologically diverse in the West.¹⁵ For these reasons, we urge you to reject misplaced logging proposals that will damage

¹³Lindenmayer, D.B., et al. 2008. Salvage logging and its ecological consequences. Island Press: Washington, D.C. Thompson, J.R., and T.A. Spies. 2009. Vegetation and weather explain variation in crown damage within a large mixed-severity wildfire. For. Ecol. Manage 258:1684-1694.

¹⁴Odion et al. 2004. Fire severity patterns and forest management in the Klamath National Forest, northwest California, USA. Cons. Biol. 18:927-936. Zald, H., and C. Dunn. 2018. Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape. Ecol. Applic. 4:1068-1080. Bradley, C.M., et al. 2016. Does increased forest protection correspond to higher fire severity in frequent-fire forests of the western United States? Ecosphere 7:1-13.

¹⁵DellaSala, D.A., and C.T. Hanson. 2015. The ecological importance of mixed-severity fire: nature's phoenix. Elsevier: Boston http://www.sciencedirect.com/science/book/9780128027493 (Chapters 1 through 5, and 11).

our environment, hinder climate mitigation goals and will fail to protect communities from wildfire.

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