

November 15, 2019

Senator Jeff Golden
Senator Herman Baertschiger Jr.
Senator Lew Frederick
Senator Floyd Prozanski
Senator Kim Thatcher

CC: Governor Kate Brown
Matt Donegan

Re: Durable, Science-Based Wildfire Policy

Dear Senate Interim Committee on Wildfire Prevention and Recovery,

The undersigned organizations would like to thank you for your continued hard work to bolster the safety and resilience of our communities in response to wildfire. Our organizations work on issues ranging from climate change mitigation to forest conservation, from firefighting policy to public health. We share a common goal to **center Oregon's wildfire policies on durable, science-based strategies that prepare frontline communities for wildfires in the age of climate change, while protecting the numerous social and ecological values provided by Oregon's forests.**

We are writing to express our shared disappointment in the “mitigation” and “suppression” recommendations put forward by the Governor's Wildfire Response Council (the “Council”). We would also like to voice our support for the Council's “land-use” and “public health” recommendations and outline our preferred alternatives to the failed policies of the past.

Background

The Council was charged with assessing whether or not Oregon's current wildfire response is sustainable in the future, and with charting a new path forward that mitigates the growing risks posed by wildfires to communities. Early on, conservation groups put forward a community protection vision for the Council to accomplish that worthy goal.¹ Instead, the Council has recommended doubling-down on many of the failed approaches of the past: **commercial logging and aggressive fire suppression**. For decades, evidence has been mounting that these approaches do not protect people or property from the risks of wildfire, and too often compromise the resilience of forests and nearby communities to the impacts of climate change.

Below are the two WRC recommendations we found most concerning:

1. Proposal for \$4 Billion Thinning Program

The Council's Mitigation Subcommittee has proposed an unprecedented program to dramatically alter the forest conditions on a landscape-scale in an effort to “disrupt the

¹ Coalition Letter re: Governor Brown's Executive Order on Oregon's Wildfire Response Council, March 2019. (Read letter [HERE](#))

catastrophic wildfire pattern." We were very encouraged to read the introduction in the subcommittee's draft recommendations:

“Because the Committee believes wildfire and smoke will remain a reality of life in the Pacific Northwest, the Committee’s work is premised on how to meaningfully prioritize and take actions that reduce the negative impacts fire and smoke can pose to important societal values rather than a binary or zero-sum-game approach that continues to pit wildfire and suppression against one another.”

Yet, despite this encouraging frame, the subcommittee is recommending an ambitious, landscape-scale thinning program that will cost \$4 billion over a number of years. In recent meetings, it has become increasingly clear that the Council has no expectation that taxpayers will pay for this work. Instead, they hope to largely pay for this work by increasing the number of commercial timber sales on public lands under the guise that these logging projects will reduce fire risk. This strategy will fail in its stated goal of protecting Oregonians from wildfire risks, and it will come at a tremendous cost to our forest ecosystems and the communities that depend on them.

We recognize that **non-commercial, ecological thinning in priority areas** (e.g. defensible space directly adjacent to homes and communities) along with prescribed burning in ecologically appropriate settings can help reduce fire risk under certain conditions. However, timber interests often conflate these science-based restoration treatments with commercial-scale logging where older, medium to large trees (which are also the most fire-resistant) are removed and sent to the mill.

The consequences of conflating commercial logging with fire prevention is on full display on our federal lands, where Oregonians are witnessing mature and old-growth forests being logged under the pretext of “fuels reduction” and “ecological restoration.” Commercial-scale thinning projects and the extensive road networks needed to access those lands are degrading habitat for salmon and imperiled wildlife. Scientists have found that these projects increase sediment in nearby waterways,² and may even decrease water levels in rivers and streams already impacted by climate change.³ They have also found that landscape-scale thinning efforts result in significantly higher carbon emissions than fire itself – a finding echoed in the Oregon Global Warming Commission’s recent report to the legislature.⁴

² Rhodes, JJ. 2017. The Watershed Impacts of Forest Treatments to Reduce Fuels and Modify Fire Behavior. (Read study [HERE](#))

³ Perry, TD, JA Jones. 2016. Summer streamflow deficits from regenerating Douglas-r forest in the Pacific Northwest. (Read study [HERE](#))

⁴ Oregon Global Warming Commission Report. 2018. (Read report [HERE](#))

Most importantly, thinning Oregon's vast forestlands is an ineffective and futile strategy to protect people and property from wildfire. Currently, government agencies spend millions of dollars thinning the landscape, yet data from the Forest Service shows less than 1% of thinning treatments encounter wildfire each year.⁵ Even if the area thinned were doubled, the probability of a fire entering a thinned area does not increase markedly. The primary reason is that our forests are vast and it is impossible to accurately predict where a fire will occur during the ~10-20 years when fuels are at their lowest following thinning (see Figure 1 on final page).

21st century wildfires pose unique challenges to our communities, and we have limited time and dollars to spend. To avert another Paradise disaster from happening in Oregon, we ask that you show true leadership by moving Oregon beyond the failed approaches of the past and instead advance realistic, science-based solutions.

2. Proposal to Increase Suppression

The Council has recommended significantly increasing the Oregon Department of Forestry (ODF) suppression budget and intensifying fire suppression across all lands in Oregon.

Aggressive fire exclusion is not only economically unsustainable, it is also physically impossible – especially in the age of climate change where extreme weather conditions drive wildfire behavior.

The Council's recommendations do not honor the wealth of scientific research revealing the vital and essential role of recurring fires in Oregon's forests, as well as the abundant research on the negative ecological and social consequences of the past century's fire suppression policies (see Figure 2 on final page). Federal agencies in recent decades have adopted more progressive fire policies such as expanding the use of prescribed fire and managing wildland fire for ecosystem benefits as described in the National Cohesive Wildland Fire Management Strategy. Yet, the recommendations laid out by the suppression subcommittee distort this strategy by advocating for a single approach: aggressive initial attack firefighting and full suppression across all lands and agencies in Oregon.

A truly science-based and realistic fire management strategy would prepare for opportunities for wildfires to be managed for fuels reduction and ecosystem benefits. However, the Council advocates severe restrictions on managed wildfire on federal lands, proposing that fire use be allowed "only during low-risk wildfire conditions." These limitations put great pressure on federal agencies to aggressively suppress all fires on public forestlands, often to protect corporate timberlands which present significant fire risks. In fact, recent research has found that

⁵ Schoennagel, T, JK Balch, H Brenkert-Smith, PE Dennison, BJ Harvey, MA Krawchuk, N Mietkiewicz, P Morgan, MA Moritz, R Rasker, MG Turner, C Whitlock. 2017. Adapt to wildre in western North American forests as climate changes. (Read study [HERE](#))

private timberlands degraded by industrial logging practices are less resilient to wildfires and more prone to uncharacteristically severe wildfires.⁶

Oregon should lead the way in investing our precious tax dollars into ecologically sound and proven strategies that work with wildfire – rather than endlessly fighting against it.

Our Vision

In 2019, wildfires in Oregon burned roughly a tenth as many acres as 2018. Some would credit thinning and suppression efforts in recent years – but the data confirm what wildfire scientists have been telling us for decades: **large wildfires in the American West are primarily driven by extreme weather conditions, not excessive fuels**. Just as this past summer’s cooler and wetter conditions led to a fairly inactive wildfire season, the hotter and drier conditions of future years will drive an increase in fire activity on the landscape.

Based on this scientific reality, we recommend that the State of Oregon adopt policies focused on **community adaptation and resilience** rather than attempting to control fire behavior across the entire landscape. Below are three recommendations to enhance community resilience in the face of climate-induced increases in wildfires:

1. Provide resources and funding for Oregonians living in fire-prone areas to retrofit their homes and “fire-wise” their communities.

- Research shows that installing fire-resistant roofing, rain gutter guards, and ember-proof vents, combined with maintaining “defensible space” within 60-100 ft of homes, are the best ways to protect homes from wildfire.⁷ By working from the home-out rather than from the backcountry-in, homeowners can dramatically increase the likelihood that their homes survive fire.⁸
- The state should consider fire-wise tax incentives to implement defensible space work directly adjacent to homes and to support home hardening efforts. The state should also create a financial assistance program to help elderly, disabled, and low-income homeowners and renters pay for this important work – a recommendation echoed in the Council’s draft report.
- ODF and the State Fire Marshal’s Office should expand their fire-wise programs that train communities how to develop up-to-date evacuation plans, fire-smart building codes, and defensible space standards.

⁶ Zald, HSJ, CJ Dunn. 2018. Severe weather and intensive forest management increase severity in a multi-ownership landscape. (Read study [HERE](#))

⁷ Quarles, SL, Headwaters Institute. 2018. Building a Wildfire-Resistant Home: Codes and Costs. (Read report [HERE](#))

⁸ Cohen, JD. 2000. Preventing Disaster: Home Ignitability in the Wildland-Urban Interface. (Read study [HERE](#)).
Also: watch Dr. Jack Cohen, Fire Science Researcher with the Forest Service, talk about defensible space [HERE](#)

- To help Oregonians become more resilient to the impacts of wildfire smoke we can invest in public smoke shelters and advanced air filtration systems, and educate vulnerable populations about the risks of smoke and how to minimize exposure.

2. Limit new development in fire-prone areas by modernizing land-use regulations.

- By strengthening land-use regulations where fire risks are greatest, we can greatly diminish the chances of losing homes to wildfires. Our land-use laws currently restrict new development in floodplains due to the risk of flooding – so too should our laws limit the construction of new homes in fire-prone forests and shrublands.
- The Committee should fully explore the land-use recommendations of the Adaptation & Recovery Subcommittee that advise modernizing our land-use regulations to account for fire. Most notable of these recommendations:
 - *“In coordination with Oregon cities and counties, the Land Conservation and Development Commission undertake rulemaking to adopt minimum standards for local governments to plan for wildfire risk.”*
 - *“State agencies... provide technical assistance resources to counties/cities to implement wildfire risk planning, zoning, or development mitigation standards.”*
- New legislation that provides incentives to counties that adopt strict fire-safe zoning measures would greatly reduce risks posed to homeowners by future wildfires. Further incentives should be provided to counties that pass strict fire-safe building codes.

3. Update ODF’s wildfire policies to work with, not against, fire.

- Expanding the use of managed wildfires in the backcountry is not only necessary for maintaining fire-dependent forest ecosystems, but also is the most cost-effective means to reduce fuels on a landscape scale.⁹
- Conducting more prescribed burns in safe weather conditions and in appropriate ecosystems can also help restore forest ecosystems, and may help mitigate the impacts of smoke on local communities.
- Instead of aggressively suppressing all fires on the landscape, firefighters should concentrate their efforts on wildfires that pose direct risks to homes and communities. This strategy minimizes the risks posed to firefighters, lowers the costs passed on to taxpayers, and is the most effective way to protect people and property from fire risks.

4. Require ODF to conduct a carbon accounting for all forest management projects.

- An honest carbon accounting will help elected officials, policymakers, and the general public better understand the carbon consequences of ODF’s forest practices.

⁹ North, MP, SL Stephens, BM Collins, K Agee, G Aplet, JF Franklin, PZ Fulé. 2015. Reform forest fire management Agency incentives undermine policy effectiveness (Read article [HERE](#)).

We strongly support modernizing Oregon’s wildfire policies to prioritize the science-based strategies proven to protect homes and communities while restoring the important role that fire plays in Oregon’s forest ecosystems. We hope you prioritize the Council’s land-use and public health recommendations geared towards community adaptation and resilience and reject it’s logging and suppression recommendations, and we look forward to working with your committee in the coming months.

Thank you for taking on this challenge.

Sincerely,



Firefighters United for Safety,
Ethics and Ecology



SIERRA
CLUB



CCAC

Clackamas Climate
Action Coalition



Center for
Sustainable Economy
Analysis • Solutions • Advocacy



Figure 1

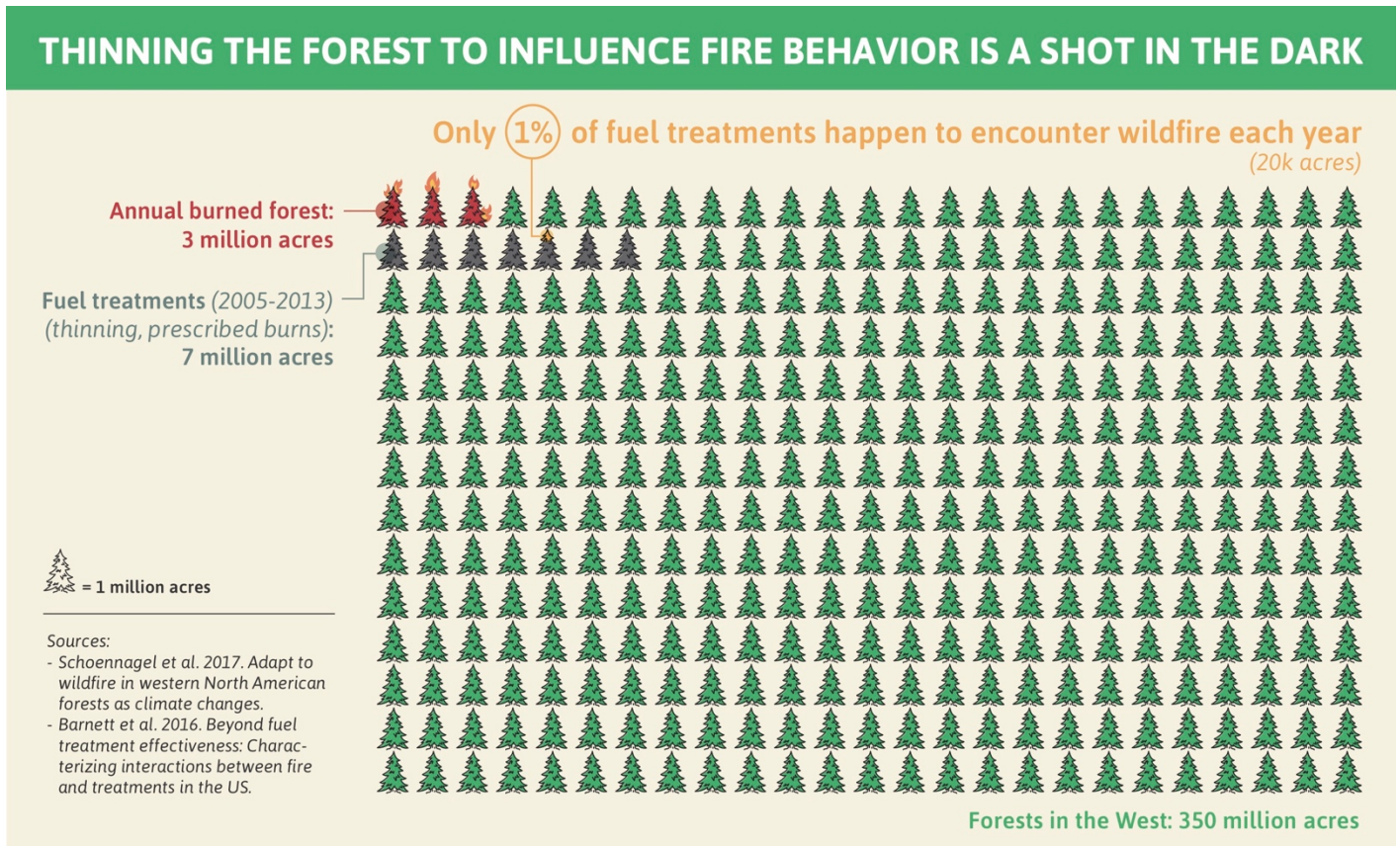


Figure 2

