

February 3, 2020

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

Senator Michael Dembrow
Senator Alan Olsen
Senator Lynn Findley
Senator Arnie Roblan

CC:
Members of the Oregon Senate
Members of the Oregon House of Representatives

Governor Kate Brown
Matt Donegan

Re: Carbon and Wildfire Policy

Members of the Senate Committee on Wildfire Prevention and Recovery and the Senate Committee on Environment and Natural Resources:

Thank you for your public service and for your efforts to craft carbon and wildfire policies that seek to slow down climate change while helping Oregonians adapt to its impacts. The organizations signed onto this letter are encouraged by many of the proposals laid out in recent weeks to develop a new greenhouse gas program (SB 1530 and HB 4159) and address the increasing risks posed by Oregon's wildfires (SB 1514 and 1536); however, we believe that many of the proposals laid out in these bills will fail to accomplish the stated objectives.

We are especially concerned with the proposal to allocate a quarter of Oregon Greenhouse Gas Initiative (OGGI) revenues from the "climate fund" in Senate Bill 1530 to pay for the fuel reduction recommendations laid out by the Governor's Wildfire Response Council. Scientists predict that the coming decades will bring more climate change-driven wildfires in Oregon's forests. Therefore, we must prioritize policies focused on community adaptation rather than futile attempts to modify fuel conditions and control fire behavior across the entire landscape.

We strongly recommend that OGGI funds allocated towards wildfire should prioritize funding adaptation measures that enhance the resilience of our communities to wildfire risks – instead of funding an unprecedented, landscape-scale thinning program throughout Oregon's public forestlands that will not work to keep communities safe.

Here are three reasons we do not support allocating OGGI revenue to fund a landscape-scale thinning program:

1. OGGI investments should be squarely focused on strategies that effectively reduce carbon emissions and help Oregonians adapt to the impacts of climate change. Climate and wildfire scientists agree that large wildfires in Oregon are primarily driven by extreme weather conditions (e.g., high winds, drought, etc), not excessive fuels.¹ Therefore, as climate change brings hotter and drier conditions to portions of our state, we can expect a continued increase in wildfire activity on the landscape.

¹ Keyser, A, A Westerling. 2017. Climate drives inter-annual variability in probability of high severity reoccurrence in the western United States.

Based on this scientific reality, the State should prioritize adaptation strategies that enhance the resilience of Oregon communities rather than futilely attempting to control the behavior of extreme, weather-driven wildfires. Experts have found that the most effective strategies to protect homes and communities are to:

- retrofit homes with fire-resistant materials, and require new homes built in fire prone areas to meet certain standards;
- maintain defensible space within 60-100 ft of structures (i.e. the “Home Ignition Zone”); and
- limit new development in fire prone areas by modernizing land use regulations that take into consideration fire risks and homeowner safety.²

By working from the home-out rather than from the backcountry-in, our state can dramatically decrease the likelihood of losing homes to wildfire. ***We urge you to amend Senate Bill 1530 (OGGI) to explicitly prioritize community adaptation measures over any fuels reduction activities, and that you prohibit OGGI revenue from funding suppression activities.***

2. Thinning Oregon’s vast forestlands is an ineffective strategy to protect people and property from wildfire. Currently, government agencies spend millions of dollars logging to reduce fuels, yet data from the Forest Service shows less than 1% of thinning projects encounter wildfire each year.³ Even if the area thinned were increased dramatically, the probability that a fire will encounter a treated area does not increase markedly, given that our forests are vast, fire is unpredictable, and treatments are only effective for ~10-20 years before vegetation grows back.

We recognize that science-based fuels reduction projects in priority areas 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 types of treatments with commercial-scale logging in backcountry areas where older, fire-resistant trees are removed to pay for project costs.

The Governor’s Wildfire Response Council proposed a landscape-scale fuels reduction program to treat 5.6 million acres over 20 years. This unprecedented program would cost \$4 billion, a sum so large that the state would have to prioritize commercial logging to help foot the bill. Unfortunately, the most economically valuable trees are generally the largest, oldest, most fire-resistant, and most-ecologically important trees, which means economic motivations are incompatible with an effective fuels reduction priority.

We are also concerned by the proposals to expand the role of the Oregon Department of Forestry (ODF) in managing federal public land in Oregon. ODF exists in large part to oversee private industry logging in the state, implementing the weakest standards for industrial logging on the West Coast. Further expansion of ODF to steer management decisions on federal land in Oregon

² Cohen, JD. 2000. Preventing Disaster: Home Ignitability in the Wildland-Urban Interface.

³ 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 wildfire in western North American forests as climate changes.

is likely to increase fire risk, destroy wildlife habitat, and degrade watershed integrity.^{4 5} Furthermore, ODF faces scrutiny over the gross mismanagement of their budget, inadequate planning on state forests, and lack of transparency as recently outlined in a 4-part series by the Oregonian, *Failing Forestry*.⁶

Put simply, funding ODF to oversee forest management on millions of acres will fail in its stated goal of protecting Oregonians from wildfire risks, and will come at a tremendous cost to our forest ecosystems and communities that depend on them.

3. Landscape-scale thinning initiatives can actually make climate change worse by releasing carbon that would otherwise have remained stored in forests for decades or centuries.

Scientists at our state's leading forestry research institution, Oregon State University, and have found that broad-scale thinning programs result in significantly more carbon emissions than non-thinning alternatives.^{7 8} The primary reason that landscape-scale thinning initiatives are so carbon-intensive is that more area is logged than actually burns.⁹ Even if an area did burn, significantly more carbon is released from logging and processing trees than from a wildfire.

The Oregon Global Warming Commission came to the same conclusion in its 2018 report:

There are safety, industry and science – and cultural – reasons that may support... different levels of thinning, often in combination with prescribed fire. At any level above “no thin” however, there are net reductions in the amounts of carbon stored in the forest and a significant delay in recovery of pre-thin carbon levels.¹⁰

Researchers have also found that – despite their impressive smoke plumes – wildfires in Oregon only release a small fraction (5-10%) of the carbon contained in a forest; whereas thinning and logging activities quickly release larger amounts of a forest's stored carbon, especially if trees are turned into short-lived paper or wood products.¹¹

If we hope to avoid catastrophic climate change, we need to sharply reduce fossil fuel emissions while simultaneously drawing down the excess level of carbon already in the atmosphere by better preserving the world's forests.¹² This is particularly relevant to the Pacific Northwest, where scientists have documented some of the most carbon-dense landscapes on the planet.¹³

⁴ Zald, HSJ, CJ Dunn. 2018. Severe fire weather and intensive forest management increase fire severity in a multi-ownership landscape.

⁵ Rhodes, JJ. 2017. The Watershed Impacts of Forest Treatments to Reduce Fuels and Modify Fire Behavior.

⁶ Sickinger, T. 9/28/2019. “Failing forestry.” *The Oregonian/OregonLive*.

⁷ Law, BE, T Hudiburg, S Luysaert. 2013. Thinning effects on forest productivity: Consequences of preserving old forests and mitigating impacts of fire and drought.

⁸ Hudiburg, T, BE Law, C Wirth, S Luysaert. 2011. Regional CO2 implications of forest bioenergy production.

⁹ Law, BE and M Harmon. 2011. Forest sector carbon management, measurement and verification, and discussion of policy related to climate change.

¹⁰ Oregon Global Warming Commission Report. 2018.

¹¹ Law, BE, RH Waring. 2015. Carbon implications of current and future effects of drought, fire and management on Pacific Northwest forests.

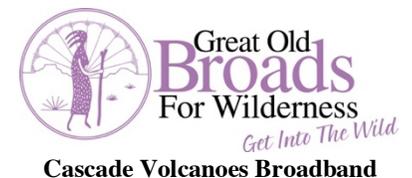
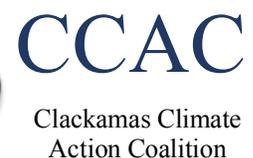
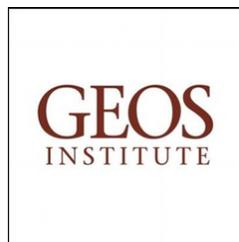
¹² Griscom, BW, et al. 2017. Natural climate solutions.

¹³ Keith, H, BG Mackey, DB Lindenmayer. 2009. Re-evaluation of forest biomass carbon stocks and lessons from the world's most carbon-dense forests.

Researchers have found that we can dramatically increase the amount of carbon stored in Oregon's forestlands by better protecting older forests on public lands, upholding the Northwest Forest Plan, and reducing overall harvest levels from our federal public lands.¹⁴ We can also store more carbon in state and private forests by increasing harvest rotations, encouraging selective logging instead of clearcutting, and expanding protective buffers around rivers and streams.¹⁵

Governor Brown has said, "To keep Oregonians safe and our landscape healthy, we can't run plays from last century's playbook." We couldn't agree more, which is why we ask that you advance 21st century solutions focused on adaptation and climate-resilience, rather than increased logging and fire suppression. Wildfire and climate policy are not easy, which is why we appreciate you giving these issues the attention and time they deserve.

Thank you for all your hard work,



¹⁴ Olga, K, D Dellasala, J Leonard, M Yatskov. 2014. High-Biomass Forests of the Pacific Northwest: Who Manages Them and How Much is Protected?

¹⁵ Law, BE, TW Hudiburg, LT Berner, JJ Kent, PC Buotte, ME Harmon. 2018. Land use strategies to mitigate climate change in carbon dense temperate forests.