

April 7, 2022

US Department of Agriculture, Forest Service
Randy Moore, Forest Service Chief
Meryl Harrell, Deputy Under Secretary for Natural Resources and Environment
Chris French, Deputy Chief for National Forest Systems

US Department of the Interior, Bureau of Land Management
Nada Culver, Deputy Director, Policy and Programs

Re: Wildfires, Communities & Climate - Prioritizing Infrastructure Spending

Dear leaders of the US Forest Service and Bureau of Land Management:

Thank you for your commitment to managing America's national forests and public lands for the benefit of our climate, watersheds, wildlife, and communities. We are advocates for community safety, natural ecosystems on public lands, and wise expenditure of our limited federal dollars. We live throughout the Pacific Northwest, and our friends, families and communities have experienced large, destructive wildfires in 2020 and 2021. We write today to request that your agencies use the legal authorities and direction in the Infrastructure Investment and Jobs Act (IIJA) to invest in science-based wildfire risk management that focuses on community safety and preparedness.

In the 2020 fires in Oregon, we lost thousands of homes and businesses in wind-driven fire storms. The fires burned large areas in our wet forests – west of the Cascades. Many of those fires were ignited by power lines, then driven by extreme winds through and across the landscapes.¹ In 2021, the Bootleg fire burned across four hundred thousand acres, driven by drought and wind. The fire made huge daily runs, burning right through extensive areas that had been thinned.²

The wind- and drought-driven fires of 2020 and 2021 demonstrated that we must reexamine the strategies we have been pursuing over the past decades, and chart a truly new course. We cannot simply say we are making a paradigm shift, *we must actually make one*. As you know, section 40803(a) of the IIJA appropriates \$3.4 billion for wildfire risk reduction in and around public lands. However, even with this amount of money, we cannot expect to manipulate vegetation over space and time across millions of acres of Oregon. In Oregon, we have over 30 million acres of forests, and another 30 million acres of grasslands and shrublands. Even if we had the money to ramp up forest thinning to reduce fuel loads, we don't have the money to maintain it over space and time. And even if we did have endless supplies of money, equipment

¹ <https://www.oregonlive.com/news/2020/09/oregons-historic-wildfires-the-unprecedented-was-predictable.html>

² <https://lpfw.org/oregons-bootleg-fire-grew-rapidly-in-areas-subject-to-logging-and-other-management-activities/>

and labor, thinning forests is not reducing fire risk to communities, keeping homes from burning, reducing the amount of smoke or reducing the firefighting burden.

In the context of what is actually happening here in Oregon, we have reviewed the Forest Service's 10-year wildfire strategy, and we agree with the experts from Oregon State University and the Rocky Mountain Research Station who recently stated that:

“In the old framing, public agencies bear the primary responsibility for managing and mitigating cross-boundary fire risk and protecting our communities, with their efforts focused on prevention, fuel reduction and suppression,” Dunn said. “This has been the dominant management approach of years past, *which is failing us.*” (Dunning et al 2022).³

The IJA authorizes restoration treatments of federal land that has been identified as having “a very high wildfire hazard potential” with the intention to “improve the Fire Regime Condition Class” (FRCC) on these lands. We are familiar with the FRCC and find it to be a very coarse, unhelpful screen of what land might need attention. The FRCC is outdated and is not suited to support decisions in the face of wind- and drought-driven fires we are living with here in Oregon.

For example, in Oregon the 2020 fires burned hundreds of thousands of acres in the Western Cascades that are not even registering as risks in the FRCC maps. We also see that many forest lands that are *far away from homes and communities* show up as very high wildfire potential. The FRCC is not a helpful tool for prioritization of spending or protection of homes and communities in a situation where wind and drought, not vegetation conditions, are the primary forces driving big fires. Similarly, according to Dr. Dunning and his team, the common narrative of a destructive wildfire igniting on remote public land before spreading to threaten communities is incorrect. The team's study, which looked at more than 22,000 fires, found that those crossing jurisdictional boundaries are primarily caused by people on private property. The team found that ignitions on Forest Service lands accounted for fewer than 25% of the most destructive wildfires – ones that resulted in the loss of more than 50 structures. This led one team member to advise how to prioritize the work as follows:

“A substantial portion of the wildfire problem is a community destruction problem,” added Michael Caggiano of Colorado State. “The Forest Service can contribute to an advisory or facilitation role to address the home ignition zone, including fire resistant design and zoning, and fuels management on private lands, but states, local government and homeowners are better positioned than the USFS to manage those components of wildfire risk.”

Given that top forest scientists have found that thinning forests far from homes does little or nothing to protect at-risk homes and communities from wildfire in extreme conditions, we share the following series of comments and recommendations for your consideration. Additionally, we

³ <https://today.oregonstate.edu/news/osu-research-suggests-forest-service-lands-not-main-source-wildfires-affecting-communities>

would like to call your attention to the established and growing body of science that demonstrates that forest thinning and landscape manipulation results in more carbon emissions than fire itself.

Comments

- **Collaborative Groups Are Operating in the Backcountry.** The IIJA proposes to increase funding for the Collaborative Landscape Forest Restoration Program (CLFRP). Many of us have participated in collaborative groups throughout Oregon over the past two decades, and in our experience these groups, at best, are *temporarily altering the vegetative conditions in patches of forests* far removed from homes and communities. More funding for these efforts is not a new approach, it is merely ramping up the same unsuccessful strategies. A continued focus on fuel reduction far from homes and communities will be ineffective at reducing fire risk to these communities. Further, these collaborative groups have been doing a poor job of assessing the impacts of their projects on wildlife, water, road density and carbon storage.
- **Training the Wildfire Workforce Corps.** The IIJA proposes to fund training, via fire response planning, for fire suppression and landscape-scale thinning. We would like more details and specifics here. A number of us were involved in the passage of Oregon's SB 762, which also contained provisions for training and planning. We strongly support the work of organizations like the Northwest Youth Corps, which is focused on reducing fire risk near homes and communities. We need more of this.
- **Mechanical Thinning & Fuel Breaks.** The IIJA proposes to increase funding for mechanical thinning and fuel break creation at a large scale. We are very concerned that these expenditures will not only be ineffective, but will also do more harm to the landscape. First, the 2021 Bootleg fire in Oregon - and many fires in California - have shown the limited effectiveness of fuel breaks and thinning projects under increasingly occurring extreme weather conditions. All of these fires had extensive fuel breaks and thinning within their perimeters before they burned, yet the fire didn't overlap with all of those areas. Second, in 5 years, the funding will run out and the areas we have cut will already be growing back. Rather than funding these more remote activities, we need to focus our activities within a ¼ mile of census-designated communities and invest in addressing risks posed by private landowners.
- **Wildland Urban Interface.** The IIJA uses a definition of the Wildland Urban Interface that is far too broad, not prioritized, and unhelpful for spending funds in a way that will make a difference over space and time. Oregon's SB 762 set up a rulemaking process to further refine the definition of WUI and establish a process for prioritization of projects to be funded. We would like to see Oregon's work used as a model to help prioritize funding under IIJA. We do not want to see money wasted in a futile attempt to manage vegetation far from homes and communities.

Expert Recommendations

We join with the experts in recommending focused investments on the science-based strategies that are proven to protect people and property from wildfire risks and help them be prepared for future fires. To ensure the goals of the legislation are met and that funding is allocated to activities and strategies that have been proven to be most effective, we urge you to focus investments under section 40803 of the IJA as follows:

- Help communities prepare for fire by aiding in development of wildfire defense plans that improve evacuations and access for first responders, and improve emergency radio communications across departments and agencies,
- Ensure better coordination between all federal authorities and programs to protect communities from wildfires,
- Prioritize creation of smoke shelters and assist people with preparing for smoke,
- Help vulnerable populations, including the elderly, those with disabilities, homeless, and low-income communities in wildfire hazard areas, and communities recently impacted by a major wildfire,
- Support the use of prescribed fire to restore natural fire regimes and native vegetation, including cultural fire use with Indigenous people and Tribal government on their ancestral lands. Focus on carrying out prescribed fire in appropriate areas, especially within the home defense zone, so that ecological impacts can be avoided and community safety maximized. Ensure work is conducted in accordance with state smoke management programs to minimize impacts to communities and protect vulnerable people,
- Direct funding toward a jobs program that is focused on hardening homes, removing roads from drinking watersheds and other sensitive areas that can lead to human ignitions, replacing culverts to protect against erosion, and other activities that prioritize community protection while limiting or remedying human impacts to our forests,
- Ensure that assistance for home hardening and creating and maintaining defensible space within 60-100 ft of structures is explicitly funded through the Wildfire Defense Grant Program or other authorized programs.

Sideboards to Protect Older Forests, Carbon Storage, Wildlife and Water

We draw your attention to the language in the IIJA that defines important sideboards for funding and implementation. Per the IIJA, prioritized projects must:

- Be vetted through a full NEPA process and “reduce the likelihood of experiencing uncharacteristically severe effects from a potential wildfire by focusing on areas strategically important for reducing the risks associated with wildfires;
- Maximize the retention of large trees, as appropriate for the forest type, to the extent that the trees promote fire-resilient stands;
- Not include the establishment of permanent roads, and commit funding to decommissioning of all “temporary” roads.

These sideboards must be followed in order to prevent conflict, degradation of the forests we seek to protect, and delays in implementation. In particular, retention of large trees - often the most fire-resilient in a stand and important for addressing the climate crisis as discussed below - must be prioritized.

Forest Carbon Management

A well-established and growing body of science is demonstrating that there are significant carbon losses flowing from efforts to clear vegetation across broad landscapes, and that these losses far exceed those from wildfire. Recently, Drs. Beverly Law and Tara Hudiburg prepared a synthesis of this body of scientific evidence, which states:

The amount of carbon removed by thinning is much larger than the amount that might be saved from being burned in a fire, and far more area is harvested than would actually burn (Mitchell et al. 2009, Rhodes et al. 2009, Law & Harmon 2011, Campbell et al. 2011). Most analyses of mid to long-term thinning impacts on forest structure and carbon storage show there is a multi-decadal biomass carbon deficit following moderate to heavy thinning (Zhou et al. 2013). A thinning study in a young ponderosa pine plantation vulnerable to drought in Idaho found that removal of 40% of the live biomass from the forest would subsequently release about 60% of that carbon over the next 30 years (Stenzel et al. 2021). On the other hand, a study of combustion rates in a California wildfire found carbon emissions were very low overall at the stand- (0.1-3.2%) and landscape-level (0.6-1.8%) because larger trees with low combustion rates comprise the majority of biomass and high severity fire patches are less than half of the area burned. (Harmon et al. 2022).

As to the effectiveness and likelihood that thinning might have an impact on fire behavior, a multi-year study of forest treatments like thinning and prescribed fire across the western US found *that only 1% of those treatments experience wildfire each year. The potential effectiveness of treatments lasts only 10-20 years,*

diminishing annually and then expiring. (Campbell et al. 2011, Schoennagel et al. 2017). In other words, the odds that a particular thinned and/or burned patch of forest will burn in a fire is very low, and in extreme weather, wildfire still carries through, over and around thinned patches. On the other hand, while fire can kill trees, most of the carbon remains in the forest as dead wood and it takes decades to centuries to decompose that wood. Less than 10% of the total ecosystem carbon in live and dead trees, litter, and soils combined has been found to enter the atmosphere as carbon dioxide in Pacific Northwest forest fires (Campbell et al. 2011; Law & Waring 2015).

We ask that you review the synthesis in its entirety and direct Forest Supervisors and field staff to take this body of knowledge and scientific findings into account for all projects funded with IIJA funds.

In addition, Congress directed that IIJA implementation *must protect fire resilient forests*. Specifically, section 40803(g)(6) requires that funding be prioritized for projects that:

fully maintain or contribute toward the restoration of the structure and composition of old growth stands consistent with the characteristics of that forest type, taking into account the contribution of the old growth stand to landscape fire adaption and watershed health, unless the old growth stand is part of a science-based ecological restoration project authorized by the Secretary concerned that meets applicable protection and old growth enhancement objectives, as determined by the Secretary concerned.

Through this language, Congress recognized the importance of protecting and restoring old growth stands to enhance climate action, biodiversity, and fire resilience. The science is well-settled on the fact that large, mature, and older trees and stands are the most resilient to both fire and a changing climate, and are essential for carbon storage in the face of today's climate emergency (Mildrexler et al., 2020). Top scientists have also highlighted the triple benefits for carbon, water and wildlife of protecting our most carbon dense forests.

In sum, we ask that you ensure that implementation of the wildfire provisions in the IIJA focus first and foremost on home defense and community preparedness. We know what actions are needed to protect communities from weather-driven fires, especially fires which are started in and around towns and communities like those we experienced in 2020 and 2021, started by power lines, accidents, or arson. We stand ready to help you and your agencies make decisions that are good for Oregon and our forests and that keep our homes and communities safe. Let's get to work.

Sincerely,

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Patricia Hine, President, 350 Eugene
Debby Garman, Team Lead, 350 Washington County

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Cara Christofferson, Forest Policy & Advocacy Coordinator, Bark
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cc: Oregon Congressional Delegation