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Date: March 8, 2019
Re: Governor Brown's Executive Order on Oregon's Wildfire Response Council (OR 19-01)

Our organizations (listed below) are writing to share our thoughts as you convene the Governor's Wildfire Council and its subcommittees, and to express our interest in participating in it. Oregon and its federal partners have limited dollars to spend on wildfire and so we must spend them wisely. We have many homes in firehedges and smoke is impacting our communities. We have important science-based solutions to share to protect homes and communities while restoring and protecting Oregon's natural landscapes and diverse watersheds. We also see great opportunities to shift the public's understanding of how best to coexist with wildfire to meet the challenges ahead. We would bring deep knowledge and connections to many people directly affected by wildfire. And we believe there is an effective and science-based way to deal with these vital issues that we would like to share with the Governor's Wildfire Council.

Our organizations have developed and submit for your consideration, a *Community Protection Alternative*¹, summarized herein and attached, including supporting weblinks. We stress that community planning assistance is a first priority as it is widely recognized as the most effective means for reducing wildfire risks to communities². We request that you add appropriate expertise in defensible space/wildfire risk planning, climate change, and forest-fire ecology and that you create a transparent process for the public and scientists to contribute to the Council's mandate.

The *Community Protection Alternative* emphasizes:

- Needed policies to immediately prepare homes to reduce ignitability while discouraging new development in naturally fire-prone areas. Homes that are easily ignited by embers are responsible for urban conflagrations like those in Santa Rosa and Paradise, California and this risk can be greatly reduced by working from the home-outward instead of the working to reduce risks from wildlands-inward. Therefore, we recommend that the Council make community protection and health and safety its overriding objectives and include additional expertise as noted.
- Targeted thinning and prescribed fire treatments in strategic locations immediately surrounding communities on both public and private lands within a ¼ of a mile of residential lands.
- Specific measures to prepare communities for smoke, including improvements to air quality, creation of fire/smoke shelters, tax rebates for HEPA filters and HVAC systems, and aid to the most health-vulnerable segments of society by working with health care providers. This is needed because fire behavior and smoke are far more complicated than has been generally realized.

¹<https://www.dropbox.com/s/0rh5f0qf3i1ytwf/Forest%2C%20Fire%20%26%20Smoke%20Policy.pdf?dl=0>

²see <https://headwaterseconomics.org/wildfire/solutions/cpaw/>; <https://bit.ly/2tgfAfr>

- Working with both managed wildland fires and prescribed burns under safe conditions for ecosystem benefits as the most cost effective and natural way to reduce fuels in forest systems. Fire is inevitable in dry forests of the West, despite all efforts to stop it. Aggressive suppression results in significant environment harm and has limited effect on large fires governed mostly by extreme fire weather.
- A fully integrated and rapid transition to clean, renewable energy in conjunction with forestry reforms that lead to more carbon stored in ecosystems. We note that fire may continue to increase in extent due to climate change, although recent research shows carbon dense older forests of the Pacific Coast and western Cascades are the least vulnerable forests to drought and wildfire compared to other forests in western states³.
- Prohibiting practices that can increase unnatural wildfire risks such as clearcut/modified clearcutting, postfire logging, removal of large fire-resistant trees, excessive opening of forest canopies, and commercial operations that produce excess slash that is highly flammable, expensive and most often not feasible to remove⁴. Importantly, managers must realize that the probability of thinned sites encountering a fire when fuels are lowest is especially low (1% on average)⁵ and that thinning at landscape scales emits far more carbon pollution than forest fires⁶. This means thinning as currently conceived by managers and decision makers is a large investment in dollars with extremely low odds of success, high impacts to the environment, and the climate. A more effective and efficient use of dollars is home defense.

The following summarizes our concerns with what we understand to be the Governor's current approach to addressing wildfires and community safety.

1. Attempting to put out all fires is neither feasible nor desirable and it misleads the public. Both the Governor and the Rogue-Siskiyou Forest Supervisor have stated their intentions to put out every natural fire, suggesting a level of control that has never been achieved and is simply not feasible. Every fire suppressed is a fire delayed. Fire is a necessary and desirable ecological disturbance agent in Oregon's forests and policies are needed to manage fire for ecosystem benefits under safe conditions. This means responsibly suppressing the fires or portions of them that are actually threatening communities and infrastructure, while working with fire for ecosystem benefits in the backcountry. Unrealistic suppression policies often lead to ineffective suppression actions with a low probability of success, severe ecological damage, substantial public expenditures, and extreme risks to firefighters. It is irresponsible to subject fire suppression personnel to high levels of risk defending unprepared homes, flammable tree plantations, private industrial timberland, and federal forests in the backcountry. The safety of homes, communities and firefighting personnel should be the utmost priority. The Council should adopt the National Cohesive

³<https://www.pnas.org/content/115/14/3663>; <https://onlinelibrary.wiley.com/doi/full/10.1111/gcb.14490>

⁴<https://www.forestlegacies.org/programs/fire-ecology/1380-a-new-climate-and-human-influenced-wildfire-era-for-western-forests>; <https://www.forestlegacies.org/programs/fire-ecology/1410-everything-you-wanted-to-know-about-wildland-fires-in-forests-but-were-afraid-to-ask>

⁵ <https://www.pnas.org/content/114/18/4582>

⁶ <https://www.keeporegoncool.org/climate-conversation-blog/2018/12/19/oregon-global-warming-commission-reports-highlight-oregons-climate-change-challenges>

Wildland Fire Strategy of the US Forest Service⁷ for ways to work proactively with fire for ecosystem benefits and suppression for home safety.

Industrial-scale logging has created flammable landscapes that endanger lives. Current timber and fuel management can increase fire intensity of future wildfires as noted by forest researchers, including those from Oregon State University⁸. Fire risks are greatest where natural, older fire-resistant forests are replaced by flammable tree plantations through clearcutting and postfire logging operations, treatments are not adequately maintained and followed with prescribed fire, and policies are promoted that remove excessive amounts of large trees and canopy cover. We are particularly concerned by proposals to increase logging in areas normally protected from logging, such as national monuments, roadless areas, mature and old-growth forests, and riparian areas as proposed by the Rogue Basin Forest Partnership. Many of these impacts, like those related to public safety, can be avoided by focusing thinning/prescribed fire on the millions of acres of existing plantations while protecting areas of conservation importance from logging.

Climate change is contributing to more extreme fire weather that will override fuel reduction efforts. Recent studies have demonstrated the increasing role that climate change is having on extreme fire weather (uncontrollable fires burning during hot, dry, and windy conditions)⁹. This will only worsen in places as emissions from fossil fuels and logging continue to rise. In fact, logging is the leading cause of emissions in Oregon and on average contributes ~7-times more emissions than wildland fires, as recognized by the Oregon Global Warming Commission's recent report to the Governor and researchers at Oregon State University¹⁰. Thus, it is prudent to address the root of the problem and in Oregon that means transitioning quickly to clean, renewable energy and storing more carbon in forests¹⁰.

Certain interest groups are misleading the public. It is no secret that the interests that promote and/or conduct timber sales at taxpayer expense are pushing for the expansion of logging, especially on federal lands. If enacted, cumulative impacts are expected to water quality and fisheries, more severe fires, loss of older forests, and decline of imperiled species (e.g., spotted owl, salmon) that depend on intact areas. Many so-called collaborative groups use misleading euphemisms to describe fire remediation activities like “ecological thinning,” “active management,” and “restoration.” Such labels mask the true impacts of these actions. In fact, some proposals that rely on expansive logging purport to reduce wildfire risk to a broad suite of ecosystem values by 70 percent while also claiming to protect communities and eliminate smoke. However, these unsubstantiated claims are based on flawed modeling assumptions that have not been verified by scientists and can result in setting unrealistic expectations for the Governors' office. Science and on-the-ground experience have shown that the most effective

⁷<https://www.fs.fed.us/restoration/cohesivestrategy.shtml>

⁸<https://www.emwh.org/issues/habitat/Severe%20fire%20weather%20and%20intensive%20forest%20management%20increase%20fire%20severity%20in%20a%20multi-ownership%20landscape.pdf>;
<https://esajournals.onlinelibrary.wiley.com/doi/full/10.1002/ecs2.1492>

⁹<https://www.pnas.org/content/early/2016/10/05/1607171113>

¹⁰<https://www.keeporegoncool.org/climate-conversation-blog/2018/12/19/oregon-global-warming-commission-reports-highlight-oregons-climate-change-challenges>; <https://www.pnas.org/content/115/14/3663>

way to protect structures, in this case, is through defensible space, not logging away from homes¹¹. Investments in home and firefighter protections will result in much greater chances of success than the highly improbable odds of thinning in the backcountry as noted.

Address the particulate-matter pollution that can actually be addressed. In inversion-prone airsheds such as the Rogue Valley, fine particulate matter (<2.5 microns) pollution will accumulate as long as we burn fossil fuels and wood in stoves. While some emissions come from wildfires, most is from other sources. Since large wildfires cannot be effectively controlled to reduce the smoke caused by them (and also since poor air quality episodes in the Rogue Valley are attributable to events as far away as forest fires in British Columbia and burning wheat fields in northcentral Oregon), to improve public health, it is all the more prudent for government to more aggressively address causes of PM 2.5 pollution that can be effectively mitigated: residential wood stove use, agricultural sources (dust, etc.), industrial (smokestack) emissions, and motorized vehicles.

In closing, we are concerned that the predominant policies and proposals for addressing wildfire are built on a house-of-cards assumption that logging can slow or stop fires and smoke, and even more suppression is necessary. Unfortunately, the fire situation in Oregon and throughout the West has become highly politicized at the expense of community and firefighter safety and taxpayer expense. This is especially pertinent given the recent article in the Oregonian titled, “*Polluted by Money*” that demonstrates disproportional influence of corporations, specifically the timber industry in state policy.

One or more of our organizations would be interested in participating at the subcommittee level in this process to help ensure more inclusive representation of the Council’s task.

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¹¹Jack Cohen on defensible space https://www.youtube.com/watch?v=vL_syp1ZScM