



November 15, 2018

Senator Lisa Murkowski, Chairman
Senate Energy & Natural Resources
Committee
304 Dirksen Senate Office Building
Washington, DC 20510

Senator Maria Cantwell, Ranking Member
Senate Energy & Natural Resources
Committee
304 Dirksen Senate Office Building
Washington, DC 20510

Congressman Rob Bishop, Chairman
House Natural Resources Committee
1324 Longworth House Office Building
Washington, DC 20515

Congressman Raul Grijalva, Ranking
Member
House Natural Resources Committee
1324 Longworth House Office Building
Washington, DC 20515

Dear Chairman Murkowski and Bishop and Ranking Member Cantwell and Grijalva:

In April 2016 and July 2017, AFRC submitted letters to the Senate Energy and Natural Resources Committee expressing concerns with the Oregon Wildlands Act and instead called for bipartisan, comprehensive forestry legislation to help address rural Oregon's economic, social, and ecological crises. Our commitment to compromise and finding realistic, implementable solutions to public land management changes has not changed.

However, the condition of Oregon's dynamic Federal forests and policy direction for managing these forests *have changed* since 2016/2017. As the Congress considers legislative proposals implicating Federal forests in Oregon – such as S. 1548, the Oregon Wildlands Act – we are writing to provide you with additional information, details, and concerns related to wildfire and public health, Western Oregon Resource Management Plans, and opportunities for bipartisan, comprehensive forestry legislation.

Wildfire and Public Health

Oregonians are still recovering from a severe wildfire year. According to the Oregon Department of Forestry, 2,019 wildfires burned approximately 857,000 acres in the state. This equates to 1,300 square miles, or roughly the size of Rhode Island. More than 80 structures were lost, including 10 primary residences while thousands of Oregonians were evacuated from their homes and businesses. Although the Pacific Northwest has traditionally enjoyed some of the best summer weather in the nation, wildfires and toxic smoke are having a dramatic impact on Oregonians' way of life.

5100 S.W. Macadam Avenue, Suite 350
Portland, Oregon 97239
Tel. (503) 222-9505 • Fax (503) 222-3255

Total suppression costs topped \$500 million for the year, an all-time record. Yet, studies suggest the *actual* total economic impact of wildfires can be 10 times the cost of suppression. In other words, the true cost of 2018 wildfires to Oregon’s communities, businesses, natural resources, and wildlife could be as high as \$5 billion.¹

This includes wildfire impacts to the recreation and tourism economies. According to a 2017 Travel Oregon report, Oregon’s wildfires and smoke reduced visitor spending by \$51.5 million, local and state tax receipts by \$368,000 and \$1.5 million respectively, and worker paychecks by \$16 million. Wildfires led to curtailment of numerous sporting, educational, and cultural events across the state.²

For long stretches of the summer, Oregonians and those living in the Pacific Northwest suffered from some of the worst air quality on the planet. For example, in August, Southwest Oregon residents were regularly exposed to air quality index levels exceeding 190 (when air quality levels in Beijing, China averaged 61).³ The Environmental Protection Agency considers an air quality index value over 100 as “unhealthy” for sensitive groups such as children and senior citizens. An air quality index over 150 is considered “dangerous” for everyone.

Fortunately, mega-fires, toxic smoke, and massive carbon emissions from wildfires do not have to be the new Oregon normal. The Congress has provided Federal land managers with management tools (pre-commercial thinning, thinning, logging, prescribed burning, etc.) to help reduce fuel loads that drive larger, hotter, and more intense wildfires. When effectively utilized, active management tools can and do improve forest health and resiliency to fire and drought; protect homes and communities within the Wildland Urban Interface; and maintain forest access and infrastructure critical to firefighters, first responders, and the general public.

Although AFRC understands and appreciates the *intent* of the proposal to “protect” iconic natural Oregon treasures, the *practical* impact of legislation is likely to prohibit, limit, or delay the use of these active management tools – to say nothing of the change in suppression strategies and tactics within legislatively designated conservation areas. As such, S. 1548 could impede commonsense efforts to reduce the risk of wildfire and smoke in Oregon. For these reasons, AFRC strongly supports *more* active management on *more* at-risk Federal acres– not less as envisioned under the Oregon Wildlands Act.

Western Oregon Resource Management Plans

We are concerned that S. 1548 seeks to make legislative changes to Federal boundaries and designations in Western Oregon in a vacuum and without context. Like Oregon’s forests, *policy* directing management of Western Oregon forests, specifically lands managed under the O&C Act (O&C Lands), has changed since AFRC submitted comments on the Oregon Wildlands Act in previous years. Below is important background to consider.

¹ Oregon Department of Forestry End of Fire Season Update – November 1, 2018. Email from Doug Grafe, Chief Fire Protection, ODF.

² “The Impacts of the 2017 Wildfires on Oregon’s Travel and Tourism Industry.” Travel Oregon. 16 July 2018.

³ “How Air in the Pacific Northwest Became Dirtier Than Beijing’s.” Wall Street Journal. 29 August 2018. Found at: <https://www.wsj.com/articles/as-wildfires-burn-miles-away-smog-blankets-the-northwest-1535535001>

The Bureau of Land Management (BLM) manages approximately 2.2 million acres of statutorily unique O&C Lands in Western Oregon. Federal law requires all O&C Lands to be managed for permanent, sustained yield timber production—a practice that harvests only so much timber as the land can support on an ongoing basis. For three decades, the O&C Lands have been at the center of some of the most intense public land controversies in the state.

In 1994, the BLM adopted new management plans developed under the umbrella of the Northwest Forest Plan. The number of acres available for permanent timber production dropped to 691,000 acres, or 31 percent of the total land base. In 2016, the BLM again revised its plans further restricting the number of acres available for permanent timber production. This flawed plan is being litigated in Federal court by county, environmental, and industry interests. Today, less than 470,000 acres of the O&C Lands – which represents 19 percent of the land base – are *potentially* available for sustained-yield timber production *at some point in the future*. To be clear, only a tiny fraction of these lands are harvested and replanted each year.

Practically speaking, not even all of these acres are available for management due to wildlife and operational factors. Of the 470,000 acres in the “harvest land base,” 172,000 acres (37%) are designated as spotted owl critical habitat, further reducing BLM’s ability to productively manage the O&C Lands. In fact, in Fiscal Year 2018, the BLM sold 175.3 million board feet of timber, less than 15 percent of annual forest growth and nearly 30 million board feet of timber *less* than the agency’s annual target.

Thus, after all set-aside overlays are subtracted, less than 300,000 acres of the 2.2 million acres of statutorily unique O&C Lands – **or, approximately 14 percent** – are available for sustained-yield timber production. These calculations do not include the recent 48,000-acre expansion of the Cascade-Siskiyou National Monument by then-President Obama in January 2017 that is currently being litigated in three separate lawsuits, which affects an additional 40,000 acres of O&C Lands.

Again, AFRC understands and appreciates the *intent* of the proposal. However, when the proposal is placed within the context of the significant policy changes that have occurred in Western Oregon since 2016, it is difficult to justify permanent, legislative changes to more than 100,000 acres of Federal land that would prohibit, limit, or delay active forest management in Western Oregon under flawed, controversial Resource Management Plans – including thousands of acres designated specifically for timber harvests.

A Bipartisan, Comprehensive Solution

For the above reasons, we strongly encourage the Congress and Oregon Delegation to avoid one-sided proposals to set-aside more lands in favor of a bipartisan, comprehensive legislative solution to Oregon’s economic, social, and ecological crises.

Oregonians have made significant progress in working together in good faith to find balanced solutions to complex natural resources challenges. Members of the Oregon Delegation, on both sides of the aisle, have introduced legislation that would tackle these complex issues while also bringing diverse interests together. While AFRC has not been able to support all these

proposals, we and our members will give any serious proposal our diligent consideration. We are committed to the long-term health and vitality of our rural communities and forests. The growing urban-rural divide can and must be bridged. But it can only be bridged when all interests have a voice and a comprehensive solution is on the table. We urge the Committee and Delegation to start this conversation in earnest.

Respectfully,

A handwritten signature in black ink, appearing to read "Travis Joseph". The signature is written in a cursive, flowing style with a large initial "T".

Travis Joseph
President
American Forest Resource Council

cc: Oregon Congressional Delegation