Dear House Committee on Oversight and Reform,

In the aftermath of historic fire seasons, communities around the Pacific Northwest are as concerned as anyone about being prepared for future fires, and how nearby public lands and other forests are managed. In the oversight hearing held March 16, 2022, the US Forest Service Chief Randy Moore testified that the Forest Service's job is to sustain healthy landscapes. Yet, the Forest Service frequently authorizes post-fire logging, which general scientific consensus acknowledges is ecologically harmful. As this Oversight Subcommittee evaluates forest and fire management, it must consider the role of post-fire management as well.

This is why members of the Wildfire Working Group of the Pacific Northwest Forest Climate Alliance - which includes representatives from organizations like the Sierra Club, Bark, Firefighters United for Safety Ethics and Ecology, Cascadia Wildlands, Forest Web, Oregon Wild, and others - developed and is submitting the attached fact sheet and case study highlighting some of the key problems with post-fire forest management.

We ask that you include this email and the two attachments into the record for this oversight hearing.

Thank you in advance for giving this the attention it deserves.

Regards,

Chandra LeGue (she/her)
Western Oregon Field Coordinator
Oregon Wild

# Post-fire forest management on public lands:
## Issues and case studies to inform the Senate Oversight Subcommittee on Environment

### March 21, 2022

In the aftermath of historic fire seasons, communities around the Pacific Northwest are as concerned as anyone about being prepared for future fires, and how nearby public lands and other forests are managed. **In the oversight hearing held March 16, 2022,** the US Forest Service Chief Randy Moore testified that the Forest Service's job is to sustain healthy landscapes. Yet, the Forest Service frequently authorizes post-fire logging, which general scientific consensus acknowledges is ecologically harmful. **As this Oversight Subcommittee evaluates forest and fire management, it must consider the role of post-fire management as well.**

As communities across the Pacific Northwest continue to pick up the pieces from past fire seasons and do their best to prepare for future fires, we are devastated to see federal land managers inflicting lasting damage on our forests and forest-dependent communities with widespread, heavy-handed, and, in some cases, illegal post-fire logging. The impacts of these actions include harming forest health, degrading our water supplies, increasing fire danger for nearby communities, and setting back the clock on natural post-fire forest recovery. In order for our communities to thrive in a future of climate-driven wildfires, federal agencies must change course. Rather than pouring funding into the destruction of fire-impacted forests, federal agencies must allow forests to recover naturally and focus investments on community preparedness and adaptation to fires, along with restoration projects that mitigate the damage caused by fire suppression such as storm-proofing roads, preventing erosion, and removing invasive weeds.

### Key Issues with Post-Fire Logging

- **Post-fire logging undercuts forest recovery.—** Post-fire logging sets back the clock on forest rejuvenation by disrupting sensitive soils, destroying important habitat, killing emerging native vegetation, and removing many remaining living legacy trees[1]. While post-fire logging is often advertised as reforestation, from an ecological standpoint the process is best compared to deforestation. Post-fire logging most often removes biological legacies (e.g., snags and native shrubs that are vital to wildlife) and replaces them with a more simplified variety of young trees. The process also often involves road building and the introduction of non-native species, and the resulting forests are less resilient and less able to withstand future fires. Even severely burned post-fire forests do not need to be logged for restoration, because fire itself is a regenerative agent.

- **Post-fire forests are critical habitat.** Fire helps rejuvenate forests by creating a diversity of forest structures like standing dead trees (snags) and sunny openings, which provide unique habitat structures and opportunities for growth of diverse plants that provide seeds, berries, nectar, pollen, and palatable forage for a wide variety of wildlife. Many species depend on the

[1] Beschta RL, et al. 1995. Wildfire and Salvage Logging: recommendations for ecologically sound post-fire salvage logging and other post-fire treatments on Federal lands in the West. Corvallis, OR: Oregon State University.

Beschta, R.L., et al. 2004. Postfire management on forested public lands of the western United States. Conservation Biology. 18(4): 957–967.

Lindenmayer, D.B., et al. 2004. Salvage harvesting policies after natural disturbance. Science. 303(5662): 1303–1303.

unique forest habitat created by fire, even in the most severely burned forests[2].

- **Post-fire logging degrades water quality and harms habitat for aquatic species**[3]. Post-fire logging and associated road building harms water quality by loosening sensitive soils, increasing the frequency of erosive high flows in wet seasons, elevating landslide risk on steep slopes, removing logs that would otherwise serve as natural "check-dams" that trap and store sediment, and increasing soil runoff into nearby waterways. Due to these impacts, logging in fire-affected landscapes is a force multiplier of sedimentation in streams and creates water quality issues that impact aquatic species and the human communities who rely on forested watersheds[4].

- **To address the climate crisis, we must protect our fire impacted forests.** Forests of the Pacific Northwest are globally significant for their ability to sequester carbon and keep it safely stored for centuries—but only if protected from aggressive logging[5]. Post-fire logging projects result in more carbon emissions than forests allowed to recover naturally after wildfires. Wildfire emits a surprisingly small fraction of forest carbon to the atmosphere.[6] Even severe wildfires emit less carbon than commercial thinning projects of the same size[7].

- **Post-fire logging elevates future fire risk.** Clearcutting old, fire-resilient trees and replacing them with uniform seedlings results in the creation of highly flammable "plantations" that are likely

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[2] DellaSala, Dominick A., et al. 2015. Flight of the Phoenix: Coexisting with Mixed-Severity Fires. Chapter 13 in The Ecological Importance of Mixed-Severity Fires: Nature's Phoenix. Edited by Dominick A. DellaSala, and Chad T. Hanson. 2015. Published by Elsevier Inc., New York, NY, 450 p., ISBN 978-0-12-802749-3

[3] James R. Karr, et al. 2004. The Effects of Postfire Salvage Logging on Aquatic Ecosystems in the American West, *BioScience*, Volume 54, Issue 11, Pages 1029–1033.

Reeves, Gordon & Bisson, Peter & Rieman, Bruce & Benda, Lee. 2006. Postfire Logging in Riparian Areas. Conservation biology: The Journal of the Society for Conservation Biology. 20. 994-1004. 10.1111/j.1523-1739.2006.00502.x.

[4] Waters TF. 1995. Sediment in Streams: Sources, Biological Effects and Control. Bethesda (MD): American Fisheries Society. Monograph 7.

[5] Oregon State University. "Some forests crucial for climate change mitigation, biodiversity." ScienceDaily. ScienceDaily, 9 December 2019.
And, see page 3 in the Oregon Global Warming Commission's Forest Carbon Accounting Project Report from 2018).

[6] Harmon, M.E.; Hanson, C.T.; DellaSala, D.A. Combustion of Aboveground Wood from Live Trees in Megafires, CA, USA. Forests 2022, 13, 391. https://doi.org/10.3390/f13030391

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

Campbell, JL, A Agar. 2013. Forest wildfire, fuel reduction treatments, and landscape carbon stocks: A sensitivity analysis.

to re-burn at a higher intensity and mortality in the future.[8]

- **Our fire-impacted forests are worth more standing.** Clearcutting fire-impacted public lands may bring short-term gain for private logging companies, but this comes at the long-term expense of other public lands values borne most heavily by communities that depend on them. Rather than targeting fire-impacted forests for large scale commodity extraction, federal forest managers should protect sensitive fire-impacted forests and allow them to regenerate naturally so that our communities may benefit from the myriad ecosystem services they provide.

- **Post-fire logging must be carefully analyzed to not cause additional harm to sensitive landscapes.** Across the region, thousands of acres of federal forestland managed by the National Forest Service and Bureau of Land Management are currently being proposed for clearcut-style post-fire logging, including well-loved forests along the iconic McKenzie, North Umpqua and Breitenbush rivers. Some of the post-fire logging plans are advancing through the National Environmental Policy Act (NEPA) process as Environmental Assessments but others are utilizing new loopholes provided by the Trump administration's expansion of Categorical Exclusions (CE's). Other post-fire logging projects skirted the NEPA process altogether and resulted in the clearcutting of fire-impacted public forests with no formal proposal, scientific analysis or public process. The use of CEs and blatant disregard for NEPA are inappropriate in sensitive landscapes where logging can harm wildlife habitat, drinking water, recreation values, and natural vegetation.

## Our Recommendations

To avoid replicating the harm inflicted by the Forest Service in the aftermath of past fires, federal land managers facing future fire seasons must fundamentally change their approaches to advance a management ethic of care and caution rather than hasty extraction. 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.

Protect Post-Fire Forests. As much as possible, land managers should let forests recover naturally after fire. Management of post-fire forests should prioritize the protection of regrowing native vegetation and sensitive soils, and the retention of legacy trees, habitat snags and remaining living trees.This will prepare forests to be more resilient in the face of climate change and future fires.

Require Transparency & Accountability .Especially in sensitive post-fire landscapes, federal land managers must act with absolute public transparency and robust processes for environmental analysis. No post-fire logging should occur without adequate public notice, scientific analysis and a robust input process.

Focus Fire Funding Where it's Proven to Help. Funding for post-fire recovery should not be wasted on expensive, ecologically-destructive and widely-criticized post-fire logging practices, but instead should be

[8] Christopher J. Dunn, John D. Bailey 2015. Modeling the direct effects of salvage logging on long-term temporal fuel dynamics in dry-mixed conifer forests. Forest Ecology and Management 341 (2015) 93–109.

Jonathan R. Thompson, Thomas A. Spies, and Lisa M. Ganio. 2007. Reburn severity in managed and unmanaged vegetation in a large wildfire. Proceedings of the National Academy of Sciences. PNAS published online Jun 11, 2007.

Donato, J. B. Fontaine, J. L. Campbell, W. D. Robinson, J. B. Kauffman, B. E. Law. Post-Wildfire Logging Hinders Regeneration and Increases Fire Risk. www.sciencexpress.org. 5 January 2006

spent on the activities proven to protect homes and communities such as home hardening and creation of defensible space directly around structures.

## Summary

The Breitenbush watershed in the Willamette National Forest, highlighted in the **case study below**, is just one heartbreaking example among many of heavy-handed, hasty, and often lawless post-fire logging that continues to occur in fire-impacted watersheds across the Pacific Northwest. Irresponsible and secretive post-fire activities like those that occurred in the Breitenbush watershed have further harmed fire-impacted forests and communities. The actions of the Forest Service and Bureau of Land Management in the aftermath of past fire seasons have inspired widespread distrust and raised valid questions about whether current management practices are working in the best interests of our public lands and collective futures. In the age of future climate-fueled wildfires, we need to adopt 21st century fire management practices to ensure our forests remain healthy and our communities are safe from the flames.

We urge the Oversight Subcommittee to consider issues of post-fire logging as you move forward in addressing how the US Forest Service manages public forest resources. For example:

- Is subsidizing the US Forest Service to cut trees after a fire an effective way to reduce fire risk in the future? What other management options are better proven to do so, and how can funding be prioritized for those activities instead of harming natural fire recovery?
- Can federal land management bodies adopt a protocol for post-fire forests that prioritizes protection of fire-impacted landscapes and allows for natural recovery as much as possible? What are the benefits to carbon storage, water quality, and wildlife habitat in doing so?

Thank you for your time and consideration,

Pacific Northwest Forest Climate Alliance

Members of the **Wildfire Working Group** of the Pacific Northwest Forest Climate Alliance

Represented by:

Chandra LeGue
Western Oregon Field Coordinator
[redacted]

# A Case Study

## Illegal Post-Fire Logging in the Iconic Breitenbush Watershed

All of the post-fire logging in this case study occurred without adequate scientific analysis or public oversight, on federal public lands that remain, since 2020, locked and closed to the public.

The Breitenbush River watershed is a widely beloved part of the Willamette National Forest containing old-growth forests, the famous Breitenbush Hot Springs Retreat and Conference Center, private summer home cabins, and the salmon-bearing Breitenbush river and its tributaries, proposed as a Wild & Scenic River under Senator Ron Wyden's River Democracy Act of 2021.

After the historic 2020 wildfire season, when the Beachie Creek and Lionshead fires burned through the Breitenbush watershed, several problematic post-fire logging projects authorized by the Willamette National Forest moved forward without proper public review, effects analysis, or transparency.

Hasty Old Growth Clearcutting—In December 2020, the Willamette National Forest hastily authorized clearcutting of centuries-old forest directly adjacent to the Breitenbush Hot Springs Retreat Center and its surrounding dozens of privately-owned summer home cabins that had burned in the fires. The logging felled ancient trees, destroyed known spotted owl habitat, and left little buffer along fish-bearing streams that feed into the Breitenbush River. Despite the close proximity of stakeholders who had already suffered great losses from the fires, the Forest Service moved forward with this logging behind locked gates, without public notice or scientific analysis, and with no notice to the Breitenbush Retreat Center or local cabin owners. For many locals in the area, the Forest Service's secretive clearcutting of this ancient forest was a much greater harm than the destruction caused by the fires themselves.


*Photo—Btreitenbush summer homes cabin area by Michael Hudson*

The Forest Service **later apologized** to the cabin owners and Breitenbush Hot Springs business for its failure to provide notification before clearcutting. As a result of the loss of this forest, some cabin owners are choosing not to rebuild in the footprint of a post-fire clearcut.

Roadside Clearcut Corridors—Not long after the logging in the summer homes cabin area, the Forest Service worked with the Oregon Department of Transportation (ODOT) to conduct hazard tree removal along roadsides throughout the area. While these activities also occurred behind locked gates, locals in the area shared documentation of these activities. The public was shocked and outraged to learn that "hazard tree removal" meant 200-foot clearcut corridors. The clearcut corridors removed many legacy trees and standing green trees that posed no apparent hazard and would likely have survived to see the spring. In many cases, these clearcut corridors left little buffer to protect the Breitenbush River and its many tributaries from erosion and sedimentation.

*Photo—roadside logging of green trees in Breitenbush watershed by Michael Hudson*

These clearcut corridors were widely criticized by locals, spotlighted in the media, and investigated by state level officials for being opaque, heavy handed, and destructive[9].

Separately, the Willamette National Forest proposed logging of 400 miles of roadside corridors across the forest—many on roads long closed to public use—using a Categorical Exclusion. After challenging the Willamette National Forest in federal court, Oregon-based conservation organizations won a lawsuit to halt the remainder of the Willamette Forest Service's hazard tree removal plan[10]. In their decision, the

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9 https://www.opb.org/article/2021/04/29/lawmakers-investigate-reports-of-irresponsible-tree-cutting-after-wildfires/

10 https://www.opb.org/article/2022/01/13/roadside-logging-willamette-national-forest/

judge ruled that the Forest Service had failed to adequately analyze the long-term impacts of these large-scale logging plans in the sensitive fire burned forest.

*Photo—roadside clearcuts along Hwy 46 by Michael Hudson*

Illegal Contract Changes—At the same time hazard tree removal was being challenged in court, the Willamette National Forest came under fire for yet more shocking and secretive activity. In the aftermath of the 2020 fires, the agency quietly planned to convert previously-approved ecological thinning contracts to post-fire clearcuts with no public notice or environmental review. A public information request filed by citizens exposed this issue, which would have resulted in clearcutting part of the fire-burned forest. In the years preceding the fires, Breitenbush area locals and conservation groups had reached a hard-fought compromise with the Forest Service on the Highway 46 Project: dropping plans to clearcut, and allowing ecological thinning in older forests. However, after the fires, the Forest Service disregarded this compromise with no notice to stakeholders who worked for years to protect the area, instead quietly changing the contracts to approve post-fire clearcutting. The exposure of this contract change by the public led to widespread criticism of the Willamette National Forest's activities in the watershed.

In December of 2021, conservation groups won a lawsuit challenging the Forest Service's secretive contract changes when a federal judge ruled that the Forest Service's actions were ultimately unlawful as they skirted the NEPA process[11].

11 https://www.oregonlive.com/pacific-northwest-news/2021/12/judge-halts-logging-on-wildfire-scarred-forest-near-breitenbush-hot-springs-detroit-lake.html