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Dear Oregon Congressional Delegation,

As Oregon's communities pick up the pieces following this season's wildfires, the Trump administration is moving hastily to aggressively log federal public lands. The recent expansion in the size of logging projects that can be "categorically excluded" from the National Environmental Policy Act on lands managed by the Bureau of Land Management (BLM) has expedited large-scale post-fire logging projects, allowing federal agencies to advance clearcut logging in fire-impacted forests with little scientific input, public process, or transparency. These practices are damaging to the climate, given that Oregon's federal forests are some of the most carbon dense on the planet. They degrade water quality, impact wildlife habitat, and raise future fire risks—and will not protect communities. We note that the Oregon Global Warming Commission, in a 2019 report to the Governor, cited the forestry industry as one of the biggest polluters of carbon emissions in the state and called for nature-based climate solutions to meet Oregon's ambitious and necessary emissions reduction goals.

Already, more than 10,000 acres of fire burned forest are on the chopping block, including old forests in public lands along the iconic McKenzie and North Umpqua rivers. If Congress and the incoming Biden administration do not take a stance against these proposals, Oregon's communities will witness the conversion of biologically diverse and unique post-fire rejuvenating forests into fire-prone and biologically deficient logged-over landscapes.

As Oregon's federal delegation, please make an urgent and timely request to the incoming administration to halt post-fire clearcut proposals on federal public lands, and reverse the recent expansion of Categorical Exclusions that allow these destructive projects to be rushed ahead.

We request that you ask the Forest Service and BLM to:

- Prevent post-fire logging proposals from advancing as Categorical Exclusions, in order to encourage scientific analysis, public process and oversight under the National Environmental Policy Act
- Avoid post-fire logging in mature- and old-growth forests even if burned
- Retain all living trees regardless of age or size
- Ensure the retention of all large standing dead trees (snags), as recommended in the 2011 Revised Recovery Plan for the Northern Spotted Owl
- Retain structural complexity and postfire habitat creation by keeping downed wood in the forest
- Conserve both species and age diversity in forest stands; rejuvenating natural forests should not be converted into monoculture plantations
- Prefer natural regeneration of tree seedlings over nursery stock and protect soil integrity while preventing sediment runoff
- Ensure proper treatment of logging slash while maintaining soil integrity
- Prohibit logging in inventoried roadless areas and unroaded areas, Wilderness Study Areas, Areas of Critical Environmental Concern, Botanical Areas, national monuments, Wild and Scenic Areas, and all reserves designated by the Northwest Forest Plan
- Construct no new roads, temporary or otherwise, in fire-impacted landscapes

Rather than investing federal resources in post-fire logging practices that degrade public lands and increase global warming emissions, we request that federal forest management agencies focus limited public resources on practices that advance the ecological integrity of post-fire landscapes and directly protect human communities from urban fires.

The following proactive steps can be taken by federal management agencies in the aftermath of this season's fires:

- Restore recreation areas damaged by this season's wildfires by dedicating resources to update recreation areas, maintain trails and enhance the ability for Oregonians to enjoy federal public lands
- Protect water quality and intact watersheds by replanting native plants on severely burned slopes to combat landslides and erosion

- Decommission and restore unused roads that currently impact fire-affected watersheds
- Limit categorical exclusions to proposals that focus on removing only clearly defined hazard trees directly along roadsides, recreation areas and within 150 feet of high-use areas
- Invest in community wildfire defense from the home-outward, including funds for brush clearing and hazard tree removal in the home ignition zone immediately around homes and structures, with assistance to families still displaced from home losses, many of which are migrant workers and people of color

Home to some of the last remaining mature- and old-growth forests, Oregon's public lands play a unique role as havens of biodiversity, habitat, intact watersheds and carbon storage. Federal lands are remaining strongholds of biological diversity in a landscape otherwise heavily degraded by industrial logging. If left unchallenged, ongoing post-fire logging practices will severely alter public forests, undermining their unique role in biodiversity conservation and long-term carbon sequestration and storage.

Please call on the incoming Biden administration to protect Oregon's public BLM-managed forests from nearsighted post-fire logging proposals that prioritize timber revenue over the integrity of our public lands.

Relevant Background:

In just the past month, the Bureau of Land Management (BLM) has proposed destructive post-fire logging on thousands of acres of federal public lands, including in mature- and old-growth forests and watersheds that have experienced recent wildfires. Currently, more than 1,500 acres of BLM managed land in the McKenzie River watershed are proposed for post-fire logging, with at least one project advancing under the newly expanded categorical exclusions (CE). More than 6,000 additional acres of BLM-managed forest that burned in the Archie Creek fire are proposed for logging, including old forest that burned along the North Umpqua River. Given the Trump administration's rush to get out the cut, many biologically diverse and unique federal forests that are rejuvenating after fire will be candidates for destructive industrial logging in the coming months.

Federal policies, including the Northwest Forest Plan, the Spotted Owl Recovery Plan, and the Bureau of Land Management's own Resource Management Plan, establish the importance of federal lands in protecting and restoring mature and old forest and in constraining post-fire logging. Despite this, the BLM's narrow focus on meeting timber targets has resulted in massive post-fire logging proposals rather than supporting the rejuvenation properties of wildfires and associated ecosystem services. With the current glut of wood on the market, there is no justification for land managers to sacrifice Oregon's

unique and beloved federal lands in a post-fire logging frenzy. Instead, federal public lands should be protected for their contribution to old growth habitat and structurally complex post-fire forests.

Post-fire logging significantly delays ecological recovery and undermines the ability of federal public lands to play their role providing critical habitat, clean water and supporting long-term sequestration and carbon storage on the landscape. In fact, logging is the single most destructive action that can be taken after a fire. Logging eliminates the remaining biological legacies (e.g., large dead standing and down trees and live trees and natural seed banks) of the forest and replaces dynamic, fire-burned complex early seral forests with homogenous plantations (Lindenmayer, Franklin et al. 2004). While complex early seral forests are ecologically far superior to plantations in their ability to adapt to the changes of a shifting climate, plantations are more susceptible to disturbances such as wind, drought and wildfire,—especially uncharacteristically severe wildfire (Bradley et al. 2016). If ignited, these artificial forests tend to burn hotter and faster than complex early seral forests (Zald, HSJ et al. 2018). As drought continues to provide conditions for more extreme wildfire in places, it is imperative that we safeguard the ecosystems most equipped to adapt to these challenges.

Every forest in the Pacific Northwest has burned at some point, but due to a century of fire suppression, the presence of wildfire on the landscape has been significantly reduced. Wildfire boosts diversity in forests by helping to create biological legacies like standing dead snags, downed woody debris, and natural canopy gaps. This added complexity creates space for the introduction of complex habitat and rich diversity that is not present in forests that have been cut and replanted with commercial species. Even stand-replacing fire events retain the forest's structural integrity that numerous wildlife species depend upon. Sadly, these important complex fire-burned landscapes are becoming increasingly rare as both private and public lands are targeted for logging soon after a fire goes out.

Post-fire logging is destructive for forested watersheds and poses a threat to water quality and quantity. Removing most of the trees in a fire-burned watershed increases soil compaction, landslide risk and sedimentation in waterways (Karr et al. 2004). These practices are also known to exacerbate drought conditions and can reduce water levels by 50% during summer months when compared to adjacent unlogged watersheds (Segura et al. 2020; Perry & Jones 2017). This creates an added challenge for watersheds as the climate heats and dries in places. The major stressor of logging after a fire impacts water quality, damages habitat for aquatic species, and threatens communities who rely on clean and abundant drinking water. In all, protecting fire-burned watersheds places higher priority on the ecosystem that is left than the logs that can be removed (Reeves et al. 2006).

Finally, post-fire logging undermines the ability of fire-burned forests to sequester and store carbon on the landscape. Despite their impressive smoke plumes, wildfires typically only release about 10% of the carbon stored in a forest. The remaining dead wood decomposes slowly over decades and even centuries and soils retain carbon for millennia if not logged. In contrast, logging emits the vast majority of the carbon stored in a forest, and only a fraction ends up stored in wood products (Law, et al. 2018, Hudiburg et al. 2019). Climate-responsible forestry means leaving remaining trees on the landscape after a fire burns. Oregon's fire-impacted federal public lands can play a vital role in our global climate solution—but only if we don't allow them to be logged before or after fire.

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Sincerely,

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