



*Blue Mountains  
Biodiversity Project*

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House Committee on Climate, Energy, and Environment  
900 Court St. NE  
Salem, OR 97301

Re: Blue Mountains Biodiversity Project Testimony on HB 3846 - Oppose

Chair Lively, Vice Chairs Gamba and Levy, and Members of the Committee:

Thank you for the opportunity to provide testimony on HB 3846. Blue Mountains Biodiversity Project (“BMBP”) is an Oregon non-profit, public interest organization of about 1,000 members. We are based in Fossil, Oregon, and have additional offices in Eugene and Portland. Blue Mountains Biodiversity Project’s mission is to protect and restore the ecosystems of the Blue Mountains and Eastern Oregon Cascades. We have been active in Eastern Oregon since 1991.

Blue Mountains Biodiversity Project strongly opposes HB 3846. We are opposed to any attempt to transfer management or ownership of federal public lands to state or private entities. Federal public lands belong to all Americans. These precious landscapes and the ecosystems they support are not there for the taking by states, or by any other entities. The clean water, wildlife, fish, and carbon storage provided by National Forests are central to health and wellbeing of human communities and the environment. For example, National Forests and Grasslands provide clean drinking water to 90% of people in the west that are served by public water systems, and unequivocally “provide the cleanest and most stable water supply compared to other land types.” (Liu, USFS 2022). These lands are held in the public trust, for all of the public now and for future generations.

HB 3846 poses a direct threat to the ecosystems on the Ochoco National Forest, and to the human communities that depend on the forest for key needs such as clean drinking water. Further, the bill would undermine public participation in decision-making on federal lands, including for Tribes, as well as public transparency. Given the current threats from the climate and biodiversity crises, we need stronger protections for forests, streams, and the natural ecosystems that support communities and human health. This bill goes in the wrong direction, instead setting the stage for increased logging and heavy industrial resource extraction.

The Ochoco National Forest deserves better. The unique, biodiverse, and wild landscapes within the Ochoco National Forest deserve stronger protection rather than stifling public input, reducing transparency, and increasing logging and ecological degradation. The Oregon Department of Forestry (“ODF”) does not have the resources, capacity, or infrastructure in place to manage the Ochoco National Forest, which would more than double the size of land currently managed by ODF. Additionally, management of the Ochoco National Forest rightfully includes legal mandates to protect numerous species and conduct robust environmental review processes that include public participation. The laws and responsibilities on federal public lands are rightfully in place to protect our democracy, public health, and the environment. Proposals for the privatization of federal public lands should not be entertained by the Oregon legislature.

Furthermore, logging is a losing strategy for community protection:

***Logging in the backcountry will not make communities safer.*** Working near communities, home hardening, and emergency preparedness are far more effective strategies for keeping homes and communities safe ([Calkin et al. 2023](#); [Cohen 2000](#); [Gibbons et al. 2012](#); [Syphard et al. 2014](#)).

***The primary threat to homes is from grassfires, not forest fires.*** Most homes that burned in the US in recent years were destroyed by grass and shrub fire, not by forest fires ([Radeloff et al. 2023](#)). This highlights the realities of climate-driven wildfire and lack of efficacy in logging to control fire behavior. [Reporting from CNN](#) about the study notes: “Over the last three decades, the number of US homes destroyed by wildfire has more than doubled as fires burn bigger and badder, [a recent study found](#). Most of those homes were burned not by forest fires, but by fires racing through grass and shrubs.”... “The West is most at risk, the study found, where more than two-thirds of the homes burned over the last 30 years were located. Of those, nearly 80% were burned in grass and shrub fires.”

***Most homes are burned by large, fast moving fires.*** Fast-moving wildfires comprise less than 3% of all U.S. fire events– but they account for 89% of all structures damaged or destroyed. Fires move fastest in ecosystems that have low wind friction due to sparse or absent tree cover, which is associated with a dominance of grasses. Firefighters quickly become overwhelmed by fast-moving fires ([Balch et al. 2024](#)).

***Large, fast-moving wildfires are primarily driven by climate, not by “fuels”.*** Large, fast-moving fires are primarily driven by drought, heat, and wind– not by “fuels”. Climate change, regardless of forest “fuels”, is increasing the frequency and severity of wildfires, and the amount of area burned. ([Abatzoglou & Koldon 2013](#); [Abatzoglou & Williams 2016](#); [Abatzoglou et al 2021](#); [Balch et al. 2024](#); [Jain et al. 2022](#); [Keeley & Syphard 2019](#); [Keyser & Westerling 2017](#); [Kirchmeyer-Young et al. 2019](#); [Littell et al. 2009](#); [Miller et al. 2012](#)).

***The majority of fire ignitions that cross jurisdictional boundaries start on private lands, not public lands.*** The [Oregon State University Newsroom](#) discussed the [Downing et al. 2022](#) study: “The study area covered almost 141 million acres across 11 states and included 74 national forests”... “Of all ignitions that crossed jurisdictional boundaries, a little more than 60% originated on private property, and 28% ignited on national forests. Most of the fires started due to human activity.”

***Most fires are started by human activity.*** The [Balch et al. 2017](#) study found that “[h]uman-started wildfires accounted for 84% of all wildfires, tripled the length of the fire season, dominated an area seven times greater than that affected by lightning fires, and were responsible for nearly half of all area burned”. Furthermore, increasing road access– which is an essential part of logging– will further put large swaths of forests at risk for the most common fire ignitions– human-caused fire starts.

***Protecting forests from logging does not increase their fire risk.*** Protected forests do not burn more severely or with greater frequency compared to logged forests ([Bradley et al. 2016](#); [Odion & Hanson 2008](#)). In fact, logging may increase fire intensity and risk ([Cruz et al. 2014](#); [Evers et al. 2022](#); [Zald and Dunn 2018](#)). For example, logged forests become more susceptible to solar radiation, winds, and drying– thus becoming more flammable after logging in many situations ([Achat et al. 2015](#); [Countryman 1956](#); [Leismester et al. 2021](#); [Platt et al. 2006](#); [Summary of the Sierra Nevada Ecosystem Project Report 1996](#)). Heavy, industrial logging results in homogenous forests can increase fire risk and burn more severely ([Zald & Dunn. 2018](#)). In addition, there is a very short window of time that “treatments” are ostensibly effective, usually ~10-15 years ([Rhodes and Baker 2008](#)). The authors found that “treated” (logged) areas have a vanishingly small chance of encountering a wildfire during that 10-15 year window of time.

***Logging increases carbon emissions compared to unlogged forests, and compared to wildfire.*** Forests store vast amounts of carbon, and are a key part of the climate solution if they are left unlogged. Pacific Northwest forests alone hold live tree biomass equivalent or larger than tropical forests ([Law and Waring, 2015](#)). Conversely, logging is a major source of carbon emissions ([Hudiburg et al. 2018](#)). [Law et al. 2018](#)), greater by far than CO2 emissions from wildfires ([Bartowitz et al. 2022](#)), and represents the majority of emissions from US forests ([Harris et al. 2016](#); [Campbell et al. 2011](#)). Logging is the largest source of carbon emissions in Oregon ([Law and Harmon 2018](#)). Additionally, intensive biomass logging– which is becoming increasingly widespread in the US with industry plans for expansion– could constitute an important source of carbon transfer from forests to the atmosphere ([Achat et al. 2015](#)). Increasing emissions intensifies climate change, and further exacerbates wildfires and the negative effects of climate change to ecosystems.

We urge you to reject this bill, and to reject any consideration of transfer of federal public lands to other entities under any circumstances.

Sincerely,



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**Citations:**

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