



TO: Senate Committee On Natural Resources and Wildfire Recovery
FROM: Grace Brahler, Oregon Climate Action Plan & Policy Manager, Beyond Toxics
DATE: April 9, 2021
RE: Senate Bill 762-6

Chair Golden and Members of the Committee:

Thank you for the opportunity to offer these comments in support of SB 762-6 relating to wildfire. My name is Grace Brahler and I serve as the Oregon Climate Action Plan and Policy Manager for Beyond Toxics, a statewide environmental justice organization advancing policies that ensure meaningful participation and cultivating grassroots leadership from Oregon's frontline and impacted communities. My role involves co-leading the Natural and Working Lands Policy Tables concerning forests, agriculture, and water for the Oregon Climate Action Plan coalition (OCAP), which engages at every step of the EO 20-04 implementation process, working to ensure the strongest possible outcomes for our climate, our communities and our economy.

The most vulnerable populations carry the highest costs when a fire impacts a community. [Beyond Toxics spoke with community members](#) living near our southern office in Phoenix, Oregon, as they continued working to recover from the catastrophic Almeda Fire. Among the most significantly impacted by the fire were Latinx and senior community members. Many of these individuals were living in mobile home parks that were destroyed by the fire, releasing toxins into the environment and putting their health at risk.¹ Many of the emergency services and post-fire assistance was provided only in English. Seniors living on fixed incomes largely lack the resources necessary to prepare their homes for fire or build back following a fire. We must help vulnerable communities rebuild safely and be prepared for the next climate-driven fire.

It is with these communities in mind that we support the provisions that identify the locations of our most vulnerable communities (Section 7) and support community education and preparedness for wildfires, especially in limited-English speaking communities (Section 8). We also strongly support those provisions that implement a program to address the negative health impacts of wildfire smoke exposure (Section 13) and provide funding to make smoke filtration systems and other upgrades to reduce exposure available to vulnerable communities (Section 15). Our economy depends on migrant workers and farm workers, yet these individuals are on the frontlines of natural disaster-related hazards like smoke and excess heat that result in long-lasting health consequences. We support a grant program that provides resources and support directly to community-based organizations already working to support Latinx populations to disseminate information and increased preparedness in the most efficient and effective manner, as these organizations know what their communities need the most.

¹ Davidson, Kate, and April Elrich. "Their mobile home parks burned. Now rent is due." October 27, 2020. <https://www.opb.org/article/2020/10/27/almeda-fire-wildfire-oregon-environment-economy/>

Other provisions that will support community resiliency include the establishment of minimum defensible space requirements (Section 8), building code updates, and much-needed incorporation of wildfire risk reduction strategies into land use decisions (Section 11). There must be ample community engagement throughout these decision-making processes to center the needs and experiences of historically underserved populations.

While we are encouraged by this bill's efforts to invest in communities, I do want to express concern in regard to Section 18, which authorizes "fuels reduction" or wide-scale thinning as a wildfire mitigation strategy. I encourage the Committee to consider the best available science, which shows that thinning existing forests to reduce fire risk increases net carbon emissions to the atmosphere for many decades.² Carbon emissions from logging far exceed the carbon emissions from wildfire (50 percent emitted compared to 5-10 percent emitted respectively).³ Fire is a natural process and leaving partially burned trees on a landscape allows those trees to store carbon for decades, eventually decomposing naturally and transferring carbon into the soil. Little carbon is stored in wood products if partially burned trees are harvested for timber.⁴ With limited resources and time, we must focus our post-fire efforts on areas immediately adjacent to communities and conduct them in an ecologically-sound manner. Projects should be focused on readying the home ignition zone and immediate boundaries to communities for future wildfire events, both for the safety of our communities and our wildlands firefighters.

We also want to recommend necessary improvements to the establishment of the Wildfire Programs Advisory Council (Section 36).⁵ Appointments to the council, described in subsection two, make no effort to represent environmental justice or conservation interests and are thus insufficient. Council members will be charged with making "recommendations related to needed updates to the statewide land use planning program and local comprehensive plans and zoning codes to incorporate wildfire risk maps and minimize wildfire risk to people, public and private property, businesses, infrastructure and natural resources." The impacts of land use decisions unfold against a backdrop of enduring racial and socioeconomic inequities that have shaped how historically underserved and underrepresented communities can withstand those impacts. We cannot be blind to equity and justice issues when addressing land use, environmental and climate concerns, unless we wish to repeat and reinforce the decisions that have created sacrifice zones in low-income and Black, Indigenous, and Persons of Color (BIPOC) communities and left rural communities behind. We strongly urge the committee to make this council more representative of Oregon's racially and culturally diverse population and the strong needs to prepare for future wildfires in an equitable and ecologically-appropriate manner.

Thank you very much for considering these comments and for your hard work drafting this crucial bill.

Sincerely,
Grace Brahler

² Law, B.E., Waring, R. 2015. Carbon implications of current and future effects of drought, fire and management on Pacific Northwest forests, *Forest Ecology and Management*. <https://doi.org/10.1016/j.foreco.2014.11.023>

³ Id.

⁴ Harmon, M.E. 2019. Have product substitution carbon benefits been overestimated? A sensitivity analysis of key assumptions. *Environ. Res. Lett.* 14 065008. <https://iopscience.iop.org/article/10.1088/1748-9326/ab1e95>

⁵ These comments are an addition to my statements at the public hearing and highlighted to note the distinction.