

Forest Restoration & Resiliency Program

Forest Resiliency Working Group

Jeff Burns and ODF staff

I attended the virtual Information Session on the SB762 Grant Programs on October 25th. I have also watched the recording of the last two Working Group meetings.

I request that these comments be distributed to the Working Group and staff prior to the Thursday Working Group meeting.

Question: What is the contract amount that triggers the need for the Dept of Justice review?

Prescribed burning: In the discussion of the RFP it was suggested that prescribed burning would be a covered fuels reduction treatment. I support this. I don't know if you would want to say something with the RFP, but I know that the window for conducting prescribed burns can be narrow, and with windy or dry conditions, it might not be possible to burn some or all of treated acreage in the short timeframe of this program. Suggesting a back-up plan, if burning is precluded for the season, that applicants have additional fuels treatment planned to expend the funds, and seek other funds for future burning of pre-treated acreage.

I recommend that the "Tag and Extend" funding be limited to 50% of the available funds in the program. Should there be too few proposals submitted through the RFP process meeting the program criteria, the extra funding could be added to approved "Tag and Extend" projects.

There was a discussion at one of the Working Group sessions about assisting communities, especially low-income communities in high fire risk areas, to start the process of protecting the perimeter of their towns. I would also like to see funding for communities that have become "Firewise" communities, to assist in implementing recommended fuel management.

At the Public Information session, a participant Jennah Stillman asked about the eligibility of the town of Butte Falls in Jackson County, and it seems uncertain if it would be eligible for the grant program. This town has recently acquired a 430-acre Community Forest around the town of ~415 people, and has created a forest management plan for fuel reduction in three levels of priority. The town is apparently in a high fire risk zone (Talent and Phoenix are in Jackson County!) and was threatened by the 2020 South Obenchain Fire. They are now seeking funding for implementation of the fuel management plan. This project seems to me to be exactly the right sort of project, for protection of people and structures, and I urge the Working group to consider this and/or other rural communities in the WUI for direct, municipal level funding in this program. They are also in dialogue with adjacent forest landowners and regional groups to hopefully coordinate a larger landscape management effort, but wish to initiate treatment close to town as soon as possible.

Thanks for considering my comments. Thanks for your time and attention to this important work.

Darlene Chirman

Restoration Ecologist
7017 SE Martins St
Portland OR 97206
805-455-3541

The UDRC has two grant programs - one for low income seniors and one for lot/home owners. WWW.UDRC.org Defensible space tab.

Since 2005, the UDRC has invested close to \$900,000 in South Des. County, mailing in defensible spaces and fire adapted communities.

There are 11,000 lots in the La Pine Fire District that are rated high to extreme high risk of wildfires.

The Senate bill 762 should help non profits like the UDRC obtain funds so they can continue to help owners protect their property.

Jerry Hubbard, President, UDRC
Public Affairs Liaison, La Pine Rural Fire Protection District
PS - my task is to raise \$13 million to hire 18 firefighter/paramedics to reduce response times for EMS and Fire.

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Jerry Hubbard, CFM Retired, IFMA Fellow
541 390 9798

Forest Restoration & Resiliency Program

November 1, 2021 Forest Resiliency Working Group

Jeff Burns and ODF staff

I attended the virtual Information Session on the SB762 Grant Programs for Forest and Range Resiliency on October 25th. I have also watched the recording of the last three Working Group meetings, including the October 28th program on the RFP.

I understand that staff will be summarizing public comments that are submitted by November 1st for the Working Group. I request that my comments also be distributed in their entirety to the Working Group and staff prior to the next Working Group meeting.

I appreciate the effort the Working group and staff are putting in to devise the grant program and RFP, in accordance with Senate Bill 762, and fleshing out the program and RFP.

Diversity. I appreciate the efforts to include Oregon's diverse populations, both in terms of notification of potential applicants and designing the program such that vulnerable communities in the WUI have the opportunity to apply even if they are new to forest resiliency projects to protect their communities. I ask that you ensure tribal communities receive the RFP. I like the plan to hold an informational meeting for prospective applicants to answer questions about the proposals and eligible projects. There was a discussion about having a DOF staff contact in the announcement as well, for applicants with questions in preparing their proposals I encourage you to do include this.

Project Scope. Please prioritize for funding projects in the vicinity of communities at risk of wildfire, and along evacuation roads. Large firebreaks distant from communities, are not effective in protecting residents and structures. For example, non-commercial thinning of small trees and pruning up trees to reduce the risk of canopy fires,

provides forest resiliency and protects nearby communities. Use of prescribed fire is encouraged, and proposals for biochar in the woods as a form of slash management (reducing smoke and storing carbon in the soil) should be considered for funding.¹

Commercial logging should not be funded by the program. Projects with a commercial logging component should have a separate project description and budget.

Ecological/carbon considerations. The intent of the program is to reduce the risk of wildfire. The CO2 emissions resulting from wildfire is often stated as a reason for fuel management to reduce the risk. It is important to retain the mature trees, which provide the majority of carbon storage and significant carbon sequestration.² Even light thinning removes carbon storage that can take decades to recoup. Impacts to the habitat values of the forest increase as the intensity of the thinning increases. Older trees, in general, are more fire resistant, and their retention provides forest resiliency. For these reasons commercial thinning should be minimized and fuels management focused around communities and roads.

Community support. Proposals should provide evidence of community support for the proposed projects. This can be in the form of letters of support, or referencing local organizations supporting the project, and any in-kind or financial contributions to the project by local entities.

RFP. I was following the discussion about percentages that must be spent on implementation, and 70 % seemed the minimum. Planning, monitoring, equipment and overhead could comprise the remaining 30%. Since the subject of overhead came up at the end of the discussion, and if the ODF negotiated rate for federal projects is used, 14.75%, it doesn't leave much for the technical assistance, monitoring and equipment. A figure of \$15,000 as a maximum for equipment expenditure is used; that is 5% for a minimum project of \$300,000. So if a greater equipment allowance is made in larger projects, I suggest keeping the maximum at 5%.

Tag and Extend Projects. There was a discussion in the last Working Group about the amount to allocate to Tag and Extend projects, and it seems that most members agreed that \$10,000,000 or ½ of the budget was about right. Jeff mentioned that if Tag and Extend projects looked really good, it might go higher. I urge the Working Group members to go no higher than \$10,000,000 for these projects until the competitive grant proposals are received and reviewed. Should there not be enough competitive proposals that meet the project criteria, *then* additional funds could be added to Tag and Extend, possibly by determining if some of the funded Tag and Extend projects could expand their scope of work with additional funding within the timeline of the grant program of June 30, 2023.

Thank you for your consideration of these comments. Thanks for your time and attention to this important work.

Darlene Chirman

Restoration Ecologist

¹ Wilson, Biochar in the Woods. Carloni, Ken, PhD. Biochar: An Ancient Solution to a Modern Global Crisis, 2018. Umpqua Watersheds.

² Mildrexler, David et al. Large Trees Dominate Carbon Storage in Forests East of the Cascade Crest in the United States Pacific Northwest. 2020 Frontiers in Forests and Global Change

Darlene Chirman
7017 SE Martins St
Portland OR 97206
805-455-3541



OREGON CHAPTER SIERRA CLUB

1821 SE ANKENY ST • PORTLAND, OR 97214
PHONE (503) 238-0442 • FAX (503) 238-6281
OREGON.CHAPTER@SIERRACLUB.ORG
WWW.OREGON.SIERRACLUB.ORG

November 1, 2021

To: Jeff Burns, ODF Partnership & Planning Program. jeff.d.burns@oregon.gov
Alex Rahmlow, ODF Partnership & Planning Program
Members of ODF Forest Restoration and Resiliency Investment Workgroup

Subject: Oregon Chapter Sierra Club comments on screening and selection criteria for SB762 Forest Restoration and Resiliency Investment Grants

Thank you for working to make the restoration and resiliency grants under SB762 a success. We understand that ODF will not be providing opportunities for public review and comment on individual grant proposals. If that is indeed the case, it is even more vital that the screening and selection criteria for grant projects developed by ODF and its workgroup reflect the many values and expectations Oregonians have for their forests. The Oregon Chapter Sierra Club offers the following recommendations to ensure ODF's criteria include principles of ecological forestry and environmental protection:

Projects must focus on the type of fuels treatments that have been proven to help protect communities. Large fuel breaks that are designed to protect timber values should be deprioritized, as they are historically likely to fail in wind-driven fires and do not meet the stated goal of protecting communities and infrastructure. Examples of treatments with a proven track record include non-commercial thinning of small trees and/or pruning near roads and properties, careful use of prescribed fire guided by responsible smoke management, and focusing fuels treatment activities on areas close to homes and communities. Performing these actions in densely growing former plantations within ¼ mile of communities deserves consideration.

Only projects with no other funding source should be considered for grants. Keep the program focused on projects that aren't being funded through other means.

No commercial logging should be funded with this program. Grants awarded to projects that are truly dedicated to ecological restoration and resiliency could still allow for the possibility of some “marketable products/timber” derived as by-products of grant activities.

Project proposals must demonstrate strong support from the community: nearby landowners, impacted stakeholders, and interested members of the public, as well as collaborations with environmental, conservation and indigenous groups.

Proposals should include evidence and studies that support claims that proposed treatments are effective at reducing fire risk. Proposals should also include a monitoring and assessment plan for verification of the project's initial claims and longer term effectiveness.

Lastly, and perhaps most importantly, grant selection criteria should establish and reaffirm critical sideboards and limits for fuels reduction projects—sideboards and limits that protect ecologically important forests, large and old trees, forest structures that are important for wildlife, and riparian areas. It is not sufficient for ODF to simply say that projects will conform to applicable statutes or forest management plans. Each project selected under this program must be screened for and be held accountable for protecting these critical ecological and environmental values. Funded projects should explain for the record how such components will be protected, and ODF must provide sufficient oversight and verification. These environmental protection criteria must be front and center in the selection process, especially given that individual grant projects will (apparently) not be subject to any public review or comment.

Thank you for your consideration.

Sincerely,

A handwritten signature in cursive script that reads "Debra Higbee-Sudyka".

Debra Higbee-Sudyka
Chair, Conservation Committee
Oregon Chapter Sierra Club



October 29, 2021

Forest Restoration and Resiliency Investment Program,

I'd like to submit a comment in regards to the proposed ["Strategic Landscapes" map](#) that is being proposed by ODF for use in funding decisions related to SB 762 programs. While I fully acknowledge that SB 762 says projects will be prioritized by "...giving priority to projects within landscapes that are on lands in the four highest eNVC risk classes identified in the PNW QWRA." I find that using that data when averaged over a watershed misrepresents where the risk truly lies on the landscape.

There are a couple of factors at play here. The first is that in some watersheds, only areas with a high (negative) risk value actually are represented and other areas contain no data and are therefore null values. Therefore in these areas, when the risk data is averaged up to the watershed scale the negative values aren't averaged against lower risk areas because there is a null value. This results in watersheds that have a relatively low quantity of high risk pixels being grouped as one of the highest four risk classes. Several watersheds that run from east of Bend all the way north to the Columbia River fall into this category. This can be demonstrated in the graphics below, choosing the "Mud Springs Creek" watershed northeast of Madras as an example.

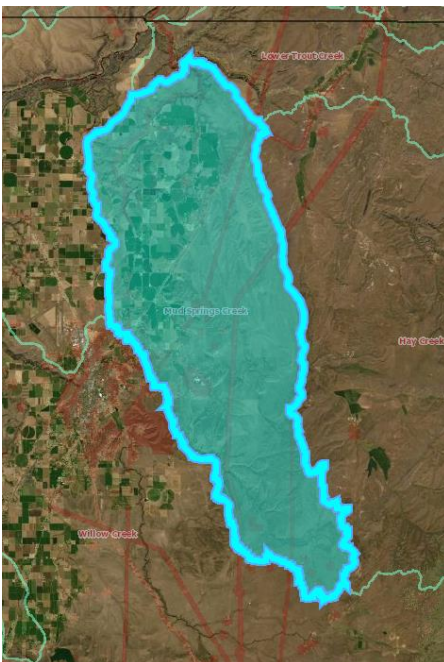


Figure 1 Mud Springs Creek Watershed (from OWRE)

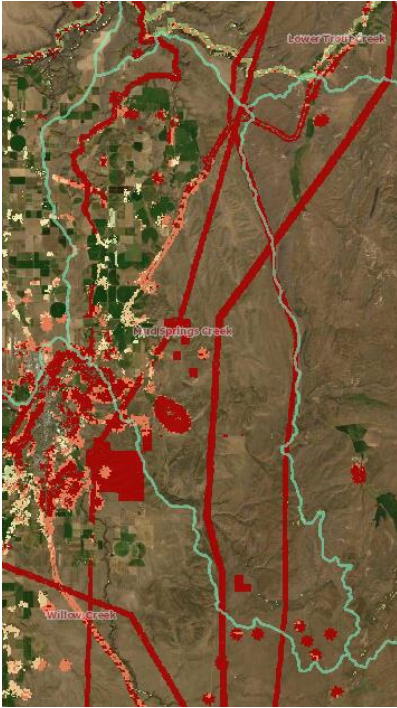


Figure 2 Mud Springs - Overall Wildfire Risk (from OWRE)

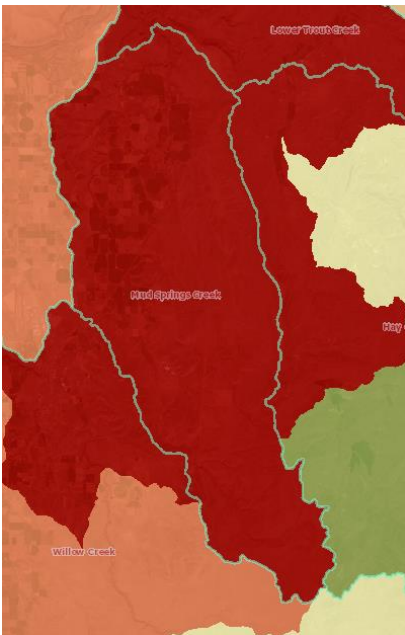


Figure 3 Mud Springs - Overall Wildfire Risk – Watershed (from OWRE)

As seen in figure 2 above, the Mud Springs watershed has very high risk depicted along a railroad track, US Highway 97, an underground gas line, a major BPA power transmission line (all metal poles) and the Deer Ridge Prison. You can also see that a good proportion of the watershed is dominated by irrigated cropland which is not assigned a risk value. Thus, when the pixels are added up across the watershed we see that Mud Springs at the watershed scale is noted to have very high risk, because the areas of no data are unaccounted for in the calculation.

The second factor that is causing several watersheds that should be falling into one of the four highest risk classes but aren't is the fact that many forested watersheds have pixels with positive risk values associated with them. This is because the QRA assumes that if a fire were to occur in these areas there would be a net positive benefit. This can be demonstrated in the graphics below, choosing the "Lower Little Deschutes River" watershed near La Pine as an example.



Figure 4 Lower Little Deschutes River Watershed (from OWRE)

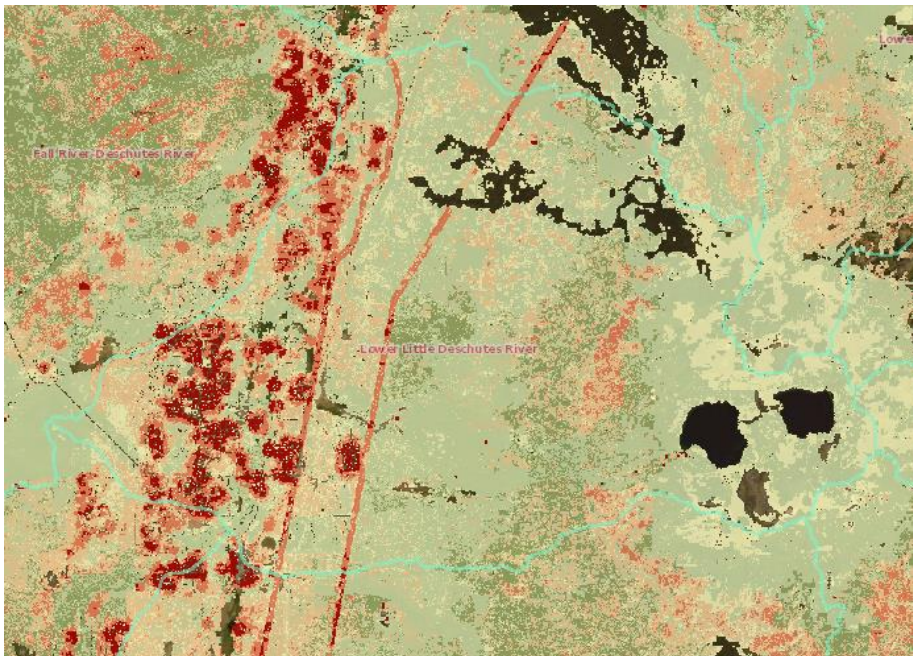


Figure 5 Lower Little Deschutes - Overall Wildfire Risk (from OWRE)

As seen in figure 5 above, the Lower Little Deschutes watershed has very high risk depicted along the same railroad track, US Highway 97, and underground gas line as in Mud Springs, however, instead of the rest of the landscape being irrigated agriculture as is the case in Mud Springs, the Lower Little Deschutes Watershed also overlays a portion of the

City of La Pine as well as several half to one acre rural residential subdivisions (literally thousands of residences) that are built within a lodgepole pine and bitterbrush fuel type. The Lower Little Deschutes River watershed does not rank as one of the top four watersheds by risk class because instead of the outlying areas having a null value for risk, those areas are instead assigned positive values in the QRA because of the anticipated net benefit should a fire occur. The end result is that the positive value assigned to the pixels depicted as benefit or low benefit end up skewing the overall risk calculation even though there are more very high risk pixels in this watershed than in Mud Springs.

While I'm one of the first people in line in terms of championing the need to restore fire to our fire adapted forests, and I'm not opposed to the idea that if fire were introduced to forests in this watershed (or several others, as this is just an example), in a planned manner, the reality is that in many of these areas, if a fire occurs on a hot August day in areas depicted as benefit or low benefit there is not going to be a beneficial result to either the forest or the community living next to it and we'll end up spending millions of dollars suppressing that fire due to the values at risk.

I would also qualify my comment to say that at this moment in time I don't have a project that I'm involved with that is planned to be submitted for consideration from either myself or partner groups I participate in. We may still come up with one before project submissions are due. The purpose of this comment is not to try and win points in a grant proposal, it is to ask for a correction because I can look at the map that ODF is proposing to use depicting the watersheds in the four highest risk categories and it just doesn't pass the "gut check" that it is going to accurately prioritize the states funding where the actual risk is. When watersheds where nearly no one lives are shown as high priority in far southeast Oregon or high in the Cascades, and yet areas west of Bend, in South Deschutes County, or numerous places where people throughout the east side counties don't make the cut you need to ask the question of why, and possibly consider a revision to the map.

I don't dispute the need to prioritize the dollars to where risk is highest, but would ask that ODF consider other ways to draw out where that risk is using the same PNW QRA risk data (30 M data). Not calculating in areas that are depicted as benefit or low benefit would be one consideration, or assigning a positive value to those watersheds that are largely devoid of data may be another.

Thank you for your consideration,



Ed Keith, Deschutes County Forester