SB 762 OR Department of Forestry Rules Advisory Committee (RAC)
Results for September 16 Post-Meeting RAC Input Opportunity

(v. 9/29/21)

Table of Contents:

Participant No.	1. At what interval should the Oregon Explorer be updated? Add your sub-question(s) here and label them A), B), C), etc.	(A) Please indicate your level of support for the ODF-revised recommendation: The Department recommends that OSU updates the Oregon Explorer and other web-based tools for SB762 within 12 months, but no sooner than 9 months, after updates to the most current wildfire risk assessment.	If you answered a 2 or 3 above, provide your suggestion for how you would change the recommendation to meet your interest.	(B) 2 - Prefer modification to clarify the language around a specific type of risk assessment and specific tools	If you answered a 2 or 3 above, provide your suggestion for how you would change the ODF-revised recommendation to meet your interest. (E.g. What specific type of risk assessment and tools would you add?)
		Total: 15 1=9 2=3 3=1 A=2		Total: 13 1=3 2=1 3=3 A=6	

1	Please provide more information in this question. It was not clear in the last meeting what actual update interval this represented (12 months after what - does this mean a new map every 12 months, 12 months after a 3 year update interval, 12 months after a 10 year update interval...?). It took several questions/comments/answers to get a shared understanding of what this even meant, which took up a lot of meeting time. In this case, just providing more text to say something like "The expected update frequency of the base wildfire hazard maps is between 3-5 years, meaning the Oregon Wildfire Risk Explorer would likely be updated every 4-6 years". And please explain the 9 month minimum so the group doesn't spin like it did with the 12 month question!! For what it's worth, I think there was so much discussion of this topic last time because people were confused why that was even a question that was posed to the group. It seemed like a no-brainer so people were reading too much into it thinking there must be a counter-argument to a 12 month update interval. Some clearer communication up front could have avoided this issue.	1. Full Support			

2		1. Full Support		1. Full Support	
3		1. Full Support		3. Do Not Support	I support the ODF recommendation as stated.
4		1. Full Support	We note that the above language does not provide information about overall frequency of updates. There will be interest in how often updates occur.	4. Abstain	We don't feel like there is sufficient context to answer this question.
5	There needs to be a structured timeline for mapping updates to adjust the expand/reduce urban areas and risk associated with wildland fire. this should not be measured in months, but rather years. There are several decision points taking place that require a timeline. 3 years seems like a reasonable cycle for updates that impact the regulatory process.	2. Prefer modification	if there is a way to make sure the regulatory trigger comes every 3 years I could support the change, but without this you face an ever-changing regulatory impact on code changes, planning updates, plan approvals etc....	2. Prefer Modification	if this gets at the question I posed above I could support. (B)2 seems to be getting at the regulatory concern I offered above. If that is the intent, than it would be helpful for successful implementation of the regulatory overlays that will be triggered by the fire risk assessments.
6	A. Will the WUI Layer be updated on the same interval as the Statewide Risk Map? B. Should these update intervals be the only opportunity for appeals?	3. Do not support	It is unclear what is meant by "most current wildfire risk assessment." If it is meant to say "Quantitative Wildfire Risk Assessment", then that is how it should be worded. I also do not like having the words "but no sooner than 9 months." If OSU can update tools	1. Full Support	

			sooner than 9 months, that would be great! Something we should discuss, however, is weather or not all tools should be released as updated at the same time or as they are updated.		
7	A defined term must be set. I believe 3 years should be the minimum and think 5 is better.	2. Prefer modification	I am not convinced that OSU will be able to follow that strict of a timeline.	4. Abstain	
8	A. What is a reasonable interval between an update to the Oregon Explorer and the effective date of updated mapping for regulatory purposes (OSFM, DCBS, DLCD)?B. What is a reasonable interval between map updates?	1. Full Support		3. Do Not Support	
9	Are you asking us to answer this question or just add our subquestions here? If so 1) I am largely comfortable wiht the update interval recommended by the agency, though I do not understand the need to say no sooner the 9 months - it feels like 9-12 months after the other information is available is a really narrow window.	4. Abstain	I need more information on why "no sooner than 9 months"	4. Abstain	I do not understand this question.
10	Annually	1. Full Support			
11		1. Full Support		1. Full Support	

12		1. Full Support		3. Do Not Support	I would have to hear the ideas for modification first.
13	I would defer to OSU and ODF regarding staff capacity to perform the work. I would rely on their recommendation for timing.	1. Full Support		4. Abstain	
14		4. Abstain	The recommendation seems fine to me, but I defer to Chris and Megan who have more experience with the Oregon Explorer platform and a better idea of how that can work best.	4. Abstain	
15	An agreed upon frequency based on QWRA data and consideration for impacts to stakeholders.	2. Prefer modification	More time may be needed for other stakeholders such as BCD to have their mapping information available within the same time frame.	4. Abstain	(B) above is unclear.

Participant No.	2. How should wildfire risk be calculated? Recommendation: The Department recommends that wildfire risk be calculated as a combined value of how often wildfires occur and intensity of such wildfires.	2. How should wildfire risk be calculated? Add your sub-question(s) here and label them A), B), C), etc.
1	I support this but request that the group be given a refresher on how wildfire hazard (vs risk) mapping works and walked through the tradeoffs of using only wildfire occurrence vs occurrence and intensity.	This is not a sub-question but rather a request for clarification and edits. This should be rephrased from "risk" to either "hazard" or "threat". Wildfire risk incorporates values at risk and effects of fire on those values, which is not considered here. Although the RAC received one presentation on risk mapping I think this point (risk vs threat) needs to be reinforced through some visuals and the group will need a fair amount of background to make an informed decision. I am not seeing any background materials in the materials distributed to the group but this would be well worth the time spent.
2	How are we defining the intensity of the wildfires? This should be a discussion either in RAC2 or within the OSU group and agreed upon.	(a) Should risk be updated when communities mitigate? (b) If so, should it be linked to local policies to require mitigation or reporting of adherence to local policies?
3	Support the Department recommendation.	
4	Department should use certified methodology consistent with Scott et al 2013 (RMRS GTR 315). This question also relates to other topics for RAC discussion - disturbances, fuels mitigation treatments, and climate change for example.	
5	agree	Frequency and intensity should be the dominant factors for determining wildfire risk. The more categories added the less focus there will be on the ignition risk faced in a forest environment, which is not so much a building and more related to the forest. the WUI map itself has already taken into account the urban environment by mapping it. From my perspective the WUI definition already includes more land that is truly not in an urban setting and includes land where density is minimal and does not match an urban environment. Keep the wildfire risk layer something that is truly related to wildfire risk.
6	I support this methodology.	
7	I support using both occurrence and intensity.	Both frequency and intensity should be used to define the risk.

8	Agree	
9	Generally agree...	Are you asking us to answer this question or just add our subquestions here? I need more information to answer the question. No subquestions.
10	Support Department recommendation	Based on standard best practices among scientific experts and fuel managers
11		
12	This is exactly how it should be done. Including other factors would only create unintended consequences and miss the mark of the purpose of this exercise.	
13	I agree with this recommendation	Risk should be calculated using nationally recognized standards and practices which recognize the likelihood of a fire occurring and the severity of the impacts of the fire. Risk should also recognize critical infrastructure needed for community recovery.
14	I agree with the recommendation.	
15	Support	Based on recommendations by ODF and OSU and founded on scientific data. Risk should be based on probability and intensity and should consider weather, topography and fuels. Ember travel (cast) should also be considered in the calculation of wildfire risk.

Participant No.	3. How should "vegetative fuels" be defined? Recommendation: The Department recommends defining "vegetative fuels" as "any land or clearing that, during any time of the year, contains enough plant growth or slash to constitute a fire hazard, regardless of how the land is zoned or taxed."	Add your sub-question(s) here and label them A), B), C), etc.
1		
2	Support	
3	Support Department recommendation.	
4	We are concerned that 'land' is the basis of this definition rather than the fuels that burn. More discussion needed.	
5	this definition would pull in anything that could burn, which I think dilutes the purpose of identifying wildfire risk and is why it needs to have a reference point to both WUI and wildfire risk mapping instead of a stand-a-lone definition.	Needs to be narrowly defined so you don't end up with a definition that sucks in everything that can burn and looses focus on where resources should be focused. In this question and questions 4-8 you are asking questions related to fire science, firefighting strategy, technical mapping capabilities that very few people around the RAC have expertise on. I believe ODF and OSU need to weigh in on a recommendation and explain the rationale for the selection. I don't believe the range of these questions can be answered by the majority of the RAC, including myself, because we collectively don't have the same scale of knowledge as OSU and ODF.
6	This should be defined in terms of the vegetation being suitable and able to carry a flame and act as fuel. Not all vegetation should be defined as a vegetative fuel and thus the definition should not include all vegetation. The recommendation as it sits, would include all vegetation. Perhaps, we first need to identify intent of this term and then define it to meet the intended use.	
7	I think this is too broad.	It should not include agricultural or horticultural crops. Landscaping should be called out separate from wildland vegetation.
8	Disagree - narrow considerably. A well manicured lawn, managed tree farm, or active farm operation would constitute "vegetative fuels" under this section - the WUI should not be so broad. Is there any property in Oregon that would not contain "vegetative fuels" under this definition? If so, please describe.	A. As part of the definition, should a threshold be established to distinguish between vegetative fuels that may be less susceptible to wildfire and those that are more susceptible?B. As part of the definition, should there be a distinction between vegetative fuels which are actively managed as part of a forest operation, farm operation, or as residential or commercial landscaping and maintained v. those that are not?

9	See comment to the vegetative fuels definition question - this is overly broad and is going to pull a lot of ag lands into the WUI - and make mapping very challenging because managed agricultural lands change frequently in many parts of the state.	Are you asking us to answer this question or just add our subquestions here? I do not like the proposed definition. My additional questions are around the treatment of agricultural lands, how those lands will be treated given the diversity in crops in Oregon, that some are perennial and some change multiple times a season, and that very little of the ag community has been engaged in this rulemaking or given the opportunity to provide feedback.
10	Support Department recommendation	Use common definition from states adopting the International WUI Code
11		
12	This feels initially very broad. I'm struggling with how to address lands that may have annual variability in their fire hazard. I'm reserving my strong feelings on this definition until I can hear more of the conversation.	
13	I am not sure that including "any land or clearing" is appropriate as a definition of fuels. I believe this proposed definition is similar to the definition of "forestland". Since we are only talking about vegetative fuels and not "land" would it make sense to modify to something like, " Vegetative fuels are those plants that during any time of year contain enough plant growth, slash or debris to constitute a fire hazard"	I would defer to recommendations from OSU and ODF on this but the definition should be consistent with national standards.
14		
15	See previous response for similar question.	For this purpose, fuels definitions are available in the International Wildland Urban Interface Code (IWUIC). We recommend defining fuels based on the IWUIC with consideration to the existing ODF terms defined in statutes and rules.

Participant No.	4. How should "wildland fuels" be defined?" Recommendation: The Department recommends defining "wildland fuels" as "grasslands, brushlands, woodlands, timberlands, or wilderness."	Add your sub-question(s) here and label them A), B), C), etc.
1		
2	Support	
3	Support Department recommendation.	
4	We feel that a more clear definition of "wildland" is needed here and recommend using the IWIUC definition which is "An area in which development is essentially nonexistent except for roads, railroads, powerlines, and similar facilities". The "fuels' portion of this definition should be pulled from the final language used to define "vegetative fuels".	
5	still think you need a landscape reference to WUI or wildland fire risk. Without it you will be mapping, parks, neighborhoods, green space, etc.. within the urban setting and dilute the focus of where treatments are needed based on WUI and wildland fire risk.	see response to Q3.
6	Perhaps we need to define wildland first. Wildland is an area that is managed or unmanaged as an ecosystem? This should be distinctly different than cropland and cultivated lands (which may instead fit into vegetative fuels). Natural or native fuels may also be considered wildland fuels. The NWCG defines wildland as - An area in which development is essentially non-existent, except for roads, railroads, powerlines, and similar transportation facilities. Structures, if any, are widely scattered.	A. Does fuel loading matter for mapping WUI?
7	I think this is too broad. That definition includes the entire state minus water.	Native and invasive plants which are prone to uncontrolled spreading of wildfire.
8	Disagree - narrow considerably. There is no limiting factor to this language. For example, if a 10-acre parcel contains a small patch of blackberries, does the parcel contain "wildland fuels"?	A. As part of the definition, should a threshold be established to distinguish between vegetative fuels that may be less susceptible to wildfire and those that are more susceptible?
9	I would like to discuss how pasture and rangeland is treated, and whether managed land will be treated the same as unmanaged land.	I have similar concerns as above with regard to the treatment of rangelands and particularly grazed rangelands.

10	Support Department recommendation	Use a common definition from states adopting the International WUI Code
11		
12	I guess this works... does it address the South eastern 1/3 of our state?	
13	I am ok with this	I would defer to recommendations from OSU and ODF on this but the definition should be consistent with national standards.
14	I prefer dropping wilderness from the definition. It doesn't add anything that I can see- if we think of wilderness in terms of federal designations, there isn't any fuel type that I come up with that presents a fire hazard and isn't already covered by the first four descriptors. Wilderness in and of itself is not a fuel type, although woodlands in a wilderness may be.	
15	See previous response for similar question.	For this purpose, fuels definitions are available in the International Wildland Urban Interface Code (IWUIC). We recommend defining fuels based on the IWUIC with consideration to the existing ODF terms defined in statutes and rules.