

# Key Issues Identified in Review of Wildfire Risk Map Feedback



## PURPOSE

This document summarizes the public input received following the release of the statutorily mandated statewide wildfire risk map in June 2022, along with key issues identified based on that input and actions planned to address those issues prior to release of the updated map in October 2023.

## BACKGROUND

Climate change has brought hotter, drier summers and historic levels of drought to Oregon over the past several years. These factors are a key driver of the rapid changes to Oregon's wildfire environment over the past decade—longer fire seasons and more challenging, costlier and destructive wildfires. At the same time, Oregon's population continues to grow and increasing numbers of people are living in or near the wildland-urban interface. This convergence of factors puts the state of Oregon—along with federal, local and tribal government partners and Oregonians generally—at a critical juncture. Bold actions are necessary to mitigate the catastrophic impacts of wildfire experienced by Oregonians, communities and our state's natural resources over the past several years. Senate Bill 762 laid the foundation for that bold action.

The bill passed in 2021 with bipartisan support and made investments in fire-adapted communities, wildfire response and resilient landscapes. Eleven state agencies are tasked with implementing the various components of SB 762. Several of those components are related to fire-adapted communities, including the creation and use of a "statewide wildfire risk map." Oregon Department of Forestry is responsible for overseeing development and maintenance of that map and establishing the risk classification categories to be assigned to properties based on criteria provided in law. Oregon State University is responsible for the actual development and maintenance of the map, making it publicly available and providing technical assistance.

The map's core function is as a planning tool. Having a central source for information on hazards and vulnerability promotes consistency and alignment in wildfire-related planning and decision making at all levels of government in Oregon. It also helps ensure the most vulnerable locations—those in fire-prone regions that are also in or around homes and communities (wildland-urban interface)—are prioritized for fire adaptation and mitigation investments, including:

- » Defensible space requirements for properties that are both in the wildland-urban interface and classified as high or extreme (Office of the State Fire Marshal).
- » Wildfire hazard mitigation building code standards (home hardening) for properties that are both in the wildland-urban interface and classified as high or extreme (Department of Consumer and Business Services).
- » Fuels mitigation grant programs for forestlands and communities (ODF and the Higher Education Coordinating Commission's Oregon Conservation Corps Program) and community risk reduction (OSFM).

Building the wildfire risk map from scratch has been a massive and complex technical and policy development effort; however, there is also a considerable information and outreach aspect to successful implementation of the map and SB 762 as a whole. The scope and scale of local-level communication and engagement necessary for Oregonians to genuinely understand the intent of SB 762 was far more than what initial deadlines allowed for.

Approximately five weeks after the map was unveiled—which was also the first major milestone in the implementation of SB 762—ODF withdrew the map for revisions. In that time, ODF fielded approximately 3,000 calls, conducted four information sessions that were attended by approximately 1,700 people, and received nearly 2,200 risk classification appeals from property owners. Further details of the inputs, main themes identified and potential actions to address issues are provided below.

The withdrawal of the map has given ODF and OSU an opportunity to make technical refinements based on the considerable input received, but it also provides state agencies with an opportunity that wasn't previously available: the time for in-depth and locally focused collaboration and information sharing.

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## SCOPE OF IMPACT

There are 1.8 million tax lots in Oregon, all of which were assigned a risk classification. Of those, 170,000 were classified as high or extreme (9.8% of total tax lots). Approximately half of those properties are in one of three counties: Jackson, Josephine or Deschutes. The notices required by law were sent to the mailing address for the tax lot owner provided in county records.

Of those receiving the notice, about 30% were outside the wildland-urban interface and, while defensible space and home hardening measures are encouraged because of the level of risk, those measures are not currently required under state law. The remaining 70% (~120,000 tax lots) were within the wildland-urban interface. It was further estimated that approximately 88,000 of these tax lots had a structure present and would potentially be subject to future regulation related to defensible space and home hardening, if that structure was a residence.

It is important to note that the figures provided above are the number of tax lots impacted, which isn't equivalent to the number of distinct property owners impacted, as one person may own multiple tax lots. Initial mailing refinement efforts resulted in identification of approximately 85,000 property owners for those 170,000 tax lots. The number of property owners may actually be smaller still, as mailing refinement efforts haven't yet addressed data inconsistencies, such as misspellings of individual or street names or differences in road designations (ex: "Drive" vs. "Dr."). Those further refinements will likely result in identification of additional duplicate individuals or addresses.

## INPUTS RECEIVED

Input was received from property owners, local governments and elected officials in a variety of ways. The majority of ODF's contacts with Oregonians were via **phone calls** and the **appeals process**. The department also received a number of emails and written letters with questions and comments. To date, OSU has also received a few hundred email inquiries, the majority of which were received between the map's release on June 30 and its withdrawal on August 5. Details on the focus of the phone calls and appeals received by ODF and the emails received by OSU are provided below.

Additionally, ODF & OSU representatives provided opportunities for questions and comments from the public during four information sessions held in late July and early August. These sessions were held in the parts of the state with a high concentration of properties classified as being in areas of high or extreme risk. The virtual session for Jackson and Josephine counties had approximately 1,300 attendees. The other sessions were in person and had more than 400 attendees total (75—La Grande, 90—The Dalles and 250—Redmond).

The virtual session for Jackson and Josephine counties was originally scheduled as two separate in-person sessions; however, ODF leadership made the decision to combine the meetings and shift to a virtual platform due to logistics in Jackson County and a public safety threat related to the Josephine County session.

### Phone Calls

ODF staff responded to approximately 3,000 calls related to the wildfire risk map, half of which were received by ODF's Southwest Oregon District (Jackson and Josephine counties). The reasons for the calls were varied, but the vast majority were seeking assistance or additional information. Of the more than 1,200 calls received at ODF's Salem Headquarters through the main help line set up for the map, just over 20% were requests for ODF to **send a copy of their homeowner's report**. This report is available to download from the Oregon Explorer, but ODF directed those who didn't have the ability to access the report on their own to call the department for assistance. Some of the request volume is likely related to occasions where access to the report was removed to help the Oregon Explorer platform cope with high user volumes. A similar number of people called for **assistance or additional information about filing an appeal**.

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The final key category of calls were those needing help understanding the notices received. Examples of common inquiries included:

- » What's the purpose of the notice I've received?
- » What do I need to do?
- » How will this impact my homeowner's insurance? What about my property value?
- » How was my property's risk calculated? What does it mean?
- » I'm no longer the owner of this tax lot, so why am I receiving this notice?
  - This problem is due to data issues with the tax lot owner mailing information on record with the county.
- » Why did I receive so many different notices?
  - This problem is because the notices are generated by tax lots, but one individual may own several tax lots.

## Emails

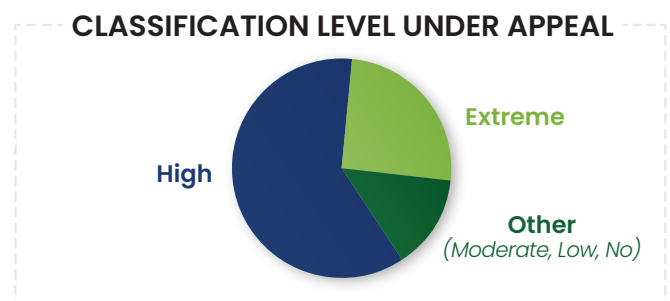
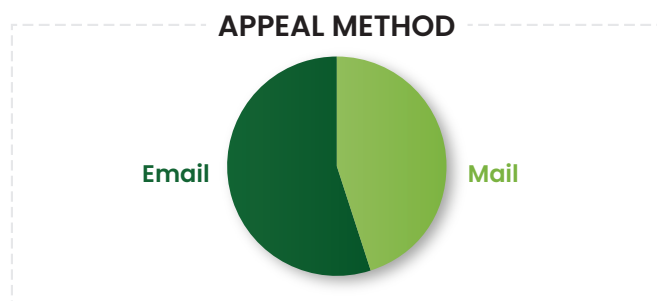
OSU has received a total of 343 email inquiries to date. Most emails included multiple questions. OSU tried to record and summarize all questions received. The most common inquiries were those requesting **more information about how risk was calculated** (20%), which included questions about modeling, mapping, criteria in legislation and more specific questions about datasets and classifications. Additional email subjects included:

- » Requests:
  - To download risk data
  - For Oregon Explorer technical support
  - For additional resources, such as speakers or information about public meetings
  - For site visits from ODF and/or OSU
- » Disagreement with risk classification
- » Risk not accounting for investments in defensible space and/or home hardening
- » Questions about:
  - Risk differing between neighbors
  - How irrigated land was accounted for
  - How to appeal
  - Defensible space and/or home hardening codes
  - Insurance impacts
  - Financial support for code compliance
- » Calls to repeal SB 762, many of which copied state agencies and legislators

## Appeals

The most robust and detailed source of input about the map has been the documentation and contextual information submitted through the formal classification and/or wildland-urban interface designation appeals process. The law requires ODF to provide a way for property owners to appeal the risk classification assigned to their property. When the initial map was withdrawn, the appeals period ended and any appeals submitted were rendered moot, as the classification and/or designation being appealed no longer existed. However, the department read through all appeals received and looked for recurring concerns in order to identify areas of focus for potential refinements to the map.

ODF received nearly 2,200 appeals, representing 1.3% of the 1.8 million tax lots in Oregon, all of which were designated with one of the five risk classifications. As would be expected, the majority of appeals came from the four counties with the highest number of tax lots classified as high or extreme: Jackson, Josephine, Deschutes and Klamath.



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The reasons for submitting appeals were far more specific and focused than the reasons for calling the department. Nearly half of all appeals fell into two categories: **the lot is irrigated** in some manner (28%) or the lot **already has defensible space and/or hardened buildings** (21% and consistent with one of the top categories from emails received by OSU). The other half fell into one or more of a wide variety of categories, including those who were appealing:

- » For a lower classification to protect their **ability to insure their properties** (concerns about being able to get or keep insurance if classified as high or extreme risk).
- » Because of the **uncertainty about defensible space and home hardening codes** and what would be required for compliance, as those were still under development at the time.
- » Due to concerns about future expansion of regulations connected to risk classifications.

## MOVING FORWARD

### **1. Communication, outreach and conversation are the focus of ODF's planning efforts for development and delivery of the next iteration of the map, including:**

- » Developing educational materials on wildfire hazards and fire behavior, in partnership with subject matter experts.
- » Completely overhauling the classification notification letter and homeowner's report with a focus on providing what homeowners want and need to know in a way that's easy to understand. There will also be an emphasis on ensuring both items are designed to help people easily connect to information about defensible space, home hardening, insurance and grants.
- » The same customer-focused, plain language approach will also be applied to ODF's public information materials related to the map.

Additionally, the department is looking into ways to address two key **mailing-related issues** that resulted in considerable confusion and frustration: incorrect recipients and receipt of multiple letters. As mentioned earlier in this report, the department is actively exploring ways to efficiently refine ownership and mailing data received from counties to limit the number of letters going to the same person.

Finally, there are ongoing discussions related to changing the name of the map to clearly articulate what the map depicts. Based on the requirements to base the classifications on weather, climate, fuels and topography, which better reflect hazard or exposure levels to wildfire rather than risk. Hazards are largely immutable characteristics of the area. Changing the name of the map decouples the idea that an individual can reduce their exposure through defense measures. While those measures can increase the likelihood a home will survive a wildfire, they don't change the factors that the fire will occur in the first place.

ODF recommends "**Wildfire Vulnerability Map,**" which not only reflects the vulnerability due to the hazards present, but also highlights the social and economic vulnerability layer of the map developed by OSU. Combining awareness and consideration of the **environmental, social and economic factors** that make particular areas more vulnerable to the devastating impacts of wildfires, thus driving limited resources to the areas of greatest need.

### **2. Local and statewide involvement in discussions**

**County level:** ODF—with its map partners—is planning to initiate **small workgroups** comprised of **elected and wildfire leaders** in the counties with the highest numbers of tax lots classified as high and extreme on the initial version of the map. Jackson, Josephine, Deschutes, Klamath and Harney counties account for nearly 70% of high or extreme classifications (115,574 tax lots). The primary objectives of the workgroups are to:

1. Build a local leadership group that understands the purpose of the map and the science that was used to develop it to effectively advocate for community needs related to the map and associated downstream regulation.
2. Ensure consistent, accurate information sharing.
3. Reassure communities that their leaders are involved in the process and have a forum to share concerns.
4. Engage in review of draft maps and provide input related to potential issues or anomalies.

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The workgroups will likely start meeting at least once monthly in February 2023 and continue through the end of the next appeal period, which is tentatively December 2023. The plan is to keep the groups small to promote relationship building and encourage dialogue and would ideally be comprised of local representatives from ODF and other implementation agencies, local city and/or county elected officials (no more than one county commissioner to avoid a quorum), local fire service representation and others as identified by local leadership.

ODF will be reaching out to those identified above in late December and early January to gauge interest and, if interested, determine who specifically will be participating. While efforts will be focused on the five counties listed above for these small workgroups, there are also plans for multiple **town halls throughout the state** to provide forums for information and questions in far more counties (tentatively scheduled for April through June). Additionally, representatives from the commissions of counties that neighbor the five listed above may attend the workgroup meetings if they're interested in more information.

**Statewide:** ODF is exploring the concept of a similar **workgroup at the statewide level** comprised of **legislators** from the districts with the highest number of tax lots classified as high and extreme and representatives from the **tribes** in those areas, along with representatives of ODF executive leadership and the Wildfire Programs Director.

ODF leadership will be reaching out to legislators and tribes in the districts described above to gauge interest in participation.

### **3. Clear communications related to wildfire hazards, vulnerability, risk & mitigation**

There is a clear need to increase Oregonians' awareness and understanding of key foundational concepts related to wildfire, including:

- » Local wildfire hazards and how those hazards influence fire behavior.
- » The differences between hazards and risk and what that means for them in relation to wildfire preparedness.
- » Community and property-level risk factors, best practices for mitigating those risks, and resources available to assist with mitigation efforts.

### **4. Technical refinements**

The department and Oregon State University are identifying verified, statewide data sets that accurately reflect irrigation and can be integrated into the risk modeling. Additionally, while concerns about fluctuations in risk classifications across adjacent parcels and "speckling"—one tax lot showing up as a different classification than all others around them—weren't among the top categories of concerns or issues expressed, ODF and OSU will be looking into both of those as well.

### **5. Policy changes**

The initial map rollout surfaced a few considerations where law and/or rule changes would improve the accuracy, understanding and acceptance of the map. ODF continues to work closely with the Wildfire Programs Director in the Governor's Office on identifying opportunities for improvements or enhancements to the laws governing the map specifically, and for advancing wildfire protection in Oregon generally.