

ODF RAC Input Summary for 10-14-21 Meeting

Question 3: How should “vegetative fuels” be defined? (New ODF Recommendation): The Department recommends defining “vegetative fuels” as “those plants that during any time of year contain enough plant growth, slash or debris to constitute a fire hazard. Wildland fuels are to be considered to be part of vegetative fuels.”

- 1) I fully support the proposal as stated = 5
- 2) I agree with the proposal as stated, but would prefer... = 5
- 3) I refuse to support the proposal as stated = 4

If you selected Two, what are your suggested changes that would allow you to select a One?

- A) DLCD has selected option 2. We appreciate the recommendation provided by ODF staff although we submit that using a term like “enough” could become complicated, itself requiring definition and criteria. We believe there would be value in discussing a more straightforward approach. The following language is based on listed types of fuels in the Fuel Model Key in the International Wildland-Urban Interface Code (IWUIC) Appendix D, used for fuel models that estimate fire danger in various plan communities across the US and are correlated with the IWUIC’s fuel loading definitions: “Vegetative fuels are herbaceous or woody plants consisting of mosses, lichens, low shrubs, grasses, reeds, forbs, brush, trees, or slash, singly or in combination.” This language clearly identifies what vegetative fuels are. Whether the amount of these fuels present in a particular area at a particular time constitutes a wildfire hazard would be determined in accordance with fuel load level and other criteria through the wildfire risk assessment.
- B) Make adjustments to address cultivated crops, ground cover, ornamental landscaping. without this change I don't know if it's possible to generate a map that does not include neighborhoods in urban settings that does not meet the test of how WUI should be applied.
- C) Irrigated plants, limbed up trees and other managed vegetation should be excluded.
- D) The revised definition seems reasonable, particularly as long as it is consistent with what adjacent states are using. - The addition of “Wildland fuels are considered to be part of vegetative fuels” feels unneeded, but it could potentially provide context and thus clarity in the future.
- E) Vegetative fuels are those plants that are non-cultivated, ornamental, or otherwise non-fire resistant that during any time of year contain enough growth, slash, or debris to constitute a fire hazard.
- F) Wildland fuels are to be considered to be part of vegetative fuels.”
- G) Instead of "to constitute a fire hazard" change to "that is combustible" this would make this definition consistent with other organizations.

If you selected Three, what are your specific changes that would allow you to select at least a Two?

- A) Vegetative fuels are those plants that during any time of year contain enough plant growth, slash, or debris to constitute a fire hazard, but do not include cultivated crops, ground cover, or ornamental landscaping.
- B) Only during fire season -not agricultural crops -not landscape plants -only in the WUI -not including wildland fuels
- C) We propose the following: “Vegetative fuels’ are those plants that during any time of year contain enough plant growth, slash or debris to constitute a fire hazard, but do not include cultivated crops, ground cover, or ornamental landscaping.” This definition would exclude managed farm crops and landscaped yards. Both Tim and Chris indicated that vegetative fuels do not include landscaped yards. This definition makes that clear. We also eliminated the language that includes "wildland fuels" as a subset of "vegetative fuels". If that definition were adopted, it would be inconsistent with the WUI definition, which treats "vegetative" and "wildland" fuels as separate, distinct fuel types.

Question 4: How should “wildland fuels” be defined?” (New ODF Recommendation): The Department recommends defining “wildland fuels” as “natural or native vegetation that occurs in an area in which development is essentially non-existent, and may include grasslands, brushlands, rangelands, woodlands, timberlands, or wilderness.”

- 1) I fully support the proposal as stated = 3
- 2) I agree with the proposal as stated, but would prefer ... = 7
- 3) I refuse to support the proposal as stated = 4

If you selected Two, what are your suggested changes that would allow you to select a One?

- A) I would like to discuss this element of the definition if possible. I may be able to get to a one on this after discussing the intent. "that occurs in an area in which development is essentially non-existent",
- B) DLCD has selected option 2. We appreciate the recommendation provided by ODF staff and continue to believe that discussing a more straightforward approach has merit. For instance: “Wildland fuels are vegetative fuels located in wildland areas.” As we all know, the WUI definition speaks to “... “wildland or vegetative fuels.” Our suggestion for “wildland fuels” is based on the definition of “vegetative fuels” suggested in our response to Question #3: “Vegetative fuels are herbaceous or woody plants consisting of mosses, lichens, low shrubs, grasses, reeds, forbs, brush, trees, or slash, singly or in combination.” “Wildfire” as defined in the IWUIC “means an uncontrolled fire spreading through vegetative fuels exposing and possibly consuming structures.” The suggested approach would link both definitions together simply and seamlessly and be consistent with the IWUIC. The language suggested above captures the concept of wildland areas without listing all of the circumstance that would be considered “wildland.” The result is a bit less text, which is usually a good thing. This language also identifies that “wildland fuel” is a function of location rather than fuel type. Put another way, it’s all vegetative fuel, which is consistent with the definition of “wildfire.”
- C) Natural and native vegetation is problematic. Merge the definition of Wildland from the IWC with the definition of vegetation we have established. Don't need an Oregon specific definition.
- D) Remove wilderness, not sure why you would include wilderness
- E) Same answer as above. There needs to be some exclusions.
- F) Natural or native vegetation that occurs in an area in which development is essentially non-existent, and may include grasslands, brushlands, rangelands, woodlands, timberlands, or any other uncultivated condition.

If you selected Three, what are your specific changes that would allow you to select at least a Two? (Please be specific and use bullet points when possible.)

- A) Strike wilderness and add "or any other undeveloped vegetative condition."

- B) It seems that wildland fuels should be defined as vegetative fuels in a wildland setting. The restriction to only "natural or native" makes no sense in a wildfire context. - Including "wilderness" in the list seems odd, as this is, I believe, purely a regulatory designation and not an ecosystem description. - How do Wash. and CA define "wildland fuels"? How does the IWUI code define it?
- C) Please revise this definition. My understanding of how this definition is used by others would simply identify any vegetative fuels growing in a wildland area. • Wildland fuels could include non-native species, which it seems this definition could be interpreted to exclude. • The listing of potential vegetation types seems like unneeded and potentially misleading designations. What about riparian zones, alpine meadows, and any other possible vegetation type that one might choose to define? Finally, wilderness is a land use designation and not a vegetation type. • The designation as-is is mixing classes in a way that feels quite confusing. The IWUIC defines wildland as, "an area in which development is essentially nonexistent, except for roads, railroads, power lines, and similar facilities" (<https://codes.iccsafe.org/content/IWUIC2018/chapter-2-definitions>). The National Wildfire Coordinating Group (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" (<https://www.nwcg.gov/glossary/a-z/sort/w?combine=>). • A recommended alternative definition for "wildland fuels" would be, "Vegetative fuels occurring in an area in which development is essentially nonexistent, except for roads, railroads, power lines, and similar facilities" to maintain consistency with how these terms have been defined by others.
- D) There should be an exclusion for cultivated crops, unless the Department adds language providing that cultivated cropland is part of an area where development exists, and thus excluded from the definition by that language in the proposed definition.

Question 5: Should the risk class thresholds be set as a value, or a percentage? (ODF Recommendation): The Department recommends that each risk class is a percentage of the overall risk.

- 1) I fully support the proposal as stated = 4
- 2) I agree with the proposal as stated, but would prefer ... = 3
- 3) I refuse to support the proposal as stated = 1

Other:

- A) I need these defined and the pros and cons of each explained to the group before making a policy decision.
- B) I do not have enough technical information to answer this; we need to have background information provided in order to answer these surveys. So, my answer is either "3" or "other." Again, how do Wash and CA assess wildfire risk classes? We need to be able to coordinate with our neighbors on many aspects of wildfire preparedness. The option of "percentage of overall risk" sounds rather arbitrary and not science-based. If risk is assessed looking at probability + intensity, then it seems we are looking at setting thresholds based on number of structures projected to be lost at various fire probabilities/intensities.
- C) Need more info about the difference.
- D) Without a more thorough discussion of the benefits and drawbacks of using a percent or a value, I don't feel that I have the resources to answer this question. I think the more important question is about how we define the classes themselves - for example, what is the difference between high and extreme wildfire vulnerability?
- E) Need more information
- F) We don't understand the question

If you selected Two, what are your suggested changes that would allow you to select a One?

- A) DLCD has selected option 2. We agree that the risk classes be identified as percentages but would like to include a discussion item: We suggest that an indicator of the margin of error or confidence level (or both) in the calculation be included if possible.
- B) Need to have a detailed conversation about percentages and how we calculate and value these. What are other states doing to calculate risk?

If you selected Three, what are your specific changes that would allow you to select at least a Two?

- A) See answer to "other."

- B) It is unclear what is meant by “percentage of overall risk.” Ultimately it would be best to use classes similar (or identical) to those used by adjacent states. What are those examples? I assume by “percentage” the recommendation is for percentiles to classify the data into bins. While these can be very intuitive to interpret by the trained observer. Fixed classes would make more sense, particularly over time when particular landscapes might move in and out of a fixed class but could be stuck in a percentile of for the overall state. In general, my feeling is that we should initiate a process to develop classifications based on expected risk, and base those on regional best practices.
- C) Need more information about the logic and application of the different approaches being offered.

Question 6: At what level should fuel loading be measured? (ODF Recommendation): The Department recommends that fuel loading be measured when “fire season” occurs.

- 1) I fully support the proposal as stated = 5
- 2) I agree with the proposal as stated, but would prefer ... = 2
- 3) I refuse to support the proposal as stated = 3

Other:

- A) I understand fire season to currently be July 1-September 30. This seems reasonable, but is this a moving target?
- B) This question is poorly stated given the proposed answer provided. Do you really mean "when should fuel loading be measured?" Yes - it should be measured during the fire season.
- C) Need more information
- D) We need more information

If you selected Two, what are your suggested changes that would allow you to select a One?

- A) DLCD has selected option 2. As we are now considered by many to be in fire season year-round, we suggest selecting a specific date in the spring, such as April 1 or May 1. This would help in planning for the previously accepted “fire season” and would be useful for some time into the future as climate change influences the timing and frequency of wildfires. It would also allow year-to-year comparisons, measurements, and statistical analyses.
- B) Rather than defining "fire season", maybe we say "during spring and summer seasons"

If you selected Three, what are your specific changes that would allow you to select at least a Two? (Please be specific and use bullet points when possible.)

- A) Why would we limit any of this to the "fire season"? Not only is that not static, but as I understand it, the models model fire year-round. Finally, SB 762 is not limited to the "fire season."
- B) How do we define fire season? How do we account for changes in length of fire season and annual anomalies? Fuel loading may be a better indicator. The models look at fire throughout the year, why add a temporal restriction here? We might just consider eliminating this indicator.
- C) The fire behavior models account for a probability of fires burning throughout the season and then cure the herbaceous fuels in accordance with that seasonality. As such seasonality is addressed in the fire behavior modeling and should not be further constrained.

Question 7: Should interim disturbances (large wildfires) be considered? (ODF Recommendation): The Department recommends that large disturbances that occur between wildfire risk assessments be captured in the subsequent wildfire risk assessment update.

- 1) I fully support the proposal as stated = 9
- 2) I agree with the proposal as stated, but would prefer ... = 2
- 3) I refuse to support the proposal as stated = 3

If you selected Two, what are your suggested changes that would allow you to select a One?

- A) DLCD has selected option 2. We agree that interim disturbances should be considered and that the subsequent wildfire risk assessment update seems like the appropriate time to account for them. We are interested, however, in whether “disturbance” should be limited to wildfire occurrences? Should changes to the landscape that could influence fire behavior, natural or otherwise, (prescribed burns, quarry or mining development, conversion to cultivated agriculture, pre-commercial or commercial thinning activities, weed treatment or juniper abatement, new roads or trails, utility scale photovoltaic solar development... etc.) be considered? Also, what constitutes a “large” disturbance? LCDC’s Sage Grouse Rule provides a definition of “Large-scale development.” We are including this cite in our response merely to serve as an example and not a recommendation. Clearly the context is entirely different. Please see the excerpt from OAR 660-023-0115(3) below: “(i) “Large-scale development” means uses that are: over 50 feet in height; have a direct impact in excess of five acres; generate more than 50 vehicle trips per day; or create noise levels of at least 70 dB at zero meters for sustained periods of time. Uses that constitute large-scale development also require review by county decision makers and are listed in one of the following categories identified in the table attached to OAR 660- 033-0120. (A) Commercial Uses. (B) Mineral, Aggregate, Oil and Gas Uses. (C) Transportation Uses. (D) Utility/Solid Waste Disposal Facilities. (E) Parks/Public/Quasi-Public. Finally, what is the expectation for ways the map may change due to the introduction of new disturbances? For example, would the occurrence of a large wildfire be presumed to reduce the wildfire risk in that area moving forward? We would hope that wildfire safety measures for development would remain intact under such circumstances.
- B) Need predictability. Can’t be constantly changing regulations

If you selected Three, what are your specific changes that would allow you to select at least a Two?

- A) I believe these should just be included as part of the regularly scheduled updates, which will allow for predictability for landowners on when updates to the maps take place.
- B) Need more discussion about this, if something changes the risk category of a property the owner should have the ability to get it changed ASAP
- C) We believe a more nuanced approach is warranted that distinguishes between large wildfires based upon frequency.