



The League of Women Voters of Oregon is a 101-year-old grassroots nonpartisan political organization that encourages informed and active participation in government. We envision informed Oregonians participating in a fully accessible, responsive, and transparent government to achieve the common good. LWVOR Legislative Action is based on advocacy positions formed through studies and member consensus. The League never supports or opposes any candidate or political party.

September 22, 2021

To: Oregon Board of Forestry
Jim Kelly, Chair
sb762.rulemaking@oregon.gov

Re: Wildland Urban Interface (WUI) proposed definition– **Support**

The League of Women Voters of Oregon supported SB 762, the omnibus wildfire bill. We have adopted a number of positions related to forestry and also have positions related to the general public health and safety of Oregonians. You, as the Board of Forestry, have recommended that Oregonians consider that the state should adopt the WUI definition that is most commonly used throughout the United States, especially in the West, and by the federal government - the “International Wildfire Urban Interface Code” definition: **“that geographical area where structures and other human development meets or intermingles with wildland or vegetative fuels”**. We agree.

As a reminder: on the final day of the 2021 session, the legislature passed Oregon’s first comprehensive, forward-looking wildfire preparedness and resiliency bill, Senate Bill 762. This bill is a critical step for Oregon to increase community preparedness, reduce future wildfire risk, and build resiliency to withstand the increasing severity and frequency of wildfires in Oregon. **Now it is time to implement SB 762 – the bill requires several state agencies to take actions and make investments towards achieving that wildfire resiliency.**

- Oregon should adopt the International WUI Code Definition: *“that geographical area where structures and other human development meets or intermingles with wildland or vegetative fuels”*.
- Adopting a scientifically sound, comprehensive, and nationally recognized WUI definition based on best practices is essential to protect life, property, and fire fighter safety in the wake of increasingly extreme and dangerous wildfire conditions.
- The International WUI Code definition is nationally recognized and used in professional applications at the local, state, and federal level. Nearly every western state, and many states across the nation, have already adopted all or part of the International WUI Code.
- The International WUI definition is recognized by the Council of Western State Foresters, federal agencies, fire managers, and other government and professional bodies.
- The 2020 wildfire season in Oregon burned over 1 million acres and destroyed more than 4000 homes. **One-sixth of Oregonians were under evacuation orders!** Oregon must improve our wildfire response systems, and the status quo of unfunded and inconsistent WUI approaches is no longer acceptable.
- In 2021, over 850,000 acres and over 160 residences have already burned in Oregon, and the fire season is not yet over, although the League celebrates this last weekend of rain. Unfortunately, there doesn’t seem to be much rain in the coming weeks. Two days of rain does not stop the fire season.

- Oregon needs a consistent and clear definition that is recognized by scientists, fire managers, and government bodies, not a one-off definition that risks unintended consequences and could allow interests to game the process.
- Having a nationally recognized WUI definition is important to ensure Oregon is eligible to secure federal funds for programs related to the WUI.
- Customized issues will be addressed in the extensive WUI criteria development process that will follow the adoption of the WUI definition, to account for unique local circumstances and features. **Adopting this definition is simply the foundational starting point, which will be detailed and refined in additional public processes over the next 5 months.**

This rule is the first step in implementing SB 762. Another rulemaking committee is developing the set of specific maps identifying which properties are most at risk. The League continues to work with the Dept. of Forestry to assure adequate opportunities for public participation for all voices. As part of that responsibility, we have provided our members with information about this rulemaking and others around SB 762. We expect to see opportunities to comment on the criteria and refined definitions acknowledging the diversity of Oregon related to those maps in the coming months. We support a fair and open appeals process, although we also expect an expeditious one as we recognize the urgency to move toward action on the ground as soon as reasonably possible. For now, **we support this foundational definition as work continues to refine the work specifically for a diverse Oregon.**

Thank you for the opportunity to discuss this proposed rule **and we urge your support for this definition of the Wildland Urban Interface as the foundation for setting criteria and refinement of the use of this definition in creating the risk maps, defensible space requirements and other actions required under SB 762.**


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