



Oregon Small Woodlands Association

187 High Street NE, Suite 208, Salem, OR 97301

Chair Golden, Vice Chair Heard and Members of the Committee,

My name is Amy Jahnke and I am the Executive Director of Oregon Small Woodlands Association, or OSWA. I represent the diverse needs of more than 3500 family forest owners across the state of Oregon owning 2 to 5000 acres of forestland.

Thank you for the opportunity to share our concerns regarding SB 248. Many of the issues addressed in this bill are very important to family forest owners and they support the need to address wildfire risk in the state. We feel that the -1 Amendment is going in the right direction; however, we have some concerns with the amendment as it is currently written.

Mapping of Wildfire Risk detailed in Section 7 would be a helpful tool for property owners to determine the wildfire risk hazard class of their property and create defensible space around buildings that is appropriate to the potential risk of wildfire. Since vegetative cover can vary on a property from one year to the next and quickly cause the wildfire risk hazard classes to become out of date, we advocate for including a not-to-exceed date of 3 years for the frequency of updating the maps to allow them to remain a useful risk mitigation tool for landowners. In addition, the current 477 statute allows the Local Land Classification Committee to create the classifications and allow for public comment in the process (which is removed in Sections 33 and 34 of the -1 Amendment), rather than having the Board of Forestry create the classifications as this amendment proposes. It's also not clear in the -1 amendment language what public comment will be included in this process, and we feel public comment is imperative to include.

Creating defensible space around buildings on forested property is important for our members and many landowners. I spoke with several OSWA members in different regions of the state whose homes were spared this fire season because they voluntarily complied with creating defensible space equal to or exceeding the wildfire risk hazard classes they were advised that their property was within. One of them spent \$9000 to create 200 feet of defensible space on three sides of his home and 60 feet on the remaining side to the property boundary, when the wildfire risk hazard was moderate in his area (which under the 2021 International Wild-Urban Interface Code standards recommends only 30 feet of defensible space). Landowners in the wildland urban interface are generally concerned about wildfire, and many voluntarily comply or exceed defensible space standards in order to protect their homes and property. In addition, many people have noted that there was no way that defensible space could have prevented some of the loss of homes this past fire season. There are concerns that mandating something that could not have been prevented is not the solution. And in cases where it might be the solution, more education and awareness of such programs as Oregon Department of Forestry's Certified Defensible Space program could be incredibly impactful.

To reduce wildfire risk, fuel reduction via prescribed burning could be a viable option for some forest landowners. The Certified Burn Manager Program outlined in Section 21 could help educate forest landowners about the current laws and process for completing a prescribed or controlled burn safely. We are concerned about the potential for this program to become a mandate in order to do pile burning or controlled burning on private property. In addition, there is no substitute for experience when it comes to prescribed burning, and there is a concern that someone who becomes a Certified Burn



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Manager may not have the years of experience that would truly warrant the protection from liability that the bill as written would afford.

Thank you again for the opportunity to share these concerns about SB 248 with you.

Sincerely,

Amy D. Jahnke, PhD

Executive Director, Oregon Small Woodlands Association