



**OREGON**  
**FARM**  
**BUREAU**

Locally Grown  
and  
GROWING STRONG

**House Committee on Veterans and Emergency Management**

OFB Testimony on HB 3308

March 18, 2021

Chair Evans, members of the Committee,

Thank you for the opportunity to provide comments on HB 3308. By way of background, the Oregon Farm Bureau (OFB) is the state's largest agricultural trade association, representing nearly 7,000 farm and ranch families across the state, many of whom are active contributors to rural fire protection districts and rangeland fire protection associations. Whether it is through their careers, volunteer efforts, or responsibilities as rural landowners, Oregon's farmers and ranchers frequently interact with fire on the landscape and recognize the need for thoughtful and effective solutions to wildfire mitigation, suppression, and preparedness. As such, OFB greatly appreciates the efforts undertaken by the Governor's Council on Wildfire Response and the legislature's continued commitment to addressing wildfire mitigation and recovery in a meaningful way.

While we agree in principle with many of the proposed avenues in HB 3308, there are concepts within HB 3308 that need further discussion. Oregon's farmers and ranchers know firsthand the devastating impacts wildfire can have on rural communities and the importance of proper land management to prevent fire from spreading on public and private lands. However we do have concerns on some of the practical implications of the mapping and defensible space portions of the bill as drafted, and would like to work with proponents to address these concerns and help move this conversation forward.

**Regionalization & Risk-Mapping:** Addressing wildfire is a unique and highly complicated issue; a one-size-fits-all approach will not adequately protect our communities and will not be workable for our local governments to implement. Any solution needs to be regionally tailored to meet the varied geographic needs of Oregon's diverse counties, existing protections must be taken into consideration, and there must be public involvement in any policy or regulatory decisions made using the map. We hope that any risk map that is created will consider the unique "on the ground" reality of life in rural Oregon, and will be sufficiently detailed to ensure that the map is a helpful tool in this conversation.

**Defensible Space:** As a general principle, OFB recognizes the need for managing properties in a way that reduces the risk of fire to one's neighbors and communities. However, defensible space provisions are complicated, and if not done with immense care, can cause considerable unintended consequences. For example, HB 3308 states that the defensible space standards adopted by OSFM must be consistent with International Wildland-Urban Interface Code standards. However, the current IWUIC uses definitions that do not consider the varied types of vegetation that exists in rural Oregon, including commercial agricultural commodities. In fact, the Code defines "Fuel" in a number of ways all incorporating the term "vegetation" but subsequently provides no definition of "vegetation", thus possibly including irrigated or commercial agricultural and timber products that pose far less of a threat than unmanaged brush. OFB is strongly opposed to any defensible space requirements that will result in the conversion of productive agricultural commodities.

Moreover, HB 3308 states that "The State Fire Marshal may establish different minimum defensible space requirements for homes and infrastructure on different types of land. [...] minimum defensible space requirement [...] for a type of land shall apply statewide for all lands of that type that are in areas identified as susceptible to wildfire." It is unclear how OSFM will define "types of land" and whether that will intersect with our land use planning system. Oregon has thousands of acres of land zoned for Exclusive Farm Use. However, EFU land in the Willamette Valley looks substantially different than EFU zoned land in Eastern Oregon, and how one fights fire on these lands will vary substantially by the geographic region. OFB is concerned that having defensible space standards that apply statewide based upon "land type" will actually hinder Oregon's approach to successful wildfire mitigation and response, as will not adequately consider geographic and environmental differences.

Thank you for the opportunity to provide comment today. Please do not hesitate to reach out with any questions or concerns.

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