



**HOUSE OF REPRESENTATIVES  
900 COURT ST NE  
SALEM, OR 97301**

July 29, 2022

Doug Grafe  
Wildfire Programs Director  
Office of Governor Brown  
900 Court Street, Suite 254  
Salem, OR 97301

Mike Shaw  
Fire Chief  
Oregon Department of Forestry  
2600 State Street  
Salem, OR 97310

Dear Director Grafe and Chief Shaw,

We are writing today to express our dissatisfaction with the recently released wildfire risk map. The map does not accurately convey the risk of fire in the wildland urban interface (WUI). There is a saying that if one person in a group asks a question, there are others in the group who also had the same question, but didn't speak up. In the July 27th virtual meeting on the topic, more than 1,200 of our constituents tuned in to share their concerns and opposition to the map. If there were more than a thousand of our neighbors who vocally expressed concerns, we can be sure that thousands more have the same concerns.

Our concerns, and the concerns of our constituents, include:

- Croplands are included in the WUI map, but should not be
- The map includes generalities and does not include specifics on properties, especially in regards to structures on a property
- The map uses the assumption that structures are on every property, which is not necessarily true
- Inconsistencies with communication about the methodology used in map creation (We have been told both that the maps are created from satellite images and do not take into account actual facts on the ground and also that site visits are unnecessary because the maps are not supposed to vary based on individual properties)
- Illogical discrepancies of risk levels in known fire risk locations (For example, one individual has a home in Jacksonville which was labeled "extreme" risk while their cabin in the Winema-Fremont National Forest was merely "moderate" risk. A second example

arose where one half of a duplex was labeled “extreme” risk while the other half of the duplex was not. This is so logically flawed that it calls into question the veracity of the entire exercise of creating these maps.)

Not only are there flaws in how this map was created and labeled, but there are issues related to the implementation. Along with our constituents, we have concerns about the appeal process and insurance.

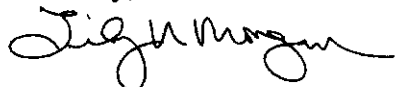
- How long is the appeal process going to take?
- Will these risk levels be implemented while the property owner is appealing?
- If an individual is classified as high risk, but believes it should be lower, will they be required to update their property’s defensible space and home hardening while the appeal process is occurring?
- If so, and an individual spends money to bring their home up to code and is then granted a lower risk classification, will they be reimbursed for the costs they incurred?
- How will the state ensure that insurance rates don’t drastically increase over the new map levels, especially during the appeal process?

We are already hearing from our constituents that they are concerned about the time and money it will take to appeal the risk level as well as the impacts of insurance rates that are already increasing. Anyone who believes that insurance will not be affected is simply in denial. At least one local resident has already been told by his insurance company that they are not renewing his coverage due to his property’s classification on the map. The recent communications with our constituents over the implementation of Senate Bill 762 is leaving us with more questions than answers.

We understand the importance of fire safety and prevention and we recognize the value of defensible space and hardening of homes. But the current map misses the mark. We urge the Oregon Department of Forestry to listen to the thousands of Oregonians who have concerns over the map and return to the drawing board to create a new wildfire risk map that accurately reflects the properties and structures on the land.

Additionally, we request the Oregon Department of Forestry extend the date for filing an appeal in the hopes that a new, more reasonable map can be produced in the meantime.

Sincerely,



Representative Lily Morgan



Representative Kim Wallan