



February 20, 2025

To: Oregon Governor Tina Kotek, Oregon House Representatives, Oregon State Senators, Oregon Department of Forestry, Oregon Office of the State Fire Marshall, Oregon Division of Financial Regulation,

Subject: Opposition to Current Wildfire Hazard Maps and Implementation of Senate Bill 762

Dear Governor Kotek, Honorable Legislators and Agency Directors,

The Eastern Oregon Counties Association writes today to formally oppose the implementation of the wildfire hazard maps and associated rules developed under Senate Bill 762. While we recognize the urgency of addressing Oregon's wildfire crisis, the current approach is fundamentally flawed, rushed, and counterproductive to the goals of protecting communities, promoting affordable housing, and fostering true collaboration among all Oregonians. Below, we outline our key concerns and propose a path forward that better aligns with the legislative intent and the needs of our communities.

1. The Rushed Process Fails to Reflect Legislative Intent

The development and rollout of the wildfire hazard maps and related regulations have been unnecessarily hurried, resulting in a program that does not reflect the thoughtful, deliberate policymaking envisioned by Senate Bill 762. By prioritizing speed over accuracy, fairness, and transparency, the state has produced a system that alienates rural landowners, undermines public trust, and risks exacerbating existing challenges rather than solving them. Instead, a measured, inclusive approach—one that prioritizes accuracy and collaboration—would have served Oregonians far better.

2. The Maps Ignore Property-Specific Conditions

The maps, as currently designed, are deeply flawed because they rely exclusively on broad landscape factors and fail to account for the conditions and surroundings of individual properties. This approach ignores the significant wildfire mitigation efforts already undertaken by many property owners, including the creation of defensible space and the use of fire-resistant materials. The lack of "ground truthing" provides no incentive for property owners to mitigate on their own and leads to arbitrary, unjust categorizations. The result is a system that feels punitive and disconnected from the realities on the ground.

3. The New Building Costs are Inequitable and Counter to Statewide Goals

The current maps and regulations pose a direct threat to affordable housing development, particularly in rural areas. The new building codes will increase costs on new construction for "high-risk" properties, disproportionately burdening low-income residents and impeding progress toward meeting the state's affordable housing goals.

4. The Appeal Process is Broken

The appeal process for challenging map designations is both inadequate and unjust. Property owners deserve the right to appeal their designation at any time—especially in light of changed conditions or evidence of individual mitigation efforts. Limiting appeals to a narrow window undermines due process and perpetuates the perception that the state is more interested in enforcing a top-down mandate than engaging in true collaboration with affected communities.

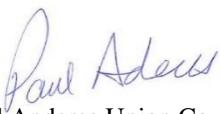
A Path Forward: Start Over and Get It Right

Given these significant flaws, we urge the state to scrap the current maps and implementing rules and return to the drawing board. Wildfires are too important—and too complex—to be addressed through rushed, one-size-fits-all solutions. In their place, Eastern Oregon Counties Association recommends the following actions:

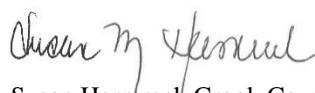
- **Conduct a Comprehensive Study** - Before implementing new maps, conduct a thorough, transparent study of wildfire risks that incorporates not only large-scale landscape factors but also property-specific conditions, including existing mitigation efforts. This study should involve input from scientists, local governments, and affected communities.
- **Incentivize Firewise Communities** - Redirect funding to support grassroots wildfire mitigation efforts in areas that demonstrate readiness and willingness to collaborate. Provide grants, tax incentives, or other resources to help property owners invest in defensible space, fire-resistant materials, and other firewise strategies.
- **Ensure Equity and Accessibility** - Any future program must prioritize equity, ensuring that low-income residents and rural communities are not disproportionately burdened. Affordable housing development should be supported, not hindered, by wildfire mitigation policies.
- **Foster Collaboration, Not Division** - Craft policies that bring Oregonians together rather than alienating them. This means listening to—and acting on—the concerns of rural landowners, local governments, and other stakeholders who will ultimately bear the brunt of wildfire risks.

Eastern Oregon Counties Association understands the urgency of addressing Oregon's wildfire crisis, but the program is too flawed to achieve its goals. We support Senator Golden's all-hands-on-deck challenge to create a program that pulls our citizens together to protect our State. Please let us know how we can assist with those efforts.

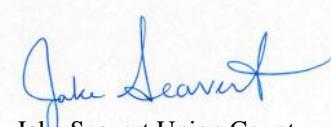
Sincerely,



Paul Anderes Union County



Susan Hermreck Crook County



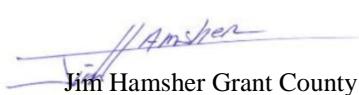
Jake Seavert Union County



John Shafer Umatilla County



Matt Scarfo Union County



Jim Hamsher Grant County



Joe Dabulskis Sherman County



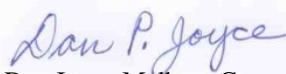
John Rowell Grant County



Christina Witham Baker County



Mark Wunsch Jefferson County



Dan Joyce Malheur County



Seth Crawford Crook County



Robert Frank
Robert Frank Harney County



Ron Jacobs
Ron Jacobs Malheur County



Patti Adair
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Seth Taylor
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Cris Patnode
Cris Patnode Gilliam County



Barry Shullenberger
Barry Shullenberger Lake County



Mark Albertson
Mark Albertson Lake County



Leah Watkins
Leah Watkins Gilliam County



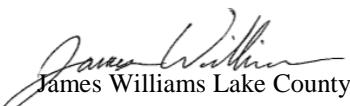
Brian Barney
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Lynn Morley
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Jim Mendiola
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James Williams
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Derrick DeGroot
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Shane Alderson
Shane Alderson Baker County

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