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Senate Natural Resources and Wildfire Recovery  
Oregon Legislature  
Salem, OR

**RE: SB 248-1**

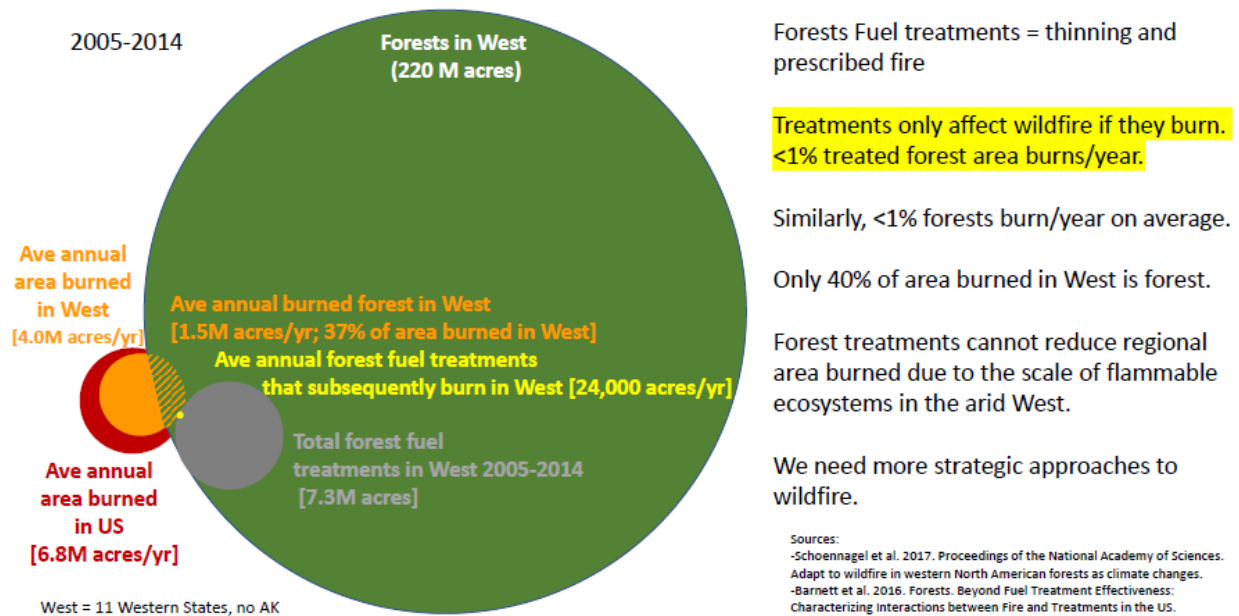
My name is Jay Lininger. I am a Wildland Fire Ecologist managing Pyrolysis LLC, a consultancy assisting land owners with resource inventory and management. Formerly, I worked as a forestry technician and wildland firefighter on crews employed by a non-profit contracting organization, very similar to the “**Wildfire Workforce Corps**” concept under discussion.

Crew work in the field offers invaluable experience for young people interested in land stewardship. It teaches a variety of technical skills central to professional practice of ecosystem management. Building a **Wildfire Workforce Corps** supports workforce development and scaling-up fire hazard mitigation work in Oregon communities. Oregon needs a dedicated and nimble workforce capable of undertaking any necessary job, including mowing flammable grass on high-hazard interface parcels, and manually thinning small trees in preparation for prescribed fire operations.

It is critically important that SB 248-1 narrowly defines fuel treatment areas eligible for state funding. Fuel treatments are effective only for a brief window of time and require periodic maintenance. Confining fuel treatments to an “interface area” surrounding at-risk communities maximizes the probability that treatments will make a difference to community protection when ignitions occur. In contrast, a broad definition of eligible areas lessens the probability of effectiveness as fuel treatments become more dispersed over space and time (Figure 1).

The importance of keeping fuel treatments close to communities is illustrated by recent events in southern Oregon, where grass fuel is a significantly greater hazard to interface communities than forest vegetation on a per-acre basis. The Almeda Fire of September 8, 2020, destroyed dozens of mobile homes in the Bear Creek Mobile Park on South Valley View Road

# Wildfires RARELY encounter forest fuel treatments in West



**Figure 1.** Spatial scale of potential fuel treatments is miniscule compared to scale of burnable wildland vegetation in the western United States. Treatments must be placed within and immediately adjacent to vulnerable communities to maximize the probability of effectiveness at mitigating fire hazard to public safety.

north of Ashland. A vacant lot adjacent to and directly upwind from that park was occupied by tall, dry grass that ignited readily and facilitated rapid fire spread beyond the containment ability of emergency services (Figures 2a, 2b). The **grass fire** produced flaming embers carried by gusting wind onto vulnerable structures in the mobile park (Figure 3). Notably, the park owners diligently maintained defensible space up to their property line, and it was largely unburned (Figures 4a, 4b). A pre-emptive fuel treatment of mowing flammable grass on the adjacent, upwind parcel could have spared the Bear Creek Mobile Park from disaster in the first hours of the Alameda event.

Finally, Section 8 of SB 248-1, paragraph 5, provides for prioritization of financial assistance to create defensible space “*on lands owned by members of socially and economically vulnerable communities...*” [emphasis added]. The word “owned” may, or may not, translate to priority assistance for vulnerable mobile home parks depending on who owns them. Park

residents may own their homes, but not necessarily the land underneath them. I respectfully ask that the bill include some provision enabling prioritization of assistance to benefit vulnerable communities where residents do not own the land. A provision for *adjacency* or *near-proximity* to vulnerable communities is warranted because, as Chief Horton of Jackson County Fire District 3 testified to this committee on March 15, any interface land that is not actively managed to mitigate fire hazard puts everyone in the neighborhood at-risk.

Sincerely,

A handwritten signature in black ink, appearing to read "Jay Lininger". The signature is stylized and cursive, with a prominent loop at the end.

Jay Lininger, M.Sc.  
Pyrolysis LLC

Att. – Figures 2a, 2b, 3, 4a, 4b



**Figure 2a.** Vacant lot adjacent to Bear Creek Mobile Park formerly occupied by tall, dry grass prior to Almeda Fire event on September 8, 2020. Note fuel consumption and ground scorch ending at irrigated property line of the park located at 1 Corral Lane, Jackson County, Oregon. © Jay Lininger





**Figure 2b.** Vacant lot adjacent to Bear Creek Mobile Park formerly occupied by tall, dry grass prior to Almeda Fire event on September 8, 2020. Note fuel consumption and ground scorch ending at irrigated property line of the park located at 1 Corral Lane, Jackson County, Oregon. © Jay Lininger





**Figure 3.** Bear Creek Mobile Park at 1 Corral Lane, Jackson County, Oregon, destroyed by Almeda Fire of September 8, 2020. Note grass fuel consumption and ground scorch ending at irrigated property line. © Jay Lininger





**Figure 4a.** Bear Creek Mobile Park at 1 Corral Lane, Jackson County, Oregon, destroyed by Almeda Fire of September 8, 2020. Vulnerable structures burned despite maintenance of irrigated defensible space. © Jay Lininger





**Figure 4b.** Bear Creek Mobile Park at 1 Corral Lane, Jackson County, Oregon, destroyed by Almeda Fire of September 8, 2020. Vulnerable structures burned despite maintenance of irrigated defensible space. © Jay Lininger