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Organization: Fish Lake Cabin Owners Association
Title: Secretary
Comments: 3/12/25

From Fish Lake Cabin Owners: Comments regarding the NWFP Amendments:

To Whom it May Concern:

We are a community of Forest Service Cabin owners in the Rogue River-Siskiyou National Forest including 30 cabin owners. Many current owners have ownership in cabins of family members which date back to the 1930s. We are passionate land stewards who value the integrity of our forests, the opportunities to recreate, accessibility, and feel personally accountable for assuring the safety of our forests.

There is no need for us to recreate any of the work that your qualified research individuals have compiled but we would like to concur that there certainly seems to be a need for a cohesive, collaborative approach to future fire mitigation which, we would like to be a part. As we were informed in the NWFP webinar, Forest Service Recreational Properties or Residences are [ldquo]Excluded[rdquo] in this plan. Our district Forester confirmed that this was the correct. Excluding cabin owners in this futuristic forest management plan seems it would create a gap in the expectations and responses to fires in proximity of these close of these [ldquo]Communities[rdquo].

[ldquo]Communities[rdquo] as described in the NWFP documentation:

community buffers [ndash] Areas around communities that are adjacent to or surrounded by National Forest System lands that currently have high fire risk and where treatments on National Forest System lands are designed to reduce fire behavior and intensity. Human health and safety are the primary values at risk within these areas. Community buffers are within the community wildfire protection zone. Community buffers are measured from the structures in the community. Maximum width of a buffer is based on potential fire behavior in adjacent areas under extreme fire weather conditions (97th percentile weather, probable average momentary wind gusts). The maximum width is sufficient to provide low radiant heat from areas of untreated fuels (four times the potential maximum flame length in adjacent areas on slopes less than 40 percent and six times the potential maximum flame length in adjacent areas on slopes greater than 40 percent).

community protection area [ndash] The community protection area encompasses locations where wildfire risks affect communities, tribal values, and infrastructure. There is significant risk of potential economic loss and public safety concerns posed by a wildfire occurring within this area.

It seems that, exclusion of recreational cabin owners goes against what this commission has offered as science based recommendations to include only a select population considered a [ldquo]community[rdquo]. We solidly view ourselves and our cabins as a [ldquo]Community[rdquo]. As the [ldquo]land[rdquo] we have assets is most certainly not [ldquo]ours[rdquo] we feel passionately that the safety of our forests [ldquo]is[rdquo] our responsibility. We stand solid that we want to be part of the bigger picture of saving the quality of our forests for future generations. If given the tools and direction to make our forests safer, we will do what we can to assist. We

need to learn of opportunities and have the cooperation of the Forest Service to give direction of what we are able to do to keep us and our families safe. We have vested financial investments in this community.

[ldquo]Safety[rdquo] continues to be a topic of cabin owner concern. Our cabins are on and are surrounded by thousands of acres of Forest Service property. Most of these forests have not been part of any fire mitigation in the last 50+ years. We recently were all sent ODF fire mapping certified letters which deemed our cabins on National Forest lands and in the EXTREME fire risk category. We certainly feel we should qualify for NWFP inclusion. All of our cabins are located on the end of dead end, one way roads which, in the case of a fire, would allow only one way out. The cabin access roads are accessible to the public but no parking or rule enforcements are in place. With no paid access to this area, it is up to the cabin owners to pay attention and if we see something, say something. This feels less than a [ldquo]safe[rdquo] environment when it comes to rule enforcement and the public often adds additional fire risk. Collaboration of [ldquo]community[rdquo] fire services should include us and[hellip].would be a welcomed addition to [ldquo]safety[rdquo] of all.

Have no doubt that this document and contents are familiar to your endeavors but would like to highlight a few aspects which seem that they are in line with our thoughts.

As stated in [ldquo]A Path for the Future[rdquo] an [ldquo]Urgent New Approach[rdquo]

The recommendations included in this approach included, establishing a community Wildfire Risk Reduction Program to pro actively address wildfire risk in a built environment. Expectations: This coordinated partnership would transform fragmented efforts related to fire risk (which, as cabin owners we historically can certainly can validate) in communities and create a more integrated, effective and science based approach for the inclusion of all. Collective, cross-boundary collaboration is therefore critical in this space. However, existing management structures and policies often make this challenging. Wildfire mitigation and management responsibilities are dispersed across numerous agencies, governments, and entities operating at different scales and with distinct missions, programs, budgets, and authorities. While some mechanisms for crosscutting coordination and alignment do exist in actions such as suppression and response, siloed approaches, poor interoperability, and insufficient collaboration have created gaps, barriers, and inefficiencies in many arenas. Existing systems and policies are inadequate to address the magnitude of wildfires of today and to undertake proactive actions at the scale needed to mitigate the wildfires of tomorrow (Tedim et al., 2020; Xanthopoulos et al., 2020). To shift the trajectory of the wildfire crisis, we cannot continue the status quo. There is a need for a paradigm shift toward systems and structures that are more comprehensive and better address the interrelationships between communities and landscapes.

Selected recommendations aligned with this theme include:

- * Establish a Community Wildfire Risk Reduction Program to proactively and comprehensively address wildfire risk reduction actions in the built environment. This coordinating partnership would transform fragmented efforts related to wildfire risk reduction in communities and create a more integrated, effective, and science-based approach. See Recommendation 1, on page 37 in Chapter 1: Creating the Foundation for Success.

- * Create the organizational and financial structures necessary to better integrate the national response to

wildfires and post-fire impacts across agencies and scales. Actions in the period of time immediately following wildfire event are critical to the ability of impacted communities to withstand the next disaster. Actions that build clarity around agency responsibilities post-fire and create a more coordinated, comprehensive approach overall, will improve the recovery process for both landscapes and communities. See Recommendation 60 on page 129 in Chapter 4: Recovering for Resilience.

* Change the system of land management agency performance metrics beyond acres treated or timber volume output to measure success. Reorienting performance measures to focus on outcomes grounded in ecological resilience, values at risk, and social outcomes such as collaboration, community empowerment, partnership, and equity would better incentivize work toward more meaningful measures of success and improve accountability. See Recommendation 147 on page 253 in Chapter 8: Frameworks for the Future.

* Develop a periodic review of the comprehensive wildfire mitigation and management system to assist adaptive management and adoption of needed changes. This review is essential due to changing climate conditions, increasing fire risk and severity, tremendous loss of life and property, and the urgent need for a more holistic, inclusive approach to wildfire mitigation and management. This review would help decision-makers track the implementation of proposed policy changes, improve and assess the efficacy of management approaches, and help guide policy decisions in the coming years. See Recommendation 148 on page 254 in Chapter 8: Frameworks for the Future.

* Increase accessibility of federal grants for community wildfire risk reduction and post-fire recovery efforts. Too often, these programs exist but are out of reach for both the most at-risk and the most in-need individuals and communities. Efforts to create both programmatic and procedural ease, as well as efforts to support communities to build the capacity necessary to successfully access federal funds, can increase the reach, equity, and effectiveness of federal investments. See Recommendation 142 on page 247 in Chapter 8: Frameworks for the Future.

* Increase and foster local participation in wildfire planning and management through collaborative pre-fire planning initiatives like the Potential Operational Delineations process. Fire management decisions can have consequential impacts for both short- and long-term risk in communities. Pre-fire planning efforts that incorporate local knowledge, seek local support, engage multi-sector partners (e.g., public health partners) and include collaborative decision-making are better positioned to create sustainable change in the built and natural environments. See Recommendations 57 and 58 on page 123 in Chapter 3: Responding to Fire. Shifting from Reactive to Proactive.

Thank you for your time and consideration, Fish Lake Cabin Owners Association Stewart Frantz, President FLCA
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