

From: [Greg Faust](#)
To: [Information](#)
Subject: FW: Change 2 year build Requirement
Date: Friday, August 8, 2025 9:03:22 AM
Attachments: [Remove 2 year building constraint .docx](#)

Hello Commissioners,

I am requesting the 2 year timeline to be removed from the replacement structure timeline. The current day realities are causing financial barriers to the residents of the Columbia River Gorge. There is evidence that demonstrates that recovery operations extend well beyond five years when accounting for:

- 17+ months for debris removal and site preparation
- Extended insurance settlement periods for complex claims
- Permitting and regulatory review periods
- Construction timeline with material procurement challenges
- Final inspection and occupancy processes

Washington State Wildfire Insurance Data

Recent data from Washington State's Office of the Insurance Commissioner provides crucial insights into recovery timelines. Analysis of the 2023 Gray and Oregon Road fires reveals significant challenges in insurance recovery processes. Of the 737 wildfire-related claims filed, 664 resulted in payments totaling \$212,188,637, with an average payment of almost \$320,000. However, the data reveals critical gaps: of the 244 claims that paid out 100% of their coverage, 75 did not have extended replacement cost coverage, indicating widespread underinsurance issues.

The Washington State analysis demonstrates that even when insurance claims are processed, underinsurance creates ongoing financial barriers to full recovery. This is particularly relevant for rural communities in the Columbia River Gorge, where property values may not reflect actual replacement costs under current building codes and fire-resistant construction requirements.

Please review and consider the true realities of a homeowner in 2025.

Thank you
Greg Faust

Columbia River Gorge Commission

PO Box #730

White Salmon, WA 98672

August 8, 2025

SUBJECT: Request for Amendment to NSA Replacement Structure Timeline - From Two to Five Years

Dear Chair, Vice-Chair, and Commissioners:

I write as a concerned citizen, living within the Columbia River Gorge National Scenic Area, to formally request an amendment extending the replacement structure timeline from two to five years for wildfire-damaged properties. This request is based on comprehensive empirical data demonstrating that current timelines are operationally inadequate and create unintended barriers to community recovery.

Executive Summary

Recent wildfire events in our region, combined with documented recovery data from Oregon and Washington, provide compelling evidence that the current two-year replacement timeline does not align with actual recovery operations. The 2025 fire season alone has resulted in 70 homes destroyed and over 1,200 residents evacuated across multiple NSA communities. Analysis of recovery timelines shows that basic site preparation requires 17+ months, leaving insufficient time for the permitting, planning, and construction phases necessary for thoughtful community rebuilding.

Current Situation Analysis

The summer 2025 wildfire impacts provide concrete examples of the timeline challenge:

- **Rowena Fire (Oregon):** Destroyed 56 homes and 91 structures, affecting a community where 59.4% of residents live in poverty and homeownership is only 23.5%
- **Burdoin Fire (Washington):** Destroyed 14 homes, threatened 250 more, and displaced 900 residents from the Lyle area

These events demonstrate both the scale of potential damage and the vulnerability of affected populations who require adequate time for comprehensive recovery planning.

Evidence Base: Oregon's Recovery Experience

The Oregon Department of Transportation's 2022 comprehensive analysis of the 2020 Labor Day Wildfires provides the most thorough documentation of wildfire recovery timelines available in the Pacific Northwest. Key findings include:

Operational Timeline Data:

- Site preparation and debris removal: 17 months (September 2020 through February 2022)
- Total structures affected: Over 5,000 homes and businesses
- Recovery operation costs: \$355 million (as of June 2022, ongoing)

Regulatory Framework Assessment:

- "ROE processes and practices were confusing to state and local agencies and the public, causing delays"
- "Oregon lacked an all-hazards hazard tree removal and debris management plan"
- Traditional regulatory frameworks "proved to be ineffective for hazard tree and debris removal operations"

Operational Insights:

- "The absence of pre-positioned contracts delayed the mobilization and deployment of resources"
- Extended operations resulted in significant mental health impacts on both emergency personnel and affected residents

Supporting Data: Washington State Insurance Analysis

Washington State's Office of the Insurance Commissioner analysis of recent wildfire claims reveals additional recovery challenges:

- **Claims processed:** 737 wildfire-related claims with \$212,188,637 in total payments
- **Average settlement:** Nearly \$320,000 per claim
- **Critical gap:** Of 244 claims paying 100% of coverage, 75 lacked extended replacement cost coverage

This data indicates that even successful insurance settlements often provide insufficient funds for full replacement under current building standards, creating additional timeline pressures that compound regulatory delays.

Regional Context and Trends

Washington State Department of Natural Resources data shows the 2023 wildfire season alone affected over 165,000 acres and damaged 400+ structures statewide. This pattern indicates that wildfire recovery is not an isolated challenge but an ongoing regional reality requiring systematic rather than emergency-based approaches.

Timeline Analysis: Current vs. Proposed Framework

Current Two-Year Timeline Constraints:

- Months 1-17: Site preparation and debris removal (based on Oregon data)
- Months 18-24: All permitting, planning, construction, and final approvals
- Result: Insufficient time for thoughtful planning and quality construction

Proposed Five-Year Framework:

- **Years 1-2:** Emergency response, site preparation, insurance resolution
- **Years 2-3:** NSA regulatory review, comprehensive planning, construction preparation
- **Years 3-5:** Construction phase accounting for seasonal limitations, supply chain realities, and quality completion

Benefits of Extended Timeline

Enhanced Scenic Protection:

- Adequate time for comprehensive scenic impact assessment
- Opportunity for meaningful community consultation and planning
- Integration with long-term regional resilience strategies
- Coordination of infrastructure improvements enhancing both safety and scenic values

Community Recovery Support:

- Accommodation of complex insurance settlement processes
- Time for exploring federal disaster assistance and nonprofit support programs
- Opportunity for innovative housing solutions requiring extended planning
- Reduced pressure enabling thoughtful rather than rushed decision-making

Administrative Efficiency:

- Reduced emergency processing and appeal situations
- Better coordination between Oregon and Washington NSA jurisdictions
- Alignment with documented operational realities reducing regulatory conflicts
- Preparation for future wildfire events through systematic framework development

Implementation Considerations

Immediate Application: The families currently affected by the 2025 Rowena and Burdoin fires would benefit from immediate timeline relief, providing regulatory certainty during an already challenging recovery period.

Regional Coordination: The simultaneous occurrence of fires across Oregon and Washington demonstrates the value of compatible recovery frameworks that enable resource sharing and coordinated planning approaches.

Precedent and Best Practices: Federal Emergency Management Agency authorization of extended recovery support for the Burdoin Fire acknowledges multi-year recovery realities at the federal level.

Conclusion and Formal Request

The empirical evidence clearly demonstrates that wildfire recovery requires more time than current regulations provide. Oregon's documented 17-month site preparation timeline alone consumes most of the current two-year allowance, leaving inadequate time for the thoughtful planning and construction that both communities and scenic protection require.

We respectfully request the Commission consider the following actions:

1. **Amendment adoption:** Extend replacement structure timeline from two to five years for all wildfire-damaged properties within the NSA
2. **Retroactive application:** Apply extended timeline to current 2025 fire victims to provide immediate relief
3. **Implementation guidelines:** Direct staff to develop procedures maximizing the benefits of extended timelines while maintaining scenic protection standards
4. **Regional coordination:** Establish protocols with Oregon and Washington agencies for seamless recovery support across jurisdictional boundaries

This request represents not merely an administrative adjustment but a fundamental alignment of regulatory framework with operational reality. The proposed five-year timeline serves both community recovery needs and scenic protection goals by providing adequate time for thoughtful, comprehensive planning.

We appreciate the Commission's consideration of this evidence-based proposal and stand ready to provide additional information or clarification as needed.

Thank you for your continued leadership in balancing community needs with scenic area protection.

Respectfully,

Gregory Faust

References:

¹ Oregon Department of Transportation. *2020 Labor Day Wildfires After Action Report: Oregon Debris Management Task Force*. July 2022.

² Washington State Office of the Insurance Commissioner. "Most Gray and Oregon Road fire victims were under-insured." 2024.

³ Washington State Department of Natural Resources. 2023 wildfire season impact assessment.

⁴ Federal Emergency Management Agency. "FEMA Authorizes Funds to Fight Burdoin Fire in Washington." July 21, 2025.

⁵ Oregon Public Broadcasting. "Burdoin Fire destroys 14 homes, threatens 250 more in Washington." July 21, 2025.