



Oregon

Theodore R. Kulongoski, Governor

Department of Environmental Quality

811 SW Sixth Avenue
Portland, OR 97204-1390
503-229-5696
TTY 503-229-6993

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Charlie Stone
Oregon Department of Forestry
Protection Bldg 2
2600 State Street
Salem, OR 97310

RE: DEQ perspective on establishing new Smoke Sensitive Receptor Areas (SSRAs)

Dear Charlie:

In our recent discussions on rule revisions to the Oregon Smoke Management Plan, much of the focus has been on the criteria for establishing new cities and communities that should receive special smoke protection (formally Designated Areas, now called Smoke Sensitive Receptor Areas). I would like to provide some clarification on our agency's perspective on this matter, and our interest to forward this letter to the Board of Forestry for their upcoming September 6th meeting to review proposed revisions to the plan.

One of the recommendations in the Smoke Management Review Committee Report of September 7, 2005, was the identification of special criteria for adding new Smoke Sensitive Receptor Areas. In making this recommendation, the Committee encouraged ODF to "establish clear criteria for defining DAs or alternate terms such as Smoke Sensitive Receptor Areas (SSRA) and criteria for them (e.g., population and proximity to prescribed burning as well as AQMA status). SSRAs could be defined as 'areas where smoke impacts should be avoided'." The SMRC provided no recommendation on whether new SSRAs were needed or not, only to suggest "criteria to consider" for identifying new SSRAs, and thus leaving this decision-making to ODF and DEQ.¹

In my capacity as DEQ's representative in the periodic review of the Oregon Smoke Management Plan, I have stated the importance of being "proactive" in continuing to protect the public from prescribed burning smoke. One of the keys to success of the smoke management program has been recognizing public sensitivity to smoke and continuing to make improvements to the program that balance the need for burning with significant growth in population, urbanization, tourism, and the increased public and political sensitivity that accompanies such growth, not to mention new air regulations that require greater protection of both public health and visibility.

¹ The SMRC was neutral on adding new SSRAs. When asked in Matrix Question F "Are Designated Areas and Smoke Sensitive Areas adequately identified?" and "Is there a problem?" the SMRC's only response was "There is not a problem from the standpoint of the protection of existing Designated Areas (DA) and Smoke Sensitive Areas (SSA)." In response to the question "Will there be a problem in the future?" their response was "Yes, because certain difficulties can be expected. It is not tenable that DAs and other smoke sensitive areas have been defined on an ad hoc or as needed basis without criteria as the state develops a new Smoke Management Program required under the Regional Haze Rule. Furthermore, the increasingly urbanized nature of Oregon's communities and populations will require rational and documented criteria for protection of cities and populations to meet statutory and ODF policies."

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In our recent discussions on establishing new SSRAs under OAR 629-048-0150 ("Criteria for Future Listing of Smoke Sensitive Receptor Areas"), ODF has favored an approach that would add a city or community to the SSRA list based primarily on reoccurring smoke impacts. DEQ has favored a more proactive approach of identifying cities of a certain size where smoke should be avoided in advance of any reoccurring smoke problems.

Having said this, the outcome of our discussions on SSRA criteria has been general agreement on a combination of both approaches. However, on criteria which automatically establishes an SSRA based on a city's population and proximity to a forest protection district, ODF favors a population size over 10,000, while DEQ favors a population size over 8,000. DEQ is pleased that ODF agreed to a population-based level for automatically establishing SSRAs. However, we believe the lower level would provide greater protection from smoke, and being only a difference of 2,000 would not pose any significant constraints on burning. For cities under 8,000, DEQ has agreed to support criteria that is based on prior documented smoke impacts and other criteria.

We look forward to continuing to work with ODF as we move towards completion of this periodic review of the Oregon Smoke Management Plan.

Sincerely,



Brian Finneran
Smoke Management and Visibility Coordinator
Oregon Department of Environmental Quality