



Oregon

John A. Kitzhaber, M.D., Governor

Department of Environmental Quality

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June 2, 1999

Charlie Stone
Assistant State Forester
Protection from Fire Program
Oregon Department of Forestry
State Forester's Office
2600 State Street
Salem, OR 97310

Re: Southwest Oregon Prescribed Fire Work Group Recommendations

Dear Mr. Stone:

Last November an air quality work group was formed to discuss issues related to future increases in prescribed burning in southern Oregon. This group, known as the Southwest Oregon Prescribed Fire Work Group, has identified prescribed burning as an important air quality issue in light of the new PM2.5 air quality standard and Regional Haze rules recently adopted by EPA. Members on this work group include representatives from the U.S. Forest Service, Bureau of Land Management, State Forestry, Sierra Club, Coalition to Improve Air Quality, and Oregon DEQ. The objective of the group was to identify the key air quality issues and concerns, and what possible actions may need to be considered in the future by federal land managers, state smoke management and air quality agencies, and others.

A series of four meetings were held. Much of the discussion focused on the importance of increasing the use of non-burning alternatives and emission reduction techniques, as well as identifying new ways to address potential smoke problems that may arise from both increased burning, interstate smoke transport, and greater reliance on understory burning. At our meeting on April 23, the work group developed a list of recommendations to forward to the Oregon Department of Forestry for consideration in the upcoming review of the Smoke Management Plan. These recommendations are listed below and discussed in detail in this letter.

- Improve Interstate Smoke Management Coordination with Northern California.
- Increase use of Non-Burning Alternatives and Emission Reduction Techniques.
- Revise (if necessary) Smoke Drift Restrictions in OAR 629-43-043.
- Develop special Smoke Management Guidance for Understory Burning.
- Full Use of the new SW Oregon Monitoring Network.
- Consideration of a Mandatory Smoke Management Program for Fremont and Winema National Forests.

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Although no additional meetings of the Southwest Oregon Prescribed Fire Work Group have been scheduled at this time, it is expected that future meetings will be held on an as-needed basis if prescribed burning or smoke management issues arise.

Recommendations

1. Improve Interstate Smoke Management Coordination with Northern California.

In our initial discussions on increased prescribed burning in southwest Oregon, we recognized the potential for burning in northern California becoming a major issue in upcoming years, given the proximity of the Klamath, Shasta-Trinity, and other forest land in that area. Our group was aware that historically some smoke intrusions into Medford and Grants Pass have resulted from prescribed burning originating in northern California. Based on these concerns we contacted several federal land managers and state air regulators in northern California, and learned that significant increases in burning are being planned, and that there is a strong interest in improving interstate smoke management coordination.

In addition we learned of a new regional group called the Northeast Air Alliance, made up of representatives from state, federal, private and county land managers, and local air quality districts, in an effort to address smoke management issues in northeastern California related to future increases in burning. A DEQ representative recently attended their last meeting to indicate the interest in improved interstate smoke transport coordination. The group was very receptive to improved coordination, and we are planning to attend future meetings of the NE Air Alliance.

In support of these efforts, our work group recommends as part of the review of the Oregon Smoke Management Plan that there be a strong emphasis on interstate smoke management coordination with northern California. This should include having a formal mechanism in place for daily notification and information sharing of prescribed burning activity in northern California and southern Oregon between appropriate smoke management and air quality staff. A description of this interstate coordination and mechanism should be provided in the Operational Guidance to the Smoke Management Program.

2. Increase use of Non-Burning Alternatives and Emission Reduction Techniques.

There was strong support in our workgroup for finding new ways to promote the use of non-burning alternatives, as well as increased use of emission reduction techniques in general. We discussed many of the economic and environmental issues and obstacles related to increased mechanical removal and utilization of forest slash. We recognize that currently federal land managers do employ non-burning alternatives in many forests, and that there are

examples of areas such as in the Deschutes National Forest where slash removal and utilization efforts have been successful. However, as prescribed burning increases greater use of non-burning alternatives is essential. Nowhere is this more important than in the "forest/urban interface" areas where the proximity of the public to burning poses the greatest risk in terms of both fire danger and smoke impact. There are many of these interface areas in southern Oregon, such as around the Medford-Ashland area and Grants Pass.

Our group recommends that expanding the use of non-burning alternatives be made one of the highest priorities in the review of the Oregon Smoke Management Plan. This could be in the form of identifying tax credits, grants or subsidies available for biomass utilization projects, or research into potential new biomass markets in the southern Oregon/northern California area. We believe the Operational Guidance to the Smoke Management Program should contain a commitment to practice non-burning alternatives, as well as list all emission reduction techniques currently available to federal land managers.

3. Develop special Smoke Management Guidance for Understory Burning.

Much of the current Oregon Smoke Management Program is based on burning under conditions which promote plume rise to a "mixing height" where transport winds blow smoke away from populated areas. Historically this criterion has applied to broadcast and pile burning. However, we understand that most prescribed burning in southwestern Oregon is shifting to understory burning. While understory burning produces less emissions than broadcast and pile burning, it typically results in poor plume rise and can cause considerable ground level smoke.

Our group strongly encourages ODF develop special smoke management guidance for understory burning. Such guidance should identify meteorological, smoke dispersal, and other conditions suitable for understory burning. We would recommend ODF to incorporate this guidance into the Operational Guidance to the Smoke Management Program.

4. Revise (if necessary) Smoke Drift Restrictions in OAR 629-43-043.

In southwest Oregon, the Medford-Ashland area and Grants Pass are protected as "designated areas." The smoke management plan rule (OAR 629-43-043) contains criteria for burning upwind of designated areas in the state. These criteria consist of certain distance, tonnage, and acreage limits, based on smoke drift and dispersion conditions. It is our understanding that these criteria were developed primarily for broadcast and pile burning.

Our group recommends that ODF revise the smoke drift restrictions in OAR 629-43-043 in light of our above comments regarding the shift to understory burning. Additionally, ODF

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should review of these restrictions as they currently apply to broadcast/pile burning to see if they need to be revised or updated.

5. Full use of the new SW Oregon Monitoring Network.

A new real-time monitoring network has been established for southern Oregon through efforts of the Bureau of Land Management and U.S. Forest Service, in consultation with DEQ. The purpose of this network is to identify potential ground and residual smoke impacts in valley floors and low elevation areas where increased prescribed burning is being planned. A total of five new monitoring sites have been established and will operate on a year-round basis.

We recommend that ODF smoke management staff make full use of these real-time monitors in making daily burn decisions, tracking smoke levels, etc., and that this be referenced in the Operational Guidance to the Smoke Management Program as well.

6. Consideration of Mandatory Smoke Management Program for Fremont and Winema National Forests.

Related to our concerns about interstate smoke transport from northern California (#1 above) our group discussed the possibility of smoke transport from prescribed burning in the Fremont and Winema National Forests. These two national forests are the only remaining forests in Oregon under a voluntary smoke management program. One member of our group advocated changing this program from voluntary to mandatory, in order to provide additional protection to the airshed east of the Cascades around Klamath Falls, as well as west of the Cascades around Medford. Others in the group did not believe there was sufficient information at this time to make this a formal recommendation. However, a smoke management workgroup was recently formed in Klamath Falls to review prescribed burning and local agricultural burning issues, in light of the new PM2.5 air quality standard. This workgroup is staffed by DEQ, and includes representatives from ODF, Forest Service, a local environmental group, local agricultural interests and the general public. They will be discussing prescribed burning in the Fremont and Winema National Forest, and assessing whether voluntary smoke management controls will continue to adequately protect air quality in Klamath Falls.

We support the efforts of this workgroup. Should this group conclude that mandatory smoke management controls are needed, we would also support making this change.

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The Southwest Oregon Prescribed Fire Work Group appreciates your consideration of these recommendations. Please call me if you have questions at (503) 229-6278.

Sincerely,



Brian Finneran
Member of SW Oregon Prescribed Fire Work Group
Air Quality Division

Other Group Members in attendance at 4/23/99 meeting
where above recommendations were developed:

Phil Frazee, Arbor West
Don Matlick, ODF Salem
Robert Palzer, Sierra Club
Jim Russell, BLM Medford District
Jeff Schwanke, ODF Southwest Oregon District
Wally Skyrman, Coalition to Improve Air Quality

cc: Ken Snell, USFS Region 6
Jerry Beatty, USFS Region 6
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Gordon Foster, Siskiyou National Forest
Bill Rose, Rogue River National Forest
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Mike Montero, Chair, Medford-Ashland Air Quality Advisory Committee
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