

Smoke Management Review Committee Meeting
Oregon Department of Forestry
Santiam Conference Room, Operations Bldg, Salem
0830-1500 March 18, 2004

In attendance: Stephen Fitzgerald, Erik Christiansen, Mike Dykzeul, Gregory McClarren, Stan Benson, Jim Brown, Brian Jennison, Brian Finneran, Jim Russell, Gary Stevens, Lee Miller, Mike Ziolk and Cindy Smith (notetaker).

Visitors: Harold Merrit, Mike White and Jim Trost.

1. Administrivia Mike Ziolk, ODF

2. Minutes

The following corrections were made:

Page 1: Bottom of the page, correct typo - “niutes” to “minutes”

Page 3: Midway down the page under Discussion, “Mike Dykzeul asked it” corrected to “asked if.”

Page 4: Public Comments; first line, correct “nor” to “no”.

Jim Brown moved and Stan Benson seconded that the minutes be approved as amended. The minutes were approved as amended.

3. WRAP Alternatives to Burning Report Brian Finneran, DEQ

Brian Finneran distributed copies of the Western Regional Air Partnership (WRAP) document *“Nonburning Alternatives to Prescribed Fire on Wildlands in the Western United States”*, as well as a one page outline/summary of the document describing what it is, how to use it, the organization of the document, primary considerations for evaluating alternatives and decision tree criteria.

The three purposes of the document are to: 1.) Meet the Regional Haze Rule that alternatives must be pursued, 2.) Assist in meeting the objective in the Smoke Management Plan – specifically the operational guidance that addresses pursuing alternatives and 3.) Could be incorporated into a process for evaluating alternatives.

Brian described the document as one of a kind with considerable potential and requested feedback from the Committee members at the next meeting, especially on Chapters three and four. Primarily he wanted the Committee to consider how the document could be used as it relates to the operational guidance of the Smoke Management Plan.

Discussion:

- Jim Brown commented that there was a tax credit program for use of alternatives.
- Greg suggested that if Brian wanted feedback on this document, it needed to be on a future agenda.
- Jim Russell noted that if this document is to be an appendix to the Smoke Management Plan, a mechanism/vehicle must be determined because of the size of the document. He suggested a CD that could be attached to the Smoke Management Plan and added that the report is an excellent reference and is “Good to go.”
- Jim Brown asked if there would be a mechanism to get this to the people operating on the ground such as a website including what would be coming because of the on-going nature of the technology.
 - Brian Finneran responded that nothing such as an Internet website had been set up but noted it was almost a necessity.
 - Stephen Fitzgerald added that a website would be a good repository for the most current version and noted the advantage of electronic edits in both cost and

accessibility. Electronic edits could be easily made as needed if it's done electronically and cd's are much cheaper than hard copies

- Brian Finneran noted that California already has a similar document on-line.
- Mike Ziolk commented that this document is on the WRAP website under forums – the FEJF. There has been no discussion regarding updating it at any of the Fire Emissions Joint Forum (FEJF) meetings but added that it should probably be brought up at the next FEJF meeting.
- Jim Russell pointed out that someone needs to take on the responsibility of maintaining the document, ODF or DEQ, so changes get made as needed.
 - Stephen Fitzgerald added that there is value in maintaining the document rather than redoing it every few years, both in keeping it current as an evolving document and for the fact that it is to be involved in a process which makes it all the more important that it be kept current.
 - Jim Brown asked if WRAP had someone to handle it.
 - The response was No.
 - Gregory McClarren added that the committee had agreed that they want the Oregon Smoke Management program to be the model in the west – need to review it – it's valuable... suggested that ODF take it over.
- Stephen Fitzgerald added that being able to link to it from other websites is important.
- Mike Dykzeul commented that it's a good baseline foundation and recommended asking Jim and Mike to go back as participants to the FEJF.
- Stan Benson cautioned that the document should stay a WRAP document.
- Jim Brown added that it should go back to WRAP
- Jim Russell said he didn't want to make more of it than it was intended to be – a reference document.
- Brian Finneran said he put commitment in the SIP that the state of Oregon would use this document as a reference tool in considering alternatives to prescribed fire and added that now EPA will be expecting DEQ to provide details on how that process will work – referenced in the Operational Guidance of the Smoke Management Program, referenced under the Administrative rule or not referenced at all but left as a general guidance but he noted that something needed to be decided regarding how it will be used.
- Lee Miller – it's a wonderful document for regulators but not for day-to-day operation. He didn't think people in the field would use it.
 - Stephen Fitzgerald asked if there was a way to make it useful for operators.
 - Lee Miller equated it to a textbook and was trying to think of a way to make it more useful for the land manager.
 - Stephen Fitzgerald said it's education and suggested a “skimmers” version.
 - Brian Finneran said considerable time was spent by the consultants collecting information from operators and looking at equipment being used.
 - Greg McClarren suggested a simple two pager for a layperson to understand.
- Mike Dykzeul noted that this would reach people who have not been able to get into the system of fuels treatment and offers credence and consideration of the kinds of treatment we should be using.
- Jim Brown added that it's good reference material and people in the field should be aware of all the alternatives.
- Should help improve public understanding.
- Mike Ziolk commented that it would be a reference tool for the infrequent burner to use.
 - Harold Merritt agreed stating – we (the private sector) already think we know what we're doing but it should be very helpful to the small woodland owner as a reference document.

- Stan Benson agreed with what has been said but questioned whether the committee was ready to decide where to use it and where it/if it should be referenced suggested that decision should be made later.
- Jim Russell stated that Federal land is managed based on the fact that there are major changes coming due to the Healthy Forest Restoration Act. He noted that it would be good to incorporate this document as they review their objectives. Jim added that the feds will be required to meet the requirements of the National Fire Plan and the Healthy Forest Act.

4. First Draft - "Are Burning Objectives Being Met" - Matrix B

**Mike Dykzeul
Gregory McClarren**

Greg McClarren and Mike Dykzeul presented the draft of their subcommittee report of Matrix Item B - "Are Burning Objectives Being Met?" (See attachment A.)

Greg McClarren said there were really only two key questions "Are burning Objectives being met?" and "Are air quality objectives being met?"

Mike Dykzeul added that he and Greg really had two tasks – first, developing this draft and second, being to develop the draft template for the write-ups of each of the Matrix items and noted that the draft is due in September.

Gregory explained that pages one and two are a background – envision this being the format all will follow for the final report. Greg wanted to keep this to two or three pages but it didn't work.

Mike Dykzeul explained that the issue statement may remain the same for each question and Greg suggested reviewing the template block by block.

Discussion:

Section A

Paragraph 1

- Jim Russell said he was impressed with the job they had done and noted that his comments were more political than substantive and asked how the template would be structured to reflect current policy.
- Mike Dykzeul explained that they had started with the original Directive - this is where we are today and at the bottom of page two they chart where we are going – goals and objectives.

Paragraph 2

- Stephen Fitzgerald suggested an example of what would be considered conflicting objectives.
 - Greg said it was left out in the interest of space.
- Greg suggested using Jim Russell's example of hazardous fuels reduction versus air quality objectives.
- Jim Brown – Who is going to read this...
 - Stephen Fitzgerald - The State Forester and the Board of Forestry. It is our essential work product for each question we were asked in the Charter plus some additional questions we added.

Paragraph 3

- Mike Ziolk pointed out that the last sentence should include changing visibility requirements in addition to changing particulate matter standards.

Paragraph 4

A short sentence that says a lot.

Section B - No comments/suggestions

Section C

Paragraph 1

- Greg McClarren noted that if the 80-20 rule is applied - it works.

- Jim Russell suggested that it would be relevant to note that the majority of open burning violations of NAAAQS in Oregon are related to wildfire... (Brian Jennison suggested calling them exceedences rather than violation...)
- Mike Dykzeul said he sees it as success of the system that they know when there is an exceedance.
- Stephen Fitzgerald suggested add a notation that to the paragraph in the last sentence – “mentioned by landowners” or “mentioned by persons who testified to this committee.”.
- Jim Russell noted that many of the complaints they receive are problematic relative to nuisance, etc, and may not be violations of the SMP nor the NAAQS and may not to be part of the template.
- Mike Ziolk – in Paragraph c – be aware that rangeland burning is not currently under our program.
 - Mike Dykzeul responded that it may lead to some of those areas – should the state be entirely under a program with the fees?
- Greg McClarren said we’re still setting the stage – rangeland management burning is a growing trend – it could lead to a policy question as to whether the committee wants to make a recommendation to include rangeland burning.
- Jim Russell suggested an introductory sentence “Burning for Forestry and rangeland management continues to be a viable tool. Under the current SMP, no reported NAAQS violations and relatively few, if any, intrusions have occurred on an annual basis. Forestry accomplishments seem to be at acceptable levels meeting statutory standards, although local accomplishments due to weather and proximity to AQMA’s continue to be mentioned by landowners. And we anticipate possible rangeland burning to occur in the future possibly needing to be included under the SMP.” He added it’s critical that we recognize who our audience is – DEQ.

Page 2

Paragraph 1

- Erik Christiansen questioned the decline of funding statement – federal; funding has remained fairly steady
 - Stephen - state funding, general fund has declined.
- Response from Jim Russell responded that lump sum funding was requested by federal agencies rather than per acre fees.
- Jim Brown noted that “(PM2.5 from” at the end of line three should read “(PM2.5 rather than”.
- Gary Stevens suggested putting the general proportion of Smoke to the PM 2.5.
- Brian Finneran said the information is available but asked if they want that much detail
- Gary Stevens said it would provide clarity.
- Greg McClarren said he and Mike Dykzeul would work on that phrase.
- Mike Dykzeul suggested that would be more captured in an introductory statement from the committee in looking at trends.
- Erik – asked Gary if he meant the proportion the PM 2.5 and below created by Presided burning in the total air shed?
 - Gary replied yes.
- Gary Stevens added that more background PM 2.5 would impact us.

Paragraph 2

- Brain Finneran said the paragraph could be revised to be simpler or revised to be more detailed, more accurate. If the latter, we need to say “Federal Visibility regulations have evolved from Phase 1 Visibility Rules, but, Phase 2 Regional Haze Rules” or could simply say “Federal protection has evolved.” Technically the Oregon Visibility

plan adopted 15 years ago was Phase 1 visibility rules that looked close impacts in the Class 1 areas from any pollution sources. . Phase 2 was looking at the Regional Haze problem – multi-state. Brian will provide a re-write of the paragraph.

- Gregory McClarren noted that is important to show the history and evolution
- Mike Ziolkko noted that Phase One and Phase Two probably only have meaning for the committee and staff.
- Jim Russell noted that the paragraph could be important due to 309 and SIP approval... Need to be very careful how we structure that paragraph - it establishes timing.
- Greg McClarren said there is a huge amount of expectation – partly because of what the WRAP has done, partly out of what the EPA is expecting in the regional haze rule about alternatives to burning. Greg noted that he and Mike Dykzeul feel that based on writing this that there is a great expectation that less burning will occur in the state based on the phrase “alternatives to burning”. But with the program trend being to increase burning, there was a potential for a collision course. and the recognition of burning increasing.
 - Brian assured him that the EPA was not expecting decreases
- Stan Benson – Questioned the use of he word untested... and noted that in many respects they are tested but economics say we can’t use these practices at this time.
 - He was asked if it would it help if it said “untested on a landscape scale”?
 - No
 - Stephen Fitzgerald asked if something to the effect of they have been tested but not implemented on both a landscape and widespread use.
 - Jim Russell – suggested change in sentence...current economic trends effect utilization and they vary widely from year to year.
- Greg McClarren noted Visibility protection has moved from to visibility protection plan 4 months of the year in 13 areas of the state to a statewide issue year round.
- Jim Brown said visibility noted that what’s economically feasible is what people are willing to do.

Paragraph 3

- Stephen Fitzgerald suggested inserting a definition of “Best day burning”.
- First sentence – rather than “better” – use the word “new” in the first sentence.
- Stan Benson found the paragraph to be cumbersome and in need of wordsmithing.

Paragraph 4

- Fourth line – should read “Demographic changes are leading to complaints of any level of smoke.” – leave out visible, smelled or seen.

Page 2

Current Standards – Goals and Objectives (proposed)

- The first sentence is a goal.
- The second sentence should be changed to reflect that it refers to the goal or be moved elsewhere to indicate an objective.

Page 3

Committee Validation Questions

Bullet 1 – Yes

Bullet 2 – Yes, for reporting and fees

Discussion:

- Stephen noted there may be a legal (statute) question.

Bullet 3 – Yes - conceptually, but need a definition of rangeland.

Discussion:

- Harold Merrit noted that they do follow the SM guidelines

- Class 3 forestlands just means they pay a different assessment rate.
- Mike Dykzeul read the definition of Class 3 land – “Agricultural class that includes all forestland primarily suitable for grazing and other agricultural use.”
- Jim Russell asked if we knew how many acres in the restricted are rangeland?
- Stephen Fitzgerald – within the restricted area they would be burning oak, oak savannah, maybe some remnant native prairie and agricultural land.
- Erik suggested the term “native cover” – and asked do we want the SMP to encompass burning of native cover?
- Jim Brown noted that “native cover” refers to what is currently there.

Bullet 4 – Yes

Discussion:

- Jim Brown – Yes we should change the terminology from restricted to regulated.
- Jim Russell – said it’s political nightmare... if we make the entire a state a regulated area – everyone would have to get burn permits..
- Greg McClarren said there to many terms and suggested simplify – drop the word restricted.

Bullet 5 – Yes

Discussion

- Mike Dykzeul – Should the entire state be part of the restricted area... and regulated under the SM plan?
- Mike Ziolk – in statute it says the State Forester shall designate restricted areas (it’s plural) and we could have different regulations attached to each area.
- Greg McClarren noted that then the Bend RA could have different regulations than say NE Oregon
- Stan Benson– covering the entire state doesn’t bother him. The fact that we haven’t documented a problem from rangeland burning doesn’t mean there were or are not any. They should have to get a permit – maybe not fees but it would keep ODF aware of activity. Reporting would provide a big umbrella and we would no doubt see that there are problems in terms of interstate impacts.
- Erik Christiansen said he was trying to visualize it – in no man’s land – not ODF protected land – How would this be received?
- Mike Dykzeul noted people are coming together over issues – it’s a process – regulations are coming statewide – it would bring them into the fold – may have only minimal fees – smoke knows no boundaries and does have impacts – how do we get them on board.
- Brian Finneran cautioned that whenever DEQ heads in the direction of change – statutory change is a last resort.
- Jim Russell – the issue is not charging fees but regulating all burning. We loose opportunities when other burning is going on and need coordination of all burning in the state of Oregon.
- Greg McClarren noted seed growers are directly affected by non-regulated agricultural burning in the Central Oregon Area and have to curtail their burning.
- Stephen: Back to the question of Restricted vs Regulated
 - Jim Russell – need to include the vehicle – an example – regulated area, restricted area.
- Greg – it should be done and currently it is not coordinated
- Jim Russell asked if ODF is willing to go out and coordinate with everyone.
- Gregory McClarren said ODF would be the best one to do this – they have the least political baggage.
- Jim Russell noted that the second bullet would add a lot of responsibility to ODF.

- Gregory McClarren added that ODF has the model SMP for the western United States.
- Lee Miller asked where would the funding come from.

Bullet 6

Discussion:

- Stan Benson noted that fees are very difficult to initiate and suggested using reporting as a way to gather information.
- Mike Ziolko said he has concerns and suggested thinking of services in terms of what you are asking ODF to do in terms of support of that other burning that we don't currently do.
- Jim Russell said an incremental approach is needed. He would ask Mike Ziolko to come up with the costs of what it's going to cost to implement the program.
- Brian Finneran said he wouldn't move forward without information on potential impacts – Nevada is working on Regional Haze Plan and will be looking across the boarder at burning in Southern Oregon.
- Gregory McClarren suggested a staged approach with no fees in the first stage of implementation.
- Mike Ziolko – to include forestland on the eastside – would that have a fee?
 - Greg McClarren suggested they would have to be included in the restricted area but rangeland would not have a fee in phase one.
 - Mike Dykzeul said he would not want fees for any new burning – forest or rangeland but would require a permit at no fee
 - Mike White (CFPA) noted that if we start adding more areas – will add a considerable workload to the field and asked where the money would come from?
- Gregory McClarren suggested the committee table this issue
- Jim Russell said he disagreed and said that there is a need to pay a higher level of fees to accomplish the level of coordination needed across the state. The decision needs to be made. Look at it in terms of services to be expected rather than fees to be paid.
- Stan Benson directed his comments more to the rangeland owner – no fee for them
- Gregory McClarren and Mike Dykzeul will work on this and make a proposal at the next meeting.

Bullet 7

Discussion:

- Mike Dykzeul said any kind of burning contributes to overall smoke and any kind of burning should be tracked and pay into the system. Devise a type of fee structure based on type of fuels that would be commensurate with the emissions that would be generated.
- Jim Russell – re-allocate according to the cost of operating the program.
- Stephen Fitzgerald said a couple of things could be done - a flat fee to administer the plan and an additional fee adjusted by high, medium or low fuel loading.
- Jim Russell commented that you couldn't charge the same for rangeland as you would for forest land because of the lesser value of rangeland.
- Mike Dykzeul asked if would you get caught up in reporting volume vs. acreage.
- Greg McClarren pointed out that guests at these meetings had said that there appeared to be a problem in accurately estimating tonnage – maybe should be cubic measurements taken on the ground and the type of fuel and then let the field people determine the tonnage
- Mike Ziolko said that's already being done. Researchers established the photo series to determine consumption.

- Jim Russell pointed out that the clean air act is specific. It says that the states can collect fees. There are two functions and want to keep them separate – the fee structure vs. the smoke management program.
 - Greg asked “Are you in agreement that there needs to be differentiation between types of burning?”
 - Jim Brown said he has a problem with acreage – it’s paying to pollute and only a certain amount of smoke can go in the area each day – too many variables using acreage
 - Gary Stevens noted there needs to be a consideration for burning dry versus wet material.
 - Gregory McClarren said he and Mike Dykzeul propose that there should be no exemptions to fees under the existing SMP – the committee voted agreement.
 - Stan suggested that there are some statutory changes that need to be made and move forward.
 - Mike White commented that it’s on a per acre basis now and that’s easy to track and said that if go to per tonnage basis they will see less accuracy in tonnage reported....

Bullet 8

Discussion: Committed voted Yes

- Mike Ziolk clarified that this would allow for prioritization of burns under certain circumstances.

Bullet 9

Discussion:

- Jim Brown asked “If we end up with a large concentration of burns in a small geographic area, would that create a problem?”
 - It would be left to the field person and the meteorologist to make the determination on burns.
 - Mike Ziolk said this would take tonnage and distance requirements out of the rule and may require a statute change. The statute says the Plan is to include considerations of tonnage.
 - Gregory McClarren disagreed.
 - Jim Russell said it’s a 50 year old concept and an issue that doesn’t look at technology - should drop it since it causes confusion.
 - Mike Ziolk – ODF is not using the limitations now because they are outdated and the parameters were too liberal and created problems.
 - Lee Miller – agreed with Jim Russell.
 - Stan Benson suggested putting it in guidance and let it go
 - Brian Finneran said they Committee could make protocol for prioritization and incorporate those kinds of things.
 - Mike Ziolk said he thought the prioritization issue was for when there were multiple burns on the same day.
 - Stephen said may need a couple of levels of prioritization.
- Gregory McClarren said the SMP has to be focused on end product. Are AQ and land management objectives being met? So, do we eliminate the tons/area and distance from the Designated Area rule? YES
 - Essentially we are advocating the “best burning day” concept, as determined by local conditions.

Bullet 10

Discussion:

No longer relevant – covered in previous bullet.

Page 5

Committee Recommendations:

Bullet 3:

Discussion

- Erik Christiansen commented that the PNWCG photo series has been updated. There is not one for piles. He showed committee members a copy and said they were available to anyone through the Cache in Boise.(NIFC)
- Greg suggested it should be available on the web.
- Jim Russell said it was expensive to keep it on the web but he would look into it.

Second to the last bullet –

- Jim Russell suggested replacing “should all contribute...” with “will be coordinated and should be ...”
- Brian Finneran – suggested adding a recommendation that encourages alternatives to burning.
- The Committee discussed and agreed that there should be no exemptions from fees in terms of forest health exemptions.

Gregory McClarren and Mike Dykzeul will re-write the template.

5. Public Comments

There was no public comment at this time.

6. Break

7. Develop Matrix Results

All

Following discussion the Committee Agreed to work on Matrix Items A and K

A work group was suggested by Greg, Brian disagreed. Gary Stevens suggested completing this

Matrix work at the meeting, keeping in mind the work done by Greg McClarren and Mike Dykzeul.

See Attached Matrix.

Discussion and Updates to the Matrix:

(Brian Jennison noted that Item A was the Committees charge and Item K - Intrusions, Visibility and Nuisance/Complaints were added to the Charter Questions by the committee. He suggested that the way to write this up would be to say, as a subset of A, we are meeting the standard, but, there are these three considerations. As a committee we want the Smoke Management Plan to consider these, intrusions, visibility and nuisance, in addition to the NAAQS.)

1) Is there a problem?

Brian Finneran suggested taking out the yes/no and replacing with statement of fact. – see his comments below.

Matrix Item A – Are Air Quality Standards Being Met?

- Brian Jennison noted that The Governor’s letter to the EPA Administrator recommends that all lands of the State of Oregon be declared attainment or unclassifiable.

Matrix Item K – AQ Objectives - Intrusions

- Jim Brown – Historically there has been a decrease at least in terms of intrusions over the last 10 years.
- Mike Ziolk pointed out that that the difference between Town A, which is not a designated area, and a designated area is that you count smoke into a designated area as an intrusion for ODF reporting purposes.
- Jim Trost presented a chart of Intrusions over time showing a definite decrease over the past number of years.

- Jim Russell – most intrusions are ocular – that’s how intrusions are documented.
- Gregory McClarren pointed out that documentation of an intrusion is all “in the eye of the beholder” and could readily be put on the web with a photo series to match what the person is seeing to determine the visibility reduction and a form to fill out and send in electronically.
- Mike Ziolko said the one of the beauties of the current system is that it is very consistent with what is used for intrusions in field burning.
- Brian Finneran - Intrusions have declined over time – see Annual Report.

Matrix Item K – AQ Objectives – Visibility

- Brian Finneran – DEQ Data (from nephelometers) did not show conclusive trends.

Matrix Item K – AQ Objectives – Nuisance /Complaint

- Gary Stevens said nuisance complaints should be tracked better
- Brian Finneran - It’s inconclusive - complaints aren’t tracked.
- The Nuisance Bullet should be changed to Nuisance/complaints for clarification. Complaints are the method of tracking nuisances.

2) Will there be a problem in the future?

Matrix Item A – Are Air Quality Standards Being Met?

- Gary Stevens said many areas have attainment plans and many of those plans may be controlling background and increased burning in those areas may impact those plans.
- Population growth and possible increases in burning may impact background concentrations both spatially and temporally specific.

Matrix Item K – AQ Objectives – Intrusions

- No comment

Matrix Item K – AQ Objectives – Visibility

- No comment

Matrix Item K – AQ Objectives – Nuisance/Complaint

- No comment

3) What are the Options to Deal With It?

Matrix Item A – Are Air Quality Standards Being Met?

- Better tracking and communication between agencies.
- Gary Stevens - DA or not, we need to manage the smoke so it doesn’t get to where people live. If a complaint is registered it should be used as a quality control method. If we don’t manage the smoke it will manage us. Use the information for quality assurance process with a feedback loop.
- Jim Russell - Where do we want to clamp down? What is the source? How is the burning being done? Make recommendations from that.
- Expand the Smoke Management Program in some areas.

Matrix Item K – AQ Objectives – Intrusions

- Greg McClarren suggested a web-based easy response system of tracking for intrusions, visibility and nuisances.

Matrix Item K – AQ Objectives – Visibility

- No comment

Matrix Item K – AQ Objectives – Nuisance /Complaint

- Jim Brown – Need to increase monitoring for tracking.
- Jim Russell asked if we want a tracking system for each burn?
- Gary Stevens said we need a quality assurance process to avoid health affects.
- Jim Brown – There is no control for backyard burning and that smoke can go for miles.

4) Will it require change in rule, statute or directive?

Matrix Item A – Are Air Quality Standards Being Met?

- Yes – statute, Rule and Directive

5) What are the barriers and opportunities?

Additional Barriers:

- Acceptance/compliance by landowners and tribes
- Willingness of ODF to take on an expanded program.
- Experience/Focus of ODF is not as sharp in burning of non-forest lands (rangelands) – assuming ODF controlling rangeland and forest burning and ODA controlling Ag burning.
- Complicates the prioritization of rangeland and forest burning – assuming ODA controlling Ag burning.

[Note: Agenda Items 8-10 were a continuation of Item 7 and included there.]

11. Develop Matrix Results (cont.)

Section Assignments:

- A work group including Gary Stevens and Brian Jennison with Brian Fi8nneran and Lee Miller for guidance/review will work on the report of Matrix Items A and K
- Erik Christiansen, Lee Miller and Jim Russell will write the report on Matrix Item C and report on May 27.

Additional meetings were scheduled as follows:

- July 21 at 08:30 – 15:00
- August 26
- September 30

12. Public Comments

There was no public comment at this time.

13. Adjourn

The meeting adjourned as scheduled at 15:30

Next Meeting April 15, 2004

Committee information may be found on the web at:

http://www.odf.state.or.us/DIVISIONS/protection/fire_protection/smp/SMR/SM_Review.asp

10-03-2004

Smoke Management Program Review

2003-2004

Template for Charter Review Questions

Charter Question “B”:

Are burning objectives being met?

Background and discussion highlights:

A. Issue origin - Directive-Objective (1-4-1-601)

“To prevent smoke, resulting from burning on forest lands, from being carried to or accumulating in designated areas or other areas sensitive to smoke; to provide maximum opportunity for essential forest land burning; to coordinate with other state smoke management programs; to conform with state and federal air quality and visibility requirements; to protect public health and to encourage the reduction of emissions”.

The present [1992] Smoke Management Program (SMP) is challenged in balancing diverse and sometimes conflicting objectives. It was revised in a time when forestry as practiced in the State was mostly of a conversion from old growth to regulated second growth forests, and before the wildland urban interface [WUI] issue and the forest health/restoration efforts further challenge policy and program accomplishments.

Geographic differences are not only limited by topographic needs but also by demographics, base ownership, increasing populations, atmospheric and weather conditions, land use restrictions and a growing smoke sensitive population. Program needs are also challenged by conflicting objectives, funding, technology, staffing, public education, regulations and changing particulate matter standards.

The landscape of forest and rangeland management continues to evolve faster than the SMPs’ ability to adjust.

B. Participants, Stakeholders and Regulators

There are a variety of participants, stakeholders and regulators involved in Smoke Management. They range from individual citizens and local community entities to state and federal agencies to not for profit associations and large and small landowners.

C. Relevant facts/trends

Burning for forest and rangeland management continues to be a viable tool with NO reported NAAQS violations and relatively few, if any, intrusions on an annual basis. Forestry accomplishments seem to be at acceptable levels meeting statutory standards, although local accomplishments due to weather and proximity to AQMAs continue to be mentioned.

C. Relevant facts/trends [cont'd.]

Recent efforts to promote forest health and Wildland-Urban Interface (WUI) risk reduction has the potential to increase burning in proximity to populated areas. Health research is focusing on smaller particulate matter (PM 2.5 from PM 10). Public funding (General Fund) for state and federal programs continues to decline across the board.

Visibility protection has now evolved into Phase I of Regional Haze Rules [RHR] and Phase II is due in 2008. RHR emphasis continues on establishing emission goals, likely with annual reduction expectations, rather than maintaining stated standards and objectives. High expectations exist for 'Alternatives to Burning' but the economics and utilization strategies are untested.

Adoption of better science, technology, and education plus improved coordination and communication, Emission Reduction Techniques (ERTs) along with adoption of 'best day burning' guidelines can minimize potential operational impacts while meeting health and visibility objectives.

Geographic variations in fuels, weather patterns, population & demographics, public-private-homeowner management objectives and current limitations as well as adjacent communities, states and regions can impact SMP decisions. Demographic changes are leading to vocal concerns at any level of smoke visible, smelled or seen. "Not in my back yard" is increasingly heard. Significant population increases in the WUI areas have occurred throughout the state mostly adjacent to forestlands.

Current Standards:

There are a variety of OARs and Department Directives governing the Program. The parent Statute was enacted in 1969 with current Program Directives and Rules last updated in 1992. Some lie in ODF purview while others are in DEQ and ODA.

Goals & Objectives [PROPOSED]

To provide the maximum opportunity for land management objectives to be met while maintaining air quality, health standards and visibility objectives. These objectives cannot be assured in all cases but can be managed more effectively with improved coordination, communication, technology, public education and maximizing optimum burning conditions whenever possible.

Committee Validation Questions:

- Does the Committee concur with the proposed goal and objectives in prior section?
- Should rules expand from only Class 1 forestland to all forestland?
- Should “rangeland” be included to Restricted Area focus?
- “Restricted” or “Regulated Area” terminology?
- Should the entire state be made part of the “Restricted Area”?
- If the entire State is within ‘restricted area’ then should fees for the expanded area be initiated? Registration fees only? Or all?
- Should fees per types of burning or location be established and fees set appropriately to match emission levels? E.g.: pile (old growth or second growth), broadcast, underburn 1st entry VS maintenance, habitat restoration, or other?
- Should a Protocol for Prioritization be developed and included?
- The tonnage limit per 150,000-acre block is outdated. Instead a 10/30/60-mile radius area or airshed is proposed. A 30-mile circle represents 1.8 million acres. Are tonnage increases to this higher acre figure still proportional?
- Past interpretation of increases by distance..... When going to next level is it “in addition” or new total?

Matrix Questions: Narrative Description

Is there a problem?

Not consistently at present, however, some industrial landowners [especially within a sub-region] believe there is due to ‘tonnage limitations’ and ‘carryover costs.’ Yet, no conclusive data exists to indicate a consistent problem with attaining forest and range management goals e.g. statutory reforestation standards. Other stakeholder’s e.g. Federal owners in SWO and eastside state “folks just don’t understand what we’re trying to do for them in fuel reduction.” The more urban or populated the area the greater the likelihood for issues.

Will there be a problem in the future?

Probably and it will grow. In fact, industrial lands burning levels remain static and Federal ownership patterns do not seem to be approaching historic levels [acres or tons; more agencies do seem to be burning]. Agriculture burning trends, in fact, are significantly below prior decades. Yet, there is evidence of:

- more WUI areas state-wide;
- more burning especially on Federal lands in and out of current ‘restricted area’;
- greater number of ‘populated areas’ and ‘urban centers’ [neither well-defined];
- poorly integrated regulations and loosely defined jurisdictions exist between Municipal, State and Federal authorities;
- outdated fuel photo series estimation;
- more accurate tonnage estimation, better spot or micro-forecasting as well as improved emissions tracking is needed;
- increasing restrictions in Air Quality and human health matters e.g. PM2.5 revisions and adopted Regional Haze Rule; and
- more ‘NIMBY-ism,’ more ‘sensitive populations’ and more areas are moving to ‘designated areas’ status.

What are the options to deal with it?

- Adopt ‘best burning day’ strategy.
- Delete tonnage limits and replace with tonnage guidelines based on ‘best day burning strategy.’
- Eliminate 150,000-acre administrative unit limitations and replace with 10/30/60-mile radius guidance tied to existing key weather conditions.
- Develop a restricted area or designated area protocol that can be revised as needed based on annual review and monitoring [e.g. adaptive management].
- Expand SMP to encompass all forestlands in the state and wildlife/range land burning done by Federal and state agencies. Consider large industrial private landowners [range/ranch operations].
- Invest in improved technology for forecasting, communication, tracking, monitoring and public education.
- Develop a fee schedule that is both equitable and encompassing of emission sources e.g. by future burning type and across all ownership.
- Prepare for RHR Phase II in 2008 including an Oregon-wide smoke program with integrated statewide forecasting and tracking system.

Will it require changes in rules, statute or directive?

Yes, especially with regard to the OAR and Directives even if the Smoke Management Program remains solely a forestry program. If a more coordinated and encompassing approach is recommended for overall ‘smoke management’ then a larger change to the Statutes, OAR’s and Directives is certain.

What are the barriers and opportunities?

Barriers:

Natural resistance to change and increased regulation, perceived loss of individual Departments’ programs, technology and funding.

Opportunities: Streamlined program [rather than many programs], more effective & greater efficiencies, consolidated OARs and Directives, able to respond better and perceived by citizenry as more credible. Greater equity among stakeholders and participants.

How will success be measured in the future?

- Land management objectives met
- Landowners real & perceived complaints decrease
- NAAQS met
- Nuisance visibility problems not increased [even though burning increases]
- Greater public ‘acceptance’ of burning as critical management tool that is well-managed.
- Oregon’s SMP is a ‘model’ program for accomplishments and AQ protections.

Do we have data or technology Gaps? **Yes!**

- in forecasting at project level and the tracking of emissions real-time; and
- at more accurate fuel loading estimation [and maybe emissions/consumption].

Committee Recommendations: *“to promote burning objectives being met”*

- Maximize optimum mixing and direction burning opportunities, develop “best day” strategies.
- Improve forecasting and tracking capability through technological advances, (e.g. Sodar, Blue Sky) and field data measurements, pi balls, maybe even unmanned reconnaissance aircraft [ala Iraq & Afghanistan].
- Assess potential improvements to “Photo Series for Quantifying Forest Residue” and tonnage estimations or volume calculations by pile dimensions to improve accuracy and consistency.
- Assure that ERTs are both legal and encouraged. (Pure PE, petroleum products)
- Develop a prioritization protocol to enable local managers to use Department guidance.
- Eliminate references to “per 150,000 acres on any one-day.” Replace with guidance estimations for 10/30/60-mile radius from DA’s.
- All types of forestry, rangeland, underburning, maintenance, fuels reduction, habitat restoration and forest health burning within the “Restricted Area”, should all contribute to the SMP funding base. These fees should be commensurate with the emission volumes produced from these individual activities.
- Prior ‘committee validation questions’ may result in additional recommendations

Responses to Questions - Updated 3/18/04

| | Is there a problem? | Will there be a problem in the future? | What are the options to deal with it? | Will it require changes in rules, statute or directive? | What are the barriers and opportunities? | How will measure success in the future? |
|---|---|---|---|--|---|--|
| A. Are air quality standards being met? | <ul style="list-style-type: none"> No. Standards are met. Governor letter all state be declared "attainment" or unverifiable. Need to identify trends around the state. | <ul style="list-style-type: none"> Possibly due to: <ul style="list-style-type: none"> Population Growth Possible Incr in burning – spatially and temporally specific Chg in PM2.5 Std/visibility Potential impacts to maintenance areas Neighbors to the south (CA) and east (ID) will be burning | <ul style="list-style-type: none"> Better forecasting → Better idea of fuel loading & consumption → Blue Sky → Operational Flexibility → Use alternatives where appropriate → Expand the Smoke Management Program in some areas → | <ul style="list-style-type: none"> NO Directive Change Directive Change Rule Change Rule Change Statute, Rule & Directive change | <p>Barriers:</p> <ul style="list-style-type: none"> Funding (personnel) Training Acceptance / Compliance by landowners & tribes Willingness of ODF to take on an expanded program Experience/Focus of ODF is not as sharp in burning of non-forest lands (rangeland) – assuming ODF controlling rangeland and forest burning, and ODA controlling Ag burning) Complicates the prioritization of rangeland and forest burning - assuming ODF controlling rangeland and forest burning, and ODA controlling Ag burning) <p>Opportunities:</p> <ul style="list-style-type: none"> Coordination Take adv of burn days | NAAQS met |
| B. Burning objectives being met? | <ul style="list-style-type: none"> Not always, but fuels treatment needs may be met. | <ol style="list-style-type: none"> More burners (NPS, USFS, BIA) Desire to burn more acres new AQ regulations | <ul style="list-style-type: none"> Same as above → Relax Standards → Prioritize burning <ul style="list-style-type: none"> - by landowner → - by regulator → | <ul style="list-style-type: none"> Same as above ALL - Directive - Rule | <ul style="list-style-type: none"> - same as above - Political/jurisdiction (barrier) More burn days (opportunity) - Reaching consensus (barrier) More efficient use of burn day –opportunity | <ul style="list-style-type: none"> Land objectives met NAAQS Met Nuisance visibility problems not increased |

| | Is there a problem? | Will there be a problem in the future? | What are the options to deal with it? | Will it require changes in rules, statute or directive? | What are the barriers and opportunities? | How will measure success in the future? |
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| B. Burning objectives being met? (Cont.) | | | | | Antitrust – barrier - Funding, Personnel – barrier Improve tracking – opportunity | |
| C. (rephrased at Sue S. suggestion) Evaluate the SMP 1. Underburn increase (yes) 2. Re: forest health | <ul style="list-style-type: none"> • Problem quantifying acres/tons burned. • Fees (connection with economic & funding) • Management of unplanned ignitions (i.e. not addressed) • Adjust forecasting of smoke dispersion. • Hardware for measuring atmospheric info. | <ul style="list-style-type: none"> • Same as current situation | <ol style="list-style-type: none"> 1. Refined Forecasting 2. Better idea of fuel loading and consumption Preliminary mechanical treatment 3. Collect Fees | <ul style="list-style-type: none"> • None • Directive • (Optional for landowners) • Statute & Rule Changes | <ul style="list-style-type: none"> • Funding, Technology, Personnel – barriers More burning – opp • Training & Tech – barriers More burning – opp • Less Smoke –opp Better utilization– opp Cost – Barrier • Political – barrier Streamline Fee Collection Better Prog Mgt – opp | <ul style="list-style-type: none"> • Same as above • Fees match services required (self sustaining) for increased program |
| E. Evaluate the SMP re: regional AQ issues? | <ul style="list-style-type: none"> • Problem – Does not address regional issues other than Washington. • Problem – does not address Ag or range burning in or out of state. | <ul style="list-style-type: none"> • Yes – because of 309 requirements • Regional Hazel Rule • SW Idaho, NE CA & SE WA concerns & the Gorge | <ul style="list-style-type: none"> - Daily SM coordination between states including agreements - Try to make contact w/ tribes - enhanced SMP - other types of burning | <ul style="list-style-type: none"> • Directive and /or rule • ? new ground • Rule – SIPs • Rule | <ul style="list-style-type: none"> • Funding to ramp up and operate program • Bring in new clients Barrier – resistance • Cover all smoke emissions w/in the State & improve coordination • Bring in new clients Barrier – resistance to new regulation | <ul style="list-style-type: none"> - All landowners treated fairly - no haze or intrusions - fewer interstate impacts - meet 309 requirements/standards - shared responsibility/equity the public shares a portion of this responsibility |
| D. How should wildfire vs. prescribed fire impacts be addressed? | <ul style="list-style-type: none"> • Current plan is silent on the issue. • Concepts and related issues are “new”. • No mechanism to allow PF impact in lieu of WF impact. | <ul style="list-style-type: none"> • Current plan does not allow logical trade off analysis | <ul style="list-style-type: none"> • 12 month SMP • Improved site specific analysis – forecast • Need to look at the WUI treatment • Alternatives to burning | <ul style="list-style-type: none"> • It exists • No • Maybe (rule) • Maybe | <ul style="list-style-type: none"> • Funding needed • Balancing priorities (this) needs to be determined in local area • Research/funding/ legal appeals | <ul style="list-style-type: none"> - More fuel reduction, less wildfire w/ equal or less emissions - How did 3 – yr pilot work? Violations of NAAQS? Acres at what cost? - Are planned burns completed? – can we |

| | Is there a problem? | Will there be a problem in the future? | What are the options to deal with it? | Will it require changes in rules, statute or directive? | What are the barriers and opportunities? | How will measure success in the future? |
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| D. How should wildfire vs. prescribed fire impacts be addressed?(Cont.) | | | <ul style="list-style-type: none"> • Improve Science, emission estimations, & forecasting • Develop protocol for complaints/nuisances and track it • Tool/process to allow for a cost/benefit analysis from emissions perspective with a long term vs short-term. • Education – why we prescribe burn or do other fuels treatments | <ul style="list-style-type: none"> • No • Directive • No • Maybe (Directive/Rule) | <ul style="list-style-type: none"> • Tech development & funding • Protocol for tracking complaints. Not currently very well coordinated – need to modify existing system - Opportunity to educate the public • Opportunity – existing tools – FETM or equivalent. Barrier – req more staff time & what will be done w/info • Barriers- Additional funding would be needed. Might need a third party to do it • Can't change NAAQS (– and don't want to). • Coordinated common system for all sources of emissions (ag, forest, backyard) | <p>measure this?</p> <ul style="list-style-type: none"> - Need to have entire state report. - Fewer complaints. - More burns done. - Better, more informed decision making – “this could include using more alternatives - SMP acknowledges trade off between PF and wildfire - Better coordination/less competition for burn days between landowners and agencies. |
| F. Are designated areas and smoke sensitive areas adequately defined? | <ul style="list-style-type: none"> • Adequately protected but not adequately defined. • Linkage needed between DA,SPZ, non-attainment, protected area, and parameters that identify each. • Public safety - roadways • Issues/Questions - Different labels - SPZ, DA, etc - Maps need to be better | <p>Yes</p> <ul style="list-style-type: none"> - Population growth may change the need for DA - How do you add a | <ul style="list-style-type: none"> - Re-evaluate boundaries. - What are definitions for creating a DA? - Adopt DEQ protocols for open burning - Look at ODOT & local jurisdiction for roadway safety & forecasting to account for road hazards. | <ul style="list-style-type: none"> - rule - rule - rule - directive - rule | <ul style="list-style-type: none"> - topographic research to define the zone (Barrier cost/personnel) - population changes (Barrier cost/personnel) - Ability to manage smoke (Barrier) - Rules that aren't integrated between agency or geographic boundary (Klamath/Jackson boundary) – barrier | <ul style="list-style-type: none"> - burn bosses & others, that are familiar with & knowledgeable of SMP - minimize intrusions - No traffic accidents due to smoke |

| | Is there a problem? | Will there be a problem in the future? | What are the options to deal with it? | Will it require changes in rules, statute or directive? | What are the barriers and opportunities? | How will measure success in the future? |
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| F. Are designated areas and smoke sensitive areas adequately defined? (cont.) | - Will different approach be needed for each | DA? Lack of clarity. | - Develop clear criteria of DA and better maps – refer to the SPZ pages as example | | <ul style="list-style-type: none"> - Opportunity – increased coordination - Opportunity – education - Better Maps/boundaries opportunity - Increased costs for burning adj to roads | |

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| <p>F. Continued on 2/18/04</p> <p>Are Regional Areas (neighboring states adequately defined?)</p> | <ul style="list-style-type: none"> • No. • The plan is silent with regards o coordination with other states except WA • Possibly for visibility, we have coordination with WA, ID, NV and CA for Class 1 Areas. • Yes, with respect to the Columbia River Scenic Area, the SMP is silent on this. | <ul style="list-style-type: none"> • An emerging interstate issue because smoke travels both ways between OR and CA, , OR and WA, and OR and ID • Next RHR in 2008 will require a strategy to protect visibility in neighboring Class 1 Areas. • Yes, the bi-state commission adopted a “no degradation “ standard. • If there are significant increases in prescribed burning, the potential for problems may increase. | <ul style="list-style-type: none"> • Set up through WRAP for interstate transport and tracking of smoke. SMP would adopt WRAP protocols and beyond for populated areas. • Periodic meetings between state SMP representatives to discuss issues and concerns. • May require special designation i.e. “other sensitive area” | <ul style="list-style-type: none"> • Rule – “policy section” that we adopt the WRAP protocols. Part IV of Rules w/regards to “administration” and Part III, “Control” <ul style="list-style-type: none"> - Directive – at a minimum it will be referenced ie in the policy & scope sections of the directive. - MOA – possibly between the states & key federal agencies and bi-state commissions. • Directive • Rule | <ul style="list-style-type: none"> • Opportunity – Taking advantage of tools that have already been developed by WRAP • Opportunity – consistency • Barrier – involve more time & prioritization • Barrier – Prohibitions on out-of-state travel • Barrier – Do other states want to play the game • Opp – continuity & Consistency • Opp – Supports the mgt plan • Bar – Plitical football – real seperation between county politics and state-level politics. • Bar – Real or perceived thoughts on addittnl burning. restrictions | <ul style="list-style-type: none"> • Interstate smoke emissions & impacts are managed to the benefit fewer interstate impacts & complaints) of all states (visibly, health, mgt objectives) • Participants perceive meetings as valuable in the endeavor to manage smoke emissions and impacts. • Non-degradation of air quality |
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| <p>G. How may Admin. Rules be changed?</p> | | | | | | |
| <p>H. What feasible alternatives to burning...</p> | <ul style="list-style-type: none"> No | <p>Yes</p> <ol style="list-style-type: none"> No Trade-off analysis Based on the 2003 SIP Increased quantity of fuel to be treated Population increases /changing demographics Lack of Public Knowledge/ Understanding People don't know the rules | <ul style="list-style-type: none"> New position at ODF → alternative fuels utilization person Incentives (i.e. Tax credits) to assist landowners for improved utilization Process to provide information on alternatives WRAP document → alternatives to burning wildlands Analysis and decision process /protocol for selecting alternatives specific to site in or adjacent to DA Grant Program to Jumpstart the alternatives Target WUI for alternatives depending on risk. Track alternatives to burning (acres) | <ul style="list-style-type: none"> Legislative authority Statutory None None Rule/Directive Fed \$ -No Policy – directive Mandatory – statute/rule Directive (Data collection system) | <ul style="list-style-type: none"> Not all alternatives are feasible – economically, ecologically, and operationally. – Barrier Lack of understanding of the process of how alternatives work – barrier Bio-Mass utilization – opportunity Lack of the WRAP document – barrier Resistance to change – barrier Create jobs – opportunity No funding – barrier Different Jurisdictions - barrier Utilization – opportunity Divide the state into climate/weather/ burnday and social areas - opp No weight & assist. Given to alts – barrier Unreliable \$– barrier Change in direction for grant awards –opp Funding –Barrier Defining Treatment alts in WUI area – barrier Project emissions foregone | <ul style="list-style-type: none"> All user objectives are met. Increased use of appropriate alternatives to burning. Public Nuisance and complaints decrease Demonstrate increased use of appropriate alternative increases acres burned where burning is the only alternative. All geographic areas submit planned activities by January 1 |

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| H. (Cont.) | | | | | <ul style="list-style-type: none"> • New Position: barriers: funding & public perception of govt growth. Opportunities: 1.split position w/ ODA/ODF/DEQ 2. active outreach and education. | <ul style="list-style-type: none"> • Position Funded |
| I. Economics/funding | | | | | | |
| J. Communications/ Education | <ul style="list-style-type: none"> • Yes. The public doesn't know there is a SMP. Burnbosses. Why is burning done? • Levels of impact need to be communicated. | <p>Yes. Based on</p> <ul style="list-style-type: none"> • Potential increased burning and growing population. • Changing demographics & urban forests | <ul style="list-style-type: none"> • Targeted messages to specific groups • Smoke Education Tool Kit • Job aids/Tools for practitioners • Communication to local stakeholders • Information pkg to complainers • PAC NW coordinated outreach • ODF position dedicated to SM utilization and markets (ie. Paul Bell's position) • Training program for burners (mandatory) (Certified burn manager.) • Include a 1-page description of SMP when the notice of operation is issued. • Issue a 1 paragraph news release that burning is being done under SMP requirements • An integrated website that describes the use and regs for use of fire | <p>Directive</p> <p>Directive</p> <p>Directive</p> <p>Directive</p> <p>Directive</p> <p>Directive</p> <p>Directive</p> <p>Rule</p> <p>Directive</p> <p>Directive</p> <p>Directive</p> | <ul style="list-style-type: none"> • Money – barrier • Education is a long term commitment – barrier • Multiple approaches needed based on message and target audience • Leg approval for position – barrier • Agreeing on the message – barrier • Local media – opportunity • Use the Weather Channel/NOAA for \$ for education/notification – opportunity • Opportunity – fits w/FPFO and public education (partners-KOG) • Opportunity – insert SM questions in OFRI public opinion survey • Develop a complaint tracking system | <ul style="list-style-type: none"> • Public knowledge and acceptance of SMP • Budget from the legislature is adequate and consistent • Implementation of training and CBM programs • Reduced complaints |

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| <p>K. AQ Objectives (Not "A" in Matrix) 1) Intrusion</p> | <ul style="list-style-type: none"> Intrusions have declined over time – see annual report | <p>No – if SMP works - <i>Need for separation of objectives and authority for DEQ/Smoke Mgt</i> - Includes Non-Class 1 Visibility</p> | <ul style="list-style-type: none"> Convert B-scat data to use ug/m3 for forest and range fuels Better tracking & communication between agencies Quality assurance system – “feedback loop” – where do we need to clamp down? What is the source? How is the burning being done? | <ul style="list-style-type: none"> Rule change | <ul style="list-style-type: none"> Available Data (barrier) Process to look at exceptions and find solutions (opportunity) Develop a web-based response system for smoke complaints/concerns for the public- applies to intrusions, visibility & nuisances. | <ul style="list-style-type: none"> Quantitative measure of what an intrusion is. No or minimal intrusions |
| <p>2.) Visibility</p> | <ul style="list-style-type: none"> DEQ Data did not show conclusive trends. | <ul style="list-style-type: none"> Unknown for VPP and Regional Haze | <ul style="list-style-type: none"> Monitor the effects of burning in Class 1 areas Regional Haze SIP designed to reduce likelihood of an impact. | <ul style="list-style-type: none"> None Rule | <ul style="list-style-type: none"> Year-round SMP-bar. Funding for monitoring – barrier Whether monitoring network is expanded – barrier Expand SMP to Central and E. OR.- barrier | <ul style="list-style-type: none"> Continued trend (no worsening) of Class 1 Visibility trends No loss in visibility days. All objectives being met. |
| <p>3.) Nuisance / complaints</p> | <ul style="list-style-type: none"> Inconclusive - Complaints aren't tracked | <p>Yes</p> | <ul style="list-style-type: none"> Track them and better communication between agencies Feedback loop to matrix item F – consider changes in DA boundary Increase monitoring Do we want to have a complaint tracking system for each burn? | <ul style="list-style-type: none"> Rule Change Directive None – see F | <ul style="list-style-type: none"> Funding to track them - barrier New Work for agencies – barrier Recognize when we are getting complaints in geographic areas. | <ul style="list-style-type: none"> Better trend data to base future decisions Fewer complaints DA changed as appropriate |

