

Smoke Management Review Committee Meeting
Oregon Department of Forestry
Operations Conference Room, Salem
March 20, 2003
0930-1530

In attendance: Gary Stevens, Jim Brown, Stan Benson, Gregory McClarren, Chris Jarma (proxy for Mike Dykzeul), Sue Stewart (proxy for Erik Christiansen), Brian Jennison, Jim Russell, Lee Miller, Larry Calkins, David Collier, Mike White, Mike Ziolko and Cindy Smith (notetaker).

Visitors: Kim Metzler, LRAPA, Brian Finneran (DEQ), Nick Yonker and Jim Trost.

Mike Ziolko was acting chairman in Stephen Fitzgerald's absence.

1. Administrivia

Mike Ziolko, ODF

Smoke Management Review Committee information is now available on the web. The address is in the minutes. New E mail address for Greg McClarren is attable@oregontrail.net

2. Minutes

The minutes were approved as written.

3. Forestry Program for Oregon

Mike Ziolko presented a draft letter to the Board of Forestry prepared by Mike Dykzeul regarding the Forestry Program for Oregon for consideration by the committee. The committee discussed the March 5 Draft FPFO.

Discussion:

- Jim Russell said the USFS and BLM have chosen to abstain from comment since the regional office and state office have already commented. The committee can send a letter but should acknowledge this fact.
- Greg McClarren stated that soil and water are basic resources and air is equally a basic resource. Clean air is essential for a sustainably functioning forest ecosystem that's productive. That notion as well as the effects of activities both on forest and off forest on the forest is important and it's missing. We have a Clean Air Act and a Clean Water Act and there is insufficient recognition of that in the document. Members were referred to Page 9 bullet #3 and Mike Dykzeul's second paragraph.
- Jim Brown said he could see where they were coming from in not mentioning air. Water and soil, etc. are pretty specific to the forest itself. The function of smoke management is more to avoid problems of pollution which really don't impact the forest as much as they impact everything else. It doesn't seem to fit – seems like it's talking more about forest practices.
- Brian Jennison reminded committee members of the mission statement of the BOF - "to lead Oregon in implementing policies and programs that promote environmentally and socially sustainable management of Oregon's 28 million acres of public and private forests..." and added that he thought the mission was broad enough to include at least a reference to air quality somewhere.
- Jim Brown said he agreed.
- Brian said he liked what Mike D has done in his draft letter and added that it is a good capsulization of what everyone has said and a good general concept.
- Mike Ziolko said he thought Stephen would like the committee to develop some specific wording to send to the board addressing air quality impacts or air quality and prescribed burning and added that the committee needed to be prepared to finalize this letter at the next meeting.
- Jim Russell commented that he was looking for something more quantifiable... it does not discuss how successful the Smoke Management Plan has been in terms of intrusions etc. nor does it address the fact that the Smoke Management Plan is the primary mitigation for prescribed burning in the state of Oregon nor does it discuss the matter of continued funding. He suggested that somehow they needed to incorporate the relative importance of the Smoke Management Plan not as something to be considered funding for budgetary issues but as direct mitigation on clean air in the state of Oregon.
- Jim Brown voiced his opinion that it certainly has been successful.
- Stan Benson commented that specific incidents don't mean it's a bad policy.
- Jim Russell noted that there is no direct goal identified to protect air quality within the state.
- Chris Jarma said he thought the Department would not have any difficulty adding it as a goal and pointed out that they have been very responsive to date about changes people have requested and it has become a better document through the process.

- Stan said it seems the goal is DEQ's while we determine how to stay in compliance...by providing the tools and regulating.
- Greg stated that clean air is a tool, a critical element of for productive forest ecosystems. It should not be put in a secondary or tertiary position. State forestry and DEQ have worked very closely together to aggressively manage the Smoke Management Plan and that should be recognized.
- Sue referred committee members to page 10 – Strategy F and suggested inserting “air quality” line 7 – and delete the word natural from line 8... discussion followed.
- Brian said he would be satisfied if you add the words air quality whether you leave natural in or out.
- Jim R added that nationally too much time is spent debating the word natural...
- It was suggested that if the word “natural” is left in, a definition should be provided.
- Greg McClarren suggested asking the question of what they meant by natural disturbance and active management...
 - Sue Stewart said this is a semantics question and has nothing to do with the air quality question
 - Better words for clarity could be found.
 - Brian Finneran suggested that a definition of natural may be found on pg 60 line 29
 - Greg McClarren said the two strategies seem to be redundant and it's more about finding the balance between natural disturbance and active management...
- Greg proposed that the committee bite the bullet and not say anything except about the two bullets on page 10 and 11.
- Brian Finneran said he would agree.
- Sue asked if it would be appropriate to suggest that the section on **page 64** titled Air Pollution be changed to Air Quality or Air Quality paragraph be added to address four points:
 1. Affects of all forest emissions on forest production.
 2. Regional Haze.
 3. smoke Mgt Plan.
 4. Class I Visibility areas in the state
- Gary asked who would write that paragraph and Mike Ziolkko replied that he and Steven would work on it and have it ready for the committees approval at the next meeting.
- Mike Z pointed out page 65 and asked if they wanted to address wildfire.
 - Brian said it appeared a little one sided as written.
 - Mike Z suggested that it could be a place to say that smoke mgt has been successful and Greg agreed.
- Gary Stevens - Oregon' s SM program has successfully addressed some of these concerns
- Mike Z added that there will be a facilitated discussion at the April meeting.
- Greg suggested that the committee should give staff the concepts and let them go from there.

Following considerable discussion, committee members agreed to:

- Add a third bullet on page 9 regarding clean air and water
- On page 10 add air quality component to strategy F
- On page 64 talk about air quality, outside sources affecting the forest, successes of the Smoke Management Plan, and discussing haze and visibility issues as a separate issue.
- ODF staff will be asked to address the smoke management issues in the plan and leave it up to the next version of the FPFO to have a proper wording.

With minor wordsmithing, committee members were in agreement that they liked Mike Dykzeul's draft letter. Committee members were asked to send any additional comments to Mike Ziolkko or Cindy Smith for possible inclusion in the revised letter. Mike Ziolkko will work with Stephen to draft a letter for the committee's approval.

4. Break

5. Public Comments

Mike White, CFPA, coordinates most of the burning in his area. He suggests there needs to be closer interaction between ODF and the other agencies. He is very involved with the DEQ office in Coos Bay. He has met with them and explained the smoke program and if they have questions, DEQ calls him. Even to the extent that for DEQ's open burn permits where they write in his instructions that open burning will be on a good burn day, then they contact the CFPA office. They get along really well and get a lot accomplished. It's an educational process getting everybody up to the same speed and

understanding. When they first started talking about smoke management or forecasts, DEQ didn't have a clue where to go – over the past three years or so they've made a lot of inroads.

6. DEQ Issues List

Brian Finneran, DEQ

Brian provided members with copies of his Memo “DEQ ideas for Oregon SMP review topics.” The memo presents a list of issues the DEQ wished to have addressed by the committee and is willing to return at a future meeting to further discuss any of the issues.

Explaining that he and Larry often get calls to answer questions for the public he added that he makes it clear to the caller that they need to talk to ODF.

Discussion of Issues/Concerns Presented in the DEQ Memo:

- Brian F. repeated his concern over the shift to understory burning and said about five years ago he had his eyes opened at a relatively large demonstration burn on the Heppner Ranger District where, initially, there was a lot of understory smoke – eventually it all came together and made a huge mass of ground smoke - had there been a larger population in the area there would have been a lot of complaints. As a result he does not see understory burning as a useful tool to minimize smoke and said the committee needs to determine what changes need to be made to the smoke management program if this type of burning is to continue to increase in the future.
 - Jim Brown asked if his expectation was to get a column of smoke? Brian replied “No” and Mike Ziolk added that this type of burning should result in a mosaic pattern with some areas burned and some not. This type of burn should produce low intensity flames and is not expected to generate a column.
 - Jim Russell added that a concentration of smoke on site is a good thing in this type of burning – you don’t want it to escape and get into populated areas.
 - Mike Ziolk reminded committee members that this is an issue previously identified to be addressed by this committee.
- Brian F. pointed out that there appears to be a dichotomy when the best conditions for smoke dispersion may be on a breezy day but creates difficulty for the burner who may have difficulty controlling the fire under the same conditions.
- Brian asked if there are times when the burn unit chief will make a decision to get more burning done a particular day just because the risk of fire spread is very low and maybe exceeding what the daily burn announcement was. There are two concerns – air quality on one side and fire safety on the other. How does that impact meeting the target?
- Jim Russell commented that less than one half of one percent of fires escape.
- Larry mentioned that this concern comes out of an incident in Eastern Oregon – some burning in the Wallowa Whitman area - Starkey – when the forecast was "not a good day to burn". Somebody from Eastern Oregon said they had to meet their target and convinced Smoke Management that they could give it a try. They did - and smoked out La Grande. That was the incident that we got lots of complaints on.
- There was another one – Crown Pacific in the Bend area where a similar type of thing happened. They were burning piles and the smoke rolled into Bend. The question is – forecasts are great – was it communicated and translated properly to the person in the field?
 - Regarding the situation in LaGrande, Mike Ziolk stated that if the land manager had talked to the forecaster and they said it was OK to burn, then that's within the requirements and if it went bad somehow and an adverse smoke impact occurred then it's either a bad forecast, bad instructions or something went wrong with the burn. If approval was granted for the burn, that's within the parameters and the question is does the committee want to change the parameters.
 - Regarding the Crown Pacific land, Mike said it is not under the mandatory program for Smoke Management and further explained that what ODF issues for them is basically an advisory and it's up to them to decide to follow it. Again the committee can decide if something needs to be changed.
 - Larry reiterated that he thinks the concern is the advisory nature of it. “The advisory was out there and it seems like decisions were made based on fire safety. Let's do more and more burning today – it's only an advisory, it's a good day to burn. Let's just get it done. There were impacts, there were complaints

there was air stagnation. It was really clear what the advisory was if you looked at the forestry website. In both those cases it was not a good day to burn. “

- Jim Russell remarked that it was not a good day from a smoke management standpoint.
- Brian said it really pointed out to DEQ that there are two perspectives out there. He added that both valid perspectives but does the smoke management program adequately address both those issues.
- Sue Stewart – Is the question you would like us to explore " Should all burners on all lands in Oregon be covered under a mandatory program" and the other question would be, "from the perspective of the DEQ is the goal to never have another complaining phone call?"
 - Brian responded, “No, of course not. We fully understand the objective is to minimize smoke impacts. Smoke impacts will happen.”
 - Greg said that if the agencies weren't serious about it, they wouldn't put 20 air quality monitors out there.
 - Brian and Larry also questioned how we know that the Smoke Management Plan is being complied with. Mike Z. responded that audits are one mechanism but otherwise we assume compliance.
 - Lee Miller reminded committee members that, as burners – generally if they have an intrusion, they are cut off.
- DEQ receives calls from the public expressing concern over the use of plastic to keep piles dry – the primary objective is to get clean combustion – dry materials burn better – but then there are toxic components of smoke issue.
 - There are materials that are designed to keep piles dry that are not plastic.
 - Kim Metzler said she receives the same complaints in Lane county and would like to see a move towards using the non-plastic materials to keep piles dry.
- Addressing the issue of non-burning alternatives, Brian Finneran said there is a document he worked on for the regional haze rule and he would like input from this committee on the document. It includes a comprehensive list of every type of non burning alternative that has been used in the field ... The Draft document can be found on the web at www.wrapair.org. The committee will discuss this as an agenda item at future meetings.
- Issue 6
 - Jim Russell asked if DEQ is prepared to talk about the PM 2.5 strategy – does DEQ agree with designated areas?

In addition to issues, DEQ's memo also raised numerous discussion topics and exploratory topics. Refer to handout.

Discussion of “Discussion Topics”

- Referring to Discussion Topic 4. Brian Finneran brought up the question of how intrusions are documented when there is no monitoring equipment. He views it as a question of clarification for DEQ.
- Brian said Discussion Topic 6 is an issue of public notification
- Referencing Discussion Topic 7, Brian asked about multi-day burning and asked how it is this addressed.

Discussion of “Exploratory Topics”

- Exploratory Topic 3. Greg M said he would like to see the approach be burn only on best days and burn all you can.
 - Jim Russell added that the level of sophistication is increasing dramatically regarding the need for good weather support.
 - Brian Finneran agreed adding that it increased especially as technology changed.
- Exploratory Topic 4. Brian Finneran said he suspects this is already being done.
 - Greg would like to see the focus be on the end result – no intrusions, no violation...
- Exploratory Topic 5. Jim Russell noted that there is currently a detailed smoke management plan prepared by the burner called the Burn Plan but added that is not like California.
- Exploratory Topic 6. Prescribed burning has competition in the fall and winter ..
- Exploratory Topic 7. Mike Ziolk noted that this is a concept the committee may want to consider and suggested a review of the SPZ's that are in place right now - are they still needed and/or effective.
- In response to a question about Exploratory Topic 9, Mike Ziolk noted that this is the “how and when” right now to update the NE Oregon Smoke Management agreement/MOU.

- Exploratory Topic 10. Mike Ziolko responded that despite efforts to involve the tribes, ODF has not been able to get them to participate much in this process. He further explained that the Warm Springs area is the only area that does much burning and added that the Grande Rhonde does participate in our program but they do limited burning. Mike Z. will continue to try and involve BIA.
 - Jim Russell suggested that it would happen as a result of their having to implement the regional haze rules ...
- Exploratory Topic 11. Sue Stewart commented that unburned piles are still a source of fuels and not burning the piles does not eliminate hazardous fuels concerns. Sue noted that some piles are left as “critter” piles.

7. Working Lunch

Continuation of DEQ Presentation

Jim Russell suggested Brian compare his list to our list of 42 issues and determine where each issue best fits. Brian agreed to do so as well as to prioritize his list. Brian will come prepared with that information for the next meeting.

8. Discussion of Previous Meetings' Issues

Mike Z passed out copies of the responses he had received from Geoff Babb and Stephen Fitzgerald to the issues questions. They were presented in a matrix format.

Brian Jennison added that he had done his in a similar fashion.

The Committee agreed that the matrix was a good way to summarize/present the data

Jim Russell said that we will have a lot of data and questioned if we need to prioritize the issues.

Greg said we need to have a conversation around the topics before they are prioritized and requested a broad general discussion first.

Sue Stewart pointed out that there is a lot of overlap and suggested that may help streamline the process.

Mike Ziolko noted that after once looking at A-J separately, things might fall out and/or change priority.

Taking Greg's suggestion and looking at the generally category first, discussion included:

A.) Are Air Quality standards being met?

- Jim Russell asked what standards ... NAAQS, visibility or nuisance?
 - Significant discussion resulted in the addition of a new question shown in the attached matrix as “K”.
- Jim Brown said there needs to be built into the system ways to give the system flexibility as standards may change in the future...
 - Greg agreed and said they have improved over time but there are nuisance problems – but that is not a standard.
- Is there a problem? No. Annual and 24-hour particulate standards are met.
 - Brian F added that Idaho came up with a one-hour standard to address the nuisance issue.
- Sue Stewart asked if we are considering a change in the standards, how far below the standard are we? She would like to see trends identified.
- Jim Russell said he has having a difficult time not including visibility. A SIP is due on Dec 31.
- Greg sees visibility and nuisance as something to be incorporated in the future.
- How to evaluate success - Would like to see 3 divisions – Air quality standards - NAAQS, Air Quality objectives for Nuisance, and Visibility objectives being to minimize complaints and maximize compliance.
- Jim Russell said he would like to see a discussion of nuisance in the smoke management plan as it would help clarify things. Discussion of nuisance vs NAAQS violation.
 - Brian Finneran said it can be done with a one-hour standard.
- Mike Ziolko asked if the number of intrusions is a problem? The trend is down.

9. Break

10. Public Comments

There was no public comment at this time.

11. Discussion of Previous Meetings' Issues (continued)

B.) Are Burning Objectives Being Met?

- Lee Miller replied in the negative because the landowner has to look at costs.
- Jim Brown said not always because it's a major cost when lose a burn day.
- Sue Stewart added that it does encourage people to seek alternative methods therefore fuel treatment needs may be met.
- Lee Miller responded by asking if we were replacing burning with plastics.
- Jim Russell then asked if ecological objectives are being met.

C.) What changes may be needed for projected increases in forest health burning?

- Mike Ziolkko reminded committee members that forest health burning is exempt from fees.
- Sue Stewart said the committee needs to address how we meet the needs of different kinds of burning. (i.e. underburning)
- Sue Stewart suggested rephrasing as "Evaluate the SMP as it addresses forest health burning."

D.)

- Jim Trost commented that this is a non-issue because no one is dumb enough to burn when there are wildfires and probably already have their resources committed to those fires.
- The issue is more of "do we allow an increase in prescribed burning smoke impacts so that weildfire smoke impacts are less?" If so, how and to what degree.

E.) Evaluate the SMP regarding regional issues.

- Gregg – Oregon is a net exporter – not an importer of either clean or dirty air.
- Jim Russell asked about the Ag scenario and if it fit in here.
- Jim Brown suggested backyard burning fits in here also.
- Jim Russell noted that the Regional Haze Rule will require protection of Class 1 areas outside the state.

F.)

- Jim questioned whether the definition of designated area is adequate and asked where the definition came from.
 - Mike Ziolkko responded that the designated areas were identified from high population areas and Lincoln City, Bend and Oakridge were added later.
 - Non-attainment areas are different but it doesn't appear to of consequence since the entire state is in attainment status.
 - It was noted that the 8 1/2 x 11 map of designated areas, which is included in the Administrative Rule, may not be sufficient. More definitive boundaries are needed.
 - Greg asked if the terms "designated area", "restricted area", "smoke sensitive area", "protected area" and "special protection zone" should be combined into one.
 - Mike Ziolkko unhesitatingly replied "No." Because they represent different concepts. Some are areas of the sources of smoke and others are areas the Plan tries to protect.
 - Kim Metzler asked if some areas were more protected than others.
 - The answer was "Yes." Based on different needs.
 - Greg said the provisions for revision were not clear.
 - Mike Ziolkko said it is done through rule change.

Discussion ended for the day. The group reached consensus on the topics discussed and will resume discussion at the next meeting. See attached matrix.

12. Future Meeting Schedule

In order to facilitate scheduling of the Operation's Building Conference Room, committee meeting dates were scheduled for the remainder of the year as follows:

- July 17, 2003
- August 21, 2003
- September 18, 2003
- October 16, 2003
- November 20, 2003
- December 18, 2003

13. Adjourn

The Smoke Management Review Committee meeting adjourned as scheduled at 1530.

The next meeting of the Smoke Management Review Committee is scheduled for April 17, 2003

Committee information may be found on the web at:

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