

Smoke Management Review Committee Meeting
Oregon Department of Forestry
Santiam Conference Room, Operations Bldg, Salem
0830-1500 August 26, 2004

Attendance: Mike Ziolko, Jim Brown, Stephen Fitzgerald, Gregory McClarren, Mike Dykzeul, Stan Benson, Gary Stevens, Jim Russell, , Brian Jennison, Brian Finneran, Lee Miller, and Cindy Beck. Guests: Leonard Gondek, Katie Fast, Tim Keith, and Jim Trost

1. Administrivia

Mike Ziolko

Mike Z. handed out maps for designated/restricted areas including Special Protection Zones and Class I areas where visibility could be a protection issue. He couldn't find any maps of non-attainment or attainment areas, so he attached a DEQ table that shows the non-attainment communities, and where there are air quality maintenance area strategy developments in progress.

Discussion:

- Gregory said that this is really key to Question F, and will need a considerable amount of discussion at a later time.
- Mike Z. said that the little circles on the map show the designated areas where hopefully the committee will come up with some kind of recommendation as far as how a designated area should be defined. Whether it's city limits, urban growth boundary, or whatever.
- Jim R. wanted to know that because of regional haze issues, should they not be getting designated or non-attainment areas for the neighboring states.
- Brian F. said that it would help to have a map that shows the neighboring Class I areas in Idaho and Washington.
- Stephen said that in the write-up that Gregory, Gary and Erik are working on, they should include wording about being able to account for smoke coming from other states to Oregon, and being able to track what is Oregon smoke & what's not.
- Brian J. said that conceptually this is a good idea, but realistically, other than Portland, Vancouver and maybe Boise, what are they worried about.

Mike said that the October meeting will still be October 21. Stephen won't be at that meeting. Gregory may not be there either, so someone else may have to facilitate. It will be determined at a later date.

2. Minutes

Corrections:

Page 3: Bullet 3 – “admissions” should be “emissions”.

Page 6: Bullet 2, sub-bullet 2 - “120,000+ acres” add “is for Washington and Oregon - total”.

Page 8: Under Discussions, Bullet 3 should read “questioned” instead of “question”.

Page 9: Circle 3 – Add to the end “If it does not meet the resource objectives, then it will be suppressed.”

Page 9: Circle 4, square 1 – Replace “wildland refuges” with “wildlife refuges (USFWS).”

Page 12: Bullet 6 - Replace “asre” with “are”.

Page 13: Bullet 5 – Replace “rational” with “rationale”.

Minutes were accepted with the noted corrections.

3. **Final Draft Matrix Question C**

Deferred until the next meeting.

4. **First Draft Matrix Question E – Regional Smoke Management**

Brian Finneran, Brian Jennison

Brian F. said that he changed the Charter question to make it a little more direct. It now reads “Evaluate whether changes are needed for the Oregon Smoke Management Program to improve regional air quality and visibility issues”.

Is there a problem?

- Brian F. said that field burning is clearly a summertime activity when there’s very little prescribed fire going on in the state because of fire safety reasons.
- He said that the last paragraph under this question is trying to address the issue about coordination with Tribal lands. Currently there is none. Brian F. said that he has periodically heard from, the Umatilla Smoke Management coordinator that there are some concerns about smoke impacts that come into the Umatilla Reservation. By going to some of the regional haze meetings over the last couple of years, which have very heavy participation from tribes, they have expressed a lot of concerns about being left out of the loop when it comes to smoke management and not knowing what’s going on around them. That’s why Brian F. has put it here as a problem. Some of the tribes are very involved in regional haze and smoke management and protecting air quality. Other ones simply don’t have the staff to do anything, so they are more in a reactive situation. Maybe once or twice a year there’s a significant smoke impact that comes into the reservation area and they’re wondering what’s going on. They do their own burning and sometimes quite a bit of that and they’re not aware of their responsibility.
- Jim R. said that maybe the sentence needs to be rephrased that we would like more coordination and involvement with affected tribes regionally, not necessarily just within Oregon.
- Gregory said that this is particularly pertinent about what Jim R. says. There’s an adjacent federal lands tribal relationship that’s unfolding out there. Also, Gregory said that in the second paragraph, “...rangeland burning in Central Oregon.”, he wouldn’t make that exclusive to Central Oregon, i.e. delete “Central”. The next sentence “It does not address agricultural burning **and rangeland burning** outside the state. Agriculture burning does not equate to rangeland burning. They’re two different issues.
- Jim R. said not to isolate issues based on grass seed or type of burning. There is other seasonal burning that takes place that is also fundamentally agriculture. He thinks the group would be better served, based on this forum, talking about agriculture in general as opposed to specific crop type or location.

- Brian J. indicated that field burning is just different from agricultural burning.
- Brian F. said that he thought it would be helpful on terms of describing the problem to give examples. But he was also trying to focus on where there's concentrated, heavy burning.
- Gregory said that the biggest problem that the Jefferson County seed growers have is that the management of other burning is unregulated, other agricultural burning occurs.
- Stephen said that when you start referring to ditch burning and localized burning you are getting away from the regional haze issue.
- Mike D. said that in the second paragraph on the statement about the differences between the agricultural and the traditional, is that it's taking place during a different time of year, so that we should as is seasonality issues. He doesn't know if it is trying to separate, not a good or bad, but burning during different times of the year. He could see that if we were still talking exclusively about visibility protection period, in summer months where no prescribed burning is taking place. He said that if we're talking about building forests, regional haze issues and all the other burning that is going year round, it makes it a little cloudier in his mind. We're saying seasonality-wise, there are two different periods of time with two different users.
- Brian F. said that maybe one reason there isn't regional coordination is that there simply isn't much going on in the Oregon Smoke Management program during the summer time, so maybe there isn't that much of a need to coordinate with Willamette Valley field burning folks. In July, August and September is there really any prescribed fire activity going on? That's when the field burning program is operating.
- Mike Z. said that you'd have Class II or Class III burning going on in Douglas county, Coos county, and maybe Curry county.
- Gregory said that in the last six or seven years the biggest impact of regional haze plans have occurred during the burning period when there was long-range transport of dust.
- Jim R. said that at some point in time regional sources are going to contribute to annual exceedence. He said that when we can talk regional haze, we can talk protection and air quality. But we're going to have to deal with it regionally as an entire group of sources and track burning so we don't end up with exceedences that are going to restrict burning on an annual basis as a result of sources outside our geographic area. Somehow we have to integrate all the programs.
- Brian F. said that he wanted to go back to the point that was raised about the tribes and coordination with EPA. He said that he's not quite clear on what was being pointed out and if that really belongs in the problem statement or more as a solution.
- Jim R. said that he'd add it more as an introduction looking at all sources including adding tribal sources. The vehicle to do that is to coordinate with EPA in the Oregon Smoke Management plan.
- Brian F said that pointing out that EPA assistance in this should probably come more under Options at this point.
- Mike Z. wanted to clarify that right now the tribes, through BIA, are included as a cooperating agency in the Smoke Management Plan. We don't collect data from them, but they're supposed to be checking with Smoke Management before they do their burning.
- Brian F. said that he will revise the last paragraph to say something to the effect of "the plan needs some evaluation of in terms of coordinating with tribes." It's not just protecting tribal

lands from prescribed fire when smoke comes onto Tribal Land, it's also what they're burning - smoke goes out as well.

- Jim R. said that there is another point to this that needs to be addressed. That is are we going to recognize the Class I status that some of the tribes have classified some of their areas. Spokane is considered Class I.

Will there be a problem in the future?

In reference to the first paragraph, first and sixth sentences, it was suggested to strike the word "major." Brian F. said that he would then like to add the qualifier "ag burning that can affect visibility."

- Brian J. said that even if Oregon's Smoke Management Plan doesn't want to deal with agricultural burning, the federal regional haze rules are going to require Oregon to deal with agricultural burning sooner or later.
- Brian F. said that they're going to need to show that the current areas where there is concentrated agricultural burning are currently meeting enhanced smoke management program criteria. The best smoke management plan is in place from a regional haze perspective and the emissions are being tracked.

In reference to the second paragraph, Brian F. defined the Gorge as a region, like any area of the state, as currently being protected under the Smoke Management Program. The effort that is going to be happening in the upcoming years may want to increase the level of smoke protection for the Gorge to protect visibility – give it some special designation for visibility status -almost like a designated area.

- Jim R. says that you need to protect the Gorge, but at the same time, you want to make sure it doesn't end up a designated area that's going to affect burning surrounding the entire Gorge.
- Brian J. said that the current management plan is non-degradation. That does then describe what type of option you need for the future.
- It was suggested to change "increased" to "enhanced" in the last sentence.
- Mike Z. indicated that Washington has basically dropped their visibility program, so they may not be part of the discussion as indicated.
- Brian F. said that the visibility protection plan will be adopted by The Gorge Commission. It will be their visibility plan. It will include coordinating with Washington Department of Natural Resources smoke management staff on what they can do to avoid smoke impacts in the Gorge to protect visibility. Even if Washington still had their visibility program, Brian doesn't think this will fall under that. It would fall more under the State's smoke management program.
- Stephen suggested adding a sentence or two under "Is there a problem?" regarding the Washington issue on the absence of their visibility program.

What are the options to deal with potential future problems?

Brian F. said that this discussion focuses on relying on interagency agreements or memorandums of understanding between state agencies that are conducting smoke management programs.

- Jim R. raised the questions on what is going to be a smoke management problem and what's going to be a SIP problem under the regional haze. Who would negotiate those MOUs? Would Brian F. be negotiating them for DEQ, or would Brian's expectation be of the smoke management program and the support in negotiating those agreements. Jim R. wanted to

know how we're going to align ourselves with where we want to go with this. He thinks that at least a course should be charted on where to go with this. Who's going to have the responsibility?

- Brian F. said that this hasn't been decided yet, but the quick answer would be that these would probably be a joint responsibility between DEQ & ODF. Most of these things would be in the SIP, and they would be working with the other states in the same regard.
- Brian F. indicated that the question is do we revise the smoke management program to reflect this new amount of regional coordination. Does it mention the interagency agreements? Does it go into any detail about how daily smoke management coordination works? Who's going to pay for it?
- Mike Z. believes that it would have to be part of the smoke management plan.
- Brian F. said that sentence would be kind of an example of what would be one of the provisions in an MOU. Daily smoke management coordination of planned burning activity. How it would incur the costs would be additional questions. Projections of interstate smoke transport should be included.
- Gregory thinks that a reference to rangeland should be added in the second paragraph
- Brian F. will add the reference of bringing EPA into the picture in the last paragraph since it's more of a federal land issue.
- Mike D. said that one other point when talking about potential future problems focusing on the coordination part should remain consistence with the other matrix items. Getting back to some of the funding/forecasting tools, some of the ways to get ahead of the game is to include the forecasting capabilities in the coordination. This also makes sense to work on this aspect so the State comes up with the increased funding to increase the forecasting capability for the department. It is a coordination in a lot of these areas, so shouldn't funding also be something to share the burden. What are the options to deal with future problems of better forecasting besides just communication.
 - Brian F. said that one of the options to deal with the future problem is better emissions tracking and monitoring, and forecasting tools, and sharing of information.
 - Brian J. added that Region 10 of the EPA does fund air modeling efforts that include Idaho, Washington and Oregon. And they are continuing that effort.
 - Brian F. will strike the sentence that refers to summer burning activity.

Will these options require changes in statutes, rules or directives?

- Mike Z. said that "or directive" should be deleted since the directive is more policy issues. If the committee recommends a requirement, it would be a rule change.
- Brian F. said that the idea of having regional coordination in all of the Pacific Northwest is a fairly ominous task the way things are currently set up.
- Jim R. thinks that it needs to reflect the uncertainty in terms of what's going to take place.
- Mike Z. said that he thinks maybe the committees recommendation is that a MOU(s) needs to be developed with the other states or areas, and just leave it at that leaving it up to ODF to figure out the details. The uncertainty of other states' participation does need to be put into the document though.
- It was suggested stating in the future problems section that there is uncertainty about how we're going to coordinate MOUs, and who all of the key players will be.

- Brian F. said that the second opportunity that he hasn't mentioned is getting funding from EPA for this. He will add it after the last paragraph.
- There was a recommendation to also mention the Northwest Collaborative Air Priorities Project.

How will success be measured in the future?

- It was suggested to change “less” to “fewer” in the first sentence.
- Add “Maintaining the objectives of the Smoke Management Program.”
- A suggestion was made to say that success is measured because we can track emission sources in the region.

5. Second Draft Matrix Question D – How should wildfire versus prescribed fire impacts be addressed? (See Attachment 1)

Jim Russell

Jim R. said that he was working off the comments from the group a month ago. He took the previous draft and combined each of the sections into a narrative phase.

Is there a problem?

- Jim R. said that he looked at prescribed burning as potentially a mitigation source to reduce the occurrence of wildfires.
- Mike Z. commented that the second sentence should be changed to add “health” after public.
- There was a suggestion that maybe it should say “..... public concerns (i.e. health, nuisance, avoidance, inconvenience, applied natural resource policy issues) and visibility....”
- Jim R. said that he will find and add the reference for the second paragraph.
 - Mike Z. said that the reference is Appendix 5 in the directive.

Will there be a problem in the future?

- Jim R. indicated that what he wanted to say in the first paragraph was that in northwest Oregon we have a high hazard fuels but a low ignition risk. So he wanted to target those areas where there was a combination of two: high hazard and ignition.
 - Mike D. suggested that it may be worthwhile to state that on the coast and the west side of the crest of the Cascades there is the same kind of fuel load plus more risk from emissions.
 - There was agreement on this point.
- Jim B. wondered if it was really not fair to say that the public doesn't understand it.
 - In the second paragraph, first sentence, it was suggested to change it to “The public may not universally understand the logic....”
 - In the second paragraph, second sentence, it was suggested changing it to “Increased public acceptance of.....”.
- Mike Z. suggested in the last sentence to say something like “.....acres burned and fuel consumed over time....” He also suggested that maybe what's missing is how should wildfire versus prescribed fire impacts be addressed.
- Jim R. said that the whole objective here is to increase burning, but what happens if we lose that capability.

- Stan indicated that the statements being discussed are “What are barriers & what are problems?” In the question regarding will people accept the burning, that’s a barrier and also a problem. Is this section crossing over?
- It was stated that demographic changes should be considered a potential problem for the future.
- Gary said that the second sentence that starts with “Increased public acceptance...” needs to be moved to the opportunities and barriers section, and in success as well. In the third sentence starting with “Tracking of the change....” it is probably “benchmarks of success” and “options for the future”.

What are the options to deal with the current problems?

- Brian J. said that in the second paragraph, first sentence, fourth line, he would like to strike “development and establishment” and say “designation of”.
- Gregory suggested in the second paragraph, second line, to make it “of reporting and tracking” instead of “to track and report”.
- Gregory said that is similar to what he, Gary and Erik are suggesting with respect to receptor areas.
- It was noted that it is important to stay focused on geographic specific areas.

Will these options require changes in statutes, rules, or directives?

- Mike Z. said that there is a need to make sure the fire reporting system includes the data that is needed for tracking. He said that it is considered a procedure.

What are the barriers and opportunities?

- In regards to the fourth paragraph, Gregory said he has a hard time recommending buying into a very labor-intensive model. It may not be a wise use of funds. If the objective that could be achieved by that model or protocol is valid, maybe there’s a better way to do it. Having the public understand and be aware of the activities would be a worthwhile objective.
- Jim R. said that the cost associated with this could be borne by the land manager.
- Brian J. suggested striking “very labor-intensive”.
- Gregory suggested changing the first line, third paragraph to say “An opportunity exists to use various model programs such as the Fire.....”
- Mike Z. said that if increased impacts of prescribed burning occur, then the public may be less willing to accept prescribed burning as a vital option to offset wildfire.

How will success be measured in the future?

- Delete “A” at the beginning of the first sentence.
- Delete “(blacken acres)”.
- Second paragraph, sixth line, delete “and” before “while protecting life...”.
- Third line, second sentence, strike “better,”.
- Second paragraph, fifth line, put a period after “emission reduction” and delete the rest of the sentence.
- It was noted that the cost for smoke management would be less and run more effectively. Jim R. will work on the third paragraph regarding this.

- It was suggested in the last paragraph regarding “less competition” that maybe better allocation of existing burn days, or equity issues among landowners and agencies getting better resolved, should be looked at and noted here.

6. Subgroup Work for Other Assigned Matrix Questions

Tabled for later discussion.

7. Rangeland and Private Land Burning

Katie Fast from The Oregon Farm Bureau was invited to talk with the committee about range burnings. Micah Wells from The Cattleman’s Association was also invited, but was unable to attend. Members were asked to give a brief discussion regarding the Smoke Management Program to guests attending this session.

- Mike Z. gave a brief description of the committee’s purpose. He reported how they were discussing tracking the emissions from all of the different fire sources. One of the big issues is how much rangeland burning is occurring in the state, where is it occurring, when is it occurring, how to get a better handle on the tracking of such burning, and how could it potentially be incorporated into a smoke management program.
- Brian F. reported on the Regional Haze Rule (RHR). The majority of it is focused on the need to have the best smoke management plans in place. States like Oregon are required to revise their State Implementation Plan (SIP) to submit to the EPA that includes these different elements that are included in the RHR.
- Jim R. said that because of the Oregon Smoke Management Plan basically being more intensive in western Oregon and Deschutes county, there are some voids in the rest of the side where most of the burning is taking place. There are basically no controls over BLM-east side of the Cascades. It is mainly voluntary. Federal Land Managers see this as an opportunity to treat everybody equitably in a future smoke management program.

Guest speaker Katie Fast from Oregon Farm Bureau gave an overview of range and burning. She indicated that burning is a management tool. It’s not perfect for all situations. It is a preferred management tool in the sagebrush, perennial grass mixes. There are probably two main types of fuel found in Oregon. One is a mountain sagebrush that’s going to get a little more moisture. The other is a Wyoming sagebrush which is a drier climate plant. Fire is also used to control the spread of Juniper trees. A fire would be desirable with the smaller Junipers under six feet. When they get taller than that, the fire will get too hot and will damage the soil beneath and the desirable grasses won’t come back as landowners would like. The main tool is going to be to try to bring down the cover that they’re getting from sagebrush, or from Junipers, and try to get the perennial grasses back. Late summer is usually the primetime to use fire. Some of the land management agencies may use fire a little earlier due to fire risk and staffing. Large Juniper trees are a huge concern for eastern Oregon and it’s impact on watersheds. The goals are to control the young Juniper and bring back as much of the grass as they can. For timing, this is a tool that sagebrush is used in the mountain sagebrush area in a 10, 15 or 20-year time period. On Wyoming, the drier lower elevation areas, a 50+ year return interval is recommended for a management burn. There are benefits also for the wildlife, and to enhance the perennials. For a

technical resource, Rick Miller at OSU, is known as the expert in the Rangeland Resources Department on range fire and it's tool on management. Katie doesn't think there's a lot of information on how many acres are burned each year. That may be something to coordinate with Oregon State. For coordination or education outreach, The Farm Bureau has county associations throughout Oregon. The Cattlemen do, as well.

Discussion:

- Gregory asked the size of the landowners doing burning.
 - Katie said it varies but she thinks it's going to be more of the larger landowners, because they are going to be the ones trying to get the best benefit they can off the land. In eastern Oregon they are seeing a lot more of the smaller landowners where there isn't as much land management as the people who are making a living off the land.
- Gary asked about the administering process. He asked if they go through a formal organization or coordinate with anyone.
 - Katie said she didn't think there was a lot. The coordination will be more on talking with their extension agent, or others who may have used it. She's not aware of any permitting requirements, etc.
- Mike D. asked if there are still some liability concerns over the use of fire.
 - Katie said it depends on the person. The longtime ranchers who have been using it awhile will be more comfortable with it. The new landowners will probably be more timid on using it.
- Mike D. wanted to know how she thought the reporting requirement would go over with some of these people.
 - Katie said that it may be hard for some of the people who have been so independent. That's why education will be a big piece on letting them know why they're reporting their burning. If there's a belief that it can be used for reporting and show that it's not an impact on regional haze problems, it's going to help by not having tougher regulations on rangeland burning. They need to be shown why it will be important.
- Brian F. asked if she was talking about just private rangeland burning.
 - Katie said that was her reference, but USFS & BLM also use it. She thinks that they follow the same timeframe. They will look at the landscape and see the need.
 - Brian F. was trying to get an idea of the difference between how much private rangeland burning there is and how much there is on federal lands.
 - Katie said that you need to take into consideration, that eastern Oregon is mainly federal land. On the private lands there is a lot less burning. On a lot of what is private land, there is a lot of timber.
- Brian F. wanted to know if it is just fire applied in general to the area and only small parts are burned.
 - Katie said that the goal is to have it impact the sagebrush or the taller small juniper trees. It's a controlled burn, but not slow-moving. The goal is to do an entire parcel, and the sizes are going to vary for people.
 - Gregory said that he likens it to an oversize grass seed burn.
 - Gregory said that the fuel consumption is actually higher.
 - Katie said that she doesn't think that it is going to be concentrated for one area more than the other east of the Cascades.

- Jim R. said he has had discussions with NRCS and some of the extension people. They said that there are upwards of a million acres burned every three to ten years in the area that makes up the NRCS region. He posed the question of what is the best way to get a handle on emissions, and what the level of use is. What is the best way to approach this issue?
 - Katie said that going through a trusted entity like OSU's rangeland department, extension service, etc., will help. They already have relationships built with the landowners.
 - Jim B. asked if the extension agents send out newsletters.
 - Katie said that the extension agents, and Cattlemen and Farm Bureau send out newsletters.
 - Stephen said that there should be a little more of a formal process to collect this information anonymously. There should be communication with these agencies.
 - Katie said that more education at the local meetings where people can see you in person will help spread the word around a little quicker.
 - Stephen said that he will try to get more information from Rick on data.
- Jim R. said that when dealing with agricultural issues a lot of states have legislative restrictions on controlling burning. It depends from state to state whether the particular entity views if they have protection from regulation.
 - Katie said she feels there is protection in certain areas. Their feelings of protection are getting less and less. Since this is an area that hasn't really been regulated on the east side, there maybe is a feeling of protection there. There is a lot of concern with governments. There really isn't a lot of trust.
 - Brian J. said that it would be a good idea to let the legislature know what the committee is doing if they are going to make these contacts. Or at least let the key legislatures know in case their office gets a call, rather than getting upset, maybe they can quell the matter.
 - Katie said that the Farm Bureau is getting a better idea of what other states are doing. When you look at California's air quality issues and the regulations they've put in there, if anyone's aware of what's going on, it kind of stirs some fear in people of what could come in the future here. She doesn't think people are that aware yet, but that's something once you start calling around and asking, it could be frightening for folks.

8. Public Comment

Leonard Gondek, representing field burning from Douglas County, offered comments in the morning session on Rangeland and Private Land Burning.

- Leonard said that Douglas County has one fairly good-sized operator that does grass seed farming. Most of the county's burning is hillside pasture. Usually, every three years or so, they do enhanced sub-grower production. They work very closely with Douglas Forest Protective Association (DFPA) with fuel management. DFPA issues the burning permits. A lot of the burning is done close to public roads. They burn ½ to 1 ton per acre. Burn sites are usually 20 acres; some are 100 acres. Usually in a half hour the smoke is gone. There is really no tremendous volume of smoke impact. They do pay attention to smoke management. The DFPA will not write permits if there is a chance of places like Roseburg or Grants Pass being impacted by smoke.

Discussion:

- Jim R. asked what the scope of the burning is; how many acres on annual basis & what's the season.
 - Leonard said that they start some burning in early July. Most of it will be in latter August and into September. In 2002 Douglas County only burned 9000 acres, that was 973 permits, which were small acres. The biggest year was 13,109 acres last year, that was 1109 permits. They are not big burns. Using common sense plays a big factor in their determination of burning permits.
 - Mike Z. said that he has burn data from DFPA.
- Gregory asked how many farmers are burning on an annual basis.
 - Leonard said that a lot of them can be counted by number of permits. A lot of them aren't bonified farmers. The bonified farmers are probably ten or less. Most of them are hobby farmers with small acres.
 - Gregory wanted to know if there has been an increase in the hobby farmer burning and a decrease in the bonified farmer operating, and what does he think will happen in the future?
 - Leonard said that he doesn't think it will change much. He has records from 1997 all the way through last year and it stayed fairly consistent.
- Jim R. asked what type of information DFPA takes on the permit. He said the committee wants to be able to do tracking and get a feel for what the burning is. If they're asking for basic things like location, acres, and when to burn, that would be informative.
 - Leonard said they inspect each unit. They inspect the fire lines. Quite often, for instance, the ranchers will have a DFPA representative on site when they burn, and it's a training program for them. Riddle has a local fire department and they will come and ask to do practice burns, and they will set up for them to do a private burn so they can do training.
- Leonard said DFPA has a good program and feels it would be a real detriment if there was a fee assessed for burning. People probably wouldn't burn, and others may start burning that shouldn't. Leonard said that he is on a committee that looks at land classification that looks at grassland versus rangeland and forest lands. One of the criteria they use for grassland is what would be the severity of controlling a fire on this protected type land.
- Leonard confirmed that the purpose of the burning is to reduce the possibility of fire, weed control, and in some cases to remove competition for a certain species. When they burn around homes it's for safety.
- Brian F. wanted to know if they coordinate much with DEQ in Roseburg, and are there many complaints that come as the result of this.
 - Leonard said he couldn't think of any complaints about their hillside or grassland burning. They don't coordinate with DEQ.
 - Stan indicated that a lot of their weather comes from the lookouts when they are manned in the summer. They have a pretty good feel of what's happening around there in all directions. He clarified that DFPA is a private association that contracts with the State.
- Mike D. pointed out that DFPA is a cooperative firefighting association within the state of Oregon. The Associations' primary focus is fire issues in their local areas. DFPA invests in a public information officer that during the summer months keeps the fire presence in all of the local media and the people in the county really understand the values of resource management and trade-offs between prescribed fire smoke versus wildfire smoke. DFPA's program has huge amount of benefits for training purposes, for fuels reduction, home safety,

etc. Mike said that the amount of reporting will help for the tracking system. They don't want to intentionally get into the fee structure, but it's the tracking purposes so they can understand where smoke's coming from. Mike asked Leonard that from his perspective if it's any kind of a problem to fill out the permits and forms that they give that it's kind of an imposition.

- Leonard said that they sign the permits and he didn't think that would be a problem. He said that most people will follow the rules and regulations.
- Mike D. asked if most of these areas that he's talking about are still classified as Class III forestland?
 - Leonard said that they are essentially rangelands/grazing lands.
- Leonard said that DFPA has been doing urban rural interface treatment for a long time.
- Gregory commented that the DFPA program seems to be a success story. A program designed to manage for fire suppression and not losing fires has evolved into something that's working well to meet a variety of air quality and smoke management differences. He believes that as the committee looks to the future, what do they need to learn from DFPA's program, and his peers' program, that they can apply to what has been unregulated lands. He indicated places such as eastern Oregon. There are also places in Jackson and Josephine county and outlying areas. He asked Jim how do the forecasters set burn parameters, and what is their relationship with the DFPA program, or is there any.
 - Jim T. said that for forest burning, DFPA is probably one of the most frequent callers. For this program, that Leonard described, ODF meteorologists aren't consulted..
- Brian F. wanted to know if there was someone from DFPA that makes the decision for everyone else, or would a landowner make their own decision about where and when to burn, and what if everybody wants to burn at the same time?
 - Leonard said that the District Manager or his people will usually make the decision on whether they will permit it.
- Mike D. wanted to know if they have fees for a fire protection assessment on their lands.
 - Leonard said that there is an assessment on forestland, and a different assessment on grazing land, but there are no assessments on rangeland for fire protection. They all pay for fire protection in some way, either directly as a membership through DFPA or on a tax base.
 - Mike Z. said that the assessments are Class I, II or III forestland. Class I being primarily forests. Class II is a mixture of forest and grazing. Class III is primarily grazing. There is no rangeland in western Oregon. Rangeland is defined in Statute as only occurring east of the Cascades.
 - Stan pointed out that the quantities of the fuel being burned in the Douglas county area are really pretty light.

9. Charter Question F – 3rd Draft – Are designated areas and smoke sensitive areas adequately identified?

Gregory McClarren

Is there a problem?

- Gregory said that they inserted definitions. Their group will add the Special Protection Zone definition later.

Will there be a problem in the future?

- In the seventh bullet, it should read PM2.5.

What are the options to deal with it?

- The third referred to a receptor zone concept as opposed to a source zone concept. This will be a key point of discussion for later on.
- Jim R. indicated that when dealing with background levels many years ago, there was a figure that was given relative to a local area background in the contribution by the different sources to that background. As he recalls, at that time, the background was for Medford ten years ago. Only 4% of the background was attributed to smoke from prescribed burning. So when there is talk about designated areas or non-attainment, is there a need to revisit those assumptions relative to the effects from prescribed fire smoke or the contribution made that define these areas?
 - Brian J. said that if you have a maintenance area, you're not allowed to do anything that would potentially put it out of attainment, but that may be too simple. It doesn't matter what the background level is. It matters what incident caused it to go back out of attainment.
 - Brian F. said he agrees with that. Background levels a lot of times were just numbers that were pulled out of the air.
- Gary noted that all things being equal, the initial designation amount of attainment, is starting from square one. He said that anything that contributes an annual or 24-hour, start at that point.
- In regards to the fifth bullet, Brian F. wanted to know about areas that maybe low population but could be in the middle of a very, very active burning area year around. You may have special exemptions or special designated areas based on that factor.
- Jim B. said that in the fifth bullet it should read "e.g." instead of "i.e.".
- Jim R. said that the basic criteria for designation needs to be discussed.
 - Gregory said that he, Gary and Erik will look at what other criteria is needed to look at to determine designated area.
 - Gregory thought that maybe it would be better to go to one receptor set of terms and do away with SIP.
 - Brian J. suggested not calling it a designated area. Since by definition, a designated area is a high population center, or a principle population center.
 - Gregory said that if you change the criteria, you may end up having to change the DA definition.
 - Jim R. said that a designated area, or non-attainment area, is specific to the SIP. What they are doing is trying to protect the general public, campgrounds, etc., and come up with another designation that identifies it as being smoke sensitive, and can be incorporated.
 - Gregory indicated it was his understanding to leave the DA's alone as a definition because they're linked to the SIP. He wanted to know if the phrase "DA" as it relates to SIP solely a principle population concept.
 - Brian F. said that they don't have anything else in their SIPs that talk about it. They have non-attainment areas.

- It has been suggested that the population stays on the “Designated area” side, and the rest of it goes to the “Other areas sensitive to smoke”.
- Gregory asked Jim R. if he was suggesting that the definition of DA be principle population centers.
- Jim R. said that he wants a clear separation between a SIP and the smoke management plan. The DA’s are a product of the Smoke Management Plan and they’re what guide in terms of the forecast and anything else. He would opt that they use designated areas as principle population centers and use it as a basis for how to approach the Smoke Management Plan in the future.
- Brian F. wanted to clarify that other smoke management programs, and they fall back to the Willamette Valley field burning program are much more intensely managed because of the proximity of the population where the burning is taking place. In that program, the communities that are so-called designated areas are based on a combination of their population size, such as Eugene/Springfield, which rarely gets impacted, compared to the other communities that are so-called designated areas which are pretty much the populated areas that are on the east side of the Willamette Valley, that are typically downwind of the burning. That’s just one example of how designated areas have been kind of hand-picked based on population to a certain degree because you have communities like Sweet Home and Lebanon. They historically get the brunt of the smoke when there’s burning taking place, so they’re monitored and they’re listed in terms of smoke intrusions. But you have other communities like Albany that’s a bigger population area that’s not. That’s one example of how you approach designated area.
- Steve said that it’s population and proximity.
- Brian F. said that it’s a little unclear that if you designate an entire valley as a designated area, then how do you track the success of protecting that area.
- It was said that the entire valley is looked at like it is one entire city.
- Gregory said that the DA definition will be limited to principle population centers. The last two sentences of the existing definition will be moved to “Other areas sensitive to smoke”.

What are the Barriers and Opportunities?

- Opt to skip over right now. There may be more that come out after the group makes changes.

Will it require changes to rules, statute or directive?

- Gregory doesn’t believe it will require changes to the ORS based on what they showed earlier. It will require a change to a rule and probably a directive.

Committee Recommendations

- It was recommended to put DAS under receptors instead of sources. That would get rid of restricted areas.
- The consensus was to be able to report, track and monitor throughout the state.
- The point would be that the whole smoke management program has emphasis on achieving the land management goals and keeping the smoke out of the areas, i.e. the receptor areas.
- Brian F. said that he understands the desire to have the clearest definition that they can and that this mixture of a receptor area versus population center is confusing, but he wouldn’t

necessarily throw the whole concept out automatically. There is some merit for trying to control the level of burning close to sensitive smoke areas, which is what SPZ's are all about.

- Stephen said that you can still control that with the receptor idea through the smoke management plan. The smoke management plan would regulate the amount of burning even in areas of close proximity.
- Brian F. said that the arguments that were originally used for special protection zones were that you didn't want to have burning going on at the same time that you were trying to implement the woodstove protection program. You didn't want people to see burning going on in any vicinity of the non-attainment area when you're flashing yellow and red woodstove advisories. Partly, it's common sense of why put up an additional emissions source that could contribute directly to the non-attainment problem which is woodstove related.
- Mike Z. said to keep in mind the receptor and source difference. If you do away with the source definitions (restricted area especially), does that mean we have the same requirements statewide as far as daily burning restrictions. If so, that means that east of the Cascades becomes stricter in what we're doing right now. Or, it means western Oregon becomes less restrictive and people can burn using our instructions as advisory. You're going to have to differentiate that in the definitions or in the rules.
- Mike Z. said that what he is hearing the sub-group saying is do away with restricted area examples. He said that having a restricted area gives the authority in western Oregon and the Deschutes to require daily burn permits year-round for burning and where burning has to follow burning instructions. Everywhere else ODF doesn't require burn permits year-round, and burning requirements are done on a voluntary basis as far as if burners need to follow their forecast.
- Jim R. said that he would propose finishing up their recommendations and come back the next time.
- Gregory said that they are going to try and look at what the population was ten years ago and what the present population is and what the trends are. That would be a way for the smoke management plan to be flexible and adaptive to the future without having to go through elaborate rule changes.
- Mike Z. - a question was asked if burning requirements and restrictions are in effect year-round? That's when there is burnin, prior to burning, whether there is a written forecast or not, districts and forests still have to consult with the forecaster. The only seasonality is when issuing written forecasts. Otherwise, seven days a week, 365 days a year, burners are required to comply with whatever requirements are in place in smoke management program.
- Gregory said that everybody seemed to like the idea of creating a new term for "other areas sensitive to smoke". He wanted to know if there were any suggestions.
- Jim B. suggested that for all of the restricted/designated area, and all regulated areas, make a descriptive term – fee required, permit required, permit voluntary, or whatever - to say exactly what it is you want people to do in those places.
- Brian J. said that he doesn't see any advantage to eliminating the restricted area. If you eliminate the restricted area, how do you know where you need a permit? If you don't need a permit, how are you supposed to control burning? In addition to that, he sees absolutely no

sense in eliminating special protection zones, and would suggest that Eugene, Oakridge, Grants Pass and Medford be retained. Most people would probably agree with him. He's not saying you have to expand them, but he can't see anything gained by eliminating them.

- Gary said that Brian J. makes a good point. They were trying to look for simplicity, but also trying to hear some rationale about why simplicity is probably unrealistic. He thinks that the terminology here "other areas sensitive to smoke" covers those types of things.
- Jim R. asked Brian how does he use the special protection zone for Eugene/Springfield inside the designated area for the Willamette Valley.
- Brian F. said that it's two different concepts. Eugene/Springfield is a designated area year-round so you're trying to keep the smoke from impacting that area. The SPZ is wintertime only to control the actual burning that is taking place close in to Eugene/Springfield so you don't run the risk of contributing to a wood stove smoke impact.
- Jim R. asked why not change SPZ to wintertime curtailment burning?
- Brian F. said that there are two problems that they've come up against. One is that smoke management programs – the better they get, the more complex they get. When they get complex, then the challenge is to try and come up with terminology people can understand without spending a lot of time. If you can define them by what they do and what they mean, then you're getting close to where you want to be.
- Gregory said that what this comes down to on this existing is a meteorologically, geographical combination; provide some special conditions at certain times of the year. Population is not the whole thing.
- Gregory's group will come back in September with the next version of this draft.

10. Adjourn

Stephen stated September projects:

- Final Draft of Question C – Lee, Erik
- Second Draft of Question E – Brian F., Brian J.
- Fourth Draft of Question F
- First Draft of Question H – Jim B., Stephen, Brian F.
- Final Draft of Question D – Jim R.

For October projects:

- First Draft of Question J – Brian J.

The SMCR Meeting adjourned as scheduled.

Next Meeting September 30, 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

Charter Question D: How should wildfire versus prescribed fire impacts be addressed?**Is there a problem ?**

Yes - Smoke from wildfires has historically been more of a health risk than all forms of burning combined within the State. The current smoke management plan is silent on the public and visibility impacts of wildfire smoke. The concept of considering wildfire smoke emission within the SMP is new, but without this inventory and tracking consideration it will be difficult to chart further progress under the Regional Haze Rule and to track substantive change in total emissions (i.e. wildfire and prescribed fire) under the plan as a way to demonstrate potential trade-offs.

(A data gap and research needs exists to demonstrate the variation in wildfire emissions and prescribed fire emissions by geographic areas around the state)

Current tracking of prescribed fire emissions compared against estimated historical wildfires smoke emissions has been done in NE Oregon in order to demonstrate this tradeoff between wildfire and prescribed fire emissions.

Will there be a problem in the future?

Yes – Wildfire frequency and acres burned are generally increasing throughout the state, with the highest levels of wildfire acres burned and smoke emissions occurring in those areas that have a highest fuel hazard and ignition risk. This is primarily in the southwest and eastern geographic areas of the state.

The public does not understand the logic and theory behind the premise that increasing the level of prescribed burning will ultimately reduce the wildfire acreage burned and total smoke emission produced over time. Public acceptance of the use of prescribed fire is key to the long-term maintenance of any prescribed fire program regardless of the geographic area in which it is being planned. Tracking of the change in wildfire and prescribed fire acres burned over time is the key to both gaining public understanding and acceptance of the long-term strategy needed to meet emission reduction objectives on a state-wide basis. .

What are the options to deal with the current problems?

Expand the Smoke Management Plan (SMP) emission tracking responsibility to include wildfire and wildland fire use emission in order to develop emission inventories for both public and private land wildfires within the State. Include wildfire acres, location, and fire behavior just as the State requires prescribed fire data reported through FASTRAC, under the federal system, and as part of the permitting process for private land prescribed burning.

Convince the other prescribed burners (i.e. agricultural and rangeland) in the state of the benefit to track and report all prescribed burn data and information into a central data base to be used as part of the Regional Haze State Implementation Plan (SIP) and potentially in the development and establishment local attainment/non-attainment areas for PM2.5. (There would be a shared responsibility for management of database between ODEQ, ODF, and ODA. This activity could be contracted or shared among the three primary state agencies.)

This data set will improve the geographic area specific forecast that will be generated along with improved science for emission estimations and validation. The process will also include proto-calls for complaint tracking and identification of health, visibility, and nuisance smoke impacts.

Will these options require changes in statutes, rules, or directives?

Additional tracking responsibility can be accomplished as part of the SMP Administrative Rule. This would include development of cooperative agreements between the three state lead agencies for tracking and storage of the data and information. The SMP can direct the Federal Land Management Agencies (FLM's) to transfer the wildland fire data, that they already are required to do by agency policy, along with the prescribed burning information used for smoke clearances at this time. . The majority of this information can be collected electronically from the FLM's.

What are the barriers and opportunities?

Getting consensus among the lead state agencies to collaborate on the data collection need and the methods for implementing the process. All SMP participants will have to view the need to collect wildland fire (Wildfire and Wildland Fire Use) information as being a high enough priority and a long term benefit to both the Westside, under the existing Oregon Smoke Management Plan, and the Eastside under the current voluntary and cooperative agreements.

The protocols for tracking emissions and complaints are not highly developed nor well coordinated. There is a need to modify the existing system for tracking emissions and complaint in order to facilitate a public dialogue and public education on the reason for using prescribed fire and the expected tradeoff between prescribed fire and wildfire emissions over time.

An opportunity exists to use the Fire Effects Trade-off Model (FETM) for specific geographic area analysis to develop a process for prioritizing where to treat, when to treat, and display the long-term (100-300 year) emission production by vegetative type for both wildfire and prescribed fire emissions.

Primary barrier is the availability of additional funding and staffing to operate the tracking and data storage system along with the cost of using very labor-intensive models such as FETM.

How will success be measured in the future?

A comprehensive emission inventories for all open burning sources will be in place for the State of Oregon. These EI will allow for charting total emission reduction/increases each year compared against the decadal target for the Regional Haze Rule designed to chart further progress towards 2064 and to compare the tradeoff between whether wildfires emissions (blacken acres) have been reduced compared with the total prescribed fire acres burned each year/decade.

Public understanding of the need to use prescribed fire will be enhanced and there will be fewer complaints from our publics concerned with the impacts of smoke generated from prescribed burning. Overall there will be better, more informed decision making on smoke management and the use of alternative treatments and emission reduction techniques by geographic areas that have the biggest effect on total emission reduction and while protecting life, property and resources from wildfire.

The Smoke Management Plan (SMP) acknowledges the tradeoff between PF and WF and sets objectives that attempt to reduce total smoke emissions as part of the SMP/RHR/SIP.

Overall there is better coordination among the state smoke regulatory agencies, less overlap for specific seasonal and geographic area allocation of burn days is achieved with less competition among landowners and agencies.

Question E: Regional Smoke Management – Draft 1 – September 1, 2004

Charter Question E: Evaluate whether changes are needed to the Oregon Smoke Management Program to improve regional air quality and visibility issues.

Matrix Questions: Narrative Description

Is there a problem?

Yes. The current plan only addresses regional smoke management in terms of interstate smoke management coordination with the State of Washington for prescribed fire. It does not address regional prescribed fire issues with other neighboring states (Idaho, Nevada, and California).

In addition, the plan does not address regional smoke management coordination between prescribed fire and major agricultural burning within Oregon, such as in the Willamette Valley, or rangeland burning in Central Oregon. It also does not address agricultural and rangeland burning outside the state, such as in southwestern Idaho. However, it should be noted that most of the major agricultural burning takes place during the summer months, when little or no prescribed fire is taking place in Oregon.

Finally, in addition to state coordination, the plan does not address burning coordination with tribal lands. However, at this time it is unknown how significant of a problem this is.

Will there be a problem in the future?

Yes. From a regulatory standpoint, the new Regional Haze Rule requires states to protect visibility by adopting “enhanced” smoke management programs that include regional planning and coordination of open burning sources. This requires addressing prescribed fire both inside Oregon and in neighboring states such as Washington, Idaho, Nevada and California, that can affect visibility in any Class I area. This coordination of burning also needs to take into account areas of agricultural burning both inside and outside the state that can affect visibility. The Oregon Department of Environmental Quality (DEQ) will need to address regional coordination of prescribed fire, agricultural and rangeland burning in the next phase of regional haze plan development, scheduled for 2007.

Related to regional haze is the need to protect visibility in the Columbia Gorge National Scenic Area. In the upcoming years DEQ and the state of Washington will be working jointly to develop a visibility protection plan that will be adopted by the Columbia Gorge Commission. Enhanced smoke management protection in the Gorge may be an important part of that plan.

In addition to the need to protect visibility, there may be future situations where regional smoke management is needed to better protect public health from short-term smoke impacts. For prescribed fire, there have been recent cases of interstate smoke problems between southern Oregon and northern California, northern Oregon and southern Washington, and eastern Oregon and western Idaho. Although these cases are rare, they may be a problem in the future if prescribed fire levels increase. Improving regional coordination between numerous state agencies could be a major challenge. This coordination is needed to better protect against future interstate smoke impacts.

What are the options to deal with potential future problems?

For regional smoke management of prescribed fire, interstate coordination between Oregon, Washington, Idaho, Nevada and California could be addressed through interagency agreements or memorandum of understanding (MOU) between the state agencies. Daily smoke management coordination of planned burning activity, projections of interstate smoke transport, and emissions reporting should be included in these agreements. In addition to

prescribed fire, these agreements could also address regional smoke management coordination of agricultural and rangeland burning, where it has the potential of causing Class I visibility (regional haze) impact or public health problems.

Within the state, improved coordination of prescribed fire, agricultural, and rangeland burning could also be accomplished through agreement or MOU. This coordination would be between ODF, the Oregon Department of Agriculture, and the counties which operate local smoke management programs.

In terms of improving coordination with tribal lands, the Environmental Protection Agency (EPA) could be more closely involved in this effort. This could also be addressed through similar types of agreements.

Will these options require changes in statutes, rules or directives?

Increased regional smoke management coordination could be addressed through interagency agreement/MOU, or by administrative rule. No statutory changes are likely needed. However, in most cases it would require DEQ to revise the Oregon SIP to incorporate these changes.

What are the barriers and opportunities?

One barrier to improving regional smoke management coordination is the overall complexity of coordinating burning on a daily basis with so many states and smoke management programs. A second barrier is finding additional funding for the work associated with daily forecasting and projecting smoke transport on a regional level. A third barrier is possible resistance by states to make any changes to their existing programs to address regional transport out of concern this may limit burning opportunities. Finally, it may be difficult for states to reach agreement on a protocol for conducting burning to avoid regional/interstate smoke problems.

One opportunity for overcoming these barriers is assistance from the Western Regional Air Partnership (WRAP). The WRAP has been helping states adopt Enhanced Smoke Management Programs to meet the Regional Haze Rule. For regional smoke management, they could provide technical assistance for fire and emission modeling, meteorological forecasting, and assistance in preparing interagency agreements and MOU for states and tribes.

Another opportunity for overcoming these barriers is assistance from EPA through funding or other support similar to the WRAP.

How will success be measured in the future?

Success in terms of increased regional smoke management coordination for prescribed fire would be measured by improvements in Class I area visibility, fewer interstate smoke intrusions, and fewer public complaints from interstate smoke transport, while continuing to meet the objectives of the Oregon Smoke Management Program.. Success in terms of increased coordination of prescribed fire, agricultural burning, and rangeland burning would be greater knowledge of all emission sources in the region, and those indicators mentioned above.

3rd *Draft 23 AUG 2004*

Charter Question F

Are designated areas and smoke sensitive areas adequately identified?

Matrix Questions: Narrative Description

Is there a problem?

First, some context needs to be established. Oregon Revised Statutes states:

“477.013 Smoke management plan. (1) For the purpose of maintaining air quality, the State Forester and the Department of Environmental Quality shall approve a plan for the purpose of managing smoke in areas they shall designate. The plan shall delineate restricted areas to which this subsection applies. The plan shall also include distance of the burning from designated areas, All burning permitted within the restricted areas shall be according to the plan.”

Definitions are described in OAR 629-43-043:

- **“Designated area”** - Those areas delineated in Exhibit 2 (in this rule) as principle population centers. Includes major recreation areas in the state during periods of “heavy use”. Heavy use is defined as “unusual concentrations of people using forest land for recreational purposes during holidays, special events.”
- **“Restricted areas”** - that are delineated in Exhibit 2 for which permits to burn on forest land are required year round pursuant to rule 629-43-041.
- **“Other areas sensitive to smoke”** - are intended to consider specific recreation areas during periods of heavy use by the public such as coastal beaches on special holiday, federal mandatory Class I areas during peak summer use, special events. All Oregon and Washington Class I areas shall be considered as areas sensitive to smoke during the visibility protection period, defined in the Oregon Visibility Protection Plan, OAR 340-20-047 Section 5.2.
- **“Special Protection Zone”** – [where is definition located?]

The succinct answer is: “the existing SMP appears to be working well as it relates to this Matrix question.”

Will there be a problem in the future?

Yes, because certain difficulties can be expected. These include:

- It appears these areas may be poorly defined.
- Protocol to change designations doesn't appear to exist (except for non-attainment areas or AQMAs).
- Terms are difficult to understand.
- Current maps are inconsistent in scale and quality and boundaries are not clear.
- All areas in need of protection may not be identified e.g. emerging population areas, increasing population (may expand boundaries) and WUI areas.
- Regional haze.

- Probable new Pm2.5 standards (new DA's may surface).
- Geographical differences - more burning in specific regions.
- Poorly integrated regulations and loosely defined jurisdictions exist between local, State and Federal authorities.

What are the options to deal with it?

- More clearly defined boundaries
- Utilize GIS/GPS maps on a computer-based system
- Aim for one designation with equal protections
- Develop a “safety net” protocol. {DELETE THIS ONE}
- Some areas may require more intense management (i.e. those with a high potential for winter time inversions and rapid smoke build up).
- Seasonal restrictions may no longer be valid or needed and in some cases may hinder meeting air or land objectives.
- Strengthen coordination with ODOT and Public Safety Agencies

What are the Barriers and Opportunities?

Barriers:

- Natural resistance to change;
- Increased workload for program during change to new system;
- Funding; and
- Technology adoption i.e. GIS

Opportunities:

- Streamlined program [rather than many definitions];
- More effective & greater efficiencies;
- Clarity;
- Consolidated OAR’s, Directives and statutes (minimize conflicting and confusing direction);
- Greater responsiveness and increased credibility by citizenry.

Will it require changes to rules, statute or directive?

Not in ORS, but probably in OAR and directive. ODF Staff to assist with the actual re-write.

Recommendations:

- One designation or a limited # of differences e.g. focus solely on receptors
- Eliminate source i.e. Special Protection Zone, terminology since all burning statewide on forest land will require a permit or registration
- Consistent state regulations - Statewide no differences between AQMA, SPZ, DA, etc
- Adaptive to NAAQS / Regional Haze Changes
- Look at population 10 years ago, and overlay with present population (i.e. use GIS) PSU population center.
- Update maps (GIS based)
- Use year round - no seasonality

Following are comments/questions we need to work on and maybe come up with some suggestions.....[italics are original comment/person....my thoughts are in plain text {Gregory’s}]

□ *Comment from Mike Z.:*

Wants us to define boundary or basis for category / restriction.....

IDEAS ----- So shall we propose UGB where there is not an AQMA?.....If not UGB then what is simple and logical and that would self-adjust over time?.....I would certainly think that ALL non-attainment areas would be DAs but what do we use to define the boundary....Do we add all Class I areas as DAs? [if not why not?]...... I suggest we talk with forecasters about this and the elimination of source terminology i.e. SPZs]...remember entire state will be regulated e.g. restricted.....

□ *Comments from Brian F.:*

Winter time restrictions need to be revisited [what is meant here?]

May be needed to maintain compliance (maintenance plan?)

Regional haze rule / visibility - some states are making Class I areas - designated areas..

IDEAS ----- Is the notion of seasonal restrictions a remnant of past days that is no longer practical? [my leaning is just that; we should manage smoke year-round]....Do we add all Class I areas – DAs?.....How do we take into account Regional Haze Rule this revision of SMP? [or do we at all BUT talk about a future need to address]

□ *Comments from Brian F.:*

I.e. if local air quality is poor...

I.e. all over the region...

All populated areas in the region become an area sensitive to smoke.

□ *Comment from Jim R.:*

DA - non-attainment areas even [see response to Mike Zs comments above]

□ *Comments from Brian F.:*

If have attainment plans, still a D.A. because requirement is in SIP. But SPZ is supposed to go away if no longer in non-attainment. But, may stay if in maintenance plan. We are charged with considering this.

IDEAS ----- I like the fewest number of definitions/terms and I like the idea of few exceptions.

□ *Comments from Jim R.:*

Reference: 6/19/2003

Smoke management definitions and terms.

Also look at October / November 2003 Minutes