

Oregon Smoke Management Review Committee  
2600 State Street  
Salem, Oregon 97310

October 24, 2017

To the Oregon Smoke Management Review Committee:

On behalf of the Harney County Restoration Collaborative and undersigned members, we submit the following recommendations to be incorporated in the Oregon Smoke Management Plan review. The goal of our collaborative group is to restore healthy and resilient forests while providing social and economic benefits to the local communities in and around the southern portion of the Malheur National Forest in eastern Oregon. We provide a forum for stakeholders with diverse interests to collaboratively develop projects with the United States Forest Service that are mutually beneficial.

The Harney County Restoration Collaborative has been working for nearly a decade to improve the health and resilience of fire-adapted forests and forest-dependent communities. Our experience, coupled with broad scientific support, suggests that scaling up our use of prescribed fire in conjunction with mechanical thinning is the most effective way to protect, restore, and enhance the myriad ecological, economic, and social benefits that our forests provide, as well as mitigate the risk of large wildfires to the public, firefighters, homes, private property, and critical infrastructure. Yet, every year we fall further and further behind in the implementation of this critical tool.

Dry forests in Oregon evolved with frequent, low severity fires. In these forests, no fire is not an option. A hundred years of fire suppression has filled them with fuels. They are ready to burn, and the problem is only growing worse year by year. The only real question is whether we will burn them in a controlled situation or let nature manage them through wildfire. In a prescribed fire, we have influence on how much timber volume is lost (usually very little, e.g., 1-2%), how much wildlife habitat is compromised (very little), and how much human communities and resources are affected (very little). Prescribed burn professionals can use upcoming weather forecasts to plan prescribed burns for days when the wind will be blowing away from towns and the smoke impacts to communities are minimized.

By contrast, science increasingly suggests that recent wildfires are burning more intensely and across much larger area. Consequently, substantially more material is burned, more smoke is produced, and values that we care about, like wildlife habitat and a sustainable timber supply, are compromised. Further, we have no control over the random directions the wind happens to be blowing when they start. As this fire season has demonstrated, wildfires can result in sustained poor air quality for weeks to months. In short, wildfire destroys more economic value, produces more smoke, and is more likely to send that smoke to sensitive areas.

Recent wildfires, such as the Canyon Creek Complex, which burned 110,000 acres of forest and over 40 structures near John Day in 2015, demonstrate that this is a problem that cannot wait any

longer for a solution. Unnaturally dense forest conditions, coupled with a warming, drying climate, have created conditions for extreme wildfires and dangerous smoke that threaten our wellbeing, our way of life, and our future. This is not acceptable and we urgently seek a change.

We are asking the Committee and its sponsoring organizations – the Oregon Department of Forestry and the Oregon Department of Environmental Quality – to carefully consider the following proposed revisions (see also Attachment A) to the Smoke Management Plan:

- Incorporate language that reflects differences between dry and wet forests and their respective fire regimes
- Align Oregon’s smoke policy with EPA’s empirically-based 24-hour air quality standard
- Prioritize high-risk/high-value treatment areas, such as Wildland Urban Interface (WUI) zones, with maximum flexibility and opportunity to implement prescribed fire
- Develop and implement a public health strategy to protect people from short-duration prescribed fire smoke

Although we acknowledge that there are many barriers to increasing the scale of prescribed fire treatments, current smoke management regulations contribute significantly to its limitation. Changes to Oregon’s Smoke Management Plan are necessary for a meaningful increase in prescribed fire treatments.

We recognize that increased prescribed fire will have short-term increased health impacts. However, we believe that these will be less than the impacts of wildfire. We look forward to working with the public health community to find creative ways to resolve this problem.

In conclusion, our experience in Harney County has corroborated what forest scientists and researchers have shown with increasing clarity in recent years: to mitigate the severity and impact of future wildfires on the things we care about, we must be able to implement more prescribed fire treatments across our local forest landscape. To achieve this outcome, we need a smoke management regulatory framework that enables increased opportunity to burn, while establishing innovative measures that address short-term air quality concerns *and* reduce the longer-term risks posed by wildfire. We believe the proposed revisions outlined above accomplish both goals.

We are closely following the Committee’s work and trust that you will thoughtfully consider how to incorporate the input of our collaborative group when crafting recommendations that reflect the needs of Oregon’s fire-adapted forests and forest-dependent communities.

Respectfully,

Harney County Restoration Collaborative Members

## **Attachment A: Proposed revisions to Oregon’s Smoke Management Plan**

### **REVISION RECOMMENDATION:**

Incorporate language that reflects differences between dry and wet forests and their respective fire regimes

#### **Revision Rationale:**

There are substantial differences in the natural role of fire across the many forest types in Oregon. Dry forest types (primarily southwest, central and eastern Oregon) naturally had frequent fire, and have different ecological, economic, and social reasons for prescribed fire use than wet forests (primarily west of the Cascade crest). By incorporating language that reflects the inherent differences between dry and wet forest types and their respective fire regimes, such a revision would acknowledge an important scientific difference lacking in the current plan. Empirical evidence supports the use of prescribed fire in fire-adapted forests as the most effective management tool to mitigate wildfire severity and effects.

#### **Revision Goal:**

The goal of this revision is to provide an objective, science-based rationale to support other proposed revisions that would increase flexibility for prescribed fire use (particularly in forest types that are high-priority for prescribed fire) as an essential treatment to increase forest health/resilience, mitigate risks to ecological, economic, and social values (including public health) posed by wildfire, and better account for tradeoffs between prescribed fire and wildfire.

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### **REVISION RECOMMENDATION:**

Align Oregon’s smoke policies with EPA’s empirically-based 24-hour air quality standard

#### **Revision Rationale:**

The current one-hour standard is substantially reducing the number of days prescribed fire teams are allowed to do their work. The federal Environmental Protection Agency’s 24-hour National Ambient Air Quality Standard (NAAQS) and the tiered Air Quality Index (AQI) for public health concerns are empirically-based. We should use those standards. While caution is well-advised, the difference between the national and the State standards are so substantial, that we are causing unnecessary hardship. If additional caution is needed, further improvement to the definition of smoke incidents and intrusions could be made by incorporating additional metrics and measurement techniques, such as spatial extent and timing/time of day, to better understand, track, and mitigate short-duration prescribed fire smoke impacts on communities, people, and sensitive groups.

#### **Revision Goal:**

The goal of this revision is to address one of the critical enabling conditions that would facilitate a meaningful increase in high-priority prescribed fire treatments, namely the “no smoke intrusion” objective in the current Smoke Management Plan. Realigning the definition of smoke incidents and intrusions consistent with NAAQS and AQI and establishing a “minimize smoke incidents and intrusions” objective, with additional metrics to better measure

short-duration prescribed fire smoke impacts would facilitate expanded burning opportunities while remaining consistent with current and future science-based air quality policy.

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**REVISION RECOMMENDATION:**

Prioritize high-risk/high-value treatment areas (such as the Wildland Urban Interface) with maximum flexibility and opportunity to implement prescribed fire

**Revision Rationale:**

In some areas – such as the Wildland Urban Interface - wildfire risk to critical ecological, economic, and social values is much greater than impacts of prescribed fire (including short-term exposure to smoke). These areas should be pre-identified at a county and local forest level (drawing from past, present, and future planning efforts such as Community Wildfire Protection Planning and Quantitative Wildfire Risk Assessment efforts). Greater flexibility should be provided to increase the window of opportunity when prescribed fire can be used to mitigate wildfire risks in these areas.

**Revision Goal:**

The goal of this revision is to allow a process to identify and spatially prioritize areas within local forest landscapes where wildfire risk to important ecological, economic, and social values supports and justifies maximum flexibility and opportunity to implement prescribed fire treatments (including allowances for increased smoke and incidents/intrusions up to 24-hour NAAQS/AQI threshold) that mitigate wildfire risk.

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**REVISION RECOMMENDATION:**

Develop and implement a public health strategy to protect people from short-duration prescribed fire smoke

**Revision Rationale:**

Increased flexibility and opportunity to implement prescribed fire will increase prescribed fire smoke, some of which is likely to enter communities adjacent to high-priority treatment areas. Consequently, these changes should be accompanied by a complementary strategy to protect communities, the public, and sensitive groups from short-duration prescribed fire smoke impacts. This revision would establish a collaboratively-developed public health strategy, protocols, and resources specific to prescribed fire smoke and air quality concerns similar to the *Oregon Wildfire Response Protocol for Severe Smoke Episodes*.

**Revision Goal:**

The goal of this revision is to establish new language and/or references within the Smoke Management Plan that outline a common strategy, resources, and protocols that support collaboration between land managers and local, state, and regional public health organizations to protect communities, the public, and sensitive groups from short-duration prescribed fire smoke exposure during prescribed fire smoke incidents and intrusions.