



OREGON CHAPTER SIERRA CLUB

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

January 22, 2018

To the Oregon Smoke Management Review Committee:

On behalf of the Oregon Chapter of the Sierra Club, we would like to voice our support for the increased use of safe and effective prescribed burning in Central Oregon's forest. The Sierra Club supports the use of science-based restoration projects to improve forest health and resiliency while reducing the risk of stand replacement canopy fires that can threaten communities. Prescribed fire plays an essential role in forest restoration, and needs to be increased to allow us to restore the forest to its historic state.

We have learned that prescribed burning under controlled conditions in the spring and fall allows the Forest Service to reduce the risk of larger uncontrolled fires during the heat of the summer. This summer's Milli Fire near Sisters once again demonstrated the importance of prescribed fire as the most effective tool we have available to reduce wildfire risk to our communities and the people who live, work and play in our forests, forests that are the backbone of our economy and our way of life.

We know that in order to increase the use of prescribed fire we need meaningful reforms to Oregon's smoke management rules. The recommendations outlined in the attached letter from the Deschutes Collaborative Forest Project represent a viable and holistic strategy that would enable greater use of prescribed fire to counter the trend towards larger and increasingly severe wildfires, and the serious social, economic and ecological impacts those wildfires cause in our forests and communities.

We are asking the Committee and its sponsoring organizations – the Oregon Department of Forestry and the Oregon Department of Environmental Quality – to incorporate the following proposed revisions to the Smoke Management Plan:

- Incorporate language that reflects the difference between dry and wet forests and their respective fire regimes.
- Align Oregon's smoke policy with the EPA's empirically-based 24-hour air quality standard.
- Provide maximum flexibility to implement prescribed fire in prioritized high-risk/high-value treatment areas, and;
- Develop and implement a public health strategy to protect people from short duration prescribed fire smoke.

While we recognize that increased prescribed fire may lead to small increases in short-term smoke impacts in our communities, we also recognize the need to fight wildfires before they happen. It's important to remember that there is no smoke-free option to living in Central Oregon, a fact that was driven home very clearly this past



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summer. The question is: are we applying prescribed fire strategically in the forests around our communities to reduce the likelihood of severe wildfires (and their smoke) that last for weeks in the summer and have far-reaching negative consequences on public health, local economies and the long-term resilience of our forests?

Ultimately, we support a more holistic solution to prescribed fire and smoke management than what is currently provided by state policy. We believe that the short-term impacts of prescribed fire will be far less than the impacts of wildfire. While near-term exposure to smoke may be reduced by limiting prescribed fire now, it would come at the expense of future Oregonians who will face increasingly severe wildfires and wildfire smoke. We ask that you carefully consider strategies to increase the use of prescribed fire while protecting air quality and the health of our communities in the long run.

Respectfully,

David Stowe

Oregon Chapter Sierra Club

Representative on the Smoke Management Review Committee