

Oregon Smoke Management Review Committee  
October 19, 2017  
2600 State Street  
Salem, Oregon 97310



To the Oregon Smoke Management Review Committee:

On behalf of the Southern Oregon Forest Restoration Collaborative (SOFRC) we submit the following recommendations for the Oregon Smoke Management Plan review. Our input is based on experience working to enhance forest health and resilience across the Rogue Basin on both public and private forests, including lands managed by the Medford BLM and Rogue River-Siskiyou USFS. This experience has not only taught us that prescribed fire treatments are essential to our ability to protect, restore, and enhance the myriad ecological, economic, and social benefits that our forests provide, but that we are falling further and further behind in the implementation of this critical tool. This is particularly true as we attempt to use prescribed fire in and around communities, Smoke Sensitive Receptor Areas, and other highly valued portions of our forested landscapes to mitigate wildfire risk to the public, firefighters, homes and private property, and the forest itself.

SOFRC, as a non-profit forest restoration collaborative, recognizes that smoke from forest burning is a critical public health issue, and we share in the long term goal of reducing smoke impacts. Over the past summer, many Oregonians have experienced smoke inundations for weeks at a time from local and regional wildfires that resulted in unhealthy to hazardous levels of air quality. Unfortunately, given the facts that our dry, fire-prone forests have experienced an unnatural buildup of fuels, and that the climate is warming, the risk that more of these large, hard to control wildfires will occur is ever growing. The data suggest that such wildfires are becoming larger and more intense, with increasingly severe consequences.

Prescribed fire treatments are used in the context of forest restoration. Forest restoration projects often include an initial mechanical fuels reduction, which is designed to “step down” fuel loads prior to prescribed burning. Research and ample experience has shown that forest restoration can reduce the intensity and duration of wildfire to homes, communities, infrastructure and forests, including less smoke production. Research also suggests that wildfires generate far more particulate matter per area burned than prescribed fires, which occur under carefully monitored conditions and typically burn at lower intensities.

In the context of fire-adapted forest management and restoration, we believe Oregon’s current Smoke Management Plan inadequately reflects the essential and inevitable role of fire in sustaining our fire-adapted forests and protecting our forest-dependent communities. We are concerned that the current rules do not recognize the use of prescribed fire treatments to emulate natural fire. In our dry, fire-prone forest types, fires will inevitably occur, which is why we use prescribed fire to more compatibly balance short-term risks (such as prescribed fire smoke

exposure) with long-term consequences of unnaturally severe wildfires that threaten to disrupt ecological, economic, and social values (including public health) over much longer timeframes.

We are asking the Committee and sponsoring organizations – the Oregon Department of Forestry and the Oregon Department of Environmental Quality – to 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;
- Provide maximum flexibility and opportunity 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.

Our goal in identifying and prioritizing these areas for revision is twofold: 1) facilitate changes to Oregon’s Smoke Management Plan that are necessary for a meaningful increase in high-priority prescribed fire treatments, while 2) also outlining a more holistic strategy to measure and respond to public health concerns associated with planned, short-duration prescribed fire smoke impacts to communities and people.

In conclusion, our experience in the the dry, checker-boarded landscape of SW Oregon’s dry forests has corroborated what forest scientists and researchers have shown with increasing clarity in recent years: in order to mitigate the severity and impact of future wildfires on the things we care about, we must have greater flexibility to implement prescribed fire treatments, particularly in high-priority areas within our local forest landscape. To achieve this desired 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.

Without these changes, we will continue to fall further behind, placing the people and forests of SW Oregon at increasing risk and exposure to extreme wildfires, as well as dangerous levels of wildfire smoke. We are closely following the Committee’s work and trust that you will thoughtful consider how to incorporate the input of the Southern Oregon Forest Restoration Collaborative when crafting recommendations the reflect the needs of Oregon’s fire-adapted forests and forest-dependent communities.

Respectfully,  
George McKinley  
Executive Director  
Southern Oregon Forest Restoration Collaborative

**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 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 high-priority prescribed fire treatment areas) 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.

**Revision Rationale:**

The current SMP does not differentiate between the natural role of fire across the many forest types in Oregon. This revision is important because it helps underscore the unique ecological, economic, and social reasons for prescribed fire use in the dry forests (primarily southwest, central and eastern Oregon) and 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 provides an important scientific foundation to support the use of prescribed fire in fire-adapted forests as the most effective management tool to mitigate wildfire severity and effects.

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**REVISION RECOMMENDATION:**

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

**Revision Goal:**

The goal of this revision is to facilitate a meaningful increase in high-priority prescribed fire treatments by realigning Oregon’s definition of smoke incidents and intrusions to be consistent with federal Environmental Protection Agency’s 24-hour National Ambient Air Quality Standard (NAAQS) and tiered Air Quality Index (AQI), and by establishing a “minimize smoke intrusions” air quality objective. Along with additional metrics to better measure the extent and timing of short-duration prescribed fire smoke impacts, this revision would facilitate expanded burning opportunities while creating a mechanism to remain consistent with current and future science-based air quality policy.

**Revision Rationale:**

The current SMP utilizes a definition of smoke incidents and intrusions substantially reduces opportunities to implement high-priority prescribed fire treatments and reduce wildfire risk to critical ecological, economic, and social values. This revision would align Oregon’s definition of smoke incidents and intrusions to be consistent with EPA’s science-based 24-hour standards for public health concerns posed PM 2.5 emissions. 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.

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**REVISION RECOMMENDATION:**

Provide maximum flexibility and opportunity to implement prescribed fire in prioritized high-risk/high-value treatment areas

**Revision Goal:**

The goal of this revision is to provide maximum flexibility and opportunity to implement prescribed fire treatments within identified and prioritized areas of local forest landscapes where wildfire risk to critical ecological, economic, and social values warrants it. This includes allowances for increased smoke and intrusions/incidents in nearby SSRAs/communities at levels up to, but not exceeding, the federal 24-hour NAAQS threshold.

**Revision Rationale:**

There is a need to increase opportunities to implement prescribed fire in areas of overlapping ecological, economic, and social importance and high wildfire hazard. By maximizing opportunities to implement prescribed burning in these priority areas (identified through wildfire protection planning and prioritization efforts such as CWPP and QRA), this revision to the OR SMP will facilitate prescribed fire treatments in locations where wildfire risk to important values is greater than impacts of prescribed fire (including short-duration smoke exposure). In these high-priority prescribed fire treatment areas, maximum flexibility is warranted to increase the window of opportunity when prescribed fire can and should be used to safely and effectively mitigate wildfire risks over time.



**REVISION RECOMMENDATION:**

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

**Revision Goal:**

The goal of this revision is to address potential public health impacts of increased use prescribed fire and associated prescribed fire smoke by establishing new language and/or references within the Smoke Management Plan that outline a common strategy, resources, and protocols that support collaboration between fire managers and local, state, and regional public health organizations to protect communities, the public, and sensitive groups from short-duration exposure to 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 nearby communities or populated 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 like the *Oregon Wildfire Response Protocol for Severe Smoke Episodes*.