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Mr. Peter Daugherty
State Forester
Oregon Department of Forestry
2600 State Street
Salem, OR 97310

Mr. Richard Whitman
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Dear Mr. Daugherty and Mr. Whitman:

I am writing to urge the Oregon Department of Forestry and the Oregon Department of Environmental Quality to consider a more ecological approach to managing our forest landscapes, including the smoke emissions from such management.

After nearly a century of aggressively suppressing fires, many of our forest ecosystems are over stocked and in need of restoration. The Forest Service is focused on applying the best science to restoring our landscapes and creating resilient ecosystems. We believe to effectively reduce wildfire severity and effects, forest restoration must include a combination of timber harvest, thinning and prescribed fire. Mechanical thinning alone will not reduce the risk of wildfire as this leaves residual fuels on the ground. Thinning combined with prescribed fire is the most effective way to reduce risk from wildfire and restore resilient forests.

Additionally, we also want to provide clean air. The Forest Service prides ourselves that the National Forests are places where folks can go to experience clean and clear air. We understand that there are members of our communities who are sensitive or vulnerable to smoke which adds complexity to the management of fire. We do believe that to change the trajectory of increasingly severe wildfire and wildfire smoke in the future, we need to change Oregon's Smoke Management Plan to provide greater flexibility and opportunity to increase the use of prescribed fire.

We strongly believe that, together, we can meet the public health needs and increase the use of fire as we strive for resilient landscapes and communities. This can only be accomplished with the revisions to the state's smoke management plan to allow additional flexibility.

The smoke management plan should define smoke incidents and intrusions to be consistent with the federal Environmental Protection Agency's science-based thresholds for public health concerns from exposure. This should be used in the definition of smoke incidents and intrusions rather than arbitrarily-based thresholds currently in use. While we understand the need to err on being conservative when it comes to protecting human health, there are also very real and severe consequences of not restoring our forests, to include the loss of human lives, property, and weeks of unhealthy levels of smoke across the state.



The smoke management plan should reflect the essential need of prescribed fire to provide for resilient landscapes and communities. It should provide maximum flexibility to accomplish and use a science-based approach for establishing intrusion thresholds.

We need to continue to work together in order to find solutions in regards to the use of fire, as well as smoke management. The wildfires of the past several years have forced us to consider a potential new normal, one which none of us desire. Without a change in how we manage prescribed fire, and the associated smoke, we are facing increasingly severe wildfires and wildfire smoke.

Sincerely,



JAMES M. PEÑA
Regional Forester

cc: Craig Glazier, Dave Whitmer, John Giller, Mercury 239107