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Burn fee changes (biomass units, multiple burn types)	Changes in biomass usage over the next few years could impact revenue coming into the program. It is unclear whether biomass utilization will increase in the future or stay near the same as today. A consistent method of accounting for biomass utilization relative to fees is needed. Need a consistent definition of biomass. There are still some lingering issues with multiple burn types and fee assessment - see IT issues.	<p><u>7/24/12</u></p> <ul style="list-style-type: none"> • Two topics: Data tracking & biomass incentives • Operational and policy issues should be separated • Marcus Kauffman gave presentation on the current and near term future of biomass utilization in Oregon. • Analysis shows it's unlikely rates of forest residual utilization will increase in the near term and cause a subsequent decrease in revenue to the Oregon Smoke Management Program (OSMP) • Biomass utilization may be different depending on market conditions • Consider change to data system to deal with alternatives to burning • Registration & burn fee program should have flexibility regarding tracking biomass, maybe provide incentives for utilization vs. burning 	None – not needed	No need for fee changes related to biomass at this time.	Consensus Support

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Use of polyethylene on piles (more flexibility)	The use of polyethylene (PE) on piles under current rules is too restrictive, especially to federal landowners. The current rule prohibits greater than 4 mil thickness and greater than 10X10 ft sections (100 sq ft) of PE. However, multiple covers exceeding 100 sq ft are allowed if given written approval by the forester. There is a need to use larger, thicker pieces of PE for effective burning. There is benefit to reducing emissions from drier piles of woody material covered by the appropriate amount of PE.	<p><u>8/29/12</u></p> <p>Through two studies, it was determined that there was a benefit to emission reduction by using PE on piles to create a sufficient size dry spot for rapid ignition. During the last Plan review it was agreed that a piece of PE 4 mil in thickness and no larger than 10 foot by 10 foot sheet could be used. A written waiver could be obtained from the district forester to allow multiple layers of 10x10 sheets on larger piles. For some in the USFS, this was not sufficient because of shredding in high wind leaving no dry area. A dry pile burns cleaner whereas wet piles result in incomplete combustion and additional emissions. The request is for thicker PE and larger size sheets than 10x10.</p> <ul style="list-style-type: none"> • DEQ has major concerns about changing the rule at this time. • It's not just the Forest Service that has problems and added that it is one of the successes of the program. A larger piece would give more flexibility especially when burning near an SSRA. Also if piles are drier, it allows more flexibly with alternatives (e.g. biomass). • Landowners only use PE when it helps meet silvicultural goals and air quality objectives. Cost of adding PE is a limiting factor that can control how much is needed. • Cardboard, shingles, and oil coated paper have been alternatives used in the past. PE is by far the best where toxins are concerned. • The minimum 4 mil, 10x10 sheet has been tested for 5 years and may now need adjusting to improve combustion and overall burning. • The key is a larger, drier spot to preheat wet 	<ul style="list-style-type: none"> • “Up to 6 mil thickness not to exceed 200 square feet.” was suggested. • Committee of Mike W, Mike D., Merlyn H. and Jeff C. will gather information from landowners and develop a list of changes to the existing rule and a proposed new standard with rationale for the changes. Jeff C. is chair. Report due Oct 24, 2012. • Increase the greatest allowable thickness of PE in the Rule from 4 mil to not to exceed 6 mil as necessary. This will allow more effective covering of piles in many circumstances to better achieve the goal of rapid ignition, reduce emissions and increase burn opportunities for landowners. • Increase the maximum size of PE allowed to cover a 	<ul style="list-style-type: none"> • Leave the Rule as is. • Investigate the ability to do a study in the future. <p>A workgroup was formed to identify questions to be asked, and develop a set of questions that would lead to a study design by fuels scientists, potentially from Environmental Protection Agency (EPA) or Joint Fire Science Program (JFSP), to solicit support and funding.</p> <p>The workgroup will consist of Nick Yonker, coordinator; Mike Appling, Harold Merritt, Bob Palzer, Willie Begay, Craig Bienz, Janice Peterson and Rex Storm.</p>	Consensus Support

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		<p>areas and result in more complete combustion.</p> <ul style="list-style-type: none"> • A rule with square footage guidance and a carefully written exception was suggested. Manufacturers have different specifications with rolls produced in varying widths. • Leave it to the discretion of the forester to determine the minimum size of PE needed to achieve complete combustion of the fire. • Consensus appears to be a desire to use PE with a thickness of up to 6 mil and a size not to exceed a certain square footage would be the most effective. • In the future there may be places (WUIs and SPZs) where the use of PE may need to be eliminated and the focus should be on increasing alternatives. • Benefit to using PE. Emissions are no more harmful than burning woody material. • Four mil not thick enough – snagging branches and wind shreds it. • Would like more flexibility – use 6 mil PE and larger size in order to not have to burn off excess moisture. • The drier the pile, the more opportunities to use alternatives. • It's costly so landowner will only use it when necessary. • A 10X10 is not large enough for good combustion. It should be at the discretion of the burn boss. • Six mil thickness does not shred as readily. • Cardboard, shingles or oil coated paper are far more toxic. • 10X10 – frequently just burns a hole in the pile leaving it to smolder for a long time. • Adjusting after 5 years of using 4 mil 	<p>pile from 100 sq. ft. to not to exceed 400 sq. ft. per pile without approval. This will provide the landowners the opportunity to better achieve rapid ignition and lower emissions (both amount and duration). Minimize impact to SSRA's, increase burn opportunities, and reduce their risk of wildfire.</p> <ul style="list-style-type: none"> • Continue to require a written waiver to use more than the maximum (400 sq. ft. if approved), of PE per pile. The sub-committee believes the need for this type of waiver will be rare but it provides a control measure that will help prevent someone from using an excessive amount of PE to cover a pile unless necessary • Continue to explore and evaluate current data on the emissions/effects of 		

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		<p>10X10 pieces of PE to prevent smoldering piles is an appropriate adjustment.</p> <ul style="list-style-type: none"> • When burning close to an SSRA, ERTs are even more important and there may be a small window of opportunity. <p>10/24/12</p> <ul style="list-style-type: none"> • The group did not complete their review and had unintentionally left Merlyn out. They need one more meeting to complete their study and complete the report. • Good comments were received from requests. Input from federal agencies as well as industrial burners was also requested. Most people want more flexibility and those who do use it try to cover most of the pile. Federal and non-industrial use it for a specific purpose. Most want option to choose the appropriate size of PE – most prefer about 60% of the size of the pile. • With the diversity of piles, one size doesn't fit all. They need flexibility to meet the objective and would like to allow the size of the pile to dictate the need. • Concern was expressed over the general recognition of the benefit of using PE. PE is generally recognized as a prohibited material for agricultural and backyard burns. Prescribed forestry burning is the only burning where it is allowed. • The subcommittee was open to considering the use of 6 mil rather than 4 mil. Need some kind of study to evaluate the benefit comparing 4 mil and 6 mil on large and small piles, and dry piles vs. wet piles, etc. • Much of this is wintertime specific and there's more smoldering. Utilizing best burn 	<p>PE used on fuel reduction piles. If needed, establish partnerships to evaluate how the research could be conducted and how much it would cost. Until then rely on the research available to date.</p> <ul style="list-style-type: none"> • If SMAC members and advisors are interested, plan for a field trial using various thicknesses and sizes to determine the differences in meeting objectives (Fall 2013) to confirm or revise recommendations. • Leave the Rule and exception process as is until a pilot test has been completed. 		

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		<p>days could minimize the use of PE.</p> <ul style="list-style-type: none"> • Economics is a big issue for customers. Some burners would not be interested in thicker PE but may be interested in a larger sheet of PE. • For preparing NEPA documents, the 2003 study evaluated 10X10 square PE covers, at 4 mil thickness. If the rule were changed to allow larger or thicker covers, federal agencies would no longer be able to rely on the study for NEPA and new supporting documentation would be needed, such as conducting an actual field study. • The entire group should get together to consider two things: (1) Removal, and (2) pilot projects of some kind. • DEQ will try to find out what a pilot study would cost. • ODF has a copy of the 2009 study. • Studies have also been done on Klamath NF. <p><u>1/29/13</u> A sub-committee considered:</p> <ol style="list-style-type: none"> 1. Potential to lower emissions and timing. 2. Studies on combustion 3. Pressures against overuse 4. Research on emission reductions <p><u>4/1/13</u> A study is needed to support the agency's viewpoint.</p> <ul style="list-style-type: none"> • The Rule as written currently provides an exception process. With the potential of getting a study done we should leave the Rule as is. • Need education to landowners and districts, regarding the exception process for unique circumstances. Would like to propose a trial 			

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		<p>burn to collect data with one of the landowners.</p> <ul style="list-style-type: none"> • Develop a checklist for the exception process. • Provide an educational pamphlet. We should use the education tool as much as possible. It could be used for ERTs as well. • An information tool that provides options is a valuable tool. • The current rule calls for 10X10 sheets with the exception process allowing for multiple sheets of 4 mil PE. • The two agencies could probably agree on some pilot projects if a landowner was willing. It would provide information regarding what is needed from the research project. • It was agreed that with this committee nearing completion of its work, Willie Begay representing BLM would report back to this group in the short term or to the SMAC in the long term and try to have a research group at the next meeting for a presentation. • With the opportunity for a pilot test and collecting empirical data, the rule and exception process should stay as is. <p><u>5/23/13</u></p> <p>EPA was contacted about making a presentation to the Review Committee at the May 23rd meeting. However, they were unable to attend due to a federal furlough that day.</p> <p>They have a project using a mobile unit to measure agricultural burning emissions.</p>			

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		<ul style="list-style-type: none"> • ODF had been in contact with Brian Gullett, an EPA research scientist, who indicated they would be doing a field burning study near Spokane, WA in August. However that would not be a good time for a forestry PE study due to wildfire risk, and lack of personnel. A visit to the field burning study site was possible but a forestry PE study should be done at a later time frame (October – November). The cost of an independent study would run about \$85,000. • A question was raise whether federal agencies would want to get involved. The research should be applicable to many states. • It was noted that the USFS lab in Missoula could handle large burns indoors. • Also, the Joint Fire Science Program (JFSP) has a current study going and could be a source of funding. John Sissel is the contact and they are looking for opportunities. If criteria were developed JFSP could be a funding source. • Criteria included variations in thickness, ignition source and replicate studies. • A workgroup was recommended consisting of Nick Yonker, coordinator; Mike Appling, Harold Merritt, Bob Palzer, Willie Begay, Craig Bienz, Janice Peterson and Rex Storm. • The workgroup would develop questions to be asked and let the scientists write the design. 			
Class I Areas	Regional Haze Rule seeks to	1/29/13	5/23/13	RECOMMENDATIONS:	Strong

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(more protection)	improve the 20 percent worst days of visibility in Class I Areas year round, not just the summer protection period. Because it is a year round requirement, there may be a need for greater restrictions to burning near Class I Areas year round as opposed to just during the summer protection period (July 1-September 15). States must submit plans showing how Class I Areas will be protected and progress shown to improve visibility. They have been unable to show progress mostly due to wildfires.	<ul style="list-style-type: none"> • Visibility Objectives were adopted in 2007. Additionally, there is a year round voluntary effort to keep smoke plumes from causing ground level smoke impacts within Class I Areas. DEQ made a commitment in the Regional Haze Plan (RHP) to evaluate in 2013 the impact of prescribed burning in Class I Areas. That study was just completed and is available to the Committee for review. Recommendations from the study will be presented at the next meeting. Background on Regional Haze – • Class I Areas were identified by Congress in 1977 – any National Park and any Wilderness over five thousand acres. No additional Class I Areas have been identified since 1977. • The Regional Haze Rule (RHR) was adopted in 1999. • In 2018 states are supposed to do a comprehensive review of their entire plan. There may be substantial changes to the RHR. • In 2010 the focus was on industrial sources. • For the next 60 years the plan was to reduce haze from the largest contributing and controllable sources. • The five major pollutants causing haze include sulfates, nitrates, organic carbon and elemental carbon. • Why evaluate emissions from prescribed burning? It’s a significant emission source and contributor to haze. <ul style="list-style-type: none"> ○ Often occurs close to Class I Areas. ○ Monitoring data suggests it’s a significant contributor to the 20% worst days. ○ It’s possible smoke management protection 		Recommendations will include a rule change to remove summer protection language in the Rule, a directive change to prevent main plume impacts into Class I Areas and four recommendations that are part of the implementation plan – including (1) updating the Smoke Management brochure to include avoiding main plume impacts into Class I Areas, (2) Informing the Forest Practices Regional Advisory Committees at annual meetings on the importance of avoiding main plume impact into Class I Areas, (3) informing affected district and forest leadership of avoiding main plume impact into Class I Areas, and (4) developing a checklist for forecasting and burn	Agreement 10 pro, 1 con.

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		<p>could improve 20% worst days and provide significant visibility benefits.</p> <ul style="list-style-type: none"> ○ It's a commitment to the Oregon RHP for 2013. ● Looking at IMPROVE monitor data, organic and elemental carbon comprise about 50% of the pollutants, which is significant. ● IMPROVE monitors do not sample every day, but rather every 3rd day. ● IMPROVE data is a 24 hour average – no real time data. ● Transport winds vary – shift in time and elevation. This makes for a complex evaluation. ● Conclusions - The primary benefit was to provide a snapshot of Class I Areas more prone to prescribed burn impacts than others. <ul style="list-style-type: none"> ○ Two of nine Class I Areas studied had 50% of the impacts – Crater Lake National Park and the Kalmiopsis Wilderness Area. ○ Results suggest these areas would benefit from additional smoke management protection. ○ DEQ is seeking feedback on the draft report from ODF and the SMRC over the next three weeks. ● Wildfire was not included in the worst 20% days. There could be a scenario of impacts from prescribed burning being reduced in those two areas, yet wildfire smoke impacts increased in the Kalmiopsis and Crater Lake. After five years there is no change in the 20% worst days but wildfire is the greater factor in what contributes to the worst 20% days, while impacts from prescribed burning have gone down. What would that mean to future rule making as far as prescribed fire with 		<p>procedures for burning near Class I Areas to mitigate main plume impacts.</p> <p>Rule Changes: Class I Area Visibility Protection: 629-048-0130</p> <p>(3) When prescribed burning is conducted outside any Class I Area during the visibility protection period (July 1 to September 15), an objective of the Smoke Management Plan is to minimize any smoke that impairs visibility inside the Class I Area. <u>In addition to compliance with smoke management instructions issued in the daily forecast and compliance with all conditions of the burn permit required under ORS 477.515, burn bosses and field administrators are encouraged to closely observe local conditions at the burn</u></p>	

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		<p>ODF doing its part to reduce impacts while wildfire impacts take over?</p> <ul style="list-style-type: none"> ○ The focus of the RHR is on making <i>reasonable</i> progress in what is controllable. <p>4/1/13 Leadership from both DEQ and ODF had met regarding implementation of the RHP and protecting visibility in Class I areas during the 20 % worst visibility days. Three areas were identified.</p> <ul style="list-style-type: none"> ● <u>Education</u> – How do we make sure we are protecting Class I Areas? ● <u>Operational Guidance</u> – How to best protect Class I Areas - better forecasts, checklists, etc? What can be done internally? ● <u>Outreach</u> – to districts and burn bosses. Work with districts and landowners, monitoring, showing continual improvement. <p>DEQ explained the idea was to see what Smoke Management could do to minimize effects on the 20% worst days. Using test fires, waiting until later in the day to burn, and providing criteria to help minimize the effects of the burn would all would be considered. By 2018 all states will have to review the RHR and may have to look at prescribed burning. DEQ questioned whether reaching “natural conditions” in 60 years is an achievable goal and added that fire (wildfire) and its role is not considered in the RHR.</p> <ul style="list-style-type: none"> ● Changes to the DEQ report would include editing and incorporating 		<p><u>site to avoid the main smoke plume entering a Class I Area at ground level.</u></p> <p>(4) When prescribed burning is conducted inside a Class I Area, the Smoke Management Plan objective is to use best practices along with tight parameters for burn site conditions that will vent the main smoke plume up and out of the Class I Area and minimize residual smoke.</p> <p>(5) When prescribed burning is conducted outside the visibility protection period in proximity to, but outside and upwind of Class I Areas, in addition to compliance with smoke management instructions issued in the daily forecast and compliance with all conditions of the burn permit required under ORS 477.515, burn</p>	

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		<p>recommendations.</p> <ul style="list-style-type: none"> • The report should include a discussion section and incorporate wildfire, policies, regulations, and reduced budgets as a focus looking at 2018. Guidance should be in the forecasts to maximize opportunities. • How we share, communicate, educate, and bring about change without creating new rules? Learning networks could be the opportunity to share that information while working towards not imposing new rules. • Could develop a checklist and using test fires to monitor the situation in order to make a difference. • In the DEQ report 253 prescribed burns were identified over the six year period. Seventy one were possible smoke impact candidates and 39 were high probability impact candidates. Half of those units impacted the Kalmiopsis and Crater Lake Class I Areas. <ul style="list-style-type: none"> ○ When DEQ summarizes this to the Environmental Quality Commission (EQC) a summary of the comments received could be included. Many of those comments had to do with wildfire and how it affects the state's ability to show reasonable progress and set targets. • Not all wildfires are being suppressed. • The committee will think about what should be framed up for the SMAC under the headings of "Education", "Operational Guidance", and "Outreach", as well as how to capture pathways for comment and feedback into the 2018 Regional Haze Rule. <p>• <u>5/23/13</u></p> <ul style="list-style-type: none"> • The language "are encouraged" in OAR 629- 		<p>bosses and field administrators are encouraged to closely observe local conditions at the burn site to avoid the main smoke plume entering a Class I Area at ground level.</p> <p>(65) The Class I Areas in Oregon are include Crater Lake National Park, Diamond Peak Wilderness, Eagle Cap Wilderness, Gearhart Mountain Wilderness, Hells Canyon Wilderness, Kalmiopsis Wilderness, Mountain Lakes Wilderness, Mount Hood Wilderness, Mount Jefferson Wilderness, Mount Washington Wilderness, Strawberry Mountain Wilderness and Three Sisters Wilderness.</p>	

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		<p>048-0130 (3) is too soft - concerned that burn bosses and field administrators may interpret it as having a choice.</p> <ul style="list-style-type: none"> • The language came directly from OAR 629-048-0130 (5) of the existing rule. They are “voluntary” provisions. • The language is not referring to Smoke Sensitive Receptor Areas (SSRAs) but to Class I Areas. • The focus is on the main plume. • Concerned about the secondary impacts – not just the main plume. It should be more general. • Two issues were identified: <ul style="list-style-type: none"> • Moving the language from OAR 629-048-0130 (5) into the OAR 629-048-0130 (3), keeping in mind that (5) was added from the last periodic review. • Are these the right words for the Rule? • It was noted that all the changes together show the field how it should be implemented on the ground. • The object is to protect visibility in Class I Areas. We don’t really have a good means to determine the source allocation of smoke from a wide variety of potential sources. A unique chemical tracer is needed for source allocation for a wide variety of potential sources. There is no specific chemical “fingerprint” to distinguish silvicultural emissions from residential woodstove and other sources of combustion and industrial emissions after decades of searching for such indicators. 			

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		<ul style="list-style-type: none"> • The Class I Area changes are as follows: Bullet 1 – Rule change Bullet 2 – Updates to the Directive Bullet 3 – Outreach to districts, associations and landowners – Implementation Plan Bullet 4 – Education – Implementation Plan Bullet 5 – A checklist to screen burns that could have the potential to impact Class I Areas – Implementation Plan. • Conceptually, this would be the pathway used to contribute to reducing the 20% worst days. <ul style="list-style-type: none"> • Does the Regional Haze Rule (RHR) say anything about the main plume and is the Committee supposed to concentrate on improving visibility in National Parks and Class I wilderness areas with a mandate to making the worst days better. • The RHR is concerned with burns next to as well as 100 miles away from a Class I Area. Language about plumes came from ODF. In terms of voluntary measures, it's a good first step. • An objection was that a voluntary measure is not in the Rule. • Updating the Oregon Smoke Management Plan to conform to the RHR rule is an evolving process. The suggestion was not to carry over old language intended for other purposes to meet the RHR requirements. • This discussion was blending two issues and was directed only at the main plume 			

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		<p>and it is consistent. Most importantly it makes the Rule year round protection and provides guidance and education. The two are complimentary.</p> <ul style="list-style-type: none"> • Part of the objective is to provide for forest burning where necessary. • It was stressed that the objection to reducing smoke emissions to increase visibility by focusing on only the main plume would not accomplish this goal. • ODF and DEQ looked forward to the 2018 Regional Haze Plan revisions and noted that these steps would add another level to ODF's continuous improvement. • From a burner's perspective, the forecast and ODF district tell him what can be done. By the time a plume went into a Class I Area, it was too late. By going beyond the forecast, it was his problem and would lead to losing "social license" to burn. • The meteorology program sets the limits and asked how the program to protect Class I Areas could be tightened. • Ideas include using test burns or releasing balloons to verify wind direction, partial unit burns with the idea of minimizing smoke into Class I Areas, not eliminating it. It's a matter of balancing the two goals of Smoke Management - maximizing essential forest burning while minimizing intrusions, all the while improving the 20% worst days. Preventing the main plume entering a Class I Area is a huge step in that direction. • There's a list of ways to reduce 			

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		<p>intrusions at the end of the DEQ prescribed fire evaluation/study presented earlier to this Committee. These ideas should be considered being put in the Directive.</p> <ul style="list-style-type: none"> • A finer review by the forecasters should minimize impacts to Class I Areas. 			
<p>Alternatives/emission reduction techniques (define/tracking system)</p>	<p>Is there a need to define what's considered an alternative and do we need a system to track alternatives? Current Rule only gives a general overview of what an alternative practice is and the Directive encourages reporting alternative use but does not specifically require tracking. It is related to Regional Haze Rule and other states' programs. It could include what is not burned (i.e. biomass utilization) and the use of polyethylene - dry piles have fewer emissions.</p>	<p><u>7/24/12</u></p> <ul style="list-style-type: none"> • Where does this fit with smoke management: The Oregon Enhanced Smoke Management Program (ESMP) is Regional Haze Rule requirement. • Shows improvement in process and programs • How would tracking be implemented? • Federal agencies already have process (tracking on a form) - National Environmental Policy Act (NEPA) requirement • The federal form may be too complicated/a burden for landowners • There is clearly a need for the information and should be part of the registration process • Consider reporting acres and tonnage burned rather than just a check-box form • Voluntary/mandatory for tracking purposes • Reports could be shared with other agencies/entities • Alternatives to burning were built into the ESMP and the state implementation plan (SIP). • Alternatives do not mean the same thing as emission reduction. • Elements 1 and 3 of the ESMP would be met if alternatives were tracked. <p><u>12/4/12</u></p>	<ul style="list-style-type: none"> • Subcommittee will craft a recommendation for this group under the premise that there is data available that needs to be evaluated to determine if there are any gaps and the data is sufficient. • ODF staff will determine what would have been reported if the full annual report had been continued. • ODF collaborates with DEQ to determine what steps are necessary to adequately track alternatives and ERTs 	<ol style="list-style-type: none"> 1. A potential rule change with minor wording changes and identification of new reference materials for land managers. 2. The development of a workgroup (yet to be identified) to look at long and short term ERT improvements based on data needs. 3. Analyze existing ERT data as part of the Implementation Plan. 4. Collect ERT and alternative to burning data from landowners and land managers through an annual survey of 	<p>Consensus support</p>

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		<p>A subcommittee was charged with exploring an alternative tracking system to use and monitor alternatives to burning and emission reduction techniques (ERTs).</p> <ul style="list-style-type: none"> • The subcommittee essentially questioned: <ol style="list-style-type: none"> 1. Whether the information is already collected in the system 2. Impact on landowners – additional work potential with undefined benefits 3. Would market and biomass utilization tracking be better done through staff resources in partnership with resource planning? • The subcommittee determined the subject needed to be turned over to the full Review Committee to answer the following questions <ul style="list-style-type: none"> ○ Lack of defined benefits makes one ask -Is it worth it? Do we need the additional information? The subcommittee fully supports the idea of having additional information but questions the method of gathering it and whether other sources have been fully examined. • DEQ brought the opportunity before the Committee. It was understood that alternatives to burning were built into the ESMP and the SIP. The Committee needs to better understand it before determining how much of a problem needs to be solved by the Smoke Management program. What’s the value that DEQ sees under the Clean Air Act in relationship with EPA to the SIP? • It came back to the full Committee to understand what the driver was behind the request. • How would it be used? Would it be purely 		<p>land management activities – part of the Implementation Plan.</p> <ol style="list-style-type: none"> 5. Development of a base line list to identify ERTs. – Implementation Plan. 6. Report available ERT and alternative data in the Smoke Management Annual Report – in existing Rule. <p>Rule Changes: 629-048-0200 Alternatives to Burning:</p> <p>(1) When planning forest management prescriptions and particularly final harvests (prior to reforestation), owners are strongly encouraged to use practices that will eliminate or significantly reduce the volume of prescribed burning</p>	

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		<p>for the benefit of DEQ in helping justify support for the program? Would it somehow benefit the landowner? Alternatives to burning suggests that it's for doing something other than burning but the funding structure for the program is for those that do burn. Is it outside the purview/responsibility of ODF staff? There's value to it but is there a way to satisfy DEQ's need by looking at program tonnage over time or coordinating with the Biomass Coordinator's contacts?</p> <ul style="list-style-type: none"> • Is there opportunity for a beta test? There is insufficient information to dedicate resources for a beta test. The idea of a beta test was dropped. • The subcommittee provided a crosswalk of new definitions of ERTs and alternatives with existing definitions in smoke management. • Alternatives do not mean the same as ERTs. • DEQ responded to the subcommittee's need for more information via email and noted that elements 1 and 3 of the ESMP would be satisfied if alternatives were tracked. The information would be compiled and summarized in DEQ's Regional Haze progress reports required every 5 years. DEQ needs a method to document that ESMPs are being implemented. He noted that other states that track alternatives and ERTs actually estimate the emission reductions as part of their reasonable progress demonstration on how they are improving visibility in their Class I areas. • There are data points that are not currently collected. We would need another data collection tool. What do we get out of an 		<p>necessary to meet their management objectives. Some practices to consider include, but are not limited to:</p> <p>(3) <u>Prior to registration, forestland managers are strongly encouraged to consult the following publications on the use of alternatives are recommended reading for forestland managers who frequently engage in prescribed burning:</u></p> <p>(a) "Non-burning Alternatives to Prescribed Fire on wild lands in the Western United States" (Western Regional Air Partnership, February, 2004); and</p> <p><u>(b) The Oregon Forest Industry Directory website provides information on potential markets for woody material at</u></p>	

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		<p>ESMP?</p> <ul style="list-style-type: none"> • Alternatives avert emissions. • DEQ’s presence was needed to provide more information about the ESMP. • The advantage of an ESMP allows for a violation to be removed from your record. • It was proposed to table this issue until the next meeting when DEQ could be present to address ESMP questions. • The Regional Haze Rule is an EPA rule and is just as powerful as the National Ambient Air Quality Standard (NAAQS) rule. The RHR is year round while the Oregon rule is only for the summer months. • Need to provide DEQ with a list of questions to answer. • Questions for DEQ: <ul style="list-style-type: none"> ○ What is the distinction between alternatives to burning and emission reduction techniques? Can they really be separated? ○ What is the value of the ESMP and what does it take to meet it? ○ What is the ESMP? How do we support it? Why? ○ What can we do outside the SMP to track alternatives? ○ Do the RHR and the SIP apply year round? ○ Are the elements a framework or prescriptive? ○ What do we need to do to continue our ESMP? ○ Are we a certified SMP? <p><u>1/29/13</u> The ESMP goes back to the origin of the RHR which came out of the 1977 Clean Air Act</p>		<p>www.orforestdirector.com/stories; and</p> <p>(c) “Oregon Forest Biomass Supply Estimate by County” by Philip S. Cook and Jay O’Laughlin (Western Governor’s Association, January 24, 2011), on the Woody Biomass Utilization Database at Oregon Department of Energy’s website: www.oregon.gov/energy/RENEW/Biomass/Pages/Bioenergy_map.aspx</p> <p>(b) “Annual Emission Goals for Fire Policy” (Western Regional Air Partnership, April, 2003).</p> <p>(4) As described in 629-048-0450(2)(c), the department shall publish an annual report summarizing the use of alternatives to burning.</p>	

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		<p>Amendments from Congress. It has a goal to prevent any future and remedy any existing visibility impairment in Class I Areas. There are nine elements that make up the ESMP. These nine criteria are specifically required in two parts of Section 309 of the RHR. The RHR came out in 1999 and all states were required to implement it. The Western Regional Air Partnership (WRAP) was tasked with developing guidance documents on how states could implement the RHR. They came out with a guidance document in 2002 that provided more specificity to what goes into an ESMP. As a result, in 2010, DEQ took the elements of the ESMP from the WRAP guidance and included them in the Regional Haze Plan (RHP). Language in the in the RHP states that the Oregon ESMP basically meets those nine criteria, except in three areas: First, actions to minimize emissions. While this is currently being done, there is no formal tracking of emission reduction techniques. Second, evaluation of smoke dispersion. While this is being done voluntarily for Class I areas to avoid major smoke impacts, it is not required. Third, alternatives to burning. Again, while some use of alternatives does occur, there is no formal tracking to verify this.</p> <p>The nine elements of the ESMP are in the ODF Administrative Rule (OAR 629-048-0130) which was adopted in 2007 and came out of the last Review. The Committee may need to discuss the tracking (alternatives and ERTs) piece. It seems all the other elements are already met. There are two topics to discuss – (1) Are the nine elements being met? (2) The ESMP, by rule, is all about protecting Class I Areas.</p>			

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		<ul style="list-style-type: none"> • Subparagraph (3) of ODF’s Administrative Rule does not appear to be in alignment with EPA. The ODF Administrative Rule specifically deals with the period of July 1 through September 15. That differs from the EPA requirement which requires year-round protection. This is inconsistent. <ul style="list-style-type: none"> ○ (3) It was put in the rules in 2007 and DEQ did not adopt the RHP until 2010. The original visibility plan was adopted in 1986, and had a summertime only focus of July 1 – September 15, which is what (3) reflects. This can now be removed from ODF rules. • How do the Committee’s recommendations become part of the RHP. DEQ’s RHP was adopted in 2010 and the original visibility rule should have been rescinded at that time. Visibility is now a year-round focus. • The nine elements are currently addressed in rule. How it’s implemented is the question. • Subsection (5) of the Rule does seem to provide for additional protection for Class I areas year round. • Is there a mechanism in place to insure that we are in compliance. • Seems appropriate to give higher priority to certain seasons like summer visitations while it also is appropriate to protect against smoke intrusions in the November – February period for air quality health reasons. • Very little burning is done in the summer by ODF. • The Forest Service burn season ends when fire season begins. • What does an ESMP do for the landowner. <ul style="list-style-type: none"> ○ There has been an ongoing emphasis on 			

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		<p>promoting alternatives, which encourages emission reductions in the process. Noting that it's good for public relations to be able to show that it's not all being burned.</p> <ul style="list-style-type: none"> • The inconsistency between the 2010 RHR and the ODF's administrative rule should be resolved and some of OAR 629-048-0130 should be deleted and replaced with appropriate language. Then focus on how to meet the goals of the nine elements of the ESMP. <ul style="list-style-type: none"> ○ The intent of each of the elements have been met with the exception of tracking ERTs and alternatives. • For Class I Area Protection and RHR we really need to address whether the current ODF administrative rule needs any adjustments or changes that need to be recommended to address any inconsistencies. Second, for the alternatives/ERTs topic is there something in tracking to strengthen that program? • ODF and DEQ will meet regarding how the Rule should be revised with respect to the 2010 RHR and develop proposed new language. <p><u>4/1/13</u> There is data in the Smoke Management data system that can be captured. Data from landowners is also needed. It needs to be put back into the annual report.</p> <ul style="list-style-type: none"> • What gets registered annually and what gets accomplished? The difference is ultimately alternatives use. • Need to determine what's available, what do we need to collect, what is collectable, etc. 			

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		<p>and how do we portray it.</p> <ul style="list-style-type: none"> • Need to make incremental steps as we move forward. Don't see any major rule changes. It's collecting what we have and reporting on it. • How do we collect biomass data? Are there pieces of that data we could use? • When the fee structure was changed we needed to educate people in order to prevent misrepresentation. Is the gap intended to be ERTs? How about intrusions per number of burns as part of annual report. • In a web based system the reason for not burning could be tracked – landowner would be able to enter it. • Biomass tracking/utilization would be valuable to collect for both the biomass group and Smoke Management. • A survey could be done by the districts. • Would need to include where biomass utilization markets are located – they are not equally distributed throughout the state. • Federal agencies don't have an option to do biomass unless it's addressed in the NEPA. Generally, when they register a unit, the intention is to burn it. • Need to get a better sense of what we are collecting now and identify gaps, determine if a policy decision must be made, and determine a funding source. <p><u>5/23/13</u></p> <ul style="list-style-type: none"> • How soon would the workgroup be identified and suggested a biomass specialist from their Regional Office. • The workgroup would be put together after 			

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		<p>the work of the SMRC is completed.</p> <ul style="list-style-type: none"> • It was suggested to include some of the work being done by the social sciences at OSU and U of O. It could help determine what level our constituents would support. • In terms of new networking, it's evolving and should be listed as OAR 629-048-0200 (3)(d). Land managers are managing a resource that pushes social buttons. • Preferred to leave the social networking part to the workgroup. • OAR 629-048-0200 (3) is targeted at land managers. • It was questioned whether inclusion of websites into the official rule was advisable since they may change over time. • The work group would pull out pieces that may not belong in Rule and could be maintained and kept current as links on the ODF website. • It should be left to the workgroup to determine what the right players were at the table. The communication aspect is good and references to any rule revision should direct the viewer to the ODF website for the most current information maintained by the ODF Smoke Management program. <p>Marcus Kauffman presented a proposal for gathering data for enhanced smoke management data collection to be done by an outside contractor. Handouts were provided. Also, comments from Committee members to the proposal were also included.</p>			

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		<ul style="list-style-type: none"> • Comments were sent back to Marcus regarding why the biomass group doesn't know how much is out in the forest. The need for the data exists but should those who burn pay to collect data on what's not burned? • It appears the proposal is very focused on biomass utilization with little on ERTs. • It was explained that this proposal is a conversation starter with the recognition the need is broader than biomass. Some of the comments received back included broadening the scope of the proposal. • This work fits under ODF-DEQ recommendation 4 and it is envisioned getting this information from district queries to landowners and the Biomass Resource Specialist (for biomass). This was starting from the ground up and building from there. There's no need for an outside contractor as the data should be readily available from districts and landowners. The workgroup could perhaps develop the questions that will need to be asked of the landowners. • Dave Cramsey was credited for putting definitions together. Gathering new data rather than looking at existing data does not necessarily make for better decision making. This is market driven and therefore you're always looking back to see if progress is being made. A baseline assessment is needed in order to move forward. • Marcus would pursue gathering new biomass data as led by the workgroup, utilizing existing personnel and resources. 			

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		<ul style="list-style-type: none"> It was noted that it's not possible to track the use of polyethylene on piles in the existing system. Also, one the largest alternatives are leaving the piles unburned or scattered – this is also an alternative activity so how is that tracked? ERT data collected will not be tied to specific landowners. Recommendations/ bullets should be analyzed and developed by convening a diverse workgroup and present to the SMAC. 			
<p>Periodic Review (Rule and Directive/ timeline)</p>	<p>Periodic Review language is found in the Directive and only currently applies to the Directive. It states a Review will occur every five years. The previous Directive stated the entire Plan would be reviewed every five years. The question is whether this language should be in the Rule rather than the Directive and whether the entire Plan should be reviewed as has been always in the past. An additional question would be whether a specific timeframe is necessary or whether the Review time period could be flexible. It needs frequency, scope and an adaption mechanism.</p>	<p><u>7/24/12</u></p> <ul style="list-style-type: none"> Department of Environmental Quality (DEQ) would like to see 5 year review as it has been Tie together with Regional Haze Plan review The last review was longer than 5 years; Advocate for a progressive look at issues as they come up thus the review should be periodic rather than 5 year unless there are negative impacts There is the need for flexibility for program to act quickly on issues Concrete schedule shows highest level of commitment, but build in flexibility <p><u>8/29/12</u> No quorum present</p> <ul style="list-style-type: none"> Goal is to keep it in alignment with the SIP Minor verbiage changes were discussed. Requirement for 5 - 10 years leads to public perspective that it is being reviewed on a regular scheduled basis 	<ul style="list-style-type: none"> Keep language in the Directive, but in Rule it would be periodic based on DEQ & ODF joint decision and need 5-year Review unless jointly agreed by DEQ & ODF to be extended Option to change Directive back to reflecting that the entire Plan would be reviewed Option to change Rule (through rulemaking process) to accomplish same 	<ul style="list-style-type: none"> The new Rule will be written as OAR 629-048-0450(5): “The Department of Forestry and the Department of Environmental Quality will jointly review the Smoke Management Plan (ORS 477.013, 477.515-.562, OAR 629-048, Directive 1-4-601) every five years unless there is agreement by both agencies that the Plan can be reviewed at an earlier or later date, not to exceed 10 years from the previous review. 	<ul style="list-style-type: none"> Consensus Support

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		<p><u>10/24/12</u></p> <ul style="list-style-type: none"> • The final draft could look different when finalized. • Why no consideration for an interval of less than 5 years. <ul style="list-style-type: none"> ○ Because the Advisory Committee meets annually and could make adjustments as necessary. • It gives flexibility and implies that it could be reviewed in less than five years. • It could be “reviewed at a later date or on a different schedule, not to exceed 10 years” was suggested. • It was then suggested it “be reviewed at an earlier or later date not to exceed 10 years from the previous review”. • It’s currently in the Directive. But does it belong in Rule or Directive? • From a process stand point this group is making a recommendation that needs to go to the SMAC, then up to the two agencies, to the Environmental Quality Commission (EQC) and the Board of Forestry (BOF). There are a significant number of people who want to see something in Directive or Rule that captures the need for a periodic review of the Smoke Management Plan and allows the agencies to determine where the recommendation best fits. • A Rule has more enforceability than a Directive. • It was suggested that further decision be “parked” until all the Rule and Directive changes have been determined and could be done at the same time. • Ultimately it would need to pass legal approval in determining if it belongs in 		<p>Results of the review will be presented to the State Forester and the Director of Environmental Quality for joint consideration and approval. Representatives of affected agencies may assist the review at the discretion of the State Forester.”</p>	

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<p>Process to designate new Smoke sensitive Receptor Areas (SSRAs) – (simplify)</p>	<p>The criteria for listing new SSRAs are over two and a half pages in the Rule. Can this be reduced and simplified?</p>	<p><u>7/24/12</u></p> <ul style="list-style-type: none"> • DEQ provided handout current Rule requirements of SSRA designation process for Committee discussion. • Rule is complicated and bureaucratic especially for local governments, thus they may not request special smoke protection • Limiting as the process relies heavily on monitoring equipment which may not be available. • Impacts to tourism, local economy, impacts on air quality, visibility, and health issues • Too discretionary regarding frequency, intensity and duration of impacts. ODF/Board of Forestry (BOF) can deny request • DEQ should be more involved in the process - inconsistent with DEQ joint approval authority in statute. • Suggest streamlining process • Based on the approval of more SSRAs (recent trend since 2007), process may not be as cumbersome as thought • Designated SSRAs are permanent, means less burning, means more buildup of fuels, and could lead to more catastrophic wildfires. • If not based on monitored events, what system is better? • Have there been incidents where there has been too much or not enough discretion? • City of Florence complaints led to ban on burning in and around the area. Requested SSRA rejected • SSRA may not be designated, but the Florence area is still protected • SSRA is the highest level of protection 	<ul style="list-style-type: none"> • As part of SMP periodic review process, decide collaboratively between agencies (DEQ and ODF) any SSRA requests. • DEQ makes determination on community needing SSRA designation. Propose to ODF with evidence then forward to seek BOF approval. • Impacted communities verified by DEQ monitoring data would be sufficient for automatic approval of SSRA • Community formally requests SSRA as part of review. DEQ and ODF evaluates request and decide whether to bring to Review Committee • Not just part of five year Review, but as requested • Review Committee is presented with and evaluates 	<ul style="list-style-type: none"> • Voted to dismiss. Issue may be discussed later by the Smoke Management Advisory Committee (SMAC). 	<ul style="list-style-type: none"> • Low priority- dismiss at this time. May discuss in SMAC. majority support - 8 • Medium priority- have later discussion - minority support - 4

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		<ul style="list-style-type: none"> By raising level of awareness, there has been improvement, especially for Florence. 	<p>potential new SSRAs, then provides recommendations in the usual manner. If DEQ and ODF disagree then the Review Committee would make recommendation.</p> <ul style="list-style-type: none"> New SSRAs would be added to the SMP as other changes, following completion of periodic review, contingent upon BOF and EQC approval Wildfire management practices that contribute to community being impacted could qualify as SSRA Where DEQ and ODF disagree, seek recommendation from EQC (DEQ) and BOF (ODF), then present reciprocally for approval. 		
Compliance and enforcement (clearer	How does ODF determine compliance and what can ODF legally do if somebody is not	<u>8/29/12</u> DEQ provided a handout of the ODF's enforcement Rule OAR 629-048-0500. In	<ul style="list-style-type: none"> Add OAR 629-670 to paragraph 1 of OAR 629-048-0500. 	No substantive change needed in OAR 629-048-0500	Consensus support

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guidelines)	<p>complying? Does something need to be added to the Rule in enforcement? ODF can cite for up to \$5000. Rule is currently vague on when and how enforcement actions will be taken by ODF on different agencies.</p>	<p>section 4 of the Rule, portions were underlined where DEQ had questions.</p> <ul style="list-style-type: none"> • DEQ has raised this as a topic because the underlined language is vague and clarification is needed. • Is a Facilitated Learning Analysis (FLA) considered standard practice, and if so, should it be reflected in the Rule? • It is the “corrective action” noted in the Rule to avoid any further enforcement action being taken? • What about ODF’s inability to take action against the federal agencies. • ODF provided the following responses to the listed DEQ questions: <ol style="list-style-type: none"> 1. What does timely correction of any breakdowns mean? <ul style="list-style-type: none"> ○ It means what’s reasonable and prudent. 2. Under what circumstances does ODF anticipate no further action would be taken? <ul style="list-style-type: none"> ○ Like anything these rules actually fit underneath the Forest Practices program in ORS 527. ORS 527 gives ODF the ability to cite private, federal, or other landowners. OAR 629-670 lays out civil penalties. Within those rules, there are three legs of a triangle: enforcement, education, and engineering, positively affecting change. Each circumstance is different. There are few cases with a clear violation. Last time someone was cited was 15 years ago via smoke management rules. 3. Can the Rule be more specific on what type 	<ul style="list-style-type: none"> • ODF to develop one page flowchart tying enforcement through statute to administrative rules. 	<p>other than adding a reference to OAR 629-670 that details enforcement formulas for any violation of forest practices. DEQ satisfied with existing rule.</p>	

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		<p>of report needs to be submitted to the State Forester? Would this in most cases be a FLA?</p> <ul style="list-style-type: none"> ○ It's the educational tool to make sure it doesn't happen again. It's part of the three legged triangle – education, engineering and enforcement. <p>4. What criteria or guidance will the State Forester use in deciding what warrants enforcement action?</p> <ul style="list-style-type: none"> ○ A clear violation of the Rule. <p>5. What type of documentation is expected here?</p> <p>DEQ added that if this was their enforcement rules, it would specify a time frame for investigation of the incident, the kind of documentation to be provided, and probably indicate when a warning letter would be issued instead of actual enforcement action. DEQ added that the SMP is part of the SIP, which makes it federally enforceable. This is a mandatory smoke management program. Enforcement rules must have some teeth to them. DEQ suggested that they do not seem to be as currently written. If the enforcement authority lies in Forest Practices or elsewhere that you can fine up to \$5,000, there should be a cross reference at a minimum. As the Rule reads now, it does not.</p> <ul style="list-style-type: none"> • There are administrative rules which outline how assessments and/or fines would be levied that tie back to Forest Practices. ODF referred to OAR 629-670 which lays out the process for damages and assessments via civil penalties, and there are about five pages that apply. • ODF suggested that OAR 629-670 be put in the enforcement section which also includes 			

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		<p>ORS 477 and ORS 527, which lays out the ability to cite or provide a written statement of unsatisfactory condition. These are the two enforcement actions that OAR 629-670 provides for.</p> <ul style="list-style-type: none"> • Since that’s the type of clarification they are already doing, it would keep the references current. • DEQ asked what the concern would be of adding this clarification to the Rule. <ul style="list-style-type: none"> ○ It would not add validity to the Rule. ○ The Rule points to the mechanism for enforcement – the Forest Practices Rule. ○ It points to the avenue and the vehicle to do that. ODF also noted that there is an entire section in Forest Practices on smoke management, including education. It starts on page 87. Copies will be provided to Committee members. <p><u>10/24/12</u></p> <ul style="list-style-type: none"> • There was a brief discussion of the Smoke Management enforcement rules flowchart • DEQ had asked their legal counsel if the SMP violations are subject to DEQ enforcement and civil penalties. There is currently no reference to violations of the ODF Smoke Management Plan in DEQ’s rules. Waiting for legal counsel’s response. • DEQ would like to see clarification of sections (4) and (2a & 2b) of the enforcement rule. • ODF does have the ability to take action against federal or private entities under the Forest Practices Act – civil penalties. • Three legs of compliance– enforcement, education (could be an FLA), and 			

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		engineering. • Enforcement found in: OAR 629-670 and ORS 477 – should this be added to the first paragraph of Enforcement Rule? • Do the rules go far enough? • Because it's part of the SIP when should DEQ take enforcement action and can they? • How successful would a citation be? • What legal issues would be involved? • DEQ would like to see \$ amount of fines in enforcement rules. • Does DEQ have an avenue of enforcement action?			

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Require Monitoring of smoke from large burns	Large units should be monitored to determine if potential impacts could occur. The word “monitor” does not necessarily need to be defined and could be left to the judgment of the burn boss.	<p><u>8/29/12</u> The idea was to provide for monitoring, especially large burns.</p> <ul style="list-style-type: none"> • California requires large burns (250 acres and greater) to file monitoring plans and monitor downwind to verify that smoke was not getting into a smoke sensitive area. • No plan to define monitoring because there were so many types of monitoring. The specifics are in the Smoke Management Directive – it talks about different kinds of monitoring. • The question is: “Is there enough in the Directive or Rule regarding monitoring to ensure SSRAs could determine the source of smoke?” Does the Committee think there is room for improvement? • The monitoring portion is doing well. It could have a few adjustments but that would be all it needed. • The districts usually monitor the burns. • The recommendation is to bring back some minor word changes at the next meeting. <p><u>10/24/12</u></p> <ul style="list-style-type: none"> • Monitoring currently exists (in the Directive). • The point is we are dealing with large tonnages for large burns and DEQ suggested adding monitoring. Adding monitoring into the Rule was not an issue. • It appears to deal more with agency burns looking at the tonnage over multiple days. Don’t see a lot of burns on private or industrial property going for multiple days. • These large tonnage fires are done by the federal agencies and they are forced to monitor by their guidance. Using the 	<ul style="list-style-type: none"> • Make minor wording changes in OAR 629-048-0230 to add monitoring. 	<p>Changes to OAR 629-048-0230 (3) relating to large tonnage units were unanimously approved and will be written as: Prescribed burn operations with large tonnages (2000 tons or more) or burns that will occur over multiple days should be adequately planned and monitored to provide opportunities to cease lighting and hold the existing burn within smaller compartments to mitigate undesirable smoke effects or changes in the actual burn conditions from those that were forecasted.</p>	Consensus Support

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		<p>extended forecast they try to work with the meteorologists to pick the best week for multiple day burns. They plan a break point in case the fire must be extinguished.</p> <ul style="list-style-type: none"> • It was the time to make sure the monitoring goes into Rule as well as the Directive, not that it isn't already being done but to capture it there rather than just in Directive. • BLM/Medford already monitors on a regular basis from start to finish. They collectively monitor when another agency is burning in the same air shed. 			

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Submitting Planned Burns (move back deadline)	Frequently burners make last minute requests on the day of the burn due to weather changes. The districts often work with the landowner and enter in units the day of the burn. Previous smoke management plans had the cut off time at 10 a.m. the day of the burn. The current deadline is not workable - look at moving it back.	<p><u>7/24/12</u></p> <ul style="list-style-type: none"> • Burn plans submitted by 5:00 pm not realistic • Need more flexibility to allow burn plans up to 10:00 am on the day of burn, with latitude for additional planning later the same day. • Needs a deadline, but could be waived/extended. <p><u>8/29/12</u></p> <ul style="list-style-type: none"> • Staff was asked to review existing language and make revisions to the deadline. 	<p>Remove from Rule and insert in agency Directive.</p> <p>Move back deadline to day of the burn.</p>	<p><u>Extend the burn plan deadline to read:</u></p> <ul style="list-style-type: none"> • Rule (629-048-0230 (4)): For prescription burn units on forestland subject to level 1 regulation, burn bosses must provide specific information to be transmitted to the smoke management forecast unit in a standard format acceptable to the forester, regarding unit location, method of burning, and fuel loading tonnages by 10:00 a.m. the day of the burn. If additional burning is deemed possible after 10:00 a.m. in consultation with the forecast unit, the plan deadline may be extended. • Directive (1-4-1-601 (D1)): In areas of level 1 regulation, units must be registered for burning seven days prior to 	Consensus Support

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				burning (OAR 629-048-0300), planned in the data system the day of the burn (OAR 629-048-0234(4)), and accomplishments reported the first business day following the actual burn (OAR 629-048-0320) and each additional day that burning is conducted in the unit.	
Audit Program (end)	This program was implemented in the 1980s because districts were blamed for fudging tonnages on units to get more burning done. This problem has mainly gone away since there is much less competition for the air shed due to less burning. The program has turned into nothing more than a paperwork exercise with little value and evaluates such a small percentage of units to not even influence behavior. DEQ has not commented or asked how the audit program is ensuring compliance on correct unit tonnages. Do we still need it? Evaluate the benefits in terms of training and social license.	<p><u>8/29/12</u></p> <ul style="list-style-type: none"> • Audit program in place since 1987 and under direction of fuels specialist for many years. • Issues that resulted in development of audit program have been resolved – the program is no longer needed. Pressure to get so much burning done has diminished. • Now more difficult to get an audit done. And there appear to be few problems today. Do we still need the program? • Should maintain audits of pre-burn tonnage. • Limitation of time and people to get the audits done. • A field coordinator responsibility • Audits measure accuracy • Maintains credibility over the long term. • Maintains compliance. • Limited staff and funding – need to invest where it makes the most sense. • Already have built in mechanism for compliance. Checks and balances. 	<ul style="list-style-type: none"> • Maintain pre-burn audits but remove burn day audits. Staff will develop proposed new language. • Keep program as is. 	Audit program will remain as is with improved support from federal partners.	Consensus Support

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		<ul style="list-style-type: none"> • The audit program just checks that what’s being reported is accurate. <p><u>10/24/12</u></p> <ul style="list-style-type: none"> • During the last meeting the Committee discussed this and decided to focus on the pre-burn audit, but with no quorum present, postponed further discussion to include federal agencies. The audit program discussion also includes a training element. • DEQ advised focusing on post-burn, not pre-burn registration. • The issue is consistency. It has the biggest impact on compliance. • Audits are important because they help verify compliance. That’s how they serve a role as a check and balance. • There are two issues: <ul style="list-style-type: none"> ○ 1. Is tonnage reporting consistent and accurate? ○ The post burn audit: Is this a burn day? How did the burn go? • Were there any bad situations – hold over smoke, etc? Investigation could lead to findings. • How many burn day audits are done. Do we have the resources to do them? • Audits have been done in the past by neighboring districts/forests doing the audits for each other. But the goal of 1% (.5% pre-burn and .5% post-burn audits) is not being met. • The federal agencies have the requirement that both pre and post burn audits be done. • If the Department has not been doing this for a number of years , is it needed. <ul style="list-style-type: none"> ○ Audits have been done but we’re not 			

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		<p>reaching the 1% goal. It could be done if we had a fuels specialist. A fuels specialist would go from district to district to ensure audits are completed.</p> <ul style="list-style-type: none"> • The federal agencies may be doing their audits internally but they don't use ODF forms or report to ODF. • The data is there, we just need to make sure it's getting reported to ODF. • The work is being done but there's a disconnect getting it reported; perhaps it should be sent on to SMAC. • It's on the table to end the audit program because of input received over the years. There is nothing to show that the audit program has changed behavior, or changed anything about how the burn process is working. Why have a program that's not really doing anything when essentially we have other ways to ensure compliance - intrusions, monitoring, etc. We have intrusions because people are not complying with the instructions. Is this necessary in the long term. It's done its work in the initial phase. The pressure to get burns done has largely gone away. • As an advocate for the program, DEQ needs tools to show that compliance is being achieved. One method could be proven by the number of intrusions per number of burns annually over time to show that there is no backsliding, just continuous improvement. • There are always going to be intrusions due to changes in weather that cannot be predicted. • There is merit to a subgroup to look at this Directive change and where individual 			

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		<p>partners are at. They would bring findings and conclusions that could lead to a recommendation.</p> <ul style="list-style-type: none"> • The notices go to specific individuals and ODF often hear nothing back from both federal and non-federal agencies. • Understand that feds are not reporting but have data and asked about the others that fail to respond. Is it a capacity problem? • Is it a lack of manpower or short notice of the burn making it difficult to get someone to do the audit. 			
<p>Special Protection Zones (SPZ) – (remove/alter)</p>	<p>This Directive item has been in place since the 1991 Review. The rules are rather confusing with multiple scenarios. The most noted is that no burning is allowed in an SPZ from Dec. 1 through Feb. 15 when the meteorologist has been notified of a "Red Day" by a local woodstove curtailment program. The expectation was the district would notify the meteorologist (this was prior to usage of the internet). These SPZs are large blocks of space that don't make sense meteorologically or topographically. They also restrict the meteorologist's ability to scientifically and operationally determine whether the burning could take place in these locations. Further, no district ever contacted the meteorologist until this past winter. There were</p>	<p><u>7/24/12</u></p> <ul style="list-style-type: none"> • Since SPZs are in the State Implementation Plan (SIP) EPA may enforce a no "backsliding" rule. • Took away ability for meteorologists to make decision on burning in certain conditions • Over the years, burning practices have changed...more burning opportunities in winter • SPZs have been in place for the past 20 years, there were violations on "Red Days" as the information was not being communicated to the meteorologists. • Where does SPZ fit into non-attainment? • The SPZ "boxes" (areas) should be defined meteorologically and topographically if they are not removed. • Particulate matter from industrial sources used to be the main problem vs. woodstove emissions. • Since SPZs have been in place for 20 years, are they still effective for what we are trying to accomplish. • Main issue is compliance with woodstove 	<ul style="list-style-type: none"> • Committee of Bob Palzer, Mike Dykzeul, Brian Finneran, Gregory McClarren, Merlyn Hought, Travis Medema and Nick Yonker will meet following meeting of the agency reps. • Need better idea of what new SPZ areas would look like. • DEQ was asked to provide copies of citations from the Clean Air Act or guidance documents for clarification of "No back sliding". <p>SPZs and ERTs both need additional discussion regarding</p>	<p>Recommendations for updating the Special Protection Zones were as follows:</p> <ol style="list-style-type: none"> 1. Housekeeping for clarification in Directive. 2. Remove the SPZ around LaGrande as there is no longer an issue. 3. More discussion is needed around the Medford SPZ. There needs to be more outreach and public hearings to ensure that they will continue to be 	<p>Consensus support</p>

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	<p>probably numerous times a "Red Day" was called and prescribed burning was taking place without incident. It's known that there are good windows of opportunity to burn during this timeframe when there may be a "Red Day" for woodstoves. Usually, this occurs under a high pressure ridge when the air mass is stable but skies are clear and drying allows for winter burning at higher elevation where the air mass may not be as stable and winds may be carrying the smoke away from the populated area. Thus, it appears the program is really not necessary and the meteorologist can use his judgment whether burning can be allowed under varying atmospheric stability at all times throughout the year. With increasing EPA standards this may be considered "backsliding".</p>	<p>programs when "Red" days are issued during winter months.</p> <p>8/29/12</p> <ul style="list-style-type: none"> • There is a desire to further explore the topic: What's in it? What does it mean? Does the language make sense? • Consider doing away with boundaries once the area is in attainment and continued maintenance or goals have been met. • What are the boundaries? Should the boundaries better align with meteorological facets, local conditions, what's in the local area, topography? Should forestland be considered? <p>10/24/12</p> <ul style="list-style-type: none"> • DEQ provided "redline strike-out" handout to clarify 20-year-old language. The verbiage was shortened and made more understandable. • Should SPZs no longer exist? The thought was they were to become SSRAs after the last review. • On page 43 of the final report (of the previous review). "Eliminate source terminology" SSRAs get at the receptor rather than the source and are stated to be the highest level of protection. • Is the issue on the table to get rid of SPZs. If they are not eliminated, can they be revised? Does the Committee want to talk about getting rid of SPZs? Some of the discussion items that are in here are: Changing the boundaries to make them more reflective of topographical breaks, or considering burning on "Red" days. 	<p>Red, Yellow and Green Days as they relate to the existing and proposed SPZ boundaries.</p>	<p>protected at the highest level.</p> <p>There was unanimous approval to send the recommendations back to ODF and DEQ to complete their discussion and make recommendation to the SMAC after allowing SMRC to first review and make comment.</p>	

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		<ul style="list-style-type: none"> • Using Medford as an example, DEQ had determined that particulate matter levels were too high. DEQ would like to keep SPZs in place but tailor them to current needs – make them more consistent with open burn bans and woodstove curtailment programs and add Air Stagnation Advisory (ASA) days. It’s difficult to get compliance when people see significant burning occurring. On both “Red” and “Yellow” days, no woodstoves are allowed to operate unless they are certified woodstoves emitting at zero opacity except for a half hour start up and shut down. Industrial sources were required to defer those types of activities that didn’t have to be done every day. Discretionary activities that would increase emissions were not to be done on “Red” and “Yellow days.” That is still in effect. DEQ would like to see no forestry burning on ASA days. • DEQ noted that there are currently five SPZs (Medford, LaGrande, Lakeview, Klamath Falls and Oakridge). Of these five, Klamath Falls and Oakridge currently have PM 2.5 attainment plans developed that are about to be adopted. These SPZs cannot be changed without going back and changing these plans. Brian noted that the SPZs have worked well. It provides more intensive management in these areas. Another thing it provides is an equity issue – it’s not effective when the public sees burning in the hills and thus creates difficulties for local compliance. • Medford BLM was unaware of the SPZ requirement in the Medford area until last winter. The desire is to see SPZs be removed and follow the meteorologists’ burn forecast, 			

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		<p>even during the winter months. DEQ in Medford doesn't put the woodstove advisory out until 0800 and that's too late to put burn crews together.</p> <ul style="list-style-type: none"> • Concerned about negative consequences if these protective measures are ended. The science is there to support increased stringency of the standards to protect public health. • At the previous SMRC Review, a recommendation was made which would do away with the SPZs; this committee should determine if there is a need to move forward or not. • *Determine options – Do we need to move forward with 2007 Review recommendation or go forward with the current recommendation. • Concept to move forward and try to describe the boundaries legally. • The original proposal was removal of SPZs – appears that the SPZ proposal is not to remove it but rather revise it. • A subcommittee group was proposed to get together and make a recommendation to both agencies. ODF and DEQ will meet and discuss first. <p>4/1/13 SPZs need additional discussion (Red Days, Green Days, Yellow Days and boundaries) to complete any recommendations and ODF and DEQ will come back to the next meeting with the key principles identified.</p>			

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		<p><u>5/23/13</u></p> <ul style="list-style-type: none"> • ODF and DEQ need to meet once more to determine where they are not in 100% alignment. • ODF and DEQ had agreed to a new terrain-based boundary around Medford and that basically on a Red Day, if you could see Medford from the burn site, then there should be no burning during the non-attainment period. Now need to work on Green and Yellow days. • The Air Quality Maintenance Area (AQMA) applies to the city that has violated the air quality standards and is loosely drawn about 15 miles around the city. Medford did attain compliance and is now in a maintenance area. • It was asked if the AQMA was similar to an SSRA boundary. The AQMA boundary is the SSRA boundary. The new proposed boundary was somewhat larger than the SSRA boundary. • There was concern that it's difficult to relax a standard and then go back to where you were earlier when more stringent comprehensive emissions control strategies were in place. That's why maintenance plans for prior non-attainment areas include a "no backsliding" component. Medford has the highest propensity for late fall and winter air stagnation. In Jackson County no outdoor open burning is allowed from Nov. 1 through the end of February every year. There is a disconnect when prescribed burning is allowed while residential woodstove and burn barrel use 			

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		<p>and all other individual outdoor open burning is prohibited. Shouldn't everyone play by the same rules?</p> <ul style="list-style-type: none"> This issue was precisely why these discussions were continuing. Can a current SSRA do the job? The two agencies will continue to work and take a proposal to SMAC when ready. It was also suggested the SMRC review before going to the SMAC. 			
Complaint Procedures (review/simplify)	<p>The complaint process may be asking more of the districts than necessary. A question is whether a smoke incident report is the same as the complaint form? The complaint form should be the only document that needs filling out unless there's an intrusion. The Directive requires the district to give the complainant an expected time for an ODF response. It would probably be better to leave this off or change to say "as soon as possible." The Directive states the district should call back all complainants with results of investigation. This may be too burdensome with numerous complaints. It would probably be better to call back only complainants that request a call back. Could be 'cleaned up' and made less burdensome.</p>	<p>10/24/12 The Directive was explained along with recommended changes. The intent is to clarify and strike out unnecessary language. The district should be able to go to the form, fill it out and would have essentially everything needed to satisfy this Directive.</p> <ul style="list-style-type: none"> This is a good example of what Directive or Guidance language should be all about. Need to include an obligation that the complainant be provided with the option to receive feedback but don't obligate the district to provide investigation results unless asked for. Simply adding a box to check to mark "follow-up requested". This would require contact information. By including the box, it will show that it's being done. Include language: "inform the complainant that they have the ability to receive follow up." It could be a public education tool. 	<ul style="list-style-type: none"> New bold face entry on complaint form – "Response requested." Include language "inform complainant that they have the ability to receive follow-up". General clean-up of language. Return calls to those who request investigation results only. Add a check box to mark for "follow up requested". 	<p>Directive 1-4-1-601 Standards to be changed to read:</p> <ol style="list-style-type: none"> c. Maintain a written record containing at least: the nature of the complaint, names of those involved in the investigation, findings, and action taken. This record shall be kept on file for two years. Copies shall be sent to the area office and the Salem Smoke Management Unit. d. Inform the complainant of the opportunity to receive follow up of investigation findings. <p>2. Initial Contact: When a complaint</p>	Consensus Support

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				<p>is received, the person receiving the complaint should use the Smoke Complaint Report form found in Appendix 2, page 8 of this Directive to record the name(s) of the complainant, the description of the complaint, and where the problem is located. If the complaint is received in Salem or by a district other than the one with geographic responsibility, it shall be referred immediately by the person taking the complaint to the proper district</p> <p>3. Follow-up: After the investigation is completed, and with the approval of the District Forester on the findings and any necessary follow-up action, complainants who requested investigation</p>	

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				information should be contacted and informed of the findings and follow-up action. 4. A check box and new language will be added to the complaint form: "Inform the complainant that they have the ability to receive follow up."	
5-Year Budget (create/update)	Need to verify expected expenses from historical trends and determine potential revenue changes from federal and private burning, biomass or other alternative activity. Should group make recommendations to SMAC? Evaluate whether other recommendations have a budget impact.	A projected five year budget for the Smoke Management program was provided for the purpose of determining the ability to fund the Field Coordinator position – it is estimated that the position will cost about \$100,000 per year.	N/A	N/A	N/A
Field Coordinator (hire part-time/full-time)	Need to present duties of Field coordinator, determine if districts or forests really need one and how they would use this position. Also need to determine whether we have a budget for the position and if there are enough duties for a part-time or full-time position. We have lived without the position for 17 years; is there a strong need/desire for this position? Dependent on other issues.	<u>12/4/12</u> <ul style="list-style-type: none"> • It was recommended five years ago not to implement and there are other priority items in greater need of the funds. • Need to have a robust conversation about it and maybe hire a field coordinator for a one to two year trial. • Some associations and districts may have more time to do auditing and training. • What would it gain the landowner in terms of burn opportunities? • It seems to fit back into the air quality component and asked if it was worth going 	Potential one to two year trial. Don't fill the position.	Don't fill the position.	Consensus support

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		<p>back to DEQ – but not with the existing budget.</p> <ul style="list-style-type: none"> • Defer any decision on this position until closer to the end of the Review. Meanwhile considering re-writing the position description was suggested. • Joint funding was suggested. • The Committee has a fiduciary responsibility to monitor the fund balance. • There is a spectrum of opportunities and it should be kept on the table for the future. • The position would cost about \$100,000 per year. • ODF has been without the position since 1995. <p>4/1/13 ODF provided a handout of the Smoke Management fund balance from 2009 to the present adding that with the amount of prescribed burning staying about the same, he sees little change in the fund balance in the near future. He noted that it would be difficult to sustain the Field Coordinator position on the current budget.</p> <ul style="list-style-type: none"> • Responses from district and federal agencies showed the position was not generally needed. • What would the person do? What’s the goal of the position? With all these variables could the position be justified at this time? 			
<p>Managing burning on poor/marginal days (more clarity/guideline)</p>	<p>Need to demonstrate how instruction model works and how the instruction varies based on mixing height, transport wind, proximity to SSRA, spacing, and</p>	<p>12/4/12</p> <ul style="list-style-type: none"> • The matrix does an excellent job and works well. • It will be emailed to the committee. • The topographical map is a new tool that 	<p>Copies of the Information/Guidance the ODF meteorologists use to write the burn</p>	<p>The goal to address the question has been met.</p>	<p>Consensus Support</p>

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needed)	tonnage. Rule vs. guidance Issue? Should there be a 'bottom line' - no burning threshold or is it adequate? Is it related to SPZ issue? Public perception of burning on poor air quality days.	helps mitigate risk.	instructions were provided and how the information was used was explained.		
IT Issues related to the Smoke Management data system	Need to work on issues of the Smoke Management data system to improve the billings and reduce paperwork as it relates to the burn fee issue.	<p><u>7/24/12</u></p> <ul style="list-style-type: none"> • There is a successful relationship between the federal data system (FASTRAX) & the ODF data system. • Currently landowner, district, and Salem work together if there are invoice discrepancies. • There are issues around the current system and how burn fees are collected. • Focus should be on fine tuning burn fee system, cost and type of burning. • System in place to track different types of burning, becomes difficult unless one person does all, could easily mischarge. • System should be able to handle landing/piles etc., find out why not working. • Difficult for non-industrial owners to get into offices; would be great to have something online. • Landowners/operators can't see what has been input - leads to misinterpretation. <p><u>12/4/12</u></p> <p>The subcommittee came up with short and long term solutions. One issue was dealing with fee system changes. With increased whole tree yarding bringing material to landings, the entire unit is charged \$.50/acre for landings and an additional \$2.60/acre for subsequent "other acres". Since there could be two types of other acres on the same unit, the system needed to be</p>	<p>IT needs to evaluate/understand what the issues are, identify potential solutions, work to implement.</p> <p>Establish subcommittee (Jeff Classen, Mike Dykzeul, Mike White, Lee Miller, and Nick Yonker) of this group to take lead in working with IT and Cindy Smith to track and identify issues in the data collection system and bring specific recommendations (including biomass tracking, which may be a policy issue) back to this group at a future meeting.</p> <ul style="list-style-type: none"> • Three options to consider – <ul style="list-style-type: none"> ○ Get on the "train" (with Private Forests). ○ Create a new 	<p>Recommendation:</p> <ul style="list-style-type: none"> • Change OAR 629-048-0300(3b) to read: <i>If subsequent to burning only landing acres or right-of-way piles, the first time fire is applied to any other portion of a registered unit (typically broadcast or in-unit pile burning), an additional burn fee of \$2.60 per acre [for each additional treatment registered] shall be required.</i> • Invoices changes: In the invoice reports under the heading of "Acres", change the acres recorded from "unit acres" to the number of acres for which fees are assessed by specific treatment. • Smoke data screen changes: 	Consensus Support

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		<p>able to handle that as well. Landowners wanted to be charged only for the types of burns they had accomplished. ODF provided copies of proposed language changes for committee members.</p> <ul style="list-style-type: none"> • Is there was a way to add a block for “acres diverted” to the data entry page? <p>Another IT issue was the invoice – the invoice needs to reflect the actual acres burned for each burn type.</p> <ul style="list-style-type: none"> • The subcommittee recommended the following changes: In the invoice reports under the heading of “Acres” change the acres recorded from “unit acres” to the number of acres for which fees are assessed by specific treatment. <p>The subcommittee’s recommendation for tracking alternatives within the smoke management data system is “no.” It was explained that the data system is for prescribed burning and fees associated with prescribed burning. It is not a system for tracking alternatives and would require considerable revising. An alternative tracking system, if necessary, should be kept separate.</p> <p>Some landowners would like the ability to check the accuracy of data input before invoices are mailed each month. This would be a long-term solution which would take one to two years to complete at a cost of about \$100,000. IT would need to take over the program and it would require extra money for them to take it on.</p> <p><u>4/1/13</u> Discussion of the data system moving to an online system continued.</p>	<p>system.</p> <ul style="list-style-type: none"> ○ Allow user entry with approval from the local District 	<p>Within the “registration” section, change the “fuel Loading” heading to read “Treatment Summary”. Change the “Other Acres/Pile Tons” to “Pile Acres/Tons”. Insert a new field and textbox labeled “Broadcast Acres”. Reprogram the system to allow for the ability to charge separately for landing piles, pile acres and broadcast acres burned.</p> <p>The Committee unanimously agreed they should continue the current path between Smoke Management and Private Forest staff of building the Smoke Management System into FERNS as opportunities arise.</p>	

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		<ul style="list-style-type: none"> • Now is the cheapest time to get into a web-based program by tying onto the Private Forests new notification program (FERNS). • As part of the Enhanced Smoke Management Plan – need to integrate all of our needs at this time. • Designing a checklist that would collect biomass utilization data (tons and acres) was proposed. This could be done with an annual survey. • There is a forest biomass working group that should be able to provide lots of information. • Determine what’s out there and what is needed. • Is there was a role for the (Smoke Management data) system to gather additional data (alternatives). <ul style="list-style-type: none"> ○ It was reiterated that the Smoke Management data system was not designed for tracking alternatives. • Prefer it not be tied to the Smoke Management system. • There is a whole range of alternatives. • There are also many ERTs out there. • ODF reminded the Committee that an online system with read-only access for landowners and IT support was being considered. A more robust system is supported by IT. Adding alternatives and ERTs would be a separate process. • Would we even be able to hook onto the Private Forests FERNS program – yes was the response. • Three options to consider – <ul style="list-style-type: none"> ○ Get on the “train” (with Private Forests). ○ Create a new system. ○ Allow user entry with approval from the 			

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		<p>local District</p> <ul style="list-style-type: none"> • Staff will work on a putting something together to gather alternatives to burning, what the system currently gathers and what it could gather. • Federal agencies did not have alternatives to burning to put in. <p><u>5/23/13</u></p> <p>Lena Tucker, Deputy Chief, Private Forests Division gave presentation of the new forest activity tracking system.</p> <ul style="list-style-type: none"> • The SMRC would like to integrate the Smoke Management System into the Forest Electronic Activity Reporting and Notification System (FERNS). • Lena explained that one of their goals was to develop a web-based portal for users to enter their notifications. 2012 was used to gather information of user needs for the system. These were called user stories. They recently accepted a bid from the Timmons Group in Virginia. They have experience building a similar system and have developed software applications for other natural resource agencies. • Deliverables include an electronic interface to allow user entry of notifications – similar to an on-line account for each user, including integrated GIS, as well as ability to drawing simple shapes, a way to notify landowner when a notification is inspected/approved, mobile capacity, and reporting capabilities. 			

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		<ul style="list-style-type: none"> • Currently FERNS is in the planning phase, reviewing the user stories (the “I want” list), categorizing, providing clarification, checking for completeness, setting time frames, etc. It is expected to be in the test phase by the end of July. One of the positive elements about the Timmons Group is that they use the “Agile process” (as each piece or component is completed it can be rolled out and tested). • She stressed that FERNS is driven by notification so everything has to have a notification number. Review teams are in place, both internal and external, and will test the product as it rolls out every two weeks. • Lena sees the future for Smoke Management fitting into the system. Smoke Management would have to do their homework – develop user stories (what each user wants from the system), what should the portal look like, and what reporting functions are needed. Lena is hoping for a launch date of March or April 2014. • It was clarified the launch date would be for the Notification System, not the Smoke Management System. • The fields between the two systems are not the same (i.e. lat and long vs. township/range). During the second phase a closer look will need to be done so all the integrations work properly. • The system is funded through Private Forests and there is no funding for Smoke Management and would require funding 			

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		<p>from Smoke Management.</p> <ul style="list-style-type: none"> • Lena emphasized the best thing Smoke Management can do in the interim is to be very specific about wants and needs (user stories). Timmons does attach a dollar amount for each little piece which assists with decision making. • Mike D – said he was really pleased – even if program development could just anticipate SMP data capacity inclusion would be great. • Lena proposed that she would lend her business analyst, Joe Touchstone, to lead the process and capture all the user stories relating to SMP. Timing of everything would need discussion. • The Committee unanimously agreed they should continue the current path between Smoke Management and Private Forest staff of building the Smoke Management System into FERNS as opportunities arise. • It was asked if going to the Virginia Dept of Agriculture website could be helpful. • Lena responded that The Timmons Group is building a system called SMART for the USFS to track stewardship programs. She suggested that just going to the Timmons website would be very valuable. As many of their projects can be seen there. • Lena will be the liaison for the Fire Program. 			
Timelines for registrations and notifications between Smoke	Currently there are two different timelines for Smoke Management registrations and Forest Practices notifications. Smoke	<p>8/29/12</p> <ul style="list-style-type: none"> • Would an educational piece bridge the gap? • Discuss with two Division Chiefs • Involve IT to consider moving to a web- 	<ul style="list-style-type: none"> • Tabled at this time • Not an actionable item. 	Tabled. To be sent on to SMAC for consideration.	Consensus support

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Management and Forest Practices.	Management has a three calendar year re-registration deadline to allow for time to get needed burning done. Forest Practices has a one year notification used to assist counties to determine yearly revenue. Can these two different timelines be reconciled to reduce confusion and paperwork at the district and landowner level?	<p>based program.</p> <p><u>12/4/12</u> ODF Protection had discussions with Private Forests. Private Forests has already released a Request for Proposal (RFP) for a web-based notification system and they're was not comfortable changing the RFP at this time, but is open for discussion with the vendor once selected, to change the scope of the agreement. There are two different pathways, a web-based pathway and a policy choice because there are rules that govern the Notification system and the Smoke Management system. It can't happen immediately, but there is a window for future conversations.</p> <p>Discussion:</p> <ul style="list-style-type: none"> • Is there the ability to carry the same Notification number throughout the duration of burn permit when harvest notification has expired? • There are challenges coming from one district noting that it probably needs to be solved by Private Forests. Will keep working on the policy issue of the one year Notification and three year Registration issue. • If the SMAC thinks it's a good way to go and we have the funds, it could happen without priority for Forestry Business Initiative funds. • Private Forests has no planned changes and good reason for not making changes. • Smoke Management is not readily open to change either. • Is there an educational piece that would 			

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		bridge the gap? <ul style="list-style-type: none"> • It probably needs to be solved on the Private Forests side. • Keep working on the policy issue of the one year notification and three year registration issue. • If SMAC wants to fund it, it could happen without FBII funds. 			
Opportunities for educating and communicating the Smoke Management program to the public and interested stakeholders	There should be new strategies for utilizing education and communication to demonstrate the importance and use of the Smoke Management program.	<u>8/29/12</u> Quite a lot of educating the public regarding smoke management has taken place since the last Review. Public and landowner brochures have been developed are available online and at district offices. Each season a public service announcement is distributed for radio stations throughout the larger burning areas. They are short spots that let people know why we do burning. <ul style="list-style-type: none"> • This topic should be the last issue discussed – collect ideas and then determine how to best utilize education tools and dollars. • The subject was tabled for future discussion at the end. 	Collect ideas and save as a last item in Review. Tabled – to be addressed in SMAC meetings.	Tabled. To be sent on to SMAC for consideration.	Consensus support
Training to bring consistency to rating fuel loading on the ground for prescribed burning.	There should be training required for districts and landowners to assist with consistency in the rating fuel loading of slash prior to burning a unit.	<ul style="list-style-type: none"> • Link to the audits – educational component. 	<ul style="list-style-type: none"> • Attach to audit issue and to education and training. Tabled – to be addressed in SMAC meetings.	Tabled. To be sent on to SMAC for consideration.	Consensus support
Regulation of burning outside of ODF's district boundaries	The Smoke Management Plan only regulates burning within forest protection districts. How do we handle prescribed burning outside of ODF protection boundaries or other types of	No discussion	Resolve between ODF and DEQ.	Taken out of SMRC Review and to be resolved between ODF and DEQ.	N/A

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	burning such as agricultural and land use change?				
Terminology - Prescribed fire vs. wildfire for resource benefit	How do we define between prescribed fire vs. wildfire for resource benefit?	No discussion	Unresolved – tabled for SMAC to consider	Tabled. To be sent on to SMAC for consideration.	Consensus support