



Smoke Management and Prescribed Burning

Comment by Rex Storm, Associated Oregon Loggers, Inc.
before the Oregon Board of Forestry – November 2, 2016

Chair Imeson and Board members, my name is Rex Storm, Certified Forester and Forest Policy Manager for Associated Oregon Loggers (AOL). I make these comments on behalf of the 1,000+ AOL member companies, representing Oregon logging and allied forest management businesses—many who conduct burning operations, treat forest fuels, and own forestlands. Your consideration of the continued effective use of forestry burning as an important management tool is of critical concern to our business of growing and harvesting Oregon trees.

We support the Department's 2017 comprehensive review of the forestry smoke management and prescribed burning programs. Furthermore, AOL urges that this review be completed by a broad representation of forest sector cooperators—inclusive of forest contract operators.

We do burning. Forest contractors have a vested interest in the sound use of prescribed fire as an important management tool across all forestland ownerships—across time & space. Contractors prepare forest fuels for burning, they are often directly engaged in burning, plus they conduct the many related activities. Burning is an operation for which AOL-member forest contractors are daily engaged at implementing those practices and regulations surrounding the effective use of fire.

Cooperation for success. Contracted relationships and cooperation are an integral component of our profession, upon which effective burning relies. Many AOL members own family forestlands, and we also have a unique relationship with other small forest landowners and their family forests. Our members work for all ownership and purchaser categories, and in all regions, which affords a unique perspective toward the effective use of fire across Oregon's entire forest landscape.

Well managed smoke. The Department's smoke management program has a decades-long history of successful forestry burning that achieves high marks at fostering efficient prescribed burning of forest fuels, while protecting air quality. ODF's smoke program adeptly facilitates private and public lands forest burning to achieve compliance of airshed standards—as an agent for Oregon DEQ and US EPA. ODF effectively prevents intrusions in designated Smoke Sensitive Receptor Areas(SSRA).

Burning is an essential professional tool. Prescribed fire is one of our important tools that forestry professionals prescribe to help grow and harvest trees successfully. Burning in managed forestlands has many scientifically-proven benefits. In conjunction with harvesting operations, burning is effective to prepare for reforestation success, diminish competing vegetation, and reduce hazardous fire fuels. And, the skillful use of prescribed fire naturally emulates ecosystem functions for enhanced habitat, species diversity, and site productivity. Today's managed private forest landscape illustrates how prescribed fire has benefited diverse ecosystems and prevented unacceptable wildfire fuel hazards. Burning is a win-win for the environment and the trees alike.

Adapting to current situations. Together, the forest community must cooperate to modernize the burning and smoke management programs—assuring that burning practices and regulation maintain contemporary technology. While prescribed burning is a proven & effective tool, the issues surrounding fire use are escalating year-by-year. Who would have thought that Smokey Bear would become a controversial icon in forestry? Advancing into the future, opportunities to use fire may be increasingly challenged by threats, against which together we must thoughtfully address.

Maintain burning as an option. It is becoming tougher to burn excess forest fuels—from both harvest and restoration. Legal sufficiency for prescribed forest burning should be a viable option for Oregon Forest Practices Act-regulated harvest operations. In recent years, further restrictions on burning have limited use of this important tool, due to factors including: narrow smoke forecasts, limited tonnage approval, numerous SSRAs, short burning seasons, restricted pile covering, competing burn projects, and forest operations outside ODF protection boundaries. Alternatives to burning excess forest fuels often are rare, infeasible, or punitive.

Restoration burning intentions. Federal forestland managers increasingly propose underburning of unharvested forests as a “restoration” treatment, which intends to reduce fire hazards and improve forest health resiliency. Today, forest fuels come in two colors: a) harvest treatment slash; and b) underburning for restoration purposes. These landscape-scale restoration burn projects cover thousands of acres and burn a greater tonnage of fuels. Prescribed restoration burns are an added smoke program volume, which are straining the current smoke management paradigm and capacity.

Non-regulatory first. Forest landowners and operators today work cooperatively with Department foresters to grow and harvest forests under high standards of stewardship. This is the “Oregon Way.” Future smoke management and burning programs should be built on the strengths of this existing cooperative stewardship culture. This “stewardship” favors voluntary practices and education, first—and then lastly, applies regulation where effective stewardship is not achieving resource objectives.

I make the above recommendations in respect for the Board’s decades-long commitment to Oregon’s burning and forest practices programs, which evolved in the spirit of cooperative stewardship with the Board’s advisory committees and forest cooperators. An effective regulated smoke and burning program can be assured where sound practices are willingly employed by Oregon’s forest cooperators.

Thank you for considering our suggestions toward the Department’s 2017 comprehensive review of the forestry smoke management and prescribed burning programs. I look forward to participating in this review, to be completed by a broad representation of forest sector cooperators.