

# BOF Action Item Smoke Management Review

*Draft Agency Recommendations for updates to the  
Oregon Smoke Management Plan*

*June 6, 2018*

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Environmental  
Quality  
Commission



Board of  
Forestry



# Smoke Management Plan



*The SMP addresses two legislative directives (ORS 477.552):*

## **Public Safety/Forest Health**

- To improve the management of prescribed burning as a forest management and protection practice; and

## **Public Health Protection**

- To minimize emissions from prescribed burning consistent with the air quality objectives of the federal Clean Air Act and the State of Oregon Clean Air Act Implementation Plan developed by the Department of Environmental Quality.

*SMP Approval and Continuous Improvement:*

## **Smoke Management Plan Review**

- Occurs every five years. Smoke Management Review Committee is established jointly between DEQ and ODF to improve the implementation of the Smoke Management Plan.



# Smoke Management Plan



## *Roles and Responsibilities*

### **Board of Forestry**

- Review and approve Smoke Management Plan (SMP)
- Rule promulgation authority

### **ODF**

- Administers SMP
- Management and enforcement of program

### **Environmental Quality Commission**

- Review and approve SMP
- Approve State Implementation Plan (SIP)

### **DEQ**

- Monitoring of air quality
- Partners with ODF to develop SMP
- Participates in the Smoke Management Advisory Committee (SMAC)
- Develops and submits SIP



Environmental Quality Commission

# Smoke Management Plan

Authorized by Environmental Quality Commission and Board of Forestry



Board of Forestry

## State Smoke Management Policy

"No smoke intrusion into SSRA (populated area)"

No Intrusions

Intrusions

7 Intrusions per 3000 Ignitions (10yr avg)

## National Ambient Air Quality Standard PM2.5

No NAAQS Exceedance

NAAQS Exceedance



# Policy Decision Space



12,790 Tons Emissions

21,430 Tons Emissions (estimated)

162,000 Acres Burned

271,000 Registered Acres (planned to burn)

Prescribed Fire 10 Year Averages

# Policy Tradeoffs

496,000 Acres Burned in Oregon (10 year average)

Reduce Wildfire Potential and Emissions

Vulnerable Population Health Risk

NAAQS Exceedance Potential



# Smoke Management Plan Review Committee



## **Goal of Smoke Management Plan Review:**

- The Committee's primary focus was to review the SMP and ensure implementation is balanced in achieving our two legislative directives (ORS 477.552)
  - Five meetings from May 2017 to March 2018
  - Roster - includes membership of SMAC
  - <http://www.oregon.gov/ODF/Board/Pages/SmokeReviewCommittee.aspx>





## Overview of Key Recommendations from Agency Committees



- Update definition of “smoke intrusion” and “smoke incident”, as discussed.
- SMP objectives language adjusted to “minimize smoke emissions and avoid intrusions” as opposed to “prevent smoke from entering SSRAs and no intrusions”. Seeks a greater balance on the achieving legislative directives.
- Establishes standards for Communications Plans to increase public outreach and awareness, and evolve communication strategies when smoke incidents or intrusions occur.
- Allow expanded use of polyethylene covers as an emission reduction technique.
- Added language on “necessity of safeguarding public health” consistent with existing language on “necessity of prescribed burning”
- Carried existing language on Special Protection Zones from program directives into rule to emphasize the importance of protecting communities that have had air quality exceedances.



# Rulemaking Next Steps



## **ODF Process**

- Present rule language and seek permission of Board of Forestry to hold public hearings on proposed rule (June 2018)
- Public hearings and comment period concurrent with DEQ (summer 2018)
- Seek rule approval from Board of Forestry (target September 2018)
- Enroll new rule with Secretary of State/ rule implementation (target fall 2018)

## **DEQ Process**

- Information item to Environmental Quality Commission (May 2018 - completed)
- Public rulemaking process concurrent with ODF's process. Public hearings and public comment period (summer 2018)
- Joint agency recommendation for SIP approval to EQC (target September 2018)
- Submit changes to EPA for SIP approval (target September 2018)