



June 6, 2018

La Grande Board of Forestry Meeting

RE: Public Testimony Regarding Smoke Management Program's Proposed Rule Making

Dear Board of Forestry Members:

Thank you for the opportunity to provide public testimony regarding ODF's rule making process. As you move forward with this effort, I encourage you and EQC to seriously reevaluate the merit of using the 1-hour threshold to define smoke intrusions. I say this for three reasons.

First, the majority of Smoke Management Review Committee members did not support using the 1-hour threshold to define smoke intrusions.

Second, the proposed 1-hour threshold was included based on the *unsubstantiated* belief that the 24-hour NAAQS does not adequately protect human health; the *mistaken* belief that prescribed fire smoke and wildfire smoke are qualitatively similar and impact human health the same way; and the *mistaken* belief that implementing mechanical treatments and prescribed fire at larger scales fails to mitigate wildfire behavior and smoke. I appreciate that public policy decisions frequently go beyond what science might say about a matter. However, I also know that it's irresponsible to ignore credible, relevant science when one is formulating public policy. Unfortunately, that happened when the decision was made to use the 1-hour threshold to define smoke intrusions—and

it's arguably the primary reason many committee members were uncomfortable including it in the proposal before you.

And third, the 1-hour threshold implemented without exception—regardless of landscape type or community need—will significantly compromise efforts to effectively treat high risk, high priority areas around communities in Oregon's fire adapted landscape. As wildfire smoke and wildfires constitute air pollution and pollution sources per ORS 468A.005, the 1-hour threshold will thus compromise Oregon's broader responsibility to "safeguard the air resources of the state" for "the overall public welfare of the state" as required by ORS 468.015 and ORS 468A.010.

Sincerely,



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