

MINUTES
SMOKE MANAGEMENT ADVISORY COMMITTEE (SMAC)
June 24, 2021 | 9:00 am – 2:45 pm
Zoom and In-person

477.552 Policy. It is the policy of the State of Oregon:

- (1) To improve the management of prescribed burning as a forest management and protection practice;
and
- (2) 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 under ORS 468A.035. [1989 c.920 §2]

Committee Members Present:

Gregory McClarren, Committee Chair, Public Representative
Rick Graw, Committee Vice Chair, Forest Service Representative
Kyle Williams, Industrial Landowner Representative
Scott Hanson, Non-Industrial Landowner Representative
Jason Simmons, Bureau of Land Management Representative

Others Present:

Ron Graham, Deputy Chief of Fire Protection Program, ODF
Nick Yonker, Retired Smoke Management Manager, Fire Protection Program
Margaret Miller, Air Quality, Department of Environmental Quality
Peter Brewer, Air Quality, Department of Environmental Quality
Pete Parsons, Smoke Management Meteorologist, ODF
Nick Winner, Roseburg Forest Products
Gary Votaw, Smoke Management Meteorologist, ODF
Kim Tham, Oregon Health Authority
Gabriela Goldfarb, Oregon Health Authority
Shauna Morris, Administrative Support, ODF
Chrystal Bader, Executive Support, ODF
Jenna Knobloch, Sustainable Northwest
Sande Albright, ODF
Mike White, CFPA

WELCOME – INTRODUCTIONS

Ron Graham started the meeting at 9:01 a.m. Introductions were made.

MINUTES APPROVAL

Gregory McClarren asked that those with any questions or factual revisions concerning the January 2021 meeting minutes send an email to Shauna Morris at Oregon Department of Forestry. Any comments received will be reviewed for approvals.

PROTECTION DIVISION REPORT

Ron shared division updates. The division has put a pause on hiring to replace Nick until the legislative session is over. Staffing will then be reassessed. In the meantime, Pete Parsons will be acting Lead Meteorologist and a limited duration smoke management meteorologist has been hired, Sherri Pugh. She is scheduled to start July 1st. Pete Parsons and Gary Votaw will be training Sherri and getting her acclimated to the position. It is a possibility that Smoke Management will move to the Policy side of

Protection, should Protection be split between Operations and Policy. Ron advised he will recommend Smoke maintain its manager. The result would be the lead worker as an additional staff position to Smoke, budget dependent.

Pending this legislative session, ODF's goal is to be able to add capacity in several areas including Fire Protection, Administrative Services for finances, fuels mitigation, prescribed fire, WUI mapping and operational capacity and increase to the Severity Program.

Eboard funding allowed ODF to add capacity, 13M funded additional positions and projects across the state. 5M for Severity Program allowed early onboarding of Severity resources, both air and ground, which have been critical in helping fight the early fire activity seen across the state. Cutoff Fire in the Klamath area and the 503 Fire near Warm Springs. Currently at PL 4 nationally, PL 3 in our region, PL 5 in the southwest. Resources are prioritized and demand is high. There are double the number of fires year-to-date and 4-5 times the average acres burned for this time of year.

Organizational structure updates of the Protection Division likely will be done by January 1. These will be based on legislative updates and recommendations for our Finance Unit by the MGO group.

DEQ REPORT

DEQ update presented by Margaret Miller.

- SMP State Implementation Plan (SIP) Revision Update
Submitted in June 2019, went to federal registers on May 25th, has an effective date of today, June 24, 2021.
- Monitoring Update
 - 67 PM2.5 monitors across Oregon
 - 7 FRM
 - 60 PM2.5 EST
 - Working to replace many nephelometers, hoping to update with versions that are more efficient to operate.
 - 7 counties in Oregon do not have monitors –Clatsop, Gilliam, Morrow, Sherman, Wheeler, Yamhill & Lincoln. Yamhill & Lincoln are scheduled for monitors soon.
 - 39 SSRAs (Smoke Sensor Receptive Area). 49 of the 67 PM2.5s are located within SSRAs (73%).
 - Preliminary monitoring fiscal analysis – annual costs (PM2.5)
 - \$1.6M FTE
 - \$24,965 average annual cost of a monitor. Includes equipment, data management, storage, staffing and making it publicly available.
 - Annual average funding received
 - \$196,714 from EPA. This also supports FRM/FEM monitors
 - \$20,000 is passed through to LRAPA
 - \$47,545 from USFS & BLM to support the PM2.5 monitoring network for forest health/Rx burning
 - This funding has not been renewed the past 2 years
 - BLM did direct DEQ to a grant program, but the information was received with only two weeks left in the application deadline. This wasn't feasible because all state agencies must get legislative approval to apply for federal grants.
 - DEQ needs additional funding in order to sustain monitoring network, a critical component of smoke management.
 - Would like to explore contracting with ODF for network support.

Action Item: Further explore funding sources for supporting monitoring network. DEQ and ODF to work together to conduct a fiscal analysis on fees as a possible funding option.

- EQC/BOF Presentation on Smoke Management
The joint BOF & EQC meeting held in March of 2021 went well. ODF, OHA and DEQ presented. No requests for additional follow up at this time.
- Community Response Plans
CRPs with 1-hr exemptions: Bend, Ashland, Enterprise (now treated as 24 hr rather than 1 hr)
Awaiting review: Lakeview (rough timeline within 3-6 months)
Working toward review: Baker City, Oakridge
Reallocated one of the grants to Ashland for HEPPA filters and to develop guidance for other communities to get HEPPA filters and to Oakridge to develop tool kit for community response planning.
Consider adding a page to directive on interpreting the language for documenting smoke incidences, will work toward documenting the 24 hr or 1 hr incidences rather than all smoke complaints.
DEQ working with Oregon Prescribed Fire Council on landing page for Community Response Plans. Plan to have a Smoke Management tab to their website.
- Other Topics
 - National Emissions Inventory – Done every 3 years. Nick and Margaret collaborated to gather all data.
 - Biomass Utilization – DEQ has a working group, includes Christina Clemons, USFS, EPA and various stakeholder representatives. Includes various biomass produces.
 - Have timeline of what the state has done for biomass thus far
 - Process flow with touchpoints
 - Reviewing incentives and what has worked previously

Kyle asked about SB762. Margaret advised DEQ would receive additional funding for Community Response Plans. Also the bill would give OHA funds toward smoke filtration devices. Goal to collaborate with OHA on these points. Hope to expand monitoring networks as well. Position additions would include meteorologist to help monitor smoke for winter and wildfire smoke and additional air quality positions similar to Peter Brewer's role in eastern region.

Margaret responded to questions about funding for the monitoring network. She noted more analysis needs to be done, i.e. breaking out costs for wildfire smoke vs. prescribed burning and working with ODF on a more comprehensive analysis on burn fees.

PUBLIC COMMENT

No public comments to be heard.

FUND BALANCE

Ron shared figures through May 2021 Fund Balance Report.

- Revenue from federal sources \$59,391.40, non-federal sources \$43,248 other \$15,000. Total revenue \$117,639.40.
- Expenditures: personnel \$223,686.98, supplies and services (S&S) \$17,093.99, total expenditures \$255,785.97.
- Total fund balance \$696,716.61
- Average monthly expenditures \$52,000. This is up from 2015 of \$36,000-37,000 per month. We have added smoke coordinator, COLA increase, additional vehicle, etc.

Projected fund balance remains stable. Low end \$600,000. Revenue is keeping pace. May get the Lead position with other funds, possible in this legislative session. Possible for manager position to be split funded. Likely by 2025 vehicle replacement will be needed for Christina Clemons' position, the burn coordinator. Lead Smoke Forecaster would be smoke funded. Reduction in burning last spring offset by the catch-up payment from the Forest Service of \$316,000. He noted Christina's salary is often offset by fires.

Hopes of new position increasing burn opportunities as Smoke becomes more adequately staffed. Pete mentioned there was a position de-funded at the Department of Agriculture in 2010, the workload fed over to ODF. Money was brought in with this new workload, yet no additional staffing was added.

2021 BURNING / INTRUSION / INCIDENT SUMMARY

Pete Parsons presented the Intrusion Summary Report.

- No intrusions in 2020, but there was COVID and a voluntary refrain on outdoor burning.
- Spring 2021 intrusions
 - 4/16 – Bend. 24 hr intrusion. Bend has the 24 hr exemption. Just below the NAAQs threshold.
 - West Bend project burn
 - Started on 4/15. Close to Tumalo Ridge RAWS, used this for tracking.
 - 350 acres, approximately 700 tons
 - 14:30-17:30, 7-11 mph winds NNE-NNW, gusts to 25 mph
 - Overnight drainage flow was the problem due to nighttime cooling, until about 0700.
 - Very few complaints from residents.
 - 5/11 – Bend 24 hr intrusion. Exceeded the NAAQs threshold – Bend pump station gauge.
 - West Bend project burn
 - 200 acres, 450 tons
 - Mitigation efforts: cutoff ignition sooner, 9am – 2pm. Reduced tonnage. Fewer stumps than the 4/16 burn.
 - Resulted in more smoldering, possibly due to dry weather.
 - Daytime winds ENE-NNW 4-7 mph, gusts to 14 mph
 - Incident, smoke to downtown Bend until 8:30am. Peak 466.4 ug/m3 at 4-5am.
- ODF Incident Log
 - Documents smoke intrusions as well as any other reported smoke.
 - Logged 37 additional smoke incidents. Under old rules there would have been over 20 intrusions.
 - New rules = more burning
 - 10 incidents logged in non SSRAs, below the 1 hr threshold.

Rick asked about moisture values and if it would be important for smoke forecasting. Pete advised that would be helpful, yet unsure how to gather this data. Rick noted Tumalo RAWS has fuel moistures. Would have to build this frame of reference and decipher how to collect the data.

Action Item: Margaret advised of need to collaborate on an After Action Review. Goal to have this anytime there is a NAAQs exceedance. Include Peter Brewer. Discuss mop-up techniques. Idea to have someone from DEQ lab team join for instrument related questions. Only for the 5/11 – the other was not a violation of the NAAQs. Rick Graw asked to join.

Gabriela shared goal of trying to evaluate success of Community Response Plans. Margaret noted idea of AAR of forecast and burn, as well as an AAR of CRPs as complimentary. Nick noted duff is not typically the problem on the west side of the Cascades, asked about consumption of stumps in the May

burn. Pete shared that the Bend pump station gave high readings very recently when no burning was being done. They took it offline due to malfunction. Margaret advised she would confirm that there were no equipment errors at fault. Discussion of minimal complaints, 4 total, interpreted as more understanding, ideally messaging is responsible for increased public awareness.

Action Item: Margaret will work with the DEQ Lab to determine whether Bend pump station had any malfunction issues that could impact performance or reading accuracy.

COVID burn restrictions- Gabriela Goldfarb, Kim Tham – OHA

Agreement at OHA that the voluntary request from burning wording can be removed from their website now that vaccines are available. Pete asked about removing it from ODF announcements. Margaret advised caution when removing this language due to it being wildfire season and wanting to avoid an increase in fire activity during the hot/dry summer.

OHA is working toward analyzing the wildfire health impacts data from hospitals and clinics during September 2020 wildfire event. In addition, she reported a multi-year wildfire health analysis is in the works for 2016-2020. A mortality study is also planned.

Burning PE in Applegate Update– Jason Simmons, BLM

Video complaint had been received regarding the use of Polyethylene in Williams, Oregon. BLM took the information/comments and incorporated into environmental assessments. Medford and Grants Pass fuels, 70,000 IBM, PA, shelf stock.

Small Woodlands Association Update - Scott Hanson, Non-Industrial Landowner / Small Woodland Association Representative

Scott shared they have many members in the rural fire district. Concern over Ch 340,264 – rules for burning state no burning within 3-6 miles within a large city. Concern is that the forestland owners in this range continue to have dangerous fuel build up. Rules for Clackamas & Washington county from 1981. Should these rules be reviewed? Would they consider a forest land exemption for those that are close to town, review distance? Could a solution be a letter permit? They issue these in NE Oregon, but not in NW Oregon. Is there a number, for example 2 piles per day at specific sizes? Margaret noted ODF, ODA, DEQ and OSFM are meeting quarterly to discuss these concerns. She shared some of the concern is because of where the ODF boundary areas are, as default they fall into the 264 rules. Advised this has been an issue for a while and there was an attempt to address this in a past plan review, but the thought was that ODF would permit the burns even though they fell outside their project boundary, DOJ denied allowing ODF to permit slash burns outside of their protection boundaries. There is an option for getting a burn permit from DEQ, but historically these permits have not been approved by managers because DEQ does not have forecaster, letter permits can be difficult, no one to guide burn/piles, etc. Matt Mackey will coordinate with Tim Holschbach regarding this process.

Action item: Follow up/coordinate with Matt Mackey, Tim Holschbach regarding rules/process to move ODF protection boundary.

METRICS DISCUSSION

Margaret shared the Performance Measures Document.

Prior to this SMAC meeting, OHA (Gabriela Goldfarb & Kim Tham) and SMAC member Kyle Williams, Industrial Landowner Representative had a discussion around the metric related to protecting public health. The group landed on the updated language:

“Protect public health by having zero intrusions – or – smoke incidents that exceeds the 24-hour PM2.5 threshold of 26ug/m3 and 1-hour PM2.5 threshold of 70ug/m3. *SSRA with 10hr exemptions will not be held to the 70ug/m3 threshold.”*

Goal to meet to finalize the edits. Nick shared desire to review and edit this document during SMAC meeting, need for all to be present and have input. Edits discussed as follows:

- 4) Identify meetings, i.e. AARs, Annual EPA meeting
- 5) Future deliverable goes to Rick, something he is working on. Westar smoke management, associated?
- 6) See what Christina thinks of that first deliverable – hosting the annual training of on emission reduction of prescribed burning.

Action item: Follow up with IT adding PE box to gather that piece of the data

Action item: Review this performance measure with Christina

Future deliverables – Carbonator/ACI has been labeled an incinerator, therefore requires specific permitting. Gregory asked about efficacy of this technique? Nick noted the use of this would be good, but implementation of this is not part of our program – DEQ or EPA. Rick Graw had concerns about the unit needing to be permitted by DEQ and ODF. Nick suggested SMAC will address ACI options and whether or not it will change fees, at the next Smoke Review. Margaret advised DEQ is working on this Title V permitting. “Identify emerging emissions reduction techniques and their viability”

- 7) Move up to item 3

Deliverable 2 – completed

8) Stressed importance for IT support. Ron noted IT is funded by the admin prorated paid for Protection Division or it would be cost to smoke directly to get third party IT support. Rick noted goal to discuss SMAC issues at every meeting (ie IT support, funding, administrative support) as well as possible solutions – make a list.

9) Rick suggested this report may address items in the Wildfire Council, but may not be realistic. Agreement to remove this item & continue to be aware of concerns and discuss topics as they are presented.

DATA SYSTEM UPDATE

Ron shared ODF IT is collaborating with Washington Department of Natural Resources. More permissions and security, goal to have a similar product of WDNR. Reminder from Margaret adding check box for the PE to current system. Hope to have a meeting with IT before end of July, timing pending fire activity. Plan to have joint meeting with WDNR shortly after.

ACTION ITEMS

Action item 1: Margaret will circulate the notes of the Performance Measures.

Action Item 2: Preliminary fiscal analysis of fees for monitoring done in collaboration between ODF & DEQ.

Action Item 3: Ron will f/u with everyone on IT updates.

Action Item 4: Margaret will update the WV Open Burning announcement burn notification (with Pete) to reflect the changes in the voluntary refrain from burning comment. Coordinate with OSFM possibly as well.

Action Item 5: Margaret will work with Pete, Ron to look at adding to the directive as it relates to documenting incidences.

Action Item 6: Margaret meet with Scott Hanson, investigate options for the interim. Meet with Tim Holschbach & Matt Mackey.

Action Item 7 Rick asked for inclusion in emails for community responses, approved, awaiting. Also add Pete. Margaret will provide SMAC updates around exemption request, approvals, denials, etc.

Action Item 8: Margaret will schedule AAR on Bend intrusions. The lab has not finished investigation on this monitor in question.

Action Item 9: Health outcome reports will come out – Gabriela

Action Item 10: Follow up with ODF IT regarding check box for tracking PE – track use of PE on burns.

NEXT PROGRAM REVIEW

Topic to include discussion around all land areas in the state being included in the SMAC program, rather than just “forestlands” identified by the forestland classification process. Likely this will take a statutory change. Mandatory, fee inclusion. Goal of a focused, simplified review. Gregory shared thoughts that we use the old review committee to build on.

Pete asked about agricultural burning and if there has been any discussion with Oregon Dept of Agriculture regarding this? Gregory noted that this supports his push to have all lands participate in the Smoke Management Program. Margaret asked about who manages this field burning? She noted 264 is up to be reviewed and changed.

NEXT MEETING

January 2022 – late in the month

Doodle poll to come