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January 17<sup>th</sup>, 2018

Oregon Smoke Management Review Committee  
2600 State Street  
Salem, OR 97310

Re: Oregon Smoke Management Plan review

Committee Members,

Collins Pine Company operates manufacturing facilities and owns and manages 63,000 acres of commercial timberlands in Lake and Klamath Counties. Our operations have managed these lands since the late 1930's and we continue to manage them for the long term sustainability and for long term benefits.

Our forests are eastside dry site forests that are susceptible to fire and the negative consequences of them. For example in August of 2012 the Barry Point Fire consumed 24,300 acres of our lands in Lake and adjoining Modoc counties and had a catastrophic effect on our operations, our long term sustainability and to our communities. This fire consumed a large portion of federal lands that had not yet been treated to reduce fuel loadings and thus burned at a horrific rate with catastrophic damages

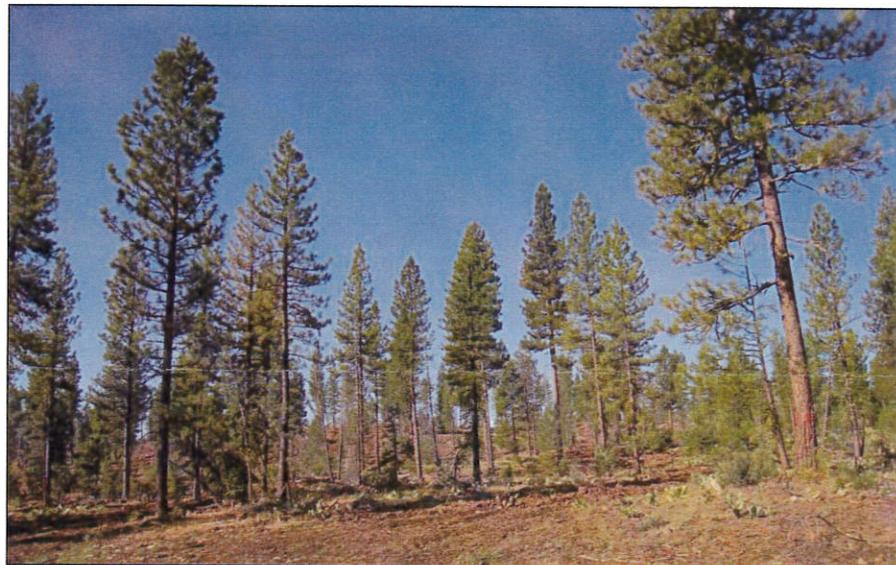
The ability to reduce the forest fuels and fuel loadings that are present on both our lands as well as the surrounding federal lands is paramount to reducing the chance for another Barry Point incident. This happens in two ways.

On our own lands we manage our fuel loadings and the productivity of the lands by applying forest operations that both produce merchantable material for our sawmill but also by thinning out smaller material that reduces the ladder fuels, increases the growth on the existing trees, but most importantly reduces the chance for catastrophic fire events



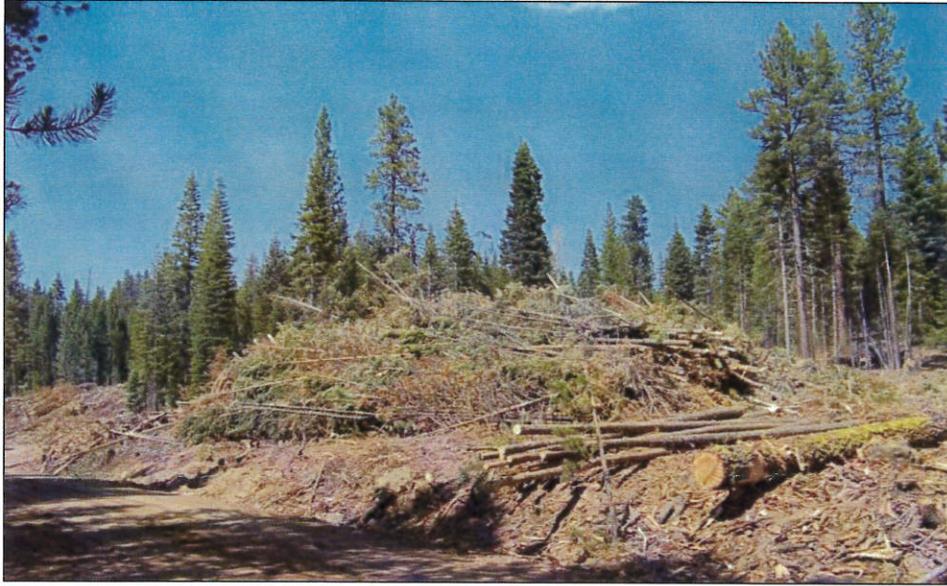
Mechanical thinning of overstocked stand w high fuel loading - Collins 1997

In doing this there is waste material that we are not able to utilize today, limbs, tops and debris (slash) that is piled in landings that we have a need to remove by the use of burning these slash piles during appropriate times in the winter when the fire danger and liability is limited and also that fits into the smoke management program locally.



Collins harvested and thinned pine stand

The removal of these piles is crucial to our operating plans in reducing the fire danger – if these piles are left they then can become islands of concentrated fuels that make any fire very difficult to control as embers can ignite these piles. Thus it is imperative that we have the ability and the burning window to remove these piles.



Landing slash pile – Collins property

On federal lands, it is also imperative to do the mechanical removal of excess biomass ('fuels') to properly treat the lands and set them up for long term management. Without the removal of these fuels you end up with ladder fuels and fuel loadings that preclude the use of controlled fires in treating the stands. You have to reduce the fuel loadings first or you end up with controlled fire results that are unsatisfactory by any measure.



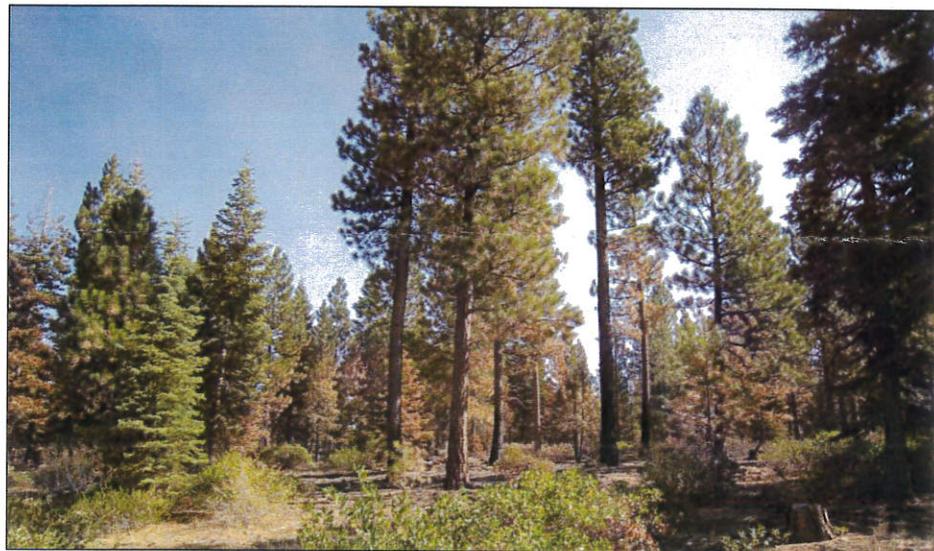
UTC Underburn (10/1/2010) – Unsatisfactory results from not removing the fuel loadings prior to a controlled burn (mechanically thinning)

You have to remove the material, it ends up in landing piles, and if there are limited markets for this, you end up also burning them in place just like on our private grounds to reduce this concentrated fire hazard.



UTC Project Area with landing pile and overstocked stand in background

Once the federal lands are managed to reduce the ladder fuels and fuel loadings they have been applying controlled burns to these forest stands to further reduce fine fuels and to manage the stands for fire tolerant (and drought resistant) species such as Ponderosa Pine.



UTC Underburn (10/1/2010) low intensity underburn w satisfactory results

These activities can be effective in further reducing the chance of catastrophic fires that impact both private as well as federal lands. Their ability to conduct these burns are dependent upon favorable weather and fuel conditions but also upon a

smoke management policy that allows for the use of fire and the subsequent smoke intrusions that can happen.

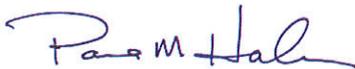
Smoke intrusion into our communities will happen. It needs to be controlled. But it also has to be taken into context of what needs to happen out in the forests and fire prone environment of Eastern Oregon to deal with the facts that fuel loadings must be reduced or we will continue to see catastrophic fires occur. We have to be able to take action to reduce this risk.

Therefore we are asking the committee and its sponsoring organization, the Oregon Department of Forestry and the Oregon Department of Environmental Quality, to strongly consider the following in their policy development:

- Incorporate into the language the differentiation of the wet and dry forests and their respective needs for fire and therefore smoke.
- Align Oregon's smoke policy with EPA's empirically-based 24 hour air quality standard.
- Provide maximum flexibility and opportunity to implement prescribed fire in prioritized high-risk/high value treatments, including slash pile burning.
- Develop and implement a public health strategy to protect people from short-duration prescribed fire smoke.

In order to achieve forest management objectives on eastside forests we need a workable Smoke Management Plan that allows for the flexibility to deal with the conditions that exist on the eastside. The reality is that our forests are overstocked, that the fuel loadings need to be reduced, and once fuel loading is reduced that we have the flexibility to come in and deal with the residual fuels with fire under suitable conditions and that minimize or mitigate the impacts to our communities. We will have smoke one way or another. As we saw in 2017 there will be fires. We need a smoke management plan that is flexible enough to work with our local conditions and that helps us manage the fuel loadings, not hinders our ability to reduce it.

Respectfully submitted for your consideration,

A handwritten signature in blue ink that reads "Paul M. Harlan". The signature is written in a cursive style with a large initial "P" and "H".

Paul M. Harlan  
Vice-President, Collins Pine Co.