September 20, 2017

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

The Deschutes County Board of Commissioners would like to provide support for the attached letter from the Deschutes Collaborative Forest Project suggesting revisions to the Oregon Smoke Management Plan. We believe the suggested revisions are a step in the right direction for Oregon when it comes to providing for safer communities and healthier forests while still protecting air quality and responding to public health concerns.

We appreciated the opportunity to join the Smoke Management Review Committee in June as part of the field tour to the Bend area while you learned about some of the challenges being faced by fire managers in implementing prescribed fire in dry fire adapted forests near communities while trying to meet the requirements of the Oregon Smoke Management Plan. As you also heard, Deschutes County has a challenging history of wildfire as well as many collaborative efforts that have been undertaken over several years to mitigate its negative effects. In recent years we have experienced fires across all parts of the County that have threatened communities and have had widespread smoke impacts to citizens. Whether it is the Milli fire from 2017 that threatened communities around Sisters, the Two Bulls fire in 2014 threatening Bend, the Sheridan fire in 2016 threatening residential areas near Sunriver or the McKay fire in 2017 threatening subdivisions near the City of La Pine we don’t have to look back too far to see this is a threat we experience on an annual basis. We also recognize that in some cases portions of these and other fires have been able to be contained more quickly because of treatment, including prescribed fire, thinning and mowing that occurred ahead of time which resulted in protection of communities and natural resources that would have been put at greater risk if this work had not been completed.

With these experiences in mind we realize that “no fire and no smoke” is not an option for the fire adapted ecosystem that we live in. We do recognize that planned prescribed fire, along
with other forest management activities such as thinning and brush mowing will help to make our communities safer and our forests healthier. When fire is planned we can also communicate with the public in advance about when and where to expect smoke and how they can mitigate effects to their health.

Specifically related to the proposed changes, we have found that burning in high priority areas next to communities is especially challenging from a smoke management perspective. However accomplishing prescribed burns in these areas that may serve as a future strategic fuel break during a wildfire is critical to being able to protect social, economic and environmental values. This is why we feel that more flexibility in the rules for high priority areas next to communities and redefining smoke intrusions by allowance of minimal smoke above background levels while still complying with the Clean Air Act are critical changes to be considered as part of the rule revision process.

We hope you will consider the challenges we are facing as you weigh recommendations for changes to the Smoke Management Plan through the rule revision process. While changes to this policy are just one opportunity to allow more of this important work to be completed, we feel that allowing some predictable smoke now will help keep our communities safer and forests healthier in the wildfire seasons to come.

Sincerely,

DESHUTES COUNTY BOARD OF COMMISSIONERS

[Signature]

Tammy Baney, Chair

[Signature]

Anthony DeBone, Vice-Chair

[Signature]

Philip G. Henderson, Commissioner