Eastern Oregon Counties Association
1106 K Avenue, La Grande, OR 97850 (541) 963-1001

February 20, 2018

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

RE: Smoke Management Plan Review

Dear Oregon Smoke Management Review Committee:

The Eastern Oregon Counties Association (EOCA) represents ten counties across eastern and central Oregon. Significant portions of these counties are fire-adapted forested landscapes that are federally owned and managed. Past management practices coupled with other factors have resulted in these lands becoming dense, over-stocked, unhealthy, and at-risk to increasingly frequent, large, and destructive wildfires that threaten the public health and safety of our community members.

We know the only effective way to address this challenge is to actively manage more of our public lands via a suite of actions that include increased timber harvest and thinning (to enhance stand structure and reduce stand density and biomass) and prescribed fire as necessary complements to bring about landscape health and resilience. In addition, we believe that environmental regulations should promote and safeguard healthy environments, landscapes, and communities as well as public health. We therefore encourage you to develop a smoke management framework that enables our communities and land management partners to effectively address the landscape and human health challenges we face in a realistic manner.

Such a framework would do the following: First, it would support (and expect) more active management of public lands through increased timber harvest, thinning, and other vegetation treatments that effectively reduce biomass, and follow such treatments with prescribed fire as the most effective tool available to mitigate wildfire behavior and severity. This effort, if implemented, will reduce fuel loads and potential smoke impacts and positively impact human and landscape health. Additional investments on the part of Oregon and others to develop biomass markets and infrastructure in our counties would enhance this effort.

Second, such a framework would change the Oregon Department of Environmental Quality's (DEQ) current definition of smoke intrusion to more closely align with the Environmental Protection Agency's 24-hour NAAQS "Moderate" category (in the sense of not exceeding the upper bounds of that category). We realize this probably is the most controversial recommendation you will consider. However, we take our public health responsibilities seriously, and note that our recommendation here is not offered as simple license to create

more smoke or to ignore smoke impacts to human health that might result from increased use of prescribed fire. Rather, it is motivated by our conviction that environmental regulations should promote the health of rural landscapes, communities, and individuals; that DEQ's current definition hinders this effort, despite its objective; that the recommended alignment will facilitate more treatment—and more effective treatment—of forested landscapes; and that this approach is the most effective way to protect human health and our communities from wildfires and the impact of wildfire smoke long-term.

Third, it would incorporate a "best management practice" approach to ensuring prescribed fire efforts among different land management agencies/owners are coordinated at the local level to avoid unintentionally heavy concentrations of smoke that might impact human health.

Fourth, it would incorporate a "best management practice" approach to notifying the public when prescribed fire will be used in their area, as well as educating members of the public about the "what and why" of using prescribed fire as a management tool to address forest health needs and mitigate the impacts of wildfire.

Finally, we believe such a framework would adopt a phased-in approach that provides more burn opportunities as land managers commit to utilizing the full suite of management actions identified above; as land managers demonstrate increased capacity to use more prescribed fire in an effective manner than minimizes smoke impacts to human health; as the coordination/notification/education components identified above are developed and effectively implemented; and as monitoring continues to support increased use of prescribed fire (to complement other treatments) as the most effective way to avoid heavier smoke impacts and promote human health and healthier landscapes by addressing the conditions for, and mitigating the impacts of, wildfires.

In conclusion, EOCA believes that environmental regulations should promote and safeguard healthy environments, landscapes, and communities as well as public health, and that a smoke management framework which incorporates the above recommendations will do this and thereby effectively help bring about healthier communities and landscapes that better protect and promote human health long-term.

Respectfully,

Steve McClure

Steve McClure
Chairman