



## Lake County Resources Initiative

*A Healthy Economy and Environment based on Sustainable Natural Resources, ensuring Quality of Life for Present and Future Generations*

November 20, 2017

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

To the Oregon Smoke Management Review Committee:

On behalf of the Lake County Resources Initiative, I am submitting the following recommendations to be incorporated in the Oregon Smoke Management Plan review. Our input is based on experience working the Lakeview Stewardship Group, one of the oldest forest collaboratives in Oregon on the Fremont part of the Fremont-Winema National Forest in Lakeview, OR. This experience has not only taught us that prescribed fire treatments are essential to our ability to protect, restore, and enhance the myriad ecological, economic, and social benefits that our forests provide, but that we are falling further and further behind in the implementation of this critical tool. This is particularly true as we attempt to use prescribed fire in and around communities, Smoke Sensitive Receptor Areas, and other highly valued portions of our forested landscapes to mitigate wildfire risk to the public, firefighters, homes and private property, and the forest itself.

Over the past 135 years the number of fires has not changed, usually 150-450/year in our area, it is the size and intensity of the fires that has changed. Historically fire sizes were 450-750 acres in size and the past decade that has increased with 90-100,000 acres not being uncommon. Unnatural forest conditions, coupled with climate change, have created the conditions for extreme wildfires and dangerous smoke that threaten our wellbeing, our way of life, and our future. This is not acceptable and we urgently seek a change.

In the context of fire-adapted forest management and restoration, we believe the current Smoke Management Plan inadequately reflects the essential and inevitable role of fire in sustaining our fire-adapted forests and protecting our forest-dependent communities. We are concerned that the current rules do not recognize the use of prescribed fire treatments to emulate natural fire. In our forest types, no fire is not an option, which is why we use prescribed fire to more compatibly balance short-term risks (such as prescribed fire smoke exposure) with long-term consequences of unnaturally severe wildfires that threaten to disrupt ecological, economic, and social values (including public health) over much longer timeframes.

We are asking the Committee and its sponsoring organizations – the Oregon Department of Forestry and the Oregon Department of Environmental Quality – to carefully consider the following proposed revisions (see also Attachment A) to the Smoke Management Plan:

- Incorporate language that reflects differences between dry and wet forests and their respective fire regimes
- 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 treatment areas
- Develop and implement a public health strategy to protect people from short-duration prescribed fire smoke

Our goal in identifying and prioritizing these areas for revision is twofold: facilitate changes to Oregon’s Smoke Management Plan that are necessary for a meaningful increase in high-priority prescribed fire treatments, while also outlining a more holistic strategy to measure and respond to public health concerns associated with planned, short-duration prescribed fire smoke impacts to communities and people.

In conclusion, our experience in Lake County has corroborated what forest scientists and researchers have shown with increasing clarity in recent years: in order to mitigate the severity and impact of future wildfires on the things we care about, we must have greater flexibility to implement prescribed fire treatments, particularly in high-priority areas within our local forest landscape. To achieve this desired outcome, we need a smoke management regulatory framework that enables increased opportunity to burn, while establishing innovative measures that address short-term air quality concerns *and* reduce the longer-term risks posed by wildfire. We believe the proposed revisions outlined above accomplish both goals.

Without these changes, we will continue to fall further behind, placing the people and forests of South Eastern Oregon at increasing risk and exposure to extreme wildfires and dangerous levels of wildfire smoke. This is not the future we want and we strongly advocate for changes to Oregon’s Smoke Management Plan that better reflect the importance of prescribed fire to sustain resilient forests and healthy communities now and for generations to come. We are closely following the Committee’s work and trust that you will thoughtfully consider how to incorporate the input of Lake County Resources Initiative when crafting recommendations that reflect the needs of Oregon’s fire-adapted forests and forest-dependent communities.

Respectfully,



James K. Walls  
Executive Director