



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

September 27, 2017

To the Oregon Smoke Management Review Committee:

On behalf of the Ochoco Forest Restoration Collaborative (OFRC) and undersigned members, we submit the following recommendations to be incorporated in the Oregon Smoke Management Plan review. Our input is based on experience working to achieve ecological forest restoration while reducing fire danger and providing benefit to the local economy in Prineville and Crook County. 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 we are falling further and further behind in getting them done. This is particularly true around the Wildland Urban Interface and, Smoke Sensitive Receptor Areas.

As recent wildfires, such as Bailey Butte (2014) and Corner Creek (2015), and this summer's extreme regional smoke impacts demonstrate, this is a problem that cannot wait any longer for a solution. Unnatural forest conditions, coupled with climate change, have created the conditions for extreme wildfires and dangerous smoke that threaten our air quality, timber resources, and recreation areas. This is not acceptable and we urgently seek a change.

In our region, no fire is not an option. The dry forests of the Ochoco Mountains evolved with frequent, low severity fires. A hundred years of fire suppression has filled them with fuels. They are ready to burn, and the problem is growing worse year by year. The only real question is whether we will burn them in a controlled situation or let wildfire take them. In a prescribed fire, we have influence on how much timber volume is lost (usually very little, e.g., 1-2%), how much wildlife habitat is compromised (very little), and how much human communities are affected by smoke. Prescribed burn professionals can use upcoming weather forecasts to plan prescribed burns for days when the wind is most like to be blowing away from towns. By contrast wildfire usually occurs on the hottest, windiest days leading to effects like this summer.

The Smoke Management Plan should reflect the role of prescribed fire in our dry, fire-adapted forests.

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:

- Make a distinction 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 such as the WUI.

- Include a public health strategy to protect people from short-duration prescribed fire smoke

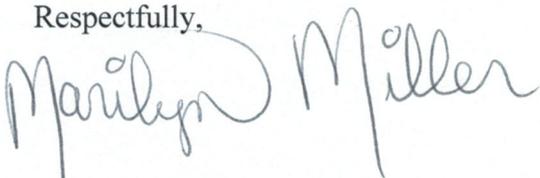
Our goal in identifying and prioritizing these areas for revision is twofold: facilitate changes to Oregon's Smoke Management Plan that are necessary for a meaningful increase in high-priority prescribed fire treatments, while also outlining a more holistic strategy to measure and respond to public health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

More prescribed fire will result in better outcomes for forest ecology, timber resources, recreational opportunities and community health. Although prescribed fire will create short term smoke impacts, they will be of lower intensity and shorter duration than the long term effects of wildfire. Further, we can plan on when they will happen, and give people more meaningful opportunities to respond appropriately.

In conclusion, our experience on the Ochoco National Forest 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 be able to implement more prescribed fire treatments, particularly in high-priority areas. To achieve this, we need a smoke management framework that enables increased opportunity to burn. Prescribed fire, rather than wildfire, presents better opportunity for innovative measures that address short-term air quality concerns. 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 Crook County 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 Ochoco Forest Restoration Collaborative when crafting recommendations that reflect the needs of Oregon's fire-adapted forests and forest-dependent communities.

Respectfully,



Marilyn Miller  
Executive Committee, OFRC

Ochoco Forest Restoration Collaborative members represent the following organizations:

The City of Prineville  
Crook County  
Oregon Wild

The Nature Conservancy  
Western Environmental Law Center  
Central Oregon Intergovernmental Council

## **Attachment A: Proposed revisions to Oregon’s Smoke Management Plan**

### **REVISION RECOMMENDATION:**

Incorporate language that reflects differences between dry and wet forests and their respective fire regimes

#### **Revision Goal:**

The goal of this revision is to provide an objective, science-based rationale to support other proposed revisions that would increase flexibility for prescribed fire use (particularly in high-priority prescribed fire treatment areas) as an essential treatment to increase forest health/resilience, mitigate risks to ecological, economic, and social values (including public health) posed by wildfire, and better account for tradeoffs between prescribed fire and wildfire.

#### **Revision Rationale:**

The current SMP does not differentiate between the natural role of fire across the many forest types in Oregon. The evidence is clear that dry and wet forests have substantially different reasons for prescribed fire, and substantially different consequences if it is limited. By acknowledging the inherent differences between dry and wet forest types and their respective fire regimes, we provide a basis on which to have different regulatory frameworks for different areas. This allows us to optimize air quality based on the unique circumstances of the local ecosystems.

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### **REVISION RECOMMENDATION:**

Align Oregon’s smoke policies with EPA’s empirically-based 24-hour air quality standard

#### **Revision Goal:**

The goal of this revision is to facilitate a meaningful increase in high-priority prescribed fire treatments by realigning Oregon’s definition of smoke incidents and intrusions to be consistent with federal Environmental Protection Agency’s 24-hour National Ambient Air Quality Standard (NAAQS) and tiered Air Quality Index (AQI), and by establishing a “minimize smoke intrusions” air quality objective. Along with additional metrics to better measure the extent and timing of short-duration prescribed fire smoke impacts, this revision would facilitate expanded burning opportunities while creating a mechanism to remain consistent with current and future science-based air quality policy.

#### **Revision Rationale:**

The current SMP utilizes a definition of smoke incidents and intrusions substantially reduces opportunities to implement high-priority prescribed fire treatments and reduce wildfire risk to critical ecological, economic, and social values. This revision would align Oregon’s definition of smoke incidents and intrusions to be consistent with EPA’s science-based 24-hour standards for public health concerns posed PM 2.5 emissions. Further improvement to the definition of smoke incidents and intrusions could be made by incorporating additional metrics and measurement techniques, such as spatial extent and timing/time of day, to better understand, track, and mitigate short-duration prescribed fire smoke impacts on communities, people, and sensitive groups.

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**REVISION RECOMMENDATION:**

Provide maximum flexibility and opportunity to implement prescribed fire in prioritized high-risk/high-value treatment areas

**Revision Goal:**

The goal of this revision is to provide maximum flexibility and opportunity to implement prescribed fire treatments within identified and prioritized areas of local forest landscapes where wildfire risk to critical ecological, economic, and social values warrants it. This includes allowances for increased smoke and intrusions/incidents in nearby SSRAs/communities at levels up to, but not exceeding, the federal 24-hour NAAQS threshold.

**Revision Rationale:**

In some areas – such as the Wildland Urban Interface - wildfire risk to critical ecological, economic, and social values is much greater than impacts of prescribed fire (including short-term exposure to smoke). These areas should be pre-identified at a county and local forest level (drawing from past, present, and future planning efforts such as Community Wildfire Protection Planning and Quantitative Wildfire Risk Assessment efforts). Greater flexibility should be provided to increase the window of opportunity when prescribed fire can be used to mitigate wildfire risks in these areas. In these high-priority prescribed fire treatment areas, maximum flexibility is warranted to increase the window of opportunity when prescribed fire can be used.

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**REVISION RECOMMENDATION:**

Develop and implement a public health strategy to protect people from short-duration prescribed fire smoke

**Revision Goal:**

The goal of this revision is to address potential public health impacts of increased use prescribed fire and associated prescribed fire smoke by establishing new language and/or references within the Smoke Management Plan that outline a common strategy, resources, and protocols that support collaboration between fire managers and local, state, and regional public health organizations to protect communities, the public, and sensitive groups from short-duration exposure to prescribed fire smoke.

**Revision Rationale:**

Increased prescribed fire will increase prescribed fire smoke, some of which is likely to enter nearby communities or populated areas. Consequently, these changes should be accompanied by a complementary strategy to protect communities, the public, and sensitive groups from short-duration prescribed fire smoke impacts. We recommend a collaboratively-developed public health strategy, protocols, and resources specific to prescribed fire smoke and air quality concerns like the *Oregon Wildfire Response Protocol for Severe Smoke Episodes*.