February 26, 2018

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

To the Oregon Smoke Management Review Committee:

Dear Sirs and Madams:

My name is Frances Preston, I live in Prairie City, in the County of Grant.

I write you today as a concerned citizen.

As you are all very much aware in Grant County Oregon we have been having a lot of “smoke” first the Canyon Creek fire then prescribed burning.

Increased prescribed fire will increase negative health impacts due to inhalation. We have a lot of vulnerable residents (elderly, children, newborns, cancer, COPD, and anyone who spends time outdoors). As you are aware this leads to serious respiratory and heart health conditions. Rural demographic of an increasingly older population base continues, the vulnerability of rural communities is increasing.

We need more science on the impacts of smoke.

EPA has not established national ambient air quality standards (NAAQS) and there are no scientifically peer review and acceptable thresholds for health effects to occur at averaging periods for any concentrations of smoke less than the 24-hour concentrations. Oregon DEQ believes that the empirically-based and dated NAAQS and the tiered Air Quality Index for public health concerns are not protective enough. I would agree. I understand that the difference between the national and the state standards are substantial with Oregon DEQ standards being more protective of humans. My experience has been that in rural areas and cities in our case if you don’t live in John Day or Baker City as an example they don’t even care what the air quality is as if to say rural lives don’t matter.

They are telling us with the hope we will believe that prescribed fire at today’s pace and scale has fewer negative smoke-related health impacts than wildfire and wood stove use, due to shorter durations as if to say... this comparison reduces the additional health risks that are added from prescribed burning. Our experience with prescribed fire is once they light the fire they don’t put it out and you can/have had heavy smoke, day and night for day-after-day.

It is my opinion DEQ standards are more protective of human health related to smoke inhalation. Don’t feel undue pressure to align Oregon’s smoke policies with
EPA's standards simply due to the bad impact it will have on communities, people, animals, plants, and vulnerable groups.

Prescribed Burning and other Forest Management Options need to be balanced with Public Health. For 20 plus years now various agencies and their partners have wanted to do a better job of managing the forests; however they continue to pursue the same management strategies, but now with a focus on pushing the air quality limits (willing to make a policy of over the limits and they will take the consequences; i.e., warnings, write ups, fines, etc.) to gain additional prescribed fire burn days.

Oregon's annual wildfires emit more carbon monoxide, nitrous oxide, fine particulates and volatile organic compounds than industrial sources or vehicles. We don't need more.

Changes in smoke management regulations are not needed.

A shift to a comprehensive, diverse, and safer array of forest management strategies is needed.

Don't make health trade-offs when there are other, safer options already available.

Please do not weaken Oregon's DEQ air quality standards.

Thank you!

Best Regards,

Frances M. Preston

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