December 5, 2017

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

To the Oregon Smoke Management Review Committee:

On behalf of The Tree Farm LLC in Bend, OR, we would like to voice our support for the increased use of safe and effective prescribed burning in Central Oregon's forest. We have learned that prescribed burning under controlled conditions in the spring and fall allows the Forest Service to reduce the risk of larger uncontrolled fires during the heat of the summer. This summers' Milli Fire near Sisters once again demonstrated the efficacy of thinning followed by prescribed fire as the most effective tool we have available to reduce wildfire risk to our communities and the people that live, work, and play in our forests; forests that are the backbone of our economy and our way of life.

As developers of The Tree Farm, residential community on the west side of Bend, we know first - hand how the impacts of prescribed burning can reduce fire fuels and improve the health of an ecosystem. In May of 2016, we participated with Bend Park and Recreation District, USDA Forest Service and Region 6 Deschutes National Forest to perform an 82-acre prescribed burn on open space within the residential community. It was a very successful event that was fully supported by The Tree Farm LLC Board of Directors and Project Manager.

We know that to increase the use of prescribed fire we need meaningful reforms to Oregon's smoke management rules. The recommendations outlined in the attached letter from the Deschutes Collaborative Forest Project represent a viable and holistic strategy that would enable greater use of prescribed fire to counter the trend towards larger and increasingly severe wildfires, and the serious social, economic, and ecological impacts those wildfires cause in our forests and communities.

And while we recognize that increased prescribed fire may lead to an increase in short-term smoke impacts in our communities, we also recognize the need to fight wildfires before they happen. It's important to remember that there is no smoke-free option to living in central Oregon. The question is: are we applying prescribed fire strategically in the forests around our communities to reduce the likelihood of severe wildfires (and their smoke) that last for weeks in the summer and have far-

reaching negative consequences on public health, local economies, and the long-term resilience of our forests.

Ultimately, we support a more holistic solution to prescribed fire and smoke management than what is currently provided by state policy. We believe that the short-term impacts of prescribed fire will be far less than the impacts of wildfire. For while we may be reducing near-term exposure to smoke by limiting prescribed fire now, it comes at the expense of future Oregonians who will face increasingly severe wildfires and wildfire smoke. We ask that you carefully consider strategies to increase the use of prescribed fire while protecting air quality and the health of our communities in the long run.

Respectfully,

Kirk Schueler
President and CEO | Brooks Resources Corporation
Managing Member of The Tree Farm LLC

DESCHUTES COLLABORATIVE FOREST PROJECT

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

September 12, 2017

To the Oregon Smoke Management Review Committee:

On behalf of the Deschutes Collaborative Forest Project (DCFP), we submit the following recommendations to be incorporated in the Oregon Smoke Management Plan review. Our input is based on collective experience working as a diverse coalition of local elected officials, land management experts from local, state, and federal agencies, tribes, environmental organizations, industry groups, recreation interests, and others, to increase the health and resilience of our fire-adapted forests and forest-dependent communities around Central Oregon. 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 areas of our forested landscapes to mitigate wildfire risk to the public, firefighters, homes and private property, and the forest itself.

As recent wildfires in Central Oregon such as Pole Creek, Two Bulls, and Milli demonstrate, this is a problem that cannot wait any longer for a solution. Overly dense forest conditions with increased fuel loads, 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.

Over the past ten months, the DCFP and its local, state, and federal partners engaged in a process to better understand the barriers and opportunities to increase prescribed fire use. Our shared-learning has revealed several key drivers affecting our ability to implement prescribed fire treatments, principal among them being Oregon's smoke management regulatory framework. 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 incorporate 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 Central Oregon 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 implement prescribed burns, 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 in the attached accomplish both goals.

Without these changes, we will continue to fall further behind, placing the people and forests of Central 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 the DCFP and its member organizations when crafting recommendations that reflect the needs of Oregon's fire-adapted forests and forest-dependent communities.

Respectfully,

Sally Russell
Chair, DCFP Steering Committee

Ed Keith
Vice-Chair, DCFP Steering Committee

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 OR SMP does not differentiate between the natural role of fire across the many forest types in Oregon. This revision is important because it underscores the unique ecological, economic, and social reasons for prescribed fire use in the dry forests (primarily southwest, central and eastern Oregon) and wet forests (primarily west of the Cascade crest). By incorporating language that reflects the inherent differences between dry and wet forest types and their respective fire regimes, such a revision provides an important scientific foundation to support the use of prescribed fire in fire-adapted forests as the most effective management tool to mitigate wildfire severity and effects.

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 OR SMP 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 by 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.

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:
There is a need to increase opportunities to implement prescribed fire in areas of overlapping ecological, economic, and social importance and high wildfire hazard. By maximizing opportunities to implement prescribed burning in these priority areas (identified through wildfire protection planning and prioritization efforts such as CWPP and QRA), this revision to the OR SMP will facilitate prescribed fire treatments in locations where wildfire risk to important values is greater than impacts of prescribed fire (including short-duration smoke exposure). In these identified high-priority prescribed fire treatment areas, maximum flexibility is warranted to increase the window of opportunity when prescribed fire can and should be used to safely and effectively mitigate wildfire risks over time.

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:
There is recognition that increased flexibility and opportunity to implement 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. This revision would establish a collaboratively-developed public health strategy, protocols, and resources specific to prescribed fire smoke and air quality concerns, similar to the *Oregon Wildfire Response Protocol for Severe Smoke Episodes*.