

**Presiding Officer's Report to Board of Forestry  
RE: Rulemaking Hearing**

**Date:** November 21, 2018  
**To:** Oregon Board of Forestry  
**From:** Tim Holschbach  
**Subject:** Presiding Officer's Report on Rulemaking Hearings

**Hearing Dates:** August 21, 22, 23, 28, and August 29, 2018.

**Hearing Locations:** The OSU Extension Service Meeting Room, La Grande; Deschutes Service Center, Bend; Oregon Institute of Technology Campus, CU Room, Klamath Falls; DEQ Admin Office, Eugene; Smullin Center, Medford

**Title of Proposed Rule:** Oregon Smoke Management Plan Review

This report contains summaries of the public hearings and oral comments.

**La Grande Hearing, August 21, 2018, at 7:00 p.m.**

There were six attendees at the public hearing in La Grande. Prior to the hearing, Michael Orman from the Department of Environmental Quality (DEQ) and Nick Yonker from the Oregon Department of Forestry (ODF) provided a joint PowerPoint presentation on the background and operations of the Smoke Management program and proposed changes to the Oregon Smoke Management Plan.

The rulemaking hearing on the proposed rules was convened. People were asked to sign registration forms if they wished to comment on the proposed rules and were informed of the procedures for taking comments. They also were told that the hearing would be recorded.

Before receiving comment, there was an informal opportunity for the attendees to raise questions about the proposed rules and hearing officers Tim Holschbach and Peter Brewer, ODF and DEQ staff provided answers to the questions. Once questions were answered, Ray Guse, a private prescribed fire consultant, provided the only testimony. His comments are summarized below.

**Summary of Oral Comments – La Grande**

Ray Guse: Mr. Guse's comments expressed a desire for programs initiated by ODF, with the objective to reach private landowners and provide them with support and information on burning their own lands. Mr. Guse commented that he is supportive of the two agencies working together, and he is encouraged that they are also working with the State of Washington DNR. Mr. Guse did not specify which department his comments were directed toward.

There were no additional comments. The hearing was adjourned at 8:30 p.m.

### **Bend Hearing, August 22, 2018, at 7:00 p.m.**

There were 29 attendees at the public hearing in Bend. Prior to the hearing, Michael Orman from the Department of Environmental Quality (DEQ) and Nick Yonker from the Oregon Department of Forestry (ODF) provided a joint PowerPoint presentation on the background and operations of the Smoke Management program and proposed changes to the Oregon Smoke Management Plan.

The rulemaking hearing on the proposed rules was convened. People were asked to sign registration forms if they wished to comment on the proposed rules and were informed of the procedures for taking comments and submitting written comments. They were also told that the hearing would be recorded.

Before receiving comment, there was an informal opportunity for the attendees to raise questions about the proposed rules and hearing officers Tim Holschbach and Peter Brewer, ODF and DEQ staff provided answers to the questions. Once questions were answered, the following individuals provided verbal comment: Joe Stutler, with the Western Regional Strategy Committee (WRSC); Marilyn Miller, with Miller Conservation Consulting; Bend City Councilor Sally Russell, on the behalf of the Deschutes Collaborative Forest Project and the Bend City Council; Roger Johnson, Fire Chief of the Sisters-Camp Sherman Fire District; Commissioner Phil Henderson, representing Deschutes County; Keith Windsor, with the Central Oregon Smoke and Public Health Collaborative; Ray Miao, President of the Deschutes County Rural Fire Protection District No. 2; Ed Keith, Deschutes County Forester, also representing as vice chair of the Deschutes Collaborative Forest Project; Commissioner Anthony DeBone, on the behalf of Deschutes County; Pete Caligiun, a Forest Ecologist representing The Nature Conservancy (TNC) in Bend; Nicole Strong, an extension forester with Oregon State University; Melanie Fisher, representing the Central Oregon Trail Association (COTA), and the Cog Wild Mountain Bike Company, and Erik Fernandez, Wilderness Program Manager with Oregon Wild. Their comments are summarized below.

#### **Summary of Oral Comments – Bend**

Joe Stutler: Mr. Stutler, on the behalf of the Western Regional Strategy Committee (WRSC), supports the proposed rules and supports an exemption to the one-hour smoke threshold. Comments were directed toward both agencies.

Marilyn Miller: Ms. Miller, on the behalf of Miller Conservation Consulting, commented that they support the exemption to the one-hour smoke intrusion threshold so that additional burn days can be added. She commented that Deschutes County has 9-10 burn days per year, and they are backlogged approximately one hundred thousand acres. Comments were directed toward both agencies.

Sally Russell: Councilor Russell, on the behalf of the Deschutes Kalamata Forest Project, and the Bend City Council, appreciates the rule revision and is encouraged by an effort to

better align Oregon with the National Ambient Air Quality Standards. She commented that they are concerned about the proposed one-hour smoke threshold, and stated that their support is contingent on the inclusion of a realistic exemption to the smoke threshold for communities that have developed and implemented a smoke mitigation plan. Councilor Russell did not specify which department her comments were directed toward.

Roger Johnson: Mr. Johnson, on the behalf of the Sisters-Camp Sherman Fire District, commented that the district supports the changes to the rules. He also commented that they were concerned that the one-hour threshold would limit the amount of prescribed burns in the most critical areas. Overall, they support the proposed rules, but encourage both agencies to provide more flexibility to the one-hour threshold. Comments were directed toward both agencies.

Phil Henderson: Commissioner Henderson, on the behalf of Deschutes County, commented that they support an exemption to the one-hour threshold, and also expressed that although they are grateful for ODF and DEQ working at the edges, they stated that Deschutes County has had eight weeks of oppressive smoke, and helping prevent larger fires is a bigger priority than pure air. Comments were directed toward both agencies.

Keith Windsor: Mr. Windsor, on the behalf of the Central Oregon Smoke and Public Health Collaborative, commented that prescribed fire smoke is significantly less toxic than forest fire smoke, and that they would like ODF and DEQ to provide an exemption to Central Oregon of the one-hour smoke threshold for prescribed burns. Comments were directed toward both agencies.

Ray Miao: Mr. Miao, on the behalf of the Deschutes County Rural Fire Protection District No. 2, and the Fire Safety Committee for the Woodside Ranch Homeowner's Association, commented that the Fire Protection District board has already sent letters to each agency. In these letters and comments, they express support for the Oregon Smoke Plan amendments, excluding the one-hour smoke threshold. Mr. Miao stated that they support any amendments that allow more prescribed burns in the area, and that they appreciate receiving a notification of prescribed burns when they occur. Comments were directed toward both agencies.

Ed Keith: Mr. Keith, as the Deschutes County Forester and Vice Chair for the Deschutes Collaborative Forest Project, requests a better alignment for intrusions regarding the Clean Air Act, and flexibility for prescribed burning. He is supportive of the alignment with the seventy-five percent buffer and Ambient National Air Quality Standards, but does not support the one-hour smoke threshold. Mr. Keith commented that the one-hour threshold should not be included in the final ruling. If the one-hour threshold is included, Mr. Keith requests that a public notification system be implemented, and that the exemption process be made clearer for at-risk communities. Comments were directed toward both agencies.

Anthony DeBone: Commissioner DeBone, on the behalf of Deschutes County, commented that they support the new rules in alignment with the National Ambient Air Quality Standards, but not the one-hour threshold. Commissioner DeBone supports the exemption process if the one-hour smoke threshold is implemented.

Pete Caligiun: Mr. Caligiun, on the behalf of The Nature Conservancy (TNC) based out of Bend, Oregon, commented that they support the use of a buffer below the 75 percent National Ambient Air Quality Standard, however, they have concerns about the one-hour threshold. Mr. Caligiun hopes that through forest thinning and prescribed burning, ODF and DEQ will choose a more balanced answer. Mr. Caligiun did not specify which department his comments were directed toward.

Nicole Strong: Ms. Strong, as an Extension Forester with Oregon State University, commented that she appreciates the revision and supports the alignment of the smoke rules with the National Ambient Air Quality Standards, however, she has severe concerns about the one-hour threshold on prescribed burns. Ms. Strong commented that if the one-hour threshold remains, she requests that an exemption process be outlined with it. Comments were directed toward both agencies.

Melanie Fisher: Ms. Fisher, on the behalf of the Central Oregon Trail Association (COTA), and the Cog Wild Mountain Biking Company, supports the changes to the smoke management rules, as long as it allows the provision for exemptions to the one-hour threshold. She commented that as a previous business owner, prescribed burns do not affect their economy as much as wildfire does. Ms. Fisher did not specify which department her comments were directed toward.

Erik Fernandez: Mr. Fernandez, with Oregon Wild, commented that he would urge the ODF and DEQ to reconsider allowing the burning of more plastic sheets, and that increased flexibility is just tinkering around the edge of 100 years of fire suppression. Comments were directed toward both agencies.

There were no additional comments from participants who were calling in. The hearing was adjourned at 8:50 p.m.

### **Klamath Falls Hearing, August 23, 2018, at 7:00 p.m.**

There were 11 attendees at the public hearing in Klamath Falls. Prior to the hearing, Michael Orman from the Department of Environmental Quality (DEQ) and Nick Yonker from the Oregon Department of Forestry (ODF) provided a joint PowerPoint presentation on the background and operations of the Smoke Management program and proposed changes to the Oregon Smoke Management Plan.

The rulemaking hearing on the proposed rules was convened. People were asked to sign registration forms if they wished to comment on the proposed rules and were informed of the procedures for taking comments and submitting written comments. They were also told that the hearing would be recorded.

Before receiving comment, there was an informal opportunity for the attendees to raise questions about the proposed rules and hearing officers Tim Holschbach and Peter Brewer, ODF and DEQ staff provided answers to the questions. Once questions were answered, Daniel Leavell of the Oregon State University College of Forestry, and Craig Bienz, with the Nature Conservancy (TNC), provided comment.

### **Summary of Oral Comments – Klamath Falls**

Daniel Leavell: Mr. Leavell, with the Oregon State University College of Forestry, and as the Fire Agent for the Forestry Natural Resources Extension, commented that he believes the corrections DEQ and ODF have made are sound, however, he wanted to endorse a letter submitted by the Nature Conservancy on August 16, by Mark Stern, a valued partner: They agree with the revisions up to the one-hour threshold, and request that exemptions be available. Other recommendations Mr. Leavell had was that if there is a health-based standard ODF and DEQ are using, to ensure that the metrics used are monitored so that the correct information can be given to the affected communities, and partnering with Public Health and designating an authority for this task, so that there's a point of contact and increased accountability. Mr. Leavell did not specify which department his comments were directed toward.

Craig Bienz: Mr. Bienz, with the Nature Conservancy, commented that they have been working with the Klamath Lake Health Partnership, and other collaboratives throughout the state. Mr. Bienz expressed support for the rules, providing that the proposed exemptions from the prescribed burns be maintained into the final ruling. He would also like the final rule to outline a clear process with specific measurable criteria for communities to be engaged and involved. Comments were directed toward both agencies.

There were no additional comments. The hearing was adjourned at 8:26 p.m.

### **Eugene Hearing, August 28, 2018, 7:00 pm**

There were 16 attendees at the public hearing in Eugene. Prior to the hearing, Michael Orman from the Department of Environmental Quality (DEQ) and Nick Yonker from the Oregon Department of Forestry (ODF) provided a joint PowerPoint presentation on the background and operations of the Smoke Management program and proposed changes to the Oregon Smoke Management Plan.

The rulemaking hearing on the proposed rules was convened. People were asked to sign registration forms if they wished to comment on the proposed rules and were informed of the procedures for taking comments and submitting written comments. They were also told that the hearing would be recorded.

Before receiving comment, there was an informal opportunity for the attendees to raise questions about the proposed rules and hearing officers Tim Holschbach and Peter Brewer, ODF and DEQ staff provided answers to the questions. Once questions were

answered, the following individuals provided verbal comment: David Stone, a resident of Eugene, Oregon; Dave Cramsey, Forestry Manager for Roseburg Forest Products; Kyle Williams, representing the Oregon Forest and Industries Council (OFIC); Kirsten Aird, representing the Oregon Health Authority, Public Health Division; Ted Reiss, a professional forester and resident of Eugene, Oregon; Amanda Stamper, with the Oregon Prescribed Fire Council; Merlyn Hough, with the Lane Regional Air Protection Agency, and Reilly Newman, a resident of Cottage Grove, Oregon.

### **Summary of Oral Comments – Eugene**

David Stone: Mr. Stone, a resident of Eugene, Oregon, suggested some tools to minimize smoke in Oregon: Controlled burns, restoration thinning to remove smaller, fire-prone trees, and diverting funds to controlled burns and restoration projects. Mr. Stone recommends off-season burns, which would provide a stable year-round workforce, saving turnover, and employment costs. Mr. Stone also advocates for building codes to enforce fire-safe construction in urban locations. Comments were directed toward both agencies.

Dave Cramsey: Mr. Cramsey, as Forestry Manager for Roseburg Forest Products, will submit written comments prior to September 14, but he wanted to extend his gratitude to ODF and DEQ. He commented that although convincing people to allow smoke into the communities was going to be difficult, they realize it is a trade-off and that there are long-term benefits to the situation. Mr. Cramsey did not specify which department his comments were directed toward.

Kyle Williams: Mr. Williams, as Director of Forest Protection for the Oregon Forest and Industries Council (OFIC), commented that they support most of the changes, and are thankful for the new language in the rules. The OFIC would like to voice support for allowing expanded use of polyethylene covers for an emission-reduction technique. The burn piles with these covers showed reduced emissions and increased burn productivity. The OFIC will be submitting additional written comments. Comments were directed toward both agencies.

Kirsten Aird: Ms. Aird, on the behalf of the Oregon Health Authority, Public Health Division, read from a statement signed by the Public Health Director. OHA commented that the Health Authority prefers the rules as they stand, but under Oregon's changing climate, they accept the proposed rules as drafted. The OHA also commented that the one-hour burn threshold is very important to them. Anything revising this threshold would be a deal breaker. They suggest one change: a permit process, rather than an exemption, in the hope that this will make individuals seeking an exemption understand that they are letting more smoke into their community. OHA stated that they would provide advice to both agencies during this process. Ms. Aird did not explicitly specify which department her comments were directed toward.

Ted Reiss: Mr. Reiss, a professional forester and resident of Eugene, commented that he strongly supports the changes as proposed. He stated that ODF and DEQ need to be clear

about this being a small step forward, and they need to understand that this is not going to change the problem overnight. Comments were directed toward both agencies.

Amanda Stamper: Ms. Stamper, on the behalf of the Oregon Prescribed Fire Council, commented that they acknowledge the rules should address the safety of the public in both wild and prescribed burns. They support the plan moving forward, but express concern at the limiting of prescribed burns. Ms. Stamper states that they would like more communication with the public for prescribed burns, and they support exemptions to the one-hour threshold. Comments were directed toward both agencies.

Merlyn Hough: Mr. Hough, on the behalf of the Lane Regional Air Protection Agency, commented that although they are concerned about air quality due to prescribed and wild burns, they recognize the need for an amendment to the rules. Mr. Hough recommended the following options to consider for smoke reduction strategies: increased use of polyethylene sheeting, increased biomass utilization of forest slash piles to reduce the amount burned in the forest, and the use of auxiliary combustion enhancement equipment to reduce smoke. Mr. Hough stated that this would communicate to the public that additional efforts were being made to control and reduce smoke. Comments were directed toward both agencies.

Reilly Newman: Ms. Newman, a resident of Cottage Grove, Oregon, comments that she supports the rules and changes as proposed, and hopes that ODF and DEQ can provide more prescribed burns for fuel reduction. Comments were directed toward both agencies.

There were no additional comments. The hearing was adjourned at 8:23 p.m.

### **Medford Hearing, August 29, 2018, at 7:00 p.m.**

There were 112 attendees at the public hearing in Medford. Prior to the hearing, Michael Orman from the Department of Environmental Quality (DEQ) and Nick Yonker from the Oregon Department of Forestry (ODF) provided a joint PowerPoint presentation on the background and operations of the Smoke Management program and proposed changes to the Oregon Smoke Management Plan.

The rulemaking hearing on the proposed rules was convened. People were asked to sign registration forms if they wished to comment on the proposed rules and were informed of the procedures for taking comments and submitting written comments. They were also told that the hearing would be recorded.

Before receiving comment, there was an informal opportunity for the attendees to raise questions about the proposed rules and hearing officers Tim Holschbach and Peter Brewer, ODF and DEQ staff provided answers to the questions. Once questions were answered, the following individuals provided verbal comment: Kathleen Page, a resident of Southern Oregon; Joseph Rice, on the behalf of the Josephine County Republican Party Vice Chairman; Chris Chambers, the Forest Division Chief at Ashland Fire and Rescue; Alan Journet, on the behalf of the Southern Oregon Climate Action; Jack

Shipley, a resident of Josephine County; Brodia Minter, an employee of KS Wild; Ronald Rothrock Jr., a resident of Medford, Oregon; John Stromberg, Mayor of Ashland, and worker on the Ashland Forest Resilience Program; Sarah Wallan, a resident of Medford, Oregon; Saman Maknovni, a resident of Medford, Oregon; Hiram Towll, on the behalf of the Ashland Ski Area; Terry Fairbanks, representing the Southern Oregon Restoration Collaborative; Darren Borgias, on the behalf of the Nature Conservancy, and Ted Bennion, a resident of Medford, Oregon.

### **Summary of Oral Comments – Medford**

Kathleen Page: Ms. Page, a resident of Southern Oregon, commented that she is tired of wildfires and that she would like tree thinning and a science-based approach to this matter. Ms. Page also stressed the community needs to see that fire-fighting efforts are working, and they want more accountability from ODF and DEQ. Ms. Page also commented that most activity is being done on private forestlands, and she wants to know if there is a way to involve federal landowners as well. Ms. Page did not specify which department her comments were directed toward.

Joseph Rice: Mr. Rice, Josephine County Republican Party Vice Chair, commented that there needs to be a clear and defined objective to what this program does, and that it should be driven by that objective. Mr. Rice stressed that Medford has been heavily affected by the loss of tourism, as this is their fifth year in a row of heavy smoke. Mr. Rice also commented that the body needs to be meeting every two and a half years, instead of five, and that hearings should also be held in Josephine and Douglas County. Mr. Rice did not specify which department his comments were directed toward.

Chris Chambers: Fire Chief Chambers, on the behalf of Ashland Fire and Rescue, commented that he would like the committee to remove the one-hour threshold, since it was not a decision from the review committee. Chief Chambers did not specify which department his comments were directed toward.

Alan Journet: Mr. Journet, on the behalf of Southern Oregon Climate Action, commented that he is in support of an increase of prescribed fires. He also commented that Mediterranean climates are fire-prone, fire-adaptive, and fire-reliant. Mr. Journet did not specify which department his comments were directed toward.

Jack Shipley: Mr. Shipley, on the behalf of the Applegate Partnership and Watergate council, and the chair of the Southern Oregon Chapter of the Prescribed Fire Council, commented that his family used prescribed fire a year ago in the spring to burn the upper 40 acres of their property. They are at a high risk for forest fires, since they are surrounded by the BLM on all four sides. Mr. Shipley commented that they support the revision to the proposed rule, providing that communities can obtain an exception to the one-hour smoke threshold. They would prefer to remove the one-hour threshold completely, and follow the EPA's standards for air quality. Mr. Shipley also supports the use of thinning forest properties. Mr. Shipley did not specify which department his comments were directed toward.



Brodia Minter: Ms. Minter, an employee of KS Wild, representing her own thoughts, commented concern about the one-hour threshold and believes it will impose unnecessary restrictions. Ms. Minter requests that ODF funds more fire research and utilizes fire crews in the off-season to burn landscapes that are dependent on fire. She also comments that ODF should ensure that private forest practices do not increase fire hazards, that a community response protection plan be outlined, that they should limit clearcutting, and encourage the production of more Biochar systems as an alternative to thinning. Ms. Minter additionally expressed that she would like to see ODF and DEQ encourage using Kraft paper as an alternative to burning polyethylene. Ms. Minter supports the agency's alignment of smoke management rules with the National Ambient Air Quality Standards. Comments were directed toward both agencies.

Ronald Rothrock Jr.: Mr. Rothrock, a resident of Medford, commented that he is against increasing any controlled burns in the off-seasons. Mr. Rothrock commented that smoke during off-seasons will make it less recreationally appealing, that it is not appropriate, and that residents are not prepared for it. He commented that he supports non-fire methods of clearing, and also encourages more public advertising for these meetings. The only reason he was present, was because a local radio station mentioned it. Mr. Rothrock did not specify which department his comments were directed toward.

John Stromberg: Mr. Stromberg, Mayor of Ashland and working on the Ashland Forest Resiliency Program, commented that the issues with controlled burns is that they have not been able to keep up with the growth of new fuels. Mr. Stromberg stated that ODF and DEQ need to keep working on the changes in the rules, and that the one-hour threshold was created in an arbitrary way, even if they are seeking to protect vulnerable populations. Mr. Stromberg commented that applying this regulation earlier would have meant overall less controlled burning instead of more. He recommends that there be an exemption to the one-hour threshold. Mr. Stromberg did not specify which department his comments were directed toward.

Sarah Wallan: Ms. Wallan, a resident of Medford, Oregon; stated that she has severe asthma which is heavily affected by smoke, and is a member of at-risk populations in Oregon. Ms. Wallan commented to say that ODF and DEQ should do as much prescribed burning as possible, even though she is grateful for the plan to revise the rules. Ms. Wallan did not specify which department her comments were directed toward.

Saman Maknovni: Mr. Maknovni, a resident of Medford, Oregon; commented that he believes the first policy that DEQ and ODF should implement is to allow free-range grazing for farm animals, and to let everyone pick out a dead stick from the forests. Mr. Maknovni stated that private properties should do controlled burns, but that he does not believe public lands should. He does not want these prescribed burns controlling or impeding their way of life. Mr. Maknovni also commented that the one-hour threshold should be thrown out, and that he is supportive of controlled burns. Mr. Maknovni did not specify which department his comments were directed toward.

Hiram Towll: Mr. Towll, on the behalf of the Ashland Ski Area, commented that he is supportive of the twenty-four hour standard, not the one-hour threshold. Mr. Towll commented that he would like to see ODF, DEQ, and the surrounding communities embrace fire and use it as a tool to make the forests more resilient. Mr. Towll did not specify which department his comments were directed toward.

Terry Fairbanks: Ms. Fairbanks, on the behalf of the Southern Oregon Restoration Collaborative, commented that if ODF and DEQ does increase prescribed burning, that they should work with communities to prepare them. Ms. Fairbanks supports the alignment with the National Ambient Air Quality Standards, but is concerned about the one-hour threshold. Ms. Fairbanks did not specify which department her comments were directed toward.

Darren Borgias: Mr. Borgias, on the behalf of the Nature Conservancy, commented that they appreciate the work done by ODF and DEQ, and they support the proposed rules and seventy-five percent buffer in alignment with the air quality standards, however, they have significant concerns with the one-hour threshold, since it restricts communities' ability to burn. Mr. Borgias commented that the Nature Conservancy's support for the proposed rules and one-hour threshold is subject to opportunities for communities to obtain exemptions to the threshold, given local resources and capacities. Mr. Borgias did not specify which department his comments were directed toward.

Ted Bennion: Mr. Bennion, a resident of Medford, Oregon; did not complete a comment card. Mr. Bennion commented that he has been hearing many stories about the US Forest Service and ODF showing minimal cooperation, and rejecting offers from civilians to assist with putting small, local fires out. Mr. Bennion commented that he does not support allowing fires to burn, when they could be stopped. He requested that ODF make a statement on their policies regarding forest fires, and that they make it very clear to the affected communities. Mr. Bennion did not specify which department his comments were directed toward.

Three individuals filled out comment cards but were not present at the time to comment. One individual also declined to comment when their name was called.

### **Summary of Written Comments – Medford**

Ron Sherva: Mr. Sherva commented to manage our forests and log appropriately and we wouldn't have fire problems.

John Bergendahl: Mr. Bergendahl, a citizen of Medford, stated the balance between controlled burning and commercial logging is his concern. How much commercial interest is expected to harvest timber and slash for biofuels, etc.?

The hearing was adjourned at 9:25 p.m.

**The public comment period closed at 5:00 p.m. on September 14, 2018.**

## **Comment Analysis**

### **Re: Proposed Rules for the Oregon Smoke Management Plan**

174 people attended the five public hearing. 74 people provided comment on the proposed administrative rules regarding the Oregon Smoke Management Plan through the formal rule hearing process, 36 comments being written and 38 comments presented orally. Comments were overwhelmingly in support for a general increase in prescribed burning, 56 for, and 2 against.

No comments presented indicated a negative economic impact on business.

In the text below, the hearing officer has provided summary of the comments received in regards to the rules presented before the Board of Forestry.

**629-048-0005 (27)** – 35 comments were submitted in support of the changes to the definition of “smoke intrusion,” zero were submitted against.

**629-048-0005 (27)** – 38 comments were provided against the one-hour smoke intrusion threshold, zero were submitted for.

**629-048-0180 (3)** - 38 comments were provided for an exemption process for the one-hour smoke intrusion threshold, zero were submitted against having an exemption process.

**629-048-0180** – 16 comments were provided in support of increased outreach and communication, zero were submitted against.

**629-048-0210 (4)** – Six comments were submitted in support of increased allowance in the use of polyethylene sheeting to cover piles to be burned. Two comments were provided against the increased allowance.

Hearing Officer’s response – ODF has conducted studies, which have shown that burning of polyethylene sheeting does not increase pollutants any more so than the woody material being burned. Polyethylene sheeting allows piles to remain drier, facilitating better combustion conditions for a more complete burn, reducing emissions.