

## **Comments on the proposed Smoke Management Rules**

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Good afternoon. My name is David Cramsey. I am the District Forester for the Vaughn Area of Roseburg Forest Products. I appreciate this opportunity to discuss the proposed changes to the smoke management rules. I have tracked this review process with great interest since it started in 2002, worked directly with representatives of the committee and have most recently been involved with a group of "on the ground" foresters reviewing the proposed rule. In my opinion, the rule as presented WILL have negative, unintended consequences on our forests and communities. .

The department has done a good job of explaining the necessity of prescribed burning in the proposed rule as relates to landscape level fuels and ecosystem mgmt. The benefits of a well managed fuel reduction program have been evident on Roseburg Forest Products lands over the past several years. We have some real life examples where the judicious use of slash burning reduced the spread of wild fire and the resulting accumulations of smoke in communities.

In August 2002, the Siuslaw Fire in western Lane County started at a dispersed recreation site on BLM lands. This wind driven fire spread quickly from BLM lands onto RFP lands through both a flaming front and heavy spotting upwards of 1 mile ahead of the main fire. The spread of the fire was arrested by a lack of fuels in young forests that had been treated with broadcast burning, prior to stand establishment.

In the summer of 2005 a lightning strike holdover started the Big Creek fire. This fire crept out of the timber into a harvested area that had not been burned. The fire quickly involved the majority of the unit. In spite of both short and long range spotting potential, fire crews were able to contain the fire at the perimeter of the harvest unit because adjacent lands had been burned.

In these cases and many others, slash burning significantly reduced the number of acres burned by wildfire. The reduction in the spread of these wildland fires reduced suppression costs, reduced the volume of smoke put into nearby communities at a time of year when air quality is already compromised, reduced losses of valuable trees and wildlife habitat and improved safety for fire fighters and the people who live in rural areas.

I mention these incidents because it is critical that we remember the goal of the program is to manage smoke. Our ability to actively manage forest fuels is critical towards

achieving the goal of maintaining air quality throughout the year, as well as the myriad of benefits that are derived by effective fire protection.

Rules and regulations that inevitably reduce the opportunity to burn or increase the cost of burning will force landowners to reduce their efforts in managing forest fuels with prescribed fire. This is not in the public's best interest as it will increase costs of wildfire suppression, increase the frequency and volume of unmanaged smoke entering communities and cause landowners to place further restrictions on public use in an effort to reduce opportunities for fires to start.

The current smoke management program has been successful. Several of the proposed regulations may have significant unintended consequences. I would like to share those with you.

#### SSRAs

The creation of any new Smoke Sensitive Receptor Areas, without quantified evidence of an air quality impairment directly attributed to forest burning, will greatly compromise the accomplishment goal of the program with no benefit to air quality of that community. I support the alternative set of criteria for the creation of new SSRAs presented by OFIC and request that they be incorporated into the draft rule prior to the start of the formal rulemaking process.

#### FEE STRUCTURE

Funding of the Smoke Management Program continues to be unresolved. To date, the potential funding scenarios presented cover the range from minimal increases to a near doubling of burn fees for our lands. Funding of the program and subsequent 'rate setting' should be resolved before the rule making process begins.

The current, interim pile burning guidance maintains the incentive to reduce forest fuels through increased utilization and hazard abatement. This incentive is eliminated with the proposed fee structure. Under the proposal there are many situations where it could cost hundreds of dollars to burn the landing piles on an individual harvest unit. I am concerned that some landowners will stop burning because of the high financial costs. This will result in an increase of fire hazards on the landscape and put increasing financial pressure on those who continue to burn to support the program.

We do recognize the benefits that the smoke management program provides. All beneficiaries of the program should contribute for it to remain viable. Private, state and federal burners on both sides of the Cascade Range as well as the public need to participate in the funding as all receive benefits from the services provided. I urge that funding considerations be approached cautiously to ensure that they promote a stable program free of unintended consequences and that allows all stakeholders to equitably contribute towards the success of the program.

In closing, I would like to thank you for the opportunity to speak to you today and express my appreciation for your thorough review of the proposal to eliminate any unintended consequences.