



June 5, 2007

Stephen D. Hobbs, Chair  
Oregon Board of Forestry  
2600 State Street  
Salem, OR 97310

Dear Mr. Hobbs:

I want to thank the Oregon Department of Forestry and partner agencies for the very informative forestry tour provided for the Environmental Quality Commissioners and other participants on April 19, 2007. The tour was very helpful for better understanding forest health issues, the role of prescribed burning in ecosystem management, forest management practices, and biomass utilization alternatives.

The next day at the EQC meeting, the staff presentations by the Department of Forestry and Department of Environmental Quality were also very informative. During the public participation session of the meeting, I provided testimony to the Commissioners (and Board of Forestry member Barbara Craig, who was also present) supporting the addition of the city of Florence as a smoke-sensitive receptor area (SSRA) in the Oregon Smoke Management Plan.

I have several reasons for supporting the addition of Florence.

**The population of Florence is growing rapidly and is within the population range of other coastal cities that currently receive special protection designation from the Board of Forestry.** Florence has a 2006 population of 8,270. Coastal cities currently with special smoke protection designations (and their 2006 populations) include Tillamook (4,675), Lincoln City (7,615), North Bend (9,720), Astoria (9,970), Newport (10,240) and Coos Bay (16,005). Tourism is an important industry in all of these coastal cities. These communities are typically located at the outflow of a river with adjacent mountainous terrain that can combine to trap and funnel smoke into the cities.

**LRAPA, ODF and DEQ receive numerous complaints of smoke intrusions into the Florence area.** For example, several smoke intrusions into Florence were documented during November 2004 through April 2005. LRAPA received 23 smoke complaints on these days.

**Slash smoke appears to be a significant contributor to these intrusions.** For example, for the smoke intrusions during November 2004 through April 2005, a joint evaluation by ODF, LRAPA and DEQ staff concluded that slash burning contributed to the smoke intrusions on at

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least three of these days, including the heaviest smoke impact that occurred on February 23, 2005 and resulted in the single greatest daily number of complaints (8 of the 23).

**SSRA-designation by the Board of Forestry would be a key complement to other recent smoke management improvements by the city of Florence and LRAPA.** In 2005, Florence adopted a ban on open burning within the city limits and LRAPA initiated a daily open burning advisory for coastal Lane County. LRAPA is proposing a special control area for open burning in the Siuslaw Rural Fire Protection District surrounding Florence for adoption by the LRAPA Board this Fall; these special control area requirements will more strictly regulate land clearing burning.

Based on the population growth in Florence and smoke events in recent years, I believe that Florence residents should have the same protections as other similarly populated areas along the coast. Thank you very much for your consideration.

If you have questions regarding these concerns, please call me at (541) 736-1056, ext. 216. I would be happy to discuss this in more detail.

And thank you again for making possible the very informative tour and presentations on April 19-20, 2007. We greatly value our partnerships with DEQ and ODF.

Sincerely,



Merlyn Hough  
Director  
Lane Regional Air Protection Agency

cc Members of the Oregon Board of Forestry  
Marvin Brown, State Forester  
Paul Bell, Assistant State Forester  
Rick Rogers, Western Lane District Forester

From: Ben Groesbeck [mailto:bengroes@oregonfast.net]  
Sent: Sunday, June 03, 2007 8:31 AM  
To: STONE Charlie H  
Subject: Smoke Free

As a resident of Florence I would like to take this opportunity to convey my concerns regarding the smoke that often intrudes into our city from Logging Slash Burns. I understand that the June 6th meeting will be addressing this problem. What is being done to bring an end to this?

I would like to see a change in ruling to keep the smoke away from the city.

Thank you,  
Ben and Bette Groesbeck

Between the Mountains and the Sea

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**From:** Roy & Mary Jane Hite [mailto:rdbythesea@msn.com]  
**Sent:** Sunday, June 03, 2007 8:20 AM  
**To:** STONE Charlie H  
**Subject:** Public Coimment for June 6th...Board of Forestry Meeting

***Perhaps there can be a change in ruling and Florence can be designated an SSRA! I am in favor of keeping the slash burning smoke away from Florence. Eliminate the slash burning smoke!!!!***

***Mary Jane Hite  
Resident of Florence***

I would like to submit the following public comment regarding Florence and the ODF regulated burns causing dangerous smoke intrusions for smoke sensitive individuals into our area.

As you are aware this issue regarding the Florence area has captured much attention and involved many agencies. When initial complaints began, we the concerned and affected individuals were directed by ODF employees to seek out other sources that could be causing these intrusions. We were instructed that the first step toward helping our situation was to eliminate all other sources of smoke. ODF would take no responsibility for their part in this ongoing problem. Through the efforts of our enlightened City Manager and City Council a burn ban was passed for inside the city limits. Much dialogue ensued with LRAPA and over a period of time they have implement many practices to eliminate and reduce the amount of smoke generated by burns under their jurisdiction. Now with these safeguards in place, we still experience smoke intrusions from slash burns under the jurisdiction of the ODF which cause bronchial inflammation, coughing, burning eyes, difficulty breathing, headaches and lasting allergic reactions. It is mandatory that ODF now accept their responsibility and spend their time and resources to seek an immediate solution to this serious issue rather than continue to spend precious time and energy on attempting to place blame on other sources. This is a delay tactic that has resulted in this issue not being addressed in a timely manner. I has been over two and half years since the original complaints.

I respectfully request that Florence be given the status of an SSRA. In addition please consider than any slash caused by logging or clearing within a sufficient buffer zone surrounding Florence be chipped rather than burned. The health of our citizens should be first and of foremost importance.

Sincerely,  
Stephanie Oman  
Florence, OR

**From:** Lee Oman [yycreations@hotmail.com]  
**Sent:** Tuesday, June 05, 2007 3:17 PM  
**To:** Kim Metzler, LRAPA PA; STONE Charlie H; NICHOLS Rod L; POSTREL Dan; FINNERAN Brian; DECONCINI Nina  
**Subject:** Request for Florence to be designated an SSRA

*To Whom It May Concern:*

*Please submit my comments for the June 6th BOF meeting .*

*I would like to submit a request for the city of Florence to be designated an SSRA to protect the lives of the local residents who are, for the most part, retired individuals who have more sensitive respiratory systems than in some areas. I was born and raised in Oregon and it seems the smoke impacts resulting from slash burning are much more severe than ever before. We moved to the Florence area in 1989 and very seldom had any problems with smoke. It appears the ODF has tried to blame every impact on other sources of burning.*

*In reference to the Oregon Department of Forestry's investigation of the smoke complaints in November of 2004, the investigation showed 2 burns across the river from Florence, one on November 8th and the other on November 16. What the report failed to convey was that both of these burns lasted for several days and were allowed to burn overnight at which time the city of Florence was inundated with smoke. During some of these days there was drizzle that exacerbated the smoke impact. The report also stated that ODF personnel in Florence reported that the smoke was light. I personally talked to Doug in the Florence ODF office and he agreed that the smoke was a problem but that he would not shut the burn down as he had no control to do so. On the 19th my wife and I then started a dialog with Rick Rogers in the Venita office. He reported that even though Doug in the Florence Office agreed that the conditions where not right for a burn that the ODF Meteorologists in Salem said it was; and they followed their approval of burn conditions. It was our understanding the ODF personnel at the site made the final determination. I even called one of the ODF meteorologist in Salem explaining that the conditions were causing a severe smoke intrusion into the Florence area. He stated that they sometimes had difficulty predicting conditions on the Coast. After several more conversations with Rick he asked us what we wanted him to do and we stated that a week or two with no burning would give the smoke time to dissipate so smoke sensitive individuals could recuperate somewhat. He called us back and reported that he had spoken with Davidson Industries and that they would not burn any more for 2 weeks. The following day the burn was allowed to smolder all day with the smoke coming into Florence. The next day there was no burn but unbelievably on the next day they started burning again! During this time a contractor burned where he had cleaned off some building lots by the Florence Police Station. Unlike dismissing our plea for help and assistance from the ODF, the local fire chief immediately went to the site and shut the*