

Public Testimony

12/01/20

Public Testimony #1

It's time for a cold, clear look at what the Ashland "Forest Resiliency Project" is doing for us, and to us.

How much smoke in the valley?

For the last several years, as we have been subjected to an aggressive propaganda campaign promoting "good fire", this prescribed forest burning has filled the Rogue Valley with unhealthy smoke.

Between the incidents of wildfire and deliberate burns, Ashland is left with shockingly short periods of clean air – if you judge by current, direct measurements rather than those averaged or otherwise manipulated.

If your source for air quality information is the EPA AirNow program, you may be surprised by the particulate (smoke) focused real time data on

PurpleAir: <https://www.purpleair.com/map?opt=1/mAQI/a10/cC0#12.81/42.17035/-122.69127>

As I write this, EPA's AirNow shows 22.8 ug/m3 PM2.5, and PurpleAir, 125 ug/m3 PM2.5.

EPA explains its reporting algorithm in this

manner: https://usepa.servicenowservices.com/airnow?id=kb_article_view&sys_id=fed0037b1b62545040a1a7dbe54bcd4

I will continue to check PurpleAir for up to date smoke conditions before spending time outdoors.

State of Oregon sets a more protective standard

In 2019 Oregon revised its standard for fine particulate matter, also called PM2.5. to protect human health by limiting smoke from controlled fires to a one-hour threshold at or above 70 micrograms per cubic meter (ug/m3) and a 24-hour average at or above 26 ug/m3, measured midnight to midnight on the first day of smoke entrance into a community.

"Even brief exposures to smoke can cause health problems for persons with asthma, emphysema, congestive heart disease and other existing medical conditions. People who are elderly, pregnant and young children are especially high-risk groups. Smoke from forest burning also affects visibility in national parks and wilderness areas, as well as general outdoor recreation activities."

- https://www.oregon.gov/deq/EQCdocs/ItemB_SmokeMgmtRules_Jan2019.pdf

Ashland is asking for an exemption

While the state rule does allow for a locality with a "community response plan" to request an exemption to the one-hour intrusion threshold through their local governing body and County Commission, is an exemption in Ashland's best interest?

Ashland's Community Response Plan relies almost exclusively on notifications. It assumes that people will stay inside with windows closed. But notification isn't the same as protection: not all residents or visitors will have advanced or HEPA systems and homes tight enough to keep smoke out, if they have homes at all. This is a critical environmental justice concern, as it is for people who must work outside and people who lack personal transportation.

2020 presents special risks. The Almeda fire displaced many families and individuals, some of whom are living in substandard housing without adequate HVAC. All Rogue Valley residents have been subjected to long periods of heavy smoke, much of it the toxic products of asbestos, metals, asphalt, pesticides, tires, PVC and other plastics, etc. Is it right to expose them to even more smoke?

Also, PM2.5 air pollution is known to exacerbate vulnerability in all populations to COVID-19, which is now spreading more rapidly than ever. Meanwhile, families with restless homebound children are counting on Ashland's outdoor spaces to provide welcome breaks and educational opportunities. People of all ages who might normally rely on gyms for exercise are walking, running and biking instead to avoid the pandemic risks of indoor facilities.

Do we have alternatives?

- Woody debris can be reduced by using chipping or mulching, greatly minimizing the smoke impacts on health and avoiding significant carbon releases to the atmosphere:

https://www.fs.fed.us/rm/pubs/rmrs_rm020_01.pdf

- Flammable brush like the invasive blackberries throughout Ashland and, until Almeda, lining the Greenway, can be controlled by goats:

<https://www.youtube.com/watch?v=jJBtmSR7Nnc>

<https://goatseatweeds.com>

- All new buildings and renovations in the Rogue Valley can and must be designed and composed of materials to resist fire. In the Almeda fire, we saw vegetation survive next to the total destruction of residential and commercial structures.

It's not worth it

In effect, an exemption to Oregon's smoke limits would increase health threats to Ashland and surrounding communities, even though there is no evidence that "good fire" leads to forest resiliency or diminishing fire risk. And while there are alternatives likely to be more effective and less damaging to our health.

I appreciate this opportunity to comment for the record.

Frances Dunham

Public Testimony #2

Greetings:

My name is Emily Simon and I am a member of lawyers for justice, an organization in the Rogue Valley that is working on and committed to obtaining racial justice in Ashland. I have presented written and oral testimony to the Council previously on these issues. Please consider this to be written testimony to support the attached speaker form as I wish to be heard tomorrow night regarding the City Council's urgent need to act, and speak out about the murder of Aidan Ellison. This brutally racist attack shows the confluence, and ultimate consequence of racial and homeless policies and priorities that must be rethought and addressed. Our outrage at this murder must be turned into soul searching and action. This murder occurred in the city of Ashland. It is time to stop saying that it can't and wouldn't happen here and address head-on that it has indeed happened here.

Attached is the form to present testimony at the city council tomorrow evening.

Please let me know that you have received this form and if there are any special instructions requiring this testimony.

Emily Simon

Public Testimony #3

We are all aware this has been a very difficult, often tragic, year with Covid, quarantines, and fires. The effects of the Alameda fire, with the devastation it caused, continues to be an issue of public concern. On top of that, we have the continuation of hazardous levels of smoke with its particulates and toxics, some from that very fire.

The Forest Resiliency Project (FRP), formed to reduce risk of future fires, relies heavily on Prescribed Burns. The project website notes that with wet weather upon us, burning could start soon and “burn days” be chosen that minimize risks to public health. Yet we have continuing high smoke numbers that keep us in the house. It refers to a “burn season” as if it was limited, but the records show that pile burns have been conducted year round. So, increasingly we have annual fires, then as soon as “fire season” ends, AFR kicks in. The official word is that we will “just have to live with it for a while” (Chris Chambers in TED Ashland).

Maybe, but now the City is being asked for an exemption from the Oregon Smoke Management Plan (SMP). I quote from Council Business Meeting presentation December 1, 2020.

Smoke impacts from prescribed fire activities regulated under the SMP must not exceed certain thresholds or are considered intrusions that require reporting, which is time-consuming and can hinder future burn opportunities. Communities that complete a Community Response Plan for Smoke (CRP) can apply for exemption to the DEQ’s one-hour smoke intrusion rule, which increase the opportunities to conduct prescribed fire in the Ashland Watershed.

That is to say, exceedances, and the pesky reporting requirements, are just burdensome impediments to seamless burning. That is to say, choosing burning over extra public exposure, is like acceptable collateral damage. Is the project is so frail that a possible minor interruption because of exceeding safe levels of smoke, that the public’s exposure should be brushed aside? That exemption request should be denied.

I rely on available monitor sites to assess the risks of being outside. Unfortunately, there are significant discrepancies among them. Some monitors give aggregate readings, some give delayed readings of up to an hour. The differences are sometimes 30 points or more, enough to put one into a more hazardous level. For vulnerable populations like seniors and those with respiratory conditions, the current reporting is not reliable. Without accurate information, people are unknowingly taking chances with their health. We have enough already. (purpleair.com has readings that update every 10 minutes, the best I’ve found).

I am aware of, and have signed up for, improved communication and warning options, but I am confused by the competing monitor numbers from the various sites. We need to have accurate, coordinated, hazard numbers that people can rely to make personal health decisions. I know public awareness is a goal of the project. I hope this issue will be addressed for the good of all.

I concur with the need to take steps to lessen the potential for catastrophic disasters such as we have seen. And I applaud measures that hope to address the risk, but the smoke limits in the State’s SMP were put there for a reason—respiratory health. To skirt them for expediency, is unacceptable.

I appreciate the opportunity to comment.

Allan Peterson