CLACKAMAS COUNTY FARM FORESTRY ASSOCIATION

POSITION PAPER

SLASH BURNING CONCERNS

It is the position of the Clackamas County Farm Forestry Association, a chapter of the Oregon Small Woodlands Association, that the present Oregon Department of Environmental Quality's (DEQ) administrative rules, covering open slash burning, be re-aligned with the total exemption for agriculture burning as originally approved under OAR 340-264-0040; specifically, that the exemption for slash burning be made the same as the rules for agricultural debris burning within the six (6) mile Open Burning Control Areas around densely populated locations within the Willamette Valley.

Our Concerns:

- Failure to remove non-commercial wood and slash from forested areas contributes greatly to the fuel load within the forest. Should fire occur the potential for catastrophic damage, especially within the more densely populated areas, is significantly increased.
- Failure to remove or burn slash, may contribute to spread of disease damaging to our forests.
- The cost of, or the logistics related to the physical removal of slash is, in most instances, prohibitive. If a property owner can find a contractor willing to remove such slash and a depository for the slash, the costs for doing so can range from 30 - 50% of net profits from a timber harvest. This cost greatly reduces potential retirement income and personal uses such as college tuition, etc.; In some instances, the terrain makes it almost impossible, for some forest owners to remove slash and debris.
- Piling of slash reduces the potential re-planting area for new replacement seedlings; typically by at least four (4) seedlings per pile. Loss of planting area has a more severe impact on smaller parcels of land. Such debris piles also provide cover for rodents which are harmful to surrounding seedlings and small trees.

Requested Actions:

- Re-establishment of slash burning exemptions within the Open Burning Control Areas.
- In lieu of re-establishing the slash burning exemption in Open Burning Control Areas, a return to issuance of Letter Permits set forth under OAR 340-264-0180 that have been arbitrarily denied by DEQ.
- That all harvesting and maintenance of forests, as already defined under the Oregon Forest Practices Act, be made the responsibility of the Oregon Department of Forestry (ODF). Such burning, on approved days, would fall within the guidelines of the Oregon Smoke Management Plan.
- An option that may be part of any discussion on slash burning, would be to allow such burning in a manner consistent with the disposal of Christmas trees between October 1st and May 15th as specified under ORS 571.505.

The need for agreement on these concerns and requested actions is imperative and as such we support negotiations between those agencies, DEQ & ODF, and forest related organizations such as CCFFA/OSWA.

CCFFA Slash Burning Work Group contacts:

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