

September 13, 2017

Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477

Subject: Comments on the proposed revisions to the LRAPA Title 47: Open (Outdoor) Burning rules

As a long-time resident of the City of Eugene and a property owner within the Eugene Urban Growth Boundary (Eugene UGB), and a former member of the LRAPA Board I have been an advocate for protecting the air quality of the area for many years. Although I support the majority of the proposed revisions to the LRAPA Title 47: Open (Outdoor) Burning rules, I am in strong opposition to the proposed prohibition of residential outdoor burning of woody material within the Eugene UGB during the periods of the year when residential open burning is currently allowed.

Through my years of experience working with the staff of LRAPA as a board member, I have appreciated the expertise and knowledge of the LRAPA staff. However I must take exception to the stated staff consensus that the “The proposed rule changes will likely add minimal cost to a member of the public within the Eugene Urban Growth Boundary...”. As the owner of 8.25 acres of forested property within the Eugene UGB this proposed change will result in several thousand dollars of cost to me over a period of just a year or two. The LRAPA Technical Support Document (page 4) in part justifies the proposed change due to the availability of curbside pickup of yard debris. That solution is not a viable option for landowners within the Eugene UGB with relatively large tax lots.

As you will recall during the winter of 2016 – 2017 the Eugene area experience possibly the worst ice storm in the area’s history. This storm resulted in extensive damage to the trees on my property. Although I have been diligent at removing the woody debris from my property as quickly as possible, my estimate is that it will take at least an additional year to deal with the majority of the woody material from just the one storm. An additional impact to my property has been the summer droughts that have resulted in additional stress and death of many trees. I do not own a truck or other equipment capable of transporting woody material to a yard trimming recycling facility and even if I did, moving it to a location where it would be accessible for loading on a truck would be very labor intensive. A concern I have is that the large accumulation of dead woody material on my property has resulted in an increased risk for a catastrophic wildfire that could potentially spread to adjacent property. Prohibiting residential burning of woody material within the Eugene UGB would restrict the ability of owners of relatively large tax lots to deal effectively with fuel loading as a result of storms and drought.

The current regulations allow burning on residential tax lots of 0.5 acres or greater at specific times of the year when atmospheric mixing and air quality is good. Rather than a complete prohibition of residential burning of woody debris, I believe a better option would be to increase

the minimum tax lot size within the Eugene UGB to greater than 5 acres, a ten-fold increase in the minimum tax lot size compared to the current regulation. This would allow property owners with relative large lots to deal effectively with the woody debris and make sure that where burning does occur it would be in areas of relatively low housing density and air quality would be protected. Please do not place a complete prohibition of residential burning of woody debris on relatively large lot lots within the Eugene UGB.

Thank you for the opportunity to provide comments on the proposed changes to the LRAPA Title 47: Open (Outdoor) Burning rules.

Sincerely,  
Al Johnson

LRAPA Board Member 1995 – 2002  
LRAPA Vice-Chair 1996  
LRAPA Board Chair 1997, 1998 and 1999