



Lane Regional Air Protection Agency (LRAPA)
 Notice of Proposed Rulemaking Hearing
 September 14, 2017
 Board of Director's Meeting
 Rulemaking Action Item

Update LRAPA Title 47 – “Open (Outdoor) Burning”
 (Outdoor Burning 2017)

This file contains the following documents:

- Staff Report
- [Attachment A: Proposed revisions to LRAPA Title 47 Open\(Outdoor\) Burning Rules \(redline version\).](#)
- [Attachment B: Crosswalk summary of proposed revisions to LRAPA Outdoor Burning Rules.](#)

Overview

Short summary

DEQ proposes to incorporate Lane Regional Air Protection Agency revised regulations for outdoor burning into Oregon's State Implementation Plan in Oregon Administrative Rule 340-200-0040. The LRAPA Board of Directors will consider the adoption of outdoor burning rules revisions in an effort to meet or maintain federal air quality standards for fine particulate matter and to improve the general air quality of Lane County. The LRAPA rules were revised to:

- Change the term "Open Burning" to "Outdoor Burning" throughout Title 47
- Clarify terminology pertaining to size and materials of "religious ceremonial fires" and "bonfires"
- Clarify terminology relative to outdoor burning during the LRAPA "Home Wood Heating Season"
- Require residents within the Oakridge Urban Growth Boundary to be subject to outdoor burning prohibitions and exemptions during the November through February Oakridge "Home Wood Heating Season"
- Identify the Eugene and Springfield Urban Growth Boundaries as separate
- Identify cardboard, clothing and grass clippings as "prohibited materials"
- Prohibit outdoor burning in barrels
- Prohibit outdoor burning within the Eugene Urban Growth Boundary
- Include in LRAPA rules Oakridge and Florence outdoor burning ordinances requirements
- Limit outdoor burning to woody yard trimmings within the city limits of Junction City, Coburg, Cottage Grove, Creswell, Lowell, Westfir, Dunes City and Veneta and further clarify relative to affected areas
- Update names of Fire Districts
- Update "Forest Slash Outdoor Burning" requirements in areas not covered by Department of Forestry Smoke Management Plan

- Increase fee for prescribed burning of standing vegetation permits (species or wetland conversion) from \$100 to \$1,000 and include caveat relative to Director discretion in fee adjustment
- Increase fee for permits required for forest slash open burning in areas not covered by the Department of Forestry Smoke Management Plan and for construction, demolition, commercial or industrial open burning from \$4 per cubic yard to \$10 per cubic yard and minimum fee from \$50 to \$100

Brief history

LRAPA, in consultation with DEQ and the U.S. Environmental Protection Agency, is responsible for ensuring that Lane County communities comply with federal air quality health standards, including enacting plans to restore healthy air quality in any area violating standards. LRAPA conducts air monitoring, permitting and compliance, inspection and enforcement, and regulates outdoor/open burning and asbestos abatement throughout Lane County. It also has a woodstove advisory program, an outdoor burning advisory program and conducts special projects focused on air quality. The agency is funded by local dues from Lane County and the cities of Lane County, industrial and other permitting fees, and LRAPA coordinates with DEQ to obtain EPA funding and state general funds.

In the late summer of 2013 because of concerns about the seasonal timing, unrestricted volume and unrestricted materials requirements pertaining to “religious ceremonial fires” the LRAPA Board in conjunction with the LRAPA Advisory Committee directed staff to address this concern via rule review and amendment. The project evolved into a comprehensive Title 47 rule review and amendments.

On September 14, 2017, the LRAPA Board of Directors plan to hold a hearing on the Title 47 Open (Outdoor) Burning rules, provided at the end of this document. The Environmental Quality Commission and DEQ have oversight authority to ensure LRAPA meets Clean Air Act requirements. The State Implementation Plan is the State of Oregon Clean Air Act Implementation Plan as adopted by EQC under OAR 340-200-0040 and approved by EPA. EQC’s role is to review LRAPA rules to determine if they comply with state law and the Clean Air Act, approve those rules if they comply, and direct DEQ to submit the approved rules to EPA for federal approval as State Implementation Plan amendments.

Regulated parties

The proposed amendment to LRAPA’s Title 47: Open (Outdoor) Burning does not change the regulated parties.

Statement of need

What need is LRAPA trying to address?

LRAPA proposes that the Board of Directors approve the proposed rule changes based on the LRAPA mission of protecting air quality and the existing “General Policy” outlined in LRAPA Title 47 “Outdoor Burning” Section 47-001, which states, “In order to restore and maintain Lane County air quality in a condition as free from air pollution as is practicable, consistent with the overall public welfare of the County, it is the policy of the Lane Regional Air Protection Agency to eliminate outdoor burning disposal practices where alternative disposal methods are feasible. As a result, all outdoor burning is prohibited in Lane County except as expressly allowed by these rules or if exempted from these rules by Oregon Statute. Contained in these rules are the requirements for

the outdoor burning of residential, construction, demolition, commercial, and industrial waste, and forest slash waste on properties outside the Oregon Smoke Management Plan.”

How would the proposed rule address the need?

LRAPA’s outdoor burning rules provide a consistent basis for complaint response and help prevent nuisances and violations of PM_{2.5} National Ambient Air Quality Standards in Lane County.

How will LRAPA know the need has been addressed?

The outdoor burning control program will continue to require LRAPA’s diligent implementation to minimize air pollution impacts and nuisances. Indicators of the success of this program will be attainment and maintenance of the PM₁₀ and PM_{2.5} air quality health standards, reduced impacts of residential outdoor burning on neighbors and fewer public complaints.

Rules affected, authorities, supporting documents

Lead division	Program or activity
Operations	Outdoor Burning
Chapter 340 action	
Amend	OAR 340-200-0040
LRAPA title action	
Amend	LRAPA Title 47 Outdoor Burning
Statute implemented	
	ORS 468.020, 468A.035, and 468A.135

Documents relied on for rulemaking [ORS 183.335\(2\)\(b\)\(C\)](#)

Document title	Document location
Code of Federal Regulations	http://www.gpo.gov/fdsys/browse/collectionCfr.action?collectionCode=CFR
Federal Register	http://www.gpo.gov/fdsys/browse/collection.action?collectionCode=FR
Oregon Administrative Rules	http://www.deq.state.or.us/regulations/rules.htm
Oregon Revised Statutes	http://www.deq.state.or.us/regulations/statutes.htm
LRAPA Rules and Regulations	http://www.lrapa.org/205/Rules-Regulations

Fee Analysis

This rulemaking involves fee changes as earlier described for outdoor burning letter permits. The current permit fee for these types of burns was set in the mid 1990’s. Changing the fees encourages more rigorous evaluation of the alternatives to burning as a means of disposal and more effort in pre-planning salvage efforts in demolition or land-clearing projects. The changes in fees are more realistic in costs associated with LRAPA permitting and compliance assurance.

Statement of fiscal and economic impact

[ORS 183.335 \(2\)\(b\)\(E\)](#)

Fiscal and Economic Impact

LRAPA expects that the proposed rule changes will add a direct collective cost to owners or operators who may conduct the outdoor burning of woody yard trimmings within the Eugene Urban Growth Boundary. However, since the inception of the half-acre exemption aspect (circa 1995) multiple alternative methods of disposal such as local yard debris recycling centers and waste hauler yard debris recycle bins are available to urban residents. Fallen leaves and non-woody vegetation are easily composted and are currently not allowed to be burned within the UGB.

The permit fees were set in (circa 1995) and the increase in fees are adjusted to be more comparable to present day costs of alternate to burning methods to encourage the use of alternate to burning disposal evaluations and methods.

The increase in fee for prescribed burning of standing vegetation permits is relative to LRAPA resources directed to the permitting, monitoring and response to the public. In about 1995 when the \$100 fee was instituted, LRAPA received applications and fee from multiple organizations and issued separate permits. Presently, the groups have formed a partnership of which LRAPA receives a single permit application and fee, however LRAPA resources directed relative to the permit, monitoring and response to the public is equivalent to multiple permits. There is also included in the rule a caveat by which the fee may be adjusted at the discretion of the Director.

Statement of Cost of Compliance

State and Federal Agencies

LRAPA does not expect that the proposed outdoor burning rule changes will impose any direct fiscal or economic impact on any state or federal agency. The proposed rule changes may result in increased revenue for LRAPA, however the increase in fees will likely result in operators electing alternate methods of disposal and resultant decrease in LRAPA revenue. In either case the cost differential would be considered negligible. State and Federal Agencies within the LRAPA area of jurisdiction have generally adopted alternate burning waste management strategies.

Local governments

LRAPA does not expect that the proposed outdoor burning rule changes will impose any direct fiscal or economic impact on Local Governments. The proposed rule changes may result in increased revenue for LRAPA, however the increase in fees will likely result in operators electing alternate methods of disposal and resultant decrease in LRAPA revenue. In either case the cost differential would be considered negligible. Local governments within the LRAPA area of jurisdiction have generally adopted alternate burning waste management strategies.

Public

The proposed rule changes will likely add minimal cost to a member of the public within the Eugene Urban Growth Boundary relative to transport or pickup of woody yard trimmings. However, several woody yard trimmings recycling centers are located near the affected area and recycle bins from local waste haulers are generally readily available within the UGB.

The proposed rule changes will likely add minimal cost to a member of the public within the areas affected by increase in permit fees to conduct the outdoor burning of materials for which

permits are required. However, the permit fees are generally minimal relative to the requirements imposed by permit pertaining to efficient combustion and management.

Large businesses - businesses with more than 50 employees

Most of the businesses affected by these proposed rule changes are small businesses and would not expect large businesses to be impacted other than a positive impact relative to yard debris recycling haulers.

Small businesses – businesses with 50 or fewer employees [ORS 183.336](#)

Most of the businesses these proposed rule changes affect are small businesses. However, the small businesses that are engaged in activities relative to outdoor burning permitting requirements are engaged in the preparation of materials to be burned and conduct the burning. The difference in costs of management of burning versus immediate alternate would likely be negligible.

- | | |
|---|---|
| <p>a. Estimated number of small businesses and types of businesses and industries with small businesses subject to proposed rule.</p> | <p>This proposal will affect approximately twenty-five small businesses.</p> |
| <p>b. Projected reporting, recordkeeping and other administrative activities, including costs of professional services, required for small businesses to comply with the proposed rule.</p> | <p>This proposal only negligibly affects small businesses; therefore, no additional activities apply to small businesses.</p> |
| <p>c. Projected equipment, supplies, labor and increased administration required for small businesses to comply with the proposed rule.</p> | <p>This proposal only negligibly affects small businesses; therefore, no additional activities apply to small businesses.</p> |
| <p>d. Describe how LRAPA involved small businesses in developing this proposed rule.</p> | <p>LRAPA presented to their standing advisory committee that includes small business representatives the proposed rule changes.</p> |

Documents relied on for fiscal and economic impact

Document title	Document location
Code of Federal Regulations	http://www.gpo.gov/fdsys/browse/collectionCfr.action?collectionCode=CFR
Federal Register	http://www.gpo.gov/fdsys/browse/collection.action?collectionCode=FR
Oregon Administrative Rules	http://www.deq.state.or.us/regulations/rules.htm

Advisory Committee:

LRAPA’s standing Citizens Advisory Committee was provided on-going updates of the rulemaking progress and provided guidance to staff during the entire process.

Housing cost

As ORS 183.534 requires, LRAPA evaluated whether the proposed rule would have an effect on the development cost of a 6,000-square-foot parcel and construction of a 1,200-square-foot detached, single-family dwelling on that parcel. LRAPA determined the proposed rule the development costs of burning verses alternative methods would be negligible.

Federal relationship

Relationship to federal requirements

The proposed rules add requirements additional to those in federal requirements. There are no federal rules applicable to outdoor burning. LRAPA's outdoor burning rules are an element of the State Implementation Plan that is a federally approved and enforceable strategy outlining how Oregon will meet federal air quality standards to protect public health and the environment.

The proposed rules would update the outdoor burning requirements adopted by LRAPA on March 14, 2008.

What alternatives did LRAPA consider if any?

A total ban on outdoor burning was not considered feasible in an area as diverse as Lane County. Outdoor burning is recognized as an important tool for disposal of yard debris and reducing overall fire danger, especially on larger acreages in more rural areas of Lane County.

Land use

"It is the (*Environmental Quality*) Commission's policy to coordinate the Department's (*DEQ's*) programs, rules and actions that affect land use with local acknowledged plans to the fullest degree possible." OAR 340-018-0010

Land-use considerations

To determine whether the proposed rule involve programs or actions that are considered a *land-use action*, LRAPA considered the following state and/or DEQ program requirements:

- Statewide planning goals for specific references. Section III, subsection 2 of the DEQ State Agency Coordination Program document identifies the following statewide goal relating to DEQ's authority:

Goal	Title
5	Open Spaces, Scenic and Historic Areas, and Natural Resources
6	Air, Water and Land Resources Quality
11	Public Facilities and Services
16	Estuarial Resources
19	Ocean Resources

- OAR 340-018-0030 for EQC rules on land-use coordination. Division 18 requires DEQ to determine whether proposed rules will significantly affect land use. If yes, how DEQ will:
 - Comply with statewide land-use goals, and
 - Ensure compatibility with acknowledged comprehensive plans, which DEQ most commonly achieves by requiring a Land Use Compatibility Statement.

- DEQ's mandate to protect public health and safety and the environment.
- Whether DEQ is the primary authority responsible for land-use programs or actions in the proposed rules.
- Present or future land uses identified in acknowledged comprehensive plans.

Determination

LRAPA determined that the proposed rules do not affect land use under OAR 340-018-0030 or DEQ's State Agency Coordination Program. LRAPA's rules are consistent with land use in applicable Lane County land use plans.

Stakeholder and public involvement

Advisory committee

LRAPA has a standing advisory committee that meets most months. LRAPA consulted their advisory committee for this rulemaking and presented a summary of the changes to the committee at their standing meetings periodically from 2013 to 2017. An outdoor burning subcommittee was formed and met one time on November 20, 2013.

The committee members that attended the meetings agreed to the proposed changes at the final meeting on January 31, 2017. Notes from the January 2017 meeting located here: <http://www.lrapa.org/DocumentCenter/View/2519> . All CAC meeting notes regarding this rulemaking are available on the LRAPA website.

The committee notes are available included as an agenda item linked to the Board of Director's agendas on the LRAPA website: :

<http://www.lrapa.org/AgendaCenter/Search/?term=&CIDs=2,3,&startDate=&endDate=&dateRange=&dateSelector=>

Roster

Name	Representing
Maurie Denner, Chair	General Public
Chuck Gottfried, Co-Chair	Agriculture
Larry Dunlap, Member	Public Health
Jim Daniels, Member	Large Industry
Paul Engelking, Member	General Public
Laura Seyler, Member	Large Industry
Leonard Epstein, Member	General Public
Gery Vander Meer, Member	General Public
John Tamulonis, Member	Public Planning
Randy Hledik, Member	Industry
Kathy Lamberg, Member	General Public

Link Smith, Member	Fire Suppression
Terry Richardson, Member	General Public

Meeting notifications

To notify people about advisory committee's activities, LRAPA posted the agendas for all meetings on our website at:

<http://www.lrapa.org/AgendaCenter/Search/?term=&CIDs=3.&startDate=&endDate=&dateRange=&dateSelector=>

- LRAPA sends a one-time notice to the Citizens Advisory Committee subscribers email list alerting to the meeting agenda for each month.

LRAPA prior involvement

LRAPA shares general rulemaking information with the Board through the monthly Director's Report and information items on the Board agenda. LRAPA met with several city and county governments prior to developing amendments and provided specific advance notice to city governments of which no meeting was held to provide for these entities to comment on the proposed amendments. LRAPA met with the Lane County Fire Defense Board and presented the proposed amendments. The Lane County Fire Defense Board expressed agreement with the proposed amendments. LRAPA met with the Grange, the Santa Clara and River Road citizens advisory groups to discuss the proposed changes and also conducted a survey of the Santa Clara and River Road citizens advisory groups to ascertain outdoor burning proclivities.

Stakeholder groups the rule revisions were presented to between 2013 and 2016:

Group
Santa Clara Community Org
River Rd. Neighborhood
Lane Pomona Grange #14
City of Cottage Grove
City of Eugene
City of Springfield
City of Lowell

Public notice

LRAPA provided notice of the Notice of Proposed Rulemaking with Hearing on August 1st to:

- Secretary of State for publication in the [*Oregon Bulletin*](#) to be published in the August edition.
- The LRAPA Web page notice: <http://www.lrapa.org/calendar.aspx?CID=22>
- 132 interested parties on the LRAPA Rulemaking List on August 1, 2017
- 7,701 stakeholders on the DEQ GovDelivery list on August 1, 2017
- LRAPA provided legal notices in the following newspapers:
 - Register Guard (Eugene)* Publication date – August 1, 2017
 - Dead Mountain Echo (Oakridge)* Publication date – August 3, 2017

Siuslaw News (Florence) Publication date - August 2, 2017
The Sentinel (Cottage Grove) Publication date - August 2, 2017

Public hearings

A hearing on the proposed adoption and rulemaking will be held at 12:30 P.M. September 14, 2017, in the LRAPA Conference Room. The public is encouraged to comment on the proposed rule amendments. Comments submitted prior to the hearing date must be submitted in writing and must be received by LRAPA by Wednesday, September 13, 2017. Comments submitted at the hearing must be presented orally by the commenter. If LRAPA Board adopts this rulemaking, the plan and rules will be presented to the Environmental Quality Commission for approval and submitted by DEQ to the U.S. Environmental Protection Agency as a revision to the State Implementation Plan under OAR 340-200-0040 as a requirement of the Clean Air Act.

To submit comments or request additional information, please contact Robbye Lanier at LRAPA, 1010 Main Street, Springfield, OR 97477, toll free in Oregon at 877-285-7272 or 541-736-1056 extension 214, email at robbye@lrapa.org. Fax 541-726-1205. To view the proposed rule changes online, visit <http://www.lrapa.org>.

Before taking public comment and according to [Oregon Administrative Rule 137-001-0030](#), the presiding officer staff presenter will summarize the content of the notice given under [Oregon Revised Statute 183.335](#) and respond to any questions about the rulemaking.

LRAPA will add the names, addresses and affiliations of all hearing attendees to the interested parties list for this rule if provided on a registration form or the attendee list. LRAPA will consider all oral and written comments received at the hearing listed below before completing the proposed rule. LRAPA will summarize all comments and respond to comments on the staff report.

Hearing	
Date	September 14, 2017
Time	12:30 p.m.
Address line 1	Lane Regional Air Protection Agency (LRAPA) Meeting Room
Address line 2	1010 Main Street
City	Springfield, Oregon 97477
Presiding officer	Merlyn Hough, Agency Director
Staff presenter	Merlyn Hough, Agency Director
Conference number	(541) 736-1056 x302

Close of public comment period

The comment period will close on September 14, 2017 at the Public Hearing.

LRAPA Office:

Lane Regional Air Protection Agency (LRAPA)
 1010 Main Street
 Springfield, Oregon 97477
 541-736-1056

Summary of comments and LRAPA responses

Attachments	Comment	Response
-	<p>I strongly support the proposed changes to the LRAPA Title 47 Outdoor Burning rules. It's crucial to protect our air quality. Thank you, Barbara Berkley Sent from my iPhone</p>	
-	<p>I would like to see stronger limits on Outdoor Burning, preferably no burning of debris within the city limits of Cottage Grove. There are days that I have a difficult time being outside due to backyard burning, and I do not even have asthma. I do support the proposed changes to LRAPA Title 47 Outdoor Burning rules. It is a step in the right direction. Thank you. Amanda Nichols</p>	
-	<p>It IS appropriate to eliminate outdoor burning within the Eugene Urban Growth Boundary. With a growing population causing more pollution, nearly constant forest fires all summer and fall, rising temperatures, particularly high spring and summer pollen counts, our air quality has suffered greatly over the 13 years I've lived in the mid-River Road area. There are too many warm nights that we cannot keep our windows open due to smoke. Our indoor smoke detectors have gone off twice already this summer! Julie Schaum</p>	
-	<p>With all due respect, I think the proposed ban is an over reach of government. Can the use of a chimera or fire pit for social gathering within the existing code parameters be so offensive or threatening that it must be banned? Is there evidence or research that there is increased fire hazard in neighborhoods around the country where it is permitted? If so, please present this evidence at a public hearing. Lou Wentz</p>	<p>On Fri, Aug 18, 2017 at 11:06 AM, John Morrissey <mojo@lrapa.org> wrote: Mr. Wentz, The proposed rule changes do not amend the provisions for the allowance of cooking or recreational fires except that the Urban Growth Boundary surrounding the City Limits of Oakridge will be subject to the same restrictions as citizens within the Oakridge City limits during the Home Wood Heating (HWH) Season which runs from October 1 through May 31. The restriction is that recreational fires are prohibited on "yellow" or "red" HWH days which are times when smoke levels in that area have reached levels that may be unhealthful for segments of the population. The same restriction applies to areas within the Eugene and Springfield Urban Growth Boundaries during the HWH season.</p>

John Morrissey, LRAPA

From: Nonewhere Listens
 [mailto:bluegrassbreeze2@gmail.com]
 Sent: Saturday, August 19, 2017 2:10 PM
 To: John Morrissey <mojo@lrpa.org>
 Subject: Re: Online Form Submittal: Public
 Comment Form
 It wasn't clear to me that the wording of the
 proposed rule I saw on the River Road
 Neighborhood Organization notification e-
 mail made any differentiation on the source
 or intent of the fires. Thanks for the
 clarification. Lou Wentz

Attachment
(PDF)

August 31, 2017
 Thank you for the opportunity to comment
 on proposed amendments to rules regarding
 open burning in LRAPA Title 47. I am
 submitting this testimony on behalf of the
 League of Women Voters of Lane County
 (LWVLC).
 The League supports LRAPA's efforts to
 improve air quality in Lane County by
 revising the regulations governing outdoor
 burning. The League believes that all
 segments of society (government, industry,
 agriculture, and individuals) share the
 responsibility for improving air quality.
 Specifically, the League supports extending
 city-wide restrictions to the areas within the
 respective growth boundaries of Eugene,
 Springfield, and Oakridge as proposed. This
 is especially critical for Eugene due to
 patchwork annexation in some areas. We
 also support the proposed changes to
 section 47-015 E that define and add
 prohibited materials and the addition of
 section 47-015 I that prohibits burning in
 barrels. We appreciate that the proposal
 contains different restrictions depending on
 population densities, location within or
 outside of cities or fire districts, and natural
 weather impacts on air quality.
 In order to promote voluntary compliance,
 we encourage LRAPA to conduct extensive
 public education about any adopted
 amendments through the media, internet,
 and community meetings. Many residents
 are aware of and concerned about the
 frequent deterioration of local air quality and
 interested in guidance about their part in the
 solution.
 If you have any questions about the
 League's position on this matter or if you
 believe we can assist in the public education

process, please do not hesitate to contact me.
Sincerely,
Linda Lynch
President

Why would it be advisable to prohibit burning in barrels? Following the times permitted for outdoor burning and using a barrel with a mesh top seems to contain a fire rather than just on the ground.

The containment aspect is not paramount, however it is partly a basis for prohibiting outdoor burning in barrels. The concept of a barrel and a screen as containment provides many folks with a false sense of security of a safe burn. That false sense of security provides some with the belief that it is OK to burn in August because the fire is contained. Some wildfires are caused from folks burning in barrel and screen "containment". The containment aspect should generally not be an issue because the LRAPA burn season will not begin and may end at any time if the Lane Fire Defense Board (LFDB) has determined that conditions are such that outdoor burning is deemed hazardous. The LFDB will convey that information to LRAPA and LRAPA will adjust the burn advisory accordingly.

Another aspect related to the banning of burning in barrels is related to inefficient combustion. Efficient combustion requires air and even with a few holes in the sides towards the bottom (which are soon covered) the air supply is limited, resulting in smoky and smoldering burns.

The primary reason for the ban on burning in barrels is that the barrel is used as a garbage "incinerator". The current rules do not allow the outdoor burning of garbage, plastics, etc. at any time. This writer has responded to thousands of complaints or observations of folks burning in barrels and a hand full of those were of the burning of allowable to be burned material. The rest were of garbage or materials that are prohibited from being burned at any time. Because of inefficient combustion these barrel fires can smolder for hours or days and inundate the neighborhood with toxins and noxious odors. This writer has also experienced that rental properties equipped with a burn barrel provide new tenants with "authorization" to burn trash.

To Whom it May Concern,
We are writing to express our strong support for the change to LRAPA Title 47: Open (Outdoor) Burning rules that would prohibit

outdoor burning within the Eugene Urban Growth Boundary.

Our family lives in the River Road neighborhood on Sunnyside Drive, a street that has a somewhat rural feel due to lack of curbs and sidewalks, but with lots less than a quarter acre. We live close to our neighbors and the lots are not large enough for people to have burn piles. However, on the first beautiful days of spring this year, we were forced inside on multiple weekends due to thick smoke from our neighbors' burn piles.

We do not think they were trying to avoid the rules, but rather that the rules were not clear enough that they knew to whom they applied. The fact is, very few people, if anyone, within the Eugene UGB are far enough from their neighbors that they can have a burn pile without the possibility of it affecting their neighbors' air quality.

Thank you for simplifying the rules and protecting the air quality of the County's largest community.

Sarah Mazze and Steve Korin
534 Sunnyside Drive
Eugene, OR 97404
650-862-5423
sjmazze@gmail.com

I have a history with LRAPA with regard to backyard burning in Oakridge where I live. I have a neighbor who has huge bonfires all year round 10 feet from my house and the smoke seeps in no matter if windows are closed. They burn yard waste and other garbage. I have called local police who tell me that they say it's a cookout to not illegal. It's not a cookout. They pile all manner of materials and then fan it with a leaf blower and party around it. I have seen sparks land on my roof. It frightens me. I also have COPD as a result of breathing in unregulated wood smoke for several years. I fully support changes under title 47 to ban or regulate backyard burning in Oakridge. It is dangerous to elderly like me and children. There are significant numbers of people with lung disease here and it is a travesty they are not protected. Thank you.