

Puget Sound Clean Air Agency

Thank you for the opportunity to comment on the Washington State Department of Natural Resources Smoke Management Plan as it is proposed to be incorporated into the State Implementation Plan (SIP).

The Puget Sound Clean Air Agency's jurisdiction covers King, Kitsap, Pierce, and Snohomish counties. These four counties are home to more than 4.1 million people, over half the state's population.

The smoke from burning wood and wood-based debris contains fine particles (soot) and a toxic mix of other carcinogens. This pollution is harmful to human health, particularly for sensitive groups — infants, children, and people over 65, and those that are pregnant, have heart or lung diseases (such as asthma or COPD), respiratory infections, diabetes, stroke survivors, and those suffering from COVID-19.

To better protect human health, the Agency has sought to limit outdoor burning within its jurisdiction, and especially within the Urban Growth Area, to the greatest extent possible. We believe reasonable alternatives exist for vegetation management.

The Agency understands that the Department of Natural Resources regulates silvicultural burning within King, Kitsap, Pierce and Snohomish Counties, and has recently promulgated a rule change to allow such burning within the Urban Growth Area. We appreciate all coordinated efforts by DNR and the Department of Ecology to regulate this type of burning in a way that minimizes fine particle pollution and protects human health.

As the primary recipient of air quality related feedback from the public, the Agency reserves its authority to respond to smoke and nuisance complaints within King, Kitsap, Pierce and Snohomish counties, as appropriate, and if necessary, as supported by the evidence, enforce Agency regulations, including Regulation 1, Article 9.11 (a):

(a) It shall be unlawful for any person to cause or allow the emission of any air contaminant in sufficient quantities and of such characteristics and duration as is, or is likely to be, injurious to human health, plant or animal life, or property, or which unreasonably interferes with enjoyment of life and property.

The above regulation is incorporated into the Puget Sound Clean Air Agency's State Implementation Plan, and as such, we reserve the right to enforce Agency regulations as necessary to protect the public we serve. Coordination between DNR and this Agency with respect to complaints may be important to the success of this program in our four counties.

We believe that this plan (and regulations adopted that led to it) do not alter or revise any requirement or provision of this Agency's prohibitions of land clearing burning included in our Regulation I, Section 8 (Outdoor Burning). Land clearing burning is banned in all four of the counties in our jurisdiction.

Thank you,

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Submitted by:

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