



December 19<sup>th</sup>, 2013

Re: Promoting Smoke Free Beaches as part of Statewide Rulemaking for Tobacco Use

Chair Graves, Members of the OPRD Commission & Director Wood,

On behalf of hundreds of Surfrider Foundation members in Oregon, we would like to thank you for your efforts to promote the health and wellness of Oregonians and visitors to our state parks by initiating rulemaking about tobacco use within state park property. As longtime partners of the agency in addressing the on-going challenge of marine debris, we feel that a significant oversight has been made in not including the Ocean Shores Recreation Area as part of the draft rules. After considering the full range of ecological, social, and economic impacts associated with tobacco use on our public beaches, we respectfully request that the Ocean Shores Recreation Area be included for adoption in final rulemaking under Division 21 rules at the same time as Division 10 rulemaking.

Cigarette butts are the number one litter item collected during our frequent chapter beach clean-ups. According to the *International Journal of Environmental Research and Public Health*, an estimated 1.69 **billion** pounds of butts wind up as litter worldwide per year. Surfrider volunteers participate annually in the Ocean Conservancy's International Coastal Cleanup Day and data reports are kept on the type of debris collected. These reports state that "cigarette butts have been the single most recovered item since collections began", representing 35% of the total debris collected. Cigarette butts are not only unsightly litter, but can also be toxic to young children, wildlife and pets.

Cigarette butts are polluting the coastal areas where people surf, swim, kayak, fish, and play. They can be toxic to marine life, take decades to decompose, and have been shown to be lethal to fish and other marine species. Oregon's coastal parks are the crowning glory of our state park system and receive some of the highest rates of visitation within the state. Leaving the Ocean Shores Recreation Area out of rulemaking would send an incorrect message to the public; that smoking on Oregon's public beaches has no negative consequences. This is clearly not true. Cigarette butts are time consuming and expensive to pick up because of their small size. If steps are taken through rulemaking to reduce or eliminate them from our beaches, then volunteers will be able to focus their efforts on different challenges such as removal of tsunami debris.

The negative effects of tobacco and secondhand smoke have been well known for years. Secondhand smoke exposure outdoors can be just as harmful as secondhand smoke exposure indoors. Recent studies indicate that sitting three feet away from a smoker outdoors exposes a person to the same level of secondhand smoke as a comparable indoor setting. Governor Kitzhaber, recognizing the negative health effects of outdoor smoking, has issued an executive order directing state parks to undertake this rulemaking effort.

This initiative does not tell people they cannot smoke. It simply prevents them from smoking in public parks and using our beaches as ashtrays. By establishing tobacco free beaches, Oregon will join a growing number of public parks and beaches across the country that are protecting people's health and the environment. Tobacco free beaches do succeed in areas that have good signage, good public education, and self-enforcement. The Surfrider Foundation, along with the Oregon Health Authority, is ready and willing to partner with you on the implementation of this policy change. If adopted, this effort will preserve the beauty of our beaches and parks, while also improving the health of our residents and visitors. Please take advantage of this opportunity to eliminate a chronic source of marine debris by including rulemaking for tobacco use in the Ocean Shore Recreation Area under Division 21, in addition to the current draft rules under Division 10.

Sincerely,

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