

Tahoe Blue Sky Initiative
www.TahoeSierraCleanAir.org

Whereas, the clean air of the Lake Tahoe Basin, and entire Sierra Nevada including Sierra foothill communities and surrounding valleys have become increasingly and repetitively compromised and polluted as a result of standard government agency smoke emitting burn practices and **failed “Smoke Management Plans”** from pile burning, prescribed burns and managed burns emitting unacceptable repetitious levels of unwanted and **forced** smoke inhalation exposure to humans, our pets, wildlife and our atmosphere containing PM10, PM2.5, carbon black, phosphorous, mercury, nitrogen and a myriad of other chemicals, and

Whereas, any agency created burn event failed **“Smoke Management Plan”** or agency created **managed** burn event (as defined below) compromises air quality and safety, collectively affecting **all** humans and wildlife in the immediate area of the burn event and, depending on the size of the event and atmospheric conditions, can travel and extend many hundreds or thousands of miles throughout the entire Sierra Nevada Range, it’s foothill communities, geographical region and across State Lines regardless of jurisdictional boundaries, and

Whereas, we are asked to “live with burn agency created smoke” and be fire adapted, **the human lung is not “smoke adapted”** and agency created or managed burn events contain a wide variety of particulate and carcinogenic pollutants that contribute to the cause of and exacerbate health problems including asthma, diminished lung function, respiratory ailments including COPD, heart attack and stroke, cancer and therefore imperil public safety **for not only sensitive individuals but for us all**, and

Whereas, agency created or managed burn event smoke coupled with **ineffective and failed “Smoke Management Plans”**, degrade air quality, create greenhouse gases and conditions that exacerbate algae growth harmful to our lakes and streams, thereby diminishing our quality of life, natural ecology, wildlife, views, recreational enjoyment and commerce opportunities in the region, and

Whereas, local, state and federal burn managers need to more closely consider and analyze numerous health, safety, wildlife, recreational and commerce impacts from the toxic smoke they create including workable substantive **“Smoke Management Plans”**, **with contingencies** before approving and carrying out agency created burn events, including consideration for the unique air quality impact on the Lake Tahoe Basin as well as our treasured wilderness areas and National Parks within the Sierra Nevada region, and

Whereas, local, state and federal burn agencies and top level burn managers should be held accountable **for inadequate or failed “Smoke Management Plans” and escaped prescribed/controlled burns** in connection with agency created or managed burn event practices. They must more closely consider, as part of their decision making process, more complete smoke related health, safety and environmental impact analyses, smoke and smoldering/burn down trajectory plume modeling including **“Best Real Time Available Technology Monitoring”**. This includes real time toxicity impact analyses of dangerous smoke particle hazards, real time actual smoke trajectories, all air pollution health and safety factors, increased agency and community coordination across local, state and federal boundary's, public transparency, early public announcements indicating the true smoke impact on **all** humans, wildlife, recreation and commerce,

Therefore, be it resolved that we should all work together to develop alternatives to reduce the amount and frequency of agency created toxic smoke burn events which includes considering and endorsing the following **Tahoe Sierra Blue Sky Initiative** key points:

- That, for the purposes of this initiative, an agency burn event is defined as either an agency fuels reduction **pile burn, prescribed burn** or a **managed burn**. A **managed burn** event causes epic destruction and massive toxic smoke pollution. These are Federal or Interagency burns that could have been responded to with the priority being that of aggressive early containment and control. Instead, while always making sure to protect structures on one hand, the public is usually unaware, that at the same time, agency burn managers are allowing the fire to grow and be steered on various levels. This often includes withholding aircraft or other resources, except for structure protection of course, to allow the fire to grow in the name of the half science of forest health. **There is nothing natural about this process**. Managed burns often result in huge logging contracts that otherwise would not be permitted. The post-burn logging becomes permitted using public safety as a reason to log, but also because protected wildlife and endangered species caught in area of a managed burn are now destroyed, painfully injured or die by burning or smoke inhalation, or forced elsewhere. Once the trees are cut down for logging, their branches are removed for transport and the agencies create/permit a **secondary round of massive pile burning** resulting again in epic amounts of toxic smoke which cause forced public exposure inhalation and human suffering, extending sometimes for months.
- That burn agencies and/or burn managers should immediately and transparently inform the public via their Public Information Officer resources, utilizing social media and public news broadcast media of any decision not to employ an aggressive full fire suppression and control attack during the early initial or ongoing stages of any burn event. This includes warning the public of their true intent to employ tactics and strategies that will steer the burn allowing it to grow

via selected containment and/or control tactics. The social media and public news broadcast media notification should occur upon initial response decision making and at any time throughout the entire duration of the managed burn event whenever a steering or management decision is made versus an aggressive containment/control decision. **The public has a right to know burn agencies intentions** during the earliest stages of a managed burn event and throughout the event as to whether an agency will be aggressively seeking to contain, control and extinguish the fire or will be allowing it to continue to burn and grow over time with no aggressive containment/control time anticipated.

- In the interest of reducing toxic smoke and improving air quality **we must make air quality health a priority over agency created “must burn” priorities**. We should all work toward the goal of ensuring that smoke generating agency created burns are significantly reduced in the Lake Tahoe Basin and the Sierra Region. The poorly coordinated and now much too frequent agency burn smoke is causing us, our children, respiratory patients, our pets, wildlife, recreation and commerce to suffer needlessly. We need some explicit balance and alternatives. The Lake Tahoe Basin and the Sierra have substantial numbers of trails, fire roads and surface streets that crisscross the entire basin and the Sierra allowing for onsite natural gas or fuel chipping at the time slashed fuels are created. Other alternatives are available. This will require a shift in the **“must burn priority” agency philosophy and paradigm** of fuels reduction linked to smoke producing burning. Modern alternatives are in place and shifting large amounts funding and policies away from burning to the increased use and planning and modern technology priority alternatives are paramount.
- That agency **“Smoke Management Plans”** must be required to consider any potential smoke drift affect from short term and long term wind variables not only on the date of ignition, but extending through the smoldering and burndown phase of the agency created burn. This should include a 24 hour round the clock human and electronic air monitoring observation plan to immediately identify failed **“Smoke Management Plan”** parameters. This includes placement of adequate, effective real time electronic air monitors with real time readings that are publically transparent via the internet. These should include placement of numerous and adequate, side by side PM10 and PM2.5 monitors in a 360 Degree circumference of the smoke event. The monitors should be placed 360 degrees at 1 mile, 5 mile, 10 mile, 15 mile, 20 mile locations including areas of human population that could be impacted by changing winds or a **failed “Smoke Management Plan”**. Burn agencies should also have as part of their **“Smoke Management Plan”** the availability of resources to immediately undertake full suppression immediately when the **“Smoke Management Plan”** fails and/or humans are impacted by excessive PM10 and PM2.5 atmospheres. If this does not occur, then County Air Pollution Control Officers should immediately revoke the burn permit and issue a Notice

of Violation. **It's time to shift the agency "must burn" paradigm to a paradigm of increased planning and the use of modern technology in favor of reducing human health suffering and reducing agency created smoke impact on wildlife, recreation and commerce from agency burns.**

- To help reduce our exposure to toxic smoke and the possibility that agency created burn events can spread out of control and agency **"Smoke Management Plans"** often fail, that there be placed a local, state and federal moratorium on any agency created burn event that cannot be immediately suppressed when **"Smoke Management Plans"** and **"Burn Plans"** fail.
- An increased priority/emphasis needs to be placed on slowing the feverish pace of burn agencies poorly coordinated toxic smoke generating burns as well as the continued use and development of advanced chipper and grinder availability and technology including their exclusive use - especially those utilizing natural gas technologies and that local air quality regulators not issue burn permits for any fuels reduction pile that can be chipped or hauled. **Clean air is worth the cost.**
- That no fuels reduction pile burning take place within any area having roads or other access to within 1/2 mile thereby allowing the easy access alternative of staging and use of chippers and/or truck removal. **Chip don't burn.**
- That no agency created fuels reduction piles be allowed to remain indisposed for a period of over 30 days. These piles represent a fire hazard threat, which if ignited can cause significant damage and toxic smoke inhalation. Homeowners receive notices that their trees, shrubs and pine needles present fire hazards, yet agencies produce a much greater fire hazard as thousands of agency created Sierra burn piles sit for months or years. These piles can contribute to rapid fire spread and unnecessary toxic smoke exposure to humans. **Chip or grind as you go!**
- That any existing fuels reduction pile that has been allowed to remain without removal for a period of at least one year be removed within the key points of this initiative before the start of the 2017 Fire Season, preferably by chipping or truck transport, and not by burning. **Burn piles are fire hazards!**
- **We need smoke free zones to protect us.** To reduce human suffering, wildlife smoke exposure, and the degradation of our unique recreational opportunities, no agency fuels reduction pile burning or prescribed burn should take place within 1 mile (measured from the leading edge of planned or contingency failed planned smoke drift), of any residential area, home, church, school, business, animal grazing or sheltering area or beehive. **Smoke free zones need to be established.**

- That **“Smoke Management Plans”** require that fuels reduction slash piles be minimized in height and width to reduce concentrated smoke creation and fuels reduction pile burning and prescribed burns occur only during active and effective precipitation smoke suppression conditions whenever possible.
- Unless performed under active and effective precipitation smoke suppression conditions, **“Smoke Management Plans”** need to require that no agency fuels reductions pile burning process or prescribed burn, including smoldering/burn down time, last more than 24 hours and there be a time gap of at least 30 days between any agency created burn events that have negatively affected, at the EPA Orange Level, the air quality of a given 50 square mile area. Smoldering/Burn down must be extinguished within 24 hours of the beginning of the burn event and that real time PM 10 and PM 2.5 monitors as discussed earlier be placed by burn agencies as a contingency to **immediately identify a failed “Smoke Management Plan”**. If active smoke suppression precipitation lessens and allows smoke to escape beyond acceptable burn/smoke plan parameters then resources should be available and steps should be taken to immediately ensure full extinguishment, including smoldering.
- **“Smoke Management Plans”** need to include a requirement that no agency fuels reduction pile burning or agency prescribed burns, which includes cradle to grave ignition and final suppression including calculated smoldering/burn down time, and wind shift contingencies, may take place within any area where the initial burn smoke as well as any smoke smoldering/burndown will impact the immediate or long term air quality of humans or wildlife, including all endangered species in the area of the projected burn area or smoke plume. This includes a direct effect on active recreation or commerce either underway or planned on any given burn day, including burndown, affecting public hiking, year round sports activities, camping, water or snow sports, planned regional recreation or commerce events which may include but not be limited to activities such as biking, running, triathlons or community fundraisers or events.
- That **“Smoke Management Plans”** contain a requirement that no agency fuels reduction pile burning or prescribed burn, which shall include calculated smoldering/burn down time, may take place on a weekend or during any national or state holiday. A weekend is defined as between 12:00 PM Friday afternoon to 6:00 AM on the following Monday morning. Full fire and smoke suppression must be complete before 12:00 PM on any given Friday or before a national or state holiday.
- That criminal sentencing terms be doubled for the crime of wildland, wildland interface or forest arson undertaken by any public agency employee, former public agency employee or public volunteer or past public volunteer, who

because of their affiliation with a public agency, would have a higher knowledge of fire burn behavior and/or potential damage, or public safety threats.

- That increased specific civil penalties be allowed and created for agency Burn Managers who decide to undertake fuels reduction burning, prescribed burns or managed burns and purposely withhold form information, violate or ignore any portion of an approved **“Smoke Management or Burn Plan”** or fail to take aggressive suppression and widespread public notification as well as immediate and complete suppression action when a **“Smoke Management or Burn Plan”** fails, of which actions or non-actions eventually lead to any proven health, smoke or fire caused property damage, or a violation of the US Environmental Policy Act or EPA Clean Air Act.
- As in the case of the Desolation Wilderness Area, that Mt. Rose Wilderness and Granite Chief Wilderness Areas be classified by the EPA as Class 1 clean air protection areas. Additionally, the single and poorly located “IMPROVE Program” smoke monitor serving both Desolation and Mokelumne Wilderness is woefully inadequate. The State of California and the EPA must take a more active role to require adequate monitoring and analyses of the true smoke and haze impacts from any current or future agency created or managed burn event on any EPA Class 1 protected areas. This includes wind shifts that take into account estimated smoldering/burn down times. Our Class 1 protected areas, including Desolation Wilderness are suffering from increased exposure to smoke and haze due to numerous poorly coordinated man made agency burn events and **failed “Smoke Management Plans”** across the Sierra, both in California and Nevada.
- Considering the entire Sierra Nevada Range and local communities as one burn region and since, due to atmospheric conditions, smoke can travel and affect entire populations many miles from the burn event across all jurisdictional boundaries, that Local, State and Federal Burn Agencies under the direction of local **Sierra Air Quality Management Districts**, create and adopt a single public access transparent **Sierra Nevada Burn Calendar**. The Burn Calendar should take into account local and regional smoke trajectories, including smoldering, human health and safety impact, wildlife impact, recreational impact, and impact on commerce. It should also take into account the number of cumulative smoke/haze or air quality Orange Days within the last 365 days (limited to 20), including burn impacts on all potential Sierra Nevada regions, regardless of jurisdictional boundaries. This criteria should determine whether or not burn agencies/managers will be able to place their agency burn events on the public access **Sierra Nevada Burn Calendar** 6 months in advance of the burn.

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