

**Tahoe Blue Sky Initiative**  
[www.TahoeSierraCleanAir.org](http://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 out of control government agency **subjective and antiquated smoke** pollution practices, and

**Whereas**, agency created pile burning, prescribed burns, out of control prescribed burns and managed (purposely grown) burns emit unacceptable repetitious and damaging levels of unwanted and forced smoke inhalation exposure to humans, pets and wildlife containing PM1, PM2.5, PM10, carbon black, ozone, ozone precursors, phosphorous, mercury, nitrogen and a myriad of other chemicals, including those that cause genetic damage, and

**Whereas**, the Tahoe Sierra Clean Air Coalition is opposed to any agency created burn event, that creates toxic smoke **that exceeds EPA air quality levels or adversely impacts** humans, pets, wildlife, recreation, commerce and atmospheric heat generation and

**Whereas** air quality officials continue to fail to provide sufficient air quality control leadership and monitoring during agency burn events, including the failure to require effective and workable **“Smoke Management Plan” pollution mitigations and “Smoke Management Plan” state of the art, adequate and accurate air monitoring** ” and

Whereas current **“Smoke Management Plans”** or burn agency created **managed** burn events (purposefully grown fires) compromise air quality and public safety, collectively affecting **all** humans, pets, wildlife, recreation and commerce, in the immediate area of agency burn events 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 and will never be “smoke adapted”** and agency created or managed (purposeful fire growth) 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 burn event smoke coupled with **ineffective and failed “Smoke Management Plans”** and inadequate air quality districts leadership, create greenhouse gases, carcinogenic black carbon and atmospheric heat 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 and effectively monitor and analyze numerous health, safety, wildlife, atmospheric heating, insect, recreational and commerce impacts from the toxic smoke they create including workable substantive **“Smoke Management Plans”, with adequate contingencies** before approving and carrying out all agency created Sierra range burn events, including recognition and consideration of the unique air quality impacts within the Lake Tahoe Basin including its’ evening inversions 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, complete and effective mechanical air monitoring, potential health, safety and environmental impact analyses, smoke and smoldering/burn down trajectory plume modeling including the requirement to utilize the **“Best Real Time Available Technology Air Monitoring”**. This includes real time toxicity impact analyses of dangerous burn 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 the best available technology alternatives to ensure adequate monitoring and 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 (purposeful fire growth) 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 retardant aircraft, other aircraft or other resources, except for structure protection of course, to allow the fire to grow in the name of the debatable half science of forest health. **There is nothing natural about this process**. Additionally, wildlife are painfully injured or die by burning or smoke inhalation, or forced elsewhere during these man made unnatural fire growth events.

- 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 early control and containment during the initial or ongoing stages of any burn event. This includes warning the public of their true intent to withhold air monitoring, direct attack retardant aircraft, and their intent to employ **Appropriate Suppression Response (ASR)**, or **Minimal Impact Suppression Tactics (MIST)**.....Code for growing fires. Unknown to the public, ASR strategies have been in place for 40 years and have been and are commonly used to purposely steer and grow a fire via selected subjective 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 early containment/control decision. **The public has a right to know burn agencies intentions.** Are they actively seeking to achieve early control and containment or are they going to grow the fire.
- In the interest of reducing toxic smoke and improving air quality **we must make air quality health a priority over the agency subjective fire agency and air quality agencies “must burn” “let burn” and “just burn it” priorities.** We should all work toward the goal of ensuring that **toxic smoke** from agency created and air quality official supported burns are significantly reduced in the Sierra region. The poorly coordinated and now much too frequent agency burn smoke including out of control and too large to handle prescribed burns are causing us, our children, respiratory patients, our pets, wildlife, recreation and commerce to suffer needlessly. We need to achieve a healthy balance by utilizing available alternatives and we need to provide adequate, accurate and effective smoke monitoring requirements. The Lake Tahoe Basin and the Sierra range have substantial numbers of trails, fire roads and surface streets that crisscross the entire basin and the Sierra allowing for onsite natural gas chippers or other mechanical chipping, grinding or hauling at the time slashed fuels are created. Other technological alternatives are available. This will require a major shift in the federal and state burn agency and air pollution control officials **“must burn” “let burn” and “just burn it” priority funding philosophy.** Providing **leadership** to shift large amounts of funding and policies away from burning using advanced modern technology priority planning alternatives are paramount.
- That agency **“Smoke Management Plans”** must require adequate and accurate mechanical smoke monitoring regulations which considers any and all potential smoke drift affect caused by 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 state of the art mechanical air monitoring observation plans to immediately identify failed **“Smoke Management Plan”** parameters. This includes placement of adequate, effective real time mechanical air monitors with real time readings that are publically transparent via the internet. These should include placement of numerous and adequate PM10 and PM2.5 monitors in a 360 Degree circumference of the smoke event. The monitors should be placed 360 degrees at ¼ mile, ½ mile, 1 mile, 5 mile, 10 mile, 15 mile and 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 PM10 and PM2.5 EPA air quality exceedances. If full suppression does not immediately occur, then Air Quality Control Officers should immediately revoke the burn permit and issue a Notice of Violation. **It’s time to shift the agency “must burn” “let burn” paradigm to a paradigm of increased planning and the use of modern technology in favor of reducing health and suffering and thereby reducing agency created second hand smoke impact on humans, wildlife, recreation and commerce.**

- 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 and supporting 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, grinded or hauled. **Clean air is worth the cost.**
- That new forest slashing be halted until all existing fuels reduction piles that have been allowed to remain as a fire hazard be removed within the key points of this initiative before the start of the 2020 Fire Season, by chipping, grinding or truck transport, and not by burning. **Burn piles are fire hazards!** Homeowners receive notices that their trees, shrubs and pine needles present fire hazards, yet burn agencies produce a much greater fire hazard as thousands and 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 all sides of any prescribed fire or burn/slash pile process must be continually and adequately monitored by personnel on a 24 hr. basis to ensure identification of any escaped burn or escaped burn smoke at the earliest practicable moment and promptly notify resources to suppress the escaped fire.
- **We need smoke free zones to protect our health. No burning within ½ mile of Residential Neighborhoods....**To reduce human suffering, protect our children, wildlife, recreation and commerce from the toxicity of agency burn smoke, no agency fuels reduction pile burning or prescribed burn should take place within 1/2 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, beehive or other smoke sensitive areas. **Agency burn smoke free zones need to be established.**
- **“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 state of the art mechanical smoke monitors as discussed earlier, be placed by burn agencies as a contingency to **immediately identify a failed “Smoke Management Plan”**. If smoke escapes beyond acceptable burn/smoke plan parameters then adequate resources shall be available 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 agency initial burn smoke including smoldering during 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 the direct effect of agency burn toxic smoke 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 burn 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 and wildland interface forest arson and tripled for such wildland arson undertaken by any public agency employee, former public agency employee or public fire volunteer or past public fire volunteer, or other private or corporate concern who, due to their affiliation with their training experience or public agency member, would have a higher knowledge of fire burn behavior and/or potential damage, or public safety fire 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 or falsify required application or permit 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.
- That the State of Nevada and California and the EPA take a more active role to require adequate and effective real time publicly transparent mechanical air 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, primarily from Douglas County, NV and El Dorado County, CA and **failed “Smoke Management Plans”** across the Sierra, both in California and Nevada.
- That burn agencies devote 75% of their fuels management budgets to state of the art chipping, grinding, hauling, real time and public transparent PM10, PM2.5 and Ozone monitoring as well as public outreach to “prevent” fires, smoke and atmospheric heat as well as providing early fire detection technology as well as creating an overwhelming cadre of specialized fire suppression resources in the Tahoe Basin between the months of May and December to help ensure swift and overwhelming early wildland fire suppression.

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