



April 27<sup>th</sup>, 2020

Randy Moore, Regional Forester  
USDA Forest Service, PSW Region 5  
1323 Club Drive  
Vallejo, CA 94592



Dear Randy,

We are writing to express our concerns over the prescribed fire burn ban recently put in place across the Forest Service units in Region 5 and its impact on forest resilience on public lands and adjacent communities in the wildland-urban interface due to increasing risk of wildfire damage as the 2020 fire season approaches.

We are very sensitive to the public health concerns over coronavirus exposure on the Forest Service workforce and concerns about public health impacts from smoke on those struggling with the symptoms of COVID-19 infection. At the same time, we think it is short-sighted to cancel burning during the spring prescribed burn window and lose the opportunity to protect communities and natural resources given the increasingly damaging wildfire trends in California, as well as the below-average precipitation experience across much of the state this year.

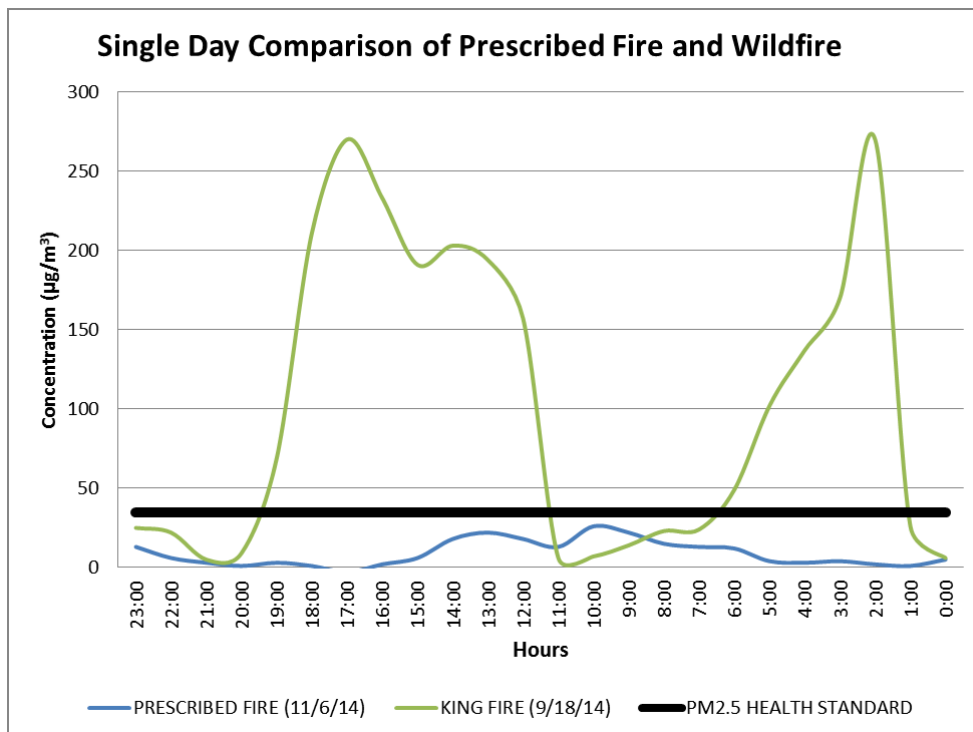


Figure 1: Daily fine particulate concentrations in Washoe County, Nevada of a prescribed fire as compared to a significant wildfire in California. Source: NWCG Smoke Management Guide to Prescribed Fire.

Governor Newsom recently cited three crises in California, not one: homelessness, wildfires, and COVID-19. Currently, we have the cleanest air anyone has seen in California in more than 20 years. We have all been advised to wear masks, and millions of Californians are generally staying indoors and at home. The majority of the California population has never been better protected against smoke. Prescribed fire emissions are generally marginal and short-term during prescribed burn events, especially considering their potential for offsetting emissions from future wildfires (see Figure 1 above).

CAL FIRE, as well as multiple private contractors, will be continuing to implement prescribed fires that are critical for community protection throughout the spring burn season. These fire practitioners are developing new protocols to ensure public and community safety that could be adapted for Forest Service burns. For example, workers on fire projects can be protected by wearing N95 masks or more advanced smoke protection gear and maintaining social distance, which is generally the case during planned fires.



**Figure 2: Burn pile on the Stanislaus National Forest.**  
Photo credit: John Buckley

The Forest Service can mitigate threats to vulnerable populations by prioritizing prescribed fire projects in remote areas where widespread smoke exposure is unlikely. National forests throughout California have plenty of shovel-ready projects that would provide immediate fire resiliency benefits during the approaching 2020 wildfire season if completed. For example, thousands of burn piles line highway corridors and other major

roads throughout the Stanislaus National Forest (see example in Figure 2). These piles will likely pose a major fire threat if ignited accidentally during peak fire season.

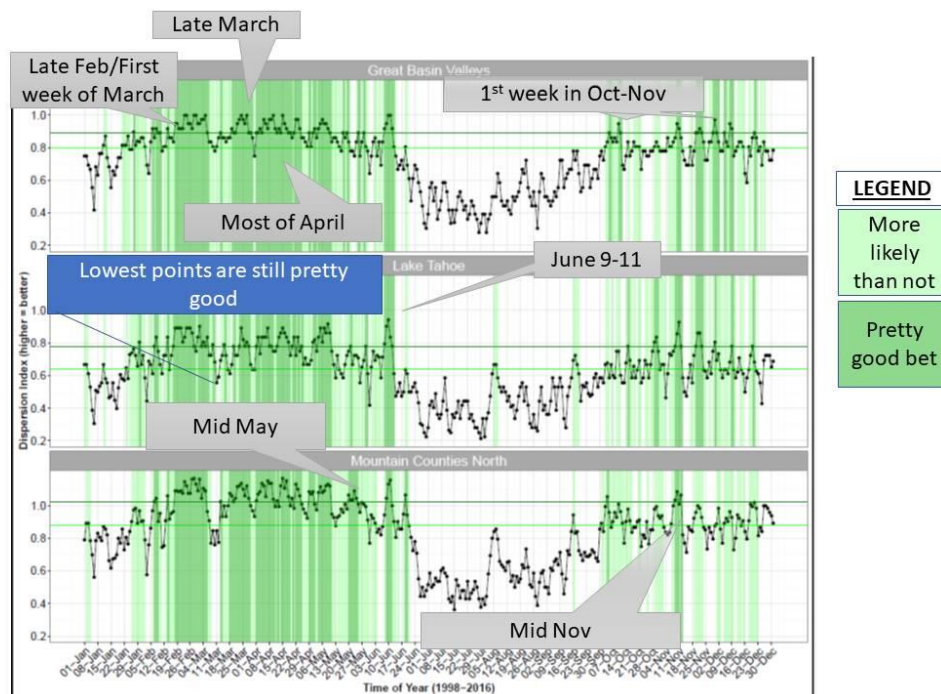


Figure 3: Best bets for air quality permits for prescribed burning in the central Sierra Nevada. Source: Lee Tarnay, USFS; Dar Mims, CARB.

The loss of a major burn window from April to mid-June 2020 risks another uncharacteristic wildfire season during a lower rainfall year. A combination of factors including resource availability, seasonal weather patterns, fuel moistures, and air dispersal conditions, have made this spring burn window increasingly important for prescribed fire implementation. Collaboration between air regulators and land managers within the Fire MOU Partnership shows that the period between April and mid-June is one of the most likely periods of the entire year for prescribed burners to receive a smoke permit from air quality regulators (see Figure 3 above).

The importance of the spring burn window is further underscored by recent meteorological research that found that extreme autumn wildfire conditions – such as those that fueled the destructive wildfire seasons of 2017 and 2018 – have doubled since the 1980s, and may further limit fall burning in the future (Goss et al. 2020, in press). It is certain that uncharacteristic wildfires lead to highly damaging mega-emissions. There are multiple research papers by Forest Service scientists and others specifically focused in California, and particularly in the Sierra Nevada, citing prescribed fire emissions as a much better “choice” for the inevitable public health smoke exposure in our naturally fire-prone California climate. See for example Schweizer and Cisneros 2017; Schweizer et al. 2017; Long et al. 2018.

We respectfully ask that you withdraw the ban on prescribed fire on the National Forests in California. We will actively support this decision with our own media outreach effort

and ask fire and air quality scientists to join in support. Please do not hesitate to contact Craig Thomas at 916-708-9409 or [craigthomas068@gmail.com](mailto:craigthomas068@gmail.com) if you have questions or would like to discuss further with our organizations.

Sincerely,

Craig Thomas, Director  
The Fire Restoration Group

Susan Britting, Executive Director  
Sierra Forest Legacy

Pamela Flick, California Program Director  
Defenders of Wildlife

John Buckley, Executive Director  
Central Sierra Environmental Resource Center

Nick Jensen, PhD, Lead Conservation Scientist  
California Native Plant Society

Steve Frisch, President  
Sierra Business Council

Julie Fair, Director of California Headwaters Conservation  
American Rivers

Laura Cunningham, California Director  
Western Watersheds Project

Matt Dietz, Lead Ecologist  
The Wilderness Society

Chris Morrill, Executive Director  
California Wilderness Coalition

Cc: Barney Gyant, Deputy Regional Forest-Natural Resources  
Anthony Scardina, Deputy Regional Forester-State and Private Forestry

## Citations

Goss, M., Swain, D., Abatzoglou, J., Sarhadi, A., Kolden, C., Williams, A.P., and Diffenbaugh, N. 2020. Climate change is increasing the likelihood of extreme autumn wildfire conditions across California. *Environmental Research Letters*, manuscript accepted.

Long, J.W., Tarnay, L.W. and North, M.P., 2018. Aligning smoke management with ecological and public health goals. *Journal of Forestry*, 116(1), pp.76-86.

Schweizer, D.W. and Cisneros, R., 2017. Forest fire policy: change conventional thinking of smoke management to prioritize long-term air quality and public health. *Air Quality, Atmosphere & Health*, 10(1), pp.33-36.

Schweizer, D., Cisneros, R., Traina, S., Ghezzehei, T.A. and Shaw, G., 2017. Using National Ambient Air Quality Standards for fine particulate matter to assess regional wildland fire smoke and air quality management. *Journal of environmental management*, 201, pp.345-356.

## Attachments

California Forest Management Task Force. Coronavirus Guidelines and Best Practices for Fuels Reduction Activities. March 31, 2020.

North Carolina State University. COVID-19 Social Distance and Hygiene Tips for Prescribed Burners. March 24, 2020.