



February 11, 2025

To: The Tahoe Regional Planning Agency (TRPA) Governing Board

RE: URGENT CONCERN – FAILURE TO PRODUCE A TAHOE BASIN WILDFIRE EVACUATION ANALYSIS

Key

Wildfire Evacuation Analysis or Analysis = A comprehensive roadway-by-roadway wildfire evacuation capacity timing analysis, based on the best available data, and best achievable technology, indicating how long it will take to get residents and visitors, under a variety of No-Notice wildfire evacuation¹ scenarios, and under 95th percentile red flag weather conditions².

Lake Tahoe Basin Wildfire = A fast moving fire potentially or directly impacting Lake Tahoe's built environment and population, driven by various combinations of influences, including but not limited to a vegetation fire originating inside or outside the Wildland Urban Interface (WUI), or Very High Fire Hazard Severity Zone, during 95th percentile red flag weather and/or slope conditions. This includes any fast-moving fire potentially or directly impacting Lake Tahoe's built community and population which starts or spreads from inside or outside the Lake Tahoe Basin built environment. In short, the

¹ A **no-notice wildfire evacuation** refers to an evacuation that occurs with little or no warning due to an unexpected or rapidly developing fire incident. These situations require quick action and immediate response because there is not enough time for emergency responders to prepare or for residents to receive advance notice. **No-notice evacuations** can be particularly challenging because they demand rapid assessment, quick decision-making, and efficient coordination to ensure the safety of affected populations. Examples of such incidents include wildfires that suddenly change direction and move toward populated areas. [USDOT FHA No Notice Evacuations](#)

² A **95th percentile red flag warning day** is a term used in fire weather forecasting. It indicates a day when the fire danger is extremely high, with conditions that are only expected to be exceeded 5% of the time under similar circumstances. Essentially, it means that the fire danger on that day is among the highest 5% of all days, making it critical to take extra precautions to prevent wildfires. [Red Flag Weather National Weather Service](#)

extent to which a fast-moving fire can potentially cause catastrophic damage to Tahoe's built environment and imperil public safety should not solely be assumed to be connected to vegetation ignition and spread.

TRPA = Tahoe Regional Planning Agency

IEC = Initial Environmental Checklist

Dear TRPA Governing Board,

The undersigned Lake Tahoe Basin conservation groups submit this letter of urgent concern under the backdrop of increasing numbers, extent and tragic losses connected with wildfires across California and northern Nevada during the last many months and years.

This, at a time when several Lake Tahoe Basin Area Plans and major projects are in various stages of TRPA review.

We remain deeply troubled that the TRPA continues to fail to produce a comprehensive roadway-by-roadway wildfire evacuation capacity timing analysis, based on the best available data, and best achievable technology, indicating how long it will take to get residents and visitors safely out of the basin. Nor has the TRPA utilized its regulatory influence to require such an analysis as a condition of approval in connection with Tahoe Area Plans and major projects.

NEITHER THE TRPA, ITS' REGIONAL PLAN GOVERNMENT "PARTNERS", OR ANY DEVELOPER, SHOULD BE ALLOWED TO MAKE IT HARDER FOR PEOPLE TO ESCAPE DEADLY FIRES³.

Our unique Lake Tahoe Basin roadway evacuation capability is geographically constrained, and the Lake Tahoe Basin Area Plans generally fall within 1) The WUI, and 2) Very High Fire Hazard Severity Zones (CA)⁴.

In the interest of the environment and life safety, we feel strongly that a requirement to complete a comprehensive wildfire evacuation analysis, as defined above, be part of the TRPA Code of Ordinances and must be a condition for any Area Plan and major project review and approval process. This, in order to transparently inform first responders, land use planners and the public

³ [No developer should be allowed to make it harder for people to escape deadly fires - January 6, 2022 Press Release Center for Biological Diversity Atty Peter Broderick](#)

⁴ [Link to CAL Fire High Fire Hazard Zone Viewer](#)

concerning the potential wildfire evacuation timing realities in connection with Tahoe’s constrained roadway system.

Therefore, based on our discussion herein, we urgently request the TRPA to:

1. Immediately, but temporarily suspend all current and future TRPA Area Plan Amendment approvals and major projects until a comprehensive Lake Tahoe Basin Evacuation Analysis, as defined above, is completed by the TRPA, and made part of the Area Plan and major project review process.
- OR**
2. Immediately, but temporarily suspend all current and future TRPA Area Plan Amendment approvals and major projects until a comprehensive Lake Tahoe Basin Evacuation Analysis, as defined above, is completed by each TRPA Area Plan “partner” agency, and made part of their individual Area Plans and major project application environmental review process.
 3. In addition to the temporary actions described above, sponsor an expedited TRPA Regional Plan Amendment, to require Area Plan holders and major projects complete a comprehensive Wildfire Evacuation Analysis as defined above, that must be part of the TRPA Area Plan and major project application and environmental review process, and require an update of the analysis to include the best available data every 12 months.

Unfortunately, after years of repeated public testimony by Lake Tahoe citizens and various conservation groups calling for a basin wide comprehensive evacuation analysis, TRPA and their Area Plan partners continue to fail to produce such an analysis. This, despite readily available up-to-date data and advanced technology at TRPA’s fingertips.

TRPA continues to state that it is not TRPA’s responsibility to create such an evacuation analysis, and that this task should be left up to the local agencies. Yet, local agencies continue to insist that they are prepared for wildfire, and offer forest thinning, prescribed burning, Unified Command drills and a recent Tahoe Regional Wildfire Evacuation Plan that is void of any comprehensive roadway evacuation capacity analysis.

Unfortunately, these wildfire preparation measures do not sufficiently satisfy transparently informing the public of wildfire risks, including evacuation timing, and do not adequately disclose the increased risks of future Area Plan and major project impacts associated with already existing public peril

roadway evacuation capacity baseline conditions. See [Bonta vs County of Lake CA First Appellate District Court Division Four here](#)⁵.

Absent an Area Plan, project or basin wide evacuation analysis, land use planners and the public continue to be denied a transparent opportunity to test, assess, and evaluate the direct or indirect effects from wildfire in connection with past, current, and future Area Plans or projects.

Through its inaction, TRPA continues to enable a dangerous circumstance, under which land use planners and the public are robbed of being able to make an informed judgment as to the true status of sufficient roadway wildfire evacuation capacity resulting from Area Plans and major projects.

For TRPA to continue to permit this critical public safety “gap” is simply unacceptable.

According to the CA Attorney General, regional wildfire evacuation plans often identify roles and responsibilities for emergency personnel and evacuation routes, but do not necessarily consider the capacity of roadways⁶, assess the timing for community evacuation, or identify alternative plans for evacuation depending upon the location and dynamics of the emergency. In fact, current basin plans are in direct contravention to the CA Atty General Best Practices.

Given the mounting tragic wildfire losses, going forward, and during the TRPA Area Plan and major project application and environmental analysis process, TRPA can no longer ignore the CA Attorney General Best Practices for Analyzing and Mitigating Wildfire Impacts, specific to wildfire evacuation modeling. Evacuation Analyses must include at minimum:

1. The capacity of roadways to accommodate project and community evacuation and simultaneous emergency access⁷.
2. Assessment of the timing for evacuation, including for residents and visitors, including trail users⁸.

⁵ [Bonta vs County of Lake CA First Appellate District Court Div Four](#)

⁶ Page 11, CA Atty [General Best Practices](#) for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act

⁷ Page 10 -Ca Atty General [Best Practices](#) for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act.

⁸ Page 10 -Ca Atty General [Best Practices](#) for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act.

3. Evaluation of the Area Plan impacts on existing evacuation plans⁹.
4. Traffic modeling to quantify travel times under various likely scenarios, but they should not limit themselves to past information, which may not reflect the impact of emergency conditions on travel times¹⁰.
5. Comparing other tragic wildfires, like the Camp Fire, each Area Plan analysis should be developed under a variety of roadway wide open and blocked scenarios during a fast moving no-notice wildfire evacuation, occurring during 95th percentile red flag warning conditions¹¹
6. Utilizing the most up-to-date data and best achievable technology, provide several evacuation timing modeling assessments per Area Plan¹² to determine population wildfire evacuation times and simultaneous emergency equipment access.
7. Once the Area Plan evacuation times are arrived at, the evacuation analysis should include a discussion regarding circumstances and conditions that may degrade the estimated evacuation times arrived at. At minimum, these discussions should include potential degradation of evacuation times from:
 - Loss of cell capability,¹³ and loss of power,¹⁴ and downed power poles and power lines,
 - A discussion regarding evacuation impacts from multiple additional fires caused by ember storms during a 95-percentile fire spread situation under red flag conditions,¹⁵
 - An hour-by-hour estimation of emergency resources arrival times, including types and numbers of emergency response equipment, including fire apparatus, law enforcement vehicles and utility company vehicles and their impact on evacuation under Tahoe's constrained roadway capacity¹⁶.

⁹ Page 10 -Ca Atty General [Best Practices](#) for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act

¹⁰ Page 10 -Ca Atty General [Best Practices](#) for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act.

¹¹ Page 12 Camp Fire Report - the Camp Fire was particularly unpredictable due to the weather conditions. Due to spot fires being picked up by strong wind gusts, the fires were rapidly spreading from all ends and at multiple locations simultaneously due to ember ignition. The speed of the fire affected evacuation routes, closing in cities and blocking off exits.

<https://www.buttecounty.net/DocumentCenter/View/3849/Camp-Fire-After-Action-Report-PDF?bidId=>

¹² Page 1 Independent Lake Tahoe Basin Wildfire Evacuation Analysis

<https://drive.google.com/file/d/18fRMqrc1XvCfz9235iqEJ1imDYgMSyNd/view>

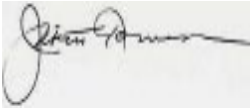
¹³ Davis Fire - NV Energy de-energized lines to the fire zone, and several local news stations lost on-air broadcasting capabilities for several days. This included loss of cell phone service. [Davis Fire Timeline, Recap, and Resources | Washoe Life](#)

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¹⁵ Flying embers during the recent Los Angeles fires, **small airborne embers** were a major factor in the rapid spread of the wildfires. These embers, carried by strong winds, could travel for miles and ignite new fires in previously unaffected areas. Experts noted that **most homes destroyed by the wildfires were ignited by these airborne embers** rather than being directly overtaken by flames. [Embers AP News](#)

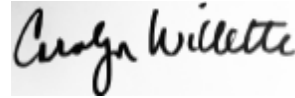
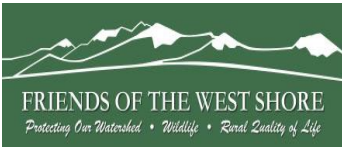
¹⁶ During the first 6 hours of the Camp Fire, incident command ordered **approximately 60 fire engines** to respond to the rapidly spreading wildfire. This was part of a massive mobilization effort to protect the affected communities and attempt to control the blaze. [Small airborne embers play a big role in the spread of wildfires | AP News](#)

- Impacts from medical aid calls¹⁷, and
- Impacts from main arterial roadway shoulder parking and abandoned vehicles and Impacts of dense smoke on populations and the relationship between dense smoke on panic, reduced vision, heart lung health impacts, and the disadvantaged¹⁸.



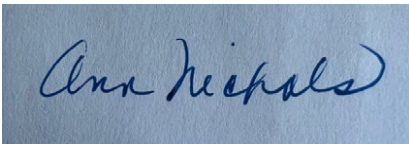
Judi Tornese, President

FRIENDS OF THE WEST SHORE



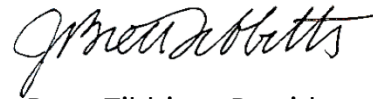
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NORTH TAHOE PRESERVATION ALLIANCE



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TAHOE EAST SHORE ALLIANCE



Doug Flaherty, President

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¹⁷ Camp fire – The Camp fire overwhelmed emergency resources including medical aid. The large number of people affected led to a surge in medical aid calls, which strained the capacity of emergency responders Many residents required immediate medical attention for injuries, smoke inhalation, and other health issues caused by the fire. The overwhelming demand for medical aid highlighted the need for better emergency preparedness and resource allocation in such large-scale disasters.

¹⁸ Roadway shoulder parking and abandoned vehicles Los Angeles Fires [Bing Videos](#)

Camp Fire - many people abandoned their vehicles as they tried to escape the rapidly advancing flames forced residents to leave their cars and continue on foot. This was reported by multiple news sources, including **KRCR** and **Paradise Post**. SF Gate reports fire surrounded evacuation routes and drivers panicked, some crashing and others abandoning their vehicles to try their luck on foot. Five people were found dead in vehicles on a main thoroughfare heading out of Paradise. [SF Gate](#)