

**ATTACHMENT Q**  
**REQUIRED MANAGEMENT ACTIONS FOR PILE BURNING**  
**WITHIN STREAM ENVIRONMENT ZONES UNDER 2024 TIMBER**  
**WAIVER CATEGORY 6**

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Conditional Waiver of Waste Discharge Requirements from Waste Discharges Resulting from Timber Harvest and Vegetation Management Activities in the Lahontan Region

Activities that involve Pile Burning in SEZs under Category 6 of the 2024 Timber Waiver must meet the following requirements. These requirements have been designed to meet Basin Plan exemption criteria required to grant an exemption to waste discharge prohibition for Activities that include slash piles burning within SEZs for erosion control projects, habitat restoration projects, wetland rehabilitation projects, SEZ restoration projects, and similar projects, programs, and facilities.

For Pile Burning within an SEZ, complying with the requirements below is a condition of eligibility for the exemption, provided in Attachment N, from the Basin Plan Prohibition against the discharge, or threatened discharge, attributable to human activities of any waste or to SEZs in the Lake Tahoe Basin. Dischargers who cannot meet these requirements are not covered under the Basin Plan Prohibition Exemption granted in Attachment N of this 2024 Timber Waiver and must apply for a separate Basin Plan prohibition exemption.

**SEZ Requirements:**

- a. Active ignition of broadcast burns must not occur within an SEZ
- b. Burn piles must not be located within 25 feet of any Waterbody.
- c. No more than 30% of any acre SEZ acre, or smaller contiguous SEZ area, may be occupied with piles.
- d. No more than 15% of any SEZ acre, or other contiguous SEZ area which is less than one acre, can have burn scars at any time which do not have vegetative and surface cover recovery, as defined in Attachment A (i.e., not invasive weeds).
- e. All burn scars must either 1) have native duff, or organic mulch and seed raked into the scar to a minimum 85% soil surface coverage as soon as the burn is completely extinguished, or 2) have native duff, or organic mulch and seed raked into the scar to a minimum 85% coverage if the scar does not display Vegetative and Soil Surface Recovery (as defined in Attachment A) within two growing seasons following the burn.

Duff or mulch/seed raking is intended to facilitate vegetative recovery of the site, limit the opportunity for invasive species re-colonization of the impacted area, increase natural infiltration, and prevent soil erosion. Project implementers that elect option 2) must monitor burn scars and report on Vegetative and Soil Surface Recovery using Timber Waiver

- monitoring and reporting forms until Vegetative and Soil Surface Recovery is determined to be adequate by the Water Board Executive Officer.
- f. Burn scars that exceed either a 25-foot diameter or 500 contiguous square feet shall have native duff, or organic mulch and seed raked into the scar to a minimum 85% coverage. The duff or mulch/seed raking is intended to facilitate vegetative recovery of the site, limit the opportunity for invasive species re-colonization of the impacted area, increase natural infiltration, and prevent soil erosion.
  - g. All burn scar raking under option 1) in d. above, or to address large burn scars in e. above, must occur as soon as the burn is completely extinguished. In the event the burn scar and surrounding ground is covered by ice or snow, the required raking must occur by June 1 following the burning.
  - h. After initial ignition of piles, but while still burning, allow each pile to be re-piled once (i.e., place large unburned pieces back into the burning pile). Additional re-piling will be allowed if necessary to achieve 80% consumption of the piled material.
  - i. When piles are adjacent to aspen trees, re-piling during pile burning must be restricted to one time per pile and hot piling (i.e., don't feed one pile with the material from other piles or ground material) is prohibited.
  - j. Areas burned within SEZs must be left in a condition such that waste, including ash, soils, and/or debris, will not discharge to a waterbody.

The following section contains recommendations that are meant to aid project implementers seeking additional example design features for piling and burning in SEZs.

**Recommendations:**

1. When piling the material, distribute the large wood component (> 9 inch diameter logs) so each pile contains less than 40%, by volume, large wood. A smaller volume of large wood component typically will result in lower burn temperatures and shorter burn durations, thereby minimizing adverse effects to the underlying soil.
2. Prior to pile construction, rake native duff away from the area where the pile will be constructed so that it can be raked back onto the burn scar after burning. This action is intended to ensure that sufficient native duff is available to cover the burn scar after the pile, and any adjacent area that may be subject to fire creep, has been burned.
3. Place piles in a non-linear pattern in each unit where possible.
4. Maximize the distance between piles to the extent feasible, maintaining approximately 20 feet average spacing between piles.
5. Burn or remove piles as soon as possible, giving preference to those piles within SEZs.
6. Allow fire to creep between piles and into these buffers, maintaining flame lengths of less than 2 feet in height except where sensitive plant occurrences, wetlands, and noxious or invasive terrestrial plants are present.