



July 26, 2018

Bob Webb,
Washoe County Community Services
Planning and Development Division
PO Box 11130
Reno, NV 89520-0027

RE: Agency Position, October Lantern Festival;

Dear Mr. Webb,

Thank you for forwarding the request for use of an open flame device for the Lantern Festival to be held at Wild West Motor Sports Park sponsored by Happy Fun Events LLC. The Lantern Festival is an outdoor festival where community participants are given paper lanterns to release to atmosphere by the developed heated gases produced by an open flame within the lantern. Once the lantern leaves the hand of the person it is uncontrolled to the environment.

Upon review, Truckee Meadows Fire Protection District is NOT able to approve the use of an open flame device as described. The proposed uses of open flaming devices are not permitted by the 2012 International Fire Code section 308, Open Flames. The code does not permit a person to throw or place flaming or glowing substance or object on any surface that can cause an unwanted fire (308.1.2). The code further restricts the handling of handheld candles and prohibits the transfer from one person to another while lit (308.1.7). To further support TMFPD position, language can be found in the 2015 and 2018 IFC 308.1.6.3 that specifically addresses "Sky Lanterns" that states, "A person shall not release or cause to be released an untethered sky lantern."

Currently the Nevada State Fire Marshal and the Northern Nevada Fire Marshals have amended the 2018 International Fire Code to **prohibit** the use of "Sky Lanterns", which is planned for adoption and enactment this year. To further support this restriction National Fire Protection Association has provided the following language

"NFPA 1, Section 10.10.9.3 states "The use of unmanned, free-floating sky lanterns and similar devices utilizing an open flame shall be prohibited." The potential hazard posed by sky lanterns is that once ignited and released, the device becomes an uncontrolled, flying ignition source, whose direction of travel is dependent on the wind direction, which can change unpredictably. Although the combustible fuel load of the device itself might be small, the potential exists for the device to ignite vegetation or other combustibles in the area and cause a significant fire if it is not quickly extinguished."



In support of this position and as previously discussed on May 22, 2018 a grass fire was ignited by a small amount of molten material that was released from a fuse on a power pole just South of Mustang. The material was not larger than a quarter. This fire was ignited on a day that experienced rain showers just hours prior. With the current weather track and the experienced drying it is not expected that October will be any different. Below is the information received from Chris Smallcomb, NWS Reno Meteorologist (PIO), as a response to my request for historical weather for the area.

October is a big transition month for the Reno area. Often October is quiet and mainly dry with occasional breezy days that may prompt Red Flag fire weather warnings. These scenarios are usually seen 2-4 days in advance. But some Octobers can be quite stormy with early-season winter storms and atmospheric rivers that have lead-times roughly 4-7 days out. This was recently evidenced in October 2016 with a major storm bringing strong winds to 80 MPH fueling the Little Valley wildfire followed by flooding rains. A smaller subset of Octobers can turn cold quickly with early season light snow in the valleys including lake effect snow. While this snow doesn't stick around long it can result in brief travel hazards.

Here are some stats for the Reno Airport since 1990 focusing on the October 1-15 period:

High temperatures: average 72-74 with maximum 93
Low temperatures: average 42-45 with minimum 24
Risk of seeing measurable rainfall 0.01" or more: 11%
Risk of seeing more appreciable rainfall 0.1" or more: 7%

Wind data doesn't have as long of an archive but for the past few Octobers here are the peak gusts:

2017 - 52 MPH
2016 - 51
2015 - 41
2014 - 60
2013 - 41

Fuel, topography and fire hazard classification is predominately grass and sage brush. Mountain slopes and lack of fire roads and fire breaks do not support fire operations within the area and would result in air support to address fire in this area. As seen in this fire season, fires have been larger than usual due to weather patterns and moisture content of fuels, GIS rating for the area is "moderate". Limited available water is found in the area. Fire Operations would have to rely on water systems that are some distance from the area. Due to the remoteness to the areas supporting water systems, interruptions in operation tempo would result in drive time to refill apparatus.



TMFPD is open to reviewing other options for the support of the event. It is the opinion of this District that the risk of fire is too great and would have considerable impact to NV Energy transmission lines, Interstate 80, Storey County communities and Washoe County business partners in the area.

Please do not hesitate to contact me should you have any further questions or submittals.

Sincerely,

Lisa M. Beaver, PE, CFM, CBO

Deputy Fire Chief

Truckee Meadows Fire Protection District

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