



U.S. Department of Homeland Security
FEMA Region 9
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Oakland, CA 94607

FEMA

February 19, 2025

Nancy Ward
Governor's Authorized Representative
California Governor's Office of Emergency Services
3650 Schriever Avenue
Mather, California 95655

Reference: Post-Fire Soil Testing for Los Angeles County
FEMA-4856-DR-CA

Dear Ms. Ward:

The letter responds to your correspondence of February 19, 2025 and provides current and historical information on FEMA's post-fire soil testing actions in California, specifically as it relates to the major disaster declaration for the State of California as a result of wildfires and straight-line winds in Los Angeles County, FEMA-4856-DR-CA.

Over the past 5 years of California wildfire events, FEMA has not funded soil testing on properties impacted by fires. FEMA, in consultation with the U.S. Environmental Protection Agency, has consistently determined in California that removing the top 3-6 inches of soil beneath fire debris is sufficient to address fire-related contamination and protect public health. Up until 2018, FEMA's policy was to initially remove 3 inches of soil and then test it before removing an additional 3 inches of soil and testing it again. This practice was tedious, inefficient, and a barrier to timely clean up and recovery. Furthermore, such testing efforts across various wildfire events in California showed that any positive results from testing were primarily due to contaminants in the soil pre-fire, not due to the declared fires themselves.

Because of this, FEMA's position since 2020 has been to fund the removal of the full 6 inches of soil right away but not fund any further testing. Anything beyond 6 inches is considered "over excavation" which FEMA has determined is unrelated to the wildfires, time consuming, costly, and slows economic recovery within fire-impacted communities. This is consistent with FEMA practices in surrounding states after recent wildfire events.

After the 2018 Camp Fire, when the decision was made to update FEMA's practices in accordance with historical findings, EPA supported this change. EPA stated that in its experience, "removal of debris, ash, and an additional three to six inches of soil underlying the debris will necessarily abate threats from the debris." To err on the side of caution, FEMA implemented the practice of removing the full 6 inches of soil, rather than 3.

A soil removal depth of 3 inches below ground surface will remove any potential immediate threats to public and environmental health. For the Los Angeles Fires, FEMA has tasked the U.S. Army Corps of Engineers (USACE) to conduct Private Property Debris Removal (PPDR) for property owners who opt into the federal program. This tasking includes removal of 6 inches of soil as a conservative action under emergency response. Further excavation and comparison to residential soil clean up goals are related to economic recovery and restoration activities and are not related to response for public or environmental health concerns. In addition, the Public Assistance Program and Policy Guide specifically states that soil testing for the purpose of long-term cleanup actions is ineligible. PAPPG v.5 p. 136.

Soil testing would delay recovery by several months. However, FEMA does not prevent the State, local governments, or individual property owners from conducting soil testing if they wish to do so. FEMA will not reimburse the costs for soil testing unless testing shows that positive results are clearly attributed to the fires.

Historically, the State has conducted and covered the costs for soil testing after various fires, including for the presidentially declared wildfires in 2020 and 2021. Impacted counties in California have also conducted and covered the costs for soil testing after various non-federally declared disasters. In all these efforts, FEMA did not reimburse the costs of testing because positive results were not attributed to the fires.

FEMA remains focused on ensuring safe, efficient, and timely cleanup for the Los Angeles fires. The priority is to accelerate recovery, and aside from soil testing not being efficient or necessary to mitigate immediate threats to public health, it would significantly delay clean up and recovery. We encourage the State to conduct soil testing if they wish to do so but are confident that our current practices speed up recovery while protecting and advancing public health and safety.

Sincerely,

Curtis Brown
Federal Coordinating Officer
FEMA-4856-DR-CA

cc: Robert Fenton, Regional Administrator, FEMA Region 9
Eli Owen, Alternate State Coordinating Officer, FEMA-4856-DR-CA
Joe Engler, Regional Recovery Division Director, FEMA Region 9