

REPORT ON STAFF'S PROGRAMMATIC REVIEW OF THE LAKE COUNTY AIR QUALITY MANAGEMENT DISTRICT'S SMOKE MANAGEMENT PROGRAM

To evaluate the practical application of the proposed criteria, the staff conducted a programmatic review of the Lake County Air Quality Management District's (Lake County AQMD or District) smoke management program, one of the well run local programs in the State and one in a position to request approval for an alternative burn authorization system. According to section 80145(b), as amended, approval requires consideration of several factors. They are listed below along with our findings for Lake County AQMD.

1. The rules and regulations of the district relating to agricultural burning.

The Lake County AQMD's rules are concise, specific, and brief. They incorporate many best practices for smoke management. All of the smoke produced in this basin on any day is treated as a whole and managed by components causing the smoke. Table 9 of section 1100 provides maximum acres or tonnage for each of the three watersheds in the basin. Although at the outset, the amounts of burning appear to be large, they may be adjusted by the fire control agency or the Lake County AQMD based on air quality and fire control conditions.

In section 1150, paragraph D, "The amount of total acreage may be limited by the District if prevailing meteorology and air quality, or the type of planned burn, threatens serious air quality degradation or violation of Ambient Air Quality Standards." And, in practice, the amount of burning is reduced on many days to avoid air quality impacts. The District often uses a "Limited Burn Day" to match emissions from burning to the few hours of the day with the best dispersion.

2. Historical data on the amount, types and locations of agricultural burning.

The Lake County AQMD collects sufficient information to produce a detailed annual report on agricultural burning.

3. The impacts of agricultural burning on the district.

Lake County AQMD is in attainment for particulate matter. Public complaints of smoke from burning in the District have been limited.

4. The effectiveness of the smoke management program in place in the district.

The needed agricultural burning is accomplished annually in this air district with only a very minimal, occasional, minor smoke impact.

Section 1300 of the Lake County AQMD's Agricultural Burning Rules covers open burning in the growing of crops. Paragraph F of this section specifies, "Maximum care must be taken to keep smoke from drifting into populated areas..." The maximum care admonishment appears in five different sections of the document.

Enclosure 1

Because of energetic management, burners and staff are focused on this with special care. As an example, the District has a complaint response system that will direct calls to a staff person any hour of the day or night.

Significant burns are flagged on a large wall map in a hallway so inspectors leaving the office will be aware of smoke sources in the basin.

Also from section 1300, "Wind direction, topography, thermal inversion and population density shall be considered to minimize smoke reaching nearby populated areas."

The district uses remote weather facilities near Clear Lake and at elevations such as the top of Cow Mountain and on Mount Konocti to monitor temperature inversions every day. In a high traffic area in the District office, a computer terminal continuously updates local weather conditions (including winds, temperatures and visibility).

Even conditions for granting economic exemptions include the consideration of meteorological conditions and the likelihood of air quality degradation. Section 1350 is specific to tule burning. A time specific (hour and day) permit is required and will be given only when desirable meteorological conditions are expected for the time of the burn. The District may elect to delay the burn to preserve air quality. During the staff's visit, a local rancher stated that he has permanently cancelled plans for a tule burn near Lakeport because it was too hard to be sure that no smoke impacts would occur.

5. Other documentation.

The Lake County AQMD staff described its community relations program which included volunteer groups working with the Lake County AQMD and its Board, the management training and technical skills of its smoke managers, and special recognition of the staff by the community and professional societies. Additionally, the Lake County AQMD has a meteorologist on its staff who is involved in daily smoke management issues and reviews smoke impacts in order to prevent future problems.

Based on the results of this review, the Air Resources Board Executive Officer could reasonably conclude that the Lake County AQMD program has achieved the objectives of the daily burn authorization system in title 17, CCR, as amended, and will continue to do so in the future.