

SAMPLE FINDINGS LETTER FROM AG COMMISSIONERS

Date XXX

Sacramento Valley Basinwide Air Pollution Control Council
XXXX
Chico, California XXXX

Subject: Consultative Findings on Prevalence of Rice Disease Levels

Dear XXXX:

In accordance with the Sacramento Valley Basinwide Air Pollution Control Council's Conditional Rice Straw Burning Program ("Program"), pursuant to California Health and Safety Code 41865(e), the Sacramento Valley Agricultural Commissioners are writing to report our consultative findings regarding the prevailing levels of qualifying rice diseases (stem rot, aggregate sheathspot, blast). Beginning in 2010, we are required to report to the Sacramento Valley Basinwide Air Pollution Control Council once every five years to certify there are adequate disease levels in the fields to justify 25 percent burning.

To provide us with sufficient technical discovery on these matters, we initiated Step 2 of your adopted 2010 Disease Evaluation Protocol. This required a technical consultation with University of California Cooperative Extension Rice Farm Advisors, which occurred on June 29, 2010.

In general, we are unaware of any evidence that would lead us to conclude that the prevailing levels of rice diseases have decreased over the past five years. In fact, the technical experts we conferred with have led us to believe that levels are probably higher. However, it should be noted that very limited sampling activity was implemented, therefore, this statement is primarily qualitative and based mostly upon general field observations and other information.

In summary, the general conclusions of our technical consultation with the UCCE Rice Farm Advisors are as follows:

- All three of the UC Farm Advisors consulted had a shared perspective, based upon their respective professional judgment, that qualifying rice diseases are at or above levels seen five years ago.

- Field plots managed by UC researchers for other studies have shown no obvious signs that disease levels have decreased.
- Since burning is a known effective control of these diseases, especially diseases caused by pathogens that overwinter in crop residue, these experts expect no significant reduction in these disease levels after years of reduced burning.
- On average, use of the fungicide Quadris to manage stem rot, aggregate sheath spot and blast is up over 400 percent since 2000.
- Limited samples have been taken annually in Yolo County over the past five years showing increased disease levels and 100 percent of sampled fields qualifying for burning.

Based upon our consultation with the University of California experts, the Sacramento Valley Agricultural Commissioners find that adequate levels of qualifying rice diseases exist throughout the Sacramento Valley to justify up to 25 percent burning. We do not believe that additionally sampling is needed to support this finding at this time. In making this finding, we recognize that growers wishing to burn for disease control must still be granted a rice straw burning permit from their county air pollution control district in order to burn any rice fields in the Sacramento Valley.

If you have any questions, please contact _____ at _____.

Sincerely,

[sign-on list of ag commissioners]