

June 4, 2010

James Goldstene, Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95812

Re: Submittal of 2010 Smoke Management Program Plan and Application of Acreage Updates

Dear Mr. Goldstene:

The Sacramento Valley Basinwide Air Pollution Control Council (BCC) adopted the 2010 Smoke Management Program (SMP) Plan on June 4, 2010 with no changes from the previous 2009 SMP Plan. The policies and procedures contained in the existing SMP Plan have worked well in protecting valley air quality. Sacramento Valley air district personnel in coordination with the ARB Meteorology Section staff have effectively managed the open burning of agricultural residues.

A salient element of the SMP Plan is the application of acreage updates related to improving meteorological and air quality conditions. Open burning is restricted whenever meteorological and/or air quality conditions are unfavorable. Alternatively, acreage updates and increased burning are allowed when atmospheric dispersion is better and air quality is not adversely affected. The update procedures have been successfully implemented many times in past years. The BCC wants to emphasize the importance and air quality value of acreage updates to the entire valley, individual air districts and specific burning management zones. Smoke Management Program elements regarding the application of updates include:

Timing and review of burn allocation decisions and acreage updates Acreage allocation decisions are made close to the actual burning times in order to improve forecast reliability. The Program also requires routine review of burning, meteorology, and air quality conditions throughout the day. If warranted, acreage updates can be requested or burning curtailed.

Spatial management of burning ~~{tc "Spatial management of burning"}~~When meteorology and/or air quality is more favorable in one or more areas, additional acreage will be placed in those areas or directly to a zone(s) within a district around the valley but such re-distribution shall never over concentrate the acreage in any part of the valley.

Updated ARB acreage allocation The ARB and the SMPC may consult and jointly decide to update the initial, interim, or maximum allocation after they have received new air quality and meteorological data and reports from district field observations that represent conditions after morning burning. Allocation updates shall be available only when air quality and meteorological data indicate.

Initial allocation During the fall burning season the ARB and SMPC will consult on daily meteorological and air quality conditions, prior to the ARB allocation decision, to determine the appropriate initial basinwide acreage allocation for the day.

Interim allocation After the initial basinwide acreage allocation is determined for regular burn days, the SMPC may issue acreage updates to districts, at their request, up to the next, interim basinwide allocation limit of 4,000, 7,500, or 10,000 acres. Coordination is required between the ARB and SMPC to exceed the interim limits. At the 4,000 and 7,500 acre thresholds the Meteorology Section makes the decisions so that a prompt response is given to the SMPC.

Maximum theoretical allocation The acreage allocation permitted by the applicable equation can only be exceeded if an updated allocation is given by CARB.

No-burn days No burning will be declared, in certain burning management zones or on Spare The Air days as specified in the Administrative Policies section of this Program.

Conservative burn management Districts shall use air quality and meteorological data provided to assist them in making decisions as to where in their burning management zones and when, within the authorized burn hours, to allow burning.

Attached is the 2010 Smoke Management Program Plan. If you have questions or comments on the SMP Plan please contact the Smoke Management Program Coordinator, Les Fife at (530) 668-1559.

Regards,

Glenn Hawes, Chairman
Sacramento Valley Basinwide Air Pollution Control Council