

# SACRAMENTO VALLEY

## BASINWIDE AIR POLLUTION CONTROL COUNCIL

					Chair	Vice-Chair		
Butte	Colusa	Feather River	Glenn	Placer	Sacramento	Shasta	Tehama	Yolo-Solano

### **\*\*MEETING NOTICE\*\***

Date: August 1, 2025

Time: 10:00 AM

Location: Shasta County AQMD  
1855 Placer Street, Suite 101  
Redding, CA 96001

Alternate  
Locations:

Butte County AQMD  
629 Entler Avenue, Suite 15  
Chico, CA 95928

Colusa County APCD  
100 Sunrise Blvd, Suite F  
Colusa, CA 95932

Feather River AQMD  
541 Washington  
Yuba City, CA 95991

Glenn County APCD  
720 N Colusa Street  
Willows, CA 95988

Office of Councilmember Guerra  
New City Hall  
915 I St 5<sup>th</sup> Floor  
Sacramento, CA 95814

Placer County APCD  
110 Maple Street  
Auburn, CA 95602

Sacramento-Metropolitan AQMD  
777 12<sup>th</sup> Street, 3<sup>rd</sup> Floor  
Sacramento, CA 95814

Tehama County APCD  
1834 Walnut Street  
Red Bluff, CA 96080

Yolo-Solano AQMD  
1947 Galileo Court, Suite 103  
Davis, CA 95618

Join Zoom Meeting

<https://us02web.zoom.us/j/83559311263?pwd=3FlgAe1dg8yanbxVKFWxahebgMnO.1>

Meeting ID: 835 5931 1263

Passcode: 560730

Phone: +1 669 900 9128 US (San Jose)

### **AGENDA**

#### **ITEM NO.**

#### **1. Call to Order / Introductions**

Roll Call to be led by BCC Secretary-Treasurer.

**2. Period of Public Comment**

**3. Approval of Minutes – BCC Secretary-Treasurer**

Recommended action: approve minutes from June 6, 2025 BCC meeting (motion needed).

**4. Financial Status Report**

Recommended action: receive Financial Status Report as of June 30, 2025 (motion needed).

**5. Approve Auditor – BCC/TAC Secretary-Treasurer**

Recommended action: approve auditor on recommendation of committee (motion needed).

**6. Status Reports**

- |   |                     |
|---|---------------------|
| • Basinwide Control Council (BCC) Members Report:                       | BCC Member          |
| • California Air Pollution Control Officers Association (CAPCOA) Report | CAPCOA Board Member |
| • Broader Sacramento Area (BSA) Report                                  | BSA Member          |
| • California Air Resources Board (CARB) Liaison Report                  | CARB Representative |
| • Technical Advisory Committee (TAC) Report                             | TAC Chair           |
| • Smoke Management Program (SMP) Report                                 | SMP Coordinator     |

**7. Annual Reports: Allowable Rice Burn Acres and Conditional Rice Burning Reports**

Receive updates from SMP Coordinator (motion needed).

**8. Fee Structure Review – Joe Tona**

An explanation of how the BCC calculates annual member district contributions.

**9. Uniform Permitting Efforts for Mobile Biomass Units – TAC Members**

- a. Meeting with Caribou Biofuels to learn about their business model and permitting needs.
- b. Review progress on uniform permitting efforts.
- c. Feasibility of utilizing regional or state program (similar to PERP).

**10. Biomass Utilization – TAC Members**

- a. SB 88 Progress – Sacramento-Metro
- b. Biomass-related projects

**11. Set Next BCC Meeting Agenda – October 3, 2025 Hosted by: Tehama County APCD**

**12. Adjourn Meeting**

MEETING AGENDAS ARE POSTED BY EACH MEMBER AIR DISTRICT OF THE SACRAMENTO VALLEY BASIN AND AT THE SVBCC WEBSITE LISTED BELOW.

Meeting information can be viewed at [www.airquality.org/SVBCC](http://www.airquality.org/SVBCC)

Questions, comments, and correspondence may be directed to:  
Sacramento Valley Basinwide Air Pollution Control Council  
Laurie LaGrone, Secretary-Treasurer  
629 Entler Avenue, Suite 15  
Chico, CA 95928  
530-332-9400 ext. 105  
[bcctacsecretary@gmail.com](mailto:bcctacsecretary@gmail.com)

# Sacramento Valley Basinwide Air Pollution Control Council

**Title:** Approval of Minutes

**Presenter:** BCC Secretary-Treasurer

**Recommended action:** approve minutes from the June 6, 2025 special BCC meeting (motion needed).

## ATTACHMENTS:

Description

2025-06-06\_BCC\_Special Meeting Minutes\_DRAFT

Upload Date

7/28/2025

Type

Supporting Documents

# SACRAMENTO VALLEY

## BASINWIDE AIR POLLUTION CONTROL COUNCIL

					Chair	Vice-Chair		
Butte	Colusa	Feather River	Glenn	Placer	Sacramento	Shasta	Tehama	Yolo-Solano

### Special Meeting Minutes – June 6, 2025

#### 1. Call to Order/ Introductions

A special meeting of the Sacramento Valley Basinwide Air Pollution Control Council was called to order at 1:15 pm by Chair Eric Guerra and a quorum established. Those present were as follows:

PRESENT:

Butte County AQMD: Doug Teeter, BCC Member  
Colusa County APCD: Randy Wilson, BCC Member  
Feather River AQMD: Brian Abe, BCC Member  
Glenn County APCD: Grant Carmon, BCC Member  
Placer County APCD: Richard Pearl, Alternate BCC Member  
Sacramento-Metro AQMD: Eric Guerra, BCC Chair  
Shasta County AQMD: Kevin Crye, BCC Vice Chair  
Tehama County APCD: Pati Nolen, BCC Member  
Yolo-Solano AQMD: Angel Barajas, BCC Member

Butte County AQMD: Stephen Ertle, TAC Member  
Colusa County APCD: Anastacia Allen, TAC Member  
Feather River AQMD: Chris Brown, TAC Member  
Glenn County APCD: Marcie Skelton, TAC Member  
Placer County APCD: Erik White, TAC Member  
Sacramento-Metro AQMD: Alberto Ayala and Amy Roberts, TAC Members  
Shasta County AQMD: Rob Stahl, TAC Member  
Tehama County APCD: Joe Tona, TAC Chair  
Yolo-Solano AQMD: Gretchen Bennett, TAC Vice Chair

*Smoke Management Plan Coordinator: absent*  
CA Air Resources Board: Adam Gerber  
BCC Secretary-Treasurer: Laurie LaGrone

#### 2. Period of Public Comment

Chair Guerra opened the meeting to public comments. Hearing none, the item was closed.

#### 3. Approval of Minutes from the February 7, April 2 and April 3, 2025 Meetings

**MOTION:** On a motion from Ms. Nolen, seconded by Mr. Abe, the minutes from all three meetings were unanimously approved as presented in a roll call vote.

#### 4. Financial Status Report

Ms. LaGrone provided a summary of the financial status report as of April 30, 2025.

**MOTION:** On a motion from Mr. Carmon, seconded by Ms. Nolen, the financial status report was unanimously approved in a roll call vote.

#### 5. Draft Budget - BCC Secretary-Treasurer

The draft budget for FY2025-26 was presented for approval.

**MOTION:** On a motion from Ms. Nolen, seconded by Mr. Barajas, the budget was unanimously approved in a roll call vote.

Chair Guerra requested a report at the August 1<sup>st</sup> BCC meeting of how the BCC calculates the annual contributions of member districts.

**6. Permitting Discussion – Gretchen Bennitt**

Ms. Bennitt and Ben Beattie of Yolo-Solano AQMD explained the permit process for stationary source and authority to construct permits; other member districts added information as well.

Chair Guerra requested that CARB Liaison Gerber find out CARB's position regarding permitting Burn Bots and other mobile incinerators, such as Caribou Biofuels Inc.'s Mobile Gasification Unit.

Action items for the TAC group resulting from this discussion:

- a. Organize a meeting with industry representatives to discuss the permitting process.
- b. Discuss potential model rule development.
- c. Look into a regional or state program, like PERP, that could be utilized for uniform permitting.

**7. Biomass Utilization – TAC Members**

The Board thanked Colusa County APCD for an excellent and informative dual field trip.

SB 88 passed the floor vote in the State Senate this week and moves on to the State Assembly. There are plans to send more support letters. Other than some cost reduction from the Finance Committee there has been very little opposition.

**8. Status Reports**

- **Basinwide Control Council (BCC) Members Report** – no report.
- **California Air Pollution Control Officers Association (CAPCOA) Report** – Joe Tona  
At the annual Spring Conference a week before, two types of linear generators were demonstrated. Present at the conference were Chair Randolph, Matt Lincoln, and members of CARB executive leadership.
- **Broader Sacramento Area (BSA) Report** – no report.
- **CA Air Resources Board (CARB) Report** – Mr. Gerber will bring the questions asked by the board to his next CARB meeting.
- **Technical Advisory Committee (TAC) Report** – no report.
- **Smoke Management Program (SMP) Report** – no report.

**9. Set Next BCC Meeting Agenda – August 1, 2025 Hosted by: Shasta County AQMD**

**10. Adjourn Meeting**

Chair Guerra adjourned the meeting at 2:05 pm.

Respectfully submitted by: Laurie LaGrone, BCC Secretary-Treasurer

BCC:ll

# Sacramento Valley Basinwide Air Pollution Control Council

**Title:** Motion needed to accept Financial Status Report as of June 30, 2025.

**Presenter:** BCC Secretary-Treasurer

## ATTACHMENTS:

### Description

Financial Report - Bank Account Register 6-30-2025

Financial Report - Profit & Loss Budget vs Actual 6-30-2025

2025-06-20\_BCC\_Reconciliation\_Detail

### Upload Date

7/28/2025

7/28/2025

7/28/2025

### Type

Supporting Documents

Supporting Documents

Supporting Documents

## Sacramento Valley Basinwide Air Pollution Control Council

07/09/25

## Bank Accounts Register

Accrual Basis

As of June 30, 2025

Type	Date	Num	Name	Split	Debit	Credit	Balance
<b>Tri Counties Bank</b>							28,464.98
Bill Pm...	07/17/2024	1066	Butte County AQMD	Accounts Payable		1,389.45	27,075.53
Bill Pm...	07/17/2024	1067	Western Weather Group	Accounts Payable		4,283.33	22,792.20
Bill Pm...	07/17/2024	1068	Western Weather Group	Accounts Payable		814.67	21,977.53
Deposit	08/15/2024			-SPLIT-	66,266.00		88,243.53
Bill Pm...	08/22/2024	1069	Butte County AQMD	Accounts Payable		1,389.45	86,854.08
Bill Pm...	08/22/2024	1070	Western Weather Group	Accounts Payable		4,283.33	82,570.75
Bill Pm...	08/22/2024	1071	Western Weather Group	Accounts Payable		814.67	81,756.08
Deposit	09/11/2024			-SPLIT-	27,226.00		108,982.08
Bill Pm...	09/18/2024	1072	Butte County AQMD	Accounts Payable		1,389.45	107,592.63
Bill Pm...	09/18/2024	1073	Western Weather Group	Accounts Payable		4,283.33	103,309.30
Bill Pm...	09/18/2024	1074	Western Weather Group	Accounts Payable		814.67	102,494.63
Bill Pm...	10/16/2024	1075	Butte County AQMD	Accounts Payable		1,389.45	101,105.18
Bill Pm...	10/16/2024	1076	Western Weather Group	Accounts Payable		4,283.33	96,821.85
Bill Pm...	10/16/2024	1077	Western Weather Group	Accounts Payable		814.67	96,007.18
Bill Pm...	11/20/2024	1078	CA Special Districts Assn	Accounts Payable		500.00	95,507.18
Bill Pm...	11/20/2024	1079	Butte County AQMD	Accounts Payable		1,389.45	94,117.73
Bill Pm...	11/20/2024	1080	Western Weather Group	Accounts Payable		4,283.33	89,834.40
Bill Pm...	11/20/2024	1081	Western Weather Group	Accounts Payable		814.67	89,019.73
Bill Pm...	12/18/2024	1082	Butte County AQMD	Accounts Payable		1,389.45	87,630.28
Bill Pm...	12/18/2024	1083	Western Weather Group	Accounts Payable		4,283.33	83,346.95
Bill Pm...	12/18/2024	1084	Western Weather Group	Accounts Payable		814.67	82,532.28
Bill Pm...	01/15/2025	1085	Butte County AQMD	Accounts Payable		1,389.45	81,142.83
Bill Pm...	01/15/2025	1086	Western Weather Group	Accounts Payable		4,283.33	76,859.50
Bill Pm...	01/15/2025	1087	Western Weather Group	Accounts Payable		814.67	76,044.83
Bill Pm...	02/19/2025	1088	Butte County AQMD	Accounts Payable		1,389.45	74,655.38
Bill Pm...	02/19/2025	1089	Western Weather Group	Accounts Payable		4,283.33	70,372.05
Bill Pm...	02/19/2025	1090	Western Weather Group	Accounts Payable		814.67	69,557.38
Genera...	03/01/2025	Jrnl 6		Annual District Assessme...	2.00		69,559.38
Bill Pm...	03/25/2025	1091	Butte County AQMD	Accounts Payable		1,389.45	68,169.93
Bill Pm...	03/25/2025	1092	Western Weather Group	Accounts Payable		4,283.33	63,886.60
Bill Pm...	03/25/2025	1093	Western Weather Group	Accounts Payable		814.67	63,071.93
Bill Pm...	04/16/2025	1094	Butte County AQMD	Accounts Payable		1,424.19	61,647.74
Bill Pm...	04/16/2025	1095	Western Weather Group	Accounts Payable		4,283.33	57,364.41
Bill Pm...	04/16/2025	1096	Western Weather Group	Accounts Payable		814.67	56,549.74
Bill Pm...	05/21/2025	1099	Butte County AQMD	Accounts Payable		300.00	56,249.74
Bill Pm...	05/21/2025	1100	Butte County AQMD	Accounts Payable		1,424.19	54,825.55
Bill Pm...	05/21/2025	1101	Western Weather Group	Accounts Payable		4,283.33	50,542.22
Bill Pm...	05/21/2025	1102	Western Weather Group	Accounts Payable		814.67	49,727.55
Total Tri Counties Bank					93,494.00	72,231.43	49,727.55
<b>U. S. Bank</b>							
Total U. S. Bank							
<b>TOTAL</b>					<b>93,494.00</b>	<b>72,231.43</b>	<b>49,727.55</b>

9:25 AM

07/09/25

Cash Basis

## Sacramento Valley Basinwide Air Pollution Control Council

## Profit &amp; Loss Budget vs. Actual

July 2024 through June 2025

	Jul '24 - Jun 25	Budget	% of Budget
Ordinary Income/Expense			
Income			
Annual District Assessments	93,494.00		
Total Income	93,494.00		
Expense			
Professional Services			
Administrative Services	15,653.43		
Ag Burn Services	47,116.63		
Meteorological Services	8,961.37		
Total Professional Services	71,731.43		
Special Department Expense			
Memberships	500.00		
Total Special Department Expense	500.00		
Total Expense	72,231.43		
Net Ordinary Income	21,262.57		
Net Income	21,262.57		



3:05 PM

07/03/25

## Sacramento Valley Basinwide Air Pollution Control Council

## Reconciliation Detail

Tri Counties Bank, Period Ending 06/20/2025

Type	Date	Num	Name	Clr	Amount	Balance
<b>Beginning Balance</b>						56,549.74
<b>Cleared Transactions</b>						
<b>Checks and Payments - 4 items</b>						
Bill Pmt -Check	05/21/2025	1101	Western Weather G...	X	-4,283.33	-4,283.33
Bill Pmt -Check	05/21/2025	1100	Butte County AQMD	X	-1,424.19	-5,707.52
Bill Pmt -Check	05/21/2025	1102	Western Weather G...	X	-814.67	-6,522.19
Bill Pmt -Check	05/21/2025	1099	Butte County AQMD	X	-300.00	-6,822.19
Total Checks and Payments					-6,822.19	-6,822.19
Total Cleared Transactions					-6,822.19	-6,822.19
Cleared Balance					-6,822.19	49,727.55
Register Balance as of 06/20/2025					-6,822.19	49,727.55
<b>Ending Balance</b>					<b>-6,822.19</b>	<b>49,727.55</b>

# Sacramento Valley Basinwide Air Pollution Control Council

**Title:** Approve Auditor

**Presenter:** BCC/TAC Secretary-Treasurer

**Recommended action:** Receive the recommendation for selection of an auditor from the selection committee.

## ATTACHMENTS:

Description

SVBCC Proposal 2023-26

Upload Date

7/28/2025

Type

Supporting Documents

PROPOSAL TO PROVIDE PROFESSIONAL  
AUDIT SERVICES FOR

**Sacramento Valley Basinwide  
Air Pollution Control Council**

FOR THE FISCAL YEARS ENDED JUNE 30, 2023, 2024, 2025 AND 2026

**CONTACTS:**

**Ingrid Sheipline, Managing Partner**

isheipline@richardsoncpas.com

**Brian Nash, Partner**

bnash@richardsoncpas.com



550 Howe Avenue, Suite 210  
Sacramento, California 95825  
Phone: (916) 564-8727  
Fax: (916) 564-8728

July 9, 2025

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## TABLE OF CONTENTS

---

Cover Letter.....	1
Firm Qualifications and Experience	
Richardson & Company, LLP Profile and Commitment to Quality .....	3
Our Experience Serving Governmental Organizations .....	5
Qualifications and Experience of Our Key Personnel .....	9
Our Audit Approach .....	11
References.....	15
Professional Fees.....	16
Exhibit A – Peer Review Report .....	18



550 Howe Avenue, Suite 210  
Sacramento, California 95825

Telephone: (916) 564-8727  
FAX: (916) 564-8728

July 9, 2025

**Sacramento Valley Basinwide  
Air Pollution Control Council**

c/o Laurie LaGrone  
629 Entler Avenue, Suite 15  
Chico, CA 95928

Thank you for your interest in our firm and the opportunity to present our proposal to continue to serve the **Sacramento Valley Basinwide Air Pollution Control Council (BCC)**. We are genuinely enthusiastic about the prospect of serving you because auditing governments with their unique reporting requirements has developed into one of our firm's major areas of expertise. If given the opportunity, you can be sure that we would serve BCC with great care and pride.

**Our Understanding of the Services to be Performed**

We understand that the scope of the engagement includes an annual audit of the BCC's basic financial statements for the fiscal years ending June 30, 2023 to 2026. The audits will be conducted in accordance with generally accepted auditing standards, leading to an expression of an opinion on the financial statements. The financial statements will be prepared in accordance with Governmental Accounting Standards Board (GASB) Statement No. 34 and other applicable GASB Statements. For the fiscal years 2022/23 and 2023/24 audits, we will provide a list of items needed for the audits as soon as a contract is in place. We would expect to have the audit completed by January 31. In subsequent year audits, we will provide BCC with a list of items we will need for the audit in July. We will enter the BCC general ledger trial balance into our audit software, which represents a database program that links to the financial statements. Our audit will entail ensuring that all accrual adjustments have been made, and any adjustments noted during our audit will be made in our audit software so they can be reflected in the financial statements. We will review the management discussion and analysis prepared by management. Draft reports will be provided to management for review. Final reports will be issued no later than January 31, or at such time that BCC approves the drafts.

**Our Extensive Experience with Local Governments**

In any service organization, it is the people who make the difference. All of our staff have extensive experience auditing governmental entities, including joint powers authorities, special districts and cities. Our team members know and understand the challenges and opportunities confronting governmental entities and our team consists of professionals who have proven their ability to provide auditing and other services to special districts. We have extensive experience with performing audits of special districts, as listed in this proposal. We have also provided audit services to most of the cities in the Sacramento area, which follow the same accounting

principles as BCC. Having provided audit services for various governmental entities makes us exceptionally well qualified to provide the services you currently request.

## Why Our Firm is Different and Why Our Selection is the Best Decision BCC Could Make

This proposal summarizes the key reasons why you will benefit from selecting us as your auditors as well as the background and resources of our firm, the experience and qualifications of the people who will work with you, the scope of services to be provided and our fee estimate. We are a solution to the need for high quality services priced at a reasonable cost and are an excellent alternative to other firms because of the expertise we gained as a result of our firm's proven ability to serve our governmental and other clientele, including both large and small organizations. The quality of our services exceeds that of national and other firms because our team uses more experienced professionals to actually perform the work. Our approach is also more thorough than most firms, thus ensuring you will receive a quality audit. Also, since we have performed the audit in past years, and we are well acquainted with the BCC's operations and controls, our selection to continue as your auditors would provide for better audits with less disruption to the BCC's staff. If given the opportunity, we are confident in our ability to continue to meet and exceed your expectations.

\* \* \* \* \*

Our proposal has been signed by an individual who is authorized to bind our firm contractually. Ingrid Shepline and Brian Nash, partner, are authorized to represent our firm during the proposal process. If you have questions or need additional information, please contact Ms. Ingrid Shepline (916) 564-8727, fax (916) 564-8728, correspondence at 550 Howe Avenue, Suite 210, Sacramento, California 95825 or email sent to [ishepline@richardsoncpas.com](mailto:ishepline@richardsoncpas.com).

Very truly yours,

RICHARDSON & COMPANY, LLP



Ingrid M. Shepline, CPA  
Managing Partner

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## FIRM QUALIFICATIONS AND EXPERIENCE

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### Richardson & Company, LLP Profile

Richardson & Company, LLP is a regional CPA firm established in 1991 and located in Sacramento. We have a total staff of thirty-three, including twelve CPAs, all of which are involved in government audits. We are among the 15 largest accounting firm operating in the Sacramento area and have one of the largest audit practices of any locally based audit firm. We provide audit, accounting, tax and business advisory services to numerous governmental, commercial and nonprofit entities, including the largest water district in the world located in Los Angeles and other organizations primarily located in the Sacramento and San Francisco-Oakland bay areas and as far north as Eureka, California and south as Whittier, California.

We provide audit services to governmental entities (cities, water, air quality and fire districts, other special districts, regional transportation planning agencies, Transportation Development Act funding recipients and joint powers authorities), nonprofit organizations, financial institutions and bank holding companies, real estate partnerships, a magazine circulation audit and others. We have provided audit services to most of the cities located within the greater Sacramento region, large water and fire special districts such as Sacramento Suburban Water District, Sacramento Metropolitan Fire District, Sacramento Public Library Authority and several transportation planning agencies including the Sacramento Area, El Dorado, Placer, Amador, Nevada, Lassen, Calaveras, Butte and San Joaquin Councils of Governments and their city and county funding recipients. We also provide audit services to the Sacramento Metropolitan Air Quality Management District and Yolo Solano Air Quality Management District. We perform Single Audit Act and compliance audits for both governmental and nonprofit entities. We provide tax services to our audit clients requiring those services.

### Commitment to Quality

We are a member of the Center for Audit Quality of the American Institute of Certified Public Accountants (AICPA) and participate in the AICPA National Peer Review Program. We are registered with the Public Company Accounting Oversight Board (PCAOB) created by the Sarbanes-Oxley Act to inspect firms that audit SEC registrants. All firms that join the Center for Audit Quality agree to adhere to published quality control standards and submit to peer reviews and inspections of their practice every three years. We have passed all ten of our peer reviews with a “clean opinion” and three PCAOB inspections. The ten peer reviews cover the entire period our firm has been in existence. Our latest peer review report is attached to this proposal. The peer review report for the review as of March 31, 2024 was completed in May 2025 and that report is not yet available for release. All of our peer reviews have included the review of specific government engagements.

The quality control policies for our auditing practice are described in detail in our firm’s Quality Control Document. All employees and members of our firm are provided with a copy of our Quality Control Document and are responsible for understanding, implementing and adhering to these policies and procedures. Our policies and procedures cover each of the following six elements of quality control: 1) Leadership, 2) Relevant Ethical Requirements, 3) Acceptance and Continuance of Clients and Engagements, 4) Human Resources, 5) Engagement Performance and 6) Monitoring. The adequacy of our quality control system and our compliance with that system are independently evaluated every three years through a peer review.

We also demonstrate our commitment to providing quality service in many other ways, including:

- Organizing, staffing, and managing engagements to provide for appropriate levels of technical competence, experience, supervision and review.
- Undertaking quality control reviews of selected engagements to assure compliance with professional standards.
- Recognizing our obligation to the public as well as to our clients.
- Conducting engagements in accordance with clients whose concern for reputation and integrity is similar to our own.
- Promoting the growth of our firm primarily by referrals from existing clients satisfied with the quality of our services.

In addition to excellent peer review and inspection results, other examples of our commitment to quality include:

- Assisting numerous governmental entities with receiving the Certificate of Excellence in Financial Reporting awarded by the Government Finance Officers Association, including several that received the award on the first attempt.
- Performing several special investigative audits for governmental special districts that have received extensive statewide news media attention. Being selected several times to conduct this special audit work demonstrates that our firm has the resources and expertise to successfully complete difficult, unusual auditing projects in a timely manner. Our investigations discovered several problems and our audit results were made public by the districts involved. The FBI, IRS and district attorney's office subpoenaed our workpapers to assist them with their investigations. We have testified in federal court and given depositions related to this work which, in certain cases, resulted in managers and assistants serving federal prison sentences.
- Auditing the California Department of Water Resources on behalf of a large Southern California water agency for the past thirty years, including twelve years while key personnel in our firm were with Ernst & Young. The Agency is a consortium of twenty-six cities and water districts serving nearly nineteen million people in the Los Angeles and San Diego areas. It is the largest water district in the world. This large, complex audit of the multi-billion-dollar State Water Project managed by the California Department of Water Resources is on a scale and nature as to rarely be performed by other than "Big Four" international CPA firms.
- Engaging a nationally recognized accounting consultant who has authored several accounting and reporting manuals, including those dealing with SEC matters, as technical support for our firm in addition to the support customarily available through the American Institute and California Society of CPAs.
- Engaging a partner and Director of Audit and Banking Practices for a large midwestern firm to serve as the concurring reviewer for our SEC registrant bank as well as providing consultation with respect to audit and accounting issues for other clients. He has extensive experience auditing banks and public companies as a result of more than twenty years with Ernst & Young, KPMG and his current firm.



- Preparing audited financial statements and other information for inclusion in several public offering documents reviewed by the SEC and other CPA firms, including Big Four firms, with minimal insignificant changes.
- Preparing audited financial statements reviewed by the State Board of Accountancy without change.

## Our Experience Serving Governmental Organizations

Ingrid Sheipline, Brian Nash and their team have built a practice oriented toward providing services equal in caliber to those provided by firms operating on a national level. Many of our present and past clients are former national-firm clients and include the following governmental organizations:

### Special Districts

- Sacramento Valley Basinwide Air Quality Control Council
- Sacramento Metropolitan Air Quality Management District
- Yolo-Solano Air Quality Management District
- Sacramento Transportation Authority
- Sacramento Area Council of Governments
- Sacramento Public Library Authority
- Sacramento Regional Fire/EMS Communication System
- Sacramento Metropolitan Cable Television Commission
- Butte County Association of Governments
- Capital Southeast Connector Joint Powers Authority
- State Water Project Contractors Authority
- South Yuba Water District
- Yolo Emergency Communications Authority
- Yolo County Transportation District
- Yolo County Flood Control and Water Conservation District
- Yolo Subbasin Groundwater Agency
- Humboldt Waste Management Authority
- Reclamation District 1000
- Reclamation District 2035
- Sites Reservoir Project Authority
- California Educational Facilities Authority
- California Pollution Control Financing Authority
- Dixon Public Library District
- Vacaville Unified School District Library District
- Cortina Community Services District
- South Lake Tahoe Recreation Facilities JPA
- Sacramento Metropolitan Fire District
- American Canyon Fire Protection District
- Nevada County Consolidated Fire District
- El Dorado County Emergency Services Authority
- California Tahoe Emergency Services Authority
- El Dorado Hills Fire Department
- Wilton Fire Protection District
- Pacific-Fruitridge Fire Protection District
- Courtland Fire Protection District
- Herald Fire Protection District

- California Fire Rescue Training Authority
- Dixon Fire Protection District
- Rescue Fire Protection District
- Cosumnes Community Services District
- El Dorado Hills Community Services District
- Mountain House Community Services District (became the City of Mountain House)
- California Exposition and State Fair
- Orleans Community Services District
- Volcano Community Services District
- Rancho Murrieta Community Services District
- Diablo Community Services District
- Ranch House Community Services District
- Glenn-Colusa Irrigation District
- El Dorado Irrigation District
- El Dorado County Transportation Commission
- El Dorado County Transit Authority
- El Dorado County Local Agency Formation Commission
- Yolo County Local Agency Formation Commission
- Florin Resource Conservation District
- Citrus Heights Water District
- Fair Oaks Water District
- Central California Irrigation District
- Glenn-Colusa Irrigation District
- Carmichael Water District
- Del Paso Manor Water District
- Amador Water Agency
- Oakdale Irrigation District
- Merced Irrigation District
- Byron Bethany Irrigation District
- Byron Sanitary District
- Yuba County Water Agency
- Calaveras County Water District
- Calaveras Public Power Agency
- Nevada Irrigation District
- South San Joaquin Irrigation District
- South Feather Water and Power Authority
- Tuolumne Utilities District
- Sacramento Suburban Water District
- San Luis & Delta-Mendota Water Authority
- Delta Conveyance Finance Authority
- San Joaquin Valley Drainage Authority
- Tri-Dam Project and the Tri-Dam Power Authority
- Rio Linda/Elverta Community Water District
- Paratransit, Inc.
- Transport System of the University of California at Davis
- Yuba-Sutter Transit Authority
- Fair Oaks Recreation and Park District
- Auburn Area Recreation and Park District
- American River Flood Control District
- Amador County Transportation Commission

- Amador Transit
- Calaveras Council of Governments
- Calaveras Transit Agency
- County of Calaveras Transit Fund
- Sacramento Area Council of Governments Local Transportation Funds of the Counties of Sacramento, Sutter, Yolo and Yuba and Sacramento State Transit Assistance Fund
- Marin County Transit District
- Lassen County Transportation Commission
- Lassen Transit Services Agency
- Association of California Healthcare Districts - The Alpha Fund (workers compensation risk pool for rural hospitals)
- Regional Waste Management Authority
- Sacramento County Waste Management and Recycling
- Regional Water Authority
- Sacramento Groundwater Authority
- San Juan Water District
- Funds and accounts of the California Department of Water Resources on behalf of the Metropolitan Water District of Southern California, including special analyses and projects related to its contract with the State
- San Joaquin Council of Governments
- Cities of Escalon, Lodi, Manteca, Lathrop, Ripon and Tracy and County of San Joaquin Transportation Development Act Funds
- San Joaquin County Local Transportation Fund and State Transit Assistance Fund
- San Joaquin Regional Transit District
- Cities of Manteca, Lathrop, Tracy, Lodi and Ripon Transit Systems
- Funds and accounts of the U.S. Bureau of Reclamation (USBR) on behalf of the Central Valley Project Water Association and various water districts including Santa Clara Valley Water District, East Bay Municipal Utility District, Contra Costa Water District, Sacramento Municipal Utility District and Placer County Water Agency

#### Cities

- City of American Canyon
- City of Colfax
- Town of Paradise
- City of Marysville
- City of Ione
- City of West Sacramento
- City of Citrus Heights
- City of Sonoma
- City of Chico
- City of Elk Grove
- City of Sutter Creek
- Cities of Folsom, Rancho Cordova, Galt, Isleton, Sacramento, Davis, Live Oak, Yuba City, Marysville, Wheatland, West Sacramento, Winters and Woodland Transportation Development Act Funds
- County of Butte and Cities of Oroville, Chico, Gridley, Biggs, and Paradise Transportation Development Act Funds
- County of Nevada and cities of Nevada City and Grass Valley
- El Dorado County and City of Placerville, County of Placer and Cities of Auburn, Lincoln, Loomis, Roseville and Rocklin Transportation Development Act Funds
- City of Lincoln
- City of Rocklin
- City of Dixon
- City of Folsom
- City of Biggs
- City of Colusa
- City of Rancho Cordova
- City of Isleton
- Town of Loomis
- Town of Fort Jones

- Funds and accounts of the California Department of Water Resources on behalf of a large water agency, including special analyses and projects related to its contract with the State

The services we provide to these and other clients prove that we have the ability to provide the services that BCC requires. Examples of these services include the following:

- We conduct the audits of the basic financial statements of numerous joint powers authorities and special districts, as well as several cities. Our experience performing these audits of basic and special purpose governmental financial statements has made us thoroughly familiar with the application of generally accepted governmental accounting principles.
- We have provided the Cities of Elk Grove, Chico, Citrus Heights, West Sacramento, Folsom, Rancho Cordova and Dixon and the Cosumnes (formerly Elk Grove) Community Services District, Sacramento Metropolitan Fire District, Fair Oaks Water District, Oakdale Irrigation District, Florin Resource Conservation District, San Juan Water District and San Joaquin Council of Governments with extensive assistance in the preparation of their Annual Comprehensive Financial Report (ACFR), including the first ACFR the Florin Resource Conservation District, Oakdale Irrigation District, Marin County Transit District, Cosumnes (formerly Elk Grove) Community Services District, Sacramento Metropolitan Fire District and San Joaquin Council of Governments had ever prepared.
- We have conducted audits of other organizations that derive its revenue from number dues and assessments to accomplish common goals similar to BCC but are structured as non-profit organizations, such as California Association of Council of Government, California Urban Water Agencies, California Municipal Treasurers Association, California Society of Municipal Finance Officers, California Association of Public Procurement Officials, California Water Association, Association of Threat Assessment Professionals, Central Valley Clean Water Association, Child Support Directors Association, Association of California Healthcare Districts, California City Management Foundation and Western Association of Chamber Executives.

## Independence

Our firm is independent of BCC as defined by applicable auditing standards. We ensure that independence is maintained in all of our audits consistent with professional standards. Richardson & Company requires that all professional personnel be familiar with and adhere to the independence rules, regulations, interpretations, and rulings of the AICPA, the State of California Board of Accountancy and the State of California CPA Society. Our policy prohibits certain transactions that would impair the firm's independence with respect to our clients.

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## QUALIFICATIONS AND EXPERIENCE OF OUR KEY PERSONNEL

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We have the personnel with the necessary professional qualifications and technical ability to provide you with the quality service you are looking for. As you can see from the resumes of our key personnel, we have developed the proficiency in the accounting principles and standards and governmental and grant compliance auditing to ensure you will receive quality work. Our firm philosophy centers around our commitment to the highest level of quality service-delivered by quality people. We have a history of providing technical excellence through teamwork responsive to clients' needs and expectations. Our commitment to quality results in satisfying the needs of our clients by providing value-added services and attracting and retaining clients of the highest caliber.

The following resumes outline the qualifications and experience of our key team members.

Ingrid M. Shepline, CPA (Managing Partner and Project Manager)

Ingrid serves as our Managing Partner and would have overall responsibility for planning, directing and coordinating our services for you. Since significant and timely project manager involvement is a cornerstone of our quality control procedures, she will be involved in all phases of our audit work from initial planning through report preparation. Formerly an audit manager with Ernst & Young LLP, she is a Certified Public Accountant with forty years of experience. Ingrid has supervised and conducted the fieldwork for a variety of clients including governmental entities, nonprofit organizations, utilities, banks, insurance agencies, manufacturers and distributors. While with Ernst & Young LLP, she specialized in governmental entities and grant compliance auditing, and has attended or taught numerous governmental education seminars. She is currently serving or has served almost all of the governmental entities mentioned in the previous section, including the BCC.

Ingrid has a Bachelor of Science degree in accounting with honors from California State University, Sacramento. She is a member of the American Institute of Certified Public Accountants and the California Society of Certified Public Accountants, having served on the Board of Directors of the Society's Sacramento Chapter and as a member of the Government and Nonprofit Committee.

Brian Nash, CPA (Partner and Technical Advisor/Concurring Reviewer)

Brian, an audit director with our firm, would serve as a second, additional or concurring reviewer. He has over thirty years of professional accounting and auditing experience and has provided services to a variety of clients, including most of the government entities, nonprofits, banks, water agencies and other entities described in the following section of this proposal, including many of the cities and other special districts. Brian received a Bachelor of Science degree in accounting with honors from California State University, Sacramento. He is a member of the American Institute of Certified Public Accountants and the California Society of Certified Public Accountants.

Heidi McLucas, CPA (Audit Manager)

Heidi McLucas is a manager with our firm and will work closely with Ingrid in planning, conducting fieldwork and workpaper review. She has conducted fieldwork and assisted with supervising the staff in the performance of governmental agency audits for the past twenty years. She would be assigned for the entire duration of the fieldwork. Heidi has twenty years of experience with our firm and a total of thirty years of accounting experience, including five years as the manager in charge of an H&R block office. She has provided services to a variety of

clients, including a number of governmental entities, water agencies, nonprofits, banks and other entities described in the preceding sections of this proposal. She has previously served on the audit of BCC and has served a number of special districts such as Yolo Solano Air Quality Management District, Sacramento Transportation Authority, Sacramento Suburban Water District, Herald Fire Protection District, Carmichael Water District, Nevada Irrigation District, Nevada County Transportation Commission and El Dorado County Transportation Commission, among others. Heidi received a Bachelor of Arts degree from Simpson University.

#### Other Staff

We would assign a senior and staff as needed to the engagement with experience working on special district and governmental audits since everyone in our firm is required to work on a portion of our previously mentioned audits.

#### Staffing Continuity

Richardson & Company, LLP has proven its ability to attract and retain an excellent professional staff to serve our clients and meet our commitments. We currently have twenty-nine professional staff, including twelve CPAs, and four administrative staff. In addition, while national and other firms have high staff turnover rates, which makes it difficult to provide staffing continuity from year to year, our firm has experienced a very low turnover rate. We consider staffing to be of the utmost importance because of its significant impact on our ability to provide you with outstanding service.

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## OUR AUDIT APPROACH

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Our extensive experience in auditing ensures that we will concentrate on those areas of highest risk and plan and coordinate our work with management. We will not waste your time and resources by auditing areas that have no material risk to the financial statements. We will perform an assessment of the internal controls for the purpose of determining the procedures necessary to perform our audit, and any recommended enhancements to internal controls that we note during our audit will be communicated to management and the Board of Directors.

### Scope of Services

We understand that BCC requires an audit of its basic financial statements for the fiscal years ended June 30, 2023 to 2026, in two-year audit cycles, including all procedures necessary for the issuance of an opinion regarding the fairness of the presentation of the financial statements in conformity with generally accepted accounting principles. The audits will be conducted in accordance with U.S. generally accepted auditing standards, the standards set forth for financial audits contained in *Government Auditing Standards (1994)* issued by the Comptroller General of the United States as revised, and the Minimum Audit Requirements and Reporting Guide for California Special Districts as required by the State Controller's Office. These services will include the following:

1. Evaluate internal controls sufficient to determine the nature and extent of procedures to perform.
2. Testing of basic financial statements.
3. Ensure compliance with Governmental Accounting Standards
4. Perform an audit to obtain reasonable assurance that financial statements are free of material misstatement.
5. Prepare the financial statements in accordance with GASB 34 and generally accepted accounting principles for government agencies.
6. Prepare year-end closing journal entries. (Note that to maintain our independence BCC would need to have someone knowledgeable of accounting principles review and take responsibility for these adjustments)
7. Prepare and deliver 12 bound copies of the annual audit reports to the Secretary-Treasurer.
8. Present the audit report at a BCC meeting.

We will also prepare a letter to management that will include our recommendations for improvements to systems, procedures and controls, if any, and a governance letter containing certain required communications. We will prepare the financial statements utilizing the information provided by the BCC.

### Audit Approach

Our audit approach to this engagement is divided into three stages as follows:

Initial Planning: We believe that a smoothly run audit is based upon the early identification and resolution of reporting and auditing issues. Due to the extensive knowledge gained through auditing governmental organizations similar to BCC and our past experience with BCC, we will identify such issues in a timely manner. We will examine significant contracts and agreements to determine the effect on the nature and extent of the auditing procedures. We will obtain an



understanding of your current internal control structure policies and procedures and our documentation flow of information through the accounting system.

Program Development: Our risk assessment and evaluation of internal controls will provide the basis for determining the nature, timing and extent of audit procedures for specific transactions and accounts. Our approach to planning the audit will be in accordance with Statement of Audit Standard (SAS) Nos. 104 through 111, as updated by Nos. 122 to 125. Accordingly, we will obtain an understanding of the control environment, risk assessment, information and communication, and monitoring components. An overall audit program is the end product of our initial planning. The primary purpose of this phase of our audit approach is to assess the likelihood of material error in the accounts and transactions and to determine the most cost effective and cost efficient mix of audit procedures. In developing the audit program, our aim will be to:

- Provide a complete audit program for all important financial statement amounts.
- Eliminate redundant audit procedures.
- Use audit procedures which accomplish more than one purpose.

Our audit approach is based on an analysis and understanding of the external and internal risk currently facing the organization we are auditing. Risk analysis enables us to design the most effective and efficient audit program, which evaluates and includes audit tests in relation to the size and probability of these risks. This approach provides us with a uniform method for developing and documenting the basis for our audit program. We will provide BCC with a list of trial balances, confirmation letters, account analyses and other items we will need during the audit.

Program Execution: During this stage of our audit, we will perform the tests of transactions processed through the accounting system, direct tests of account balances and tests of compliance with laws, regulations and contracts. We will perform all requested tasks as one integrated engagement and will schedule the timing of our field work so that there will be minimal disruption of the day-to-day operations. Our year-end testing will focus on substantive testing of significant general ledger balances, analytical procedures and preparation of the financial statements.

Report Preparation: We will prepare the financial statements to ensure consistency with professional standards and we will review the drafts of all our reports and letters with BCC prior to finalization to ensure the reports meet your requirements. Our reporting to BCC will include the communications required by Statement on Auditing Standards No. 115 and communications regarding auditor responsibility, etc., under Statement on Auditing Standards No. 114. If irregularities or illegal acts are noted, we will make an immediate, written report of all irregularities and illegal acts, or indications of illegal acts, of which we become aware to BCC. Upon completion of the audit, we will provide BCC with copies of the financial statements and our reports.



## Work Plan

Task	Timing
<b>Audit Planning:</b>	
Begin audit planning process	July
Internal control/systems documentation and evaluation	
Develop audit programs	
Prepare audit assistance package and confirmation letters	
Risk assessment	
<b>Substantive Testing:</b>	September
Cash and investments	
Revenue and receivables	
Expenses for goods and services and related liabilities	
Fund balance	
<b>Reporting and Wrap-up:</b>	
Prepare the financial statements and other audit reports	October
Draft reports available	November
Delivery of final reports	no later than December 31

Our audit will be planned so that delivery of all required reports will be accomplished in a timely manner. We believe that the staffing of the audit is sufficient to ensure the timely completion of the audit and to ensure that the work is properly supervised. We would work closely with management to ensure that we provide timely services consistent with your requirements. We will prepare, edit and print the financial statements consistent with professional standards and your needs and will review the drafts of all of our reports with you prior to finalization.

Our firm philosophy centers around our commitment to the highest level of quality service--delivered by quality people. Our tradition of providing technical excellence through teamwork responsive to clients' needs and expectations--and doing so to the very best of our ability--requires that our single focus be on quality. Our commitment to quality results in:

- Satisfying BCC's needs by providing value-added services.
- Attracting and retaining clients of the highest caliber.
- Providing personal satisfaction and opportunity for professional growth for every member of our organization.
- A thorough review and evaluation of your systems of internal accounting and compliance controls.
- A review and evaluation of your significant data processing systems and controls.
- A fresh review of operating practices.

Some of the specific benefits BCC will realize from our audit approach include:

Ongoing Communications with the Board--We will work closely with you to resolve issues and serve as BCC's advisor on a timely basis. We do not take dogmatic, unyielding positions, and will keep the lines of communications open. We understand the concepts of materiality and will work with District personnel on all issues with materiality in mind. Members of our engagement team will be readily available to answer BCC's questions and to respond to BCC's needs.

Relevant and insightful suggestions--Our plan and approach require us to obtain a complete knowledge of BCC's operating environment and accounting systems. This will position us well as an "advisor" to BCC.

Less disruption to BCC--Our experience with BCC and our audit plan will result in the most effective and efficient combination of internal control and account balance testing. This will eliminate duplicate procedures and unnecessary tasks, minimizing the necessary number of auditors and, consequently, result in less disruption to BCC.

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## REFERENCES

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We have emphasized throughout our proposal that Richardson & Company provides quality service to governmental entities. Please feel free to contact any of these clients to confirm our ability to provide the type of services you are seeking.

Date of Service(s): June 30, 1994 through 2010, 2018 through 2024  
Name of Organization: Yolo-Solano Air Quality Management District  
Address: 1947 Galileo Court, Suite 103  
Davis, California 95618  
Phone: (530) 757-3650  
Email: [mibarra@ysaqmd.org](mailto:mibarra@ysaqmd.org)  
Contact Person: Miguel Ibarra  
Description of Service: Audits completed in accordance with generally accepted auditing standards, *Government Auditing Standards*.

\* \* \* \* \*

Date of Service(s): January 31, 2003 through 2006 and December 31, 2014 through 2019  
Name of Organization: Sacramento Suburban Water District  
Address: 3701 Marconi Avenue  
Sacramento, California 95821  
Phone: (916) 972-7171  
Email: [jott@sswd.org](mailto:jott@sswd.org)  
Contact Person: Jeff Ott, Director of Finance  
Description of Service: Audit of the financial statements in accordance with generally accepted auditing standards and *Government Auditing Standards*, a Single Audit under OMB Circular A-133 and review of the ACFR. Also completed extensive special project work on behalf of the Board of Directors.

\* \* \* \* \*

Date of Service(s): June 30, 2013 to June 30, 2024  
Name of Organization: Butte County Council of Governments, (audits of BCAG's financial statements, including the Local Transportation Fund, State Transit Assistance Fund, RSTP Fund, Butte Regional Transit, and the Transit and Non-Transit Transportation Development Act Funds of the County of Butte and Cities of Chico, Oroville, Biggs, Paradise and Gridley)  
Address: 326 Huss Drive, Suite 150  
Chico, California 95928  
Phone: (530) 879-2468  
Email: [jquinn@bcag.org](mailto:jquinn@bcag.org)  
Contact Person: Julie Quinn, Chief Financial Officer  
Description of Service: Audit of the financial statements of BCAG, Butte Regional Transit and the special purpose financial statements of the TDA funds of the counties and municipalities listed above in accordance with generally accepted auditing standards, *Government Auditing Standards* and the Single Audit Act, where applicable. The audits included testing for compliance with the Transportation Development Act.

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## PROFESSIONAL FEES

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Our goal is to provide the highest quality service using the highest professional standards at a reasonable cost. We plan each assignment carefully and set a time budget for each phase of the engagement. All of our staff are well indoctrinated in the need to use their time to the fullest efficiency.

### Fees

Based upon our current understanding of your accounting system and procedures, our total cost for the audit of the financial statements under the two-year cycles covering June 30, 2023 through 2026 will be as follows, including out-of-pocket expenses. The breakdown by staff level is as follows:

	<u>HOURS</u>	<u>RATE</u>	<u>FEES</u>
Partner	8	\$ 220	\$ 1,760
Senior Manager	16	190	3,040
Staff	76	100	7,600
	<u>100</u>		<u>12,400</u>
		Discount	<u>(4,400)</u>
Audit fee for June 30, 2023 and 2024			<u>\$ 8,000</u>
Audit fee for June 30, 2025 and 2026			<u>\$ 8,600</u>

**Should you have any questions about the details of our fees, or should our fees not appear competitive with those of the other firms, we would appreciate an opportunity to discuss them with you before you make your final decision.**

These fees are based upon anticipated cooperation from your personnel, and include out-of-pocket expenses for items including supplies, telephone charges and printing. There will be no additional charges to the BCC related to these items. The fees assume records will be provided electronically or be available locally. Travel costs for attending an out-of-town Board meeting will be charged in addition to these fees. This fee estimate includes time to implement new GASB pronouncements that require a minimal amount of effort. If implementation of a new GASB pronouncement will require a significant amount of time, we will discuss a separate fee estimate for this additional effort.

These estimates do not take into consideration changes in the scope of the audit due to changes in accounting or auditing pronouncements and standards, laws or regulations, the loss of key accounting personnel, material weaknesses in the internal control environment, or significant changes in the scope of the BCC's operations. We will discuss a new fee estimate with the BCC if such an event occurs.

## Additional Tasks

Should the BCC require additional or special accounting and/or audit-related services. Any such additional work agreed to between BCC and the firm shall be performed at the following rates per hour for each fiscal year of the contract:

<u>Classification</u>	<u>Rate Per Hour</u>
Partner	\$ 220
Senior Manager	190
Manager	180
Supervisor	150
Senior	120
Staff	100
Administrative	65

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## EXHIBIT A – PEER REVIEW REPORT

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*Jones, Nale & Mattingly PLLC*

### REPORT ON THE FIRM'S SYSTEM OF QUALITY CONTROL

To the Partners  
Richardson & Company, LLP  
and the Peer Review Committee of the California Society of CPA's

We have reviewed the system of quality control for the accounting and auditing practice of Richardson & Company, LLP (the firm) in effect for the year ended March 31, 2021. Our peer review was conducted in accordance with the Standards for Performing and Reporting on Peer Reviews established by the Peer Review Board of the American Institute of Certified Public Accountants (Standards).

A summary of the nature, objectives, scope, limitations of, and the procedures performed in a System Review as described in the Standards may be found at [www.aicpa.org/prsummary](http://www.aicpa.org/prsummary). The summary also includes an explanation of how engagements identified as not performed or reported in conformity with applicable professional standards, if any, are evaluated by a peer reviewer to determine a peer review rating.

#### **Firm's Responsibility**

The firm is responsible for designing a system of quality control and complying with it to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. The firm is also responsible for evaluating actions to promptly remediate engagements deemed as not performed or reported in conformity with professional standards, when appropriate, and for remediating weaknesses in its system of quality control, if any.

#### **Peer Reviewer's Responsibility**

Our responsibility is to express an opinion on the design of the system of quality control and the firm's compliance therewith based on our review.

#### **Required Selections and Considerations**

Engagements selected for review included engagements performed under Government Auditing Standards, including a compliance audit under the Single Audit Act.

As a part of our peer review, we considered reviews by regulatory entities as communicated by the firm, if applicable, in determining the nature and extent of our procedures.

#### **Opinion**

In our opinion, the system of quality control for the accounting and auditing practice of Richardson & Company, LLP in effect for the year ended March 31, 2021, has been suitably designed and complied with to provide the firm with reasonable assurance of performing and reporting in conformity with applicable professional standards in all material respects. Firms can receive a rating of pass, pass with deficiency(ies) or fail. Richardson & Company, LLP has received a peer review rating of pass.

A handwritten signature in cursive script that reads "Jones, Nale &amp; Mattingly, PLLC".

Louisville, Kentucky  
August 13, 2021

Certified Public Accountants and Advisors

401 West Main Street, Suite 1100 Louisville, Kentucky 40202 tel: 502.583.0248 fax: 502.589.1680 [www.jnmcpa.com](http://www.jnmcpa.com)

# Sacramento Valley Basinwide Air Pollution Control Council

**Title:** Allowable & Conditional Rice Burn Reports

**Presenter:** BCC/TAC Secretary-Treasurer for SMP Coordinator Kai Tawa

**Recommended action:** Approve SMP Coordinator's reports (motion needed).

## ATTACHMENTS:

Description	Upload Date	Type
Allowable Burning 2025	7/28/2025	Supporting Documents
Conditional Burning 2025	7/28/2025	Supporting Documents

**JULY 15, 2025**  
**SACRAMENTO VALLEY AIR BASIN**  
**RICE STRAW BURNING LIMIT FOR 2023 CROP**  
H&S 41865 Connelly-Areias-Chandler Rice Straw Burn Act of 1991

41865. (a) This section shall be known, and may be cited, as the Connelly-Areias-Chandler Rice Straw Burning Reduction Act of 1991.

(h) If the terms and conditions for issuing conditional rice straw burning permits specified in paragraphs (1) to (4), inclusive, are met, a conditional rice straw burning permit may be issued unless the state board and the department have jointly determined, based upon an annual review process, that there are other economically and technically feasible alternative means of eliminating the disease that are not substantially more costly to the applicant. The terms and conditions for issuing the conditional rice straw burning permits are:

- (1) The fields to be burned are specifically described.
- (2) The applicant has not violated any provision of this section within the previous three years.
- (3) During the growing season, the county agricultural commissioner has independently determined the significant presence of a pathogen in an amount sufficient to constitute a rice disease such as stem rot.
- (4) The county agricultural commissioner makes a finding that the existence of the pathogen as identified in paragraph (3) will likely cause a significant, quantifiable reduction in yield in the field to be burned during the current or next growing season. The findings of the county agricultural commissioner shall be based on recommendations adopted by the advisory group established pursuant to subdivision (e).
- (i) (1) The maximum annual number of acres burned in the Sacramento Valley Air Basin pursuant to paragraph (4) of subdivision (c) shall be the lesser of:
  - (A) The total of 25 percent of each individual applicant's planted acres that year.
  - (B) A total of 125,000 acres planted in the Sacramento Valley Air Basin.

(2) Each grower shall be eligible to burn up to 25 percent of the grower's planted acres, as determined by the air pollution control officers in the Sacramento Valley Air Basin and subject to the maximum annual number of acres burned set forth in paragraph (1), if the grower has met the criteria for a conditional rice straw burning permit.

(3) The air pollution control council shall annually determine which is the lesser of subparagraphs (A) and (B) of paragraph (1), and shall determine the maximum percentage applicable to all growers subject to the conditions set forth in subdivisions (f) and (h).

DETERMINATION OF THE MAXIMUM ALLOWABLE ACRES OF RICE STRAW BURNING IN THE SACRAMENTO VALLEY AIR BASIN FOR THE 2025 CROP YEAR			
COUNTY	PLANTED	CALCULATIONS	ACREAGE LIMITS:
Butte	96,000	Total planted rice acres =	By regulation the annual Basin burn limit is 25% of total planted acres or 125,000 acres whichever is less.
Colusa	142,000	525,211	
Glenn	78,916	25% of planted acres =	
Placer	9,915	131,303	The maximum annual Basin burn limit is 125,000 acres.
Sacramento	10,234	COMMENTS  Burning is permitted for diseased rice acreage.  The crop year includes fall, winter and spring burning.	
Shasta	0		
Sutter	118,000		
Tehama	16		
Yolo & Solano	32,000		
Yuba	38,130		
BASIN TOTAL	525,211		



**Sacramento Valley Basinwide Air Pollution Control Council  
2025 Conditional Rice Straw Burning Permit Program**

**Submitted to:**

**Steven Cliff, Executive Officer  
California Air Resources Board**

**and**

**Karen Ross, Secretary  
California Department of Food and Agriculture**

July 15, 2025

## **BACKGROUND**

The Conditional Rice Straw Burning Permit Program is a requirement of Health and Safety Code Section 41865 the Connelly-Areias-Chandler Rice Straw Burning Reduction Act of 1991.

The Permit Program was developed by the California Air Resources Board (CARB) in consultation with the California Department of Food and Agriculture (CDFA) and the Sacramento Valley Basinwide Air Pollution Control Council (BCC).

Section 41865 (e) of the Act required the California Air Resources Board to adopt regulations to govern the Conditional Rice Straw Burning Permit Program (Program). CARB adopted this regulation on September 28, 2000.

The regulations required the BCC to adopt a Program that contains specific elements, including confirmation of disease by the local Agricultural Commissioner, significance thresholds for disease for the first two years of the program, field inspection procedures, annual reporting, and certification of rice disease inspectors. The BCC adopted and submitted the final Program to CARB on April 13, 2001, for review and approval.

The Program took effect on September 1, 2001. The BCC incorporated the Conditional Rice Straw Burning Permit Program into the Smoke Management Program document as an appendix.

The purpose of the Program is to implement the last stage of the Act by providing a uniform, scientifically based mechanism for rice growers in the Sacramento Valley Air Basin to obtain Conditional Rice Straw Burn Permits within the annual acreage limits allowed under the Act. This program is intended to have the flexibility to adapt to changing disease conditions and scientific findings and to provide a reasonable and low-cost procedure for verifying disease in the fields.

## **REPORTING REQUIREMENTS**

As required by the Program, beginning July 1, 2001, and continuously thereafter, the BCC shall collect and compile annual data including, but not limited to:

1. The total rice acreage planted in the Basin for the current year.
2. Total acres requested to be burned.
3. Total acres determined by county agricultural commissioners to meet the terms and conditions for burning.
4. Total acres approved for burning by the Air Pollution Control Officers (APCOs).
5. Total acres burned.
6. Total amount of planted acreage in the previous year.

7. Number of enforcement actions initiated for fraudulent inspections, and resolution of each.
8. Total amount of fees charged by each county agricultural commissioner.

The annual data collected shall be that data which pertains to each burn year from September 1 through August 31 of the following year. Data shall be grouped by county.

Beginning in 2002 and annually thereafter, the BCC shall submit to the CARB and CDFA, by July 15, a report on program implementation. The report shall include, but shall not be limited to, the following information:

1. General assessment of program operation.
2. The annual data statistics that were compiled.

## **DATA COLLECTION AND REQUEST FOR COMMENTS**

The collection of program data commenced in September 2019 and a preliminary report of the data was presented to the Technical Advisory Committee (TAC) of the BCC at their August 2020 meeting. The report included the eight data requirements noted in the section above and data were grouped by county.

Air districts were requested to update the annual data for the 2019 crop year regarding the number of diseased rice acres, acres requested to be burned, acres permitted and burned. The Sacramento Valley air districts, county agricultural departments and the California Rice Commission (CRC) also were asked to provide comments on program operations. Meetings were held with Air Resources Board staff and the TAC to discuss program issues and operations.

## **PROGRAM ASSESSMENT AND COUNTY DATA**

In 2003, the Basinwide Control Council asked the Technical Advisory Committee to form a subcommittee to review the rice disease inspection procedures. This was done pursuant to the following provision contained in the approved Program:

### **INSPECTION METHODS AND PROCEDURES**

#### **Future Procedure**

Effective June 1, 2003 or later, the BCC may approve, modify, or replace the inspection procedures described above as long as they retain provisions to confirm presence of disease in the fields proposed for burning.

At the June 2003 public hearing on the Sacramento Valley Smoke Management Program, of which the Conditional Rice Burning Permit Program is a component, the BCC approved amendments to the inspection procedures.

## **AGRICULTURAL COMMISSIONER RESPONSIBILITIES**

### **A. Statistical Significance of Disease Using Baseline Disease Levels**

During the 2003 rice growing season, each county Agricultural Commissioner shall implement the method established by Appendix B to support an independent finding for the 2003 burn season that all fields in their county satisfy the requirements for placement on a Conditional Rice Straw Burn Permit. The statistical significance of Baseline Disease Levels set forth in Appendix B of this Program shall be used in making such independent findings.

If the Agricultural Commissioner in a particular county cannot successfully make such a finding for their county, then an Application for Determination of Terms and Conditions shall be required for each field to be placed on a Conditional Rice Straw Burn Permit according to the requirements of Section VIII.E below.

### **B. Statistical Significance of Disease Using Prevailing Disease Levels**

During each of the 2003 and 2004 rice growing seasons, each county Agricultural Commissioner shall perform random sampling in their county, according to the requirements set forth in subsections 1-3 of this section, to support an independent finding for the following year's burn season that all fields in their county satisfy the requirements for placement on a Conditional Rice Straw Burn Permit. The statistical significance of Prevailing Disease Levels set forth in Appendix B of this Program shall be used in making such independent findings.

If the Agricultural Commissioner in a particular county cannot successfully make such a finding for their county, then an Application for Determination of Terms and Conditions shall be required for each field to be placed on a Conditional Rice Straw Burn Permit according to the requirements of Section VIII.E below.

#### **1. Selection of Inspection Sites:**

Each agricultural commissioner shall select inspection sites at random with a large spatial distribution of sites among the rice growing area of their county. This may allow for some detection of regional differences in prevailing disease levels.

#### **2. Minimum Number of Required Inspection Sites:**

The Agricultural Commissioner(s) in each county or geographic area (defined in Appendix B) shall annually inspect the number of rice fields corresponding to the planted acreage in their district or geographic area as defined by the following:

Acres Planted	Fields (minimum)	Samples (minimum)
< 50,000	6	18
50,000 - 100,000	10	30
> 100,000	15	45

Each field shall be not less than 50 acres in size.

3. Methods of plant/soil collection, counting, and scoring of rice plants, and collection, storage, and analysis of soil samples:

The Agricultural Commissioner in each district shall use the biased/unbiased Combination Inspection Procedure specified in Section IX.B to quantify qualifying disease levels in each rice field inspected but shall use only unbiased samples for making prevailing disease level inspections. All other plant collection, counting and scoring, and storage methods shall be completed as specified in Section IX. Each Agricultural Commissioner shall complete an Agricultural Commissioners Prevailing Disease Level Inspection Form (Appendix I) for each rice field inspected.

#### C. Agricultural Commissioners Annual Disease Process

Commencing in the 2005 growing season, and continuing through the 2010 growing season, each Sacramento Valley Agricultural Commissioner shall make an independent finding, on an annual basis as to whether or not all rice fields in their jurisdiction contain pathogens in sufficient quantities to constitute a rice disease. The finding shall be based on a statistical analysis of the prevailing disease levels data as specified in the Program. Each Sacramento Valley Agricultural Commissioner shall, by September 1 of each year, report in writing their disease finding to the BCC for the following burn season.

Commencing in 2011, each Agricultural Commissioner may reference the information contained in the periodic evaluation reports required in Section VIII.D in making the independent disease finding as required by Section 41865 of the California Health and Safety Code.

In any county or district where the Agricultural Commissioner is unable to make a countywide finding of significant disease presence an Application for Terms and Conditions approved by the Agricultural Commissioner shall be required for each field to be placed on a

Conditional Rice Straw Burn Permit according to Section VIII.E of this Program.

D. Periodic Evaluations of Prevailing Disease Levels

Commencing in the 2010 growing season and continuing every five years thereafter the Sacramento Valley Agricultural Commissioners shall use a protocol for periodic evaluations of the existing levels of disease occurring in the region. The protocol shall be designed to evaluate any substantial change in the prevailing disease levels that may have occurred since the previous periodic evaluation. The protocol shall include field inspections, literature review, and discussions with growers, regional technical experts, the University of California, the California Department of Food and Agriculture, and the California Rice Commission.

By December 31, 2010, and every five years thereafter, the Sacramento Valley Agricultural Commissioners shall submit a written report of their evaluations to the BCC. The conclusions contained in these periodic reports shall be used as the basis for annual countywide disease certifications for each of the following five (5) year's burn seasons until the next periodic evaluation is required. If the data collected does not support countywide disease certifications in any of the subject counties for each of the following five years, the Sacramento Valley Agricultural Commissioners may, at their discretion, resume in-field inspections as described in section VIII. B or require an Application for Determination of Terms and Conditions for each field to be placed on a Conditional Rice Straw Burn Permit according to the requirements of Section VIII.F below.

On April 3, 2020, the Sacramento Valley Air Basin Control Council approved a disease evaluation protocol. The protocol involved a meeting or conference call for the purpose of enabling the Sacramento Valley Agricultural Commissioners to consult with University of California, Davis, Extension Rice Farm Advisors about their general observations of the prevalence of qualifying rice diseases in the Sacramento Valley. The UC Rice Farm Advisors were chosen for this role because they were deemed by the Basinwide Council to be the most familiar with both rice fields and the disease pathology. Therefore, the Basinwide Council considered them to be the best source of general qualitative disease assessment information over the past five years. A representative from the California Department of Food and Agriculture was also invited to participate in this consultation.

After the consultation, all Sacramento Valley Agricultural Commissioners were satisfied that adequate disease levels persisted. Then the UC Rice Farm Advisors and Commissioners drafted and submitted a letter to the

BCC explaining their findings. The letter included a summary of the general observations and professional judgment of the UC Rice Farm Advisors on the matter and served as the basis of the Sacramento Valley Agricultural Commissioners' required action to qualify the counties for no more than 25 percent annual burning over the next five years. This served as the final action of the Sacramento Valley Agricultural Commissioners to address the 2020 requirement. If not, all Commissioners were satisfied that adequate disease levels persisted, then implementation of an inspection program to conduct a certain number of actual field inspections, based upon the amount of acres in each county, would have been undertaken.

A comprehensive report of 2019 rice disease inspections, conducted by the University of California Extension (UC Extension) staff, was transmitted to each of the Sacramento Valley Agricultural Commissioners. These UC Extension experts were chosen for this role because they were deemed by the Basinwide Council to be highly knowledgeable about both rice fields and rice disease pathology. Therefore, the Basinwide Council considers them to be the most qualified professionals to perform a qualitative disease assessment in time for the 2020 burn season.

Based upon the findings of the inspection report, each of the Sacramento Valley Agricultural Commissioners was satisfied that adequate disease levels persist, and then the finding letter was sent to the Council as the final action of the Sacramento Valley Agricultural Commissioners to address the 2020 requirement.

In 2024, another survey was conducted by UC Extension staff and found that disease levels were once again high enough to meet the prevalence requirement.

The Determination of Terms and Conditions is not required if the requirements of the Section above, Parts A, B, or C have been met. The option remains however for individual field certifications if a countywide disease certification cannot be made for a particular county.

The Appendix B statistical probability equation is:  $P_b = (x_1/n_1)$  with  $x_1$  = number of fields sampled in 2001 & 2002 and  $n_1$  = number of fields with at least one non-biased sample with an average score below 15 percent. If the probability of burning ( $P_b$ ) is less than 5 percent a countywide disease finding may be made.

## **DATA TABLE AND PROGRAM ASSESSMENT**

Smoke Management Program (SMP) operations were consistent with the policies and procedures included in the approved plan. More rice acres were identified as having levels of disease that met the qualifying threshold for burning than actually were burned under the Program.

The Sacramento Valley Air Basin data on planted rice acreage and the individual county data on diseased, requested, permitted, and burned acres for crop year 2024 are presented in the following table.

## Conditional Rice Straw Burning Permit Program Data

Sacramento Valley Air Basin						
Rice Acres Planted in Two Previous Years					2023	2024
Sacramento Valley rice data for crop year 2024					555,739	551,927
County	DISEASED ACRES <sup>1</sup>	REQUESTED ACRES	PERMITTED ACRES	BURNED ACRES <sup>2</sup>	INSPECTION ACTIONS	AGRICULTURAL DEPT FEES
Butte	235,500	3,827	3,827	3,827	0	\$0.00
Colusa	32,197	11,234	11,234	11,234	0	\$0.00
Glenn	20,072	9,155	9,155	9,155	0	\$0.00
Placer	2,380	156	156	156	0	\$0.00
Sacramento	2,473	0	0	0	0	\$0.00
Shasta <sup>3</sup>	0	0	0	0	0	\$0.00
Solano <sup>3</sup>	0	0	0	0	0	\$0.00
Sutter	29,500	5,430	5,430	5,430	0	\$0.00
Tehama	22	0	0	0	0	\$0.00
Yolo	8500	706	706	706	0	\$0.00
Yuba	9,339	687	687	687	0	\$0.00
Totals	127,982	31,195	31,195	31,195	0	\$0.00

### NOTES:

<sup>1</sup> - Total acres determined by agricultural commissioners, with UC rice extension specialists, to meet the terms and conditions for burning through countywide certification or individual field inspections (25% of planted rice acres).

<sup>2</sup> – Burned acres are totals from September 16, 2024 through June 30, 2025.

<sup>3</sup> - Shasta and Solano counties do not have any rice acreage.



# Sacramento Valley Basinwide Air Pollution Control Council

**Title:** Fee Structure Review

**Presenter:** Joe Tona

**Recommended action:** Receive explanation of explanation of how the BCC calculates annual member district contributions.

## ATTACHMENTS:

Description	Upload Date	Type
BCC Fees	7/28/2025	Supporting Documents
BCC Fee Calc	7/28/2025	Supporting Documents
Final - May-2023 SMP	7/28/2025	Supporting Documents

## **Requested Action(s)**

### **a) INFORMATIONAL PRESENTATION - Regarding the Sacramento Valley Basin Wide Control Council Fee Structure**

#### **Background:**

##### **SVBCC Fee Structure Overview**

At the June Basin Control Council (BCC) meeting, the Technical Advisory Committee (TAC) was tasked with providing an informational presentation explaining how fees are assessed to Sacramento Valley Air Districts.

In Fiscal Year 2021–2022, the Sacramento Valley Basin Control Council (SVBCC) adopted a new fee structure designed to:

- **Ensure a balanced budget**
- **Maintain a reserve equal to 15% of projected expenses**

#### **Fee Structure Components**

##### **Base Amount**

Each District is assessed a flat base fee of \$1,000.

##### **Permit Amount**

A fee not to exceed five dollars (\$5) per permit (HSC §41866). The fee is charged to each burn permit and permitted stationary source reported by each District.

##### **Pro-Rata (Basin) Amount**

Referred to as the “basin fee” when introduced in the FY21–22 budget. Calculated as follows:

1. Begin with the BCC’s projected expenses
2. Subtract the total base and permit amounts from all participating Districts
3. Subtract the flat pro-rata fees charged to the two designated Districts
4. Allocate the remaining amount among the other seven Districts based on the District Acreage Distribution (as defined in Table 2 of the Sacramento Valley Smoke Management Plan, reflecting acreage during the non-fall intensive burn season)

##### **Reserve True-Up (if needed)**

If the projected fund balance falls short of the 15% reserve target, the shortfall is calculated and divided evenly among all nine Districts.

District Contributions							
County	Base Fee	Number of Permits	Permit Fee	% Basin	Basin Fee	Annual Reserve Fee	Final District Contribution
Butte	\$ 1,000.00	1264	\$ 6,320	17%	\$ 4,600	\$ 484	\$ 12,404
Colusa	\$ 1,000.00	268	\$ 1,340	17%	\$ 4,600	\$ 484	\$ 7,424
Feather River	\$ 1,000.00	1575	\$ 7,875	24%	\$ 6,495	\$ 484	\$ 15,853
Glenn	\$ 1,000.00	1280	\$ 6,400	13%	\$ 3,518	\$ 484	\$ 11,402
Placer	\$ 1,000.00	689	\$ 3,445	5%	\$ 1,353	\$ 484	\$ 6,282
Sacramento-Metro	\$ 1,000.00	2347	\$ 11,735	9%	\$ 2,435	\$ 484	\$ 15,654
Shasta	\$ 1,000.00	871	\$ 4,355	FLAT	\$ 500	\$ 484	\$ 6,339
Tehama	\$ 1,000.00	618	\$ 3,090	FLAT	\$ 500	\$ 484	\$ 5,074
Yol-Solano	\$ 1,000.00	1349	\$ 6,745	15%	\$ 4,059	\$ 484	\$ 12,288
Total	<b>\$ 9,000.00</b>		<b>\$ 51,305</b>		<b>\$ 28,061</b>	<b>\$ 4,352.90</b>	<b>\$ 92,719</b>

Annual Input Fields	
PROJECTED EXPENSES	<b>\$ 88,366.00</b>
BASE FEES	\$ 9,000.00
PERMIT FEES	\$ 51,305.00
FLAT FEES	\$ 1,000.00

TOTAL BASIN FEE REQUIRED	<b>\$ 27,061.00</b>
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PROJECTED FUND BALANCE	\$ 8,902
15% RESERVE REQUIREMENT	\$ 4,353
ANNUAL RESERVE FEE	<b>\$ 4,353</b>



# SACRAMENTO VALLEY AIR BASIN SMOKE MANAGEMENT PLAN

Prepared by the Sacramento Valley Basin Wide  
Control Council Technical Advisory Committee

Adoption Date: 06/02/2023  
California Air Resources Board Approved: \_\_\_\_\_

## Table of Contents

I.	AUTHORITY AND APPLICABILITY .....	4
II.	PROGRAM GOALS.....	4
III.	PROGRAM PARTICIPANTS .....	4
IV.	PROGRAM EQUATIONS .....	4
A.	California Air Resources Board Allocation Equation .....	4
1.	Standard Allocation Equation .....	4
2.	Spring increase to standard allocation equation .....	5
3.	Determining burn day status above 3,000 feet .....	5
B.	Spring, Summer, and Winter Acreage Distribution System .....	6
V.	INTENSIVE FALL BURN SEASON ACREAGE DISTRIBUTION EQUATION .....	7
A.	Fall Burn Season Acreage Distribution Equation.....	7
B.	Air Quality Reduction Factors .....	8
C.	Ventilation Rating Factor .....	9
VI.	DEFINITIONS OF BASINWIDE METEOROLOGICAL AND AIR QUALITY FACTORS .....	9
VII.	FACTORS AFFECTING ACREAGE ALLOCATIONS .....	10
A.	Rainfall Effects.....	10
B.	North Wind Days .....	11
C.	Special Circumstances - Adverse Air Quality Conditions .....	11
D.	Special Circumstances - Superior Ventilation Conditions .....	11
VIII.	FACTORS AFFECTING DISTRIBUTION OF ACRES .....	12
A.	Sacramento Federal Ozone Non-Attainment Area No Burn Days .....	12
B.	Procedure.....	12
IX.	Basinwide acreage ALLOCATION TYPES AND UPDATES .....	12
A.	Initial Basinwide Allocation .....	12
B.	CARB Revised Basinwide Allocation .....	12
C.	Maximum Theoretical Allocation .....	13
D.	Updated CARB Acreage Allocation.....	13
E.	Updated Acreage Distribution .....	13
X.	TYPES OF DAYS .....	13
A.	No Burn Days.....	13
B.	Prunings Only Days.....	14

C.	Restricted Field Days .....	14
D.	Regular Burn Days .....	14
XI.	BURN HOURS.....	15
A.	FIELD CROPS .....	15
B.	PRUNINGS .....	15
XII.	COMMUNICATION PROCEDURES ON EARLY PRE-STORM DAYS.....	15
XIII.	PROCEDURES FOR MANAGING AGRICULTURAL BURNING.....	16
A.	Fall 9:30 AM meeting .....	16
B.	Web-Based Burn Map .....	16
C.	Daily Acreage Allocation and Distribution Considerations .....	16
D.	Operating Dates of the Fall Program and Management Responsibilities.....	16
E.	Spatial Management of Burning .....	17
F.	Data Management for the Intensive Fall Burn Season .....	17
G.	Personnel on Duty and Holiday and Weekend Staffing .....	17
H.	Conservative Burn Management .....	17
1.	Field conditions .....	17
2.	Meteorological conditions .....	18
3.	Air quality considerations .....	18
4.	Spatial and temporal considerations .....	19
I.	District Communications with Growers .....	19
J.	Adjustments for Burned Acreage.....	19
K.	Acreage Updates .....	19
XIV.	GENERAL BURNING REQUIREMENTS FOR GROWERS.....	19
A.	Drying Times.....	19
B.	Ready to Burn List .....	20
C.	Burning Authorization and Acreage Allocation.....	20
D.	Ignition Patterns.....	20
E.	Harvest Date.....	20
F.	Return Unused Burn Acreage.....	20
G.	Chopped Rice Fields .....	21
XV.	COMPUTER FILE DATA AND COMMUNICATION TIMETABLE (Fall burning only).....	21
A.	Computer Files .....	21
B.	Daily Files and Access Timetable.....	21

XVI. COMPLAINT HANDLING AND ENFORCEMENT ..... 22

XVII. PRESCRIBED BURNING ..... 23

    C. Policies and Procedures ..... 24

Appendix A ..... I

Appendix B ..... II

Appendix C ..... III

## I. AUTHORITY AND APPLICABILITY

The Sacramento Valley Air Basin (SVAB) Smoke Management Program (Program) was prepared by the Technical Advisory Committee (TAC) and the Basin Control Council (BCC) of the SVAB pursuant to §41863 of the California Health and Safety Code (HSC) and §80140(a) of Subchapter 2, Smoke Management Guidelines for Agricultural and Prescribed Burning of Title 17 of the California Code of Regulations (CCR). The current Program officially took effect on October 30, 2001. Air district staff coordinated with the California Air Resources Board (CARB), fire protection agencies, land managers with jurisdiction in the SVAB, the public and other affected parties in its development. In accordance with the CCR, Title 17, § 80140(c), the Smoke Management Program (Program) of the SVAB is designated as a regional smoke management program. CARB has the sole authority to approve the Program (Sections 80140(e-i)); pursuant to Sections 80140 (k and l), any amendments to the Program must be submitted to CARB for approval within 30 days after adoption by the BCC. CARB can request modifications as necessary.

The Program applies to all agricultural burning conducted at all elevations in the SVAB, as defined by the California Health and Safety Code § 39001 adopted and signed into law in 2004. This supersedes the previous definition in §80101(a) of Title 17 of the CCR adopted by the CARB board in 2000. A current map of the SVAB, including subordinate burn zones in each air district is provided as Appendix A. The Basin boundaries as defined in CARB's Smoke Management Guidelines regulation are current. Policies and procedures in this plan apply throughout the year unless otherwise specified. Some requirements apply only during the fall burning season.

## II. PROGRAM GOALS

The purpose of this program is to fulfill Subchapter 2 of Title 17 which is intended to provide for the continuation of agricultural burning, including prescribed burning, as a resource management tool, and provide increased opportunities for prescribed burning and agricultural burning, while minimizing smoke impacts on the public.

In addition, the Program goals include the following: protection of air quality in the SVAB; protection of public health and safety; and effective management of daily agricultural burning operations.

## III. PROGRAM PARTICIPANTS

Program participants include:

- The SVAB TAC.
- The SVAB air districts (districts), agricultural departments and fire agencies.
- The CARB Agricultural and Prescribed Burning Support Section and other responsible sections.
- The Smoke Management Program Coordinator (SMPC), under contract with the BCC.
- The meteorological services consultant, under contract with the BCC.

## IV. PROGRAM EQUATIONS

### A. California Air Resources Board Allocation Equation

#### 1. Standard Allocation Equation

The standard acreage allocation equation is used throughout the year. The equation calculates a "theoretical maximum acreage allocation" for the day (called the Allocation Equation on CARB's Daily



Basinwide Ag-Burn Acreage Allocation sheet). CARB meteorologists or the SMPC use the equation to adjust the theoretical maximum acreage allocation into the ARB Revised Basinwide Allocation or the Revised Allocation. The “theoretical maximum acreage allocation” equation may be altered in the future by the TAC and CARB.

#### *Allocation Equation*

$$= -166.667 \times (-170 + AM_{stab} + (0.2049159 \times 500_{mb12}) - (0.3579679 \times WS) + \overline{PM_{2.5}})1$$

Where:

$AM_{stab}$	= AM stability - morning temperature difference in Fahrenheit between 3,000 feet above mean sea level (msl) and the surface
$500_{mb12}$	= 500 millibar heights in decimeters at 4:00 a.m. from National Weather Service models
$WS$	= average wind speed in miles per hour (mph) forecasted by CARB through the mixing layer
$\overline{PM_{2.5}}$	= Particulate Matter (PM2.5) basinwide average from 12:00 a.m. to 6:00 a.m.

## 2. Spring increase to standard allocation equation

During the months of March through May, the acreage allocations may be increased by CARB due to improved atmospheric dispersion by a factor of 1.5. This includes Daylight Saving Time when there are longer burn hours beginning in March. This will be noted by CARB Meteorological staff in the daily allocation notes section.

## 3. Determining burn day status above 3,000 feet

There is no acreage limiting allocation for burning above 3000 feet msl. The burn day status for above 3,000 feet msl is determined by the 500 millibar (mb) pressure elevations as outlined in the table of 500mb heights for Decision Criteria below. The 500 mb charts show large scale regional features (altitude at which 500 mb pressure occurs) that can be used to identify subsidence and stagnation which causes poor dispersion. The SVAB uses one decameter higher than the decision point for burning above 3,000 feet msl. In place of the standard 3,000 feet msl, the elevation may be specified in increments of 500 feet each day as determined from vertical temperature soundings.

As per §80100 of Title 17, CARB may declare a marginal burn day if meteorological conditions approach the criteria found in table 1 of §80320 of Title 17 for permissive burn days and smoke impacts are not expected. CARB and the SVAB developed the procedures below to demonstrate parameters for a marginal burn day or a permissive burn day. However, notwithstanding the criteria listed in table 1 below, CARB may announce permissive burn, marginal burn, or no burn days based on expected meteorological conditions and on anticipated impacts to air quality from agricultural burning and prescribed burning. Decisions made outside of the criteria in the table below will be noted by CARB meteorological staff in the daily allocation notes section. Examples of conditions that may be considered by CARB include, but are not limited to, low level mixing heights, PM conditions, and local observations.

**TABLE 1-PARAMETERS FOR A MARGINAL BURN DAY OR A BURN DAY (500MB HEIGHTS IN DECAMETERS)**

Month	No Burn	Permissive (Marginal)	Permissive (Fair)	Permissive (Good)	Permissive (Superior)
January	≥574	≥571 <574	≥567 <571	≥558 <567	<558
February	≥574	≥571 <574	≥567 <571	≥558 <567	<558
March	≥574	≥571 <574	≥567 <571	≥558 <567	<558
April	≥576	≥572 <576	≥568 <572	≥564 <568	<564
May	≥579	≥577 <579	≥572 <577	≥567 <572	<567
June	≥585	≥582 <585	≥579 <582	≥573 <579	<573
July	≥588	≥585 <588	≥583 <587	≥579 <582	<579
August	≥588	≥587 <588	≥583 <587	≥579 <583	<579
September	≥587	≥585 <587	≥579 <585	≥573 <579	<573
October	≥585	≥582 <585	≥576 <582	≥570 <576	<570
November	≥581	≥577 <581	≥571 <577	≥565 <571	<565
December	≥576	≥573 <576	≥567 <573	≥558 <567	<558

## B. Spring, Summer, and Winter Acreage Distribution System

Below 3000 feet msl, CARB will distribute the allocated acreage directly to the counties based upon the distribution system detailed in Table 2 below, except during the fall intensive burn period, which is discussed below in Section V. The data in the following table represent each county's total acreage distribution for burning acreage during the winter, spring, and summer seasons. The primary crop residues burned during these seasons are rice, wheat, corn, safflower, and orchard prunings, as well as prescribed burning.

CARB may further adjust the distribution based upon current burning, meteorological, and air quality factors. Reasons for adjusting the percentages should be noted on the allocation page.

**TABLE 2 - SPRING, SUMMER, AND WINTER ACREAGE DISTRIBUTION**

SPRING, SUMMER, AND WINTER ACREAGE DISTRIBUTION SYSTEM	
COUNTY	ACREAGE DISTRIBUTION
Butte	17 %
Colusa	17 %
Glenn	13 %
Placer	5 %
Sacramento	9 %
Shasta	200 acres
Sutter	17 %
Tehama	200 acres
Yolo/Solano	15 %
Yuba	7 %

## V. INTENSIVE FALL BURN SEASON ACREAGE DISTRIBUTION EQUATION

### A. Fall Burn Season Acreage Distribution Equation

During the intensive fall burn season (September 15th– November 30th), the SMPC distributes acreage to the counties using the distribution equation described below. The distribution equation does not apply to Shasta and Tehama counties, as those counties will receive 200 acres per day unless they request additional acres from the SMPC. As discussed below in Section B, districts reporting elevated morning PM2.5 values will have reduced acreage allocations or no acres if a no burn day is declared for that county.

The distribution equation is: *County Acreage Allocation* =  $CP \times BA$

The equation variables are:

Basin Allocation (BA): BA from initial CARB basinwide allocation

County Proportion (CP):  $CW \div \text{sum of all } CW$

County Weighting Factor (CW):  $AQ \times VR \times \left( \frac{CF}{BF} + \frac{CR}{BR} + \frac{BS}{CS} \right)$

Air Quality Factor (AQ): 0-1

Ventilation Rating Factor (VR): 1-5

County Fall Total Planted Acres (CF): Total burned to date

Basin Fall Total Planted Acres (BF): Sum of all CF

County Ready Acres\*(CR): As reported by each county

Basin Ready Acres (BR): Sum of all CR

*\* “County Ready Acres” are defined as follows: A maximum of 25 percent of a district’s planted rice acres that are reported as ready to burn. In order to be eligible to burn, rice fields must have been harvested, passed the drying time and the field(s) must be listed on the respective district’s conditional rice burn permit. Other crop residues may also be included on the list when they are ready to be burned.*

## B. Air Quality Reduction Factors

Local air quality restrictions for county acreage reductions are determined from the average midnight to 6:00 AM PM<sub>2.5</sub> observations for one or more stations in or near each county or district. The air quality reduction factors (0-1) are used in the CARB allocation page or on CARB’s section of the daily 9AM program file.

Table 3 lists the PM<sub>2.5</sub> air monitoring station(s) associated with each county or district for the purpose of calculating the air quality reduction factor.

**TABLE 3 - PM<sub>2.5</sub> MONITORING STATIONS FOR AIR QUALITY REDUCTION FACTORS**

Corresponding PM <sub>2.5</sub> Monitoring Station(s) for Air Quality Reduction Factors	
COUNTY	MONITORING STATIONS
Butte	Average of Chico and Gridley
Colusa	Colusa
Glenn	Willows
Placer	Lincoln
Sacramento	Higher of T Street or Del Paso Manor
Shasta	Redding
Sutter	Yuba City*
Tehama	Red Bluff
Yolo-Solano	Average of Davis and Woodland
Yuba	Yuba City*

\*The monitoring station in Yuba City is used for both Sutter and Yuba County’s air quality reduction factors

When any district’s midnight to 6:00 AM average PM<sub>2.5</sub> concentration is equal to or greater than 27 micrograms per cubic meter (µg/m<sup>3</sup>), there is a decrease in the acres allocated to that county in increments of 20% (or a factor of 0.2) for concentrations measured in increments of 2 µg/m<sup>3</sup> as listed in Table 4 below.

**TABLE 4 - PM<sub>2.5</sub> REDUCTION FACTOR**

PM <sub>2.5</sub> Concentration (µg/m <sup>3</sup> )	Reduction Factor
<27.0	0
27.0 – 28.9	0.2

29.0 – 30.9	0.4
31.0 – 32.9	0.6
33.0 – 34.9	0.8
>35.0	1

When any district's 12:00 AM to 6:00 AM average PM<sub>2.5</sub> concentration is equal to or greater than 35 µg/m<sup>3</sup>, a no burn day will be declared in that district.

### C. Ventilation Rating Factor

Counties within the SVAB are broken into zones to identify local ventilation and dispersion characteristics based on current weather data and forecast conditions. The ventilation rating factor for each county or air district is the average of the ventilation factor for each burning management zone in every district (e.g., Glenn County has five zones and thus five ventilation zone factors). The factors are a composite number based upon available meteorological data and have been assigned values from one to five. The corresponding qualitative judgments by the SMPC are:

1. Considerable impact in the region regardless of the placement of burns.
2. Considerable impact in the region if caution is not used in the placement of burns.
3. Some impact in the region but the impact may be tolerable.
4. Minor localized impact within the region.
5. Minimal or no impact in the region.

The ventilation rating is based on factors such as surface and upper-level wind strength and direction, atmospheric stability, field moisture, major roadways, urban areas and approaching frontal weather systems. Prior to assigning the rating for specific regions, all relevant weather information that may have an impact on the movement and dispersion of smoke from burning is reviewed along with satellite and radar imagery, surface and upper air conditions and short-range computer model data to gain a complete understanding of the current and impending weather conditions within the SVAB during the burn period (generally 10:00 AM to 4:00 PM).

## VI. DEFINITIONS OF BASINWIDE METEOROLOGICAL AND AIR QUALITY FACTORS

The basinwide meteorological factor (BMF) is determined using Tables 4 and 5 of §80320 of the CCR. These tables reflect average basinwide morning (AM) stability and wind speed, respectively. The average AM stability value reflects the strength of morning inversions calculated using morning Airline Pilot Observations (APOBs) in the northern (Red Bluff or Chico) and southern (Sacramento) portions of the SVAB, along with surface temperature observations. The northern and southern values of each parameter are averaged together to determine the basinwide AM stability or the temperature difference from 3,000 feet msl to ground surface. If data from APOBs, or if conditions on the Sutter Buttes (approximately 2,000 feet), indicate that temperatures may be significantly warmer at a level below 3,000 feet, CARB may consult with the SMPC to determine a different value. The basinwide average wind speed is an average of the northern (Red Bluff or Chico) and the southern (Sacramento) surface wind measurements in addition to profiler data, pressure gradient nomograms, and computer model forecasts. Additionally, CARB meteorologists consult with the meteorological services consultant meteorologists prior to calculating the BMF and declaring a burn day decision.

**TABLE 5 - AGRICULTURAL BURN METEOROLOGICAL FACTORS (M.F.) TITLE 17 §80320**

Table 4		Table 5	
A.M. STABILITY		WIND SPEED	
°F	M.F.	0 to 2	M.F.
> 17	0.0	3	0.0
15 or 16	0.1	4	0.1
13 or 14	0.2	5	0.2
11 or 12	0.3	6	0.3
9 or 10	0.4	7	0.4
7 or 8	0.5	8	0.5
5 or 6	0.6	9	0.6
3 or 4	0.7	10	0.7
1 or 2	0.8	11	0.8
0 or (- 1)	0.9	> 12	0.9
< (- 2)	1.0	≥ 12	1.0

Automatic Meteorological Observing Stations (AMOS) and towered controlled airports are used to determine AM stability. To assure accuracy of the determination, the coolest of the locations located in rice growing areas in the northern and southern portions of the SVAB are typically selected from the hours of 12Z to 15Z. The CARB duty meteorologist could choose not to use the coolest site if it is unusually cold and not representative of the region's broader conditions. The temperature at 3,000 feet msl from the morning APOBs may also be modified if a dry adiabat followed from the warmest temperature of the sounding below 3,000 feet msl intersected at the 3,000 feet msl level at a temperature warmer than the temperature reported from the flight.

The basinwide air quality factor equals the average of the one-hour readings of PM2.5 from midnight to 6:00 AM CARB generates the BAQF from data collected from the basinwide network of beta attenuating monitor (BAM) samplers as noted in Section 5(B).

## VII. FACTORS AFFECTING ACREAGE ALLOCATIONS

### A. Rainfall Effects

The CARB basinwide allocation will be reduced to 2,000 acres after a daily rainfall amount that exceeds an average of 0.05 inches in the lower elevations of the SVAB (as noted on the 12Z station reports or other available information). The policy is to reduce the CARB acreage allocation whenever wet conditions exist in the SVAB and then increase acreage allocations on subsequent days as the fields dry out. The wet day calculation is found in Table 6 below.

**TABLE 6 – ALLOCATION DURING WET CONDITIONS**

Rainfall today	Highest Rainfall Previous 3 days	Day is
0.00 - 0.00 inches	1.51 inches or greater	Wet
0.01 - 0.05 inches	0.81 inches or greater	Wet
0.06 - 0.11 inches	0.51 inches or greater	Wet
0.12 - 0.17 inches	0.25 inches or greater	Wet
0.18 inches or greater	none required	Wet

Crackle tests (as described in Section 14A) may be performed on rice straw following an average of 0.15 inches (or more) of rainfall to determine if the straw is sufficiently dry to carry fire efficiently through the field.

### **B. North Wind Days**

CARB may reduce basinwide allocations on north wind days to a maximum of 2,000 acres to avoid air quality impacts on urban areas in the southern portion of the SVAB. On north wind days when the basinwide average wind speed exceeds ten miles per hour (mph), the BMF is set to zero (0). In the allocation file, CARB should provide notification language to justify the curtailment or reduction in acreage allocation.

### **C. Special Circumstances - Adverse Air Quality Conditions**

The calculated basinwide allocation may be reduced, or a no burn day may be declared by CARB, when burning may cause or contribute to poor air quality. Justification for reduction in allocation may be from verified citizen complaints, restricted airport visibilities due to smoke, wildfires or high PM2.5 levels. Any visibility reductions must be evaluated for the effects of relative humidity, fog and low clouds. CARB should include reasonable justification for the decrease in allocation on their daily allocation page.

### **D. Special Circumstances - Superior Ventilation Conditions**

After consultation and concurrence with the SMPC, CARB may increase the basinwide allocation amount and recommend an extension of the burning hours if the meteorological conditions are favorable and current air quality readings indicate favorable air quality. The updated allocation shall be available to all districts who request additional acres. The acreage is to be distributed by CARB or by the SMPC during the fall intensive burn season. The CARB duty meteorologist has the authority to issue more than the minimum number of acres and extend burn hours prior to the distribution of the regular CARB acreage allocation time. CARB meteorologists must be available during the burn hours to provide updates. During the fall intensive burn program, CARB meteorologists must re-evaluate the allocation numbers and contact the SMPC or districts to discuss the re- evaluation prior to their lunch hour, as appropriate.

For this purpose, an exceptionally favorable meteorological condition may be defined as vigorous southerly air circulation and an originally calculated BMF greater than 0.50. In this event, the meteorological factor may be set to a higher number (i.e., 0.6 to 1.0) based on an updated forecast and/or hourly PM2.5 levels or favorable field observation reports which may be used to calculate a new allocation. On many days, air quality improves during the middle of the day as heat increases the volume of the mixing layer into which emissions are dispersed. Later in the day, as cooling occurs, the volume of air in the mixing layer decreases and concentrations of particulate emissions increases.

## VIII. FACTORS AFFECTING DISTRIBUTION OF ACRES

### A. Sacramento Federal Ozone Non-Attainment Area No Burn Days

The Sacramento Federal Ozone Non-Attainment Area (SFONA) consists of all of Sacramento and Yolo counties and portions of Solano, El Dorado, Sutter and Placer counties. The SFONA districts rely on ozone forecasting to predict exceedances of the federal ozone standard [100 on the Air Quality Index (AQI)].

On days where an ozone exceedance is predicted for the SFONA, agricultural burning shall not be allowed in the following zones (Table 7) unless there is a reason to allow a burn on a no burn day:

**TABLE 7 - SACRAMENTO FEDERAL OZONE NON-ATTAINMENT AREA ZONES**

SACRAMENTO FEDERAL OZONE NON-ATTAINMENT AREA ZONES	
AIR DISTRICT	NO-BURN ZONES
Sacramento Metropolitan AQMD	Zones 1, 2 and 3
Yolo-Solano AQMD	Zones 2, 4, 5 and 6
Feather River AQMD (Sutter County only)	Zone 6 Sutter County (caution recommended in zones 4 and 5)
Placer County APCD	Zones 1, 2 and 3

### B. Procedure

The Sacramento Metropolitan Air Quality Management District (SMAQMD) shall provide a daily ozone forecast for the SFONA region. When the next day's ozone forecast is expected to exceed the federal ozone standard, the following day shall be declared a no burn day in the burn management zones in the above table. CARB will include the ozone forecast in the morning burn decision as a no burn day for the affected SFONA zones. During the fall intensive burn season, the SFONA no burn decision(s) will be included in the daily records.

CARB may modify the forecast burn decision for the affected burn zones if real-time ozone data indicates meteorological conditions have either improved or worsened since the ozone forecast was made.

## IX. BASINWIDE ACREAGE ALLOCATION TYPES AND UPDATES

The basinwide acreage allocation applies to all agricultural burning and prescribed burning that may occur at or below 3,000 feet msl. The elevation may be modified in increments of 500 feet on a day-to-day basis as determined from vertical temperature soundings when such modification is needed.

### A. Initial Basinwide Allocation

During the intensive fall burning season, CARB and the SMPC will consult on daily meteorological air quality conditions prior to the CARB burn day decision to determine the appropriate initial basinwide acreage allocation for the day. For the remainder of year, CARB determines the initial basinwide acreage allocation and distributes the allocation.

### B. CARB Revised Basinwide Allocation

During the fall intensive burn period, 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 CARB and SMPC to exceed the interim allocations.

### C. Maximum Theoretical Allocation

The initial acreage allocation is calculated by the equation found in section IV and can only be exceeded if an updated allocation is provided by CARB.

### D. Updated CARB Acreage Allocation

CARB and the SMPC may jointly decide to update the allocation after receiving air quality and meteorological data and real-time district field observations after morning burns begin. Allocation updates shall be available only when air quality and meteorological data indicate it is warranted.

### E. Updated Acreage Distribution

The SMPC may update the distribution of acres to individual districts if conditions warrant it, up to the maximum allocation limit. Districts may be asked to provide additional information such as the location(s) of proposed burning and field observations of earlier burns or burns underway to justify the decision to be allocated additional acreage.

A permissive burn or no burn day decision that has been announced may be changed by CARB at any time prior to 10:00 AM if real-time meteorological and air quality conditions warrant it. Situations that may warrant this decision may include: an unexpected change in atmospheric stability, evolving air quality observations, erratic wind conditions and/or fluctuations in precipitation timing. If such a situation arises, the SMPC will consult with CARB. CARB and SMPC will re-publish the burn day decision and 9:00 AM forecast program files with a detailed explanation justifying the change. The SMPC will redistribute the program files prior to 10:00 AM in addition to providing direct notification by means of email distribution to all SVAB air districts. Any legal burns initiated before 10:00 AM are not in violation if a permissive burn day decision is reversed to a no burn day decision. Additional burn allocations are prohibited following the burn day decision reversal.

## X. TYPES OF DAYS

In accordance with State regulation, CARB provides the districts with the burn day status and based on the allocation and the criteria for burning, defines what type of a burn day it is and the amount of acreage allowed. The districts use their judgment in determining the type and/or amount of burning allowed on any given day, provided that the decision is within the initial allocation. This includes CARB reducing the allocation to be less than 200 acres per county. CARB will identify those days when an overriding judgment decision is made as well as the justification for the decision. This could aid the program participants in tracking and evaluating the effectiveness of the burn day criteria.

CARB's decision of a no burn day above 3,000 feet msl will be taken into consideration in determining burning allowed below 3,000 feet msl.

### A. No Burn Days

A "no burn day" is a day with an acreage allocation of zero resulting from the equation or from the following no burn day criteria. A no burn day will be declared when:

1. AM stability is equal to or greater than 17 degrees Fahrenheit and the 12:00 AM to 6:00 AM average basinwide PM<sub>2.5</sub> is equal to or greater than 30 µg/m<sup>3</sup>, or;
2. Average basinwide north wind speed is forecast to be equal to or greater than 20 miles per hour (applies from September 1st through December 31st), or;

3. AM stability is equal to or greater than 17 degrees Fahrenheit and the 12:00 AM to 6:00 AM average PM2.5 is equal to or greater than 32 µg/m<sup>3</sup> at three or more unique monitoring sites.
4. In addition, for the period from December 1st through January 31st, a no burn day will be declared for the portion of the SVAB south of Tehama County if the average of the three unique monitoring sites with the highest 12:00 AM to 6:00 AM average PM2.5 concentration in the portion of the SVAB south of Tehama County is:
  - a. Greater than or equal to 35 µg/m<sup>3</sup>, and
  - b. The forecasted maximum afternoon mixing depths are 1,500 feet above ground level or less, and
  - c. The forecasted CARB wind speed factor for the Sacramento Valley is either less than 5 mph with any wind direction or greater than 10 mph with predominantly north winds.

During the intensive fall burn season, the SMPC will notify districts of a possible CARB decision to declare a no burn day in the 8 AM file comments with the final no burn decision from CARB in the 9 AM file.

No burning will be declared in certain burning management zones when there is a forecast of the federal ozone standard. Districts also have the authority to declare a no burn day within their jurisdiction.

## B. Prunings Only Days

A “prunings only” day will be declared when:

1. AM stability is equal to or greater than 17 degrees Fahrenheit and the 12:00 AM to 6:00 AM average basinwide PM2.5 is 28 µg/m<sup>3</sup> to 29 µg/m<sup>3</sup>, or;
2. Average basinwide north wind speed is forecast to be equal to or greater than 20 miles per hour (applies from January 1st through August 31st).

During the intensive fall burn season, the SMPC will announce any prunings only burn day decision in the 9 AM file. The burning of tree stumps is not permitted on a prunings only burn day.

## C. Restricted Field Days

A restricted field day will be declared when:

1. AM stability is equal to or greater than 17 degrees Fahrenheit and the 12:00 AM to 6:00 AM average basinwide PM2.5 is 25 µg/m<sup>3</sup> to 27 µg/m<sup>3</sup> and the wind speed is forecast to be less than or equal to 5 mph, or;
2. Average basinwide north wind speed is forecast to be equal to or greater than 15 mph.

CARB may declare a restricted field day if the AM stability is greater than or equal to 25 degrees Fahrenheit.

Districts may allocate acreage for the burning of small amounts of ditches, field stubble or spot burning if such burning will not adversely affect downwind air quality. Only 50 total acres of field crop residue burning is allowed per county per day.

## D. Regular Burn Days

Regular burn days are declared when the theoretical acreage allocation is equal to or greater than 2,000 acres and CARB has not designated a prunings only or restricted field day. Allocation per district or county will be a minimum of 200 acres. An air quality reduction factor may result in no burning in a district due to high PM2.5 values. Certain zones of a district may be restricted because of high ozone levels.

On days when the burning conditions are superior, efforts to provide the highest reasonable acreage allocation to districts shall be made to allow for maximum burning on days when there is the lowest potential of smoke impacts to populated areas.

## XI. BURN HOURS

### A. FIELD CROPS

Districts may not authorize field burning on any day before obtaining a burn decision and acreage allocation distribution for that day pursuant to this Program. During the fall intensive burn season, the SMPC will provide the 8 AM file. The 8 AM file is used to communicate all decisions, including early burning, with acreage allocation distributions during the intensive fall burn season.

The burn hours for agricultural burning of field crops are as follows:

1. March 1st to August 31st - 10:00 AM to 5:00 PM.
2. September 1st to the end of February - 10:00 AM to 3:00PM.

During the intensive fall burn season, all field crop burns must be out (no flames) by 4:00 PM, to minimize high afternoon PM2.5, unless there is a late update or burn hours are extended. Districts will consider the adverse smoke dispersion effects due to the change from daylight savings time back to standard time.

The SMPC, after concurrence by CARB, may extend the burn hours, before and/or after the burn hours listed above, basinwide, with favorable south winds or impending rainfall. Extending afternoon burn hours presupposes improving dispersion or maintaining good dispersion.

### B. PRUNINGS

The burning of prunings may be authorized according to the established burn hours after confirming it is a burn day.

Year round burn hours for orchard and other agricultural prunings are from 8:30 AM to 5:00 PM. Districts may, after consideration of air quality impacts, allow additional orchard or other agricultural prunings to be added to an existing hot base fire after the ignition hours.

The 8 AM file is used to communicate all decisions regarding early burning with acreage allocation distributions during the intensive fall burn season. Files will be uploaded on the website and may be retrieved as early as 7:30 AM depending on conditions.

The SMPC, after concurrence by CARB, may extend burning hours before and/or after the standard burn hours basinwide with favorable south winds or impending rainfall. If CARB provides an update after 2:00 PM, CARB will extend the burn hours to a specific time determined by them. Extending afternoon burn hours presupposes improving dispersion or maintaining good dispersion.

## XII. COMMUNICATION PROCEDURES ON EARLY PRE-STORM DAYS

During the intensive fall burn season, the SMPC will initiate collaboration with CARB regarding pre-storm forecasts and messaging to districts. Discussion regarding the potential for pre-storm or extended burn hours may begin up to five days in advance in the “burn day outlook” section provided by the meteorological services consultant on the 9 AM program files. An early pre-storm notification will be provided in the SMPC comments section of the 9 AM and 11 AM files on the day prior to expected pre-storm conditions. This notification only implies that there is the potential for pre-storm conditions and is subject to change pursuant to the following day’s weather conditions or forecast conditions.

Outside of the intensive fall burn season, the districts obtain the acreage allocation directly from CARB. CARB will note an early burn on the acreage allocation webpage if warranted.

## XIII. PROCEDURES FOR MANAGING AGRICULTURAL BURNING

### A. Fall 9:30 AM meeting

During the fall season, at 9:30 AM, a meeting will be held virtually with a call-in option, facilitated by the meteorological services consultant. The meteorological conditions for the day and any pertinent concerns and questions may be discussed in this forum in addition to inter-district coordination regarding burn placement and potential impacts to neighboring districts.

### B. Web-Based Burn Map

A map of the SVAB can be used by districts to plot their burn allocations. The map can show the location of fields, the acreage, and the timing of ignition. The SMPC and districts are then able to view allocated acreage throughout the SVAB, which can help with spatial management of field crop burning.

### C. Daily Acreage Allocation and Distribution Considerations

The allocation and distribution methods will use the following information:

1. Atmospheric stability, inversion heights, and depth of the mixing layer.
2. Wind speeds and directions (upper level and surface).
3. Relative humidity, fuel moisture and cloud cover.
4. Baseline air quality fine particulate matter (PM<sub>2.5</sub>) data and airport visibilities.
5. Quantity and location of agricultural residue to be burned.
6. Consideration of downwind populated areas.
7. The presence of prescribed burning and nearby wildfires.

Emphasis is placed on the expected mixing depths during burn hours when making burn management decisions. During the intensive fall burn season, the meteorological services consultant along with CARB will comment on the atmospheric mixing in their files. Additionally, information will be discussed each morning between the CARB duty meteorologist and the SMPC to determine the initial acreage allocation. The SMPC may, if conditions warrant, reduce the acres allocated by CARB to the SVAB. Justification for such decisions shall be provided in the daily acreage distribution documentation (9 AM file). Outside of the fall season, CARB provides the daily allocation and meteorological resources, if needed. Districts shall coordinate burns with neighboring counties to try to minimize smoke impacts as needed.

### D. Operating Dates of the Fall Program and Management Responsibilities

During the intensive fall burn season, the SMPC is responsible for allocating acreage to the districts using the distribution equation described in Section V. If significant rainfall shortens the intensive fall burn season, the SMPC will stop operations before November 30th with approval from the TAC. The season may also be extended into the first week of December if dry and/or favorable conditions persist, and districts have need to continue. Districts may continue to allow the burning of dry fields following the end of the intensive fall burn season without the SMPC's involvement in the process.

The allocation of acreage to the growers is managed by the district. If fire agencies issue burn authorizations, they shall report in a timely manner and daily to the district all allocations made to growers in order to ensure that inspectors are aware of permissive burns as they occur.

## E. Spatial Management of Burning

As shown in Appendix A, there are 41 burning management zones in the SVAB which provide geographic divisions to manage burning spatially and temporally. When meteorology and/or air quality is more favorable in one or more zones, additional acreage can be placed in those areas with caution not to over-concentrate burn allocation acreage. The updating and distribution of acreage by the SMPC can consider weather and air quality differences between the northern and southern portions of the SVAB. Smoke from prescribed burn projects in the region should be considered when distributing burn allocations to minimize air quality impacts. Project size, elevation and location are factors to consider in smoke management.

## F. Data Management for the Intensive Fall Burn Season

During the fall intensive program, districts shall keep track of ready acres, burned acreage and complaints regarding smoke from agricultural burning and submit this information to the SMPC daily. Districts are required to submit this data prior to 08:15 AM daily. Districts or counties may include any field crop burning acreage that is ready to burn to their total ready acres that is reported to the SMPC.

## G. Personnel on Duty and Holiday and Weekend Staffing

To prevent potential smoke impacts to urban areas and airports within their respective district or an adjacent county, field crop burning is only allowed when authorized by the respective district staff who are trained to allocate field crop burning. District staff shall collect information including observation of smoke dispersion and monitoring potential downwind impacts and/or review up-to-the hour airport and air quality readings prior to requesting additional acres for field burning in their district. This includes holidays and weekends.

Districts may allow prunings-only burning without verbal authorization (with burn acreage reported by permit holders either on a recorded message or electronically to the district) after confirming the burn day status and acreage allocation. During the intensive fall burn season, all districts must confirm the burn day decision prior to allowing agricultural burning. Districts may contact CARB prior to 3:00PM on the day before a holiday or weekend to request CARB's extended outlook.

## H. Conservative Burn Management

Districts shall use air quality and meteorological data to assist in making decisions regarding burn placement in their district's burning management zones. A conservative burn management strategy recommends that air district personnel err on the side of caution whenever conditions are marginal or if there is any amount of uncertainty regarding a potential public impact from smoke. The SVAB Agricultural Burning Map located on the PFIRS website can be used for plotting allocated burn acres and for coordinating burn decisions with other districts.

Districts shall employ extra caution when allowing burning when smoke may impact urban areas, airports, and major roadways.

Successful burn program management relies upon consideration of the following information and procedures when allocating acres for burning:

### 1. Field conditions

There is no substitute for field observations in understanding burn conditions. The following factors should be considered:

1. Fuel moisture: Higher fuel moisture creates more smoke and reduces plume rise, increasing the possibility of impacts on downwind receptors. As necessary, the use of the crackle test (as

described in Section XIV.A) as well as early test burns of small acreage can assist in making burn allocation decisions.

2. Fuel density and arrangement: The increased density of vegetative waste increases the amount of smoke created when burned. A rice field which has been chopped, leaves straw on the ground, preventing airflow and trapping moisture. The potential for weeds, such as tules, on adjacent levees to burn should be considered when a field is burned since the emissions from the additional vegetation must be taken into account. Tules when burned can produce black smoke.
3. Burning techniques: The method used by the grower to ignite the field and the speed in which the field is burned can affect smoke production and plume rise.

## 2. Meteorological conditions

Winds and convection currents can vary greatly throughout the region and can shift throughout the day. Districts shall evaluate data as it becomes available throughout the day to ensure the success of the program.

Surface wind speed, low inversion heights, cold ambient surface temperatures, a rapidly declining mixed layer, and high relative humidity can increase the potential for fumigation and should be evaluated throughout the burn day.

Wind direction and speed, both surface and aloft (transport), are critical. The latest wind data should be used to verify wind direction before making placement decisions. The potential for smoke transport downwind significantly increases when wind speeds exceed 8 mph and an inversion is present.

Authorize only small burns in remote areas if dispersion conditions are poor. When conditions are expected to restrict smoke dispersion, very limited field crop burning should take place only in locations which would not impact populated areas. Caution should be used on days when the daily criteria are close to requiring restricted field day status.

Airport data are collected at the beginning of each hour from Federal Aviation Administration tower-controlled airports. AMOS data collected by the contract meteorological service provider is collected every 15 minutes and displayed on the SMPC website dashboard. This weather station network offers a higher concentration of data in areas where rice burning typically takes place and updates more frequently than FAA tower-controlled airports.

## 3. Air quality considerations

Districts must consider the short-term and long-term impacts from burn allocations by carefully analyzing air quality trends and forecasts along with meteorological information.

1. ARB provides current air quality conditions as measured at BAM monitoring sites which can be monitored throughout the burn day to make informed decisions. Also, with hundreds of low-cost sensors now available, this information can be viewed on a variety of websites, including the US EPA AirNow "Fire and Smoke Map".
2. Airport visibility observations should be checked hourly in the district and surrounding areas.
3. Smoke complaints received by the district should be investigated.
4. Care must be taken to ensure that burning will not contribute to a build-up of pollutants over time that may contribute to elevated PM2.5 and/or exceedances of air quality standards.
5. Areas with elevated concentrations should be considered a poor location when allocating burn acres; in
6. considering if a district will allow any burning that may cause a worsening of current or forecast conditions.

7. Areas/burn zones with elevated concentrations may be specified by CARB or the SMPC as “no burn”.

#### 4. Spatial and temporal considerations

Districts shall distribute their allocated acreage spatially and temporally within each district’s burning management zones to minimize emission densities and protect downwind urban areas.

1. Field lighting times must be specified to the grower so that burning times are staggered.
2. Flexibility should be employed in shifting acreage among zones and to the north and south.
3. If the field is adjacent to and/or upwind of populated areas, the burning of a small field versus a large field is a more protective approach.

To avoid overwhelming an area with co-mingled smoke, districts may enter their scheduled allocations on the agricultural burning map that is available for daily use. Districts should notify adjacent district(s) whenever a considerable number of acres are allocated in a zone contiguous to another district or air basin or if there is reason to believe that smoke may cause impacts to another district or air basin.

#### I. District Communications with Growers

Effective burning management requires better and timelier communication with the growers so that the logistics of conducting the burning can be accomplished. Districts should use voicemail, answering machines and reference burn lists to advise growers near the top of the burn list to be ready to burn to make the system more efficient.

#### J. Adjustments for Burned Acreage

When a field is baled, grazed, flooded, or straw is substantially reduced due to other factors and there is a request to burn the remaining straw, the district will review the conditions in the field and may decide the percentage reduction in acres up to a maximum of 95% of the total acreage.

#### K. Acreage Updates

Acreage updates requested from either CARB or SMPC will be accompanied by the following information provided by the requesting district:

1. District name.
2. Total acres already allocated to growers and number of acres burned prior to requesting additional acres.
3. The size and location(s) of the field(s) pertinent to the request for additional acres.
4. Spatial distribution of the burns by burning management zones.
5. Description of field conditions (e.g., fuel moisture/wind speed/wind direction).
6. Complaints received by the district if any.

## XIV. GENERAL BURNING REQUIREMENTS FOR GROWERS

### A. Drying Times

It is imperative that agricultural waste be sufficiently dry to ensure proper burning by observing the required drying times. For rice straw the following applies:

1. No spread rice straw shall be burned prior to a three-day drying period.
2. No rowed rice straw shall be burned prior to a ten-day drying period unless the rice straw passes the “crackle test”.



3. For rice straw, after 0.15 inches or more of rainfall, a representative sample of the straw must pass the crackle test to be legally burned (§80150(c3)). The increase in fuel moisture due to rainfall and high humidity in the SVAB below 3000 feet msl' results in poor combustion.
4. Stripper header method harvesting requires three days of drying:
  - a. After the first frost found on the field and if the straw passes the crackle test; or
  - b. Three days after mowing and spreading or chopping straw; or
  - c. If the district verifies that the straw is sufficiently dry and passes the crackle test the field will be considered ready to burn.

The crackle test is performed as follows: When checking the field for moisture, a composite sample of straw from under the mat, in the center of the mat, and from different areas of the field shall be taken to ensure a representative sample. A handful of straw from each area will give a good indication. Rice straw is dry enough to burn if a handful of straw selected, as described, crackles when it is bent sharply (§ 80150(c2)).

## B. Ready to Burn List

All persons wanting to burn field crop residue must notify their local district office to get on the ready to burn list (list). When a field is completely harvested it can be placed on the list. All pertinent burn information requested by the district must be provided. Most (not all) burning is allocated based on the list in the order it was reported.

## C. Burning Authorization and Acreage Allocation

No person may conduct agricultural field crop burning unless their district, or the responsible designee, has authorized the burning and allocated the acres for a specific field. The switching of fields without prior approval from the district's APCO is prohibited. If burn acres are allocated and the burning is not completed, the grower must contact their district at the earliest possible time to return the unused acres. The field will remain in the same position on the list.

## D. Ignition Patterns

Rice, barley, oat and wheat straw are to be ignited only by strip firing into the wind or by backfiring, except under a special permit of the district when and where extreme fire hazards are declared by a public fire protection agency to exist, where crops are determined by the district not to lend themselves to these techniques (80150(a(1))). The approved burning techniques (e.g., backfiring, strip firing, and X-firing at low wind speeds) improves consumption of the vegetation and minimizes emissions of pollutants (i.e. smoke). Districts may authorize other lighting methods for safety reasons or if the field crop does not lend itself to the approved techniques or if there are time constraints affecting the burn.

## E. Harvest Date

No field crop acreage that was harvested prior to September 10th shall be burned during the period from October 1st through November 15th, unless approved for burning by the district APCO with jurisdiction over the burn.

## F. Return Unused Burn Acreage

Growers who are authorized to burn and do not burn their allocated acres must return unused acres to the district in a timely fashion. If a grower does not return unused acres (when no burning was attempted) to the district for re-allocation to other growers, the field that was not burned may be dropped to the bottom of the list.



## G. Chopped Rice Fields

Growers must report to the district any rice field(s) that they want to burn that have been chopped. Districts should take this information into consideration for possible higher fuel moisture content of the straw and poor combustion characteristics due to reduced air/fuel mixing.

# XV. COMPUTER FILE DATA AND COMMUNICATION TIMETABLE (FALL BURNING ONLY)

## A. Computer Files

The burn management program relies on the timely review and analysis of pertinent air quality, meteorological, and burn information. These data are critical in burn management decisions. Air districts submit burn acreage data on the Smoke Management Program daily reporting form provided by meteorological services provider. The SMPC collects that data and compiles it into the daily program files, in addition to archiving them and meteorological data and other pertinent information. The information generated during the fall burn season includes:

1. District ready acres and previous day's burned acreage and complaints.
2. The meteorological services consultant zone ventilation ratings for the distribution equation.
3. The meteorological services consultant daily weather discussion and AMOS and airport data.
4. The SMPC's daily comments preceding the basin acreage distribution table.
5. The basin acreage distribution to districts and the "Season to Date" summary.
6. The ready file checklist and comments.
7. CARB basinwide acreage allocation, meteorological factors, air quality data, and comments.
8. CARB BAM data for previous day and from midnight to 6:00 AM (current day);
9. Verified complaints reported to the SPMC by districts and complaints reported directly to CARB.
10. The AMOS and airport data for the latest hour or last identified hour.
11. The zone file with the previous day's specific zones crops burned and season summary.

## B. Daily Files and Access Timetable

Districts must send their ready file information to the SMPC before 8:15 AM each day.

Filename	Access Time	Contents
8AM	8:00AM	SMPC's preliminary comments and reminders specific to the conditions for that day
		SMPC's ready file checklist and comments
		Preliminary CARB Burn Day Status
		CARB BAM data for yesterday along with the midnight to 6:00 AM average
9AM	9:00 AM	SMPC basin acreage distribution table
		SMPC file retrieval checklist and comments specific to the conditions for that day
		Meteorological services consultant final weather discussion
		Current airport and AMOS data
		CARB equation factors and basinwide acreage allocation and complaints

		SMPC zones and crop burning data
		Next day burn day outlook to advise on potential upcoming pre-storm days
11AM	10:30 AM	SMPC information, if necessary, for allocation update or pre-storm advisory
		Meteorological services consultant latest weather information

## XVI. COMPLAINT HANDLING AND ENFORCEMENT

Districts shall record all agricultural burn complaints with the following information at minimum:

1. Location of smoke (both impact location and origin).
2. Duration of smoke impact.
3. Description of impact to the public.
4. Weather/Air Quality data:
  - a. Nearest Air Monitor data, (Use regulatory monitors over lowcost sensors, when available,)
  - b. Wind speed
  - c. Wind direction
  - d. Conditions (clear, cloudy, rain cold, warm etc.)
5. Burn day status:
  - a. Above 3,000 feet msl
  - b. Below 3,000 feet msl
  - c. Basin acreage allocation
  - d. District acreage allocation
6. Type of burning from which smoke originated (e.g., rice, orchard, levee, wildland, prescribed, wildfire, etc.).
7. If unrelated to agricultural burn program, identify origin (structural, illegal, residential, unknown).

Consistent and proportional enforcement actions must be applied to all types of violations. Financial settlements that are a result of a district notice of violation (or notice of noncompliance) are often an effective deterrent to further violations and can mitigate competitive business advantages gained through illegal burning. Enforcement should follow each district's enforcement policy and be consistent with federal, state, and local law.

It is each participating district's responsibility to ensure that their district's regulations cover the enforcement portions of Title 17 of the CCR Subchapter 2 Smoke Management Guidelines for Agricultural and Prescribed Burning sections 80145 (k)-(o). It is noted that specific codes related to the burning of rice straw in the SVAB are also found in the California Health and Safety Code §41865, Connelly-Areas-Chandler Rice Straw Burning Reduction Act of 1991. Current District rules can be found at <https://ww2.arb.ca.gov/current-air-district-rules>.

Examples of violations relevant to the Program may include:

1. Burning field acres on a no burn day.
2. Burning rice acreage committed for the phase down reduction.
3. Burning without authorization.
4. Burning more acres than the allocated acreage.
5. Burning outside the established burn hours.
6. Not meeting the drying criteria or crackle test.

7. Using unauthorized lighting techniques.
8. Burning acres enrolled in an Emission Reduction Credit (ERC) program.
9. Not showing due diligence in safely extinguishing accidental ignitions.

Only complaints from smoke impacts due to agricultural burning are to be considered valid. If a district is unable to investigate and verify a complaint the complaint will be considered valid and the complaint will be forwarded to the SMPC. During the intensive fall burn season, districts will report valid complaints to the SMPC in the daily reporting form.

Smoke complaints received by CARB or an uninvolved district should be forwarded to the district(s) involved for investigation prior to forwarding the complaint to the SMPC. The district verifying the complaint(s) is responsible for forwarding the valid complaints to the SMPC in the daily reporting form.

Districts shall investigate each complaint within a reasonable time and report the results of the investigation to the complainant. Districts shall maintain complaint documents for a minimum of three years. These are considered public information through a public information request.

## XVII. PRESCRIBED BURNING

The Smoke Management Guidelines for Prescribed Burning, outlined in Title 17, Subchapter 2 of the California Code of Regulations, are to provide for the continuation of prescribed burning while minimizing smoke impacts on the public. The State's general policy since 2018 is to increase the pace and scale of prescribed burning statewide as long as smoke exposure risks can be effectively reduced. Prescribed burning is defined in the Health and Safety Code §39011, as:

*(a) Agricultural operations in the growing of crops or raising of fowl or animals, or open outdoor fires used in forest management, range improvement, or the improvement of land for wildlife and game habitat, or disease or pest prevention.*

*(b) The operation or maintenance of a system for the delivery of water for the purposes specified in subdivision (a).*

*(c) Wildland vegetation management burning.*

*(1) For purposes of this subdivision, wildland vegetation management burning is the use of prescribed burning conducted by a public agency, or through a cooperative agreement or contract involving a public agency, to burn land predominantly covered with chaparral, trees, grass, or standing brush.*

*(2) For purposes of this subdivision, prescribed burning is the planned application and confinement of fire to wildland fuels on lands selected in advance of that application to achieve any of the following objectives:*

*(A) Prevention of high-intensity wildland fires through reduction of the volume and continuity of wildland fuels.*

*(B) Watershed management.*

*(C) Range improvement.*

*(D) Vegetation management.*

*(E) Forest improvement.*

*(F) Wildlife habitat improvement.*

*(G) Air quality maintenance.*

*(3) The planned application of fire may include natural or accidental ignition.*

This definition supersedes the definition found in Title 17 §80101(v).

## C. Policies and Procedures

The following outlines the necessary steps required to conduct a prescribed burn. These procedures do not apply to Agricultural burning as defined in H&S Code Sections §39011(a) and 39011(b) of the Health and Safety Code.

1. Burn projects that are either greater than 10 acres or are estimated to produce more than 1 ton of smoke must submit a smoke management plan (SMP) to the air district where burning will occur.
2. The SMP may be submitted either:
  - a. by paper form, utilizing either the SMP form from CARB, or a District created form, or the SMP form from the Program,
  - b. or may be submitted through the Prescribed Fire Information Reporting System (PFIRS) website
  - c. or by submitting a SMP as per the district of jurisdiction's burn rules.
3. Approval of the SMP from the district of jurisdiction.
4. Obtain a district permit to burn.
5. Request authorization to the district the burn will take place in no later than the afternoon prior to the requested burn day.
6. Maintain communication with the district and report the burn status along with the acres burned upon its conclusion.

Unless otherwise required by a district's rules, it is intended that the district of jurisdiction will approve the proposed burn through the PFIRS website so brief burn information can be displayed on the PFIRS publicly available map the day the burn is to take place.

CARB provides a 48-hour forecast, 72-hour outlook, and a 96-hour trend through PFIRS. Per §80145(f) of Title 17 the district may request 48-hour forecasts, 72-hour outlooks, and 96-hour trends for specific prescribed burns. This precedes the use of PFIRS in providing this now more universally throughout the state. A district may request that CARB provide help in deciding on a burn authorization up to 24 hours in advance of the ignition. Districts may prioritize burns for disease control, economic concerns, safety etc. Districts may also give preference or reserve acres for prescribed burns in the daily burn authorization system.

If indicated, PFIRS can provide for notification to secondary and tertiary districts that a SMP has been submitted to a neighboring district. Coordination can be worked out between those districts on when the burn is authorized. Authorized burns can be seen on the PFIRS website.

During the intensive fall burn season (September 15th – November 30th), all proposed prescribed burning should be reported by the districts to the SMPC at least one day prior to ignition, if possible. This information may also be available on PFIRS, however it may not be available one day prior to ignition. This distribution of burn information can promote coordination and enhance the monitoring of agricultural and prescribed burning.

Burn projects conducted below 3,000 feet msl, or below the daily variable elevation level, will be considered part of the local acreage distribution. CARB may adjust the elevation threshold for burn decisions in the lower elevations versus higher elevations, pursuant to §80250 (a and b). CARB will

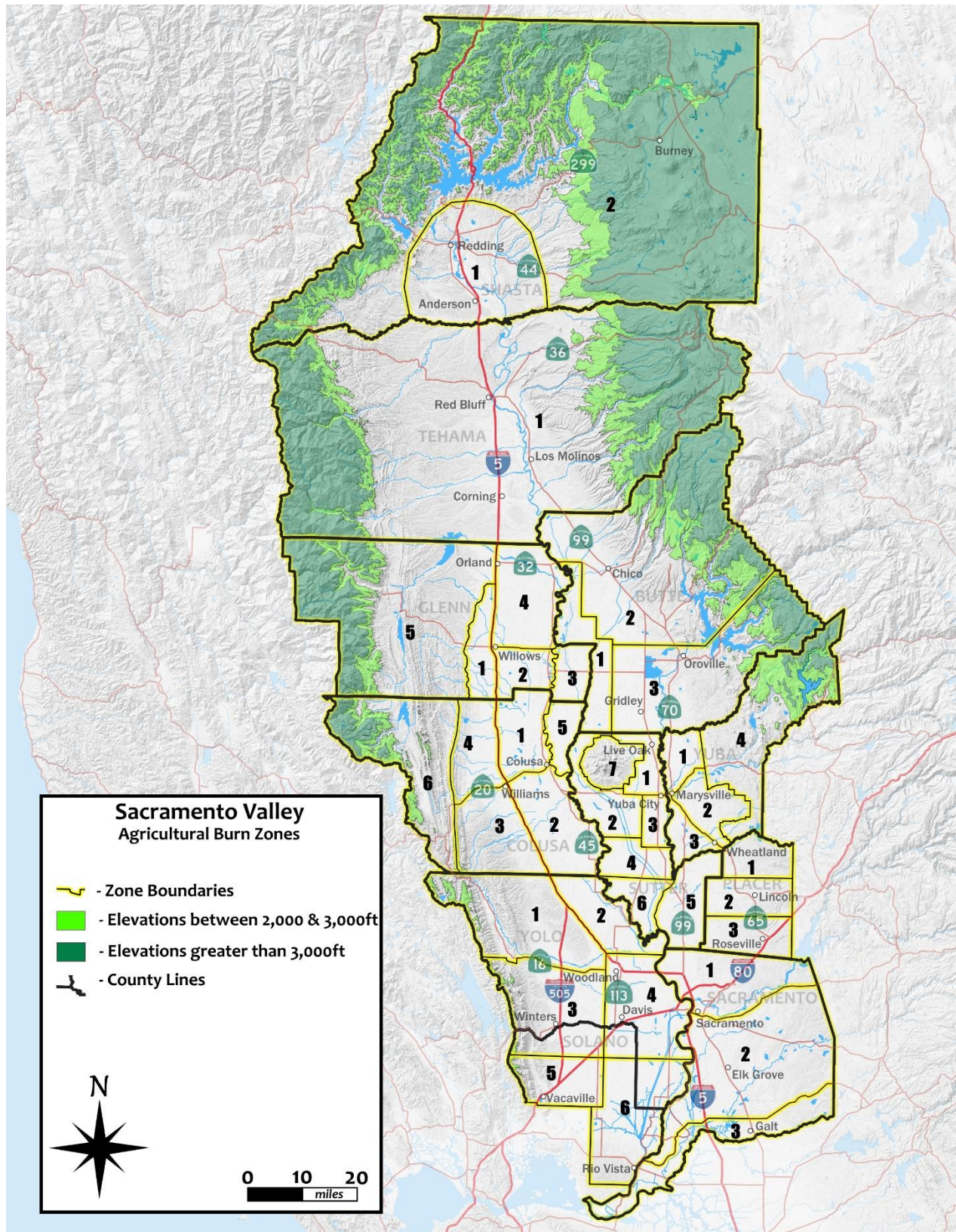
consider revising a no-burn decision above the daily variable elevation level when the local district makes a request based upon review of local meteorological and air quality conditions. When there is an authorization request to burn at or below the daily variable elevation level, the districts must provide notification to the SMPC what is the scheduled day of burning to allow planning for allocation and distribution of acreage. For prescribed burns below the daily variable elevation level, the SMPC will, if possible, take the acreage needed for those burns out of any excess acreage available over the initial allocation but below the interim allocation limit.

If burn projects greater than 10 acres are conducted outside of intensive fall burn season, or during intensive fall burn season and are above the daily variable elevation level, the proposed acreage will not be considered part of the local acreage distribution.



# APPENDIX A

## SACRAMENTO VALLEY AGRICULTURAL BURNING MANAGEMENT ZONES MAP



# APPENDIX B

## Intensive Fall Burn Season

The intensive fall burn season commences on September 15th and generally concludes on November 30th, but may be terminated early or be extended depending on field and/or weather conditions. During this time, the SMPC and meteorological service provider collaborate with CARB regarding forecast burn conditions and burn day decisions for the intensive rice burn season.

The SMPC acts as a liaison between CARB, the meteorological service provider, and each air district to facilitate better and more timely communication between each entity.

### SMPC responsibilities:

1. Collect, compile, and archive meteorological data, public complaint information and daily burn data submitted by each air district.
2. Determine burn day status in collaboration with CARB.
3. Distribute daily acreage allocations to each district.
4. Conditionally allocate extra acreage to districts that request additional acres (weather permitting).
5. Advises individual air districts regarding burn placement and/or local burn day decisions.
6. Provide training sessions (Found in Appendix C) for air district personnel prior to the commencement of the intensive fall burn season.
7. Generate updates and summary reports to be presented to the TAC and BCC.
8. Coordinate any amendments or changes to the SVAB smoke management program.

The meteorological service provider assists the SMPC and CARB by providing in depth daily forecasts and forecast discussions (issued at 5:45 AM, 9:00 AM and 10:30 AM) and provides direct meteorological support to districts with questions pertaining to current or forecast conditions.

### Meteorological service provider responsibilities:

1. Issue detailed daily forecast files discussing mixing heights, stability, precipitation chances and wind speed at the surface and aloft.
2. Compile CARB burn day status, CARB forecasts and SMPC comments onto the 9AM file.
3. Distribute program files to air district personnel.
4. Host a centralized website and database containing:
  - a. Current weather observations
  - b. Satellite and radar observations
  - c. Archived weather data
  - d. Links to other weather-related tools
  - e. Archived program files
  - f. Links to current forecast and program files
5. Host 9:30 AM conference call.

Answer any questions regarding current or forecast weather conditions from air district staff.

### 10E: CARB Burn Day Decision Statement:

Notwithstanding the criteria listed in Title 17 for the Sacramento Valley air basin, the Air Resources Board may announce permissive burn, marginal-burn, or no burn days based on expected meteorological conditions and on the estimated effect on air quality of the agricultural burning and prescribed burning.

# APPENDIX C

## Intensive Fall Burn Season Training Sessions

Prior to the commencement of each intensive fall burn season, the SMPC will coordinate at least two training sessions that examine the various aspects of the Smoke Management Program. Training sessions will typically examine the following:

1. The SMP's goals, procedures, and regulations.
2. Basic meteorological training to prepare air district personnel for terminology used in forecasts.
3. How various weather patterns and scenarios impact smoke dispersion and air quality within the SVAB.
4. How to use the SMP website and database to view forecasts and utilize surface data.
5. How to submit and edit burn data for daily program files.
6. Conservative burn management.
7. Various external tools such as satellite and radar information, BAM data, PFIRS and wildfire webcams.

### Other Notes:

1. Where possible consolidate sections/subsections that discuss similar matters.
2. Reorganize sections so that contain information pertaining to similar matters are in the same general section.
3. Discuss prescribed burn section.