

GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT



GOVERNING BOARD REGULAR MEETING INFORMATION

Meeting Date & Time

Thursday, March 5, 2020 at 10:00 a.m.

Meeting Location

Mono County Board of Supervisors Chamber (2nd Floor)
Mono County Courthouse, Main Street (U.S. Highway 395)
Bridgeport, California

District Board

Matt Kingsley, Inyo County, Chair
Fred Stump, Mono County, Vice Chair
Ron Hames, Alpine County
John Peters, Mono County
John Wentworth, Town of Mammoth Lakes
David Griffith, Alpine County
Dan Totheroh, Inyo County

Phillip L. Kiddoo, Air Pollution Control Officer
157 Short Street, Bishop, California 93514
(760) 872-8211 E-mail: pkiddoo@gbuapcd.org



Great Basin Unified Air Pollution Control District

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

NOTICE OF PUBLIC HEARING GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT REVIEW OF 2020-2021 GENERAL FUND AND SB 270 BUDGETS AND ORDER

The Governing Board of the Great Basin Unified Air Pollution Control District will conduct a public hearing for the purpose of reviewing the District's annual budgets and proposed California Health and Safety Code Section 42316 fee order for the 2020-2021 fiscal year and to provide the public with an opportunity to comment on the proposed budgets. It should be noted that a portion of the budget is funded through an order authorized by California Health and Safety Code Section 42316, which requires the City of Los Angeles to pay fees to the District based on an estimate of the actual costs to the District of its activities associated with the development of mitigation measures and related air quality analysis associated with the air quality impacts of the City of Los Angeles' water diversion, conveyance and storage activities. The FY 2020-2021 General Fund budget may include an automatic adjustment to permit fees to account for changes in the California Consumer Price Index. The budgets will not be adopted at the same meeting during which this public hearing is conducted. Rather, the Governing Board will consider adoption of the budgets at its next regular meeting, scheduled for May 7, 2020.

The public hearing will be conducted at a regular meeting of the District Governing Board to be held at 10:00 a.m. on Thursday, March 5, 2020, at the Mono County Supervisors Chamber (2nd Floor), Mono County Courthouse, Main Street (U.S. Highway 395), Bridgeport, California 93517. The public hearing on the District's total annual budgets is set for 10:05 a.m. Written comments are invited, and should be addressed to Phillip L. Kiddoo, Air Pollution Control Officer, Great Basin Unified Air Pollution Control District, 157 Short Street, Bishop, California 93514. Written comments received by close of business on Wednesday, February 19, 2020, will be included in the staff report sent to the Governing Board members. Comments may also be made during the public hearing. For further information, call the District's Board Clerk, Tori DeHaven at (760) 872-8211.

Publication Dates

Inyo Register	January 30 & February 1, 2020
The Sheet	February 1 & February 8, 2020
Tahoe Daily Tribune	January 31 & February 7, 2020
Record Courier	January 30 & February 1, 2020



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 www.gbupcd.org

NOTICE OF PUBLIC HEARING

CONSIDERATION OF AMENDMENTS TO RULE 411 WILDLAND VEGETATION MANAGEMENT BURNING IN WILDLAND AND WILDLAND/URBAN INTERFACES and the SMOKE MANAGEMENT PROGRAM

The Governing Board of the Great Basin Unified Air Pollution Control District will consider amendments to the District's Smoke Management Program and to District Rule 411- Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interfaces, at a public hearing which will be held at the regular meeting of the District Governing Board scheduled for Thursday, March 5, 2020, at the Mono County Supervisors Chamber (2nd Floor), Mono County Courthouse, Main Street (U.S. Highway 395), Bridgeport, California 93517. The public hearing is scheduled to begin at 10:20 a.m.

Copies of the proposed program and rule amendments, along with a written analysis of the proposed rule amendment, are available for public review at the Great Basin Unified Air Pollution Control District office at 157 Short Street, Bishop, California, and copies may be requested by contacting the District. Written comments on the program and rule amendments should be sent to Ann Logan, Deputy Air Pollution Control Officer, Great Basin Unified Air Pollution Control District, 157 Short Street, Bishop, CA 93514. Comments may also be submitted by e-mail to ann@gbupcd.org. Comments received by Wednesday, February 19, 2020 will be included in the staff report; comments received after that day and before the public hearing will be summarized by staff and presented to the Board at the meeting. Written or verbal comments may also be made at the public hearing.

Publication:

Inyo Register	January 30 & February 1, 2020
The Sheet	February 1 & February 8, 2020
Record Courier	January 30 & February 1, 2020
Tahoe Daily Tribune	January 31 & February 7, 2020



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 www.gbupcd.org

GOVERNING BOARD REGULAR MEETING AGENDA

THURSDAY, MARCH 5, 2020 AT 10:00 AM

**Mono County Board of Supervisors Chamber (2nd Floor)
Mono County Courthouse, Main Street (U.S. Highway 395)
Bridgeport, California**

Assistance for those with disabilities: If you have a disability and need accommodation to participate in the meeting, please call Tori DeHaven, Board Clerk, at (760) 872-8211 for assistance so the necessary arrangements can be made.

Great Basin Unified Air Pollution Control District is a California regional government agency that works to protect the people and the environment of Alpine, Mono and Inyo Counties from the harmful effects of air pollution.

1. Call to Order and Pledge of Allegiance
2. Public Comment on Matters not on the Agenda (No Action)
3. Election of Governing Chair and Vice Chair for 2020 (Action)1
4. **10:05 a.m.: PUBLIC HEARING - Fiscal Year 2020-2021 Total District Budget** – Staff Report and Public Comments on the Draft General Fund and SB 270 Sub-budgets (No Action – First of Two Required Budget Hearings)2
5. **10:20 a.m.: PUBLIC HEARING** – Consideration of Amendments to Rule 411 Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interfaces and the Smoke Management Program (Action)55
6. Consent Items (Action)
 - a. Approval of January 9, 2020 Governing Board Meeting Minutes172
 - b. Waiver of District Rule 1102 Annual \$0.55 Per Capita Town and Counties Assessment Fee for Fiscal Year 2020-2021178
 - c. Waiver of Consumer Price Index Increase to District Fees for Fiscal Year 2020-2021179
 - d. Approval of Purchase Order with Greenheart Farms, of Arroyo Grande, California, a Sole-Source Provider, for Propagation and Delivery of 10,000 Native Shrubs for the Keeler Dunes Project for an Amount not to Exceed \$29,489.08.180
 - e. Approval of Draft Updated Unification Agreement183
7. Informational Items (No Action)
 - a. FY 2019-2020 2nd Quarter Financial Reports (Oct 1 - Dec 31)202
 - b. Travel Report210
 - c. Permit Enforcement Activity Report211
 - d. Final Report on 2018 Woodsmoke Reduction Program212

8. Board Member Reports (No Action)
9. Air Pollution Control Officer Report (No Action)214
10. **CLOSED SESSION – CONFERENCE WITH LEGAL COUNSEL – EXISTING LITIGATION:**
 - a. Russell Covington; Robert Moore; Randy Sipes; Randal Sipes, Jr.; Laborers’ International Union of North America Local Union No. 783 vs. Great Basin Unified Air Pollution Control District; Mono County Superior Court, Case No. CV140075; pursuant to subdivision (a) of Section 54956.9 of the California Government Code.
11. Adjournment

(All Meetings Are Electronically Recorded – All public records relating to an agenda item on this agenda are available for public inspection at the time the record is distributed to all, or a majority of all, members of the Board. Such records shall be available at the District office located at 157 Short Street, Bishop, California.)



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Tori DeHaven, Clerk of the Board

Subject: Election of Governing Chair and Vice-Chair for 2020

Each year, after January, when Great Basin's member agencies appoint their representatives to the District Governing Board, the Board elects its Chair and Vice-Chair for the calendar year. Although the Governing Board is not restricted in any way in the selection of officers, historically the Board has observed a rotation of positions among the four government agencies that compose the District. The rotation order has been Alpine, Inyo, Mono and Mammoth Lakes. If that rotation is to be observed this year, it is Mono County's turn as the Chair (Fred Stump or John Peters) with Mammoth Lakes as the Vice-Chair (John Wentworth). Matt Kingsley was the Chair and Fred Stump was the Vice-Chair for 2019; staff thanks both for their service.

Fiscal Impact

None.

Board Action:

Staff recommends that the Board nominate and elect a Chair and Vice-Chair for 2020.

Election of Governing Chair and Vice-Chair for 2020 (Action)

March 5, 2020 – Agenda Item No. 3 – Page 1



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 6, 2020

To: District Governing Board

From: Phillip Kiddoo, Air Pollution Control Officer
Susan Cash, Administrative Projects Manager

Subject: **Public Hearing** – Fiscal Year 2020-2021 Total District Budget -
Staff Report and Public Comments on the Draft General Fund and SB 270 Sub-Budgets
(No Action – First of Two Required Budget Hearings)

State law requires that all air pollution control districts hold a public hearing on their proposed budget at a meeting separated by at least two weeks from the meeting at which they adopt the budget (H&SC §40131). Today's public hearing is on the entire District budget, including the sub-budgets referred to as the "General Fund (GF)" budget and the "SB 270" budget. Those proposed sub-budgets are discussed in this report. No formal action for approval of the budget is to be taken at this time. Instructions can be given to staff to modify the budget based upon Board and public input at the hearing and other decisions made during the regular meeting. The budget will be considered for adoption at the Board's May meeting.

The draft budget was available for public comment 30 days before this hearing and was emailed to the Los Angeles Department of Water and Power (LADWP) on February 5, 2020. No comments were received from the general public by the close of business February 19, 2020 in time to be included in the board packet. LADWP submitted written comments on February 18, 2020; the comments as well as staff response are attached. Additionally, an error in the SB270 Fiscal Year 2019-2020 employee cost figures was corrected, and an update was sent to LADWP on February 25, 2020. That corrected version is attached to this report.

Fiscal Impact

The proposed total budget for all 2020-2021 District activities is \$7,841,466. This is \$353,301 more or a 4.72% increase from the 2019-2020 total budget of \$7,488,165. Details of the specific increase and decreases can be found in the attached draft budget. Total District costs will be funded by a combination of permit fees, state subvention, project funds and SB270 fees charged to the City of Los Angeles.

Public Hearing – Fiscal Year 2020-2021 Total District Budget -
Staff Report and Public Comments on the Draft General Fund and SB 270 Sub-Budgets
(No Action – First of Two Required Budget Hearings)
March 6, 2020 – Agenda Item No. 4 – Page 1 of 2

Board Action:

Staff recommends that the Board conduct the first (of two) public hearing on the total budget, consisting of the General Fund and SB 270 sub-budgets and direct staff to make any changes based upon the results of the public hearing. The budget is a no-action item at this time but will be considered for adoption at the May 2020 Board meeting.

Attachments:

1. 2020-2021 Fiscal Year Budget and SB270 Fee Assessment
2. Letter from Nelson O. Mejia, Manager of Owens Lake Dust Mitigation Program, Los Angeles Department of Water and Power, dated February 18, 2020
3. Letter to Nelson O. Mejia from Phillip L. Kiddoo, dated February 24, 2020, responding to Mr. Mejia's February 18, 2020 letter



Great Basin Unified Air Pollution Control District

2020-2021 Fiscal Year Budget and SB270 Fee Assessment

Draft – February 4, 2020

(Correction to SB270 FY 2019-2020 Employee Costs issued February 25, 2020)

***Phillip L. Kiddoo, Air Pollution Control Officer
157 Short Street, Bishop, California 93514
Tel: (760) 872-8211
Fax: (760) 872-6109
E-mail: pkiddoo@gbuapcd.org***

Contents

Introduction	- 1 -
I. General Fund Budget	- 2 -
General Fund	- 2 -
Keeler Dunes Dust Control Project Budget	- 3 -
II. SB 270 Budget and Fee Assessment	- 4 -
SB 270 Budget	- 4 -
Owens Lake Scientific Advisory Panel (OLSAP)	- 6 -
III. Tables and Figures	- 7 -
Table 1–Total Budget	- 8 -
Table 2 – FY 2020-2021 General Fund Revenues	- 9 -
Table 3 – FY 2020-2021 General Fund Expenses	- 10 -
Table 4 – FY 2020-2021 Employee Time Allocation	- 11 -
Table 5 – FY 2020-2021 General Fund Keeler Dunes	- 12 -
Table 6 – SB 270 Fee Summary	- 13 -
Figure 1 – Historic SB 270 Fee Assessments	- 14 -
Table 7 – SB 270 Expenses	- 15 -
Table 8 – Professional Services over \$25,000	- 16 -
IV. Budget Narratives	- 17 -

INTRODUCTION

This document contains the Recommended Budget for Fiscal Year 2020-2021 for the Great Basin Unified Air Pollution Control District. The District budget is comprised of two major components: General Fund and SB270 (Table 1).

General Fund

The General Fund budget is crafted to provide adequate resources to fulfill the District's mission:

The Great Basin Unified Air Pollution Control District is a California regional government agency that works to protect the people and the environment of Alpine, Mono, and Inyo Counties from the harmful effects of air pollution.

as well as the District's Purpose:

The Great Basin Unified Air Pollution Control District's purpose is to ensure that all federal and state air quality standards are met through Alpine, Mono, and Inyo Counties to protect the health, welfare, and environment of the people within the District. In order to effectively meet these standards, the District, primarily through education and cooperation, enforces federal and state laws delegated to it and, as necessary, adopts and enforces local regulations.

SB 270

The annual SB 270 fee assessment is the Great Basin Unified Air Pollution Control District's (District) estimate of the reasonable cost of maintaining the level of effort necessary to address violations of state and federal air quality standards due to water-gathering activities by the City of Los Angeles Department of Water and Power (LADWP) within the District's boundaries (Inyo, Mono, and Alpine counties). The assessment is a reasonable fee as provided for in Section 42316 of the California Health and Safety Code. The fee funds the cost of monitoring air quality impacts caused by the LADWP's water-gathering activities, the development of air quality plans, monitoring the LADWP's implementation of control measures, enforcing control measure performance, and control measure research.

The narratives included as a part of this budget document describe the specifics of each division's functions and workload impacts, as well as efficiencies and streamlining measures being implemented.

The Recommended Budget is balanced, with adequate reserves and contingencies. The resources contained in the budget will enable the District to continue to provide excellent customer service, processing of permit applications and fulfill all state and federal mandates in a timely fashion.

I. GENERAL FUND BUDGET

The General Fund (GF) Budget is funded primarily by permit/air monitoring fees (~65%), and various state and federal funds (~35%). The General Fund budget covers the permitting of commercial sources, air quality planning and monitoring not associated with the water-gathering activities of the LADWP, and enforcement of air quality rules and regulations.

The GF contains a special sub-account initially funded by the \$10,000,000 public benefit contribution from the LADWP to control PM10 emissions at the Keeler Dunes as a result of the 2013 Settlement Agreement.

General Fund

The main General Fund (GF) Budget for fiscal year FY 2020-2021 is \$809,500. Compared to FY 2019-2020, the budget is estimated to be \$236,128 lower (-22.58%).

Revenues:

Revenues for the FY 2020-2021 General Fund budget (Table 2) are projected to decrease by \$236,128 (-22.58%) mainly due to a decrease in Woodsmoke Reduction Program funding offset by additional state funding, and no transfer from reserves. It is anticipated that the State subvention allocation will remain steady, as the District has received its full allocation the past five fiscal years and there has been no word of reductions.

FY 2020-2021 revenue incorporates the Governing Board's waiver of the per capita revenue source (later on today's agenda). Given the District's reserve policy, fee payers and permit holders did not see an out-of-pocket fee increase the last seven years (FY 2012-2013, 2013-2014, 2014-2015, 2015-2016, 2016-2017, 2017-2018 and 2019-2020) and based on the current proposed budget, this will again occur in FY 2020-2021. The District annually calculates and adjusts the fees due based on the Consumer Price Index (CPI) and the Governing Board must take action annually to waive the automatic CPI increase. Should the CPI waiver be approved, a rebate or subsidy of that amount for that fiscal year is applied and reflected on the invoice. If in a subsequent year the CPI waiver does not apply, then the difference, as opposed to cumulative, in the CPI rate from the last adjustment and the current CPI rate will be in effect and invoiced.

Expenses:

Expenses for the FY 2020-2021 General Fund budget (Table 3) are projected to decrease by \$23,496 (-2.82%) mainly due to a decrease in Capital Outlay.

Employee Costs:

Normal employee costs are up by \$20,504 (3.57%) primarily due to an increase in health costs (both the rates and the coverage situation of employees in this budget unit), offset by a decrease in wages and retirement benefits for newer Public Employees' Pension Reform Act

(PEPRA) employees that replaced Classic employees in Fiscal Year 2019-2020. This budget also reflects an additional 10% of the employee costs associated with the Air Pollution Control Officer and the Deputy Air Pollution Control Officer to reflect a shift in time spent on General Fund programs. There are 3.85 FTEs associated with the GF budget (Table 5).

Operating and Compliance

Operating and Compliance is anticipated to have a modest increase of \$3,000 (2.12%).

Capital Outlay

Capital Outlay is anticipated to have a decrease of \$47,000 (-40.17%) as the Fiscal Year 2019-2020 included the cost of a replacement vehicle, and this year's budget does not.

Keeler Dunes Dust Control Project Budget

The District is implementing the Keeler Dunes Dust Control Project per the 2013 Settlement Agreement between the District and the City of Los Angeles Department of Water and Power (LADWP). Project construction began in September 2014. The project was originally designed to be completed in December 2017 but has been extended to allow for continued remediation efforts in the project.

Table 5 contains the historic revenues and expenses of this project, as well as the Fiscal Year 2020-2021 budget. Staff anticipates \$551,966 in expenses this fiscal year. However, the trust only has \$336,314 remaining should all expenses anticipated in Fiscal year 2019-2020 occur; the Fiscal Year 2020-2021 budget anticipates the need to transfer \$215,652 from the GF Reserves to balance the budget.

II. SB 270 BUDGET AND FEE ASSESSMENT

The SB 270 fee includes the estimated cost of all District employees (wages and benefits), operating costs (rent, utilities, insurance, supplies, travel and professional services associated with regular budget activities), and equipment costs associated with compliance monitoring and enforcement of the LADWP's efforts to control the air pollution caused by its water-gathering activities in the District. The proposed fee total is \$6,480,000. Compared to the 2019-2020 fee total of \$6,172,169, the proposed fee total represents an increase of 4.99% (\$307,831). The 2020-2021 budget contains estimates in each category to meet commitments made by the District in the 2016 SIP Board Order, Phase 9/10 EIR, December 2014 Stipulated Judgment, and 2010 Coso Junction Maintenance Plan. The assessment is summarized in Table 6, with further detailed budget items in Table 7. A graphic comparison of this year's assessment with previous years is shown in Figure 1.

The Stipulated Judgment entered by the California Superior Court on December 30, 2014 (2014 Stipulated Judgment) included resolutions of several dust control matters at Owens Lake. It also provides for financial support by the LADWP for the Owens Lake Scientific Advisory Panel (OLSAP). The District entered into a contract with the National Academy of Sciences on November 1, 2018 (Board Order #181101-04). The OLSAP then began working on the first task which is scheduled to conclude in April 2020. Additional funding was included in the FY 2019-2020 budget to allow the OLSAP to finish the first task and start a second. For FY 2020-2021, the District has budgeted \$750,000 to allow for OLSAP work on a second task.

SB 270 Budget

The 2020-2021 proposed SB 270 budget total is \$6,480,000. Compared to the 2019-2020 fee total of \$6,172,169 the proposed assessment represents an increase of \$307,831 (Summary, Table 6; Detail Table 7).

Employee Costs

Since SB 270 was incorporated into the California Health & Safety Code in 1983, the District has assessed fees to the LADWP for the cost of employees and employee overhead associated with the development, implementation and enforcement of dust controls associated with the LADWP's water-gathering activities in the District. For FY 2020-2021, it is proposed that the SB 270 fee assessment pay for a total of 19.55 full-time-equivalent employees (FTE) (See Table 4). This budget proposes a shift of allocation for the Air Pollution Control Officer and the Deputy Air Pollution Control Officer, decreasing each positions' allocation to the SB 270 portion by 10%. This is a decrease of 0.20 FTE (-0.98%) compared to FY 2019-2020 and a reduction of 3.17 FTEs (-13.95%) since FY 2008-2009. At this time, it is expected that 19.55 FTE is adequate to continue implementing terms under the 2014 Stipulated Judgment and requirements of the 2016 SIP.

Total employee costs are estimated to be \$3,230,000, an increase of 2.79% (\$87,612) over FY 2019-2020. This category includes an allocation of wages, retirement, medical benefits, taxes, unfunded liability for future retiree medical insurance and workers compensation insurance. Other factors reflected in the employee costs section include regular reclassification opportunities, regular step increases, retirement expenses, payroll taxes and workers compensation insurance. The major components of the decrease are as follows:

- Approximately \$58,000 increase in normal employee wage increases (scheduled step increases and reclassifications, as well as negotiated COLAs) including associated tax, and workers' compensation increases predicated on wage, offset by the .20 FTE decrease.
- Health insurance increase of \$30,000 to cover known 2020 rates and anticipation of an additional 6% increase in calendar year 2021 based on trends.

The FY 2020-2021 budget proposes:

- 12.00 FTEs to perform air quality monitoring and dust source identification at Owens Lake and Mono Lake, including design, purchasing, installation, data collection, maintenance, calibration, filter weighing, quality assurance, data review, and supervision.
- 2.85 FTEs to do data processing and analysis, preparation of maps and figures, maintenance of the Geographic Information System (GIS), operation of the Owens Lake Health Advisory Network, and purchasing and maintenance of all computer hardware/software.
- 2.70 FTEs to cover all administrative tasks such as policy recommendations to the Board, overall supervision, project design and management, contract management, document preparation, technical supervision, engineering design, compliance enforcement, government agency coordination, budget preparation, technical support to legal consultants, risk manager, personnel manager and public information.
- 2.0 FTEs to act as administrative assistants, receptionist, document copier, mail clerk, file clerk, supply clerk, billing clerk, fiscal supervisor, fiscal clerk/technician, safety clerk, and board clerk.

Operating & Compliance

This category includes a proportional allocation of rent for all offices (two offices in Bishop and the Keeler office), utilities, insurance, office supplies and equipment, travel and professional services. Materials and equipment in this category generally have a cost of less than \$5,000 each and/or a short life. Estimated operating costs are \$2,260,000 which represents a decrease of \$114,000 or -4.8% compared to FY 2019-2020. The major components of the decrease are as follows:

- \$100,000 decrease in control measure testing due to a better understanding of anticipated needs for a T32-2 pilot study.
- \$62,000 decrease in Maintenance and Repairs of Equipment due to replacement equipment being purchased in the last few years.

This category also includes Professional Services. Anticipated contracts in excess of \$25,000 are listed in Table 9.

Capital Outlay

This category includes materials and equipment not associated with general support. This equipment has a higher per item cost (more than \$5,000 each or as a whole) and a longer life. Materials and equipment costs in this category may vary substantially from year to year due to specific plans for equipment purchases. For FY 2020-2021, \$240,000 is budgeted, a decrease of \$215,000 or -47.25%.

- \$170,000 decrease in equipment; major purchases have been made the past few years.
- \$45,000 decrease in vehicle purchases; no purchases are anticipated.

Owens Lake Scientific Advisory Panel (OLSAP)

The 2014 Stipulated Judgment provides for financial support by the LADWP of the OLSAP. Funding for the OLSAP will be made pursuant to fee orders by the District per California Health & Safety Code §42316. The fee order for OLSAP may vary based on the statement of work and tasks submitted to the National Academy of Sciences (NAS). Annual funding for the NAS to create and direct the OLSAP to address the tasks provided by the sponsors may range from \$500,000 to \$750,000. Additional funding up to \$2,000,000 annually may be required by LADWP for reporting and analyzing new and relevant testing data deemed necessary to address assigned OLSAP tasks. The first task is scheduled to be concluded in April 2020 and a second task started soon thereafter. In order to continue a second task for FY 2020-2021, the budget includes \$750,000. This represents an increase over Fiscal Year 2019-2020 of \$549,219.

Any remaining OLSAP funds in the SB 270 budget at the completion of NAS contracting and OLSAP work will be credited to the SB 270 fee for the subsequent fiscal year. The SB 270 fee assessment will be credited by the amount of unspent funds from the OLSAP budget line item to the SB 270 total operating budget.

III. TABLES AND FIGURES

TABLE 1

TOTAL GBUAPCD BUDGET

FY 2020-21 GENERAL FUND AND SB 270 BUDGET			
	2019-2020	2020-2021	% Change
GENERAL FUND			
I. Employee Costs	574,496	595,000	3.57%
II. Operating & Compliance	141,500	144,500	2.12%
III. Capital Outlay	117,000	70,000	-40.17%
Sub-Total General Fund	832,996	809,500	-2.82%
IV. Keeler Dunes	483,000	551,966	14.28%
Total General Fund	1,315,996	1,361,466	3.46%
SB 270 FEE			
I. Employee Costs	3,142,388	3,230,000	2.79%
II. Operating & Compliance	2,374,000	2,260,000	-4.80%
III. Capital Outlay	455,000	240,000	-47.25%
Sub-Total SB 270 Fee	5,971,388	5,730,000	-4.04%
IV. Owens Lake Scientific Advisory Panel	200,781	750,000	
Total SB 270 Fee	6,172,169	6,480,000	4.99%
TOTAL GENERAL FUND AND SB 270 BUDGET	7,488,165	7,841,466	4.72%

TABLE 2

FY 2020-2021 GENERAL FUND REVENUES

REVENUE	2019-2020	2020-2021	% change
I. Fees, Permits & Penalties			
A. AB2588 - Toxic Hot Spots	4,000	4,000	0.00%
B. Conservation Mgmt Plan/Prescribed Burn Plan	5,000	6,000	20.00%
C. Geothermal	310,000	305,000	-1.61%
D. Hearing Board	-	-	0.00%
E. Initial Permit Fees (FF, ATC, Mods)	30,000	23,000	-23.33%
F. Penalties & Late Fees	12,000	12,000	0.00%
G. Sources (Asbestos, Diesel, Fuel, Electric, PERP)	128,500	104,000	-19.07%
H. Service Station Vapor Recovery	15,000	15,000	0.00%
Fees, Permits & Penalties	504,500	469,000	-7.04%
II. Other Revenue			
A. Air Monitoring Audits	0	0	0.00%
B. Interest	20,000	20,000	0.00%
C. Per Capita Fee	0	0	0.00%
D. Sales, Services, Fees, Rebates & Refunds	5,000	3,766	-24.68%
E. State Subvention (3 counties)	138,500	138,500	0.00%
F. Town of Mammoth Lakes (Air Monitoring)	25,000	25,000	0.00%
G. State Funding (WRP, AB 197, AB 617)	145,494	63,100	-56.63%
H. Federal Funding (EPA 105, EPA PM 2.5)	90,134	90,134	0.00%
I. From Reserves	117,000		-100.00%
Other Revenue	541,128	340,500	-37.08%
FY 2020-21 TOTAL GENERAL FUND REVENUE	1,045,628	809,500	-22.58%

TABLE 3

FY 2020-21 **GENERAL FUND EXPENSES**

EXPENSES	2019-2020 Budget	2020-2021 Budget	% Change
I. Employee Costs			
A. Employee Wages	367,404	352,500	-4.06%
B. Retirement	74,261	57,500	-22.57%
C. Insurance Benefits	63,908	117,500	83.86%
D. Taxes	65,423	62,500	-4.47%
E. Worker's Compensation Insurance	3,500	5,000	42.86%
Employee costs	574,496	595,000	3.57%
II. Operating & Compliance Costs			
A. Advertising - Legal Notices & Ads	3,000	2,500	-16.67%
B. Dues, Subscriptions, Education, Use Tax, Fees, AB2588	12,000	16,000	33.33%
C. Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software, Furniture (<\$5,000 ea)	23,500	24,500	4.26%
D. Fuel & Gasoline	4,000	4,000	0.00%
E. Health & Safety	1,000	1,000	0.00%
F. Insurance - Liability, Fire & Casualty	10,500	12,500	19.05%
G. Leases & Rents: Equipment, Office, Site, Storage	9,000	9,000	0.00%
H. Maintenance & Repairs of Equipment - Labor	14,500	8,000	-44.83%
I. Maintenance & Repairs of Equipment - Materials	13,000	13,000	0.00%
J. Postage & Shipping	1,000	1,000	0.00%
K. Professional & Special Services	21,000	22,000	4.76%
L. Supplies & Tools (In Field, Office, General Use)	2,500	2,500	0.00%
M. Transportation & Travel	10,000	12,500	25.00%
N. Utilities	10,500	10,000	-4.76%
O. Public Assistance/Grant Programs	6,000	6,000	0.00%
Operating & Compliance Costs	141,500	144,500	2.12%
III. Capital Outlay			
A. Equipment: Computer, Furniture, General, Office, Scientific, Software, Furniture (>\$5,000 ea)	57,000	55,000	-3.51%
B. Capital Expenditure Fund: Vehicles & Equipment	45,000	-	-100.00%
C. Building Improvements	15,000	15,000	0.00%
Capital Outlay Costs	117,000	70,000	-40.17%
FY 2018-19 TOTAL GENERAL FUND EXPENSES	832,996	809,500	-2.82%

General Fund Reserve as of January 31, 2020	3,339,582
---	------------------

TABLE 4

FY 2020-21 Employee Time Allocation	District	Keeler	SB-270	FTE
Regular Employees				
Admin Asst/ Board & Permit Clerk	0.25	0.00	0.75	1.00
Admin. Projects Manager	0.15	0.00	0.85	1.00
Air Monitoring Specialist	0.15	0.00	0.85	1.00
Air Monitoring Tech I	0.10	0.00	0.90	1.00
Air Monitoring Tech II	0.15	0.00	0.85	1.00
Air Monitoring Tech II	0.00	0.00	1.00	1.00
Air Monitoring Tech II	0.10	0.00	0.90	1.00
Air Monitoring Tech II	0.00	0.00	1.00	1.00
Air Monitoring Technical Specialist	0.05	0.00	0.95	1.00
Air Pollution Control Officer	0.20	0.00	0.80	1.00
Air Quality Specialist I	1.00	0.00	0.00	1.00
Air Quality Specialist I	1.00	0.00	0.00	1.00
Deputy Air Pollution Control Officer	0.30	0.00	0.70	1.00
Director Technical Services	0.00	0.00	1.00	1.00
Field Services Technician II	0.00	0.00	1.00	1.00
Field Services Technician II	0.00	0.00	1.00	1.00
Field Services Technician II	0.00	0.30	0.70	1.00
Fiscal Services Technician	0.15	0.00	0.85	1.00
Research & Systems Analyst II	0.10	0.00	0.90	1.00
Research & Systems Analyst II	0.05	0.00	0.95	1.00
Research & Systems Analyst II	0.05	0.00	0.95	1.00
Senior Scientist	0.00	0.20	0.80	1.00
Sr. Systems & Research Analyst	0.05	0.00	0.95	1.00
Technical Services Specialist	0.00	0.10	0.90	1.00
Subtotal Regular Employees	3.85	0.60	19.55	24.00
TOTAL 2020-2021 FTE	3.85	0.60	19.55	24.00
TOTAL 2019-2020 FTE	3.65	0.60	19.75	24.00

SB270 FTE change 2019-2020 to 2020-2021

-0.20 -0.98%

TABLE 5

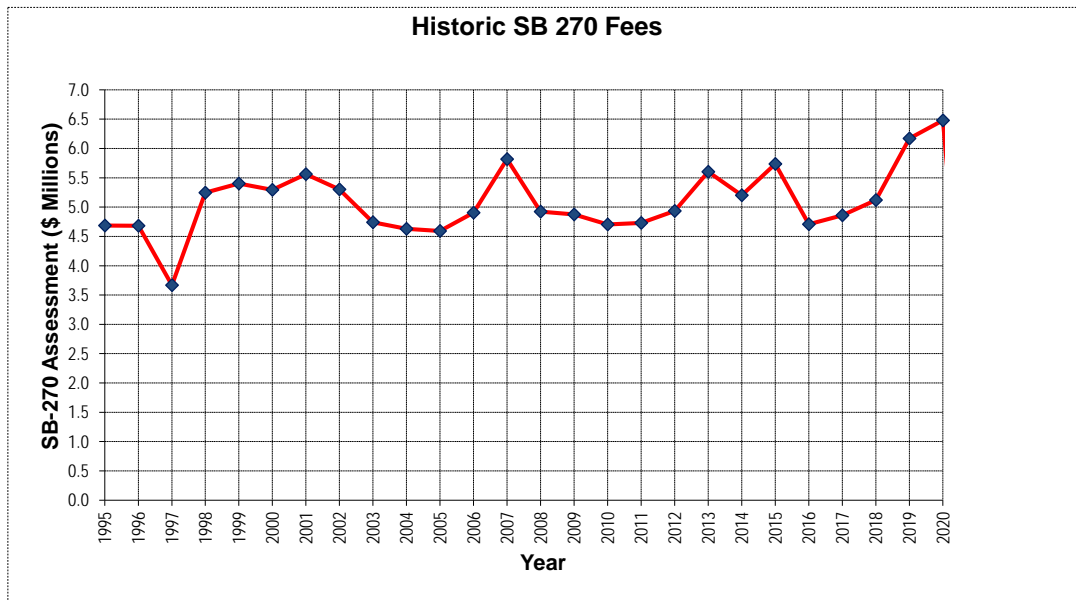
FY 2020-2021

KEELER DUNES PROJECT		2013-2019	2019-2020	2020-2021	
		Years 1-6 Actuals	Year 7 Budgeted	Year 8 Budgeted	Total
INCOME					
LADWP Public Benefit Contribution (Dec. 5, 2013)		10,000,000			10,000,000
NOV #461 transfer per B/O #161110-05		1,199,707			1,199,707
Interest		97,011			97,011
Refund from AVRCD		35,000			35,000
Refund from Myers Farms		-	70,000		70,000
From GF Reserves				215,652	215,652
		11,331,718	70,000	215,652	11,617,370
EXPENSES					
I. Administration					
A. Professional Services - AMEC, WOOD		590,304	29,000	5,000	624,304
II. Project					
A. BLM Fee		47,901	15,000	8,000	70,901
CEQA - Notice of Determination Fee		3,030	-	-	3,030
State Water Resources Control Board Fee		5,616	7,000	7,000	19,616
Fees: Other		-	-	-	-
B. EIR/EA & CEQA/NEPA: Sapphos (Dec. 1, 2013 and forward)		346,521	25,000	-	371,521
EIR & CEQA: Sapphos (Pre-Construction Cultural Survey)		18,653	-	-	18,653
C. Equipment, Seeds, Supplies, Misc.		79,297	10,000	14,000	103,297
D. Construction: Barnard, Nature's Image, ACE		7,870,722	173,000	266,000	8,309,722
E. Straw Bales: Myers Farms (March 2014)		144,442	-	-	144,442
Straw Bales: Long Valley Hay (January 2015)		260,105	-	-	260,105
Straw Bales: R.S. Green (March 2014)		181,097	-	-	181,097
Straw Bales: R.S. Green (March 2015)		93,300	-	-	93,300
Straw Bales: R.S. Green (May 2015)		42,496	-	-	42,496
F. Plant Propagation: Antelope Valley Resource/Greenhart Farms		529,108	30,000	35,000	594,108
G. Straw Bale Demonstration Test- DRI		37,218	-	-	37,218
H. KCSD Water System Upgrade		25,000	-	-	25,000
I. KCSD Irrigation Water		3,490	14,000	6,000	23,490
J. Water Well Monitoring & Lab Analysis		1,449	-	-	1,449
K. Irrigation system maintenance and repair		-	10,000	10,000	20,000
L. Field vehicle maintenance and gas		-	6,000	7,000	13,000
M. Site costs (field equipment and materials)		-	10,000	14,000	24,000
N. Additional costs for field crew		365	6,500	11,400	18,265
O. Field Oversight (WOOD or other contractor)/ACE Intern		-	41,000	50,000	91,000
P. Cultural Resource Monitoring		-	30,000	28,900	58,900
Q. Tribal Project		-	-	11,300	11,300
		-	-	-	-
III. Employee Costs					
A. Senior Scientist (.20)/Field Services Tech (.30)/Technical Svcs Spec (.10)		302,292	76,500	78,366	457,157
TOTAL KEELER DUNES		10,582,404	483,000	551,966	11,617,370

TABLE 6**FY 2020-21 SB 270 Total Fee Summary**

	2019-2020	2020-2021	% Change
Assessment Expenses			
I. Employee Costs	3,142,388	3,230,000	2.79%
II. Operating & Compliance	2,374,000	2,260,000	-4.80%
III. Capital Outlay	455,000	240,000	-47.25%
Sub-Total SB 270 Fee	5,971,388	5,730,000	-4.04%
 IV. OLSAP Assessment	 200,781	 750,000	 273.54%
 Total SB 270 Fee Assessment	 6,172,169	 6,480,000	 4.99%
 Less Reserve Policy Credit	 0	 -289,859	
 SB 270 Fee Due	 6,172,169	 6,190,141	 0.29%

FIGURE 1



Year	Amount
1995	4,686,414
1996	4,682,317
1997	3,666,543
1998	5,246,725
1999	5,403,643
2000	5,295,089
2001	5,561,270
2002	5,300,597
2003	4,739,313
2004	4,631,000

Year	Amount
2005	4,591,000
2006	4,903,825
2007	5,816,250
2008	4,922,265
2009	4,876,300
2010	4,703,600
2011	4,730,000
2012	4,934,550
2013	5,601,000
2014	5,200,000

Year	Amount
2015	5,737,000
2016	4,706,000
2017	4,859,118
2018	5,118,500
2019	6,172,169
2020	6,480,000

TABLE 7
FY 2020-21 SB 270 ASSESSMENT

EXPENSES	2019-2020 Budget	2020-2021 Budget	% change
I. Employee Costs			
A. Employee Wages	1,835,360	1,860,000	1.34%
B. Retirement	503,885	530,000	5.18%
C. Insurance Benefits	460,566	490,000	6.39%
D. Taxes	326,577	330,000	1.05%
E. Worker's Compensation Insurance	16,000	20,000	25.00%
Employee Costs	3,142,388	3,230,000	2.79%
II. Operating & Compliance			
A. Advertising - Legal Notices & Ads	1,500	5,000	233.33%
B. Dues, Subscriptions, Education, Use Tax & Fees	64,000	65,000	1.56%
C. Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea)	146,500	135,000	-7.85%
D. Fuel & Gasoline	30,000	30,000	0.00%
E. Health & Safety	5,000	5,000	0.00%
F. Insurance - Liability, Fire & Casualty	58,000	70,000	20.69%
G. Leases & Rents: Equipment, Office, Site, Storage	33,000	35,000	6.06%
H. Maintenance & Repairs of Equipment - Labor	71,000	55,000	-22.54%
I. Maintenance & Repairs of Equipment - Materials	251,000	205,000	-18.33%
J. Postage & Shipping	2,000	5,000	150.00%
K. Professional & Special Services	1,340,000	1,380,000	2.99%
L. Supplies & Tools (In-Field, Office, General Use)	27,500	25,000	-9.09%
M. Transportation & Travel	29,500	35,000	18.64%
N. Utilities	80,000	75,000	-6.25%
O. Control Measure Testing	200,000	100,000	-50.00%
P. Public Outreach & Education	10,000	10,000	0.00%
Q. Contingency Expenditures	25,000	25,000	0.00%
Operating & Compliance Costs	2,374,000	2,260,000	-4.80%
III. Capital Outlay			
A. Equipment: Computer, Furniture, General, Office, Scientific, Software, Furniture (>\$5,000 ea)	325,000	155,000	-52.31%
B. Vehicles & ATVs	45,000	0	-100.00%
C. Building and Land (From Reserve, not in 18/19 total)	0	0	0.00%
D. Building Improvements	85,000	85,000	0.00%
Capital Outlay Costs	455,000	240,000	-47.25%
Expenses Total (Parts I, II, III)	5,971,388	5,730,000	-4.04%
IV. Owens Lake Scientific Advisory Panel			
A. 2014 Stipulated Judgment (Paragraph 12.G)	200,781	750,000	273.54%
SB 270 Total Fee Assessment (Parts I - IV)	6,172,169	6,480,000	4.99%
Reserves Balance as of March 31(estimated)	1,752,417	2,447,699	
Policy Amount @ 33.3% of FY Costs (beginning FY 18/19)	2,019,905	2,157,840	
Credit to SB 270 Fee Assessment		(289,859)	
FY 2020-2021 SB 270 Fee Due	6,065,781	6,190,141	2.05%

TABLE 8
SB 270

Professional and Special Services (over \$25,000)	2019-2020	2020-2021	% Difference
Satellite Imagery	25,000	25,000	0.00%
Owens Lake Hydrologic Services	150,000	150,000	0.00%
Mono Lake Hydrologic Services	150,000	180,000	20.00%
Environmental Consulting (CRTF)	200,000	200,000	0.00%
DRI (Remote Sensing - DCM Compliance)	210,000	210,000	0.00%
King Spalding (Legal)	250,000	250,000	0.00%
Ramboll-Environ Consulting - Owens Lake and Mono Lake Air Modeling	250,000	250,000	0.00%

IV. BUDGET NARRATIVES

This section breaks down the District by functional divisions and discusses the accomplishments each division has made or will make during the FY 2019-2020, as well as the expected accomplishments for the FY 2020-2021, subject to the Governing Board's approval of the proposed budget that supports these goals.

Permitting and Enforcement Division

The Permitting and Enforcement Division enforces federal, state and local air quality rules and regulations in Alpine, Mono and Inyo Counties through regulation, permitting, planning, field inspections, enforcement and public education. The Permitting and Enforcement Division is responsible for the issuance of air quality permits for stationary equipment and the management of the resulting emissions. The Division also implements the Smoke Management Program and the Asbestos Program for the District. During the FY 2019-2020, in addition to routine permitting, inspections and handling of noncompliance issues, the Division:

- Recruited two new Air Quality Specialists to fill the vacancies left by staff retirement.
- Developed a Permitting and Enforcement Handbook that contains the standard procedures used to process, review, and issue permits; conduct inspections; respond to complaints; and, initiate enforcement actions for violations.
- Initiated work on updated District stationary source application forms and standardized permitting templates that will be implemented in FY 2020-2021.
- Continued development of an updated permitting database to modernize and improve District operations and capabilities.
- Initiated work on a revised Smoke Management Program and updates to District open outdoor burning rules. Conducted additional monitoring of prescribed burns under California Air Resource Board's prescribed fire grant.
- Implemented and reported actual emissions for stationary source facilities meeting specific thresholds to the California Air Resources Board under AB617 and AB197.

Keeler Dunes

Project Goal:

The main project goal is to create a stable self-sustaining vegetated dune system similar to other systems in the Owens Lake area to control dust emissions to attain the Federal and California State PM10 standards in the communities of Keeler and Swansea.

Project Accomplishments:

The Keeler Dunes Dust Control Project is in its sixth year of work. Two of the main components of the project (the irrigation system and straw bale placement) have been completed. The third main component, plant establishment has been more difficult than expected both in terms of getting the needed plant material and also in having plants survive in the field. There have been

six planting efforts to date. The most recent planting effort was completed in January 2020 and was modified from previous efforts with changes made based on things that have been learned over the course of the project.

Overall the project has decreased the overall amount of dust emissions in the local area and in the community of Keeler but has not yet achieved its goal of reduction in PM10 below the Federal and State standards. One of the main difficulties in achieving the project goal is the continued activity of the southern portion of the dunes such that changes to the project design have been implemented.

Although the main project goal has not yet been achieved, there are signs of success that are encouraging including: stabilization of the northern two-thirds of the project, successful planting work from January 2015, recruitment of native annual and shrub volunteers within the project during the relatively wet winter and spring of 2017 and 2019, and significant increases in observed wildlife within the dunes.

A brief synopsis of the work completed during each of the project years is provided below.

- **Year 1 (Fall 2014 to Summer 2015):** During the first year; the temporary irrigation system was installed, ~66,000 straw bales were placed, and ~15,000 plants were installed by Barnard Construction Company.
- **Year 2 (Fall 2015 to Summer 2016):** Approximately 15,000 straw bales were placed in the project to complete original bale placement design. An additional 75,000 plants were installed in the project. Supplemental irrigation events were conducted in the fall of 2015 and Spring 2016. Seed was collected by Comstock Seed in Fall of 2015 for grow-out of additional plants. Greenheart Farms was selected through bid process for propagation of 77,000 additional plants, plants and started at the nursery in Spring 2016. Supplemental irrigations of plants material were conducted in the Fall 2015 and Spring 2016.
- **Year 3 (Fall 2016 to Summer 2017):** Bale mounds were installed in Southern Dunes. Seed was collected by Comstock Seed in Fall of 2016 for grow-out of additional plants. Greenheart Farms was contracted to grow-out 25,000 additional plants, plants were started at the nursery in Spring 2017. Supplemental irrigations of planted material were conducted in Fall 2016, Spring 2017 and Summer 2017. A long-term planning effort was conducted to decide how to move forward with project and achieve the project goals.
- **Year 4 (Fall 2017 to Fall 2018):** Additional bale mounds were installed in the Northern Dune and Southern Dunes. Seed was collected by Comstock Seed in Fall of 2017 for the direct seed test and potential future grow-out of additional plants. The work design was changed to have a full-time crew of three local workers present on site in the project.

Supplemental irrigation was conducted in the fall of 2017, spring 2018 and summer 2018. Planting of 25,000 additional plants was completed in the May 2018 in specific target plant zones. The contract with Barnard Construction ended in November 2017 and a new contract was executed with Nature's Image for operation and maintenance of the project. A small-scale test of direct seeding was conducted with mixed results. Overall, direct seeding appears to be infeasible within the project due to herbivory and sand motion.

- **Year 5 (Fall 2018 to Fall 2019):** The main activity completed in 2018-2019 was providing supplemental irrigation for the plants in the project. All plants were watered in the fall of 2018, spring 2019, and summer 2019. The contract with Nature's Image was ended in February 2019. Work completed since March 2019 has been conducted by crews from the American Conservation Experience (ACE). The District also contracted with ACE for an intern to work on the project full time from July 2019 through April 2020 to help with general maintenance and operations of the project and to help with directing work crews during seasonal irrigation events. Plant propagation of 10,000 native shrubs was completed by Greenheart Farms and the plants will be placed in the ground in January-February 2020.
- **Year 6 (Fall 2019 to Fall 2020):** *In progress.* Several significant changes made to the project in spring 2019 have resulted in successful progress in getting plant establishment in the dunes. The ACE crews and the ACE intern working in the dunes have met all productivity expectations for completion of season irrigation of existing plants as well as general operation and maintenance work. 10,000 native shrubs grown out in 2019 will be planted in the project in January-February 2020. Additionally, another set of 10,000 plants will be started in the spring of 2020 by Greenheart Farms for planting in winter 2021.

Long-Term Project Plan:

The main work activity over the next year is to nurture the plants that have been installed over the past 5 years. This primarily consists of providing continued irrigation during plant establishment so that the plants mature and develop a root system capable of tapping into available moisture within the dunes so that they can survive on their own. In addition to irrigation, young plants maybe unburied if they become covered with moving sand. Due to difficulty in providing sufficient water to young recently installed plants, a change has been made in the irrigation method from hand watering to sprinkler irrigation. A small-scale test of this change was conducted with the plants installed in the January 2019 planting effort.

The protected nursery built in the Fall of 2017 in the yard at the District's Keeler field office allowed the new plants from the grow-out nursery to acclimate to the local conditions. This facility in Keeler will continue to provide space for the plants to adjust to the local conditions before being planted in the project.

The District will continue to oversee and manage the project. The main work duties in the dunes will be completed by crews from the ACE. Duties for the work crew include, irrigation of plants in the project, planting of 10,000 new native shrubs, general care of installed plants, maintenance and minor repairs of the irrigation system, removal of invasive weeds from within the project area, repair of bale mounds, and general maintenance of project infrastructure and facilities.

Air Quality Monitoring Division

The District's Air Quality Monitoring Division implements, operates and maintains the District's air quality and meteorological monitoring network, the data from which are used to determine compliance with the national ambient air quality standards (NAAQS). The data are also used to aid the District in the development of emissions control strategies that protect the public health, and are provided to the State Air Resources Board, to the United States Environmental Protection Agency (US EPA), and to the public. The District's SB270 monitoring network includes fourteen (14) active PM10 and meteorological monitoring stations and six (6) additional meteorology-only monitoring stations all of which are operated by District Air Monitoring Technicians. The Air Quality Monitoring Division operates and maintains the District's California Air Resources Board-certified PM2.5 laboratory, where all of the PM filters collected throughout the District are processed and analyzed. Additionally, the division has a Quality Assurance component which conducts quarterly audits of air quality monitors throughout the District's network.

The District Air Quality Monitoring Division staff's regular responsibilities include: 1) the determination of monitoring locations; 2) the installation of monitoring stations; 3) the operation, maintenance, and calibration of field monitors; 4) operation, maintenance, and calibration of laboratory equipment used for filter processing; 5) internal quality assurance audits of monitoring equipment; and, 6) reporting of the collected data to local, state, and federal databases which is completed by the District's Data Systems and Technology Division.

During FY 2019-2020, in addition to regular operation and maintenance of the District's stations, the Air Quality Monitoring Division made a couple of significant changes: a replacement Thermo 1405 continuous PM10 monitor was installed at the Mono Shore monitoring station and a new Thermo Partisol 2025i filter-based monitor was installed at the Lee Vining station. Goals for the upcoming fiscal year include replacement of community and non-community monitoring equipment in need of replacement with T640x, TEOM, and Partisol particulate monitors.

Additional General Fund specific activities for the Air Quality Monitoring Division include continued further refinement of the operations of gaseous monitors at the NCore station at WMRC based on the findings of the CARB's Technical Systems Audit. Goals for the future fiscal year include replacement of filter-based monitoring equipment at the Mammoth Lakes monitoring station.

103 Grant – PM2.5 Monitoring

Grant funding is provided by EPA for PM2.5 monitoring in the District. Grant levels were increased with the 2019 grant year due to the expansion of the District's PM2.5 monitoring program to include the Lee Vining and Mammoth Lakes monitoring stations. These funds are provided to offset the cost of monitoring procurement as well as annual operation and maintenance costs.

105 Grant – General Air Quality Monitoring

105 Grant funds are provided by EPA for general monitoring that is not covered by LADWP through the SB270 budget. These funds are used primarily to cover operating and maintenance costs for the EPA National Core (NCORE) monitoring station the District operates at the White Mountain Research Center near Bishop, California. This rural monitoring station is a part of the EPA's national network the data from which are used by EPA to make national regulatory decisions for the protection of public health.

105 Grant funds are also used to offset the cost of some District monitoring programs, including the Mammoth monitoring station and the E-BAM PM2.5 monitors used to monitor impacts from wildfire events in locations where a permanent monitoring station is not installed.

Owens Lake and Mono Lake Technical Services Division

The Owens Lake and Mono Lake Technical Services Division fall entirely under the SB270 budget. In addition to air quality monitoring discussed above, the Owens Lake Dust Identification Program (Dust ID) operated and maintained by the Technical Services Division performs data collection from approximately 100 co-located Cox Sand Catcher and Sensit sites (collectively, Sensit), 23 remote cameras, aerial mapping, visual observations, and field inspections. The Mono Lake Dust ID Program is a smaller network of fifteen (15) Sensit sites and two (2) remote cameras. The focus of the Technical Services Division is to locate and document emissive uncontrolled areas of lakebed as a result of the LADWP's water diversion and conveyance activities. Emissions from source areas exceeding federal and state ambient air quality standards determine specific source areas requiring dust control mitigation and abatement. As a result of approximately 48.6 square miles of dust control implementation and mitigation at Owens Lake over the past 19 years, the Owens Lake Technical Services Division now also focuses on compliance monitoring along with successful continuance of all Best Available Control Measure (BACM) performance criteria requirements.

Accomplishments during FY 2019-2020 include the completing multiyear upgrade of logging equipment on the Owens Lake. This upgrade was envisioned to take three years. Fiscal Year 2019-2020 was the third and final year of the three-year effort. Field compliance checks and test continue to be done, both visually and with the Districts existing Unmanned Aerial Vehicle (UAV) fleet. The UAV budgeted in FY 2018-2019 was delivered in the fall of 2019 and is currently undergoing District testing and final adjustments to ensure successful data collection.

This UAV allows much larger areas to be analyzed in a shorter amount of time. Once staff has finished final adjustments, data collection will begin in early spring. Staff has also continued to work on developing a small air quality monitoring program that can be located around areas of interest on the Owens Playa. The first test area has six monitors and has been running successfully for almost a year. Collected data is being analyzed and if proven reliable, further installation will take place. Staff has also started looking into covering our entire Owens Lake Sensit and air monitor network to collect data via WiFi instead of through our existing radio system. For FY 2020-2021, upgrades to the communication and camera networks will continue. As the network communication improves, the opportunity to collect data via WiFi throughout the Owens Playa will become an option. This type of communication is much quicker and puts a lot less stress on the data collection system. A small pilot project was started in December of 2019 and will continue to expand as network communications improve.

Staff continues to look into additional ways to monitor areas where substitution for traditional Sensit may be applicable. These include Tillage with BACM Backup (TwB2), BACM Shallow Flooding areas wetted with sprinklers, certain areas of BACM Managed Vegetation, and specific areas previously ordered for dust control but in a state of monitoring and avoidance due to sensitive resources. As mentioned above, the first test of small air sensors used in an upwind downwind configuration was recently installed. Staff will continue with this study in FY 2020-2021. If results are encouraging, the small air sensor network may be expanded to other areas of interest.

Science and Research Division

The Science and Research Division conducts and supports the technical and scientific work being completed in association with Owens Lake and Mono Lake for the SB270 Program. The work completed by the Science and Research Division is completed as part of work duties by multiple District staff members including the Senior Scientist, Deputy Air Pollution Control Officer, Director of Technical Services, Technical Services Technicians, Air Quality Technicians, Research System Analysts, and other District staff. The main work tasks are given and described below.

Work Tasks Underway

1. Dust control compliance, enforcement, and monitoring of Owens Lake dust controls: The dust control project implemented on Owens Lake by LADWP covers over 48 square miles of the lakebed. The project consists of a mosaic of three BACM dust control measures: Shallow Flooding, Managed Vegetation, and Gravel Blanket. Each of these BACM have specific performance criteria, as specified in Board Order #160413-01, that must be met to ensure that there are no dust emissions from the control areas that cause or contribute to exceedances of the PM10 Federal standard at the 3,600-foot elevation regulatory shoreline or the California State PM10 standard in the local communities. As much as possible, due to the large extent of the dust control areas, the required performance criteria are evaluated using remote sensing methods. The District conducts

many of the routine compliance evaluations in-house using methods developed by experts in remote sensing. The current remote sensing expert working with the District is from the Desert Research Institute (DRI) in Reno, Nevada and works on technical issues of the compliance methodology and in developing new and more efficient ways to conduct the compliance evaluations.

BACM Shallow Flooding and BACM Managed Vegetation areas are monitored regularly to determine if they meet the minimum performance criteria. Shallow Flooding areas are required to have a minimum wetness cover throughout the dust year which is checked regularly (every 5 to 8 days when conditions are clear) using the results of analysis from either Sentinel 2 or LandSat imagery. Managed Vegetation areas are assessed annually, at the end of the growing season in the fall, to determine if they have the required minimum level of ground cover and spatial distribution of plants. The method for evaluating the vegetation cover uses satellite imagery combined with field data collection.

Shallow Flooding has two variations that allow the LADWP to save water. The first of these variations is TwB2 that allows the surface to have large-scale tillage ridges present in place of water. The second variation is Brine with BACM Backup (Brine) that allows an area to be covered with a mix of water and specific types and thicknesses of salt crust. Should the TwB2 and Brine areas deteriorate such that they become potentially emissive, they are required to either be re-flooded or have maintenance activities performed. The order for re-flooding or maintenance work depends on the conditions present and how far they have deteriorated from the required compliance criteria. Both the TwB2 and Brine evaluations require analysis of remotely sensed imagery combined with field inspection of the conditions present on the ground. DRI assists the District in these evaluations, especially in the Brine work and required field inspections.

2. Participation in Habitat and Groundwater Workgroups for Owens Lake Master Project:

The LADWP is in the process of developing a Master Project for Owens Lake. The development of the Master Project is being led by the LADWP to balance the requirements for dust control with a reduction in water use from the aqueduct, maintaining habitat value, protection of cultural resources, and allowing for and promoting recreation and access on the lake. Water use reduction is being promoted through a combination of utilization of low-water or waterless dust controls and development of local water sources from groundwater within the Owens Lake area.

A draft Environmental Impact Report (EIR) is being prepared by the LADWP and is scheduled for release in the fall of 2020. Critical components of the EIR and project description are the development of Resource Protection Protocols (RPPs) for the

vegetated areas along the shorelands of the lake and for groundwater levels and chemistry in the surrounding area.

District staff have been involved with the Master Project (formerly called the Master Plan) since it first began in 2010 as part of the Coordinating/Advisory Committee and as members of the Habitat Workgroup and the Groundwater Workgroup. The Habitat Workgroup has been working on the development of a Habitat Suitability Model and developing the management tiers and thresholds to protect the habitat resources present.

The LADWP began the Owens Lake Groundwater Evaluation Program in 2009 to evaluate the groundwater resources in the Owens Lake basin with a focus on potential use for dust control operation. Once the Master Project planning began, the Groundwater Workgroup was formed with interested stakeholders interested in preventing impacts to the area from development of a groundwater source for dust controls.

RPPs have been developed by the LADWP for the Habitat and Groundwater Workgroups. Both RPPs are highly technical and complex documents. The District has worked with experts in remote sensing and hydrology in the review of these documents to ensure the protection of the local environmental resources. Of concern is the potential to create new dust sources on and around Owens Lake with groundwater pumping.

3. Patsiata Cultural Resource Task Force: The Cultural Resource Task Force (CRTF) was formed as part of the Settlement Agreement in 2013 with the LADWP. In 2019, the CRTF was renamed as the Patsiata Cultural Resource Task Force (PCRTF) to reflect the indigenous name for Owens Lake, Patsiata. The purpose of the PCRTF is to work with local tribes and other agencies to find ways to provide dust controls in areas with sensitive cultural resources. The PCRTF has worked with the Tribes on the recommendations for resources that were found in the Phase 7a and Phase 9/10 projects and were evaluated and determined as eligible for listing on the California Register of Historic Resources (the eligible areas are termed Phase 7b and Phase 9/10b areas, respectively). Upon Tribal recommendation and approval by the Great Basin Governing Board, dust controls are currently being avoided in the Phase 7b and Phase 9/10b eligible areas. During the avoidance period, the resource areas are being monitored by the District for dust emissions and surface activity and by the PCRTF monitoring subgroup for vegetation cover and human disturbance.

The Monitoring Committee of the PCRTF is working on designing a pilot dust control project in one of the avoidance areas. The project is being designed as a test of a low impact measure to provide some control of the area through irrigation to enhance existing vegetation and encourage natural recruitment of volunteers. Work is expected to begin in 2020 and continue through the 2020-2021 fiscal year.

As the dust control project on Owens Lake has increased in size over the ten (10) phases of work completed to date, the impact to cultural resources has become more of an issue with the local Tribes and other agencies. To recognize the importance of the resources in the Owens Lake area to the local Tribes and develop a comprehensive management plan, the District, the California State Lands Commission, the National Historic Preservation Office, the local Tribal Nations, the Bureau of Land Management (BLM), and the LADWP are working on a creation and nomination of the Owens Lake to the National Register of Historic Places. Work on the nomination and management plan are anticipated to continue through the 2020-2021 fiscal year.

4. Management and oversight of professional services contracts: The District contracts with several firms for professional consulting services associated with the SB270 program. The Science and Research Division directs, manages, and oversees the contracts for the following services.
 - Environmental consulting services (TEAM Engineering)
 - Archaeological consulting services in support of the Cultural Resource Task Force (TEAM Engineering)
 - Dust control compliance and enforcement - Remote sensing services (Desert Research Institute, DRI)
 - Dust control measure research (TEAM Engineering, DRI, analytical labs)
 - Hydrological evaluation services (Ramboll)
 - Owens Lake science and history (DRI)

Work Tasks for 2020-2021 and Beyond

In FY 2020-2021, the Science and Research Division will continue to work on the four tasks described above. The District will continue to conduct regular evaluations of the BACM Shallow Flooding and with the assistance of DRI, will conduct evaluations of the Brine BACM areas the BACM Managed Vegetation areas. The District will also perform regular evaluations of the TwB2 areas through review of sand flux and Light Detection and Ranging (LIDAR) data submitted by the LADWP and by conducting in-house Induced Particulate and Emission Test (IPET) and surface observation testing. It is expected that DRI will continue to work with and provide technical assistance to the District for all compliance related activities.

The District is concerned that the development of groundwater from under Owens Lake for use in the dust control areas will negatively impact environmental resources and create new and additional dust sources areas that will prevent the Owens Valley Planning Area from reaching attainment for PM10. During the 2020-2021 FY, the Science and Research Division will continue to participate in the Groundwater Working Group and Habitat Working Group of the Owens Lake Master Project and provide thorough technical review and comment on resource protection protocols and environmental analysis documents. Additionally, due to concerns about the number of continued exceedances on the Federal PM10 standard at Mono Lake and concerns that the lake level is not going to rise to submerge the exposed lake bed source areas, the Science

and Research Division along with Ramboll-Environ will be working with other agencies and interested parties on updating and refining the air quality model for the Mono Basin and lake level models in advance of a potential upcoming State Water Resource Control Board Hearing.

The Tribes completed their recommendations for the Phase 9/10b resource areas and submitted them to the LADWP and to the District in December 2017. The District Governing Board approved temporary avoidance and monitoring of these areas per the Tribal recommendation at the January 2018 meeting. The areas that were avoided as part of Phase 7b and Phase 9/10b will continue to be monitored by the District and the PCRTF Monitoring Subgroup. It is anticipated that the nomination process of the National Register Nomination will continue to progress over 2020-2021 with the development of a comprehensive management plan and preparation of the draft nomination package.

The Science and Research Division will continue to work on potential new alternative dust control measures. The Science and Research Division will be working with the PCRTF Monitoring Group on the design and implementation of a pilot project for providing low-impact dust control in one of the avoidance areas. Based on the report and recommendations from the Owens Lake Scientific Advisory Panel in April 2020, it is anticipated that there may be research started in the 2020-2021 fiscal year on alternative dust control measures for Owens Lake.

Data Systems and Technology Division

The Data Systems and Technology Division (DSTD) is tasked with data analysis and validation, compliance assessment, information services, and public outreach. It is comprised of one Senior Research and Systems Analyst and three Research and Systems Analyst IIs. Together, DSTD staff oversee several specific programs including the following:

Owens Lake and Mono Lake DustID Modeling support and oversight

Accomplishments: DustID has been a core task for DSTD for almost two decades and critical in determining the need for additional BACM dust control measures. It involves the generation and compilation of three components, 1) sand flux, 2) meteorological data, and 3) PM10 data. The flux data is generated by retrieving the Cox Sand Catch collection weights from Owens Lake and Mono Lake and time-resolving the sand mass with Sensit data. Recently, the DustID databases have been upgraded from several Microsoft Access databases into a consolidated Microsoft SQL database. In the next year, the computer which runs SQL will be upgraded to handle the increased computational demands. Meteorological and PM10 data are handled in our cloud-based database management system, AirVision. All these data are thoroughly QA/QCed before being provided to our modeling consultant, Ramboll Inc. Once the model has been run by Ramboll, DSTD staff processes and inspects the results to determine the quantity and frequency of PM10 emissions from the modeled source areas. These findings are used to determine if additional dust controls are required on Owens Lake. On Mono Lake, the model is used to assess the progress toward reaching attainment status in the Mono Basin PM10 Planning Area.

Goals: The District is obligated by the SIP to perform PM10 modeling annually, providing an assessment of the need for additional BACM controls by the end of each year. DSTD intends to continue annual modeling every year into the future. The cost for the modeling consultant in recent years has been \$250,000 and expected to be the same in 2020-2021. In addition to the DustID modeling, this cost covers the daily Owens Lake Yesterday modeling, which runs every morning and provides near-instantaneous PM10 emissions maps and animations.

Data validation for all monitored parameters

Accomplishments: This is also a core task for DSTD and receives much focus and staff time. The District has a very large network of air quality monitors, each collecting a variety of parameters, all of which need to be transmitted to a centralized data management system and validated in a three-level validation process. In 2016, the District recognized our data were outgrowing Microsoft Access database size limitations and could not continue to manage and validate the growing volume of data. After much research, the District chose Agilaire Inc to provide a cloud-based database management system called AirVision to replace the Access database.

Goals: In 2020-2021 the annual budget for the cloud based AirVision service is \$13,000. AirVision is a fully-fledged platform that is reliable, dependable, and used by many Air Quality management operations across the country. Since AirVision is cloud-based and Agilaire Inc is responsible for all technical upkeep, security, and maintenance, the District feels it's a very good value. DSTD is pleased with the efficiency AirVision has brought to the District and looks forward to its continued use.

EPA Air Quality System (AQS) updates, oversight, and certification

Accomplishments: One of the fundamental responsibilities of the District is reporting ambient air monitoring data to the Air Quality System (AQS) operated by the U.S. EPA. AQS is the repository that contains the air monitoring data of every air monitoring agency in the U.S. It is also the database that tracks the number federal exceedances of PM10 and other standards. The District monitors our AQS holdings carefully. Every quarter, after the District has performed all three levels of validation, the data are uploaded to the AQS database. AQS reports are then run to verify that the quarterly holdings are correct and accurate. Annually, on May 1, the District performs a thorough check of the AQS holding for the previous year and, once the District re-verifies their accuracy, certifies those holdings with the USEPA.

Goals: DSTD plans to continue its unwavering, excellent track record of timely and accurate AQS submission and annual certification. The cost to the District to load and manage AQS data is limited to staff time, annual AirVision subscription (detailed above), and attending biannual trainings.

Database management

Accomplishments: DSTD staff have developed several databases inhouse which are relied on extensively. One of the most critical is the Air Monitoring FileMaker database which allows District Air Monitoring Technicians to remotely document site maintenance information to a central server in real-time. By working with Air Monitoring staff to develop this tool, DSTD has streamlined and modernized maintenance records into a searchable, shared resource. A secondary benefit of this database is automatic data pre-invalidation, so that data affected by maintenance activities are flagged, preventing inadvertent air quality alerts. Another example of a DSTD-developed database uses FileMaker to facilitate the rapid update of website contents such as wildfire information and public notices. Now, the District website backend is entirely data-driven through FileMaker, AirVision, and DSTD custom coding.

Goals: DSTD plans to continue to implement strategic database tools to increase efficiency and productivity. In 2020-2021, DSTD plans a complete overhaul of the District's internal permitting system, allowing multiple user access and a map-driven interface. The annual budget for FileMaker database software is \$3,600 in 2020-2021.

Computer and technology provisioning and support

Accomplishments: The DSTD provides the District with the technical capabilities and information resources required to make the District as efficient, advanced, and nimble as possible. This involves too many items to list here. It includes 1) maintenance and management of three Synology Network File Servers which securely disseminate shared files among District staff in our Bishop and Keeler offices, 2) management and operation of secure multi-node WAN fiber and cellular connections from the Bishop office to remote air quality monitors, 3) a tech refresh program which regularly evaluates computing hardware requirements and provisions replacement resources, and 4) providing staff with the technical software required to perform at optimum efficiency.

Goals: DSTD plans to continue to provide the District the technical resources required to perform high-end modeling, GIS, analysis, and reporting, as well as support staff on a technical level on a daily basis. In 2020-2021, DSTD has budgeted for several technological components, including additional Synology hard drive expansion/replacements, tech updates, and essential software (Office, ESRI for GIS, ENVI for Image Processing, etc.).

Google Apps for Business administration

Accomplishments: In 2015, the District took the step to centralize our email and documents to the Google Apps for Business cloud-based collaboration platform. The transition was complex and involved, though well-planned and well-executed. District staff now enjoy much more efficiency via email correspondence with a searchable, familiar interface accessible both on desktops and mobile. In addition, staff are now able to collaborate and share documents with ease within the District and collaborators outside the District. The administration and oversight of Google Apps is straightforward and requires minimal effort.

Goals: DSTD recommends the continued subscription to Google Apps for Business. We have budgeted \$5,750, increased slightly from previous years.

BACM Compliance and GIS Administration

Accomplishments: DSTD is committed to delivering timely and accurate BACM compliance assessments. During Shallow Flood compliance season (Oct-June), an assessment is generated for every cloud-free Sentinel-2 satellite overpass (every 5 days). These assessments provide critical feedback, alerting LADWP managers and District staff to potential breakdowns, and identifying whether compliance thresholds are met or not. DSTD performs Managed Vegetation compliance calls on an annual basis, assessing whether BACM Managed Vegetation is compliant. Both compliance assessments rely heavily on our centrally managed GIS. Over the past few years, DSTD has organized a secure, centrally managed GIS repository. This GIS repository is administered by DSTD staff and accessible to all District employees. By having the repository centrally located, all GIS data used by staff in various projects are certain to reference the most current, up-to-date version.

Goals: DSTD plans to continue to provide the District timely and accurate compliance analyses and to administer a centrally managed GIS repository, adding and updating data as they become available. There is no additional impact to the budget other than staff time and the Synology servers and software which are budgeted for and discussed above.

Air Quality Advisories

Accomplishments: In 2014, with the intent of protecting public health, the District Governing Board adopted Rule 701 which establishes the District's Air Quality Advisory System. The Rule sets the PM concentration triggers for Stage 1 and Stage 2 PM Air Advisories for smoke and dust. This system is unique to the District – no other Air Monitoring Agency disseminates automated health alerts on an hourly basis. To accomplish this task, DSTD custom-coded those triggers into our AirVision data management system and has written extensive code to send community-specific alerts to concerned citizens, schools, and hospitals, both in Short Message Service (SMS) text and email. In addition, the alerts are automatically propagated to a prominent location on our website home page.

Goals: In 2020-2021, DSTD plans to continue to disseminate Air Advisories based on Rule 701 triggers. In addition, DSTD plan to streamline and improve the advisory system to allow for simpler sign-up and to speed up the time it takes the alerts to broadcast. As PM monitors are upgraded from PM10 to PM10/PM2.5, DSTD will accommodate the new parameters in AirVision and the alert system.

Web presence

Accomplishments: In 2017-2018, DSTD placed increased focus on expanding public outreach through the District website. We experienced a rapid growth in traffic and interest from the

public, particularly during periods of high-volume air quality advisories. DSTD realized the functionality of the District website was lacking and not able to easily communicate important information to citizens. The previous design was from 2010, prior to the widespread use of mobile devices. To address the issue, DSTD took it upon itself to develop a new mobile-friendly website, one that was scalable, attractive, easily navigated, and easy to update.

Goals: DSTD plans to manage the new website, keeping the content current and relevant. In addition, DSTD plans to upgrade the website background coding to current programming standards. In 2020-2021, DSTD has budgeted \$2,400 for a web hosting service.

Telephony system (VOIP)

Accomplishments: In 2016, the District land-line based phone system was getting very antiquated and expensive and did not provide standard features such as call forwarding and voicemail to email. DSTD evaluated available options and identified a VOIP system that would reduce District costs and provide many additional features. DSTD acquired and installed the system and the District is now realizing substantial cost savings. The management of the system is only required when an employee leaves or enters employment with the District, so is generally minimal.

Goals: DSTD plans to continue to manage the VOIP phone system for the District. DSTD has budgeted \$9,500 for 2020-2021, which includes service to both Keeler and Bishop offices.

Administrative Services Division

The Administrative Services Division serves as the support staff for the District and is comprised of three positions:

- Administrative Projects Manager (APM) duties include contract management, budgeting, general administrative functions, human resources, RFP & bid processes, surplus processes, grant compliance, maintenance coordination, risk management, safety and education training, administrative portions of air pollution control projects, coordination of audit and actuary, reporting to state agencies, FPPC compliance officer, and supervision of the Administrative Services division.
- Fiscal Services Technician duties include accounts payable, accounts receivable, payroll, employee benefit coordination, fiscal support services, financial reporting for audits and Governing Board, coordination and reconciliation of accounting between the District and the Treasury, vendor account management, budget monitoring, and backup to the Administrative Specialist.
- Administrative Specialist/Permit Coordinator/Clerk of the Board duties include examination and acceptance of documents as official records, preparation of agendas, minutes, and board packets including resolutions and board orders, maintenance of the master calendar and docket, liaison between Governing Board, Hearing Board, staff, and public, and coordination of public record request responses.

The Administrative Services Division has been busy in FY 2019-2020. In addition to the yearly routine tasks such as budget preparation, payroll, and accounting functions, staff has or is in the process of:

- Coordinated the responses to all public records act requests
- Processed all contracts and payments
- Coordinated the hiring and onboarding of four new employees
- Coordinated the retirement/separation and offboarding of four employees
- Implemented the second round of the very successful Woodsmoke Reduction Program, resulting in the issuance of 28 vouchers for new EPA-certified woodstoves and wood insert replacements.
- Update of the District's Purchasing Policy
- Revocation of Rule 1101
- Creation of the District's Lactation Policy
- Work toward the update of the District's Bylaws
- Continuation of efforts to digitize information for efficiency, ease of research, and storage concerns
- Clean up of the District's Capital Asset List
- Creation of a Capital Improvement Plan for the Bishop Office
- Successful fiscal year audit with no findings
- Implementation of new asset tracking system/software
- Continued regular surplus program, divesting of equipment no longer needed by District
- Achievement of the Risk Management Practitioner certification by the APM
- Onboarding of two new hearing board members
- Brought a trainer to Bishop to provide management training for staff
- Completion of the Risk Management Practitioner Certification

Looking forward to the new fiscal year, we have the following goals:

- Wrap up of any outstanding FY 2019-2020 projects that remain unfinished
- Digitizing variance files and creating a log similar to Board Order log
- Creation of an Emergency Action Plan for the Bishop office
- Create plan for deferred maintenance at the Bishop office and create a capital improvement plan
- Implement Clean Air Project Program
- Revamp budgeting process
- Completion of an update to the District's Policy and Procedure Manual, incorporating employee rules and board policies into a comprehensive, contemporary document
- Conversion to new accounting software
- Update to the District's Document Retention Policy
- Creation of a Cost Allocation Plan and a Fee Schedule analysis and potential update



CUSTOMERS FIRST

Eric Garcetti, Mayor

Board of Commissioners

Mel Levine, President

Cynthia McClain-Hill, Vice President

Jill Banks Barad

Nicole Neeman Brady

Susana Reyes

Susan A. Rodriguez, Secretary

Martin L. Adams, General Manager and Chief Engineer

February 18, 2020

Mr. Phillip Kiddoo
Air Pollution Control Officer
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, California 93514-3537

Subject: Review of 2020-2021 Fiscal Year Budget and SB270 Fee Assessment

Dear Mr. Kiddoo:

Thank you for the opportunity to review and provide comments on the Great Basin Unified Air Pollution Control District's (GBUAPCD) 2020-2021 Fiscal Year Budget and SB270 Fee Assessment, draft dated February 4, 2020. Los Angeles Department of Water and Power's (LADWP) comments are enclosed, and submitted for consideration ahead of the public hearing by GBUAPCD District Governing Board scheduled for Thursday, March 5, 2020.

If you have any questions, please contact me at (213) 367-1138.

Sincerely,

Nelson O. Mejia
Manager of Owens Lake Dust Mitigation Program

LC:slr

Great Basin Unified Air Pollution Control District 2020-2021 Draft Budget Review

Los Angeles Department of Water and Power Comments

1. Mono Lake
 - a. Los Angeles Department of Water and Power (LADWP) requests that the Great Basin Unified Air Pollution Control District (GBUAPCD) separate budget items for Owens Lake and Mono Lake.
 - b. LADWP requests that costs associated with lake level monitoring activities at Mono Lake not be included in the SB270 assessment. LADWP believes that the work done by GBUAPCD's Science and Research Division along with Ramboll-Environ is outside of Section 42316 of the California Health and Safety Code.
2. LADWP requests that clarification regarding GBUAPCD's Reserve Fund Policy be included in the 2020-2021 budget.
 - a. LADWP is under the impression that the general fund reserve is separate from the SB270 reserve funds and requests a statement be included clearly asserting that to be the case. If there is a connection between the two reserve funds, that should be discussed as well.
 - b. It is not clear which surpluses from the 2019-2020 budget contributed to the 2020-2021 Reserve Fund. LADWP requests budget actuals from 2019-2020 be included in order to show which line items reserve funds came from.
3. LADWP requests a projection of the General Fund revenue if per capita fees were not waived.
4. LADWP requests budget actuals for the last 5 years associated with Table 7 (SB270) of the 2020-2021 budget.



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 www.gbuapcd.org

February 24, 2020

Mr. Nelson O. Mejia
Manager of Owens Lake Dust Mitigation Program
Los Angeles Department of Water and Power
111 N. Hope Street
Los Angeles, CA 90012-2607

Dear Mr. Mejia:

The Great Basin Unified Air Pollution Control District (District or GBUAPCD) has received the comments provided by the City of Los Angeles Department of Water and Power (City or LADWP), dated February 18, 2020, regarding the 2020-2021 Fiscal Year Budget and SB270 Fee Assessment Draft, dated February 4, 2020. The City's comments have been included in the Governing Board packet for the Board members' review at their meeting on March 5, 2020. In advance of that meeting, the District offers the following responses to the issues (denoted by **bold font**) raised by City.

1. Mono Lake

- a. **Los Angeles Department of Water and Power (LADWP) requests that the Great Basin Unified Air Pollution Control District (GBUAPCD) separate budget items for Owens Lake and Mono Lake.**

The District's Mono Lake and Owens Lake programs operate together entirely under our SB270 Budget. The District does not distinguish or track costs separately as they all fall under provisions of California Health and Safety Code Section 42316 (SB 270) whereby the City is required to undertake reasonable measures, including studies, to mitigate the air quality impacts of its activities in the production, diversion, storage, or conveyance of water and required to pay, on an annual basis, reasonable fees, based on an estimate of the actual costs to the District of its activities associated with the development of the mitigation measures and related air quality analysis with respect to those activities of the City.

- b. **LADWP requests that costs associated with lake level monitoring activities at Mono Lake not be included in the SB270 assessment. LADWP believes the work done by GBUAPCD's Science and Research Division along with Ramboll Environ is outside of Section 42316 of the California Health and Safety Code.**

See Response to No. 1.a above. The work by the District Science and Research Division and Ramboll is within the category of reasonable measures, including studies, provided for under California Health and Safety Code Section 42316.

2. LADWP requests that clarification regarding GBUAPCD's Reserve Fund Policy be included in the 2020-2021 budget.

The District Governing Board approved an updated Reserve Policy on May 11, 2017 (see attached). As stated in the policy, the Board has set the Reserve amount at 33.3% of full annual operating costs.

- a. LADWP is under the impression that general fund reserve is separate from the SB270 reserve funds and requests a statement be included clearly asserting that to be the case. If there is a connection between the two reserve funds, that should be discussed as well.**

The City's impression that the General Fund Reserve is separate from the SB270 Fund Reserve is correct. Both funds reside in separate accounts at the Inyo County Treasury and are accounted for separately not only at the Inyo County Treasury, but also in the District's own accounting system, budget documents, and reports, and both funds are reconciled quarterly and reported to the Governing Board.

Of note, after approval by the Governing Board of the final yearly budget and after the start of the new fiscal year, the appropriated funds are transferred to separate operating accounts, also housed in the Inyo County Treasury, and those accounts are reconciled internally monthly. At the close of the fiscal year, unused and unencumbered funds remaining in the operating accounts are returned to their respective reserve accounts. Thus, the Reserve Funds normally have only two transactions each per fiscal year – appropriation to operating, and return from operating of unused and unencumbered funds, unless the Governing Board makes additional appropriations.

- b. It is not clear which surpluses from the 2019-2020 budget contributed to the 2020-2021 Reserve Fund. LADWP requests budget actuals from 2019-2020 be included in order to show which line items reserve funds came from.**

The Reserve Funds are an accumulation of transactions – both positive and negative – over many years. No surplus, or deficit, has yet occurred for fiscal year 2019-2020 to contribute to or withdraw from the Reserves, as fiscal year 2019-2020 has yet to conclude. The most recent quarterly report showing actual expenditures from fiscal year 2020-2021 is included in the March 5, 2020 Board packet under item 7.a. *"FY2019-2020 2nd Quarter Financial Reports (Oct31-Dec 31)"*. Here, you will also see the quarterly reconciliation of the Reserves and the operating account ("Spendable Cash") at the bottom of the SB270 worksheet.

Functionally, due to the requirement that the upcoming fiscal year's budget adoption is well before the closing of the current fiscal year and the two transfers to/from the Reserves from the operating account, any unspent or unencumbered funds will not be credited to the Reserve until after the Assessment has been made, but will be taken into account in the following fiscal year's Reserve threshold, budgeting, and Assessment.

3. LADWP requests a projection of the General Fund revenue if per capita fees were not waived.

The per capita fees contemplated to be waived for Fiscal Year 2020-2021 total \$18,337. This waiver will be on the Governing Board's March 5, 2020 agenda for action as item 6.b. "*Waiver of District Rule 1102 Annual \$0.55 Per Capita Town and Counties Assessment Fees for Fiscal Year 2020-2021*". The Governing Board historically waives these fees when the General Fund Reserve is above the 33.3% threshold as stated in the attached Reserve Policy.

Should the Governing Board choose not to waive Per Capita Fees, you have correctly noted that those fees would be General Fund, not SB270, revenues. The SB270 Assessment remains unaffected regardless of the Governing Board's decision regarding Per Capita Fees.

4. LADWP requests budget actuals for the last 5 years associated with Table 7 (SB270) of the 2020-2021 budget.

The District does not have a table with budget actuals for the last five years in the same format as Table 7. Please find attached the 4th Quarter Financial Reports for Fiscal Years 2014-2015, 2015-2016, 2016-2017, 2017-2018, and 2018-2019. These 4th Quarter Reports are presented to the Governing Board on a yearly basis, generally at the September or November Governing Board meeting, once the yearly Independent Audit fieldwork is concluded.

Please contact me or Susan Cash, Administrative Projects Manager, if you have any questions regarding the District's response.

Sincerely,



Phillip L. Kiddoo
Air Pollution Control Officer

Attachments

Cc (via email):

Arrash Agahi, Los Angeles Department of Water and Power
Susan Cash, Great Basin Unified Air Pollution Control District



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537
760-872-8211 Fax: 760-872-6109

RESERVE FUND POLICY

Purpose – In order to meet its health and safety, as well as its fiduciary responsibilities to the public, the District will strive to maintain sufficient financial reserves in both the regular District and SB 270 accounts to ensure it has the ability to carry out its mission to protect the people and environment of Alpine, Mono and Inyo Counties from the harmful effects of air pollution. Reserve funds shall be used to provide resources for unpredicted or unbudgeted expenditure needs.

Allocation – The District Governing Board has the sole discretion and authority to allocate reserve funds. Reserve fund commitments shall be made by at least a five-sevenths (5/7) vote of the District Governing Board.

Fund amounts – The District will strive to maintain reserve fund amounts of thirty-three and one-third percent (33.3%) of full annual operating costs.

Action to be taken if actual reserve maximums are exceeded:

- **For the District account**, if the reserve maximums specified above are exceeded by comparing the actual reserve amount with the adopted final District budget in May/June of each year, then any automatic Consumer Price Index (CPI) increase for District permit fees will not take place for the upcoming fiscal year. This calculation will be made on an annual basis and formal action will be taken by the Governing Board to waive the automatic CPI increase. Fee decreases caused by negative CPIs will be allowed to go into effect.
- **For the SB 270 account**, if reserve maximums specified above are exceeded by comparing the actual reserve amount with the adopted final District budget in May/June of each year, then the SB 270 fee for the upcoming fiscal year will be reduced by the amount of the exceedance and that amount will be transferred from the reserve fund to the SB 270 operating budget.

The Governing Board reserves the right to modify this policy at any time.

Adopted by Governing Board May 11, 2017

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2014-2015
For the 4th Quarter (Ending June 30, 2015)

EXPENSES	4th Quarter	Budget	Adjusted Budget	% of Budget
I Employee Costs				
A Employee Wages	1,436,222.48	1,495,000.00	1,495,000.00	96.07%
B Retirement	415,047.15	400,000.00	400,000.00	103.76%
CalPERS Retirement Side Fund Payment (B/O 150316-06)	596,034.00	-	596,034.00	100.00%
C Insurance Benefits	297,735.86	310,000.00	310,000.00	96.04%
D Payroll Taxes	250,501.92	270,000.00	270,000.00	92.78%
E Retiree Medical Insurance Unfunded Liability	-	-	-	-
F Worker's Compensation Insurance	15,573.02	20,000.00	20,000.00	77.87%
Employee Costs	3,011,114.43	2,495,000.00	3,091,034.00	97.41%
II Operating & Compliance Costs				
A Advertising - Legal Notices & Ads	3,450.89	4,000.00	4,000.00	86.27%
B Dues, Subscriptions, Education, Use Tax & Fees	24,735.19	26,000.00	26,000.00	95.14%
C Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea.)	136,491.73	120,500.00	120,500.00	113.27%
D Fuel and Gasoline	27,169.63	31,000.00	31,000.00	87.64%
E Health & Safety	1,986.99	4,000.00	4,000.00	49.67%
F Insurance - Liability, Fire & Casualty	48,648.09	46,000.00	46,000.00	105.76%
G Leases & Rents: Equipment, Office, Site, Storage	103,057.54	106,000.00	106,000.00	97.22%
H Maintenance & Repairs of Equipment - Labor	25,087.85	41,000.00	41,000.00	61.19%
I Maintenance & Repairs of Equipment - Materials	73,423.92	97,000.00	97,000.00	75.69%
J Postage and Shipping	2,641.62	4,000.00	4,000.00	66.04%
K Professional & Special Services*	1,039,594.09	1,816,500.00	1,487,066.00	69.91%
L Supplies and Tools (In-field, Office, General Use)	35,979.93	30,000.00	30,000.00	119.93%
M Transportation & Travel	26,520.36	18,000.00	18,000.00	147.34%
N Utilities	55,448.76	61,000.00	61,000.00	90.90%
O Project Demonstration: Control Measure Testing	142,024.97	300,000.00	429,100.00	33.10%
P Monitor Site Relocation	54,779.61	-	134,900.00	40.61%
Operating & Compliance	1,801,041.17	2,705,000.00	2,639,566.00	68.23%
*Includes Special Legal Fee Assessment				
III Materials and Equipment				
A Equipment: Computer, Furniture, General, Office, Scientific, Software (>\$5,000 ea.)	-	-	-	-
B Vehicles & ATVs	-	-	-	-
Materials & Equipment	-	-	-	-
Total Expenses	\$ 4,812,155.60	\$ 5,200,000.00	\$ 5,730,600.00	83.97%

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2014-2015
For the 4th Quarter (Ending June 30, 2015)

REVENUE	4th Quarter	Budget	Adjusted Budget	% of Budget
I Fees, Permits & Penalties	4,000,000.00	4,000,000.00	4,000,000.00	100.00%
Special Legal Fee Assessment	711,768.00	711,768.00	711,768.00	100.00%
Reserve Policy Adjustment	488,232.00	488,232.00	488,232.00	100.00%
Fees, Permits & Penalties	5,200,000.00	5,200,000.00	5,200,000.00	100.00%
II Other Revenue				
Interest	7,958.80	-	-	-
FY13-14 Carry-overs	-	-	530,600.00	-
Sale of Assets	12,014.00	-	-	-
PM2.5 from District (Reimburse staff time)	18,297.87	-	-	-
Sales, Services, Rebates, Refunds	3,693.21	-	-	-
	<u>41,963.88</u>	-	<u>530,600.00</u>	-
TOTAL REVENUE	\$ 5,241,963.88	\$ 5,200,000.00	\$ 5,730,600.00	100.81%

Reconcile to Inyo County Treasury as of 6/30/2015

SB 270 General Fund Reserves	\$ 1,360,736.87
Capital Asset Accrual Reserves	\$ 358,799.65
Accrued Payables	\$ 232,292.05
Carry overs	\$ 405,500.00
Spendable/Available Cash	\$ 571,532.84
	<u><u>\$ 2,928,861.41</u></u>

Balance, IC Auditor Report 6/30/2015 \$ 2,928,861.41

Checking account balance as of 6/30/2015=\$1,184.33
Interest transferred to PARS Retiree Health: \$11,100.05

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2015-2016
For the 4th Quarter (Ending June 30, 2016)

EXPENSES		4th Quarter	Budget	Adjusted Budget	% of Budget
I	Employee Costs				
A	Employee Wages	1,517,479.67	1,636,000.00	1,636,000.00	92.76%
B	Retirement	347,926.93	434,000.00	434,000.00	80.17%
C	Insurance Benefits	346,211.25	351,000.00	351,000.00	98.64%
D	Taxes	266,817.44	286,000.00	286,000.00	93.29%
E	Retiree Medical Insurance Unfunded Liability	-	-	-	-
F	Worker's Compensation Insurance	15,755.90	16,000.00	16,000.00	98.47%
G	Unfunded Pension Liabilities (B/O 160201-04) Resolution No.2016-01	1,146,528.00	-	1,146,528.00	100.00%
	Employee Costs	3,640,719.19	2,723,000.00	3,869,528.00	94.09%
II	Operating & Compliance				
A	Advertising - Legal Notices & Ads	12,718.67	5,000.00	5,000.00	254.37%
B	Dues, Subscriptions, Education, Use Tax & Fees	39,601.95	26,000.00	26,000.00	152.32%
C	Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea.)	129,912.00	125,500.00	125,500.00	103.52%
D	Fuel and Gasoline	26,982.13	31,000.00	31,000.00	87.04%
E	Health & Safety	489.89	4,000.00	4,000.00	12.25%
F	Insurance - Liability, Fire & Casualty	40,719.22	46,000.00	46,000.00	88.52%
G	Leases & Rents: Equipment, Office, Site, Storage	106,152.20	110,000.00	110,000.00	96.50%
H	Maintenance & Repairs of Equipment - Labor	37,938.52	34,000.00	34,000.00	111.58%
I	Maintenance & Repairs of Equipment - Materials	95,991.25	95,000.00	95,000.00	101.04%
J	Postage and Shipping	2,956.29	4,000.00	4,000.00	73.91%
K	Professional & Special Services	717,185.22	750,500.00	894,000.00	80.22%
L	Supplies and Tools (In-field, Office, General Use)	29,033.63	30,000.00	30,000.00	96.78%
M	Transportation & Travel	27,115.42	18,000.00	18,000.00	150.64%
N	Utilities	49,231.68	61,000.00	61,000.00	80.71%
O	Project Demonstration: Control Measure Testing	386,271.82	100,000.00	387,000.00	99.81%
	Operating & Compliance Costs	1,702,299.89	1,440,000.00	1,870,500.00	91.01%
III	Materials & Equipment				
A	Equipment: Computer, Furniture, General, Office, Scientific, Software (>\$5,000 ea.)	100,483.85	24,000.00	100,483.85	100.00%
B	Vehicles & ATVs	33,351.82	-	-	-
	Materials & Equipment Costs	100,483.85	24,000.00	100,483.85	100.00%
	Expenses Total (Parts I, II, III)	\$ 5,476,854.75	\$ 4,187,000.00	\$ 5,873,863.67	93.24%
IV	A Special Legal Fee	\$ 592,169.03	\$ 800,000.00	\$ 775,000.00	76.41%
V	A Owens Lake Scientific Advisory Panel	\$ 750,000.00	\$ 750,000.00	\$ 750,000.00	100.00%
		\$ 1,342,169.03	\$ 1,550,000.00	\$ 1,525,000.00	88.01%
	Expenses Total (Parts I - V)	\$ 6,819,023.78	\$ 5,737,000.00	\$ 7,398,863.67	92.16%

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2015-2016
For the 4th Quarter (Ending June 30, 2016)

REVENUE		4th Quarter	Budget	Adjusted Budget	% of Budget
I	Fees, Permits & Penalties	\$ 4,187,000.00	\$ 4,187,000.00	\$ 4,187,000.00	100.00%
	Legal Fee Assessment	\$ 586,663.00	\$ 586,663.00	\$ 586,663.00	100.00%
	Reserve Policy Adjustment	\$ 213,337.00	\$ 213,337.00	\$ 213,337.00	100.00%
	Owens Lake Scientific Advisory Panel	\$ 750,000.00	\$ 750,000.00	\$ 750,000.00	100.00%
	Fees, Permits & Penalties	\$ 5,737,000.00	\$ 5,737,000.00	\$ 5,737,000.00	100.00%
II	Other Revenue				
	FY14-15 Carry-overs	405,500.00	-	405,500.00	-
	Interest	18,611.89	-	-	-
	Sales, Services, Rebates, Refunds	17,230.92	-	-	-
	From Capital Asset Reserve: Equipment & Materials	19,017.16	-	19,017.16	100.00%
	From Capital Asset Reserve: Equipment (B.O.160201-03c, 160201-03d)	57,466.69	-	57,466.69	100.00%
	From Reserves: Unfunded Pension Liabilities (B/O 160201-04) Resolution No.2016-01	1,146,528.00	-	1,146,528.00	100.00%
		1,679,334.92	-	1,628,511.85	103.12%
	TOTAL REVENUE	\$ 7,416,334.92	\$ 5,737,000.00	\$ 7,365,511.85	129.27%

Reconcile to Inyo County Treasury as of 6/30/2016

SB 270 General Fund Reserves	\$ 572,404.71
Capital Asset Accrual Reserves	\$ 272,555.35
Spendable/Available Cash	\$ 599,063.51
Move OLSAP funds to FY16-17	\$ 750,000.00
Accrued Payables	\$ 157,412.56
Carry overs	\$ 214,000.00
	\$ 2,565,436.13

Balance: Inyo County Auditor Report 6/30/2016 **\$ 2,565,436.13**

Checking account balance as of 6/30/2016=\$35,911.74

Interest transferred to PARS Retiree Health: \$24,535.38

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2016-2017
For the 4th Quarter (Ending June 30, 2017)

EXPENSES		4th Quarter	Budget	Adjusted Budget	% of Budget
I	Employee Costs				
A	Employee Wages	1,555,756.21	1,678,000.00	1,678,000.00	92.71%
B	Retirement	377,144.69	378,000.00	378,000.00	99.77%
C	Insurance Benefits	413,433.62	394,000.00	394,000.00	104.93%
D	Taxes	270,383.44	287,000.00	287,000.00	94.21%
E	Retiree Medical Insurance Unfunded Liability	-	-	-	-
F	Worker's Compensation Insurance	16,904.33	17,000.00	17,000.00	99.44%
	Employee Costs	2,633,622.29	2,754,000.00	2,754,000.00	95.63%
II	Operating & Compliance				
A	Advertising - Legal Notices & Ads	6,409.74	5,000.00	5,000.00	128.19%
B	Dues, Subscriptions, Education, Use Tax & Fees	32,469.79	26,000.00	26,000.00	124.88%
C	Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea.)	81,361.39	95,500.00	95,500.00	85.20%
D	Fuel and Gasoline	23,923.48	31,000.00	31,000.00	77.17%
E	Health & Safety	392.15	4,000.00	4,000.00	9.80%
F	Insurance - Liability, Fire & Casualty	42,034.80	46,000.00	46,000.00	91.38%
G	Leases & Rents: Equipment, Office, Site, Storage	108,518.52	111,000.00	111,000.00	97.76%
H	Maintenance & Repairs of Equipment - Labor	34,221.43	35,000.00	35,000.00	97.78%
I	Maintenance & Repairs of Equipment - Materials	137,183.12	135,000.00	135,000.00	101.62%
J	Postage and Shipping	2,198.40	4,000.00	4,000.00	54.96%
K	Professional & Special Services	550,328.04	700,500.00	700,500.00	78.56%
L	Supplies and Tools (In-field, Office, General Use)	24,963.56	30,000.00	30,000.00	83.21%
M	Transportation & Travel	27,212.32	18,000.00	18,000.00	151.18%
N	Utilities	57,230.06	61,000.00	61,000.00	93.82%
O	Project Demonstration: Control Measure Testing	140,958.94	100,000.00	314,000.00	44.89%
	Operating & Compliance Costs	1,269,405.74	1,402,000.00	1,616,000.00	78.55%
III	Materials & Equipment				
A	Equipment: Computer, Furniture, General, Office, Scientific, Software (>\$5,000 ea.)	131,733.04	115,000.00	115,000.00	114.55%
B	Vehicles & ATVs	35,117.39	35,000.00	35,000.00	100.34%
	Materials & Equipment Costs	166,850.43	150,000.00	150,000.00	111.23%
	Expenses Total (Parts I, II, III)	\$ 4,069,878.46	\$ 4,306,000.00	\$ 4,520,000.00	90.04%
IV	A Special Legal Fee	\$ 90,775.49	\$ 400,000.00	\$ 400,000.00	22.69%
V	A Owens Lake Scientific Advisory Panel	\$ -	\$ -	\$ 750,000.00	0.00%
		\$ 90,775.49	\$ 400,000.00	\$ 1,150,000.00	7.89%
	Expenses Total (Parts I - V)	\$ 4,160,653.95	\$ 4,706,000.00	\$ 5,670,000.00	73.38%

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2016-2017
For the 4th Quarter (Ending June 30, 2017)

REVENUE		4th Quarter	Budget	Adjusted Budget	% of Budget
I	Fees, Permits & Penalties	\$ 4,306,000.00	\$ 4,306,000.00	\$ 4,306,000.00	100.00%
	Legal Fee Assessment	\$ 400,000.00	\$ 400,000.00	\$ 400,000.00	100.00%
	Fees, Permits & Penalties	\$ 4,706,000.00	\$ 4,706,000.00	\$ 4,706,000.00	100.00%
II	Other Revenue				
	FY15-16 Carry-overs	214,000.00	-	214,000.00	100.00%
	Carry-over: Owens Lake Scientific Advisory Panel	750,000.00	-	750,000.00	100.00%
	From Asset Reserve: BO#160516-05e/2Data Loggers	41,990.00	-	-	-
	Interest	32,904.36	-	-	-
	PM2.5 from District (Reimburse staff time)	14,614.44	-	-	-
	Sale of Assets	12,045.01	-	-	-
	Sales, Services, Rebates, Refunds	10,611.92	-	-	-
		<u>1,076,165.73</u>	<u>-</u>	<u>964,000.00</u>	<u>111.64%</u>
	TOTAL REVENUE	\$ 5,782,165.73	\$ 4,706,000.00	\$ 5,670,000.00	101.98%

Reconcile to Inyo County Treasury as of 6/30/2017

SB 270 General Fund Reserves	\$ 1,171,481.51
Capital Asset Accrual Reserves	\$ 202,537.82
Spendable/Available Cash	\$ 570,899.87
Funds to pay Pre-2013 UAL (In FY17-18)	\$ 200,000.00
Move OLSAP Funds to FY 2017-2018	\$ 750,000.00
Accrued Payables	\$ 251,487.90
Carry overs	\$ 113,273.00
Deferred FY 2017-2018 Fee Assessment	\$ 4,859,118.00
	<u>\$ 8,118,798.10</u>

Balance: IC Auditor's Report as of 6/30/2017 **\$ 8,118,798.10**

Checking account balance as of 6/30/2017=\$38,265.49
Interest transferred to PARS Retiree Health: \$41,539.41

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2017-2018
For the 4th Quarter (Ending June 30, 2018)

EXPENSES	4th Quarter	Budget	Adjusted Budget	% of Budget
I Employee Costs				
A Employee Wages	1,587,723.63	1,692,800.00	1,692,800.00	93.79%
B Retirement	399,248.09	424,500.00	424,500.00	94.05%
C Insurance Benefits	423,969.82	449,700.00	449,700.00	94.28%
D Taxes	280,802.25	285,500.00	285,500.00	98.35%
E Worker's Compensation Insurance	16,106.60	16,500.00	16,500.00	97.62%
F Retirement: CalPERS Unfunded Accrued Liability Payment	200,000.00	-	200,000.00	-
Employee Costs	2,907,850.39	2,869,000.00	3,069,000.00	94.75%
II Operating & Compliance				
A Advertising - Legal Notices & Ads	4,691.65	6,000.00	6,000.00	78.19%
B Dues, Subscriptions, Education, Use Tax & Fees	30,465.47	40,000.00	40,000.00	76.16%
C Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea.)	93,534.40	143,100.00	143,100.00	65.36%
D Fuel and Gasoline	26,361.31	30,000.00	30,000.00	87.87%
E Health & Safety	175.83	2,000.00	2,000.00	8.79%
F Insurance - Liability, Fire & Casualty	50,618.66	45,000.00	45,000.00	112.49%
G Leases & Rents: Equipment, Office, Site, Storage	111,203.15	113,800.00	113,800.00	97.72%
H Maintenance & Repairs of Equipment - Labor	32,879.10	50,000.00	50,000.00	65.76%
I Maintenance & Repairs of Equipment - Materials	136,105.71	151,000.00	151,000.00	90.14%
J Postage and Shipping	1,673.93	3,000.00	3,000.00	55.80%
K Professional & Special Services	863,242.12	1,188,300.00	1,249,540.00	69.08%
L Supplies and Tools (In-field, Office, General Use)	26,919.72	35,000.00	35,000.00	76.91%
M Transportation & Travel	22,026.60	28,000.00	28,000.00	78.67%
N Utilities	48,410.31	70,300.00	70,300.00	68.86%
O Project Demonstration: Control Measure Testing	52,033.00	-	52,033.00	100.00%
P Public Outreach & Education	8,879.62	10,000.00	10,000.00	88.80%
Operating & Compliance Costs	1,509,220.58	1,915,500.00	2,028,773.00	74.39%
III Materials & Equipment				
A Equipment: Computer, Furniture, General, Office, Scientific, Software (>\$5,000 ea.)	191,000.00	191,000.00	191,000.00	100.00%
From Capital Asset Reserve	101,028.33	-	101,028.33	-
B Vehicles & ATVs	36,190.12	50,000.00	50,000.00	72.38%
Materials & Equipment Costs	328,218.45	241,000.00	342,028.33	95.96%
Expenses Total (Parts I, II, III)	\$ 4,745,289.42	\$ 5,025,500.00	\$ 5,439,801.33	87.23%
IV Owens Lake Scientific Advisory Panel				
A 2014 Stipulated Judgment (Paragraph 12.G)	\$ 750,000.00	\$ -	\$ 750,000.00	-
FY 2017-2018 SB 270 Fee	\$ 5,495,289.42	\$ 5,025,500.00	\$ 6,189,801.33	88.78%

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2017-2018
For the 4th Quarter (Ending June 30, 2018)

REVENUE		4th Quarter	Budget	Adjusted Budget	% of Budget
I	Fees, Permits & Penalties	\$ 4,859,118.00	\$ 4,859,118.00	\$ 4,859,118.00	100.00%
	Reserve Policy Credit	\$ 166,382.00	\$ 166,382.00	\$ 166,382.00	100.00%
	Total SB 270 Fee Assessment	\$ 5,025,500.00	\$ 5,025,500.00	\$ 5,025,500.00	100.00%
II	Other Revenue				
	FY16-17 Carry-overs	161,639.84	-	161,639.84	-
	FY16-17 Carry-over: CalPERS Unfunded Accrued Liability	200,000.00	-	200,000.00	-
	Carry-over: Owens Lake Scientific Advisory Panel	750,000.00	-	750,000.00	-
	From Asset Reserve:	52,661.49	-	52,661.49	-
	Interest	51,142.71	-	-	-
	PM2.5 from District (Reimburse expense)	18,245.00	-	-	-
	Sales, Services, Rebates, Refunds	3,188.99	-	-	-
		1,236,878.03	-	1,164,301.33	106.23%
	TOTAL REVENUE	\$ 6,262,378.03	\$ 5,025,500.00	\$ 6,189,801.33	101.17%

Reconcile to Inyo County Treasury as of 6/30/2018

SB 270 General Fund Reserves	\$ 1,575,999.38
Capital Asset Accrual Reserves	\$ 181,554.30
Spendable/Available Cash	\$ 689,064.72
Move OLSAP Funds to FY 2018-2019	\$ 750,000.00
Accrued Payables	\$ 399,736.30
Carry Overs	\$ 132,725.00
Deferred FY 2018-2019 Fee Assessment	\$ 5,118,500.00
	\$ 8,847,579.70

Balance, IC Auditor Report 6/30/2018 **\$ 8,847,579.70**

Checking account balance as of 6/30/2018=\$6,095.26

Interest transferred to PARS Trust = \$64,728.71

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2018-2019
For the 4th Quarter (Ending June 30, 2019)

EXPENSES	4th Quarter	Budget	Adjusted Budget	% of Budget
I Employee Costs				
A Employee Wages	1,692,479.16	1,715,500.00	1,715,500.00	98.66%
B Retirement	343,253.37	337,000.00	337,000.00	101.86%
C Insurance Benefits	491,293.96	397,000.00	397,000.00	123.75%
D Taxes	300,964.82	301,500.00	301,500.00	99.82%
E Worker's Compensation Insurance	16,615.96	13,500.00	13,500.00	123.08%
Employee Costs	2,844,607.27	2,764,500.00	2,764,500.00	102.90%
II Operating & Compliance				
A Advertising - Legal Notices & Ads	3,492.07	4,500.00	4,500.00	77.60%
B Dues, Subscriptions, Education, Use Tax & Fees	37,351.64	33,000.00	33,000.00	113.19%
C Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea.)	90,627.49	112,000.00	112,000.00	80.92%
D Fuel and Gasoline	31,126.69	25,000.00	25,000.00	124.51%
E Health & Safety	2,896.55	5,000.00	5,000.00	57.93%
F Insurance - Liability, Fire & Casualty	54,158.11	52,000.00	52,000.00	104.15%
G Leases & Rents: Equipment, Office, Site, Storage	98,599.07	112,000.00	112,000.00	88.03%
H Maintenance & Repairs of Equipment - Labor	41,382.17	50,500.00	50,500.00	81.94%
I Maintenance & Repairs of Equipment - Materials	155,754.50	175,000.00	175,000.00	89.00%
J Postage and Shipping	2,348.80	2,000.00	2,000.00	117.44%
K Professional & Special Services	778,361.80	1,184,000.00	1,316,725.00	59.11%
L Supplies and Tools (In-field, Office, General Use)	27,360.83	22,500.00	22,500.00	121.60%
M Transportation & Travel	26,854.20	28,000.00	28,000.00	95.91%
N Utilities	57,410.32	67,500.00	67,500.00	85.05%
O Control Measure Testing	666.00	200,000.00	200,000.00	0.33%
P Public Outreach & Education	-	10,000.00	10,000.00	-
Operating & Compliance Costs	1,408,390.24	2,083,000.00	2,215,725.00	63.56%
III Materials & Equipment				
A Equipment: Computer, Furniture, General, Office, Scientific, Software (>\$5,000 ea.)	96,768.77	230,500.00	230,500.00	41.98%
B Vehicles & ATVs	30,953.02	40,500.00	40,500.00	76.43%
C Purchased 157 Short St., Bishop Building (BO#190307-06)	425,928.48	-	510,000.00	83.52%
Materials & Equipment Costs	553,650.27	271,000.00	781,000.00	70.89%
Expenses Total (Parts I, II, III)	\$ 4,806,647.78	\$ 5,118,500.00	\$ 5,761,225.00	83.43%
IV Owens Lake Scientific Advisory Panel				
A 2014 Stipulated Judgment (Paragraph 12.G)	\$ 260,080.74	\$ -	\$ 750,000.00	34.68%
FY 2018-2019 SB 270 Fee	\$ 5,066,728.52	\$ 5,118,500.00	\$ 6,511,225.00	77.82%

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2018-2019
For the 4th Quarter (Ending June 30, 2019)

REVENUE		4th Quarter	Budget	Adjusted Budget	% of Budget
I	Fees, Permits & Penalties	\$ 5,118,500.00	\$ 5,118,500.00	\$ 5,118,500.00	100.00%
	Reserve Policy Credit	\$ -	\$ -	\$ -	-
	Total SB 270 Fee Assessment	\$ 5,118,500.00	\$ 5,118,500.00	\$ 5,118,500.00	100.00%
II	Other Revenue				
	FY17-18 Carry-overs	132,725.00	-	132,725.00	100.00%
	Carry-over: Owens Lake Scientific Advisory Panel	750,000.00	-	750,000.00	100.00%
	From Asset Reserve:	-	-	-	-
	Interest	77,678.51	-	-	-
	Moved \$ out of Reserves, building purchase (BO#190307-06)	510,000.00	-	510,000.00	100.00%
	PM2.5 from District (Reimburse expense)	22,241.28	-	-	-
	Sales, Services, Rebates, Refunds	3,627.57	-	-	-
		1,496,272.36	-	1,392,725.00	107.43%
	TOTAL REVENUE	\$ 6,614,772.36	\$ 5,118,500.00	\$ 6,511,225.00	101.59%

Reconcile to Inyo County Treasury as of 6/30/2019

SB 270 General Fund Reserves	\$ 1,752,417.46
Capital Asset Accrual Reserves	\$ 286,422.46
Accrued Payables	\$ 1,053,758.60
SB 270 Fee Assessment FY 19-20	\$ 6,065,781.00
Spendable/Available Cash	\$ 801,669.05
	<u>\$ 9,960,048.57</u>

Balance, IC Auditor Report 6/30/2019 **\$ 9,960,048.57**

Checking account balance as of 6/30/2019=\$46,572.19

Interest transferred to PARS Trust = \$104,176.70



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Phillip L. Kiddoo, Air Pollution Control Officer
Ann Logan, Deputy Air Pollution Control Officer

Subject: Public Hearing- Consideration of Amendments to Rule 411 Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interfaces and the Smoke Management Program

As required by California Health and Safety Code (HSC) §40725-40726, this public hearing is being held for consideration of proposed revisions to the District's Smoke Management Program and District Rule 411- Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interface Areas.

A public workshop was held at the November 2019 Governing Board meeting to initiate the amendment process. Initial draft revisions were presented and discussed at the January 2020 Board Meeting. Updated proposed revisions were then sent to all the land management agencies. The revisions were public noticed and were sent to the California Air Resources Board for review as required. District staff and the Board have received and considered public comment through this process. This public hearing offers further opportunity for public comment and consideration.

The proposed amendments to the Smoke Management Program and District Rule 411 include:

- Updated the language to state that burning shall be managed to minimize smoke impacts to populated areas, protect public health, and to prevent public nuisance
- Removal of the prohibition from burning on Sundays and holidays
- Incorporation of requirements for unplanned or naturally ignited wildland fires managed for resource benefits
- Clarification of requirements and removal of redundant sections
- An emphasis on prioritizing public outreach and protection of public health

District staff has also prepared a Procedures Checklist to summarize the requirements of the Smoke Management Program and District Rule 411 to facilitate communication and cooperation with the land management agencies.

Public Hearing- Consideration of Amendments to Rule 411 Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interfaces and the Smoke Management Program (Action)

March 5, 2020 – Agenda Item No. 5 – Page 1

These revisions and additions to the program will assist both the District's Smoke Management Program and the prescribed burning programs of land management agencies, while ensuring the District retains the appropriate authority and discretion to protect public health.

Fiscal Impact

There is no fiscal impact to the revisions. District Rule 308, Prescribed Burning Fee, sets annual flat fees for land management agencies that conduct burn projects for range, forest and wildland vegetation management on areas greater than 1 acre in size or that are estimated to produce more than one ton of particulate matter. During Fiscal Year 2018-2019, the District collected \$5,842 in permit fees associated with prescribed burning. To date during Fiscal Year 2019-2020, the District has collected \$4,799. The revisions do not include any changes to the fees associated with the District Smoke Management Program. In the future, District staff does plan to review, analyze and if necessary, update all District fee schedules, including fees associated with Smoke Management.

Board Action:

District staff recommends the Governing Board:

- Conduct the Public Hearing
- Adopt Board Resolution 2020-01 which includes
 - 1) Make the necessary findings as required by HSC §40727,
 - 2) Adopting the revisions to the Smoke Management Program and Rule 411, and
 - 3) Authorizing and directing the Air Pollution Control Officer to execute the CEQA Addendum and file notice of determinations reflecting that action.

Attachments:

1. Redline copy of the proposed revisions to District Rule 411
2. Clean version of the proposed revisions to District Rule 411
3. Redline copy of the proposed revisions to the Smoke Management Program
4. Clean version of the proposed revisions to the Smoke Management Program
5. Smoke Management Program Procedure Checklist Document
6. California Environmental Quality Act (CEQA) Addendum No. 1 to the 2001 Negative Declaration
7. Governing Board Resolution 2020-01

Public Hearing- Consideration of Amendments to Rule 411 Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interfaces and the Smoke Management Program (Action)

March 5, 2020 – Agenda Item No. 5 – Page 2

RULE 411. WILDLAND VEGETATION MANAGEMENT BURNING ~~IN WILDLAND AND~~
~~WILDLAND/URBAN INTERFACE AREAS~~

Adopted: 09/05/74 Revised: 03/10/76, 07/01/92, 11/07/01, 03/05/20

- A. No wildland vegetation management burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency having jurisdiction over the proposed burn locations. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural or prescribed burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. No person shall conduct wildland vegetation management burning on "no--burn" days as announced ~~daily~~ by the ~~State-California~~ Air Resources Board (ARB) for the Inyo, Mono and Alpine Counties or when such burning is prohibited by the Air Pollution Control Officer except when the Air Pollution Control Officer has authorized, by special permit pursuant to Section 80120, of Title 17 of the California Code of Regulations ~~(CCR), Title 17,~~ agricultural or prescribed burning on days designated by the State Air Resources Board as no-burn days because the denial of such permit would threaten imminent and substantial economic loss. In authorizing such burning the Air Pollution Control Officer ~~may shall~~ limit the amount of acreage which can be burned in any one day and only authorize burning that is not forecasted to cause or significantly contribute to exceedances of the ambient air quality standards, when downwind populated areas are forecasted by the State Air Resources Board to achieve the ambient air quality standards. Every applicant for a permit to burn on a no-burn day agricultural waste pursuant to this section shall provide information in writing to the Air Pollution Control Officer for evaluation, stating why the denial of such a permit would threaten imminent and substantial economic loss.
- C. Wildland vegetation management burning, when permitted, shall conform to the following criteria:
1. The land manager, or ~~his/her~~their designee, shall annually or seasonally submit a potential list of burn projects to the Air Pollution Control Officer, including areas considered for potential naturally-ignited wildland fires managed for resource benefits, with updates as they occur.
 2. A Smoke Management Plan shall be submitted Ffor all burn projects greater than 1 acre in size or estimated to produce more than 1 ton of particulate matter. ~~., t~~The land manager, or ~~his/her~~their designee, shall submit a-the smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing at a minimum, the following information:
 - a. Location, types, and amounts of material to be burned;
 - b. Expected duration of the fire from ignition to extinction;
 - c. Identification of responsible personnel, including contact information~~telephone contacts;~~
 - d. Identification and location of all smoke sensitive areas; and

- e. Procedures for public notification and education, including public outreach, appropriate signage at burn sites, and for reporting of public smoke complaints.
3. For burn projects greater than 100 acres in size or estimated to produce more than 10 tons of particulate matter ~~contain, at a minimum,~~ the land manager, or ~~his/her~~their designee, shall submit a smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing all the information in subsection 2 and at a minimum the following additional information:
- a. Identification of meteorological conditions necessary for burning. The plan should include projections of where the smoke from burns is expected to travel.
 - b. The smoke management criteria the land manager or ~~his/her~~their designee will use for making burn ignition decisions.
 - c. Discussion of the actions that will be taken to minimize smoke impacts. Projections, including a map, of where the smoke from burns are expected to travel, both day and night.
 - d. Specific mitigations and contingency actions (such as fire suppression or containment) that will be taken when identified thresholds or management action points if smoke impacts occur or meteorological conditions deviate from those specified in the smoke management plan.
 - e. An evaluation of considered alternatives to burning ~~considered; if an analysis of alternatives has been prepared as part of the environmental documentation required for the burn project pursuant to the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA), as applicable, the analysis shall be attached to the smoke management plan in satisfaction of this requirement.~~
 - f. Discussion of pPublic notification procedures and methods.
4. If smoke may impact smoke sensitive areas, the land manager, or ~~his/her~~their designee, shall include in the smoke management plan; public outreach and messaging, smoke forecasting, visual monitoring, ambient particulate matter monitoring or other monitoring or mitigation measures approved by the ~~district~~District, as required by the Air Pollution Control Officer for the following burn projects:
- a. Projects greater than 250 acres;
 - b. Projects that will continue burning or producing smoke overnight;
 - c. Projects conducted near smoke sensitive areas; or
 - d. As otherwise required by the Air Pollution Control Officer.

5. Daily burn authorization from the District is required for all burn projects requiring a Smoke Management Plan to minimize smoke impacts to smoke sensitive areas and avoid cumulative smoke impacts. The land manager shall request burn authorization via a method approved by the District at least 3 days in advance of the planned burn and shall specify the amount, timing and location of the burning to be completed. The District will issue daily burn authorizations at least 24-hours prior to the burn. The District's burn authorization may be contingent upon, or subject to change based on ARB burn day determination, air quality conditions, meteorological conditions, or other conditions affecting smoke dispersion. The District shall consider the following factors in reviewing a daily burn request:

- a. ARB burn day determination or forecast;
- b. Current and forecasted ambient air quality conditions;
- c. Forecasted meteorological conditions, including wind speeds and directions at the surface and aloft, and atmospheric stability;
- d. Types and amounts of materials to be burned;
- e. Location and timing of materials to be burned;
- f. Locations of smoke sensitive areas; and
- g. Smoke from all burning activities, including burning in neighboring air districts or regions which may affect the District or region.

5.6. For multi-dayany burns which may impact smoke sensitive areas, the land manager or his/hertheir designee, shall coordinate with and provide dailynotification to the District and the ARB to affirm that the burn project remains within the conditions specified in the smoke management plan, or to determine whether contingency actions are necessary.

6.7. For any natural ignition that occurs on a no-burn day, the initial "go/no-go" decision to manage the fire for resource benefit will be a "no-go" unless:

- a. After consultation with the ~~district~~District, the ~~district~~District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
- b. For periods of less than 24 hours, a reasonable effort has been made to contact the ~~district~~District, or if the ~~district~~District is not available, the ARB;
- c. After 24 hours, the District has been contacted, or if the District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit.

A "no-go" decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

8. For any unplanned or naturally-ignited wildland fire managed for resource benefits that are expected to exceed 10 acres in size, the land manager or

his/her/their designee, shall submit a smoke management plan to the District for review and approval within 72 hours of the start of a fire. In addition to the requirements for a planned ignition, Smoke management plans for unplanned or naturally-ignited wildland fire managed for resource benefits shall include:

- a. Incorporation of air quality management considerations in fire management documents and decisions.
- b. Adaptive management based on forecasted and monitored smoke concentrations to match emissions to dispersion opportunities. The District may require limiting or postponing ignitions to avoid cumulative smoke impacts, prevent public nuisance, and prevent violations of the ambient air quality standards.
- c. Public notification and messaging methods.
- d. Additional forecasting, monitoring, and mitigation measures as appropriate

7.9. The land manager or his/her/their designee, shall ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and prior to ignition.

8.10. For burn projects greater than 250 acres, the land manager or his/her/their designee shall perform a post-burn smoke management evaluation.

9.11. Vegetation shall be in a condition that will minimize the smoke emitted during combustion when feasible, considering fire safety and other factors.

10.12. Material to be burned ~~shall~~should be piled where possible, unless good silvicultural practices or ecological goals dictate otherwise. Piled material shall be prepared so that it will burn with a minimum of smoke.

~~11. Piled material to be burned shall be prepared so that it will burn with a minimum of smoke.~~

12.13. If the burn is to be done primarily for improvement of land for wildlife and game habitat, the burn plan applicant shall file with the District a statement from the Department of Fish and Game certifying that the burn is desirable and proper, if the burn is to be done primarily for improvement of land for wildlife and game habitat. The Department of Fish and Game may specify the amount of brush treatment required, along with any other conditions it deems appropriate.

13.14. Burn plans shall limit or postpone burning, or require mitigation, when the meteorological conditions and smoke impacts may ~~could otherwise~~ cause ~~smoke to create~~ or contribute to an exceedance of a state or federal ambient air quality standard or cause a public nuisance.

~~14.15.~~ Vegetation to be burned shall be free of tires, rubbish, tar paper or construction debris, and reasonably free of dirt and soil.

~~15.16.~~ The material to be burned shall be ignited only by devices approved by the California Department of Forestry and Fire Protection, or the local fire protection agency, and ignition shall be as rapid as practicable within applicable fire control restrictions.

~~16. Prescribed burning shall not be allowed on Sundays, the last Saturday in April, or legal holidays, except for multi-day burns that cannot be reasonably treated on other days.~~

17. All burning shall conform to the applicable jurisdictional fire code(s).

18. Burning shall be managed to minimize smoke impacts to smoke sensitive areas.
~~curtailed when smoke is drifting into a populated area or creating a public nuisance.~~

D. The total amount of material burned in any one day, may be limited or postponed by the District, taking into consideration matters which would affect the ambient air quality of the District including current and forecasted air quality conditions; meteorological conditions; the types and amounts of material to be burned; the location and timing of material to be burned; the location of smoke sensitive areas; and the cumulative smoke impacts from all burning activities within and outside the District.

[Intentionally left blank.]

RULE 411. WILDLAND VEGETATION MANAGEMENT BURNING

Adopted: 09/05/74 Revised: 03/10/76, 07/01/92, 11/07/01, 03/05/20

- A. No wildland vegetation management burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency having jurisdiction over the proposed burn locations. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural or prescribed burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. No person shall conduct wildland vegetation management burning on "no-burn" days as announced by the California Air Resources Board (ARB) for the Inyo, Mono and Alpine Counties or when such burning is prohibited by the Air Pollution Control Officer except when the Air Pollution Control Officer has authorized by special permit pursuant to Section 80120 of Title 17 of the California Code of Regulations agricultural or prescribed burning on days designated by the State Air Resources Board as no-burn days because the denial of such permit would threaten imminent and substantial economic loss. In authorizing such burning the Air Pollution Control Officer may limit the amount of acreage which can be burned in any one day and only authorize burning that is not forecasted to cause or significantly contribute to exceedances of the ambient air quality standards. Every applicant for a permit to burn on a no-burn day pursuant to this section shall provide information in writing to the Air Pollution Control Officer for evaluation, stating why the denial of such a permit would threaten imminent and substantial economic loss.
- C. Wildland vegetation management burning, when permitted, shall conform to the following criteria:
 - 1. The land manager, or their designee, shall annually or seasonally submit a potential list of burn projects to the Air Pollution Control Officer, including areas considered for potential naturally-ignited wildland fires managed for resource benefits, with updates as they occur.
 - 2. A Smoke Management Plan shall be submitted for all burn projects greater than 1 acre in size or estimated to produce more than 1 ton of particulate matter. The land manager, or their designee, shall submit the smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing at a minimum, the following information:
 - a. Location, types, and amounts of material to be burned;
 - b. Expected duration of the fire from ignition to extinction;
 - c. Identification of responsible personnel, including contact information;
 - d. Identification and location of all smoke sensitive areas; and
 - e. Procedures for public notification and education, including public outreach, appropriate signage at burn sites, and for reporting of public smoke complaints.

3. For burn projects greater than 100 acres in size or estimated to produce more than 10 tons of particulate matter the land manager, or their designee, shall submit a smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing all the information in subsection 2 and at a minimum the following additional information:
 - a. Identification of meteorological conditions necessary for burning. The plan should include projections of where the smoke from burns is expected to travel.
 - b. The smoke management criteria the land manager or their designee will use for making burn ignition decisions.
 - c. Discussion of the actions that will be taken to minimize smoke impacts.
 - d. Specific mitigations and contingency actions (such as fire suppression or containment) that will be taken when identified thresholds or management action points occur or meteorological conditions deviate from those specified in the smoke management plan.
 - e. An evaluation of considered alternatives to burning.
 - f. Public notification procedures and methods.
4. If smoke may impact smoke sensitive areas, the land manager, or their designee, shall include in the smoke management plan; public outreach and messaging, smoke forecasting, visual monitoring, ambient particulate matter monitoring or other monitoring or mitigation measures approved by the District, as required by the Air Pollution Control Officer for the following burn projects:
 - a. Projects greater than 250 acres;
 - b. Projects that will continue burning or producing smoke overnight;
 - c. Projects conducted near smoke sensitive areas; or
 - d. As otherwise required by the Air Pollution Control Officer.
5. Daily burn authorization from the District is required for all burn projects requiring a Smoke Management Plan to minimize smoke impacts to smoke sensitive areas and avoid cumulative smoke impacts. The land manager shall request burn authorization via a method approved by the District at least 3 days in advance of the planned burn and shall specify the amount, timing and location of the burning to be completed. The District will issue daily burn authorizations at least 24-hours prior to the burn. The District's burn authorization may be contingent upon, or subject to change based on ARB burn day determination, air quality conditions, meteorological conditions, or other conditions affecting smoke dispersion. The District shall consider the following factors in reviewing a daily burn request:
 - a. ARB burn day determination or forecast;
 - b. Current and forecasted ambient air quality conditions;

- c. Forecasted meteorological conditions, including wind speeds and directions at the surface and aloft, and atmospheric stability;
 - d. Types and amounts of materials to be burned;
 - e. Location and timing of materials to be burned;
 - f. Locations of smoke sensitive areas; and
 - g. Smoke from all burning activities, including burning in neighboring air districts or regions which may affect the District or region.
6. For any burns which may impact smoke sensitive areas, the land manager or their designee, shall coordinate with and provide notification to the District and the ARB to affirm that the burn project remains within the conditions specified in the smoke management plan, or to determine whether contingency actions are necessary.
7. For any natural ignition that occurs on a no-burn day, the initial “go/no-go” decision to manage the fire for resource benefit will be a “no-go” unless:
- a. After consultation with the District, the District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
 - b. For periods of less than 24 hours, a reasonable effort has been made to contact the District, or if the District is not available, the ARB;
 - c. After 24 hours, the District has been contacted, or if the District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit.

A “no-go” decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

8. For any unplanned or naturally-ignited wildland fire managed for resource benefits that are expected to exceed 10 acres in size, the land manager or their designee, shall submit a smoke management plan to the District for review and approval within 72 hours of the start of a fire. In addition to the requirements for a planned ignition, Smoke management plans for unplanned or naturally-ignited wildland fire managed for resource benefits shall include:
- a. Incorporation of air quality management considerations in fire management documents and decisions.
 - b. Adaptive management based on forecasted and monitored smoke concentrations to match emissions to dispersion opportunities. The District may require limiting or postponing ignitions to avoid cumulative smoke impacts, prevent public nuisance, and prevent violations of the ambient air quality standards.
 - c. Public notification and messaging methods.
 - d. Additional forecasting, monitoring, and mitigation measures as appropriate

GBUAPCD – Rule 411

Page 3 of 4

03/05/20

9. The land manager or their designee shall ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and prior to ignition.
 10. For burn projects greater than 250 acres, the land manager or their designee shall perform a post-burn smoke management evaluation.
 11. Vegetation shall be in a condition that will minimize the smoke emitted during combustion when feasible, considering fire safety and other factors.
 12. Material to be burned should be piled where possible unless good silvicultural practices or ecological goals dictate otherwise. Piled material shall be prepared so that it will burn with a minimum of smoke.
 13. If the burn is to be done primarily for improvement of land for wildlife and game habitat, the burn plan applicant shall file with the District a statement from the Department of Fish and Game certifying that the burn is desirable and proper. The Department of Fish and Game may specify the amount of brush treatment required, along with any other conditions it deems appropriate.
 14. Burn plans shall limit or postpone burning, or require mitigation, when the meteorological conditions and smoke impacts may cause or contribute to an exceedance of a state or federal ambient air quality standard or cause a public nuisance.
 15. Vegetation to be burned shall be free of tires, rubbish, tar paper or construction debris, and reasonably free of dirt and soil.
 16. The material to be burned shall be ignited only by devices approved by the California Department of Forestry and Fire Protection, or the local fire protection agency, and ignition shall be as rapid as practicable within applicable fire control restrictions.
 17. All burning shall conform to the applicable jurisdictional fire code(s).
 18. Burning shall be managed to minimize smoke impacts to smoke sensitive areas.
- D. The total amount of material burned in any one day may be limited or postponed by the District, taking into consideration matters which would affect the ambient air quality of the District including current and forecasted air quality conditions; meteorological conditions; the types and amounts of material to be burned; the location and timing of material to be burned; the location of smoke sensitive areas; and the cumulative smoke impacts from all burning activities within and outside the District.

**Smoke Management Program
for the Great Basin Unified
Air Pollution Control District**

Smoke Management Program for the Great Basin Unified Air Pollution Control District

Table of Contents

	<u>Page</u>
1.0 Purpose of the Smoke Management Program	<u>13</u>
2.0 Requirements for <u>Prescribed and</u> Agricultural Burning Operations	<u>13</u>
2.1 Applicable Open Burning Activities	1
2.2 General Requirements for Agricultural Burning	2
2.3 <u>3.0</u> Smoke Management Plans for Range Improvement, Forest Management, and Wildland Vegetation Management Burning	35
• For Burn Projects Greater than 1 acre or 1 ton of PM:	<u>35</u>
• For Burn Projects Greater than 100 acres or 10 tons of PM:	<u>46</u>
• If Smoke May Impact Sensitive Areas:	<u>46</u>
• For Multi-Day Burns:	<u>57</u>
• For <u>Accidental-Unplanned</u> or Natural Ignition Fires:	<u>57</u>
3.0 <u>Permissive Burn Days</u> <u>4.0</u> <u>Burn Day Determination</u>	58
3.1 No Burn Days for High Fire Hazard Conditions	6
3.2 Permissive Burn Day Forecasts	6
3.3 <u>5.0</u> Daily Burn Authorization	<u>79</u>
4.0 <u>6.0</u> District Smoke Management Program Tracking and Enforcement	<u>810</u>
<u>7.0</u> <u>Cross Jurisdictional Smoke Impacts</u>	<u>10</u>
 Table 1. Limiting Mean 500-Millibar Heights by Month	 <u>68</u>
Figure 1. Map of Great Basin Unified <u>Air Pollution Control District</u>	<u>911</u>
Attachment A – Memorandum of Agreement for Smoke Management	
Attachment B-A – District Regulations for Open Outdoor Burning	<u>12</u>
Attachment C-B – Example Form for Smoke Management Plan Attachment D	<u>36</u>
– Example ARB Form for Controlled Burn (CB) Notices (24, 48, 72 and 96 hour)	
Attachment E-C – Example Special Permit Form to Burn on a No-Burn Day	<u>50</u>

Formatted: Indent: Left: 0.11", No bullets or numbering

Formatted: Indent: Left: 0.11", Right: 0", No bullets or numbering, Tab stops: 0.38", Left + Not at 0.61"

Formatted: Indent: Left: 0.13", Space Before: 6.05 pt, No bullets or numbering, Tab stops: 0.38", Left + Not at 0.61"

Formatted: Indent: Left: 0.11", No bullets or numbering

Formatted: Indent: Left: 0.11", No bullets or numbering, Tab stops: 0.38", Left + Not at 0.61"

Formatted: Right: 0.03"

Formatted: Indent: Left: 0.11", Right: 0.99", Space Before: 0 pt, Line spacing: Multiple 1.22 li

Smoke Management Program for the Great Basin Unified Air Pollution Control District

1.0 Purpose of the Smoke Management Program

The Smoke Management Program for the Great Basin Unified Air Pollution Control District (District) was developed in cooperation with the California Air Resources Board, public and private land managers, and fire protection authorities ~~for the purpose of minimizing to minimize~~ adverse air quality impacts related to smoke from prescribed burning; to protect public health; and to meet the requirements of the California Code of Regulations, Title 17, Smoke Management Guidelines for Agricultural and Prescribed Burning within the District's jurisdiction of Inyo, Mono, and Alpine counties (See Figure 1). This smoke management program was adopted by the ~~Great Basin Unified Air Pollution Control~~ District Governing Board on November 7, 2001 and was revised on March 5, 2020. ~~Each participating agency is a signatory to a Memorandum of Agreement for Smoke Management (Attachment A), which outlines the roles and responsibilities of the agencies to comply with the requirements of the Smoke Management Program and the District regulations for prescribed burning. Current participating agencies include: Great Basin Unified Air Pollution Control District (District), California Air Resources Board (ARB), Inyo National Forest, Humboldt-Toiyabe National Forest, Eldorado National Forest, Stanislaus National Forest, Death Valley National Park, US Bureau of Land Management and the California Department of Forestry. Additional signatories to the Agreement may be added in the future.~~

~~This Smoke Management Program was adopted by the Great Basin Unified APCD Board along with revisions to the District's regulations for open outdoor fires. The Smoke Management Program and corresponding regulations were revised and adopted to comply with the agricultural burning requirements in Title 17 of the California Code of Regulations (effective March 14, 2001). District regulations related to open outdoor fires and prescribed burning for agricultural operations, forest management, range management and wildlands and wildland/urban interface areas are included in Attachment B.~~

~~2.1~~ 2.0 Requirements for Prescribed and Agricultural Burning Operations

~~2.2~~ Applicable Open Burning Activities

The District's Smoke Management Program and corresponding regulations for prescribed burning apply to all open outdoor fires used in agricultural and prescribed burning operations for:

- The growing of crops or raising of fowl or animals,
- Forest management and/or range improvement,
- ~~Range improvement~~,
- Improvement of land for wildlife and game habitat,
- Disease or pest prevention,
- Maintenance of water delivery systems,
- Wildland vegetation management, and
- ~~Natural or accidental wildfire ignitions~~ Unplanned or naturally ignited wildland fire managed for resource benefits.

Formatted: Justified, No bullets or numbering, Tab stops: Not at 0.57"

Formatted: No bullets or numbering

Detailed definitions for agricultural burning and prescribed burning activities are included in Rule 101 Definitions, see Attachment ~~B~~A.

Most of the requirements discussed in this program document do not apply to ~~non-prescribed burning or~~ non-agricultural burning operations. Requirements pertaining to open outdoor fires for ~~non-prescribed burning~~ and non-agricultural burning operations can be found in the District open outdoor burning regulations in Attachment ~~B~~A.

2.3 General Requirements for Prescribed and Agricultural Burning

Formatted: No bullets or numbering

~~District regulations included in Attachment B provide detailed requirements for agricultural burning.~~ The following is a summary of the District's prescribed and agricultural burning regulations to provide an overview of the requirements of the District's open outdoor burning regulations (Attachment A): for prescribed burning. ~~These requirements apply to all agricultural burning.~~

- a. Prescribed burning is to be conducted on permissive burn days, unless a special burn permit is obtained from the Air Pollution Control Officer (APCO).
- b. No person shall burn agricultural waste without a burn permit issued by the fire protection agency with jurisdiction for the location of the burn.
- c. Burning shall be managed to minimize smoke impacts to populated areas, to protect public health, and to prevent public nuisance. ~~curtailed when smoke is drifting into a populated area or creating a public nuisance.~~
- d. Vegetation to be burned shall be free of tires, rubbish, tar paper or construction debris, and reasonably free of dirt and soil.
- e. Material to be burned shall be arranged in a manner and condition so as to burn with a minimum size of smoke. ~~so as to burn with a minimum size of smoke.~~

These additional requirements apply to prescribed and agricultural burning for ~~the purpose of~~ range improvement, forest management, and wildland vegetation management. The land manager or ~~his/her~~their designee, shall:

- f. Submit an annual or seasonal list of proposed burn projects to the APCO, including areas considered for potential naturally-ignited wildland fires managed for resource benefits.
- g. Submit a smoke management plan to the APCO for review and approval for all burn projects over 1 acre or that have the potential to emit more than 1 ton of particulate matter emissions; at least 30 days in advance of the proposed burn project, and for accidental or Smoke management plans for unplanned or naturally-ignited wildland fires managed for resource benefits that are expected to exceed 10 acres in size shall be submitted within 72 hours of the start of a fire. ~~at least 30 days in advance of the proposed burn project, and for accidental or~~
- h. Notify the District at least 3 days before a planned burn to receive a burn day

authorization before proceeding with the burn.

- i. Submit ~~information as requested by the District reports in January of each year,~~ summarizing prescribed burning activities conducted by the Fire Management Agency in the last calendar year. Reports should include the date, location, fuel type, fuel loading, and total acres or tons of vegetation burned for each prescribed burn operation and wildfire. The annual reports will allow the District to track the total particulate matter emissions from prescribed burning operations and to determine general conformity with the air quality plans in federal PM-10 non-attainment areas.
- j. Ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and ~~before prior to~~ ignition.

~~2.4 3.0 Smoke Management Plans for Range Improvement, Forest Management, and Wildland Vegetation Management Burning~~

~~An example form for smoke management plans is included in Attachment C. The This section addresses the specific requirements for information that must by be included in the smoke management plans as required by can be found in District Rule 411.C and is discussed below. Smoke management plans should be submitted via a method approved by the District.~~

- **For Burn Projects Greater than 1 acre or 1 ton of PM:**

For burn projects greater than 1 acre in size or estimated to produce more than 1 ton of particulate matter, the land manager, or ~~his/her~~their designee, shall submit a smoke management plan to the APCO for review and approval in advance of the proposed burn project, containing at a minimum the following information:

- a. Location, types, and amounts of material to be burned;
- b. Expected duration of the fire from ignition to extinction;
- c. Identification of responsible personnel, including ~~telephone~~ contact informations;
- d. Identification and location of all smoke sensitive areas; and
- e. Procedures for public notification and education, including messaging, appropriate signage at burn sites, and for reporting of public smoke complaints.

~~For burn projects greater than 250 acres and for any burn from which the APCO determines that there has been a significant smoke impact, the land manager or his/her designee shall also perform a post burn smoke management evaluation.~~

Formatted: No bullets or numbering, Tab stops: Not at 0.57"

- **For Burn Projects Greater than 100 acres or 10 tons of PM:**

For burn projects greater than 100 acres in size or estimated to produce more than 10 tons of particulate matter, the land manager, or ~~his/her~~their designee, shall submit a smoke management plan to the APCO for review and approval in advance of the proposed burn project, containing, at a minimum, all the information shown above for the less than 1 acre or 1 ton burns, and the following additional information:

- Identification of meteorological conditions necessary for burning. The plan should include projections of where the smoke from burns is are expected to travel.
- The smoke management criteria the land manager or ~~his/her~~their designee will use for making burn ignition decisions.
- Discussion of the actions that will be taken to minimize smoke impacts. Projections, including a map, of where the smoke from burns are expected to travel, both day and night.
- Specific mitigations and contingency actions (such as fire suppression or containment) that will be taken ~~if when identified thresholds or management action points~~smoke impacts occur or meteorological conditions deviate from those specified in the smoke management plan.
- An evaluation of considered alternatives to burning ~~considered, if an analysis of alternatives has been prepared as part of the environmental documentation required for the burn project pursuant to the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA), as applicable, the analysis shall be attached to the smoke management plan in satisfaction of this requirement.~~
- ~~Discussion of p~~Public notification procedures and methods.
- PM10 emissions from burn projects are limited to ~~10 tons within the Mono-Basin non-attainment area and to~~ 42 tons within the Owens Valley non-attainment area (See Figure 1) in accordance with the State Implementation Plan (SIP) ~~for each area~~ and to the General Conformity provisions of District Regulation XIII.

For burn projects greater than 250 acres and for any burn from which the APCO determines that there has been a significant smoke impact, the land manager or their designee shall also perform a post-burn smoke management evaluation.

- **If Smoke May Impact Sensitive Areas:**

If smoke may impact smoke sensitive areas, the land manager, or ~~his/her~~their designee, shall include in the smoke management plan: public outreach and messaging, smoke forecasting, visual monitoring, ambient particulate matter monitoring or other monitoring or mitigation measures approved by the ~~district~~District, as required by the APCO for the following burn projects:

- Projects greater than 250 acres;

- b. Projects that will continue burning or producing smoke overnight;
- c. Projects conducted near smoke sensitive areas; or
- d. As otherwise required by the Air Pollution Control Officer.

- **For Multi-Day Burns:**

For multi-day burns which may impact smoke sensitive areas, the land manager or ~~his/her/their~~ designee, shall coordinate with and provide ~~daily~~ notification to the District and California Air Resources Board (ARB) to affirm that the burn project remains within the conditions specified in the smoke management plan, or to determine whether contingency actions are necessary.

- **For ~~Accidental-Unplanned~~ or ~~Naturally-Ignited~~ Fires:**

For ~~any accidental-unplanned~~ or naturally-ignited wildland fires managed for resource benefits that are expected to exceed 10 acres in size, the land manager or ~~his/her/their~~ designee, shall submit a smoke management plan to the District for review and approval within 72 hours of the start of a fire.

In addition to the requirements for a planned ignition, smoke management plans for unplanned or naturally-ignited wildland fire managed for resource benefits shall include:

- Incorporation of air quality management considerations in fire management documents and decisions.
- Adaptive management based on forecasted and monitored smoke concentrations to match emissions to dispersion opportunities. The District may require limiting or postponing ignitions to avoid cumulative smoke impacts, prevent public nuisance, and prevent violations of the ambient air quality standards.
- Public notification and messaging methods.
- Additional forecasting, monitoring and mitigation measures as appropriate.

Per Title 17, Ffor any ~~accidental-unplanned~~ or natural ignition that occurs on a no-burn day, the initial “go/no-go” decision to manage the fire for resource benefit will be a “no-go” unless:

- a. After consultation with the ~~district~~District, the ~~district~~District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
- b. For periods of less than 24 hours, a reasonable effort has been made to contact the District, or if the District is not available, ARB;
- c. After 24 hours, the District has been contacted, or if the District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit.
- d. A “no-go” decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

4.0 Permissive-Burn Days Burn Day Determination

“Permissive-burn days”, “~~marginal burn days~~” and “no-burn days” for open outdoor burning will be determined by ~~the California Air Resources Board (ARB)~~ for the Great Basin Valleys Air Basin, which includes; Inyo, Mono and Alpine Counties. A permissive burn day will be declared when the following criteria are met:

- a. Near 4:00 a.m., the mean 500 mb height over the Great Basin Valleys Air Basin is less than the limiting mean height given in the Table 1.
- b. The expected 4:00 p.m. mean 500 mb height over the Great Basin Valleys Air Basin is less than the limiting mean height given in the Table 1.

Table 1. Limiting Mean 500-Millibar Heights by Month

Month	Mean 500-mb Height (meters)	<u>Mean 500-mb Height (feet)</u>
January	5750	<u>18865</u>
February	5740	<u>18832</u>
March	5740	<u>18832</u>
April	5760	<u>18898</u>
May	5800	<u>19029</u>
June	5850	<u>19193</u>
July	5880	<u>19291</u>
August	5880	<u>19291</u>
September	5870	<u>19259</u>
October	5850	<u>19193</u>
November	5810	<u>19062</u>
December	5780	<u>18963</u>

No-Burn Days for High Fire Hazard Conditions

Federal, State or local fire protection agencies in Inyo, Mono, or Alpine Counties may prohibit burning on days when weather and/or fuel moisture conditions create a potential wildfire risk. The ARB burn day determinations are not intended to permit open burning on days when such burning is prohibited by public fire protection agencies for purposes of fire control or prevention. In this case, “no-burn” day determinations declared by fire protection agencies over-rides permissive burn day determinations made by the ARB. ~~The determinations are broadcast daily through the local radio stations and can be confirmed by calling the Owens Valley Interagency Control Center (dispatch) at (760)-873-2405.~~

Permissive Burn Day Forecasts

The ARB shall specify each day of the year as a permissive burn day or a no-burn day for each air basin. Burn day decisions will be provided by ARB for the following day by

Formatted: Indent: Left: 0.07", No bullets or numbering

~~3:00 p.m. every day. The ARB will provide a daily voice message that will be updated at 3:00 PM to declare the burn day status for the following day in the Great Basin Valleys Air Basin. This voice message can be obtained by calling (916) 445-0745.~~

Forty-eight (48), 72 and 96-hour burn day forecasts can be obtained ~~by calling on request from~~ the ARB Meteorology Section ~~at (916) 322-6014 and by submitting a request on the form in Attachment D.~~ An ~~advance 2 or 3 day~~ forecast should be obtained from ARB for any prescribed burn that will involve significant resources and would cause a hardship if the burn were cancelled due to the no-burn day status. Although the Air Pollution Control Officer may issue a special permit to conduct a prescribed burn on a "no-burn" day as declared by the ARB, the permittee will be required to show good cause for granting the special permit, and the amount of material allowed to be burned may be limited by the APCO (see Attachment ~~A E and Rule 411.B.2~~).

3.2 5.0 Daily Burn Authorization

~~Daily burn authorization from the District is required for all burn projects requiring a Smoke Management Plan to minimize smoke impacts to smoke sensitive areas and avoid cumulative smoke impacts. The land manager shall request burn authorization via a method approved by the District at least 3 days in advance of the planned burn and shall specify the amount of material, timing and location of the burning to be completed. In order to minimize smoke impacts on smoke sensitive areas, avoid cumulative smoke impacts, and prevent public nuisance, the amount of prescribed burning may be limited on a daily basis or postponed if the APCO determines that air quality is expected to exceed State or federal air quality standards on the day of a proposed burn. The District will issue daily burn authorizations at least 24-hours prior to before the burn, however, this The District's burn authorization may be contingent upon, or is subject to change, if based on ARB burn day decisions/determinations, air quality conditions, meteorological conditions, or other conditions affecting smoke dispersion, or air quality are different from those that were anticipated. The District may limit the amount or acreage of material to be burned, or require postponement of a burn. The District shall consider the following factors when reviewing a daily burn request:~~

~~The land manager or his/her designee shall contact the District office by calling (760) 872-8211, at least 3 days prior to any anticipated prescribed burn for burn projects that will be greater than 1 acre in area or emit more than 1 ton of PM-10 to receive a District daily burn authorization. If a wildfire or an approved burn project is within 25 miles of another approved burn project and is planned for the same day, t~~

~~The APCO may limit the amount of material to be burned, or require the postponement of a prescribed burn, considering the following factors:~~

- ~~a. ARB burn day determination or forecast~~
- ~~b. Current and forecasted Air quality conditions;~~
- ~~c. Forecasted Meteorological conditions, expected during burning, including wind speeds and directions at the surface and aloft, and atmospheric stability;~~
- ~~d. Types and amounts of materials to be burned;~~

Formatted: No bullets or numbering, Tab stops: Not at 0.57"

- e. Location and timing of materials to be burned;
- f. Locations of smoke sensitive areas; and
- g. Smoke from all burning activities, including other burns with the District or burning in neighboring air districts or regions which may affect the ~~district-~~ District or region.

4.06.0 District Smoke Management Program Tracking and Enforcement

For all prescribed and agricultural burns requiring a smoke management plan, the District will maintain records including the location, type of burn and estimated tonnage and/or acreage burned. The District may request information from the land managers for additional information. An annual prescribed burning report summarizing the burn activities and the amount of material treated will be submitted to ARB within 45 days of the end of each calendar year as required by Title 17.

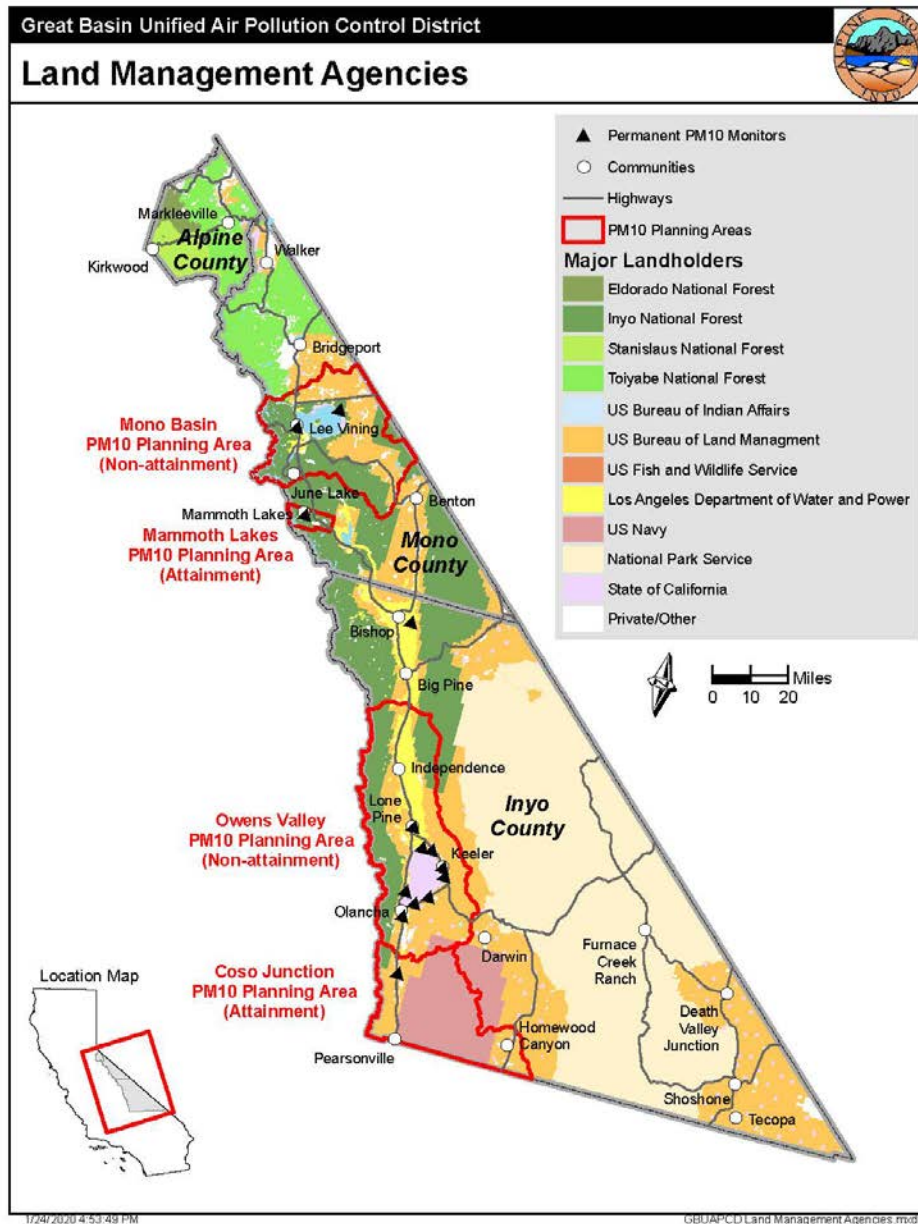
Land managers, fire protection personnel or the public may contact the APCO, Deputy APCO or the smoke management program coordinator at the District office (760) 872-8211 if there are any questions regarding the smoke management program or burn day authorizations. The APCO, DAPCO, and two ~~inspectors-~~ Air Quality Specialists will be responsible for enforcement of all District regulations related to open outdoor fires and prescribed burning. Notices of violation issued for open outdoor fires or prescribed burning will be treated and settled in the same manner as all other District regulations.

7.0 Cross-Jurisdictional Smoke Impacts

The District will communicate and coordinate with surrounding air districts and jurisdictions regarding cross-jurisdictional smoke impacts. For burns occurring outside the District's jurisdiction, District staff will maintain regular communication with surrounding air districts and jurisdictions to ensure the District and public are notified of burns that may impact the district and to ensure the potential impacts to the District are considered in decision making. Additionally, if smoke from a project with District boundaries may impact other jurisdictions, District staff shall notify the appropriate air quality agency as soon as practical and before ignition.

~~The Smoke Management Program coordinator will ensure that the State of Nevada Department of Environmental Protection are advised of any prescribed burns that take place within 50 miles of Nevada. The program coordinator will also track prescribed burns and wildfires in the Sequoia, Kings Canyon and Yosemite National Parks, the Mountain Counties, Tahoe, Mojave Desert, and the San Joaquin Valley air basins. Fire tracking will be done by FAX and internet access to the Park Service and Forest Service fire websites. If requested, other agencies or the public will be advised of prescribed burns that take place in the District. An annual prescribed burning report summarizing the burn activities and the amount of material treated will be submitted to ARB at the end of each year.~~

Figure 1. Map of Great Basin Unified ~~APCD~~ Air Pollution Control District



Attachment A

District Regulations

for Open Outdoor Burning

RULE 101. DEFINITIONS

Adopted: 09/05/74 Revised: 03/10/76, 10/01/76, 06/25/79, 02/09/81, 11/04/92, 05/08/96, 11/07/01, 09/24/03

Except as otherwise specifically provided in these rules and except where the content otherwise indicates, words used in these rules are used in exactly the same sense as the same words are used in Part 1 of Division 26 of the Health and Safety Code.

A. AGRICULTURAL BURNING

1. "Agricultural burning" means open outdoor fires used in 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.
2. "Agricultural burning" also means open outdoor fires used in the operation or maintenance of a system for the delivery of water for the purposes specified in Subsection 1.
3. "Agricultural burning" also means open outdoor fires used in wildland vegetation management burning. 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, tule, or standing brush. Prescribed burning is the planned application of fire to vegetation to achieve any specific objective on lands selected in advance of that application. The planned application of fire may also include natural or accidental ignition.

B. AGRICULTURAL OPERATION

"Agricultural operation" means the growing of crops, the raising of fowl, animals or bees, as a gainful occupation.

C. AGRICULTURAL WASTES

"Agricultural wastes" are defined as unwanted or unsalvageable material produced wholly from agricultural operations directly related to the growing of crops or the raising of animals for the primary purpose of making a profit or for a livelihood. This also includes, for the purpose of cultural practice burns, the burning of fence rows and ditch banks for weed control and weed maintenance and burning in nontillage orchards operations and of paper raisin trays, but does not include such items as shop wastes, demolition materials, garbage, oil filters, tires, pesticide containers (except paper pesticide containers), broken boxes, pallets, and other similar material, or orchard or vineyard wastes removed for land use conversion to non-agricultural purposes.

D. AIR CONTAMINANTS

"Air Contaminant" includes smoke, charred paper, dust colloids, soot, grime, carbon, noxious acid, noxious fumes, noxious gases, odors, or particulate matter, or any combination thereof.

E. ATMOSPHERE

"Atmosphere" means the air that envelopes or surrounds the earth. Where air contaminants are emitted into a building or structure not designed specifically as a piece of air pollution control equipment such emission into the building or structure shall be considered an emission into the atmosphere.

F. BOARD

"Board" means the Air Pollution Control Board of the Great Basin Unified Air Pollution Control District.

G. BRUSH TREATED

"Brush treated" means that the material to be burned has been felled, crushed or uprooted with mechanical equipment, has been desiccated with herbicides, or is dead.

H. BURN DAY

"Burn day," or "permissive-burn day" means any day on which agricultural burning, including prescribed burning, is not prohibited by the state board within the Great Basin Unified Air Pollution Control District and is authorized by the Air Pollution Control Officer consistent with District regulations related to open outdoor fires.

I. COMBUSTIBLE REFUSE

"Combustible Refuse" is any solid or liquid combustible waste material containing carbon in a free or combined state.

J. COMBUSTION CONTAMINANTS

"Combustion Contaminants" are solid or liquid particles discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state.

K. DUSTS

"Dusts" are minute solid particles released into the air by natural forces or by mechanical processes such as crushing, grinding, milling, drilling, demolishing, blasting, shoveling, conveying, covering, bagging and sweeping or any combination thereof.

L. FLUE

"Flue" means any duct or passage for air, gases, or the like, such as a stack or chimney.

M. FOREST MANAGEMENT BURNING

"Forest Management Burning" means the use of open fires, as a part of a forest practice, to remove forest debris. Forest management practices include timber operations, silvicultural practices or forest protection practices.

1. "Timber Operations" means cutting or removal of timber or other forest vegetation.
2. "Silvicultural" means the establishment, development, care and reproduction of stands of timber.

N. FUMES

"Fumes" are minute solid particles generated by the condensation of vapors from solid matter after volatilization from the molten state, or generated by sublimation, distillation, calcination or chemical reaction, when these processes create air-borne particles.

O. HOUSEHOLD RUBBISH

"Household Rubbish" means combustible waste material and trash, including garden trash and prunings, normally accumulated by a family in a residence in the course of ordinary day to day living. See also Rule 101 BB. Waste.

P. INCINERATOR

"Incinerator" means any furnace or other closed fire chamber used for the burning of combustible refuse from which the products of combustion are directed through a chimney or flue. "Incinerator" also means any device constructed of nonflammable materials, including containers commonly known as burn barrels, for the purpose of burning therein trash, debris, and other flammable materials for volume reduction or destruction.

Q. MULTIPLE-CHAMBER INCINERATOR

"Multiple-chamber incinerator" is any article, machine, equipment, contrivance, structure or part of a structure used to dispose of combustible refuse by burning, consisting of three or more refractory lined combustion furnaces in series, physically separated by refractory walls, interconnected by gas passage ports or ducts and employing adequate design parameters necessary for maximum combustion of the material to be burned.

R. OIL-EFFLUENT WATER SEPARATOR

"Oil-effluent Water Separator" is any tank, box, sump or other container in which any petroleum or product thereof, floating on or entrained or contained in water entering such tank, box, sump or other container is physically separated and removed from such water prior to outfall, drainage, or recovery of such water.

S. OPEN OUTDOOR FIRE

"Open Outdoor Fire" means the burning or smoldering of any combustible material of any type outdoors in the open air, either inside or outside a fireproof container, where the products of combustion are not directed through a chimney or flue.

T. PARTICULATE MATTER

"Particulate matter (PM)" means any airborne finely divided material, except uncombined water, which exists as a solid or liquid at standard conditions (e.g., dust, smoke, mist, fumes or smog). "PM2.5" means particles with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers. "PM10" means particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers (including PM2.5).

U. PERSON

"Person" means any person, firm, association, organization, partnership, business trust, corporation, company contractor, supplier, installer, user, owner, or any Federal, State or local governmental agency or public district, or any officer, or employee thereof. "Person" also means the United States or its agencies, to the extent authorized by Federal Law.

V. PRESCRIBED BURNING

"Prescribed burning" means the planned application of fire to vegetation on lands selected in advance of such application, where any of the purposes of the burning are specified in the definition of agricultural burning as set forth in Health and Safety Code Section 39011.

W. PROCESS WEIGHT PER HOUR

"Process Weight" is the total weight of all materials introduced into any specific process which process may cause any discharge into the atmosphere. Solid fuels charged will be considered as part of the process weight, but liquid and gaseous fuels and combustion air will not. The "Process Weight per Hour" will be derived by dividing the total process weight by the number of hours in one cycle of operation from the beginning of any given process to the completion thereof, excluding any time during which the equipment is idle.

X. RANGE IMPROVEMENT BURNING

"Range Improvement Burning" means the use of open fires to remove vegetation for a wildlife, game or livestock habitat or for the initial establishment of an agricultural practice on previously uncultivated land.

Y. REGULATION

"Regulation" means one of the major subdivisions of the rules of the Great Basin Unified Air Pollution Control Districts.

Z. RULE

"Rule" means a rule of the Great Basin Unified Air Pollution Control District.

AA. SECTION

"Section" means the section of the Health and Safety Code of the State of California, as amended, effective January 1, 1976, unless some other statute is specifically mentioned.

AB. SOURCE OPERATION

"Source Operation" means the last operation preceding the emission of an air contaminant for which the operation both:

1. Results in the separation of the air contaminant from the process materials or in the conversion of the process materials into air contaminants, as in the case of combustion of fuel; and
2. Is not an air pollution abatement operation.

AC. WILDLAND VEGETATION MANAGEMENT BURNING

"Wildland vegetation management burning" means 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 (as defined in Title 14, California Code of Regulations, Section 1561.1), trees, grass, tule, or standing brush.

AD. NON-INDUSTRIAL WOOD WASTE

"Non-industrial wood waste" means wood waste from trees, vines and brush that is not produced as a result of an industrial process.

AE. OPEN BURN/OPEN DETONATION OPERATIONS (OB/OD)

"Open burn/open detonation operations" refers to the treatment of propellants, explosives, and pyrotechnics (PEP) at military bases. During "open burning," raw material mixes with air and burns at temperatures which can exceed 3500 degrees Kelvin and pressures greater than 1000 pounds per square inch absolute. The open burning process entails a rapid oxidation of some fuel with a heat release and formation of combustion products. The burning of waste munitions converts the solid materials to gaseous products and particulate matter. Open detonation produces temperatures and pressures that are considerably greater than open burning. Detonation is an explosion in which a chemical transformation passes through the material faster than the speed of sound.

AF. "Air quality" means the characteristics of the ambient air as indicated by state ambient air quality standards which have been adopted by the state board pursuant to section 39606 of the Health and Safety Code and by National Ambient Air Quality Standards which have been established pursuant to sections 108 and 109 of the federal Clean Air Act pertaining to criteria pollutants and section 169A of the federal Clean Air Act pertaining to visibility.

- AG. "Ambient air" means that portion of the atmosphere, external to buildings, to which the general public has access.
- AH. "CARB," "ARB" or "state board" means the California Air Resources Board.
- AI. "Burn plan" means an operational plan for managing a specific fire to achieve resource benefits and specific management objectives. The plan includes, at a minimum, the project objectives, contingency responses for when the fire is out of prescription with the smoke management plan, the fire prescription (including smoke management components), and a description of the personnel, organization, and equipment.
- AJ. "Burn project" means an active or planned prescribed burn or a naturally ignited wildland fire managed for resource benefits.
- AK. "Class I Area" means a mandatory visibility protection area designated pursuant to section 169A of the federal Clean Air Act.
- AL. "Fire protection agency" means any agency with the responsibility and authority to protect people, property, and the environment from fire, and having jurisdiction within a district or region.
- AM. "Land manager" means any federal, state, local, or private entity that administers, directs, oversees, or controls the use of public or private land, including the application of fire to the land.
- AN. "National Ambient Air Quality Standards (NAAQS)" mean standards promulgated by the United States Environmental Protection Agency that specify the maximum acceptable concentrations of pollutants in the ambient air to protect public health with an adequate margin of safety, and to protect public welfare from any known or anticipated adverse effects of such pollutants (e.g., visibility impairment, soiling, harm to wildlife or vegetation, materials damage, etc.) in the ambient air.
- AO. "No-burn day" means any day on which agricultural burning, including prescribed burning, is prohibited by the state board, or the Air Pollution Control Officer.
- AP. "Open burning in agricultural operations in the growing of crops or raising of fowl or animals" means:
1. The burning in the open of materials produced wholly from operations in the growing and harvesting of crops or raising of fowl or animals for the primary purpose of making a profit, of providing a livelihood, or of conducting agricultural research or instruction by an educational institution.
 2. In connection with operations qualifying under paragraph 1:
 - a. The burning of grass and weeds in or adjacent to fields in cultivation or being prepared for cultivation.

- b. The burning of materials not produced wholly from such operations, but which are intimately related to the growing or harvesting of crops and which are used in the field, except as prohibited by district regulations. Examples are trays for drying raisins, date palm protection paper, and fertilizer and pesticide sacks or containers, where the sacks or containers are emptied in the field.
- AQ. "Prescribed fire" means any fire ignited by management actions to meet specific objectives, and includes naturally-ignited wildland fires managed for resource benefits.
- AR. "Smoke Management Plan" means a document prepared for each prescribed fire by land managers or fire managers that provides the information and procedures required in Rule 411.
- AS. "Smoke sensitive areas" are populated areas and other areas where the Air Pollution Control Officer determines that smoke and air pollutants can adversely affect public health or welfare. Such areas can include, but are not limited to, towns and villages, campgrounds, trails, populated recreational areas, hospitals, nursing homes, schools, roads, airports, public events, shopping centers, and mandatory Class I areas.
- AT. "State ambient air quality standards" means specified concentrations and durations of air pollutants which reflect the relationship between the intensity and composition of air pollution to undesirable effects, as established by the state board pursuant to Health and Safety Code section 39606.
- AU. "Wildfire" means an unwanted wildland fire.
- AV. "Wildland" means an area where development is generally limited to roads, railroads, power lines, and widely scattered structures. Such land is not cultivated (i.e., the soil is disturbed less frequently than once in 10 years), is not fallow, and is not in the United States Department of Agriculture (USDA) Conservation Reserve Program. The land may be neglected altogether or managed for such purposes as wood or forage production, wildlife, recreation, wetlands, or protective plant cover. "Wildland" also means any lands that are contiguous to lands classified as a state responsibility area if wildland fuel accumulation is such that a wildland fire occurring on these lands would pose a threat to the adjacent state responsibility area. For California Department of Forestry (CDF) only, "Wildland" as specified in California Public Resources Code (PRC) section 4464(a) means any land that is classified as a state responsibility area pursuant to article 3 (commencing with section 4125) of chapter 1, part 2 of division 4 and includes any such land having a plant cover consisting principally of grasses, forbs, or shrubs that are valuable for forage.
- AW. "Wildland fire" means any non-structural fire, other than prescribed fire, that occurs in the wildland. For CDF only, "wildland fire" as specified in PRC section 4464(c) means any uncontrolled fire burning on wildland.
- AX. "Wildland/urban interface" means the line, area, or zone where structures and other human development meet or intermingle with the wildland.
- AY. "Approved ignition device" means an instrument or material that will ignite open fires without the production of black smoke by the ignition device, as approved by the APCO.

- AZ. "Burn Barrel" means a metal container used to hold combustible or flammable waste materials so that they can be ignited outdoors for the purpose of disposal.
- BA. "Natural vegetation" means all plants, including but not limited to grasses, forbs, trees, shrubs, flowers, or vines that grow in the wild or under cultivation. Natural vegetation excludes vegetative materials that have been processed, treated or preserved with chemicals for subsequent human or animal use, including but not limited to chemically-treated lumber, wood products or paper products.
- BB. "Waste" for the purpose of District Rules 406 and 407, means all discarded putrescible and non-putrescible solid, semisolid, and liquid materials, including but not limited to petroleum products and petroleum wastes; construction and demolition debris; coated wire; tires; tar; tarpaper; wood waste; processed or treated wood and wood products; metals; motor vehicle bodies and parts; rubber; synthetics; plastics, including plastic film, twine and pipe; fiberglass; styrofoam; garbage; trash; refuse; rubbish; disposable diapers; ashes; glass; industrial wastes; manufactured products; equipment; instruments; utensils; appliances; furniture; cloth; rags; paper or paper products; cardboard; boxes; crates; excelsior; offal; swill; carcass of a dead animal; manure; human or animal parts or wastes, including blood; fecal- and food-contaminated material. For the purpose of District Rule 406, dry, natural vegetation waste from yard maintenance is excluded from the meaning of "waste," if the material is reasonably free of dirt, soil and surface moisture.

[Intentionally left blank.]

RULE 405. EXCEPTIONS

Adopted: 09/05/74 Revised: 03/10/76, 05/08/96, 11/07/01, 07/7/05

Rules 400, 404-A and 404-B do not apply to:

- A. Fire set by or permitted by a public officer if such fire is set or permission given in the performance of an official duty of such officer, and such fire, in the opinion of such officer, is necessary:
 - 1. For the purpose of the prevention of a fire hazard which cannot be abated by other means, or
 - 2. The instruction of public employees in the methods of fighting fire.
- B. Fires set pursuant to a permit on property used for industrial purposes for the purpose of instruction of employees in methods of fighting fire.
- C. [Deleted: 07/07/05]
- D. The use of an orchard, field crop, or citrus grove heater which does not produce unconsumed, solid carbonaceous matter at a rate in excess of that allowed by State law.
- E. [Deleted: 07/07/05]
- F. The treatment of waste propellants, explosives and pyrotechnics (PEP) in open burn/open detonation operations on military bases for operations approved in accordance with a burn plan as required in Rule 432.
- G. Burning of materials for the purpose of creating special effects during production of commercial or educational films, videos or photographs.
- H. Disposal of contraband (confiscated controlled substances) by burning.
- I. Recreational or ceremonial fires contained in a fireplace, barbeque, or fire pit.
- J. A fire set for the purpose of eliminating a public health hazard that cannot be abated by any other practical means.

[Intentionally left blank.]

RULE 406. OPEN OUTDOOR FIRES

Adopted: 01/21/76 Revised: 10/01/76, 11/04/92, 11/07/01, 09/24/03

A person shall not burn any combustible refuse or waste in any open outdoor fire within the boundaries of the Great Basin Unified Air Pollution Control District, except:

- A. When such fire is set or permission for such fire is given in the performance of the official duty of any public officer, and such fire in the opinion of such officer is necessary:
 - 1. For the purpose of the prevention of a fire hazard which cannot be abated by other means, or
 - 2. The instruction of public employees, or public volunteers under the supervision of a public officer, in the methods of fighting fire.
- B. When such fire is set pursuant to permit on property used for industrial purposes for the purpose of instruction of employees in methods of fighting fires.
- C. Agricultural fires necessary to maintain and continue an agricultural operation set or permitted by a fire official having jurisdiction in the performance of official duty for the purposes of:
 - 1. Control and disposal of agricultural wastes.
 - 2. Range improvement burning.
 - 3. Forest management burning.
 - 4. Fires set in the course of any agricultural operation in the growing of crops, or raising of fowls or animals.
 - 5. Abatement of an immediate health hazard.
 - 6. Wildland vegetation management burning.
- D. On burn days as declared by the State Air Resources Board and pursuant to a valid burn permit as authorized by the Great Basin Unified Air Pollution Control District, fires for the disposal of the following material in the described manner originating from a single or two family dwelling on its premises:
 - 1. Dry non-glossy paper and cardboard, ignited using an approved ignition device, in geographic areas granted a temporary exemption pursuant to Title 17, § 93113(e) of the California Code of Regulations.
 - 2. Dry natural vegetation waste reasonably free of dirt, soil and visible surface moisture by ignition using an approved ignition device.
- E. Fires used only for the cooking of food for human beings or for recreational purposes.

- F. Fires, on burn days as declared by the State Air Resources Board and pursuant to a valid burn permit as authorized by the Great Basin Unified Air Pollution Control District, for the clearing of rights-of-way by a public entity or public utility where access by chipping equipment is not available by existing means or for reservoir maintenance.
- G. Except in case of emergency, permits for the setting of a fire or fires permitted by this rule shall be granted by the Air Pollution Control Officer, or by the public fire official having jurisdiction over the proposed burn location.
- H. When such fire is set for the purpose of burning non-industrial wood waste pursuant to a valid permit as authorized by the Great Basin Unified Air Pollution Control District under District Rule 412.
- I. Burning of materials for the purpose of creating special effects during production of commercial or educational films, videos or photographs. Such burn events cannot pose a public nuisance or health threat, or cause an exceedance of National or State ambient air quality standards.
 - 1. Any person seeking to set fires under this provision shall obtain a valid burn permit from the local fire protection agency.
 - 2. To gain an exemption, the following information shall be submitted to the District in writing at least 10 days in advance of the burn:
 - a. Location of proposed burn,
 - b. Date and approximate time of proposed burn,
 - c. Type and volume of material to be burned, and
 - d. Expected duration of proposed burn.
 - 3. The burner shall notify the APCO the day before each burn.
 - 4. Permission to burn on other than a permissive burn day shall be subject to written approval by the APCO. If the APCO grants written approval, such approval shall be available at the burn location for inspection by District personnel.
- J. Disposal of contraband (confiscated controlled substances) by burning. Such fire must be set and tended by official law enforcement personnel and must have been deemed not disposable by any other means by such officials. Prior to such burns, the District shall be informed of the place, date and time of the burn, and type and quantity of contraband to be disposed.
 - 1. Any person seeking to set fires under this provision shall obtain a valid burn permit from the local fire protection agency.
 - 2. The burner shall notify the APCO the day before each burn.
 - 3. Permission to burn on other than a permissive burn day shall be subject to written approval by the APCO. If the APCO grants written approval, such

approval shall be available at the burn location for inspection by District personnel.

- K. Recreational or ceremonial fires contained in a fireplace, barbeque, or fire pit, provided material burned is free of household, municipal, and industrial waste, such as: tires, tar, plastics and wet wood.
- L. A fire set for the purpose of eliminating a public health hazard that cannot be abated by any other practical means.
 - 1. Any person seeking to set fires under this provision shall obtain a valid burn permit from the local fire protection agency.
 - 2. To gain an exemption, the following information shall be submitted to the District in writing at least 10 days in advance of the burn:
 - a. Written recommendation for such fire by a public health officer,
 - b. Location of proposed burn,
 - c. Date and approximate time of proposed burn,
 - d. Type and volume of material to be burned, and
 - e. Expected duration of proposed burn.
 - 3. The burner shall notify the APCO the day before each burn.
 - 4. Permission to burn on other than a permissive burn day shall be subject to written approval by the APCO. If the APCO grants written approval, such approval shall be available at the burn location for inspection by District personnel.

[Intentionally left blank.]

RULE 408. OPEN BURNING IN AGRICULTURAL OPERATIONS OR DISEASE OR PEST PREVENTION

Adopted: 09/05/74 Revised: 03/10/76, 06/25/79, 07/01/92, 11/04/92, 11/07/01

- A. No person shall burn agricultural wastes on "no burn" days as announced by the State Air Resources Board for the Counties of Inyo, Mono, and Alpine or when prohibited by the Air Pollution Control Officer.
- B. Such burning when authorized shall conform to the following criteria:
1. Material to be burned shall be as dry as feasible prior to burning, and shall be free from combustible impurities such as tires, tar paper, rubbish, plastics, demolition or construction debris, and shall be reasonably free of dirt, soil, and visible surface moisture.
 2. Trees and branches over two inches in diameter shall have been dried for at least 10 days prior to burning.
 3. Branches under two inches in diameter and prunings shall have been dried for at least 1 week prior to burning.
 4. Wastes from field crops that are cut in a green condition shall have been dried for at least 1 week prior to burning.
 5. Exceptions to the foregoing may be made by the fire authority which issues the permits to burn, after notification to the Air Pollution Control Officer, and if the material to be burned is diseased or insect infested and there would be irreparable damage if the foregoing standards were rigidly enforced.
 6. Material to be burned shall be so arranged as to burn with a minimum of smoke.
 7. All burning shall conform to the applicable jurisdictional fire code(s).
 8. Rice, barley, oat, and wheat straw shall be ignited only by stripfiring into the wind or by backfiring, except under a special permit of the district issued when and where extreme fire hazards are declared by a public fire protection agency to exist, or where crops are determined by the district not to lend themselves to these techniques.
- C. The use of oil or tires in connection with the ignition or burning of agricultural wastes, roadsides, ditch banks, or patches of vegetation is prohibited.
- D. No agricultural wastes shall be burned without a permit issued by a fire protection authority having jurisdiction over the proposed burn location. As a condition to the issuance of a permit, each applicant shall provide the information required by the issuing agency on forms prepared jointly by said agency and the District. The permit may place a limit upon the amount of materials to be burned in any one day and the hours of the day during which time the material may be burned. Further, the form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board

or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'

- E. Burning shall be curtailed when smoke is drifting into a populated area or creating a public nuisance.
- F. Burning hours shall be set so that no field crop burning shall commence before 10:00 a.m. or after 5:00 p.m. of any day, unless the Air Pollution Control Officer determines that local conditions indicate that other hours are appropriate.

[Intentionally left blank.]

RULE 409. RANGE IMPROVEMENT BURNING

Adopted: 03/10/76 Revised: 10/01/76, 07/01/92, 11/07/01

- A. No range improvement burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency having jurisdiction over the proposed burn location. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. Range improvement burning, when permitted, shall comply with all the provisions of this rule and all the provisions for wildland vegetation management burning in wildland and wildland/urban interface areas under District Rule 411.
- C. Range improvement burning when permitted shall conform to the following criteria:
 - 1. Where economically and technically feasible, brush shall be treated by chemical or mechanical means at least 6 months prior to a proposed burn, to kill or uproot the brush in order to insure rapid combustion.
 - 2. Unwanted trees over 6" in diameter in the burn area or those not effectively treated at the time of the brush treatment shall be felled at least 3 months prior to the burn, but a longer time may be required where conditions warrant.

[Intentionally left blank.]

RULE 410. FOREST MANAGEMENT BURNING

Adopted: 09/05/74 Revised: 03/10/76, 07/01/92, 11/07/01

- A. No forest management burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency having jurisdiction over the proposed burn locations. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. Forest management burning, when permitted, shall comply with all the provisions of this rule and all the provisions for wildland vegetation management burning in wildland and wildland/urban interface areas under District Rule 411.
- C. Forest management burning, when permitted, shall conform to the following criteria:
 - 1. Waste shall be dried sufficiently to insure rapid combustion.
 - 2. Where possible, unless good management dictates otherwise, waste to be burned shall be windrowed or piled so as to burn with a minimum of smoke.

[Intentionally left blank.]

RULE 411. WILDLAND VEGETATION MANAGEMENT BURNING ~~IN WILDLAND AND~~
~~WILDLAND/URBAN INTERFACE AREAS~~

Adopted: 09/05/74 Revised: 03/10/76, 07/01/92, 11/07/01, 03/05/20

- A. No wildland vegetation management burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency or district having jurisdiction over the proposed burn locations. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural or prescribed burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. No person shall conduct wildland vegetation management burning on "no--burn" days as announced ~~daily~~ by the State Air Resources Board for the Inyo, Mono and Alpine Counties or when such burning is prohibited by the Air Pollution Control Officer except when the Air Pollution Control Officer has authorized, by special permit pursuant to Section 80120, of Title 17 of the California Code of Regulations (CCR), Title 17, agricultural or prescribed burning on days designated by the State Air Resources Board as no-burn days because the denial of such permit would threaten imminent and substantial economic loss. In authorizing such burning the Air Pollution Control Officer ~~may~~ limit the amount of acreage which can be burned in any one day and only authorize burning that is not forecasted to cause or significantly contribute to exceedances of the ambient air quality standards, when downwind populated areas are forecasted by the State Air Resources Board to achieve the ambient air quality standards. Every applicant for a permit to burn on a no-burn day agricultural waste pursuant to this section shall provide information in writing to the Air Pollution Control Officer for evaluation, stating why the denial of such a permit would threaten imminent and substantial economic loss.
- C. Wildland vegetation management burning, when permitted, shall conform to the following criteria:
1. The land manager, or ~~his/her~~their designee, shall annually or seasonally submit a potential list of burn projects to the Air Pollution Control Officer, including areas considered for potential naturally-ignited wildland fires managed for resource benefits, with updates as they occur.
 2. A Smoke Management Plan shall be submitted Ffor all burn projects greater than 1 acre in size or estimated to produce more than 1 ton of particulate matter, ~~the~~tThe land manager, or ~~his/her~~their designee, shall submit ~~a the~~ smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing at a minimum, the following information:
 - a. Location, types, and amounts of material to be burned;
 - b. Expected duration of the fire from ignition to extinction;
 - c. Identification of responsible personnel, including contact information~~telephone contacts~~;
 - d. Identification and location of all smoke sensitive areas; and

- e. Procedures for public notification and education, including messaging, appropriate signage at burn sites, and for reporting of public smoke complaints.
3. For burn projects greater than 100 acres in size or estimated to produce more than 10 tons of particulate matter ~~contain, at a minimum,~~ the land manager, or ~~his/her~~their designee, shall submit a smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing all the information in subsection 2 and at a minimum the following additional information:
- a. Identification of meteorological conditions necessary for burning. The plan should include projections of where the smoke from burns is expected to travel.
 - b. The smoke management criteria the land manager or ~~his/her~~their designee will use for making burn ignition decisions.
 - c. Discussion of the actions that will be taken to minimize smoke impacts. Projections, including a map, of where the smoke from burns are expected to travel, both day and night.
 - d. Specific mitigations and contingency actions (such as fire suppression or containment) that will be taken when identified thresholds or management action points if smoke impacts occur or meteorological conditions deviate from those specified in the smoke management plan.
 - e. An evaluation of considered alternatives to burning ~~considered; if an analysis of alternatives has been prepared as part of the environmental documentation required for the burn project pursuant to the National Environmental Policy Act (NEPA) or the California Environmental Quality Act (CEQA), as applicable, the analysis shall be attached to the smoke management plan in satisfaction of this requirement.~~
 - f. Discussion of pPublic notification procedures and methods.
4. If smoke may impact smoke sensitive areas, the land manager, or ~~his/her~~their designee, shall include in the smoke management plan; public outreach and messaging, smoke forecasting, visual monitoring, ambient particulate matter monitoring or other monitoring or mitigation measures approved by the ~~district~~District, as required by the Air Pollution Control Officer for the following burn projects:
- a. Projects greater than 250 acres;
 - b. Projects that will continue burning or producing smoke overnight;
 - c. Projects conducted near smoke sensitive areas; or
 - d. As otherwise required by the Air Pollution Control Officer.

5. Daily burn authorization from the District is required for all burn projects requiring a Smoke Management Plan to minimize smoke impacts to smoke sensitive areas and avoid cumulative smoke impacts. The land manager shall request burn authorization via a method approved by the District at least 3 days in advance of the planned burn and shall specify the amount, timing and location of the burning to be completed. The District will issue daily burn authorizations at least 24-hours prior to the burn. The District's burn authorization may be contingent upon, or subject to change based on California Air Resources Board (ARB) burn day determination, air quality conditions, meteorological conditions, or other conditions affecting smoke dispersion. The District shall consider the following factors in reviewing a daily burn request:

- a. ARB burn day determination or forecast;
- b. Current and forecasted ambient air quality conditions;
- c. Forecasted meteorological conditions, including wind speeds and directions at the surface and aloft, and atmospheric stability;
- d. Types and amounts of materials to be burned;
- e. Location and timing of materials to be burned;
- f. Locations of smoke sensitive areas; and
- g. Smoke from all burning activities, including burning in neighboring air districts or regions which may affect the District or region.

5.6. For multi-dayany burns which may impact smoke sensitive areas, the land manager or his/her~~their~~ designee, shall coordinate with and provide daily notification to the District and the ARB to affirm that the burn project remains within the conditions specified in the smoke management plan, or to determine whether contingency actions are necessary.

6.7. For any natural ignition that occurs on a no-burn day, the initial "go/no-go" decision to manage the fire for resource benefit will be a "no-go" unless:

- a. After consultation with the ~~district~~District, the ~~district~~District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
- b. For periods of less than 24 hours, a reasonable effort has been made to contact the ~~district~~District, or if the ~~district~~District is not available, the ARB;
- c. After 24 hours, the District has been contacted, or if the District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit.

A "no-go" decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

8. For any unplanned or naturally-ignited wildland fire managed for resource benefits that are expected to exceed 10 acres in size, the land manager or

his/her/their designee, shall submit a smoke management plan to the District for review and approval within 72 hours of the start of a fire. In addition to the requirements for a planned ignition, Smoke management plans for unplanned or naturally-ignited wildland fire managed for resource benefits shall include:

- a. Incorporation of air quality management considerations in fire management documents and decisions.
- b. Adaptive management based on forecasted and monitored smoke concentrations to match emissions to dispersion opportunities. The District may require limiting or postponing ignitions to avoid cumulative smoke impacts, prevent public nuisance, and prevent violations of the ambient air quality standards.
- c. Public notification and messaging methods.
- d. Additional forecasting, monitoring, and mitigation measures as appropriate

7.9. The land manager or his/her/their designee, shall ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and prior to ignition.

8.10. For burn projects greater than 250 acres, the land manager or his/her/their designee shall perform a post-burn smoke management evaluation.

9.11. Vegetation shall be in a condition that will minimize the smoke emitted during combustion when feasible, considering fire safety and other factors.

10.12. Material to be burned ~~shall~~should be piled where possible, unless good silvicultural practices or ecological goals dictate otherwise. Piled material shall be prepared so that it will burn with a minimum of smoke.

~~11. Piled material to be burned shall be prepared so that it will burn with a minimum of smoke.~~

12.13. If the burn is to be done primarily for improvement of land for wildlife and game habitat, the burn plan applicant shall file with the District a statement from the Department of Fish and Game certifying that the burn is desirable and proper, if the burn is to be done primarily for improvement of land for wildlife and game habitat. The Department of Fish and Game may specify the amount of brush treatment required, along with any other conditions it deems appropriate.

13.14. Burn plans shall limit or postpone burning, or require mitigation, when the meteorological conditions and smoke impacts may ~~could otherwise~~ cause ~~smoke to create~~ or contribute to an exceedance of a state or federal ambient air quality standard or cause a public nuisance.

~~14.15.~~ Vegetation to be burned shall be free of tires, rubbish, tar paper or construction debris, and reasonably free of dirt and soil.

~~15.16.~~ The material to be burned shall be ignited only by devices approved by the California Department of Forestry and Fire Protection, or the local fire protection agency, and ignition shall be as rapid as practicable within applicable fire control restrictions.

~~16. Prescribed burning shall not be allowed on Sundays, the last Saturday in April, or legal holidays, except for multi-day burns that cannot be reasonably treated on other days.~~

17. All burning shall conform to the applicable jurisdictional fire code(s).

18. Burning shall be managed to minimize smoke impacts to smoke sensitive areas.
~~curtailed when smoke is drifting into a populated area or creating a public nuisance.~~

D. The total amount of material burned in any one day, may be limited or postponed by the District, taking into consideration matters which would affect the ambient air quality of the District including current and forecasted air quality conditions; meteorological conditions; the types and amounts of material to be burned; the location and timing of material to be burned; the location of smoke sensitive areas; and the cumulative smoke impacts from all burning activities within and outside the District.

[Intentionally left blank.]

RULE 412. OPEN BURNING OF NON-INDUSTRIAL WOOD WASTE AT CITY OR COUNTY DISPOSAL SITES

Adopted: 09/05/74 Revised: 02/09/81, 11/04/92

- A. No person shall burn non-industrial wood waste on "no-burn" days as announced by the State Air Resources Board for the Counties of Inyo, Mono, and Alpine or when prohibited by the Air Pollution Control Officer.
- B. Burning of non-industrial wood waste at city or county disposal sites shall be restricted to sites above 1,500 feet (above mean sea level), that have been approved for such burning by the Air Pollution Control Officer (APCO) and the California Air Resources Board. Approval shall be based upon the submittal of written documentation for each site which shall include:
 - 1. A copy of the resolution by the applicable city council or county board of supervisors declaring their intention to allow burning at designated sites.
 - 2. The estimated tonnage and type of material to be burned at each site with the estimated criteria pollutant emissions, broken down by month for a one year period and an analysis of air quality trends showing that the proposed burns will not prevent the achievement or maintenance of the ambient air quality standards.
 - 3. Location and elevation of the sites to be used for burning.
 - 4. A copy of a written statement by the owner of the land on which the disposal site is located approving the burn on such land.
 - 5. Written approval of the fire protection agency having authority over the proposed burn site.
 - 6. A statement explaining why burning at the disposal site will not create a nuisance. This shall include consideration for the site's proximity to population centers and the prevailing wind pattern.
 - 7. A statement indicating who is responsible to verify that only non-industrial wood waste is burned and how often inspections shall be made at each site.
- C. Such burning when authorized shall conform to the following criteria:
 - 1. Material to be burned shall be as dry as feasible prior to burning, and shall be free from combustible impurities such as tires, tar paper, rubbish, plastics, demolition or construction debris, and shall be reasonably free of dirt, soil, and visible surface moisture.
 - 2. Trees and branches over two inches in diameter shall have been dried for at least 10 days prior to burning.
 - 3. Branches under two inches in diameter and prunings shall have been dried for at least 1 week prior to burning.

4. Exceptions to the foregoing may be made by the fire authority which issues the permits to burn, after notification to the Air Pollution Control Officer, and if the material to be burned is diseased or insect infested and there would be irreparable damage if the foregoing standards were rigidly enforced.
 5. Material to be burned shall be so arranged as to burn with a minimum of smoke.
 6. All burning shall conform to the applicable jurisdictional fire code(s).
- D. The use of oil or tires in connection with the ignition or burning of non-industrial wood wastes is prohibited.
- E. No non-industrial wood waste shall be burned without a permit issued by a fire protection authority having jurisdiction over the proposed burn location. As a condition to the issuance of a permit, each applicant shall provide the information required by the issuing agency on forms prepared jointly by said agency and the District. The permit may place a limit upon the amount of materials to be burned in any one day and the hours of the day during which time the material may be burned. Further, the form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- F. Burning shall be curtailed when smoke is drifting into a populated area or creating a public nuisance. If smoke from a particular site repeatedly drifts into a populated area or causes a nuisance, the APCO will revoke approval for that site.
- G. The total amount of material burned in any one day, may be limited by the District, taking into consideration matters which would affect the ambient air quality of the District.

[Intentionally left blank.]

Attachment B

Example Form

for Smoke Management Plan

GREAT BASIN UNIFIED APCD APPLICATION TO APPROVE SMOKE MANAGEMENT PLAN

In accordance with the Smoke Management Program for the Great Basin Unified Air Pollution Control District (Air District), this Smoke Management Plan (SMP) serves as an application for SMP approval to comply with Air District Rule 411.C. This SMP application is to be completed by the applicant and submitted to the Air District for review and approval at least 30 days prior to performing the proposed prescribed burn. This SMP application consists of a Project Description page and two sections – A and B. **ALL APPLICANTS MUST COMPLETE THE PROJECT DESCRIPTION PAGE (page 3).** Both sections A and B of the SMP (**pages 5-9**) may need to be completed depending on the burn's potential to impact smoke sensitive areas and the size of the burn. Once approved by the Air District, this SMP serves as a conditional approval to burn.

General Information and Requirements regarding this SMP are provided on **pages 1 and 2**. Terms used in this form have the same meaning as those defined in the Air District's Rule 101 or the California Code of Regulations (CCR), Title 17, Section 80101. Where differences occur, the Air District's definitions apply. **Emission Factors** to assist with calculating burn particulate matter emissions are provided on **pages 11 and 12**. Contact the Air District at (760) 872-8211 if you have questions or need assistance with making these calculations.

The **District Review (page 2)** is for Air District use only, but must be kept intact with the Project Description. The **Project Description** section (**pages 3 and 4**) requests general information and identifies conditions for all prescribed burn projects. It identifies the applicant and relevant contact information, who the land owner is, the project name, project location, burn size, purpose of the burn, type of fuel to be burned, and estimated emissions from the burn. It provides a checklist of additional sections of the SMP that may be filled out and attached. Finally, it requests the preparer's signature, the name of the applicant or authorized representative, and the applicant or authorized representative's signature.

Section A (pages 5-7) must be completed and attached to the Project Description page if the burn has the potential to result in impacts to smoke sensitive areas. Smoke sensitive areas are defined as "populated areas and other areas where the Air District determines that smoke and air pollutants can adversely affect public health or welfare." Such areas can include, but are not limited to, towns and villages, campgrounds, trails, populated recreational areas, hospitals, nursing homes, schools, roads, airports, public events, shopping centers, and Class I Areas (areas that are mandatory visibility protection areas designated pursuant to section 169A of the federal Clean Air Act). Class I Areas in, or near, the Great Unified APCD include; South Sierra Wilderness, John Muir Wilderness, Ansel Adams Wilderness, Mokelumne Wilderness, Yosemite National Park, Kings Canyon National Park, and Sequoia National Park.

Section B (pages 8 and 9) must be completed and attached to the Project Description page if the burn will be greater than 100 acres or will produce more than ten tons of particulate matter. Section B identifies meteorological conditions necessary for ignition, contingency actions that will be taken if smoke impacts begin to occur from the burn, and information on consideration and use of alternatives to burning. A **Post-Burn Evaluation** form is provided on **page 10**. This form is to be used for burns greater than 250 acres or for burns that result in impacts to smoke sensitive areas. It should be filled out after the burn, as appropriate.

Information may need to be extracted from the project burn plan (if available) to supplement the SMP. Air District review of the burn plan is for informational purposes only. When the burn plan is reviewed, the Air District assumes no approval authority or liability for approving the burn plan. The applicant is responsible for assuring firefighter and public safety, which is not the intent of the information included on this form.

General Information and Requirements

SMP Conditions Must Be Met on the Day of the Burn (CCR § 80160(j))

The land manager or his/her designee conducting a prescribed burn is required to ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and prior to ignition. Ignition of a burn project will not occur unless the Air District has authorized the burn for the day of the burn. [Note: CCR § 80120(e) and Air District Rule 411.B.2 provide that the Air District may, by special permit, authorize agricultural burning, including prescribed burning, on days designated by the ARB as no-burn days if the denial of such permit would threaten imminent and substantial economic loss.]

Conditions of Vegetative Material to be Burned (CCR §§ 80160 (m – p))

Material should be:

- ◆ in a condition that will minimize the smoke emitted during combustion when feasible, considering fire safety and other factors
- ◆ piled where possible, unless good silvicultural practices or ecological goals dictate otherwise
- ◆ prepared so that it will burn with a minimum of smoke

Description of Burn Types

Forest Management Burning is the use of open fires, as part of a forest management practice, to remove forest debris or for forest management practices which include timber operations, silvicultural practices, or forest protection practices.

Range Improvement Burning is the use of outdoor fires to:

- ◆ remove vegetation for wildlife or game habitat
- ◆ remove vegetation for livestock habitat
- ◆ remove vegetation for the initial establishment of an agricultural practice on previously uncultivated land

Wildland Vegetation Management Burning is the use of prescribed burning conducted by a public agency, or through a cooperative agreement with a private manager or contract involving a public agency, to burn land predominantly covered with chaparral (as defined in Title 14, CCR §1561.1), trees, grass, or standing brush.

Determination of Smoke Sensitive Areas

Smoke sensitive areas are defined as “populated areas and other areas where the Air Pollution Control Officer (APCO) determines that smoke and air pollutants can adversely affect public health or welfare.” Such areas can include, but are not limited to, towns and villages, campgrounds, trails, populated recreational areas, hospitals, nursing homes, schools, roads, airports, public events, shopping centers, and Class I Areas (areas that are mandatory visibility protection areas designated pursuant to section 169A of the federal Clean Air Act. If a burn is near a populated area, has potential for substantial emissions, has a long duration, or has the potential for poor smoke dispersion, a smoke sensitive area could be impacted and Section A of the SMP should be completed. Burners may obtain Air District assistance in determining if Section A should be completed.

Procedures to Report Public Smoke Complaints to the Air District (CCR § 80160(l))

1. The applicant shall immediately report any air quality smoke complaints received about this burn project to the Air District. A phone call to the District during normal seasonal business hours will suffice. During non-business hours a fax or voicemail message will suffice [(760) 872-6109 (fax), 872-8211 (voice)].
2. The complaint report shall include the following: the location of the smoke impact, a short description of the smoke behavior including wind direction and speed, visibility, and public safety impacts if available

from the complainant.

3. The applicant shall inform the complainant that he or she may also contact the District directly and shall provide the District name, telephone number and address.
4. The applicant shall, in coordination with the Air District, seek resolution for all complaints, as necessary.

Natural Ignition on a No-burn Day (CCR § 80160(h))

When a natural ignition occurs on a no-burn day, the initial “go/no-go” decision to manage the fire for resource benefit will be a “no-go” unless:

1. After consultation with your Air District, the Air District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
2. For periods of less than 24 hours, a reasonable effort has been made to contact the Air District, or if the Air District is not available, the Air Resources Board (ARB); or
3. After 24 hours, the Air District has been contacted, or if the Air District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit. A “no-go” decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

~~Holidays and Sundays Are No Burn Days for Prescribed Burning in the Great Basin Unified APCD (District Rule 411.C.17)~~

~~Prescribed burning is not allowed on Sundays, the last Saturday in April, or legal holidays, except for multi-day burns that cannot be reasonably treated on other days.~~

FOR GREAT BASIN UAPCD REVIEW **(For District Use Only)**

____ I have reviewed and approved this SMP as a conditional approval, which expires on _____.

____ This burn project is greater than 250 acres and/or is a multi-day burn which requires ARB consultation prior to final approval pursuant to CCR § 80160(g)).

Date ARB Notified: _____ Date ARB approval received: _____

Smoke from this fire is expected to impact the following non-attainment or maintenance areas:

Conditions of Approval:

Signature: _____ Date: _____

Name: _____

SMP Project Description (Complete This Page for ALL PRESCRIBED BURNS)¹

1.1 Project Name: _____	Project Location: Report at least one of the following location descriptions and attach a map indicating the project location. 1.8a Legal: T ___ R ___ S ___ M&B ___ 1.8b Lat/Long: Latitude ___ (deg.) ___ (min) ___ (sec) Longitude ___ (deg.) ___ (min) ___ (sec) 1.8c UTM: Zone: ___ N ___ m, E ___ m
1.2 Applicant Name: _____ 1.3 Applicant Address: Street: _____ City: _____ State: _____ Zip: _____	1.9 Project Elevation (feet above msl) Upper: _____ Lower: _____ 1.10 Land Owner Name: _____ Street: _____ City: _____ State: _____ Zip: _____
1.4 Applicant/Field Contact: _____	
1.5 24-hour Phone/Pager: _____	
1.6 Project Location (Counties): _____	
1.7 Nearest Town(s): _____	

- 1.11 Anticipated Time of Year for Burn (Month/Year): _____
- 1.12a Is the Primary Purpose of the Burn for Fire Hazard Reduction? _____
- 1.12b Burn Type (Check one): _____ Forest Management: _____ Range Improvement
 _____ Wildland Vegetation Management _____ Natural Ignition
- 1.13 For Range Improvement Burns Check Vegetation Management Objective:
 _____ Wildlife or Game Habitat Improvement _____ Livestock Habitat Improvement
 _____ Initial Establishment of an Agricultural Practice on Previously Uncultivated Land
- 1.14 Vegetation Type (Percentage): _____ Brush _____ Grass _____ Timber Litter _____ Timber Slash
 _____ Other (Describe): _____
- 1.15 Vegetation Condition: _____ Machine Pile Burn _____ Hand Pile Burn _____ Understory
 _____ Landing Pile Burn _____ Broadcast
- 1.16 Project Area: _____ (acres)
- 1.17 Number of Piles: _____
- 1.18 Average Pile Size: _____
- 1.19 Total Project Fuel Loading: _____ (tons vegetation)
- 1.20 Particulate Matter Emissions: _____ (tons PM10)
 (Use Emissions Factors Tables on pages 7-8 for assistance with emissions calculation)
- 1.21 Emission Factor Table Used or
 EPA-Approved Calculation Method: _____
- 1.22 Preferred Ignition Hours for the Fire: _____
- 1.22 Expected Burn Duration (ignition to complete extinction):
 Total Time: _____ (hours or days)
- 1.23 Fuel Drying Time and
 Conditions prior to ignition: _____
- 1.24 Limitations on Pile Size, Pile Number, and/or Acreage Limitations to Minimize Smoke (complete as appropriate): _____

It is the responsibility of the applicant to ensure that conditions of the SMP are met on the day of the burn. The applicant will obtain authorization to burn from the Air District contact listed below

Agenda Item No. 5 - Attachment 3

¹ If your burn is less than 1 acre with less than one ton particulate matter emissions, and your burn will not impact any smoke sensitive areas, you may complete only this page. Attach appropriate SMP sections for all other burns.

no more than 24 hours prior to ignition.2

1.26 Air District: Great Basin Unified APCD	1.28 Contact:
1.27 Address: 157 Short Street	1.29 24-hour Telephone: (760) 872-8211
Bishop, California 93514	1.30 Fax: (760) 872-6109
	1.31 Email: greatbasin@qnet.com

The applicant will report public smoke complaints to the Air District per the procedures described in the General Information section of this SMP on page 1.

Check as Applicable:

- ☐ **This burn could have an impact on smoke sensitive areas – I have filled out and attached all of Section A.**
- ☐ **This burn could have an impact on smoke sensitive areas and Air District policies require that information on meteorological conditions for ignition and contingency planning be provided – I have filled out and attached line items B.1 and B.2 of Section B.**
- ☐ **This burn is greater than 100 acres (or is estimated to produce greater than 10 tons of particulate matter) – I have filled out and attached all of Section B.**

Preparer's Statement: To the best of my knowledge the information submitted in this application is complete and accurate.

SMP Preparation Date: _____

Preparer's Name (print): _____

Title: _____

Preparer's Phone: (_____) _____ - _____

Preparer's Signature: _____ Date: _____

Name of Authorized Representative in Control of the Property,
if applicable (print): _____

Applicant or Authorized
Representative Signature: _____ Date: _____

SECTION A: AS REQUIRED BY TITLE 17 AND AIR DISTRICT POLICIES, THIS SECTION APPLIES TO ALL BURNS WITH THE POTENTIAL TO IMPACT SMOKE SENSITIVE AREAS (SSAs) *

A.1. Describe locations of SSAs and distances from burn site (miles) – (Also the attached Map#_____ shows SSAs)

A.2 The attached map# _____ provides smoke travel projections for:
_____ Day _____ Night _____ Topographical considerations.

A.3 Has prescribed burning historically occurred in this area? _____ Yes _____ No
_____ Don't Know

A.4 If yes, were there impacts to smoke sensitive areas? _____ Yes _____ No
_____ Don't Know

A.5 If yes, please describe impacts:

A.6 For burns that will occur past daylight hours and/or for more than one day, please provide Air District contact information and a description of contact procedures that will be used to affirm that the burn project remains within the conditions specified in this SMP, and/or whether contingency actions are necessary. The applicant will follow any instructions by the Air District to communicate directly with ARB when necessary. Air District contact (or designee) _____

A.7a Telephone: (_____) _____ - _____

A.7b 24-hour Pager (_____) _____ - _____

A.7c Fax: (_____) _____ - _____

A.7d E-mail: _____

A.8 The applicant will use the frequency and method of contact described below:

The applicant will monitor the burn project for meteorological conditions and smoke behavior before, during, and after the burn using the following techniques and timing:

A.9 Weather Observation (Wind Direction, Wind Speed, and Temperature):

<u>Method</u>	<u>Details</u>
_____ Belt Weather Kit	Location _____ Beginning _____ Interval _____ Ending _____
_____ RAWS	Location _____ Beginning _____ Interval _____ Ending _____
_____ Aircraft	Location _____ Beginning _____ Interval _____ Ending _____
_____ Other	Location _____ Beginning _____ Interval _____ Ending _____
_____ Additional Requirements:	_____
_____	_____
_____	_____

A.9 Smoke Behavior Observations:

<u>Method</u>	<u>Details</u>
_____ Visual	Location _____ Beginning _____ Interval _____ Ending _____
_____ Test Fire	Location _____ Beginning _____ Interval _____ Ending _____
_____ Balloon	Location _____ Beginning _____ Interval _____ Ending _____
_____ Aircraft	Location _____ Beginning _____ Interval _____ Ending _____
_____ PM Monitoring Inst	Location _____ Beginning _____ Interval _____ Ending _____
_____ Additional Requirements:	_____
_____	_____
_____	_____

A.11a The applicant shall begin public notification before the day of burning. The notification shall be on-going until the end of burning. Check which of the following procedures will be used to notify and educate the public about this burn project. _____Television _____Radio
_____Newspaper _____Posters/flyers _____Telephone calls _____Other (Explained in A.11b below)

A.11b The specifics of the notification procedure(s) checked above are as follows:

A.12 The applicant will place appropriate signage at or near burn sites to identify the burn project to the public as noted on the attached map#_____.

Adjacent Air Districts and neighboring state Air Districts which may potentially be impacted by smoke travel or which have previously been impacted by smoke from similar burn projects are listed below.

A.13 Air District Name: _____

A.14 Contact: _____

A.15 Address: _____

A.16 24-hour Telephone: _____

A.17 Fax: _____

A.18 Air District Name: _____

A.19 Contact: _____

A.20 Address: _____

A.21 24-hour Telephone: _____

A.22 Fax: _____.

23 Neighboring State Air District Name: _____

A.24 Contact: _____

A.25 Address: _____

A.26 24-hour _____

Telephone: _____

A.27 Fax: _____

* See General Information on page 1 for determining if your burn has the potential to impact a smoke sensitive area.

** Visual smoke observation refers to observations made through the eyes of designated individuals.

SECTION B: AS REQUIRED BY TITLE 17 AND AIR DISTRICT POLICIES, THIS SECTION APPLIES TO ALL BURN PROJECTS GREATER THAN 100 ACRES OR PRODUCING MORE THAN 10 TONS OF PARTICULATE MATTER

B.1. Meteorological Conditions for Ignition

Source of Meteorological Information: _____

Surface Wind Direction:

Ideal: _____ Acceptable Range: _____ (degrees)

Surface Wind Speed:

Ideal: _____ Maximum: _____ Minimum: _____ (mph)

Transport Wind Direction:

Ideal: _____ Acceptable Range: _____ (degrees)

Relative Humidity:

Ideal: _____ Maximum: _____ Minimum: _____ (%)

Target Mixing Height Parameters: _____

Acceptable Temperature Range: _____ (degrees)

Other Considerations to Assure Acceptable Smoke Dispersion:

- B.2a** Describe contingency actions/methods/procedures applicant will take in the event that serious smoke impacts begin to occur or meteorological conditions deviate from those specified in this SMP (for example: stop ignitions, initiate mop-up, conduct fire suppression – describe in detail):

- B.2b** Describe any applicable interior unit contingency cutoff lines (refer to map# ____ as appropriate):

B.3 An evaluation of alternatives to burning is described below:

_____ It is a part of the environmental documentation required for the burn project pursuant to the National Environmental Policy Act or the California Environmental Quality Act and is either attached to this SMP, is on file with the Air District, or is provided for as agreed to by the Air District. Document location:

_____ Neither a National Environmental Policy Act or the California Environmental Quality Act assessment of alternatives has been performed. Alternatives to reduce fuel load are described in section B.4 – B.9 below.

B.4 Alternatives Considered:

B.5 Alternatives Rejected and Reasons for Rejection:

B.6 Alternatives Used, and Tons of Vegetative Material Treated With Each Alternative:

B.7 Particulate Reduction for Each Alternative Used (tons):

B.8 Total Particulate Reductions from Alternatives Used:

B.9 If this project is greater than 250 acres or smoke impacts occur, the applicant will provide a completed Post Burn Evaluation Form (see page 11) to the Air District within 30 days of project completion.

B.10 For burns greater than 250 acres, Sections A.9 and A.10 describe the site monitoring requirements.

**Post-Burn Evaluation
For Burns Greater Than 250 Acres
or Burns For Which Complaints or Smoke Impacts Occurred***

Section A. General Information:

Date of Burn: _____ Burn Location: _____
Number of Acres Burned: _____ Estimated Actual PM Emissions: _____ (tons)
Burner Name: _____
Burner Address: _____
Burner Phone Number: _____
Burner Email: _____

1. Did the burn remain within the conditions specified in the Smoke Management Plan? _____
2. Were there any complaints or adverse smoke impacts? _____ If so, complete Section B below.
3. Lessons learned (Optional) (Provide attachment if desired):

Section B. For Burns That Had Smoke Impacts, Complete The Following:

1. Describe adverse smoke impacts below (add attachment if needed):

2. Were there any complaints from the public? _____ If so, how many and from whom:

3. What Air Districts were Notified (who, when, and at what phone number(s))?

4. Lessons learned (add attachment if needed):

5. Attach all smoke observation and weather data collected before, during, and after the burn. See collection methods checked in sections A.9 and A.10 of the burn plan for relevant data.

* As required by title 17 and air district policies.

Table 1 PM-10 EMISSIONS CALCULATIONS FOR PILES

1. Choose the pile size most representative of the piles on your burn site.
2. Multiply the number of piles in your project with the corresponding "Tons of PM10/Pile" value to get the total PM-10 tonnage.

PM10 EMISSIONS FOR SPECIFIED PILE SIZES		
PILE SIZE (in feet)	Pile Tonnage	TONS OF PM10/PILE
4' diameter x 3' height	0.056	0.0005
5' diameter x 4' height	0.12	0.001
6' diameter x 5' height	0.21	0.002
8' diameter x 6' height	0.45	0.004
10' diameter x 6' height	0.71	0.007
12' diameter x 8' height	1.3	0.01
15' diameter x 8' height	2.1	0.02
20' diameter x 10' height	4.7	0.04
25' diameter x 10' height	7.4	0.07
50' diameter x 10' height	29	0.3
Pile Tonnage calculated using paraboloid volume formula ^a multiplied by 30 lbs/cu.ft, multiplied by 0.2 packing ratio ^b		
U.S. Forest Service's Conformity Handbook, Table 6 -- PM10 Emissions Factor of 19.0 pounds/ton of fuel burned - average pile and burn slash		
Revised 2/13/2001		

- a. Formula used for Paraboloid Volume (cu.ft.) = $3.1416 \times [\text{height} \times (\text{diameter})^2] / 8$ (see Reference b. below).
b. USDA (2/1996). Forest Service General Technical Report. Report Number: PNW-GTR-364.

Table 2 PM 10 EMISSION CALCULATION FOR BURNING OF MULTIPLE FUEL TYPES^{1,2}

Section 80160 (b) of Subchapter 2 Smoke Management Guidelines for Agricultural and Prescribe Burning, Title 17, California Administrative Code states, "requires the submittal of smoke management plans for all burn projects greater than 10 acres in size or estimated to produce more than 1 ton of particulate matter". To determine what the particulate matter (PM 10) amount is of your burn project please use the equation below and review the following examples.

Information needed for PM 10 Calculations:

- a. VT = Vegetation type
b. ACRES VT = Estimated number of acres for VT
c. FL est. = Estimated fuel loading in VT TONS per ACRE
d. EV = PM10 emission/ton of fuel

Calculating PM10 Emissions from Prescribed Burning of multiple vegetation types:

$$\begin{aligned} \text{PM10 ton(s) emissions per VT} &= (\text{number of acres VT}) (\text{FL tons per acre}) (\text{Emission Value (EV)}) = \text{_____ ton(s)/VT} \\ \text{PM10 ton(s) emissions per VT} &= (\text{number of acres VT}) (\text{FL tons per acre}) (\text{Emission Value (EV)}) = \text{_____ ton(s)/VT} \\ \text{Sum Total is the Estimated PM 10 for the project} &= \text{_____ ton(s)/project} \end{aligned}$$

VEGETATION TYPE(S)	ACRES (VT) x	FL est. x	EV ¹	PM10 EMISSIONS (ton(s))
Basing Sage/Low Sage	(_____) x	(_____) x	(0.010) =	_____
Ceanothus	(_____) x	(_____) x	(0.010) =	_____
Chamise	(_____) x	(_____) x	(0.009) =	_____
Giant Sequoia	(_____) x	(_____) x	(0.007) =	_____
Grass/Forb	(_____) x	(_____) x	(0.007) =	_____
Hackberry Oak	(_____) x	(_____) x	(0.005) =	_____
Hardwood (Stocked)	(_____) x	(_____) x	(0.003) =	_____
Hardwood (Non-stocked)	(_____) x	(_____) x	(0.003) =	_____
Jeffrey Pine/Knobcone	(_____) x	(_____) x	(0.007) =	_____
Live Oak (Canyon)	(_____) x	(_____) x	(0.007) =	_____
Live Oak (Interior)	(_____) x	(_____) x	(0.007) =	_____
Lodgepole Pine	(_____) x	(_____) x	(0.007) =	_____
Manzanita (Productive Brush)	(_____) x	(_____) x	(0.009) =	_____
Mixed Chaparral/Montane	(_____) x	(_____) x	(0.008) =	_____
Mixed Conifer	(_____) x	(_____) x	(0.006) =	_____
Oak (Black)	(_____) x	(_____) x	(0.005) =	_____
Oak (Blue)	(_____) x	(_____) x	(0.003) =	_____
Oak (White)	(_____) x	(_____) x	(0.003) =	_____
Pinyon Pine	(_____) x	(_____) x	(0.007) =	_____
Ponderosa Pine, Gray Pine	(_____) x	(_____) x	(0.007) =	_____
Red Fir	(_____) x	(_____) x	(0.007) =	_____
Wet Meadow	(_____) x	(_____) x	(0.004) =	_____
Willow	(_____) x	(_____) x	(0.007) =	_____
Sum Total of the Estimated PM10 for the project in <u>tons/project</u>				= _____

1. See Table 3 on next page for values used to calculate EVs.
2. For vegetation types not listed, contact Air District for assistance with determining appropriate emission factors.

EMISSION VALUES (EVs) FOR BURNING OF MULTIPLE VEGETATION TYPES*

Calculation of PM10 emission values = (% combustion) x (PM10 emission lbs/ton) x (1 ton/2000 lbs)*

VEGETATION	%Combustion	PM Emissions (lbs/ton fuel)	Conversion Factor	PM EMISSION VALUE (PM10 tons emissions/ton fuel)
Basing Sage/Low Sage	= (1.0) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.010
Ceanothus	= (1.0) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.010
Chamise	= (0.9) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.009
Giant Sequoia	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Grass/Forb	= (1.0) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Hackberry Oak	= (0.4) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.005
Hardwood (Stocked)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Hardwood (Non-stocked)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Jeffrey Pine/Knobcone	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Live Oak (Canyon)	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Live Oak (Interior)	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Lodgepole Pine	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Manzanita (Productive Brush)	= (0.9) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.009
Mixed Chaparral/Montane	= (0.8) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.008
Mixed Conifer	= (0.6) x	(20.5 lbs/ton)	x (1 ton/2000 lbs)	= 0.006
Oak (Black)	= (0.4) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.005
Oak (Blue)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Oak (White)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Pinyon Pine	= (0.6) x	(22 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Ponderosa Pine, Gray Pine	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Red Fir	= (0.6) x	(23.1 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Wet Meadow	= (0.6) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.004
Willow	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007

* Percent combustion and PM10 emission factors for various fuel types derived from Table 8, Section 6, "Air Quality Conformity Handbook" from the USDA-Forest Service Air Resources / Fire Management Pacific Southwest Region dated November 1995.

** These are the vegetation's estimated emissions values(EV) from the vegetation type as determined above to be use when the burn operator provides the vegetation's fuel loading estimate per acre.

*** For additional information on emissions factors, see EPA document AP-42: "Compilation of Air Pollutant Emission Factors. Volume 1: Stationary Point and Area Sources," Fifth Edition, AP-42, January 1995, U.S. EPA. Table 2.5-5.

Attachment C

Example Special Permit Form to Burn on a No-Burn Day

No-Burn Day

Burn Permit Application

Permit # _____

Day of Burn _____

Owner/Operator _____ Date Requested _____

Address _____ Zip _____ Phone _____

Location of Burn _____ Amount in Acres/Tons _____

Material to be Burned _____ Drying Time _____ Days

Ag Burn Permit No. _____ Fire District _____

Ambient AQ standard exceedance forecast for today? _____ Downwind Impact? _____

How many no-burn days occurred in the 7 days prior to today? _____

State below the reasons why denying you a permit to burn TODAY - on a No-Burn Day - "would threaten imminent and substantial economic loss" pursuant to Section 41862 of the California Health & Safety Code.

(Continue on reverse if necessary)

Estimate dollar value of economic loss you will incur if burning is not completed TODAY.

Did you attempt to burn this material before today? _____ If not, why not? _____

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT pursuant to Section 118 of the California Penal Code:

Executed on (date) _____ at _____, California

Signature _____

**PERMIT VALID
ONE DAY ONLY**

Mail Copy to: Compliance Division
Air Resources Board
PO Box 2815

Sacramento, CA 95812
Agenda Item No. 5 - Attachment 3

200305

AQ Exceedance _____

Permit Denied _____

Permit Approved _____

Signed _____

APCD

Smoke Management Program

Page 51

**Smoke Management Program
for the Great Basin Unified Air
Pollution Control District**

Smoke Management Program for the Great Basin Unified Air Pollution Control District

Table of Contents

	<u>Page</u>
1.0 Purpose of the Smoke Management Program	2
2.0 Requirements for Prescribed and Agricultural Burning Operations	2
3.0 Smoke Management Plans	3
• For Burn Projects Greater than 1 acre or 1 ton of PM	3
• For Burn Projects Greater than 100 acres or 10 tons of PM	4
• If Smoke May Impact Sensitive Areas	4
• For Multi-Day Burns	4
• For Unplanned or Natural Ignition Fires	5
4.0 Burn Day Determination	5
5.0 Daily Burn Authorization	7
6.0 District Smoke Management Program Tracking and Enforcement	7
7.0 Cross-Jurisdictional Smoke Impacts	7
 Table 1. Limiting Mean 500-Millibar Heights by Month	 6
Figure 1. Map of Great Basin Unified Air Pollution Control District	8
 Attachment A – District Regulations for Open Outdoor Burning	 9
Attachment B – Example Form for Smoke Management Plan	32
Attachment C – Permit Form to Burn on a No-Burn Day	46

1.0 Purpose of the Smoke Management Program

The Smoke Management Program for the Great Basin Unified Air Pollution Control District (District) was developed in cooperation with the California Air Resources Board, public and private land managers, and fire protection authorities to minimize adverse air quality impacts related to smoke from prescribed burning; to protect public health; and to meet the requirements of the California Code of Regulations, Title 17, Smoke Management Guidelines for Agricultural and Prescribed Burning within the District's jurisdiction of Inyo, Mono, and Alpine counties (See Figure 1). This smoke management program was adopted by the District Governing Board on November 7, 2001 and was revised on March 5, 2020.

2.0 Requirements for Prescribed and Agricultural Burning Operations

Applicable Open Burning Activities

The District's Smoke Management Program and corresponding regulations for prescribed burning apply to all open outdoor fires used in agricultural and prescribed burning operations for:

- The growing of crops or raising of fowl or animals,
- Forest management and/or range improvement,
- Improvement of land for wildlife and game habitat,
- Disease or pest prevention,
- Maintenance of water delivery systems,
- Wildland vegetation management, and
- Unplanned or naturally ignited wildland fire managed for resource benefits.

Detailed definitions for agricultural burning and prescribed burning activities are included in Rule 101 Definitions, see Attachment A. Most of the requirements discussed in this program document do not apply to non-prescribed burning or non-agricultural burning operations. Requirements pertaining to open outdoor fires for non-prescribed burning and non-agricultural burning operations can be found in the District open outdoor burning regulations in Attachment A.

General Requirements for Prescribed and Agricultural Burning

The following is a summary of the District's prescribed and agricultural burning regulations to provide an overview of the requirements of the District's open outdoor burning regulations (Attachment A):

- a. Prescribed burning is to be conducted on permissive burn days, unless a special burn permit is obtained from the Air Pollution Control Officer (APCO).
- b. No person shall burn agricultural waste without a burn permit issued by the fire protection agency with jurisdiction for the location of the burn.
- c. Burning shall be managed to minimize smoke impacts to populated areas, to protect public health, and to prevent public nuisance.
- d. Vegetation to be burned shall be free of tires, rubbish, tar paper or construction debris, and reasonably free of dirt and soil.
- e. Material to be burned shall be arranged in a manner and condition to minimize smoke.

These additional requirements apply to prescribed and agricultural burning for range improvement, forest management, and wildland vegetation management. The land manager or their designee, shall:

- f. Submit an annual or seasonal list of proposed burn projects to the APCO, including areas considered for potential naturally-ignited wildland fires managed for resource benefits.
- g. Submit a smoke management plan to the APCO for review and approval for all burn projects over 1 acre or that have the potential to emit more than 1 ton of particulate matter emissions at least 30 days in advance of the proposed burn project. Smoke management plans for unplanned or naturally-ignited wildland fires managed for resource benefits that are expected to exceed 10 acres in size shall be submitted within 72 hours of the start of a fire.
- h. Notify the District at least 3 days before a planned burn to receive a burn day authorization before proceeding with the burn.
- i. Submit information as requested by the District summarizing prescribed burning activities conducted by the Fire Management Agency in the last calendar year. Reports should include the date, location, fuel type, fuel loading, and total acreage or tons of vegetation burned for each prescribed burn operation and wildfire. The annual reports will allow the District to track the total particulate matter emissions from prescribed burning operations and to determine general conformity with the air quality plans in federal PM-10 non-attainment areas.
- j. Ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and before ignition.

3.0 Smoke Management Plans

This section addresses the specific requirements for information that must be included in smoke management plans as required by District Rule 411.C. Smoke management plans should be submitted via a method approved by the District.

For Burn Projects Greater than 1 acre or 1 ton of PM:

For burn projects greater than 1 acre in size or estimated to produce more than 1 ton of particulate matter, the land manager, or their designee, shall submit a smoke management plan to the APCO for review and approval in advance of the proposed burn project, containing at a minimum the following information:

- a. Location, types, and amounts of material to be burned;
- b. Expected duration of the fire from ignition to extinction;
- c. Identification of responsible personnel, including contact information;
- d. Identification and location of all smoke sensitive areas; and
- e. Procedures for public notification and education, including messaging, appropriate signage at burn sites, and for reporting of public smoke complaints.

For Burn Projects Greater than 100 acres or 10 tons of PM:

For burn projects greater than 100 acres in size or estimated to produce more than 10 tons of particulate matter, the land manager, or their designee, shall submit a smoke management plan to the APCO for review and approval in advance of the proposed burn project, containing, at a minimum, all the information shown above for the less than 1 acre or 1 ton burns, and the following additional information:

- a. Identification of meteorological conditions necessary for burning. The plan should include projections of where the smoke from burns is expected to travel.
- b. The smoke management criteria the land manager or their designee will use for making burn ignition decisions.
- c. Discussion of the actions that will be taken to minimize smoke impacts.
- d. Specific mitigations and contingency actions (such as fire suppression or containment) that will be taken when identified thresholds or management action points occur or meteorological conditions deviate from those specified in the smoke management plan.
- e. An evaluation of considered alternatives to burning.
- f. Public notification procedures and methods.
- g. PM10 emissions from burn projects are limited to 42 tons within the Owens Valley non-attainment area (See Figure 1) in accordance with the State Implementation Plan (SIP) and to the General Conformity provisions of District Regulation XIII.

For burn projects greater than 250 acres and for any burn from which the APCO determines that there has been a significant smoke impact, the land manager or their designee shall also perform a post-burn smoke management evaluation.

If Smoke May Impact Sensitive Areas:

If smoke may impact smoke sensitive areas, the land manager, or their designee, shall include in the smoke management plan: public outreach and messaging, smoke forecasting, visual monitoring, ambient particulate matter monitoring or other monitoring or mitigation measures approved by the District, as required by the APCO for the following burn projects:

- a. Projects greater than 250 acres;
- b. Projects that will continue burning or producing smoke overnight;
- c. Projects conducted near smoke sensitive areas; or
- d. As otherwise required by the Air Pollution Control Officer.

For Multi-Day Burns:

For multi-day burns which may impact smoke sensitive areas, the land manager or their designee, shall coordinate with and provide notification to the District and California Air Resources Board (ARB) to affirm that the burn project remains within the conditions specified in the smoke management plan, or to determine whether contingency actions are necessary.

For Unplanned or Naturally-Ignited Fires:

For unplanned or naturally-ignited wildland fires managed for resource benefits that are expected to exceed 10 acres in size, the land manager or their designee, shall submit a smoke management plan to the District for review and approval within 72 hours of the start of a fire. In addition to the requirements for a planned ignition, smoke management plans for unplanned or naturally-ignited wildland fire managed for resource benefits shall include:

- Incorporation of air quality management considerations in fire management documents and decisions.
- Adaptive management based on forecasted and monitored smoke concentrations to match emissions to dispersion opportunities. The District may require limiting or postponing ignitions to avoid cumulative smoke impacts, prevent public nuisance, and prevent violations of the ambient air quality standards.
- Public notification and messaging methods.
- Additional forecasting, monitoring and mitigation measures as appropriate.

Per Title 17, for any unplanned or natural ignition that occurs on a no-burn day, the initial “go/no-go” decision to manage the fire for resource benefit will be a “no-go” unless:

- a. After consultation with the District, the District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
- b. For periods of less than 24 hours, a reasonable effort has been made to contact the District, or if the District is not available, ARB;
- c. After 24 hours, the District has been contacted, or if the District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit.
- d. A “no-go” decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

4.0 Burn Day Determination

“Permissive-burn days”, “marginal burn days” and “no-burn days” for open outdoor burning will be determined by ARB for the Great Basin Valleys Air Basin, which includes; Inyo, Mono and Alpine Counties. A permissive burn day will be declared when the following criteria are met:

- a. Near 4:00 a.m., the mean 500 mb height over the Great Basin Valleys Air Basin is less than the limiting mean height given in the Table 1.
- b. The expected 4:00 p.m. mean 500 mb height over the Great Basin Valleys Air Basin is less than the limiting mean height given in the Table 1.

Table 1. Limiting Mean 500-Millibar Heights by Month

Month	Mean 500-mb Height (meters)	Mean 500-mb Height (feet)
January	5750	18865
February	5740	18832
March	5740	18832
April	5760	18898
May	5800	19029
June	5850	19193
July	5880	19291
August	5880	19291
September	5870	19259
October	5850	19193
November	5810	19062
December	5780	18963

No-Burn Days for High Fire Hazard Conditions

Federal, State or local fire protection agencies in Inyo, Mono, or Alpine Counties may prohibit burning on days when weather and/or fuel moisture conditions create a potential wildfire risk. The ARB burn day determinations are not intended to permit open burning on days when such burning is prohibited by public fire protection agencies for purposes of fire control or prevention. In this case, no-burn day determinations declared by fire protection agencies over-ride permissive burn day determinations made by the ARB.

Permissive Burn Day Forecasts

The ARB shall specify each day of the year as a permissive burn day or a no-burn day for each air basin. Burn day decisions will be provided by ARB for the following day by 3:00 p.m. every day.

Forty-eight (48), 72 and 96-hour burn day forecasts can be obtained on request from the ARB Meteorology Section. An advance forecast should be obtained from ARB for any prescribed burn that will involve significant resources and would cause a hardship if the burn were cancelled due to the no-burn day status. Although the Air Pollution Control Officer may issue a special permit to conduct a prescribed burn on a no-burn day as declared by the ARB, the permittee will be required to show good cause for granting the special permit, and the amount of material allowed to be burned may be limited by the APCO (see Attachment A).

5.0 Daily Burn Authorization

Daily burn authorization from the District is required for all burn projects requiring a Smoke Management Plan to minimize smoke impacts to smoke sensitive areas and avoid cumulative smoke impacts. The land manager shall request burn authorization via a method approved by the District at least 3 days in advance of the planned burn and shall specify the amount of material, timing and location of the burning to be completed. The District will issue daily burn authorizations at least 24-hours before the burn. The District's burn authorization may be contingent upon, or subject to change, based on ARB burn day determinations, air quality conditions, meteorological conditions, or other conditions affecting smoke dispersion. The District may limit the amount or acreage of material to be burned, or require postponement of a burn. The District shall consider the following factors when reviewing a daily burn request:

- a. ARB burn day determination or forecast
- b. Current and forecasted air quality conditions;
- c. Forecasted meteorological conditions, including wind speeds and directions at the surface and aloft, and atmospheric stability;
- d. Types and amounts of materials to be burned;
- e. Location and timing of materials to be burned;
- f. Locations of smoke sensitive areas; and
- g. Smoke from all burning activities, including other burns with the District or burning in neighboring air districts or regions which may affect the District or region.

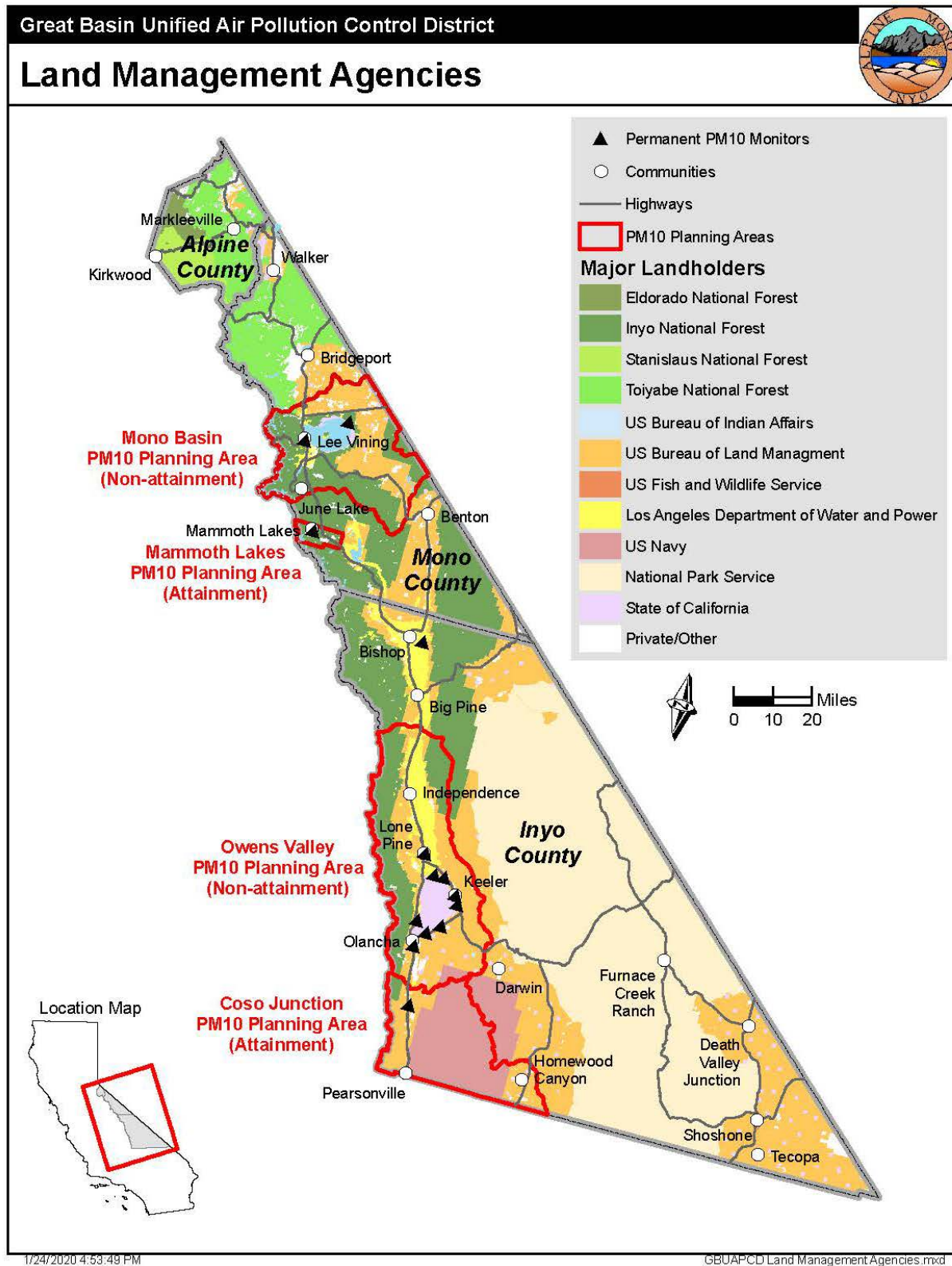
6.0 District Smoke Management Program Tracking and Enforcement

For all prescribed and agricultural burns requiring a smoke management plan, the District will maintain records including the location, type of burn and estimated tonnage and/or acreage burned. The District may request information from the land managers for additional information. An annual prescribed burning report summarizing the burn activities and the amount of material treated will be submitted to ARB within 45 days of the end of each calendar year as required by Title 17. Land managers, fire protection personnel or the public may contact the APCO, Deputy APCO or the smoke management program coordinator at the District office (760) 872- 8211 if there are any questions regarding the smoke management program or burn day authorizations. The APCO, DAPCO, and two Air Quality Specialists will be responsible for enforcement of all District regulations related to open outdoor fires and prescribed burning. Notices of violation issued for open outdoor fires or prescribed burning will be treated and settled in the same manner as all other District regulations.

7.0 Cross-Jurisdictional Smoke Impacts

The District will communicate and coordinate with surrounding air districts and jurisdictions regarding cross-jurisdictional smoke impacts. For burns occurring outside the District's jurisdiction, District staff will maintain regular communication with surrounding air districts and jurisdictions to ensure the District and public are notified of burns that may impact the district and to ensure the potential impacts to the District are considered in decision making. Additionally, if smoke from a project with District boundaries may impact other jurisdictions, District staff shall notify the appropriate air quality agency as soon as practical and before ignition.

Figure 1. Map of Great Basin Unified Air Pollution Control District



Attachment A

District Regulations

for Open Outdoor Burning

RULE 101. DEFINITIONS

Adopted: 09/05/74 Revised: 03/10/76, 10/01/76, 06/25/79, 02/09/81, 11/04/92, 05/08/96, 11/07/01, 09/24/03

Except as otherwise specifically provided in these rules and except where the content otherwise indicates, words used in these rules are used in exactly the same sense as the same words are used in Part 1 of Division 26 of the Health and Safety Code.

A. AGRICULTURAL BURNING

1. "Agricultural burning" means open outdoor fires used in 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.
2. "Agricultural burning" also means open outdoor fires used in the operation or maintenance of a system for the delivery of water for the purposes specified in Subsection 1.
3. "Agricultural burning" also means open outdoor fires used in wildland vegetation management burning. 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, tule, or standing brush. Prescribed burning is the planned application of fire to vegetation to achieve any specific objective on lands selected in advance of that application. The planned application of fire may also include natural or accidental ignition.

B. AGRICULTURAL OPERATION

"Agricultural operation" means the growing of crops, the raising of fowl, animals or bees, as a gainful occupation.

C. AGRICULTURAL WASTES

"Agricultural wastes" are defined as unwanted or unsalvageable material produced wholly from agricultural operations directly related to the growing of crops or the raising of animals for the primary purpose of making a profit or for a livelihood. This also includes, for the purpose of cultural practice burns, the burning of fence rows and ditch banks for weed control and weed maintenance and burning in nontillage orchards operations and of paper raisin trays, but does not include such items as shop wastes, demolition materials, garbage, oil filters, tires, pesticide containers (except paper pesticide containers), broken boxes, pallets, and other similar material, or orchard or vineyard wastes removed for land use conversion to non-agricultural purposes.

D. AIR CONTAMINANTS

"Air Contaminant" includes smoke, charred paper, dust colloids, soot, grime, carbon, noxious acid, noxious fumes, noxious gases, odors, or particulate matter, or any combination thereof.

E. ATMOSPHERE

"Atmosphere" means the air that envelopes or surrounds the earth. Where air contaminants are emitted into a building or structure not designed specifically as a piece of air pollution control equipment such emission into the building or structure shall be considered an emission into the atmosphere.

F. BOARD

"Board" means the Air Pollution Control Board of the Great Basin Unified Air Pollution Control District.

G. BRUSH TREATED

"Brush treated" means that the material to be burned has been felled, crushed or uprooted with mechanical equipment, has been desiccated with herbicides, or is dead.

H. BURN DAY

"Burn day," or "permissive-burn day" means any day on which agricultural burning, including prescribed burning, is not prohibited by the state board within the Great Basin Unified Air Pollution Control District and is authorized by the Air Pollution Control Officer consistent with District regulations related to open outdoor fires.

I. COMBUSTIBLE REFUSE

"Combustible Refuse" is any solid or liquid combustible waste material containing carbon in a free or combined state.

J. COMBUSTION CONTAMINANTS

"Combustion Contaminants" are solid or liquid particles discharged into the atmosphere from the burning of any kind of material containing carbon in a free or combined state.

K. DUSTS

"Dusts" are minute solid particles released into the air by natural forces or by mechanical processes such as crushing, grinding, milling, drilling, demolishing, blasting, shoveling, conveying, covering, bagging and sweeping or any combination thereof.

L. FLUE

"Flue" means any duct or passage for air, gases, or the like, such as a stack or chimney.

M. FOREST MANAGEMENT BURNING

"Forest Management Burning" means the use of open fires, as a part of a forest practice, to remove forest debris. Forest management practices include timber operations, silvicultural practices or forest protection practices.

1. "Timber Operations" means cutting or removal of timber or other forest vegetation.
2. "Silvicultural" means the establishment, development, care and reproduction of stands of timber.

N. FUMES

"Fumes" are minute solid particles generated by the condensation of vapors from solid matter after volatilization from the molten state, or generated by sublimation, distillation, calcination or chemical reaction, when these processes create air-borne particles.

O. HOUSEHOLD RUBBISH

"Household Rubbish" means combustible waste material and trash, including garden trash and prunings, normally accumulated by a family in a residence in the course of ordinary day to day living. See also Rule 101 BB. Waste.

P. INCINERATOR

"Incinerator" means any furnace or other closed fire chamber used for the burning of combustible refuse from which the products of combustion are directed through a chimney or flue. "Incinerator" also means any device constructed of nonflammable materials, including containers commonly known as burn barrels, for the purpose of burning therein trash, debris, and other flammable materials for volume reduction or destruction.

Q. MULTIPLE-CHAMBER INCINERATOR

"Multiple-chamber incinerator" is any article, machine, equipment, contrivance, structure or part of a structure used to dispose of combustible refuse by burning, consisting of three or more refractory lined combustion furnaces in series, physically separated by refractory walls, interconnected by gas passage ports or ducts and employing adequate design parameters necessary for maximum combustion of the material to be burned.

R. OIL-EFFLUENT WATER SEPARATOR

"Oil-effluent Water Separator" is any tank, box, sump or other container in which any petroleum or product thereof, floating on or entrained or contained in water entering such tank, box, sump or other container is physically separated and removed from such water prior to outfall, drainage, or recovery of such water.

S. OPEN OUTDOOR FIRE

"Open Outdoor Fire" means the burning or smoldering of any combustible material of any type outdoors in the open air, either inside or outside a fireproof container, where the products of combustion are not directed through a chimney or flue.

T. PARTICULATE MATTER

"Particulate matter (PM)" means any airborne finely divided material, except uncombined water, which exists as a solid or liquid at standard conditions (e.g., dust, smoke, mist, fumes or smog). "PM2.5" means particles with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers. "PM10" means particles with an aerodynamic diameter less than or equal to a nominal 10 micrometers (including PM2.5).

U. PERSON

"Person" means any person, firm, association, organization, partnership, business trust, corporation, company contractor, supplier, installer, user, owner, or any Federal, State or local governmental agency or public district, or any officer, or employee thereof. "Person" also means the United States or its agencies, to the extent authorized by Federal Law.

V. PRESCRIBED BURNING

"Prescribed burning" means the planned application of fire to vegetation on lands selected in advance of such application, where any of the purposes of the burning are specified in the definition of agricultural burning as set forth in Health and Safety Code Section 39011.

W. PROCESS WEIGHT PER HOUR

"Process Weight" is the total weight of all materials introduced into any specific process which process may cause any discharge into the atmosphere. Solid fuels charged will be considered as part of the process weight, but liquid and gaseous fuels and combustion air will not. The "Process Weight per Hour" will be derived by dividing the total process weight by the number of hours in one cycle of operation from the beginning of any given process to the completion thereof, excluding any time during which the equipment is idle.

X. RANGE IMPROVEMENT BURNING

"Range Improvement Burning" means the use of open fires to remove vegetation for a wildlife, game or livestock habitat or for the initial establishment of an agricultural practice on previously uncultivated land.

Y. REGULATION

"Regulation" means one of the major subdivisions of the rules of the Great Basin Unified Air Pollution Control Districts.

Z. RULE

"Rule" means a rule of the Great Basin Unified Air Pollution Control District.

AA. SECTION

"Section" means the section of the Health and Safety Code of the State of California, as amended, effective January 1, 1976, unless some other statute is specifically mentioned.

AB. SOURCE OPERATION

"Source Operation" means the last operation preceding the emission of an air contaminant for which the operation both:

1. Results in the separation of the air contaminant from the process materials or in the conversion of the process materials into air contaminants, as in the case of combustion of fuel; and
2. Is not an air pollution abatement operation.

AC. WILDLAND VEGETATION MANAGEMENT BURNING

"Wildland vegetation management burning" means 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 (as defined in Title 14, California Code of Regulations, Section 1561.1), trees, grass, tule, or standing brush.

AD. NON-INDUSTRIAL WOOD WASTE

"Non-industrial wood waste" means wood waste from trees, vines and brush that is not produced as a result of an industrial process.

AE. OPEN BURN/OPEN DETONATION OPERATIONS (OB/OD)

"Open burn/open detonation operations" refers to the treatment of propellants, explosives, and pyrotechnics (PEP) at military bases. During "open burning," raw material mixes with air and burns at temperatures which can exceed 3500 degrees Kelvin and pressures greater than 1000 pounds per square inch absolute. The open burning process entails a rapid oxidation of some fuel with a heat release and formation of combustion products. The burning of waste munitions converts the solid materials to gaseous products and particulate matter. Open detonation produces temperatures and pressures that are considerably greater than open burning. Detonation is an explosion in which a chemical transformation passes through the material faster than the speed of sound.

AF. "Air quality" means the characteristics of the ambient air as indicated by state ambient air quality standards which have been adopted by the state board pursuant to section 39606 of the Health and Safety Code and by National Ambient Air Quality Standards which have been established pursuant to sections 108 and 109 of the federal Clean Air Act pertaining to criteria pollutants and section 169A of the federal Clean Air Act pertaining to visibility.

- AG. "Ambient air" means that portion of the atmosphere, external to buildings, to which the general public has access.
- AH. "CARB," "ARB" or "state board" means the California Air Resources Board.
- AI. "Burn plan" means an operational plan for managing a specific fire to achieve resource benefits and specific management objectives. The plan includes, at a minimum, the project objectives, contingency responses for when the fire is out of prescription with the smoke management plan, the fire prescription (including smoke management components), and a description of the personnel, organization, and equipment.
- AJ. "Burn project" means an active or planned prescribed burn or a naturally ignited wildland fire managed for resource benefits.
- AK. "Class I Area" means a mandatory visibility protection area designated pursuant to section 169A of the federal Clean Air Act.
- AL. "Fire protection agency" means any agency with the responsibility and authority to protect people, property, and the environment from fire, and having jurisdiction within a district or region.
- AM. "Land manager" means any federal, state, local, or private entity that administers, directs, oversees, or controls the use of public or private land, including the application of fire to the land.
- AN. "National Ambient Air Quality Standards (NAAQS)" mean standards promulgated by the United States Environmental Protection Agency that specify the maximum acceptable concentrations of pollutants in the ambient air to protect public health with an adequate margin of safety, and to protect public welfare from any known or anticipated adverse effects of such pollutants (e.g., visibility impairment, soiling, harm to wildlife or vegetation, materials damage, etc.) in the ambient air.
- AO. "No-burn day" means any day on which agricultural burning, including prescribed burning, is prohibited by the state board, or the Air Pollution Control Officer.
- AP. "Open burning in agricultural operations in the growing of crops or raising of fowl or animals" means:
1. The burning in the open of materials produced wholly from operations in the growing and harvesting of crops or raising of fowl or animals for the primary purpose of making a profit, of providing a livelihood, or of conducting agricultural research or instruction by an educational institution.
 2. In connection with operations qualifying under paragraph 1:
 - a. The burning of grass and weeds in or adjacent to fields in cultivation or being prepared for cultivation.

- b. The burning of materials not produced wholly from such operations, but which are intimately related to the growing or harvesting of crops and which are used in the field, except as prohibited by district regulations. Examples are trays for drying raisins, date palm protection paper, and fertilizer and pesticide sacks or containers, where the sacks or containers are emptied in the field.
- AQ. "Prescribed fire" means any fire ignited by management actions to meet specific objectives, and includes naturally-ignited wildland fires managed for resource benefits.
- AR. "Smoke Management Plan" means a document prepared for each prescribed fire by land managers or fire managers that provides the information and procedures required in Rule 411.
- AS. "Smoke sensitive areas" are populated areas and other areas where the Air Pollution Control Officer determines that smoke and air pollutants can adversely affect public health or welfare. Such areas can include, but are not limited to, towns and villages, campgrounds, trails, populated recreational areas, hospitals, nursing homes, schools, roads, airports, public events, shopping centers, and mandatory Class I areas.
- AT. "State ambient air quality standards" means specified concentrations and durations of air pollutants which reflect the relationship between the intensity and composition of air pollution to undesirable effects, as established by the state board pursuant to Health and Safety Code section 39606.
- AU. "Wildfire" means an unwanted wildland fire.
- AV. "Wildland" means an area where development is generally limited to roads, railroads, power lines, and widely scattered structures. Such land is not cultivated (i.e., the soil is disturbed less frequently than once in 10 years), is not fallow, and is not in the United States Department of Agriculture (USDA) Conservation Reserve Program. The land may be neglected altogether or managed for such purposes as wood or forage production, wildlife, recreation, wetlands, or protective plant cover. "Wildland" also means any lands that are contiguous to lands classified as a state responsibility area if wildland fuel accumulation is such that a wildland fire occurring on these lands would pose a threat to the adjacent state responsibility area. For California Department of Forestry (CDF) only, "Wildland" as specified in California Public Resources Code (PRC) section 4464(a) means any land that is classified as a state responsibility area pursuant to article 3 (commencing with section 4125) of chapter 1, part 2 of division 4 and includes any such land having a plant cover consisting principally of grasses, forbs, or shrubs that are valuable for forage.
- AW. "Wildland fire" means any non-structural fire, other than prescribed fire, that occurs in the wildland. For CDF only, "wildland fire" as specified in PRC section 4464(c) means any uncontrolled fire burning on wildland.
- AX. "Wildland/urban interface" means the line, area, or zone where structures and other human development meet or intermingle with the wildland.
- AY. "Approved ignition device" means an instrument or material that will ignite open fires without the production of black smoke by the ignition device, as approved by the APCO.

- AZ. "Burn Barrel" means a metal container used to hold combustible or flammable waste materials so that they can be ignited outdoors for the purpose of disposal.
- BA. "Natural vegetation" means all plants, including but not limited to grasses, forbs, trees, shrubs, flowers, or vines that grow in the wild or under cultivation. Natural vegetation excludes vegetative materials that have been processed, treated or preserved with chemicals for subsequent human or animal use, including but not limited to chemically-treated lumber, wood products or paper products.
- BB. "Waste" for the purpose of District Rules 406 and 407, means all discarded putrescible and non-putrescible solid, semisolid, and liquid materials, including but not limited to petroleum products and petroleum wastes; construction and demolition debris; coated wire; tires; tar; tarpaper; wood waste; processed or treated wood and wood products; metals; motor vehicle bodies and parts; rubber; synthetics; plastics, including plastic film, twine and pipe; fiberglass; styrofoam; garbage; trash; refuse; rubbish; disposable diapers; ashes; glass; industrial wastes; manufactured products; equipment; instruments; utensils; appliances; furniture; cloth; rags; paper or paper products; cardboard; boxes; crates; excelsior; offal; swill; carcass of a dead animal; manure; human or animal parts or wastes, including blood; fecal- and food-contaminated material. For the purpose of District Rule 406, dry, natural vegetation waste from yard maintenance is excluded from the meaning of "waste," if the material is reasonably free of dirt, soil and surface moisture.

[Intentionally left blank.]

RULE 405. EXCEPTIONS

Adopted: 09/05/74 Revised: 03/10/76, 05/08/96, 11/07/01, 07/7/05

Rules 400, 404-A and 404-B do not apply to:

- A. Fire set by or permitted by a public officer if such fire is set or permission given in the performance of an official duty of such officer, and such fire, in the opinion of such officer, is necessary:
 - 1. For the purpose of the prevention of a fire hazard which cannot be abated by other means, or
 - 2. The instruction of public employees in the methods of fighting fire.
- B. Fires set pursuant to a permit on property used for industrial purposes for the purpose of instruction of employees in methods of fighting fire.
- C. [Deleted: 07/07/05]
- D. The use of an orchard, field crop, or citrus grove heater which does not produce unconsumed, solid carbonaceous matter at a rate in excess of that allowed by State law.
- E. [Deleted: 07/07/05]
- F. The treatment of waste propellants, explosives and pyrotechnics (PEP) in open burn/open detonation operations on military bases for operations approved in accordance with a burn plan as required in Rule 432.
- G. Burning of materials for the purpose of creating special effects during production of commercial or educational films, videos or photographs.
- H. Disposal of contraband (confiscated controlled substances) by burning.
- I. Recreational or ceremonial fires contained in a fireplace, barbeque, or fire pit.
- J. A fire set for the purpose of eliminating a public health hazard that cannot be abated by any other practical means.

[Intentionally left blank.]

RULE 406. OPEN OUTDOOR FIRES

Adopted: 01/21/76 Revised: 10/01/76, 11/04/92, 11/07/01, 09/24/03

A person shall not burn any combustible refuse or waste in any open outdoor fire within the boundaries of the Great Basin Unified Air Pollution Control District, except:

- A. When such fire is set or permission for such fire is given in the performance of the official duty of any public officer, and such fire in the opinion of such officer is necessary:
 - 1. For the purpose of the prevention of a fire hazard which cannot be abated by other means, or
 - 2. The instruction of public employees, or public volunteers under the supervision of a public officer, in the methods of fighting fire.
- B. When such fire is set pursuant to permit on property used for industrial purposes for the purpose of instruction of employees in methods of fighting fires.
- C. Agricultural fires necessary to maintain and continue an agricultural operation set or permitted by a fire official having jurisdiction in the performance of official duty for the purposes of:
 - 1. Control and disposal of agricultural wastes.
 - 2. Range improvement burning.
 - 3. Forest management burning.
 - 4. Fires set in the course of any agricultural operation in the growing of crops, or raising of fowls or animals.
 - 5. Abatement of an immediate health hazard.
 - 6. Wildland vegetation management burning.
- D. On burn days as declared by the State Air Resources Board and pursuant to a valid burn permit as authorized by the Great Basin Unified Air Pollution Control District, fires for the disposal of the following material in the described manner originating from a single or two family dwelling on its premises:
 - 1. Dry non-glossy paper and cardboard, ignited using an approved ignition device, in geographic areas granted a temporary exemption pursuant to Title 17, § 93113(e) of the California Code of Regulations.
 - 2. Dry natural vegetation waste reasonably free of dirt, soil and visible surface moisture by ignition using an approved ignition device.
- E. Fires used only for the cooking of food for human beings or for recreational purposes.

- F. Fires, on burn days as declared by the State Air Resources Board and pursuant to a valid burn permit as authorized by the Great Basin Unified Air Pollution Control District, for the clearing of rights-of-way by a public entity or public utility where access by chipping equipment is not available by existing means or for reservoir maintenance.
- G. Except in case of emergency, permits for the setting of a fire or fires permitted by this rule shall be granted by the Air Pollution Control Officer, or by the public fire official having jurisdiction over the proposed burn location.
- H. When such fire is set for the purpose of burning non-industrial wood waste pursuant to a valid permit as authorized by the Great Basin Unified Air Pollution Control District under District Rule 412.
- I. Burning of materials for the purpose of creating special effects during production of commercial or educational films, videos or photographs. Such burn events cannot pose a public nuisance or health threat, or cause an exceedance of National or State ambient air quality standards.
 - 1. Any person seeking to set fires under this provision shall obtain a valid burn permit from the local fire protection agency.
 - 2. To gain an exemption, the following information shall be submitted to the District in writing at least 10 days in advance of the burn:
 - a. Location of proposed burn,
 - b. Date and approximate time of proposed burn,
 - c. Type and volume of material to be burned, and
 - d. Expected duration of proposed burn.
 - 3. The burner shall notify the APCO the day before each burn.
 - 4. Permission to burn on other than a permissive burn day shall be subject to written approval by the APCO. If the APCO grants written approval, such approval shall be available at the burn location for inspection by District personnel.
- J. Disposal of contraband (confiscated controlled substances) by burning. Such fire must be set and tended by official law enforcement personnel and must have been deemed not disposable by any other means by such officials. Prior to such burns, the District shall be informed of the place, date and time of the burn, and type and quantity of contraband to be disposed.
 - 1. Any person seeking to set fires under this provision shall obtain a valid burn permit from the local fire protection agency.
 - 2. The burner shall notify the APCO the day before each burn.
 - 3. Permission to burn on other than a permissive burn day shall be subject to written approval by the APCO. If the APCO grants written approval, such

approval shall be available at the burn location for inspection by District personnel.

- K. Recreational or ceremonial fires contained in a fireplace, barbeque, or fire pit, provided material burned is free of household, municipal, and industrial waste, such as: tires, tar, plastics and wet wood.
- L. A fire set for the purpose of eliminating a public health hazard that cannot be abated by any other practical means.
 - 1. Any person seeking to set fires under this provision shall obtain a valid burn permit from the local fire protection agency.
 - 2. To gain an exemption, the following information shall be submitted to the District in writing at least 10 days in advance of the burn:
 - a. Written recommendation for such fire by a public health officer,
 - b. Location of proposed burn,
 - c. Date and approximate time of proposed burn,
 - d. Type and volume of material to be burned, and
 - e. Expected duration of proposed burn.
 - 3. The burner shall notify the APCO the day before each burn.
 - 4. Permission to burn on other than a permissive burn day shall be subject to written approval by the APCO. If the APCO grants written approval, such approval shall be available at the burn location for inspection by District personnel.

[Intentionally left blank.]

RULE 408. OPEN BURNING IN AGRICULTURAL OPERATIONS OR DISEASE OR PEST PREVENTION

Adopted: 09/05/74 Revised: 03/10/76, 06/25/79, 07/01/92, 11/04/92, 11/07/01

- A. No person shall burn agricultural wastes on "no burn" days as announced by the State Air Resources Board for the Counties of Inyo, Mono, and Alpine or when prohibited by the Air Pollution Control Officer.
- B. Such burning when authorized shall conform to the following criteria:
1. Material to be burned shall be as dry as feasible prior to burning, and shall be free from combustible impurities such as tires, tar paper, rubbish, plastics, demolition or construction debris, and shall be reasonably free of dirt, soil, and visible surface moisture.
 2. Trees and branches over two inches in diameter shall have been dried for at least 10 days prior to burning.
 3. Branches under two inches in diameter and prunings shall have been dried for at least 1 week prior to burning.
 4. Wastes from field crops that are cut in a green condition shall have been dried for at least 1 week prior to burning.
 5. Exceptions to the foregoing may be made by the fire authority which issues the permits to burn, after notification to the Air Pollution Control Officer, and if the material to be burned is diseased or insect infested and there would be irreparable damage if the foregoing standards were rigidly enforced.
 6. Material to be burned shall be so arranged as to burn with a minimum of smoke.
 7. All burning shall conform to the applicable jurisdictional fire code(s).
 8. Rice, barley, oat, and wheat straw shall be ignited only by stripfiring into the wind or by backfiring, except under a special permit of the district issued when and where extreme fire hazards are declared by a public fire protection agency to exist, or where crops are determined by the district not to lend themselves to these techniques.
- C. The use of oil or tires in connection with the ignition or burning of agricultural wastes, roadsides, ditch banks, or patches of vegetation is prohibited.
- D. No agricultural wastes shall be burned without a permit issued by a fire protection authority having jurisdiction over the proposed burn location. As a condition to the issuance of a permit, each applicant shall provide the information required by the issuing agency on forms prepared jointly by said agency and the District. The permit may place a limit upon the amount of materials to be burned in any one day and the hours of the day during which time the material may be burned. Further, the form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board

or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'

- E. Burning shall be curtailed when smoke is drifting into a populated area or creating a public nuisance.
- F. Burning hours shall be set so that no field crop burning shall commence before 10:00 a.m. or after 5:00 p.m. of any day, unless the Air Pollution Control Officer determines that local conditions indicate that other hours are appropriate.

[Intentionally left blank.]

RULE 409. RANGE IMPROVEMENT BURNING

Adopted: 03/10/76 Revised: 10/01/76, 07/01/92, 11/07/01

- A. No range improvement burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency having jurisdiction over the proposed burn location. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. Range improvement burning, when permitted, shall comply with all the provisions of this rule and all the provisions for wildland vegetation management burning in wildland and wildland/urban interface areas under District Rule 411.
- C. Range improvement burning when permitted shall conform to the following criteria:
 - 1. Where economically and technically feasible, brush shall be treated by chemical or mechanical means at least 6 months prior to a proposed burn, to kill or uproot the brush in order to insure rapid combustion.
 - 2. Unwanted trees over 6" in diameter in the burn area or those not effectively treated at the time of the brush treatment shall be felled at least 3 months prior to the burn, but a longer time may be required where conditions warrant.

[Intentionally left blank.]

RULE 410. FOREST MANAGEMENT BURNING

Adopted: 09/05/74 Revised: 03/10/76, 07/01/92, 11/07/01

- A. No forest management burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency having jurisdiction over the proposed burn locations. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. Forest management burning, when permitted, shall comply with all the provisions of this rule and all the provisions for wildland vegetation management burning in wildland and wildland/urban interface areas under District Rule 411.
- C. Forest management burning, when permitted, shall conform to the following criteria:
 - 1. Waste shall be dried sufficiently to insure rapid combustion.
 - 2. Where possible, unless good management dictates otherwise, waste to be burned shall be windrowed or piled so as to burn with a minimum of smoke.

[Intentionally left blank.]

RULE 411. WILDLAND VEGETATION MANAGEMENT BURNING

Adopted: 09/05/74 Revised: 03/10/76, 07/01/92, 11/07/01, 03/05/20

- A. No wildland vegetation management burning may be done without first having obtained a permit from the California Department of Forestry and Fire Protection or other designated agency having jurisdiction over the proposed burn locations. The form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural or prescribed burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- B. No person shall conduct wildland vegetation management burning on "no-burn" days as announced by the California Air Resources Board (ARB) for the Inyo, Mono and Alpine Counties or when such burning is prohibited by the Air Pollution Control Officer except when the Air Pollution Control Officer has authorized by special permit pursuant to Section 80120 of Title 17 of the California Code of Regulations agricultural or prescribed burning on days designated by the State Air Resources Board as no-burn days because the denial of such permit would threaten imminent and substantial economic loss. In authorizing such burning the Air Pollution Control Officer may limit the amount of acreage which can be burned in any one day and only authorize burning that is not forecasted to cause or significantly contribute to exceedances of the ambient air quality standards. Every applicant for a permit to burn on a no-burn day pursuant to this section shall provide information in writing to the Air Pollution Control Officer for evaluation, stating why the denial of such a permit would threaten imminent and substantial economic loss.
- C. Wildland vegetation management burning, when permitted, shall conform to the following criteria:
1. The land manager, or their designee, shall annually or seasonally submit a potential list of burn projects to the Air Pollution Control Officer, including areas considered for potential naturally-ignited wildland fires managed for resource benefits, with updates as they occur.
 2. A Smoke Management Plan shall be submitted for all burn projects greater than 1 acre in size or estimated to produce more than 1 ton of particulate matter. The land manager, or their designee, shall submit the smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing at a minimum, the following information:
 - a. Location, types, and amounts of material to be burned;
 - b. Expected duration of the fire from ignition to extinction;
 - c. Identification of responsible personnel, including contact information;
 - d. Identification and location of all smoke sensitive areas; and
 - e. Procedures for public notification and education, including public outreach, appropriate signage at burn sites, and for reporting of public smoke complaints.

3. For burn projects greater than 100 acres in size or estimated to produce more than 10 tons of particulate matter the land manager, or their designee, shall submit a smoke management plan to the Air Pollution Control Officer for review and approval at least 30 days in advance of the proposed burn project, containing all the information in subsection 2 and at a minimum the following additional information:
 - a. Identification of meteorological conditions necessary for burning. The plan should include projections of where the smoke from burns is expected to travel.
 - b. The smoke management criteria the land manager or their designee will use for making burn ignition decisions.
 - c. Discussion of the actions that will be taken to minimize smoke impacts.
 - d. Specific mitigations and contingency actions (such as fire suppression or containment) that will be taken when identified thresholds or management action points occur or meteorological conditions deviate from those specified in the smoke management plan.
 - e. An evaluation of considered alternatives to burning.
 - f. Public notification procedures and methods.
4. If smoke may impact smoke sensitive areas, the land manager, or their designee, shall include in the smoke management plan; public outreach and messaging, smoke forecasting, visual monitoring, ambient particulate matter monitoring or other monitoring or mitigation measures approved by the District, as required by the Air Pollution Control Officer for the following burn projects:
 - a. Projects greater than 250 acres;
 - b. Projects that will continue burning or producing smoke overnight;
 - c. Projects conducted near smoke sensitive areas; or
 - d. As otherwise required by the Air Pollution Control Officer.
5. Daily burn authorization from the District is required for all burn projects requiring a Smoke Management Plan to minimize smoke impacts to smoke sensitive areas and avoid cumulative smoke impacts. The land manager shall request burn authorization via a method approved by the District at least 3 days in advance of the planned burn and shall specify the amount, timing and location of the burning to be completed. The District will issue daily burn authorizations at least 24-hours prior to the burn. The District's burn authorization may be contingent upon, or subject to change based on ARB burn day determination, air quality conditions, meteorological conditions, or other conditions affecting smoke dispersion. The District shall consider the following factors in reviewing a daily burn request:
 - a. ARB burn day determination or forecast;
 - b. Current and forecasted ambient air quality conditions;

- c. Forecasted meteorological conditions, including wind speeds and directions at the surface and aloft, and atmospheric stability;
 - d. Types and amounts of materials to be burned;
 - e. Location and timing of materials to be burned;
 - f. Locations of smoke sensitive areas; and
 - g. Smoke from all burning activities, including burning in neighboring air districts or regions which may affect the District or region.
6. For any burns which may impact smoke sensitive areas, the land manager or their designee, shall coordinate with and provide notification to the District and the ARB to affirm that the burn project remains within the conditions specified in the smoke management plan, or to determine whether contingency actions are necessary.
7. For any natural ignition that occurs on a no-burn day, the initial “go/no-go” decision to manage the fire for resource benefit will be a “no-go” unless:
- a. After consultation with the District, the District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
 - b. For periods of less than 24 hours, a reasonable effort has been made to contact the District, or if the District is not available, the ARB;
 - c. After 24 hours, the District has been contacted, or if the District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit.

A “no-go” decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

8. For any unplanned or naturally-ignited wildland fire managed for resource benefits that are expected to exceed 10 acres in size, the land manager or their designee, shall submit a smoke management plan to the District for review and approval within 72 hours of the start of a fire. In addition to the requirements for a planned ignition, Smoke management plans for unplanned or naturally-ignited wildland fire managed for resource benefits shall include:
- a. Incorporation of air quality management considerations in fire management documents and decisions.
 - b. Adaptive management based on forecasted and monitored smoke concentrations to match emissions to dispersion opportunities. The District may require limiting or postponing ignitions to avoid cumulative smoke impacts, prevent public nuisance, and prevent violations of the ambient air quality standards.
 - c. Public notification and messaging methods.
 - d. Additional forecasting, monitoring, and mitigation measures as appropriate

GBUAPCD – Rule 411

Page 3 of 4
03/05/20

9. The land manager or their designee shall ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and prior to ignition.
 10. For burn projects greater than 250 acres, the land manager or their designee shall perform a post-burn smoke management evaluation.
 11. Vegetation shall be in a condition that will minimize the smoke emitted during combustion when feasible, considering fire safety and other factors.
 12. Material to be burned should be piled where possible unless good silvicultural practices or ecological goals dictate otherwise. Piled material shall be prepared so that it will burn with a minimum of smoke.
 13. If the burn is to be done primarily for improvement of land for wildlife and game habitat, the burn plan applicant shall file with the District a statement from the Department of Fish and Game certifying that the burn is desirable and proper. The Department of Fish and Game may specify the amount of brush treatment required, along with any other conditions it deems appropriate.
 14. Burn plans shall limit or postpone burning, or require mitigation, when the meteorological conditions and smoke impacts may cause or contribute to an exceedance of a state or federal ambient air quality standard or cause a public nuisance.
 15. Vegetation to be burned shall be free of tires, rubbish, tar paper or construction debris, and reasonably free of dirt and soil.
 16. The material to be burned shall be ignited only by devices approved by the California Department of Forestry and Fire Protection, or the local fire protection agency, and ignition shall be as rapid as practicable within applicable fire control restrictions.
 17. All burning shall conform to the applicable jurisdictional fire code(s).
 18. Burning shall be managed to minimize smoke impacts to smoke sensitive areas.
- D. The total amount of material burned in any one day may be limited or postponed by the District, taking into consideration matters which would affect the ambient air quality of the District including current and forecasted air quality conditions; meteorological conditions; the types and amounts of material to be burned; the location and timing of material to be burned; the location of smoke sensitive areas; and the cumulative smoke impacts from all burning activities within and outside the District.

RULE 412. OPEN BURNING OF NON-INDUSTRIAL WOOD WASTE AT CITY OR COUNTY DISPOSAL SITES

Adopted: 09/05/74 Revised: 02/09/81, 11/04/92

- A. No person shall burn non-industrial wood waste on "no-burn" days as announced by the State Air Resources Board for the Counties of Inyo, Mono, and Alpine or when prohibited by the Air Pollution Control Officer.
- B. Burning of non-industrial wood waste at city or county disposal sites shall be restricted to sites above 1,500 feet (above mean sea level), that have been approved for such burning by the Air Pollution Control Officer (APCO) and the California Air Resources Board. Approval shall be based upon the submittal of written documentation for each site which shall include:
1. A copy of the resolution by the applicable city council or county board of supervisors declaring their intention to allow burning at designated sites.
 2. The estimated tonnage and type of material to be burned at each site with the estimated criteria pollutant emissions, broken down by month for a one year period and an analysis of air quality trends showing that the proposed burns will not prevent the achievement or maintenance of the ambient air quality standards.
 3. Location and elevation of the sites to be used for burning.
 4. A copy of a written statement by the owner of the land on which the disposal site is located approving the burn on such land.
 5. Written approval of the fire protection agency having authority over the proposed burn site.
 6. A statement explaining why burning at the disposal site will not create a nuisance. This shall include consideration for the site's proximity to population centers and the prevailing wind pattern.
 7. A statement indicating who is responsible to verify that only non-industrial wood waste is burned and how often inspections shall be made at each site.
- C. Such burning when authorized shall conform to the following criteria:
1. Material to be burned shall be as dry as feasible prior to burning, and shall be free from combustible impurities such as tires, tar paper, rubbish, plastics, demolition or construction debris, and shall be reasonably free of dirt, soil, and visible surface moisture.
 2. Trees and branches over two inches in diameter shall have been dried for at least 10 days prior to burning.
 3. Branches under two inches in diameter and prunings shall have been dried for at least 1 week prior to burning.

4. Exceptions to the foregoing may be made by the fire authority which issues the permits to burn, after notification to the Air Pollution Control Officer, and if the material to be burned is diseased or insect infested and there would be irreparable damage if the foregoing standards were rigidly enforced.
 5. Material to be burned shall be so arranged as to burn with a minimum of smoke.
 6. All burning shall conform to the applicable jurisdictional fire code(s).
- D. The use of oil or tires in connection with the ignition or burning of non-industrial wood wastes is prohibited.
- E. No non-industrial wood waste shall be burned without a permit issued by a fire protection authority having jurisdiction over the proposed burn location. As a condition to the issuance of a permit, each applicant shall provide the information required by the issuing agency on forms prepared jointly by said agency and the District. The permit may place a limit upon the amount of materials to be burned in any one day and the hours of the day during which time the material may be burned. Further, the form of this permit shall contain the following words or words of similar import: 'This permit is valid only on those days during which agricultural burning is not prohibited by the State Air Resources Board or by the Air Pollution Control Officer pursuant to Section 41855 of the Health and Safety Code.'
- F. Burning shall be curtailed when smoke is drifting into a populated area or creating a public nuisance. If smoke from a particular site repeatedly drifts into a populated area or causes a nuisance, the APCO will revoke approval for that site.
- G. The total amount of material burned in any one day, may be limited by the District, taking into consideration matters which would affect the ambient air quality of the District.

[Intentionally left blank.]

Attachment B

Example Form

for Smoke Management Plan

GREAT BASIN UNIFIED APCD APPLICATION TO APPROVE SMOKE MANAGEMENT PLAN

In accordance with the Smoke Management Program for the Great Basin Unified Air Pollution Control District (Air District), this Smoke Management Plan (SMP) serves as an application for SMP approval to comply with Air District Rule 411.C. This SMP application is to be completed by the applicant and submitted to the Air District for review and approval at least 30 days prior to performing the proposed prescribed burn. This SMP application consists of a Project Description page and two sections – A and B. **ALL APPLICANTS MUST COMPLETE THE PROJECT DESCRIPTION PAGE (page 3).** Both sections A and B of the SMP (**pages 5-9**) may need to be completed depending on the burn's potential to impact smoke sensitive areas and the size of the burn. Once approved by the Air District, this SMP serves as a conditional approval to burn.

General Information and Requirements regarding this SMP are provided on **pages 1 and 2**. Terms used in this form have the same meaning as those defined in the Air District's Rule 101 or the California Code of Regulations (CCR), Title 17, Section 80101. Where differences occur, the Air District's definitions apply. **Emission Factors** to assist with calculating burn particulate matter emissions are provided on **pages 11 and 12**. Contact the Air District at (760) 872-8211 if you have questions or need assistance with making these calculations.

The **District Review (page 2)** is for Air District use only, but must be kept intact with the Project Description. The **Project Description** section (**pages 3 and 4**) requests general information and identifies conditions for all prescribed burn projects. It identifies the applicant and relevant contact information, who the land owner is, the project name, project location, burn size, purpose of the burn, type of fuel to be burned, and estimated emissions from the burn. It provides a checklist of additional sections of the SMP that may be filled out and attached. Finally, it requests the preparer's signature, the name of the applicant or authorized representative, and the applicant or authorized representative's signature.

Section A (pages 5-7) must be completed and attached to the Project Description page if the burn has the potential to result in impacts to smoke sensitive areas. Smoke sensitive areas are defined as "populated areas and other areas where the Air District determines that smoke and air pollutants can adversely affect public health or welfare." Such areas can include, but are not limited to, towns and villages, campgrounds, trails, populated recreational areas, hospitals, nursing homes, schools, roads, airports, public events, shopping centers, and Class I Areas (areas that are mandatory visibility protection areas designated pursuant to section 169A of the federal Clean Air Act). Class I Areas in, or near, the Great Unified APCD include; South Sierra Wilderness, John Muir Wilderness, Ansel Adams Wilderness, Mokelumne Wilderness, Yosemite National Park, Kings Canyon National Park, and Sequoia National Park.

Section B (pages 8 and 9) must be completed and attached to the Project Description page if the burn will be greater than 100 acres or will produce more than ten tons of particulate matter. Section B identifies meteorological conditions necessary for ignition, contingency actions that will be taken if smoke impacts begin to occur from the burn, and information on consideration and use of alternatives to burning. A **Post-Burn Evaluation** form is provided on **page 10**. This form is to be used for burns greater than 250 acres or for burns that result in impacts to smoke sensitive areas. It should be filled out after the burn, as appropriate.

Information may need to be extracted from the project burn plan (if available) to supplement the SMP. Air District review of the burn plan is for informational purposes only. When the burn plan is reviewed, the Air District assumes no approval authority or liability for approving the burn plan. The applicant is responsible for assuring firefighter and public safety, which is not the intent of the information included on this form.

General Information and Requirements

SMP Conditions Must Be Met on the Day of the Burn (CCR § 80160(j))

The land manager or his/her designee conducting a prescribed burn is required to ensure that all conditions and requirements stated in the smoke management plan are met on the day of the burn event and prior to ignition. Ignition of a burn project will not occur unless the Air District has authorized the burn for the day of the burn. [Note: CCR § 80120(e) and Air District Rule 411.B.2 provide that the Air District may, by special permit, authorize agricultural burning, including prescribed burning, on days designated by the ARB as no-burn days if the denial of such permit would threaten imminent and substantial economic loss.]

Conditions of Vegetative Material to be Burned (CCR §§ 80160 (m – p))

Material should be:

- ◆ in a condition that will minimize the smoke emitted during combustion when feasible, considering fire safety and other factors
- ◆ piled where possible, unless good silvicultural practices or ecological goals dictate otherwise
- ◆ prepared so that it will burn with a minimum of smoke

Description of Burn Types

Forest Management Burning is the use of open fires, as part of a forest management practice, to remove forest debris or for forest management practices which include timber operations, silvicultural practices, or forest protection practices.

Range Improvement Burning is the use of outdoor fires to:

- ◆ remove vegetation for wildlife or game habitat
- ◆ remove vegetation for livestock habitat
- ◆ remove vegetation for the initial establishment of an agricultural practice on previously uncultivated land

Wildland Vegetation Management Burning is the use of prescribed burning conducted by a public agency, or through a cooperative agreement with a private manager or contract involving a public agency, to burn land predominantly covered with chaparral (as defined in Title 14, CCR §1561.1), trees, grass, or standing brush.

Determination of Smoke Sensitive Areas

Smoke sensitive areas are defined as “populated areas and other areas where the Air Pollution Control Officer (APCO) determines that smoke and air pollutants can adversely affect public health or welfare.” Such areas can include, but are not limited to, towns and villages, campgrounds, trails, populated recreational areas, hospitals, nursing homes, schools, roads, airports, public events, shopping centers, and Class I Areas (areas that are mandatory visibility protection areas designated pursuant to section 169A of the federal Clean Air Act. If a burn is near a populated area, has potential for substantial emissions, has a long duration, or has the potential for poor smoke dispersion, a smoke sensitive area could be impacted and Section A of the SMP should be completed. Burners may obtain Air District assistance in determining if Section A should be completed.

Procedures to Report Public Smoke Complaints to the Air District (CCR § 80160(l))

1. The applicant shall immediately report any air quality smoke complaints received about this burn project to the Air District. A phone call to the District during normal seasonal business hours will suffice. During non-business hours a fax or voicemail message will suffice [(760) 872-6109 (fax), 872-8211 (voice)].
2. The complaint report shall include the following: the location of the smoke impact, a short description of the smoke behavior including wind direction and speed, visibility, and public safety impacts if available

from the complainant.

3. The applicant shall inform the complainant that he or she may also contact the District directly and shall provide the District name, telephone number and address.
4. The applicant shall, in coordination with the Air District, seek resolution for all complaints, as necessary.

Natural Ignition on a No-burn Day (CCR § 80160(h))

When a natural ignition occurs on a no-burn day, the initial “go/no-go” decision to manage the fire for resource benefit will be a “no-go” unless:

1. After consultation with your Air District, the Air District decides, for smoke management purposes, that the burn can be managed for resource benefit; or
2. For periods of less than 24 hours, a reasonable effort has been made to contact the Air District, or if the Air District is not available, the Air Resources Board (ARB); or
3. After 24 hours, the Air District has been contacted, or if the Air District is not available, the ARB has been contacted and concurs that the burn can be managed for resource benefit. A “no-go” decision does not necessarily mean that the fire must be extinguished, but that the fire cannot be considered as a prescribed fire.

FOR GREAT BASIN UAPCD REVIEW **(For District Use Only)**

____ I have reviewed and approved this SMP as a conditional approval, which expires on _____.

____ This burn project is greater than 250 acres and/or is a multi-day burn which requires ARB consultation prior to final approval pursuant to CCR § 80160(g).

Date ARB Notified: _____ Date ARB approval received: _____

Smoke from this fire is expected to impact the following non-attainment or maintenance areas:

Conditions of Approval:

Signature: _____ Date: _____

Name: _____

SMP Project Description (Complete This Page for ALL PRESCRIBED BURNS)¹

1.1 Project Name: _____	Project Location: Report at least one of the following location descriptions and attach a map indicating the project location. 1.8a Legal: T ___ R ___ S ___ M&B ___ 1.8b Lat/Long: Latitude ___ (deg.) ___ (min) ___ (sec) Longitude ___ (deg.) ___ (min) ___ (sec) 1.8c UTM: Zone: ___ N ___ m, E ___ m
1.2 Applicant Name: _____	
1.3 Applicant Address: Street: _____ City: _____ State: _____ Zip: _____	
1.4 Applicant/Field Contact: _____	
1.5 24-hour Phone/Pager: _____	1.9 Project Elevation (feet above msl) Upper: _____ Lower: _____ 1.10 Land Owner Name: _____ Street: _____ City: _____ State: _____ Zip: _____
1.6 Project Location (Counties): _____	
1.7 Nearest Town(s): _____	

- 1.11 Anticipated Time of Year for Burn (Month/Year): _____
- 1.12a Is the Primary Purpose of the Burn for Fire Hazard Reduction? _____
- 1.12b Burn Type (Check one): _____ Forest Management: _____ Range Improvement
 _____ Wildland Vegetation Management _____ Natural Ignition
- 1.13 For Range Improvement Burns Check Vegetation Management Objective:
 _____ Wildlife or Game Habitat Improvement _____ Livestock Habitat Improvement
 _____ Initial Establishment of an Agricultural Practice on Previously Uncultivated Land
- 1.14 Vegetation Type (Percentage): _____ Brush _____ Grass _____ Timber Litter _____ Timber Slash
 _____ Other (Describe): _____
- 1.15 Vegetation Condition: _____ Machine Pile Burn _____ Hand Pile Burn _____ Understory
 _____ Landing Pile Burn _____ Broadcast
- 1.16 Project Area: _____ (acres)
- 1.17 Number of Piles: _____
- 1.18 Average Pile Size: _____
- 1.19 Total Project Fuel Loading: _____ (tons vegetation)
- 1.20 Particulate Matter Emissions: _____ (tons PM10)
 (Use Emissions Factors Tables on pages 7-8 for assistance with emissions calculation)
- 1.21 Emission Factor Table Used or
 EPA-Approved Calculation Method: _____
- 1.22 Preferred Ignition Hours for the Fire: _____
- 1.22 Expected Burn Duration (ignition to complete extinction):
 Total Time: _____ (hours or days)
- 1.23 Fuel Drying Time and
 Conditions prior to ignition: _____
- 1.24 Limitations on Pile Size, Pile Number, and/or Acreage Limitations to Minimize Smoke (complete as appropriate): _____

It is the responsibility of the applicant to ensure that conditions of the SMP are met on the day of the burn. The applicant will obtain authorization to burn from the Air District contact listed below

Agenda Item No. 5 - Attachment 4

¹ If your burn is less than 1 acre with less than one ton particulate matter emissions, and your burn will not impact any smoke sensitive areas, you may complete only this page. Attach appropriate SMP sections for all other burns.

no more than 24 hours prior to ignition.2

1.26 Air District: Great Basin Unified APCD	1.28 Contact:
1.27 Address: 157 Short Street	1.29 24-hour Telephone: (760) 872-8211
Bishop, California 93514	1.30 Fax: (760) 872-6109
	1.31 Email: greatbasin@qnet.com

The applicant will report public smoke complaints to the Air District per the procedures described in the General Information section of this SMP on page 1.

Check as Applicable:

- ☐ **This burn could have an impact on smoke sensitive areas – I have filled out and attached all of Section A.**
- ☐ **This burn could have an impact on smoke sensitive areas and Air District policies require that information on meteorological conditions for ignition and contingency planning be provided – I have filled out and attached line items B.1 and B.2 of Section B.**
- ☐ **This burn is greater than 100 acres (or is estimated to produce greater than 10 tons of particulate matter) – I have filled out and attached all of Section B.**

Preparer's Statement: To the best of my knowledge the information submitted in this application is complete and accurate.

SMP Preparation Date: _____

Preparer's Name (print): _____

Title: _____

Preparer's Phone: (_____) _____ - _____

Preparer's Signature: _____ Date: _____

Name of Authorized Representative in Control of the Property,
if applicable (print): _____

Applicant or Authorized
Representative Signature: _____ Date: _____

SECTION A: AS REQUIRED BY TITLE 17 AND AIR DISTRICT POLICIES, THIS SECTION APPLIES TO ALL BURNS WITH THE POTENTIAL TO IMPACT SMOKE SENSITIVE AREAS (SSAs) *

A.1. Describe locations of SSAs and distances from burn site (miles) – (Also the attached Map#_____ shows SSAs)

A.2 The attached map# _____ provides smoke travel projections for:
_____ Day _____ Night _____ Topographical considerations.

A.3 Has prescribed burning historically occurred in this area? _____ Yes _____ No
_____ Don't Know

A.4 If yes, were there impacts to smoke sensitive areas? _____ Yes _____ No
_____ Don't Know

A.5 If yes, please describe impacts:

A.6 For burns that will occur past daylight hours and/or for more than one day, please provide Air District contact information and a description of contact procedures that will be used to affirm that the burn project remains within the conditions specified in this SMP, and/or whether contingency actions are necessary. The applicant will follow any instructions by the Air District to communicate directly with ARB when necessary. Air District contact (or designee) _____

A.7a Telephone: (_____) _____ - _____

A.7b 24-hour Pager (_____) _____ - _____

A.7c Fax: (_____) _____ - _____

A.7d E-mail: _____

A.8 The applicant will use the frequency and method of contact described below:

The applicant will monitor the burn project for meteorological conditions and smoke behavior before, during, and after the burn using the following techniques and timing:

A.9 Weather Observation (Wind Direction, Wind Speed, and Temperature):

<u>Method</u>	<u>Details</u>
_____ Belt Weather Kit	Location _____ Beginning _____ Interval _____ Ending _____
_____ RAWS	Location _____ Beginning _____ Interval _____ Ending _____
_____ Aircraft	Location _____ Beginning _____ Interval _____ Ending _____
_____ Other	Location _____ Beginning _____ Interval _____ Ending _____
_____ Additional Requirements:	_____
_____	_____
_____	_____

A.9 Smoke Behavior Observations:

<u>Method</u>	<u>Details</u>
_____ Visual	Location _____ Beginning _____ Interval _____ Ending _____
_____ Test Fire	Location _____ Beginning _____ Interval _____ Ending _____
_____ Balloon	Location _____ Beginning _____ Interval _____ Ending _____
_____ Aircraft	Location _____ Beginning _____ Interval _____ Ending _____
_____ PM Monitoring Inst	Location _____ Beginning _____ Interval _____ Ending _____
_____ Additional Requirements:	_____
_____	_____
_____	_____

A.11a The applicant shall begin public notification before the day of burning. The notification shall be on-going until the end of burning. Check which of the following procedures will be used to notify and educate the public about this burn project. _____Television _____Radio
_____Newspaper _____Posters/flyers _____Telephone calls _____Other (Explained in A.11b below)

A.11b The specifics of the notification procedure(s) checked above are as follows:

A.12 The applicant will place appropriate signage at or near burn sites to identify the burn project to the public as noted on the attached map#_____.

Adjacent Air Districts and neighboring state Air Districts which may potentially be impacted by smoke travel or which have previously been impacted by smoke from similar burn projects are listed below.

A.13 Air District Name: _____

A.14 Contact: _____

A.15 Address: _____

A.16 24-hour Telephone: _____

A.17 Fax: _____

A.18 Air District Name: _____

A.19 Contact: _____

A.20 Address: _____

A.21 24-hour Telephone: _____

A.22 Fax: _____.

23 Neighboring State Air District Name: _____

A.24 Contact: _____

A.25 Address: _____

A.26 24-hour _____

Telephone: _____

A.27 Fax: _____

* See General Information on page 1 for determining if your burn has the potential to impact a smoke sensitive area.

** Visual smoke observation refers to observations made through the eyes of designated individuals.

SECTION B: AS REQUIRED BY TITLE 17 AND AIR DISTRICT POLICIES, THIS SECTION APPLIES TO ALL BURN PROJECTS GREATER THAN 100 ACRES OR PRODUCING MORE THAN 10 TONS OF PARTICULATE MATTER

B.1. Meteorological Conditions for Ignition

Source of Meteorological Information: _____

Surface Wind Direction:

Ideal: _____ Acceptable Range: _____ (degrees)

Surface Wind Speed:

Ideal: _____ Maximum: _____ Minimum: _____ (mph)

Transport Wind Direction:

Ideal: _____ Acceptable Range: _____ (degrees)

Relative Humidity:

Ideal: _____ Maximum: _____ Minimum: _____ (%)

Target Mixing Height Parameters: _____

Acceptable Temperature Range: _____ (degrees)

Other Considerations to Assure Acceptable Smoke Dispersion:

- B.2a** Describe contingency actions/methods/procedures applicant will take in the event that serious smoke impacts begin to occur or meteorological conditions deviate from those specified in this SMP (for example: stop ignitions, initiate mop-up, conduct fire suppression – describe in detail):

- B.2b** Describe any applicable interior unit contingency cutoff lines (refer to map# ____ as appropriate):

B.3 An evaluation of alternatives to burning is described below:

_____ It is a part of the environmental documentation required for the burn project pursuant to the National Environmental Policy Act or the California Environmental Quality Act and is either attached to this SMP, is on file with the Air District, or is provided for as agreed to by the Air District. Document location:

_____ Neither a National Environmental Policy Act or the California Environmental Quality Act assessment of alternatives has been performed. Alternatives to reduce fuel load are described in section B.4 – B.9 below.

B.4 Alternatives Considered:

B.5 Alternatives Rejected and Reasons for Rejection:

B.6 Alternatives Used, and Tons of Vegetative Material Treated With Each Alternative:

B.7 Particulate Reduction for Each Alternative Used (tons):

B.8 Total Particulate Reductions from Alternatives Used:

B.9 If this project is greater than 250 acres or smoke impacts occur, the applicant will provide a completed Post Burn Evaluation Form (see page 11) to the Air District within 30 days of project completion.

B.10 For burns greater than 250 acres, Sections A.9 and A.10 describe the site monitoring requirements.

**Post-Burn Evaluation
For Burns Greater Than 250 Acres
or Burns For Which Complaints or Smoke Impacts Occurred***

Section A. General Information:

Date of Burn: _____ Burn Location: _____
Number of Acres Burned: _____ Estimated Actual PM Emissions: _____ (tons)
Burner Name: _____
Burner Address: _____
Burner Phone Number: _____
Burner Email: _____

1. Did the burn remain within the conditions specified in the Smoke Management Plan? _____
2. Were there any complaints or adverse smoke impacts? _____ If so, complete Section B below.
3. Lessons learned (Optional) (Provide attachment if desired):

Section B. For Burns That Had Smoke Impacts, Complete The Following:

1. Describe adverse smoke impacts below (add attachment if needed):

2. Were there any complaints from the public? _____ If so, how many and from whom:

3. What Air Districts were Notified (who, when, and at what phone number(s))?

4. Lessons learned (add attachment if needed):

5. Attach all smoke observation and weather data collected before, during, and after the burn. See collection methods checked in sections A.9 and A.10 of the burn plan for relevant data.

* As required by title 17 and air district policies.

Table 1 PM-10 EMISSIONS CALCULATIONS FOR PILES

1. Choose the pile size most representative of the piles on your burn site.
2. Multiply the number of piles in your project with the corresponding "Tons of PM10/Pile" value to get the total PM-10 tonnage.

PM10 EMISSIONS FOR SPECIFIED PILE SIZES		
PILE SIZE (in feet)	Pile Tonnage	TONS OF PM10/PILE
4' diameter x 3' height	0.056	0.0005
5' diameter x 4' height	0.12	0.001
6' diameter x 5' height	0.21	0.002
8' diameter x 6' height	0.45	0.004
10' diameter x 6' height	0.71	0.007
12' diameter x 8' height	1.3	0.01
15' diameter x 8' height	2.1	0.02
20' diameter x 10' height	4.7	0.04
25' diameter x 10' height	7.4	0.07
50' diameter x 10' height	29	0.3
Pile Tonnage calculated using paraboloid volume formula ^a multiplied by 30 lbs/cu.ft, multiplied by 0.2 packing ratio ^b		
U.S. Forest Service's Conformity Handbook, Table 6 -- PM10 Emissions Factor of 19.0 pounds/ton of fuel burned - average pile and burn slash		
Revised 2/13/2001		

a. Formula used for Paraboloid Volume (cu.ft.) = $3.1416 \times [\text{height} \times (\text{diameter})^2] / 8$ (see Reference b. below).

b. USDA (2/1996). Forest Service General Technical Report. Report Number: PNW-GTR-364.

Table 2 PM 10 EMISSION CALCULATION FOR BURNING OF MULTIPLE FUEL TYPES^{1,2}

Section 80160 (b) of Subchapter 2 Smoke Management Guidelines for Agricultural and Prescribe Burning, Title 17, California Administrative Code states, "requires the submittal of smoke management plans for all burn projects greater than 10 acres in size or estimated to produce more than 1 ton of particulate matter". To determine what the particulate matter (PM 10) amount is of your burn project please use the equation below and review the following examples.

Information needed for PM 10 Calculations:

- | | |
|---|--|
| a. VT = Vegetation type | b. ACRES VT = Estimated number of acres for VT |
| c. FL est. = Estimated fuel loading in VT TONS per ACRE | d. EV = PM10 emission/ton of fuel |

Calculating PM10 Emissions from Prescribed Burning of multiple vegetation types:

PM10 ton(s) emissions per VT = (number of acres VT) (FL tons per acre) (Emission Value (EV)) = _____ ton(s)/VT

PM10 ton(s) emissions per VT = (number of acres VT) (FL tons per acre) (Emission Value (EV)) = _____ ton(s)/VT

Sum Total is the Estimated PM 10 for the project = _____ ton(s)/project

VEGETATION TYPE(S)	ACRES (VT) x	FL est.	x	EV ¹	PM10 EMISSIONS (ton(s))
Basing Sage/Low Sage	() x	()	x	(0.010) =	_____
Ceanothus	() x	()	x	(0.010) =	_____
Chamise	() x	()	x	(0.009) =	_____
Giant Sequoia	() x	()	x	(0.007) =	_____
Grass/Forb	() x	()	x	(0.007) =	_____
Hackberry Oak	() x	()	x	(0.005) =	_____
Hardwood (Stocked)	() x	()	x	(0.003) =	_____
Hardwood (Non-stocked)	() x	()	x	(0.003) =	_____
Jeffrey Pine/Knobcone	() x	()	x	(0.007) =	_____
Live Oak (Canyon)	() x	()	x	(0.007) =	_____
Live Oak (Interior)	() x	()	x	(0.007) =	_____
Lodgepole Pine	() x	()	x	(0.007) =	_____
Manzanita (Productive Brush)	() x	()	x	(0.009) =	_____
Mixed Chaparral/Montane	() x	()	x	(0.008) =	_____
Mixed Conifer	() x	()	x	(0.006) =	_____
Oak (Black)	() x	()	x	(0.005) =	_____
Oak (Blue)	() x	()	x	(0.003) =	_____
Oak (White)	() x	()	x	(0.003) =	_____
Pinyon Pine	() x	()	x	(0.007) =	_____
Ponderosa Pine, Gray Pine	() x	()	x	(0.007) =	_____
Red Fir	() x	()	x	(0.007) =	_____
Wet Meadow	() x	()	x	(0.004) =	_____
Willow	() x	()	x	(0.007) =	_____
Sum Total of the Estimated PM10 for the project in <u>tons/project</u> =					_____

1. See Table 3 on next page for values used to calculate EVs.
2. For vegetation types not listed, contact Air District for assistance with determining appropriate emission factors.

EMISSION VALUES (EVs) FOR BURNING OF MULTIPLE VEGETATION TYPES*

Calculation of PM10 emission values = (% combustion) x (PM10 emission lbs/ton) x (1 ton/2000 lbs)*

VEGETATION	%Combustion	PM Emissions (lbs/ton fuel)	Conversion Factor	PM EMISSION VALUE (PM10 tons emissions/ton fuel)
Basing Sage/Low Sage	= (1.0) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.010
Ceanothus	= (1.0) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.010
Chamise	= (0.9) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.009
Giant Sequoia	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Grass/Forb	= (1.0) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Hackberry Oak	= (0.4) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.005
Hardwood (Stocked)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Hardwood (Non-stocked)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Jeffrey Pine/Knobcone	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Live Oak (Canyon)	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Live Oak (Interior)	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Lodgepole Pine	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Manzanita (Productive Brush)	= (0.9) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.009
Mixed Chaparral/Montane	= (0.8) x	(20.17 lbs/ton)	x (1 ton/2000 lbs)	= 0.008
Mixed Conifer	= (0.6) x	(20.5 lbs/ton)	x (1 ton/2000 lbs)	= 0.006
Oak (Black)	= (0.4) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.005
Oak (Blue)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Oak (White)	= (0.4) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.003
Pinyon Pine	= (0.6) x	(22 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Ponderosa Pine, Gray Pine	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Red Fir	= (0.6) x	(23.1 lbs/ton)	x (1 ton/2000 lbs)	= 0.007
Wet Meadow	= (0.6) x	(15 lbs/ton)	x (1 ton/2000 lbs)	= 0.004
Willow	= (0.6) x	(25 lbs/ton)	x (1 ton/2000 lbs)	= 0.007

* Percent combustion and PM10 emission factors for various fuel types derived from Table 8, Section 6, "Air Quality Conformity Handbook" from the USDA-Forest Service Air Resources / Fire Management Pacific Southwest Region dated November 1995.

** These are the vegetation's estimated emissions values(EV) from the vegetation type as determined above to be use when the burn operator provides the vegetation's fuel loading estimate per acre.

*** For additional information on emissions factors, see EPA document AP-42: "Compilation of Air Pollutant Emission Factors. Volume 1: Stationary Point and Area Sources," Fifth Edition, AP-42, January 1995, U.S. EPA. Table 2.5-5.

Attachment C

Example Special Permit Form to Burn on a No-Burn Day

No-Burn Day

Burn Permit Application

Permit # _____

Day of Burn _____

Owner/Operator _____ Date Requested _____

Address _____ Zip _____ Phone _____

Location of Burn _____ Amount in Acres/Tons _____

Material to be Burned _____ Drying Time _____ Days

Ag Burn Permit No. _____ Fire District _____

Ambient AQ standard exceedance forecast for today? _____ Downwind Impact? _____

How many no-burn days occurred in the 7 days prior to today? _____

State below the reasons why denying you a permit to burn TODAY - on a No-Burn Day - "would threaten imminent and substantial economic loss" pursuant to Section 41862 of the California Health & Safety Code.

(Continue on reverse if necessary)

Estimate dollar value of economic loss you will incur if burning is not completed TODAY.

Did you attempt to burn this material before today? _____ If not, why not? _____

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT pursuant to Section 118 of the California Penal Code:

Executed on (date) _____ at _____, California

Signature _____

**PERMIT VALID
ONE DAY ONLY**

Mail Copy to: Compliance Division
Air Resources Board
PO Box 2815

Sacramento, CA 95812
Agenda Item No. 5 - Attachment 4

200305

AQ Exceedance _____

Permit Denied _____

Permit Approved _____

Signed _____

APCD

Great Basin Unified Air Pollution Control District
Smoke Management Program
PROCEDURES CHECKLIST

This document provides a summary of the procedures and regulations for the Land Management Agencies (LMAs) and the Great Basin Unified Air Pollution Control District (District) in the handling of prescribed burning and wildland fires. Specific requirements may be found in the District Smoke Management Program, District Rule 411- Wildland Vegetation Management Burning, and Title 17 of the California Code of Regulations.

PRESCRIBED BURNING - PLANNED IGNITIONS

Annually

- ☐ Annual meeting or call between LMA and the District
- ☐ LMA submit a list of planned burn projects to the District
- ☐ Annual report submitted to CARB by the District
- ☐ As required, the District will invoice applicable fees for LMA to pay

30 Days Before Desired Burn Date

- ☐ For all burn projects greater than 1 acre in size or estimated to produce more than 1 ton of particulate matter, the LMA will submit a Smoke Management Plan (SMP) containing the required information via the Prescribed Fire Information Reporting System (PFIRS) at <https://ssl.arb.ca.gov/pfirs/> or via another agreed upon method for review and approval by the District. If an SMP is returned, comments will be provided specifying necessary revisions. The LMA will revise and resubmit.

At least 3 Days Before Desired Burn Date

- ☐ LMA will submit an Ignition Request specifying the amount, timing, and location of the burning to be completed to the District via PFIRS or other previously agreed upon method at least 3 days before the desired burn date. For projects involving significant resources, the LMA is encouraged to contact the District earlier if possible.

1 Day Before Desired Burn Date

- ☐ LMA will receive a decision on the ignition request via PFIRS, or another communication method such as email or phone call, from the District. Authorization may: 1) limit total amount of material to be burned or 2) be contingent upon, or subject to change, based on ARB burn day determination, air quality conditions, meteorological conditions, or other factors.

Day of Burn

- ☐ If required, LMA will contact the District for final burn authorization.
- ☐ LMA will ensure all conditions and requirements in the SMP are met throughout the burn.
- ☐ LMA and District shall inform each other of public complaints as soon as reasonably possible.
- ☐ LMA will notify the District if the burn is postponed or canceled.

Post Burn

- ☐ LMA shall submit a completed acreage report via PFIRS
- ☐ For projects greater than 250 acres, the LMA shall perform a post-burn smoke management evaluation

**Great Basin Unified Air Pollution Control District
Smoke Management Program
PROCEDURES CHECKLIST**

WILDLAND FIRES - UNPLANNED IGNITIONS

Annually

- ☐ In annual submittal of burn project to the District, LMA shall include areas considered for wildland fire managed for resource objectives.

Within 24 Hours of Confirmed Unplanned Ignition

- ☐ Contact the District to discuss the particulars of the fire being considered for resource objectives. Receive District favorable/unfavorable support to manage fire for resource objectives. For fires deemed unfavorable by the District, LMA will implement strategies to limit or eliminate adverse air quality impacts.

Within 72 Hours of Fire Managed for Resource Benefit Greater than 10 acres in Size

- ☐ LMA will submit SMP via PFIRS or another agreed upon method for review and approval by the District. SMPs for unplanned or naturally-ignited fires managed for resource benefits shall include:
 - Incorporation of air quality management considerations in fire management documents and decisions.
 - Adaptive management based on forecasted and monitored smoke concentrations to match emissions to dispersion opportunities. The District may require limiting or postponing ignitions to avoid cumulative smoke impacts, prevent public nuisance, and prevent violations of the ambient air quality standards.
 - Public notification and messaging methods.
 - Additional forecasting, monitoring, and mitigation measures as appropriate
- ☐ Participate daily in the 1300 hours conference call with detailed updates on wildland fire activity.
- ☐ Coordinate and communicate with District to best time planned ignition activities to dispersion activities.

SMOKE MANAGEMENT PROGRAM Addendum No. 1 to the 2001 Negative Declaration

February 3, 2020

Introduction and Summary

This Addendum has been prepared by the Great Basin Unified Air Pollution Control District (District) pursuant to the California Environmental Quality Act (CEQA) to address amendments to the District's Smoke Management Program and District Rule 411- Wildland Vegetation Management Burning in Wildland and Wildland/Urban Interfaces. In 2001, the Smoke Management Program was adopted and Rule 411 was revised, along with revisions to the District's other rules regarding open outdoor burning. In developing and adopting the Smoke Management Program and revised rules, an Initial Study was prepared and the District subsequently prepared and certified a Negative Declaration (November 7, 2001) for the Smoke Management Program (State Clearing House #2001092068).

The District's proposed amendments to Rule 411 and the Smoke Management Program are minor technical changes and additions to clarify the language to be consistent between the Smoke Management Program and District Rule 411, as well as to be consistent with Title 17 of the California Code of Regulations, Smoke Management Guidelines for Agricultural and Prescribed Burning. The amendments also remove the prohibition from burning on Sundays, Holidays and the last Saturday in April. This change is to provide additional days such that burning can be matched with the best dispersion conditions to minimize smoke impacts in accordance with the Smoke Management Program and Rule 411. With the incorporation of these amendments, the Smoke Management Program and Rule 411 do not differ significantly from the project that was analyzed in the 2001 Initial Study and Negative Declaration. In accordance with Section 15164 of the CEQA Guidelines, the District has prepared this Addendum. The modifications are minor changes and none of the changes will result in new environmental effects. Additionally, there are no changes in circumstances or new information that would otherwise warrant any subsequent environmental review under Public Resources Code section 21166 or CEQA Guidelines section 15162. Thus, the District has determined the existing 2001 Initial Study and Negative Declaration adequately address the potential environmental impacts of the revisions to the District's Smoke Management Program and District Rule 411, and no further environmental review is necessary.

Project Description and Background

The District's Smoke Management Program was developed in 2001 as required by Title 17 of the California Code of Regulations. The Smoke Management Program was developed in cooperation with the California Air Resources Board, public and private land managers, and fire protection authorities to minimize adverse air quality impacts related to smoke from prescribed

burning in Inyo, Mono, and Alpine counties. The District's open burning rules (Rules 101, 405-412) were revised in 2001 along with the adoption of the Smoke Management Program.

The Smoke Management Program and associated open outdoor burning rules were adopted to reduce and manage the impacts of the air quality emissions associated with the agricultural and prescribed burning activities. The Smoke Management Program is intended to benefit the general public by reducing the number and/or duration of impacts on air quality from air emissions caused by agricultural and prescribed burning and the resulting degradation in air quality that may occur.

Objective and Analysis of the Proposed Modifications

The District's proposed amendments to Rule 411 and to the Smoke Management Program are primarily revisions to clarify the language and to provide consistency between the Smoke Management Program and District Rule 411, as well as to be consistent with Title 17 of the California Code of Regulations, Smoke Management Guidelines for Agricultural and Prescribed Burning.

The revisions to the Smoke Management Program and District Rule 411 include the removal of redundant sections and changes to clarify and provide consistency between the Smoke Management Program and Rule 411 such that burning shall be managed to minimize smoke impacts to populated areas, protect public health, and to prevent public nuisance. Additional changes are incorporated to clarify the steps and requirements for submission of Smoke Management Plans and for Daily Burn Authorizations. The changes are also intended to provide consistency between the Smoke Management Program and Rule 411 and Title 17 of the California Code of Regulations. Revisions have also been made to clarify the requirements for Smoke Management Plans for unplanned or naturally ignited wildland fires managed for resource benefits. Guidelines for cross-jurisdictional smoke impacts were also added. The Smoke Management Program and Rule 411 have also been amended to remove the prohibition from burning on Sundays and holidays. This change has been made to provide additional days such that opportunities for burning can be matched with the best dispersion conditions in order to minimize smoke impacts. Restricting the number of available days in a year that burning could occur limited the options for matching the best dispersion conditions with burning activities, and was not in alignment with the purpose of the Smoke Management Program, District Rule 411 and Title 17 of the California Code of Regulations.

The District has reviewed the proposed amendments and determined there are no changes to the environmental impacts, or lack of impacts, that were identified in the 2001 Initial Study and Negative Declaration including but not limited to impacts to aesthetics, agricultural resources, air quality, biological resources, cultural resources or water quality.

Legal Standards and Addendum Determination

Under CEQA Guidelines section 15164, an addendum to a previously certified negative declaration shall be prepared if only minor technical changes or additions are necessary or none of the conditions described in section 15162 calling for the preparation of a subsequent negative declaration or Environmental Impact Report (EIR) have been met. If these conditions have not been met, Public Resources Code section 21166 states that no subsequent or supplemental EIR is required. The District has evaluated each of the conditions of section 15162 and finds that none

of them have been met. As explained above, the amendments do not involve new significant environmental effects, a substantial increase in the severity of previously identified effects, or substantial changes to the circumstances under which the project is undertaken. No new information has become available that shows new significant effects, significant effects substantially more severe than previously discussed, or additional or modified mitigation measures.

Conclusion

Based on a review of the 2001 Negative Declaration and Initial Study and the environmental assessment presented in this Addendum, the District has determined no subsequent negative declaration or EIR is required as the amendments to the Smoke Management Program and District Rule 411 are minor technical changes and additions and no new significant environmental effects would result from the approval of the amendments.

RESOLUTION 2020-01

RESOLUTION OF THE GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT ADOPTING REVISIONS TO THE SMOKE MANAGEMENT PROGRAM AND RULE 411

WHEREAS, the District Board has conducted a public hearing on the adoption of the revision to the Smoke Management Program and District Rule 411, and public comment, both written and verbal, has been allowed in accordance with California Health and Safety Code §40725- 40726,

WHEREAS, notice to the public and to the State Air Resources Board was duly and timely given of this public hearing on the adoption of revisions to the District Smoke Management Program and District 411 - Wildland Management Burning, in accordance with California Health & Safety Code §40725, and

WHEREAS, in accordance with California Health and Safety Code §40923, in January 2020 the District did prepare, and the Governing Board did approve, a list of planned rule revisions that included the Smoke Management Program and Rule 411, and

WHEREAS, the District prepared and made available for review a written analysis of the revisions as required by Health & Safety Code §40727.2, and

WHEREAS, the revisions to the Smoke Management Program and Rule 411 are consistent with and not in conflict with or contradictory to, any existing statutes, court decisions, or State or federal regulations, and

WHEREAS, revisions to the Smoke Management Program and Rule 411 are written so that persons directly affected by it can easily understand its meaning, and

WHEREAS, the California Health and Safety Code Section §40727 requires the District Board to make findings of necessity, authority, clarity, consistency, nonduplication, and reference before adopting, amending, or repealing a rule, and

WHEREAS, an Addendum to the 2001 Negative Declaration meeting the requirements of the California Environmental Quality Act has been prepared, indicating there is no substantial evidence that the proposed revisions may have a significant effect upon the environment, and

WHEREAS, the California Health and Safety Code Section §40727 (g) allows a district to comply with subdivision (a) by making only one finding if the subject rule does not impose new emission limits or standards, make existing limits or standards more stringent, or impose new or more stringent monitoring, reporting, or recordkeeping requirements, and

NOW, THEREFORE BE IT RESOLVED, that the Great Basin Unified Air Pollution Control District Board finds and determine to be true each necessary finding and statement of fact, and hereby adopts and promulgates the revisions to the Smoke Management Program and Rule 411, and

BE IT FURTHER RESOLVED, the Governing Board of the Great Basin Unified Air Pollution Control District Board hereby authorizes and directs the Air Pollution Control Officer to execute on behalf of the District the CEQA Addendum for the revisions to the Smoke Management Program and Rule 411, to pay applicable filing fee, and to file or record a notice of determination reflecting that action as provided by applicable law.

BE IT FURTHER RESOLVED, that the District shall prepare and maintain a record of this rule and program revision in accordance with Health & Safety Code Section §40728.

DONE by the Governing Board of the Great Basin Unified Air Pollution Control District this 5th day of March 2020.

AYES:

NOES:

ABSENT:

ABSTAIN:

Tori DeHaven, the Clerk of the Governing Board of the Great Basin Unified Air Pollution Control District, hereby certifies that the above foregoing resolution was duly and regularly adopted by said District at a regular meeting thereof held on the 5th day of March 2020 and passed by a _____ vote of said board.

IN WITNESS WHEREOF I have here unto set my hand and seal this March 5, 2020.

Tori DeHaven, Clerk of the Governing Board



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537
Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Tori DeHaven, Clerk of the Board

Subject: Approval of the January 9, 2020 Special Governing Board Meeting Minutes

Summary:

Attached for the Board's approval are the minutes from the January 9, 2020 special meeting held in Bishop, California.

Board Action:

Staff recommends that the Board review and approve the minutes from the January 9, 2020 meeting.

Attachment:

1. January 9, 2020 minutes

GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT
GOVERNING BOARD MINUTES

January 9, 2020

(All Meetings Are Mechanically Recorded)

The Great Basin Unified Air Pollution Control District Governing Board of the Counties of Alpine, Inyo, and Mono, State of California met at 10:00 am on January 9, 2020, in the Los Angeles Department of Water and Power Multipurpose Room at 300 Mandich Street, in Bishop, California 93514.

Governing Board members present:

Matt Kingsley, Board Chair, Inyo County
Fred Stump, Board Vice Chair, Mono County
Dan Totheroh, Inyo County
John Peters, Mono County
Ron Hames, Alpine County
David Griffith, Alpine County
John Wentworth, Town of Mammoth Lakes

Governing Board members absent:

None.

A quorum was present.

GBUAPCD staff present:

Phill Kiddoo, Air Pollution Control Officer
Ann Logan, Deputy Air Pollution Control Officer
Tori DeHaven, Clerk of the Board
Susan Cash, Administrative Projects Manager
Jacklyn Bryan, Air Quality Specialist I
Tom Schaniel, Air Quality Specialist I

Members of the public included: (as indicated by voluntary sign-in)

Nelson Mejia, City of Los Angeles, Department of Water & Power
Rhonda Duggan, Mono County District 2 Supervisor Candidate
Liz and Michael O'Sullivan, Mono County Residents
Taro Pusina, Inyo National Forest
Cindy Duriscoe, Big Pine Paiute Tribe

Agenda Item #1
Call to Order
Pledge of
Allegiance

Board Chair Kingsley called to order the regular meeting of the Governing Board at 10:00 a.m.

Board member Peters then led the Pledge of Allegiance.

A moment of silence was taken in recognition of Earl Wilson.

Agenda Item #2
Public Comment
on Matters not on
the Agenda
(No Action)

Board Chair Kingsley asked for public comment on items not on the agenda at 10:02 am.

No comment was offered.

Agenda Item #3
Consent Items
(Action)

Board member Griffith clarified, in the November 7, 2019 minutes item no. 9, he had meant to say that the Washoe Tribe, not Alpine County, was working to get a monitoring station.

Ms. DeHaven, Clerk of the Board, noted the clarification and will review the recording to see if any change is needed in the minutes.

(following the meeting and upon review of the recording, the Clerk was able to confirm that the minutes are correct in that they are a reflection of what was said at the time and will stand as approved)

Motion (Totheroh/Hames) approving consent items a through f as follows:

- a. Approval of the November 7, 2019, Regular Governing Board Meeting Minutes
- b. Approval of Proposed 2020 District Rule and Policy Adoption Schedule
- c. Award of Bid and Authorization to Purchase One (1) New High-Clearance 4-door 4-Wheel Drive Sport Utility Vehicle, Bid Number 2019-V1 (Action)
- d. Award of Bid and Authorization to Purchase One (1) New High-Clearance 4-door All-Wheel-Drive Hybrid Sport Utility Vehicle, Bid Number 2019-V2 (Action)
- e. Approval of District Lactation Accommodation Policy Per SB 142
- f. Adoption of Publicly Available Pay Schedule for Fiscal Year 2019/2020 as Required by the California Public Employees' Retirement System (CalPERS)

Ayes: Board Members – Kingsley, Totheroh, Stump, Hames, Griffith, Peters, Wentworth

Noes: 0

Abstain: 0

Absent: 0

Motion carried 7/0 and so ordered.

B/O #200109-03

Agenda Item #4
Potential
Revisions to the
District's Smoke
Management
Program and
Associated Open
Outdoor Burning
Regulations
(No Action)

APCO Kiddoo introduced the item.

DAPCO Logan gave a brief presentation as outlined in the Board Packet.

Discussion continued between the Board and staff.

Board Chair Kingsley asked for public comment at 10:23 am.

Ms. Liz O’Sullivan, Mono County resident, noted that air quality has gone down in the thirty years that she has lived here. She stated that the Clean Air Act is trampled frequently and asked that human health be considered when considering policies. She explained that she is skeptical about why we need to implement this plan.

Mr. Michael O’Sullivan, Mono County resident, noted that this is a profoundly difficult issue with two competing interests between the regulatory agency and the federal agencies. He stated that people die from regulation failures. There are lasting effects of exposure to PM2.5. He encouraged the Board to continue to maintain and regulate air quality.

Mr. Taro Pusina, Inyo National Forest, acknowledged that all people and agencies involved want to protect public health and safety. Preventing smoke is not an option as vegetation continues to grow and burning is necessary in order to manage it. The agencies are proposing to use the best available science in order to reduce impacts.

The Board acknowledged the public’s concerns as well as the responsibilities of the agencies involved.

Agenda Item #5
Public Safety
Power
Shutdowns and
Emergency
Generators
(No Action)

APCO Kiddoo presented on the item as outlined in the Board Packet and as discussed in previous Board meetings.

Discussion between the Board and staff continued. The Board expressed concerns about the use of British Thermal Units within the fee schedule as well as how generators that serve multiple locations can be permitted. Staff noted that a fee analysis could be done. Also, staff does not see the need to expand exemptions beyond current specifications: fire districts, law enforcement, and hospitals. The Board expressed that they do not see a need for a fee analysis at this time. If in the future PSPS issues cause staff to reconsider an analysis, staff should bring the item back to the Board.

Agenda Item #6
Owens Lake
Phase 9/10 Dust
Control Update
(No Action)

APCO Kiddoo gave a brief update, back in May 2018 District staff brought to the Board the Reasonable Further Progress Report (RFP), also known as a Quantitative Milestone Report which is required by the California Clean Air Act (CAA), to report on whether or not the milestones, as specified in the State Implementation Plan (SIP) have been reached. The milestone of the 2016 SIP, construction of the Phase 9/10 dust control mitigation project at Owens Lake, has been reached. The City of Los Angeles Department of Water and Power continues to work on required Best Available Control Measure Managed Vegetation dust control area performance criteria.

Agenda Item #7
Consider
Appointing an
Alternate to the
District Hearing
Board
(Action)

Motion (Stump/Peters) appointing Mr. John Connolly to the District’s Hearing Board to serve as alternate for a term of three-years.

Ayes: Board Members – Kingsley, Totheroh, Stump, Hames, Griffith, Peters, Wentworth

Noes: 0

Abstain: 0

Absent: 0

Motion carried 7/0 and so ordered.

B/O #200109-07

Agenda Item #8
Informational
Items
(No Action)

No questions or comments.

Agenda Item #9
Board Member
Reports
(No Action)

Board member Peters: Nothing to report.

Board Vice Chair Stump: Thanked Alpine County regarding the Burn Boss and future fuels projects.

Board member Totheroh: Nothing to report.

Board member Wentworth: An entrepreneur named Janet Hatfield, from the Plumas Corporation, convened a discussion in Mammoth Lakes with the local ranger district there about doing a very large very significant fuels treatment project all around the Town of Mammoth Lakes.

Board member Griffith: Humboldt-Toiyabe is working on a forest-wide categorical exclusion for prescribed fire. The Alpine Biomass Collaborative is trying to arrange for a presentation for the public on prescribed burning at their April 7th meeting; the GBUAPCD is invited to present as well.

Board member Hames: Offered the use of the Burn Boss to the other represented counties and the Town of Mammoth Lakes.

Board Chair Kingsley: Nothing to report.

Agenda Item #10
Air Pollution
Control Officer's
Report
(No Action)

APCO Kiddoo introduced the District's newest employees: Mr. Tom Schaniel and Ms. Jacklyn Bryan, both Air Quality Specialists, who have replaced Jan Sudomier and Jon Becknell who recently retired.

Agenda Item #11
CLOSED
SESSION

The Board convened into closed session at 11:45 am.

The Board reconvened into open session at 12:08 pm.

**CLOSED SESSION – CONFERENCE WITH LEGAL COUNSEL –
EXISTING LITIGATION:**

- a. Russell Covington; Robert Moore; Randy Sipes; Randal Sipes, Jr.; Laborers' International Union of North America Local Union No. 783 vs. Great Basin Unified Air Pollution Control District; Mono County Superior Court, Case No. CV140075; pursuant to

subdivision (a) of Section 54956.9 of the California Government Code.

Report: Nothing to report.

Adjournment The meeting was adjourned by Board Chair Kingsley at 12:08 pm. The Board will reconvene in open session at 10:00 am, on Thursday, March 5, 2020, in Mono County California.

Board Chair

Attest:

Tori DeHaven, Board Clerk



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Susan Cash, Administrative Projects Manager

Subject: Waiver of District Rule 1102 Annual \$0.55 Per Capita Town and Counties
Assessment for Fiscal Year 2020-2021

Summary:

Section 40701.5 of the California Health and Safety Code provides for expenses of an air pollution control district to be met by, among other things, an annual per capita assessment on the counties and cities that make up a district. District Rule 1102 provides for each of the District's three counties and the Town of Mammoth Lakes to help fund District programs by paying \$0.55 per capita annually. Based on the latest U.S. Census Bureau population estimates (2018), the annual assessment amounts would be as listed below. Since 1992, the District Board has suspended the collection of these contributions. The decision to waive the contributions for a given fiscal year is made on an annual basis. The waiver decision must be made by the Governing Board and should occur before the budget is finalized.

<u>Member Agency</u>	<u>2018 pop</u>	<u>@ \$0.55 ea.</u>
Alpine Co.	1,101	\$ 606
Inyo Co.	17,987	9,893
Mono Co.	6,123	3,368
Mammoth Lakes	<u>8,127</u>	<u>4,470</u>
Totals	33,347	\$18,337

Fiscal Impact:

Approving the waiver would reduce General Fund (GF) revenues in FY 2020-21 by \$18,337, however, it is not expected to have a significant impact on the GF budget. The estimated 2020-2021 annual budget for General Fund operations (non-SB270, non-special) is \$809,500. Waiver of the capita fee is assumed in the forecasted General Fund revenue in FY 2020-2021, and the budget is balanced without the per capita fee.

Board Action:

Staff recommends that the Board waive the Rule 1102 annual per capita fee for the 2020-2021 fiscal year.



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Susan Cash, Administrative Projects Manager

Subject: Waiver of Consumer Price Index Increase to District Fees for Fiscal Year 2020 - 2021

On May 11, 2017, the Governing Board adopted a policy wherein if the General Fund reserve fund amount exceeds thirty-three (33%) of General Fund annual operating costs (less special funds), then action is to be taken to waive the automatic Consumer Price Index (CPI) increase for District permit fees each year. The CPI waiver is to be based on the adopted final budget (less special funds) of each year. Provided the draft District budget on today's agenda is adopted and the current General Fund reserves remain as stated in the budget, the Governing Board may waive the automatic CPI increase for District permit fees during fiscal year 2020-2021 pursuant to the District Reserve Fund Policy adopted May 11, 2017. The proposed General Fund budget for FY 2020-2021 without special funds is \$809,500 and the General Fund Reserve as of January 31, 2020 is \$3,339,582.

Fiscal Impact:

The fee waiver is already incorporated in the 2020-2021 draft budget on today's agenda. The foregone CPI increase lowered anticipated General Fund revenue by approximately \$10,500.

Board Action:

Staff recommends that the Governing Board waive the automatic Consumer Price Index increase for District permit fees based on the draft FY 2020-2021 General Fund budget (less special funds) for the 2020-2021 fiscal year and amount of current General Fund Reserve funds.



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

www.gbuapcd.org

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Grace A. McCarley Holder, Senior Scientist

Subject: Approval of Purchase Order with Greenheart Farms, of Arroyo Grande, California, a Sole-Source Provider, for Propagation and Delivery of 10,000 Native Shrubs for the Keeler Dunes Project for an Amount Not to Exceed \$29,489.08.

Summary:

This Board report is for consideration and approval of a purchase order with Greenheart Farms of Arroyo Grande, California for propagation and delivery of 10,000 native shrubs for the Keeler Dunes Dust Control Project. Greenheart Farms has grown out plants previously for the Keeler Dunes Project in 2016, 2017, and 2019. Greenheart Farms is designated as a sole source provider for providing native shrubs for the project due to the high-quality plants that they produced and overall cost.

In January 2020, District staff requested a quote from Greenheart Farms for growing out 10,000 native shrubs for the project. The quote includes the grow out of four species of native shrubs using seed collected from the Owens Lake area. Plants will be grown out in 2-inch x 10-inch plant containers and delivered to the District's Keeler office in October 2020 so they can acclimate to the local conditions before being installed in the project in January/February 2021.

Fiscal Impact:

There is \$30,000 budgeted in the Keeler Dunes Project budget for 2019-2020 for plant propagation. The cost quote from Greenheart Farms for propagation and delivery of 10,000 native shrubs totals \$29,489.08. Approval of the purchase order with Greenheart Farms would encumber those funds from the Keeler Dunes Project 2019-2020 budget and allow the plants to be started in the spring of 2020.

Consent Agenda (Action) - Approval of Purchase Order with Greenheart Farms, of Arroyo Grande, California, a Sole-Source Provider, for Propagation and Delivery of 10,000 Native Shrubs for the Keeler Dunes Project for an Amount Not to Exceed \$29,489.08

March 5, 2020 – Agenda Item No. 6d – Page 1

Board Action:

Staff recommends the Governing Board approve and authorize the Air Pollution Control Officer to sign the attached purchase order with Greenheart Farms of Arroyo Grande, California for propagation and delivery of 10,000 native shrubs for the Keeler Dunes Dust Control Project for an amount not to exceed \$29,489.08 with the funds to come from the Keeler Dunes Project budget.

Attachment:

1. Purchase Order with Greenheart Farms for 10,000 native shrubs

Consent Agenda (Action) - Approval of Purchase Order with Greenheart Farms, of Arroyo Grande, California, a Sole-Source Provider, for Propagation and Delivery of 10,000 Native Shrubs for the Keeler Dunes Project for an Amount Not to Exceed \$29,489.08

March 5, 2020 – Agenda Item No. 6d – Page 2



PURCHASE REQUISITION/ORDER

2019/20- GH

Date: 1/28/2020

Great Basin Unified Air Pollution Control District

157 Short Street
 Bishop, California 93514
 760-872-8211 Fax: 760-872-6109
 Tax ID # 43-2106258

Vendor:		Ship to:	
Name		Name	Grace Holder
Company	Greenheart Farms	Company	Great Basin Unified Air Pollution Control District
Address	902 Zenon Way	Address	190 Cerro Gordo
City/State/Zip	Arroyo Grande, CA 93420	City / State / Zip	Keeler, CA 93530
Phone	(805) 481-2234	Phone	(760) 872-8211
Acct. No.		Ship Via	
Reference		Terms	

Date Required: 10/15/20

Ordered by (if different than ship to) Grace Holder

Quantity	Units	Description	Unit Price	Tax	TOTAL
10,000	plants	Native shrubs – 2" by 10" container	\$2.54	Y	\$ 25,400.00
		The number of plants shall be approximately as follows:			\$ -
		ATPO = 2,500			\$ -
		ATPA = 2,500			\$ -
		SUMO = 2,500			\$ -
		SAVE = 2,500			\$ -
					\$ -
1		Freight/Delivery	\$2,120.58	N	\$ 2,120.58
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -
					\$ -

Approval Required:	Governing Board	Taxable SubTotal	\$ 25,400.00
		NonTaxable SubTotal	\$ 2,120.58
		Shipping & Handling	
		Taxes: Rate: 7.75%	\$ 1,968.50
		TOTAL	\$ 29,489.08
Signature _____ Date _____			

Payment Method:																																	
Notes:	<table> <tr> <th>Budget</th> <th>Category</th> <th>%</th> <th>\$</th> </tr> <tr> <td>Keeler Dunes</td> <td></td> <td>100%</td> <td>\$ 29,489.08</td> </tr> <tr> <td>General Fund</td> <td></td> <td></td> <td>\$ -</td> </tr> <tr> <td>General Fund</td> <td></td> <td></td> <td>\$ -</td> </tr> <tr> <td>General Fund</td> <td></td> <td></td> <td>\$ -</td> </tr> <tr> <td>General Fund</td> <td></td> <td></td> <td>\$ -</td> </tr> <tr> <td>General Fund</td> <td></td> <td></td> <td>\$ -</td> </tr> <tr> <td colspan="3">Total 100%</td> <td>\$ 29,489.08</td> </tr> </table>	Budget	Category	%	\$	Keeler Dunes		100%	\$ 29,489.08	General Fund			\$ -	General Fund			\$ -	General Fund			\$ -	General Fund			\$ -	General Fund			\$ -	Total 100%			\$ 29,489.08
	Budget	Category	%	\$																													
	Keeler Dunes		100%	\$ 29,489.08																													
	General Fund			\$ -																													
	General Fund			\$ -																													
	General Fund			\$ -																													
	General Fund			\$ -																													
General Fund			\$ -																														
Total 100%			\$ 29,489.08																														



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537
Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Susan Cash, Administrative Projects Manager

Subject: Approval of Draft Update to District Unification Agreement

Summary:

Staff advised your Board at the July 18, 2019 meeting that the District's Unification Agreement needed to be updated. Specifically, staff requested direction regarding: addition of alternate positions for Inyo County, Mono County, and the Town of Mammoth Lakes; rescission of Rule 1102 and incorporation into an updated Unification Agreement; and clarification of the requirement for an affirmative vote.

Staff returned to your Board at the November 17, 2019 meeting with the changes as directed, and the Board directed staff to take the updated bylaws to the member agencies' governing boards for approval. As staff moved through that process, other items of concern were noted by member agencies' counsels, and additional changes were recommended. All three county counsels have seen the new recommended "Amended and Restated...Unification Agreement" and have had the opportunity for input. As the changes overall are extensive (but not necessarily substantive), we have brought this draft back to your Board for any final comments or changes before submission to the County Boards for approval.

In addition to the original direction given by the Governing Board to staff for the update, counsels have recommended cleaning up and updating of the legal language in the agreement. Counsels also determined that the Town of Mammoth Lakes should not be added as a signatory, as the Counties are the entities that form air districts and thus can consolidate them, not municipalities.

If the board approves these amendments, the draft agreement will be sent to the three member county Boards of Supervisors for their agreement. When and if those boards agree, the final agreement will return to your Board for action.

Fiscal Impact:

There is no fiscal impact associated with this discussion or direction, other than already-budgeted staff time to implement the direction.

Board Action:

Approve draft changes to the Unification Agreement and direct staff to proceed with the next steps.

Attachments:

1. 1982 Unification Agreement
2. 1994 Rule 1102
3. Redline copy of draft updated unification agreement
4. Clean copy of draft updated unification agreement

AGREEMENT

THIS AGREEMENT made and entered into by and between the Board of Supervisors of the County of Inyo, the Board of Supervisors of the County of Mono, the Board of Supervisors of the County of Alpine and exofficio the Air Pollution Control Board of the Inyo County Air Pollution Control District, the Air Pollution Control Board of the Mono County Air Pollution Control District, and the Air Pollution Control Board of the Alpine County Air Pollution Control District.

WITNESSETH:

WHEREAS, the County of Inyo, the County of Mono and the County of Alpine have heretofore each activated an air pollution control district pursuant to the provisions of Chapter 2 of Division 20 of the Health and Safety Code, and

WHEREAS, said members have met and so agreed;

NOW, THEREFORE, IT IS MUTUALLY AGREED AS FOLLOWS:

1. That the Inyo County Air Pollution Control District, the Mono County Air Pollution Control District, and the Alpine County Air Pollution Control District be and the same are hereby merged into one district pursuant to the provisions of Article 7, Chapter 2, Division 20 of the Health and Safety Code.
2. That said district shall be known and designated as the Great Basin Unified Air Pollution Control District.
3. That the relative population of the counties within said district at the date hereof is as follows:

Inyo County	64.2 percent
Mono County	31.7 percent
Alpine County	4.1 percent

4. That the composition of the Air Pollution Control Board shall be as follows:
 - (a) Two members of the Board of Supervisors of Inyo County selected by said Board of Supervisors.
 - (b) Two members of the Board of Supervisors of Mono County selected by said Board of Supervisors.
 - (c) Two members of the Board of Supervisors of Alpine County selected by said Board of Supervisors.
5. That the voting procedure of the Air Pollution Control Board shall be as follows:
 - (a) Each member shall have one vote.
 - (b) Quorum: A quorum of said Air Pollution Control Board shall consist of four members, provided, however, no action affecting only a particular zone may be taken without a representative of that zone being present and voting on the action.
 - (c) Alternate members: The Board of Supervisors of Alpine County shall designate an alternate member who shall serve in the event the designated member is absent or unable to attend a meeting.
 - (d) All acts of the Air Pollution Control Board shall require the affirmative vote from each of two counties.
6. That the Air Pollution Control Board of the unified district hereby created shall appoint a Hearing Board as provided by law, with the additional provision that at least one member of said Board shall be from each county.
7. That employees of the said unified district, pending the adoptions by the Air Pollution Control Board of the unified district of personnel policies and procedures, shall be subject to and granted the right conferred, by the Personnel Ordinance of the County of Inyo.

8. That a fifteen (15) member Advisory Committee may be appointed by the Air Pollution Control Board from a list provided by the Board of Supervisors of each county, with five (5) members from each county appointed to serve on said Advisory Committee.
9. That the Treasurer for the County of Inyo shall serve as Treasurer for the unified district hereby created.
10. That any employee of the three counties who transfers to the service of the unified district shall retain all sick leave, vacation, retirement and other benefits accrued by reason of his county employment.
11. Modification or termination:
 - (a) Modification. This agreement, except as to the counties constituting the unified district hereby created, may be modified on the recommendation of the Air Pollution Control Board and concurred in by the Board of Supervisors of each county within the unified district hereby created.
 - (b) Withdrawal of any county. Any county, a party hereto, may withdraw from the unified district hereby created upon thirty (30) days notice in writing, one to the others; provided, however, such notification shall be made not less than ninety (90) days prior to the end of any fiscal year. Upon the withdrawal of any county from the Unified District said Unified District shall terminate, and the duties and powers of said Unified District shall revert to its respective member county districts.
 - (c) Termination. This agreement may be terminated at any time upon the recommendation of the Air Pollution Control Board and concurred in by the Board of Supervisors of each county within the unified district herein created. Upon termination of the Unified District, the duties and powers of said Unified District shall revert to its respective member county districts.
12. That the funds, property and liabilities of the Inyo, Mono and Alpine County Air Pollution Control Districts shall, upon the merging of said three districts, become the funds, property and liabilities of the unified air pollution control district hereby created. Upon termination or withdrawal of the Unified District, any assets or liabilities then or thereafter accruing to it shall revert to its member counties in proportion as the same are set forth in Section 3 of this agreement.

13. That this Agreement shall become effective and operative, insofar as the merger of said Inyo County Air Pollution Control District, said Mono County Air Pollution Control District and said Alpine County Air Pollution Control District is concerned, on March 1, 1974.

IN WITNESS WHEREOF the parties hereto have executed this Agreement the day and year set opposite the signature of their respective officers.

ATTEST:

BOARD OF SUPERVISORS OF THE
COUNTY OF ALPINE

Joan Y. Chacón
Clerk of the Board

Date: August 3, 1982

By Walter N. Nield
Chairman

BOARD OF SUPERVISORS OF THE
COUNTY OF INYO

Kelli Herman
Clerk of the Board

Date: 4/29/82

By Wilma B. Muth
Chairman

BOARD OF SUPERVISORS OF THE
COUNTY OF MONG

Marivic E. Peigné
Clerk of the Board

Date: July 19, 1982

By Ed Mauer
Chairman

REGULATION XI - ADMINISTRATIVE POLICIES AND PROCEDURES

RULE 1102. Governing Board Membership, Funding and Voting Procedures

A. Governing Board Membership

The District Governing Board shall be made up of seven members. The Inyo County Board of Supervisors shall, from time to time as necessary, select two of its members to serve as members of the District Governing Board. The Mono County Board of Supervisors shall, from time to time as necessary, select two of its members to serve on the District Governing Board. The Alpine Board of Supervisors shall, from time to time as necessary, select two of its members to serve on the District Governing Board. The Mammoth City Council shall, from time to time as necessary, select one of its members to serve on the District Governing Board.

B. Funding

The District shall be funded by the counties and cities who have representatives on the District Governing Board, by making the following annual payments to the District:

1. Inyo County: \$0.55 per capita of population within the County boundaries;
2. Alpine County: \$0.55 per capita of population within the County boundaries;
3. Mono County: \$0.55 per capita of population within the unincorporated area of the county;
4. City of Mammoth: \$0.55 per capita of population within the incorporated city.

C. Voting Procedures

A quorum of the District Governing Board shall be four; actions requiring 4/5ths vote of the Governing Board shall require 6 (six) votes.

D. Modification of Agreement

Upon ratification by the Inyo County, Mono County and Alpine

County Boards of Supervisors and the Mammoth City Council, this Rule shall constitute a modification to the Agreement between Inyo, Mono and Alpine Counties forming the Great Basin Unified Air Pollution Control District.

E. Effective Date

This Rule shall become effective on June 30, 1994.

Ellen Hardebeck
Control Officer



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short St. Suite #6 - Bishop, CA 93514
(619) 872-8211

June 29, 1994

I HEREBY CERTIFY that at a meeting of the Great Basin Unified Air Pollution Control District in the Alpine County Board of Supervisors Chambers in the town of Markleeville, California on June 29, 1994, an order was duly made and entered as follows:

ADOPTION OF RULE 1102

(GOVERNING BOARD MEMBERSHIP, FUNDING AND VOTING PROCEDURES)

A motion was made by Supervisor Lawrence, seconded by Supervisor Jarvis adopting Rule 1102. Governing Board Membership, Funding and Voting Procedures. Motion carried unanimously and so ordered.

WITNESS: B/O #062994-12

ATTEST:

Donna Leavitt
Donna Leavitt, Clerk of the Board

AMENDED AND RESTATED GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT
UNIFICATION AGREEMENT

THIS AGREEMENT made and entered into by and between the Board of Supervisors of the County of Inyo, the Board of Supervisors of the County of Mono, the Board of Supervisors of the County of Alpine, and ex-officio the Air Pollution Control Board of the Inyo County Air Pollution Control District, the Air Pollution Control Board of the Mono County Air Pollution Control District, and the Air Pollution Control Board of the Alpine County Air Pollution Control District.

WITNESSETH:

WHEREAS, the County of Inyo, the County of Mono and the County of Alpine ("Counties") have heretofore each activated an air pollution control district pursuant to the provisions of ~~Chapter 2 of Division 20~~Part 3 of Division 26 of the Health and Safety Code (the "Applicable Law"); and

WHEREAS, effective March 1, 1974, the Counties entered into an agreement pursuant to the Applicable Law to create a unified air pollution control district, designated the Great Basin Unified Air Pollution Control District; and

WHEREAS, the Counties now wish to amend the 1974 agreement to update its provisions consistent with the Applicable Law; and

WHEREAS, ~~said member~~the Counties have met and so agreed;

NOW, THEREFORE, IT IS MUTUALLY AGREED AS FOLLOWS:

1. That the Inyo County Air Pollution Control District, the Mono County Air Pollution Control District, and the Alpine County Air Pollution Control District shall continue to serve as one unified district pursuant to the provisions of Health and Safety Code Section 40150.6e and the same are hereby merged into one district pursuant to the provisions of Article 7, Chapter 2, Division 20 of the Health and Safety Code.
2. That said district shall continue to be known and designated as the Great Basin Unified Air Pollution Control District ("District").
3. That the ~~relative~~ population of the Ceounties and cities within said district as of 2017~~at the date hereof~~ is as follows:

Inyo County ————— 64.2 percent
Mono County ————— 31.7 percent
Alpine County ————— 4.1 percent

	<u>Population</u>	<u>% of Total Pop.</u>
<u>Inyo County (total)</u>	<u>18,026</u>	<u>54%</u>
<u> Inyo County (unincorporated only)</u>	<u>14,072</u>	<u>42%</u>
<u> City of Bishop</u>	<u>3,954</u>	<u>12%</u>
<u>Mono County (total)</u>	<u>14,186</u>	<u>43%</u>
<u> Mono County (unincorporated only)</u>	<u>6,184</u>	<u>19%</u>

<u>Town of Mammoth Lakes</u>	<u>8,002</u>	<u>24%</u>
<u>Alpine County (total)</u>	<u>1,120</u>	<u>3%</u>
<u>TOTAL</u>	<u>33,332</u>	

4. That the District is governed by a 7-member composition of the Air Pollution Control Board, ~~shall be comprised~~ as follows:
- (a) Two members of the Board of Supervisors of Inyo County selected by said Board of Supervisors.
 - (b) Two members of the Board of Supervisors of Mono County selected by said Board of Supervisors.
 - (c) Two Members of the Board of Supervisors of Alpine County selected by said Board of Supervisors.
 - (d) One Member of the Town Council of the Town of Mammoth Lakes selected by said Town Council.
5. Each member agency shall also select a member of their respective boards to serve as an alternate member who may serve in the event their designated member is absent or unable to attend. That the voting procedure of the Air Pollution Control Board shall be as follows:
- (a) Each member shall have one vote.
 - (b) Quorum: A quorum of said Air Pollution Control Board shall consist of four members, provided, however, no action affecting only a particular zone designated pursuant to Health and Safety Code 40156 may be taken without a representative of that zone being present and voting on the action.
 - ~~((c) Alternate members: The Board of Supervisors of Alpine County shall designate an alternate member who shall serve in the event the designate member is absent or unable to attend a meeting.~~
 - ~~((d) Actions requiring a majority vote of the Governing Board shall require 4 votes. All acts of the Air Pollution Control Board shall require the affirmative vote from each of two counties. Actions requiring 4/5ths vote of the Governing Board shall require 6 votes.~~
6. The District shall be funded by the Counties and cities who have representatives on the District Governing Board, by making the following annual payments to the District:
- a. Inyo County: \$0.55 per capita of population within county boundaries;
 - b. Alpine County: \$0.55 per capital of population within county boundaries;
 - c. Mono County: \$0.55 per capita of population within the unincorporated area of the county;
 - d. Town of Mammoth Lakes: \$0.55 per capita of population within the incorporated city.
- ~~6.7.~~ That the Air Pollution Control Board of the ~~unified~~ District ~~hereby created~~ shall appoint a Hearing Board as provided by law, with the additional provision that at least one member of said Board shall be from each county.

~~7. That employees of the said unified district, pending the adoption by the Air Pollution Control Board of the unified district of personnel policies and procedures, shall be subject to and granted the rights conferred, by the Personnel Ordinance of the County of Inyo.~~

8. That a fifteen (15) member Advisory Committee may be appointed by the Air Pollution Control Board from a list provided by the Board of Supervisors of each county, with five (5) members from each county appointed to serve on said Advisory Committee.

9. That the Treasurer for the County of Inyo shall serve as Treasurer for the ~~unified d~~District ~~hereby created~~.

9. _____

~~10. That any employee of the three counties who transfers to the service of the unified district shall retain all sick leave, vacation, retirement, and other benefits accrued by reason of his county employment.~~

~~11.10.~~ _____ Modification or termination:

(a) Modification. This agreement, ~~except as to the counties constituting the unified district hereby created,~~ may be modified on the recommendation of the Air Pollution Control Board and concurred in by the Board of Supervisors of each county within ~~the unified dDistrict; provided, however, that any issues related to the counties and/or cities that constitute the District must be handled pursuant to the procedures set forth in section 10(b) below. hereby created.~~

(b) Withdrawal of any County. Any county ~~that is a party, a party~~ hereto, may withdraw from the ~~unified dDistrict hereby created~~ upon thirty (30) days' notice in writing, one to the others; provided, however, such notification shall be made not less than ninety (90) days prior to the end of any fiscal year. Upon the withdrawal of any County from the ~~Unified-District, the said Unified~~ District shall terminate, and the duties and powers of ~~thesaid Unified~~ District shall revert to its respective member Counties' air pollution control~~county~~ districts.

(c) Termination. This agreement may be terminated at any time upon the recommendation of the Air Pollution Control Board and concurred in by the Board of Supervisors of each county within the ~~unified dDistrict herein created.~~ Upon termination of the ~~Unified~~ District, the duties and powers of ~~thesaid Unified~~ District shall revert to its respective member ~~county~~ Counties' air pollution control districts.

~~12.11.~~ _____ That the funds, property, and liabilities of the Inyo, Mono and Alpine County Air Pollution Control Districts shall, upon the merging of said three districts, become the funds, property and liabilities of the unified air pollution control district hereby created. ~~Upon That~~ upon termination or withdrawal of a member County~~the Unified from the~~ District, any assets or liabilities then or thereafter accruing to it shall revert to its member Counties in proportion as the same are set forth in Section 3 of this agreement.

~~13.12.~~ _____ That this agreement shall become effective and operative, ~~insofar as the merger of said Inyo County Air Pollution Control District, said Mono County Air Pollution Control District and said Alpine County Air Pollution Control District is concerned, on March 1, 1974~~ upon approval of the Great Basin Unified Air Pollution Control District Governing Board.

IN WITNESS WHEREOF the parties hereto have executed this Agreement the day and year set opposite the signature of their respective officers.

ATTEST:

BOARD OF SUPERVISORS OF THE
COUNTY OF ALPINE

Clerk of the Board
Date: _____

By _____
~~Chairman~~Chairperson

BOARD OF SUPERVISORS OF THE
COUNTY OF INYO

Clerk of the Board
Date: _____

By _____
~~Chairman~~Chairperson

BOARD OF SUPERVISORS OF THE
COUNTY OF MONO

Clerk of the Board
Date: _____

By _____
~~Chairman~~Chairperson

AMENDED AND RESTATED GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT
UNIFICATION AGREEMENT

THIS AGREEMENT made and entered into by and between the Board of Supervisors of the County of Inyo, the Board of Supervisors of the County of Mono, the Board of Supervisors of the County of Alpine, and ex-officio the Air Pollution Control Board of the Inyo County Air Pollution Control District, the Air Pollution Control Board of the Mono County Air Pollution Control District, and the Air Pollution Control Board of the Alpine County Air Pollution Control District.

WITNESSETH:

WHEREAS, the County of Inyo, the County of Mono and the County of Alpine ("Counties") have heretofore each activated an air pollution control district pursuant to the provisions of Part 3 of Division 26 of the Health and Safety Code (the "Applicable Law"); and

WHEREAS, effective March 1, 1974, the Counties entered into an agreement pursuant to the Applicable Law to create a unified air pollution control district, designated the Great Basin Unified Air Pollution Control District; and

WHEREAS, the Counties now wish to amend the 1974 agreement to update its provisions consistent with the Applicable Law; and

WHEREAS, the Counties have met and so agreed;

NOW, THEREFORE, IT IS MUTUALLY AGREED AS FOLLOWS:

1. That the Inyo County Air Pollution Control District, the Mono County Air Pollution Control District, and the Alpine County Air Pollution Control District shall continue to serve as one unified district pursuant to the provisions of Health and Safety Code Section 40150.
2. That said district shall continue to be known and designated as the Great Basin Unified Air Pollution Control District ("District").
3. That the population of the Counties and cities within said district as of 2017 is as follows:

	Population	% of Total Pop.
Inyo County (total)	18,026	54%
Inyo County (unincorporated only)	14,072	42%
City of Bishop	3,954	12%
Mono County (total)	14,186	43%
Mono County (unincorporated only)	6,184	19%
Town of Mammoth Lakes	8,002	24%
Alpine County (total)	1,120	3%
TOTAL	33,332	

4. That the District is governed by a 7-member Air Pollution Control Board, comprised as follows:
 - (a) Two members of the Board of Supervisors of Inyo County selected by said Board of Supervisors.
 - (b) Two members of the Board of Supervisors of Mono County selected by said Board of Supervisors.
 - (c) Two Members of the Board of Supervisors of Alpine County selected by said Board of Supervisors.
 - (d) One Member of the Town Council of the Town of Mammoth Lakes selected by said Town Council.
5. Each member agency shall also select a member of their respective boards to serve as an alternate member who may serve in the event their designated member is absent or unable to attend. That the voting procedure of the Air Pollution Control Board shall be as follows:
 - (a) Each member shall have one vote.
 - (b) Quorum: A quorum of said Air Pollution Control Board shall consist of four members, provided, however, no action affecting only a particular zone designated pursuant to Health and Safety Code 40156 may be taken without a representative of that zone being present and voting on the action.
 - (c) Actions requiring a majority vote of the Governing Board shall require 4 votes. Actions requiring 4/5ths vote of the Governing Board shall require 6 votes.
6. The District shall be funded by the Counties and cities who have representatives on the District Governing Board, by making the following annual payments to the District:
 - a. Inyo County: \$0.55 per capita of population within county boundaries;
 - b. Alpine County: \$0.55 per capital of population within county boundaries;
 - c. Mono County: \$0.55 per capita of population within the unincorporated area of the county;
 - d. Town of Mammoth Lakes: \$0.55 per capita of population within the incorporated city.
7. That the Air Pollution Control Board of the District shall appoint a Hearing Board as provided by law, with the additional provision that at least one member of said Board shall be from each county.
8. That a fifteen (15) member Advisory Committee may be appointed by the Air Pollution Control Board from a list provided by the Board of Supervisors of each county, with five (5) members from each county appointed to serve on said Advisory Committee.
9. That the Treasurer for the County of Inyo shall serve as Treasurer for the District.

10. Modification or termination:

(a) Modification. This agreement may be modified on the recommendation of the Air Pollution Control Board and concurred in by the Board of Supervisors of each county within District; provided, however, that any issues related to the counties and/or cities that constitute the District must be handled pursuant to the procedures set forth in section 10(b) below.

(b) Withdrawal of any County. Any county that is a party hereto may withdraw from the District upon thirty (30) days' notice in writing, one to the others; provided, however, such notification shall be made not less than ninety (90) days prior to the end of any fiscal year. Upon the withdrawal of any County from the District, the District shall terminate, and the duties and powers of the District shall revert to its respective member Counties' air pollution control districts.

(c) Termination. This agreement may be terminated at any time upon the recommendation of the Air Pollution Control Board and concurred in by the Board of Supervisors of each county within the District. Upon termination of the District, the duties and powers of the District shall revert to its respective member Counties' air pollution control districts.

11. That upon termination or withdrawal of a member County from the District, any assets or liabilities then or thereafter accruing to it shall revert to its member Counties in proportion as the same are set forth in Section 3 of this agreement.

12. That this agreement shall become effective and operative upon approval of the Great Basin Unified Air Pollution Control District Governing Board.

IN WITNESS WHEREOF the parties hereto have executed this Agreement the day and year set opposite the signature of their respective officers.

ATTEST:

BOARD OF SUPERVISORS OF THE
COUNTY OF ALPINE

Clerk of the Board

Date: _____

By _____

Chairperson

BOARD OF SUPERVISORS OF THE
COUNTY OF INYO

Clerk of the Board

Date: _____

By _____

Chairperson

BOARD OF SUPERVISORS OF THE
COUNTY OF MONO

Clerk of the Board

Date: _____

By _____

Chairperson



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537
Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Patricia Gilpin, Fiscal Services Technician

Subject: FY 2019-2020 2nd Quarter Financial Reports (Oct. 1 – Dec. 31)

Summary:

Financial summaries for the 2nd quarter of the 2019-20 Fiscal Year are attached. The District operates two main budgets, the “General Fund” (formerly “District”) and the “SB 270”.

The General Fund Budget’s income and expenses are traditional air pollution control activities within the tri-county boundaries, with exception of any air pollution control income and expenses related to the City of Los Angeles’ water-diversion activities. The General Fund also has three sub-budgets: The Owens Lake Trust Fund, the Clean Air Projects Program, and the Keeler Dunes Dust Control Project. Reports on these budgets are also included in this summary. Funds for these three sub-budgets are also held in the Inyo County Treasury.

The SB 270 Budget’s income and expenses are related to the City of Los Angeles activities at Owens and Mono Lakes. Funds for all budgets are held in the Inyo County Treasury.

The District received \$100,168.07 for Woodstove Reduction Program, all the funds have been encumbered.

Fiscal Impact:

None

Board Action:

None. Information only.

Attachments:

1. FY 2019-20 2nd Quarter Financial Reports (October 1 – December 31)

Great Basin Unified Air Pollution Control District
General Fund (formerly "District") FY 2019-2020
For the 2nd Quarter (Ending December 31, 2019)

EXPENSES		2nd Quarter	Budget	Adjusted Budget	% of Budget
I	Employee Costs				
A	Employee Wages	179,485.33	347,500.00	367,404.00	48.85%
B	Retirement	92,498.83	71,000.00	74,261.00	124.56%
C	Insurance Benefits	33,851.94	67,500.00	63,908.00	52.97%
D	Taxes	33,200.16	62,000.00	65,423.00	50.75%
E	Worker's Compensation Insurance	2,407.08	3,500.00	3,500.00	68.77%
	Employee Costs	341,443.34	551,500.00	574,496.00	59.43%
II	Operating & Compliance Costs				
A	Advertising - Legal Notices & Ads	1,892.59	3,000.00	3,000.00	63.09%
B	Dues, Subscriptions Education, Use Tax, Fees, AB2588	5,856.84	12,000.00	12,000.00	48.81%
C	Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea.)	8,741.08	23,500.00	23,500.00	37.20%
D	Fuel and Gasoline	1,449.87	4,000.00	4,000.00	36.25%
E	Health & Safety	-	1,000.00	1,000.00	-
F	Insurance - Liability, Fire & Casualty	11,180.86	10,500.00	10,500.00	106.48%
G	Leases & Rents: Equipment, Office, Site, Storage	4,838.24	9,000.00	9,000.00	53.76%
H	Maintenance & Repairs of Equipment - Labor	2,329.96	14,500.00	14,500.00	16.07%
I	Maintenance & Repairs of Equipment - Materials	361.46	13,000.00	13,000.00	2.78%
J	Postage and Shipping	48.55	1,000.00	1,000.00	4.86%
K	Professional & Special Services	4,011.66	21,000.00	21,000.00	19.10%
L	Supplies & Tools (In-Field, Office, General Use)	636.52	2,500.00	2,500.00	25.46%
M	Transportation & Travel	1,376.44	10,000.00	10,000.00	13.76%
N	Utilities	5,428.58	10,500.00	10,500.00	51.70%
O	Public Assistance/Grant Programs	-	6,000.00	6,000.00	-
	Operating & Compliance Costs	48,152.65	141,500.00	141,500.00	34.03%
III	Capital Outlay				
A	Equipment: Computer, Furniture, General, Office, Scientific, Software (>\$5,000 ea.)	-	57,000.00	57,000.00	-
B	FY18-19 Carry overs	19,280.64	-	19,228.01	100.27%
C	Capital Expenditure Fund: Vehicles & Equipment	-	45,000.00	45,000.00	-
D	Building and Land (From Reserve, not in 18/19 total)	-	-	14,836.15	-
E	Building Improvements	743.12	15,000.00	15,000.00	4.95%
	Capital Outlay Costs	20,023.76	117,000.00	151,064.16	17.11%
	FY 2019-20 TOTAL GENERAL FUND EXPENSES	409,619.75	810,000.00	867,060.16	47.24%
	PASSTHROUGH FUNDS				
A	EPA 105 Grant (Restricted)	9,423.12	71,889.00	71,889.00	13.11%
B	EPA PM2.5 Grant (Restricted)	193.91	18,245.00	18,245.00	1.06%
C	AB 197	-	8,500.00	8,500.00	-
D	AB 617	294.89	36,994.00	36,994.00	0.80%
E	Woodsmoke Reduction	-	100,000.00	100,000.00	-
		9,911.92	235,628.00	235,628.00	4.21%
	FY 2019-20 TOTAL GENERAL FUND EXPENSES w/Grants	\$ 419,531.67	\$ 1,045,628.00	\$ 1,102,688.16	38.05%

Great Basin Unified Air Pollution Control District
General Fund (formerly "District") Budget FY 2019-2020
For the 2nd Quarter (Ending December 31, 2019)

REVENUE		2nd Quarter	Budget	Adjusted Budget	% of Budget
I	Fees, Permits & Penalties				
A	AB 2588 - Toxic Hot Spots	-	4,000.00	4,000.00	-
B	Conservation Mgmt. Plan/Prescribed Burn Plan	257.00	5,000.00	5,000.00	5.14%
C	Geothermal	12,158.00	310,000.00	310,000.00	0.04
D	Hearing Board	-	-	-	-
E	Initial Permit Fees (FF, ATC, Mods)	4,088.00	30,000.00	30,000.00	13.63%
D	Penalties & Late Fees	1,893.00	12,000.00	12,000.00	15.78%
G	Sources (Asbestos, Diesel, Fuel, Electric, PERP)	41,461.00	128,500.00	128,500.00	32.27%
H	Service Station Vapor Recovery	6,807.00	15,000.00	15,000.00	45.38%
	Fees, Permits & Penalties	66,664.00	504,500.00	504,500.00	13.21%
II	Other Revenue				
A	Air Monitoring Audits	-	-	-	-
B	Interest	15,425.26	20,000.00	20,000.00	0.77
C	Per Capita Fee	-	-	-	-
D	Sales, Services, Fees, Rebates & Refunds	204.27	5,000.00	5,000.00	4.09%
E	State Subvention (3 counties)	133,560.07	138,500.00	138,500.00	0.96
F	Town of Mammoth Lakes (Air Monitoring)	25,000.00	25,000.00	25,000.00	1.00
G	From Reserves	-	117,000.00	117,000.00	-
H	From General Fund Reserve, Employee Wages (BO#190905-03c)	22,996.00	-	22,996.00	1.00
I	FY18-19 Carry over	19,228.01	-	19,228.01	100.00%
J	Building and Land (From Reserve, not in 18/19 total)	14,836.15	-	14,836.15	100.00%
	Other Revenue	231,249.76	305,500.00	362,560.16	63.78%
	FY 2019-20 TOTAL GENERAL FUND REVENUE	297,913.76	810,000.00	867,060.16	34.36%
III	PASSTHROUGH FUNDS				
A	EPA 105 Grant (Restricted)	-	71,889.00	71,889.00	-
B	EPA PM2.5 Grant (Restricted)	51,100.00	18,245.00	18,245.00	280.08%
C	AB 197	-	8,500.00	8,500.00	-
D	AB 617	-	36,994.00	36,994.00	-
E	Woodsmoke Reduction	-	100,000.00	100,000.00	-
	Total Grants	51,100.00	235,628.00	235,628.00	21.69%
	FY 2019-20 TOTAL GENERAL FUND REVENUE w/Grants	\$ 349,013.76	\$ 1,045,628.00	\$ 1,102,688.16	31.65%

Reconcile to Inyo County Treasury as of 12/31/2019

General Fund Reserves	\$ 3,339,581.58
Capital Asset Accrual Reserves	\$ 110,051.79
Spendable/Available Cash	\$ 17,305.12
CEQA Lead Agency Litigation Funds ⁽¹⁾	\$ 29,442.42
103 Grant Funds (PM2.5)	\$ 60,068.55
105 Grant Funds	\$ 16,213.43
	\$ 3,572,662.89

Balance, IC Auditor Report 12/31/2019

\$ 3,572,662.89

Checking account balance as of 12/31/2019=(\$8,503.62)

¹ ORMAT Litigation Funds

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2019-2020
For the 2nd Quarter (Ending December 31, 2019)

EXPENSES		2nd Quarter	Budget	Adjusted Budget	% of Budget
I	Employee Costs				
A	Employee Wages	813,593.12	1,740,000.00	1,835,360.00	44.33%
B	Retirement	466,164.95	490,000.00	503,885.00	92.51%
C	Insurance Benefits	221,355.46	480,000.00	460,566.00	48.06%
D	Taxes	152,114.50	310,000.00	326,577.00	46.58%
E	Worker's Compensation Insurance	13,640.10	16,000.00	16,000.00	85.25%
	Employee Costs	1,666,868.13	3,036,000.00	3,142,388.00	53.04%
II	Operating & Compliance				
A	Advertising - Legal Notices & Ads	1,025.10	1,500.00	1,500.00	68.34%
B	Dues, Subscriptions, Education, Use Tax & Fees	18,778.96	64,000.00	64,000.00	29.34%
C	Equipment: Computer, Furniture, General, Office, Safety, Scientific, Software (<\$5,000 ea.)	42,007.45	146,500.00	146,500.00	28.67%
D	Fuel and Gasoline	13,211.28	30,000.00	30,000.00	44.04%
E	Health & Safety	-	5,000.00	5,000.00	-
F	Insurance - Liability, Fire & Casualty	63,181.04	58,000.00	58,000.00	108.93%
G	Leases & Rents: Equipment, Office, Site, Storage	18,070.51	33,000.00	33,000.00	54.76%
H	Maintenance & Repairs of Equipment - Labor	19,933.10	71,000.00	71,000.00	28.07%
I	Maintenance & Repairs of Equipment - Materials	43,215.83	251,000.00	251,000.00	17.22%
J	Postage and Shipping	361.80	2,000.00	2,000.00	18.09%
K	Professional & Special Services	356,255.53	1,340,000.00	1,365,000.00	26.10%
L	Supplies and Tools (In-field, Office, General Use)	8,080.53	27,500.00	27,500.00	29.38%
M	Transportation & Travel	5,877.08	29,500.00	29,500.00	19.92%
N	Utilities	40,735.32	80,000.00	80,000.00	50.92%
O	Control Measure Testing	-	200,000.00	200,000.00	-
P	Public Outreach & Education	-	10,000.00	10,000.00	-
Q	Contingency Expenditures	-	25,000.00	25,000.00	-
	Operating & Compliance Costs	630,733.53	2,374,000.00	2,399,000.00	26.29%
III	Capital Outlay				
A	Equipment: Computer, Furniture, General, Office, Scientific, Software (>\$5,000 ea.)	203,911.94	325,000.00	422,716.39	48.24%
B	Vehicles & ATVs	-	45,000.00	45,000.00	-
C	Building and Land (From Reserve, not in 18/19 total)	-	-	84,071.52	-
D	Building Improvements	4,211.00	85,000.00	85,000.00	4.95%
	Capital Outlay Costs	208,122.94	455,000.00	636,787.91	32.68%
	Expenses Total (Parts I, II, III)	\$ 2,505,724.60	\$ 5,865,000.00	\$ 6,178,175.91	40.56%
IV	Owens Lake Scientific Advisory Panel				
A	2014 Stipulated Judgment (Paragraph 12.G)	\$ 220,757.20	\$ 200,781.00	\$ 690,700.26	31.96%
	SB 270 Total Fee Assessment (Parts I - IV)	\$ 2,726,481.80	\$ 6,065,781.00	\$ 6,868,876.17	39.69%

Great Basin Unified Air Pollution Control District
SB 270 Budget FY 2019-2020
For the 2nd Quarter (Ending December 31, 2019)

REVENUE		2nd Quarter	Budget	Adjusted Budget	% of Budget
I	Fees, Permits & Penalties	\$ 5,865,000.00	\$ 5,865,000.00	\$ 5,865,000.00	100.00%
	Owens Lake Scientific Advisory Panel	\$ 690,700.26	\$ 200,781.00	\$ 690,700.26	100.00%
	SB 270 Total Fee Assessment	\$ 6,555,700.26	\$ 6,065,781.00	\$ 6,555,700.26	100.00%
II	Other Revenue				
	FY18-19 Carry-overs	122,716.39	-	122,716.39	100.00%
	Building and Land (From Reserve FY 18/19)	84,071.52	-	84,071.52	100.00%
	From Reserves, Employee Wages (BO#190905-03c)	106,388.00	-	106,388.00	100.00%
	Interest	38,052.34	-	-	-
	Sales, Services, Rebates, Refunds	1,157.58	-	-	-
	Other Revenue	352,385.83	-	313,175.91	112.52%
FY 2019- 2020 TOTAL SB 270 REVENUE		\$ 6,908,086.09	\$ 6,065,781.00	\$ 6,868,876.17	100.57%

Reconcile to Inyo County Treasury as of 12/31/2019

SB 270 General Fund Reserves	\$ 2,447,698.51
Capital Asset Accrual Reserves	\$ 286,422.46
Spendable/Available Cash	\$ 4,142,305.21
	\$ 6,876,426.18

Balance, IC Auditor Report 12/31/2019 **\$ 6,876,426.18**

Checking account balance as of 12/31/2019=\$70,920.87

Great Basin Unified Air Pollution Control District
Owens Lake Trust Fund FY 2019-2020
For the 2nd Quarter (Ending December 31, 2019)

Beginning Cash Balance 7/1/2019	1,084,546.96
June 30, 2019 Interest-earned Inyo County	5,577.25
September 30, 2019 Interest-earned Inyo County	4,687.93
	<u>1,094,812.14</u>

Expenses

Professional Services	-
-----------------------	---

<i>Checking account balance</i>	<u>3.90</u>
	3.90

Reconcile to Inyo County Treasury 12/31/2019	<u><u>\$ 1,094,812.14</u></u>
--	-------------------------------

Balance: IC Auditors Report as of 12/31/2019	<u><u>\$ 1,094,812.14</u></u>
--	-------------------------------

Great Basin Unified Air Pollution Control District
Clean Air Projects Program FY 2019-2020
For the 2nd Quarter (Ending December 31, 2019)

February 7, 2019 Owens Lake Dust Mitigation Plan	2,575,335.10
June 30, 2019 Interest-earned Inyo County	13,250.74
September 30, 2019 Interest-earned Inyo County	11,131.85
	<u>2,599,717.69</u>

Expenses

Professional Services	-
-----------------------	---

<i>Checking account balance</i>	<u>-</u>
	-

Reconcile to Inyo County Treasury 12/31/2019	<u><u>\$ 2,599,717.69</u></u>
--	-------------------------------

Balance: IC Auditors Report as of 12/31/2019	<u><u>\$ 2,599,717.69</u></u>
--	-------------------------------

Great Basin Unified Air Pollution Control District
Keeler Dunes Dust Control Projects FY 2019-2020
For the 2nd Quarter (Ending December 31, 2019)

Beginning Cash Balance 7/1/2019	811,777.98
June 30, 2019 Interest-earned Inyo County	4,564.97
Checking account balance at year-end	14,486.75
September 30, 2019 Interest-earned Inyo County	<u>3,415.92</u>
	834,245.62

Expenses

Paid year-end invoices FY18-19 accruals	31,512.78
Employee Costs	34,528.65
General Expenses	15,491.43
Jimmy Myers payment	(20,000.00)
Projects	95,395.32
Administration	<u>454.37</u>
	157,382.55
 <i>Checking account balance</i>	 <u>1,632.85</u>
	159,015.40

Reconcile to Inyo County Treasury 12/31/2019	<u><u>\$ 675,230.22</u></u>
---	---------------------------------------

Balance: Inyo County Auditors as of 12/31/2019	<u><u>\$ 675,230.22</u></u>
---	---------------------------------------



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537
Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: Governing Board

From: Tori DeHaven, Clerk of the Board

Subject: Travel Report

Summary:

Jacklyn Bryan	1/12 – 1/14	Visible Emissions Evaluation Training	Sacramento, CA
Tom Schaniel	1/28 – 1/30	Visible Emissions Evaluation Training	San Dimas, CA
Jacklyn Bryan Tom Schaniel	2/10 – 2/12	Smoke Management Training	Diamond Bar, CA
Tom Schaniel Ann Logan	2/25 – 2/27	2020 Enforcement Case Development and Resolution	Sacramento, CA

Board Action:

None. Informational only.



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Tori DeHaven, Permit Coordinator/Board Clerk

Subject: Permit Enforcement Activity Report

The permit database is maintained by the Permit Coordinator. Information collected from the Air Quality Specialists, Air Pollution Control Officer, and Deputy Air Pollution Control Officer is entered upon receipt. The data and reports are discussed regularly in permit enforcement meetings. Data collected as of December 31, 2019, is as follows:

2nd Qtr. Permit Activity: October 1, 2018 – December 31, 2018

Permit Applications Received	5
Authority to Construct Issued	6
Temporary/Permits to Operate Issued	2
Permit Inspections	10
Notices of Violation Issued	1

2nd Qtr. Permit Activity: October 1, 2019 – December 31, 2019

Permit Applications Received	1
Authority to Construct Issued	4
Temporary/Permits to Operate Issued	5
Permit Inspections	12
Notices of Violation Issued	1

Open Notices of Violation

Inyo County	Mono County	Alpine County
4	1	0

Board Action:

None. Informational only.



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Susan Cash, Administrative Projects Manager

Subject: Final Report on 2018 Woodsmoke Reduction Program

Summary:

The District was awarded \$250,000 in 2018 for the implementation of the Woodsmoke Reduction Pilot Program, a part of California Air Resources Board's (CARB) California Climate Investments program putting cap-and-trade dollars to work reducing greenhouse gas emissions, strengthening the economy, and improving public health and the environment – particularly in disadvantaged communities. The majority of the District is considered disadvantaged by the metrics of this program.

Of the \$250,000, ten percent was designated for administration. Of the \$25,000 administration funds, \$1,250 was directed by CARB to the grant administrator, California Air Pollution Control Officers Association (CAPCOA), leaving \$23,750 for District administration expenses. The District used \$11,776 for administration and the remaining \$11,974 plus \$545 in interest was used for additional installations.

The District had \$225,000 plus the aforementioned unused administration money, for a total of \$237,519 for replacement of non-EPA-certified heating appliances with certified appliances.

The final installation numbers for the 2018 program are as follows:

Member Entity	Changeouts	\$
Inyo	54	\$182,937
Alpine	4	\$15,460
Mono	4	\$15,122
Mammoth Lakes	6	\$24,000
Total	68	\$237,519

Of the 68 vouchers used, 55 were for enhanced vouchers (up to \$4,000) for disadvantaged or low-income populations, and 13 were standard vouchers (up to \$2,000). Consumers utilizing the vouchers also contributed \$58,205 of their own funds for the installations, bringing the program total costs to \$295,724.

Fiscal Impact:

This program was paid for by a grant from CARB and supplemental funds from voucher recipients.

Board Action:

None. Information only.



GREAT BASIN UNIFIED AIR POLLUTION CONTROL DISTRICT

157 Short Street, Bishop, California 93514-3537

Tel: 760-872-8211 Fax: 760-872-6109

BOARD REPORT

Mtg. Date: March 5, 2020

To: District Governing Board

From: Phillip L. Kiddoo, Air Pollution Control Officer

Subject: Air Pollution Control Officer Report

A verbal report will be given at the meeting.