

Gary Lasky

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TO: California Air Resources Board

January 24, 2013

Rule 4103 (Open Burning) needs to be reviewed and tightened.

Exemptions and continued postponements of the open burning prohibitions for citrus orchard removal, grape vineyard removal, and operations of less than 20 acres should be removed.

For citrus orchard removal, there is no longer the excuse that biomass plants will turn away this material. Biomass plants will accept it. Besides, hundreds of trucks each day deliver biomass fuel to the Valley from 150 miles or more.

Vineyard material currently has all stakes and wire removed before burning because it is profitable to recycle this material. Clean grapevines are being burned today because the Air District continues to justify the practice based on false economic assumptions.

Open burning of prunings of almond wood from fields of 20 acres or less continues under the provably false justification that the set-up charge by custom shredding operators is prohibitive for small acreage — no longer true. Shredding businesses have proliferated and there is now little difference in the cost per acre to have 5 acres or 1000 acres shredded.

It is time to revisit this rule and enforce 100% of the prohibitions demanded by the California Health and Safety Code.

Finally, the smoke management system used to justify open burning needs to be better defined. There should be a strengthening of open burning rules along with any fireplace rule changes. This would be especially important for those seasons when open ag burning takes place and the fireplace rule is not applicable.

Regards,



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