



A Tradition of Stewardship
A Commitment to Service

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Gregory R. Clark
Agricultural Commissioner/Sealer

MEMORANDUM

To: Napa County Winegrape Industry	From: Greg Clark
Date: December 22, 2015	Re: Burning of Agricultural Waste

Now is the time of year when many vineyard operators and vineyard management companies choose to conduct burns to manage and dispose of agricultural pruning, attrition, and vineyard removals. Regulations surrounding such burns come under the regulatory authority of the Bay Area Air Quality Management District (BAAQMD). However, while burning is allowed provided certain requirements are met, there are alternatives.

While burning is a method of disposal as old as agriculture itself, I encourage you to consider other waste disposal methods. I am tasked with promoting and protecting agriculture, but I cannot adequately defend agricultural burns that are not done correctly. Smoke from improper burns not only adversely affects the air quality of the valley and region, but also give the agricultural industry a black eye as dark as some burns. It is not my intent to cast all agricultural burns as inappropriate or unnecessary. Rather, I ask you to seriously consider alternatives to burning, and if you are going to burn, that you follow the requirements outlined below to minimize smoke, particulate matter, and negative perceptions.

Alternate methods to manage pruning, attrition and vineyard removal include:

- Chipping/grinding plant material and disking into soil, or
- Chipping/grinding plant material for composting on-site or at a facility licensed to conduct composting, or
- Removing all waste material and transporting to a facility capable of handling it properly.

If growers choose to conduct agricultural burns, the following are the minimum BAAQMD requirements that must be met:

- All material must be *dried for 60 days* prior to burning, and
- Burn must take place only on a permissive burn day, and
- Cannot be ignited before 10:00 am, and

- No smoke shall be rising from the pile by sunset, and
- Pile size base area shall be limited to *no greater* than 25 yd² and pile height shall be *at least* 2/3 of the average width of the pile.

Growers must provide a completed notification [form](#) to BAAQMD and pay the required [fees](#). Crop replacement burns can be conducted from October through April, while pruning and attrition burns can be done November through April. Growers should also check with their local fire agency regarding the suitability of the burn. For crop replacement or pruning burns, growers do *not* need to contact the Agricultural Commissioner's Office. In certain instances outside of the normal burn periods, Ag Commissioner Staff may authorize a Disease and Pest burn.

For questions on open burning, go to BAAQMD's [Open Burn Status](#) page or call the District at (415) 749 4979.