

**PLACER COUNTY
AIR POLLUTION CONTROL DISTRICT**

PROPOSED RULE AMENDMENTS TO

**Rule 301, Non-Agricultural Burning Smoke Management,
Rule 302, Agricultural Waste Burning Smoke Management, and
Rule 305, Residential Allowable Burning**

STAFF REPORT

August 9, 2018

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Executive Summary

The purpose of the amendment of the Placer County Air Pollution District's ("District") Rule 301, Non-Agricultural Burning Smoke Management; Rule 302, Agricultural Waste Burning Smoke Management; and Rule 305, Residential Allowable Burning, is to allow the District to prohibit or restrict the open burning of waste from the growing or processing of cannabis. The open burning of commercially grown industrial hemp is excluded from the prohibitions of Rule 302, Agricultural Waste Burning Smoke Management, under which such burning would be required to meet the Rule's requirements for burning, including obtaining a District burn permit. Cannabis may be burned by a public officer with a District permit. The amendment of Rule 301 will allow some burning of cannabis vegetative waste for fire hazard reduction or for right-of-way, ditch, and levee clearing subject to conditions of a District permit. The limits on cannabis waste burning are intended to minimize or eliminate nuisance caused by smoke from the burning of cannabis waste. In addition, Rule 305 is amended to allow the use of burn barrels to burn dry paper or cardboard for a residence in an area that has been exempted from the State Airborne Toxics Control Measure for outdoor residential waste burning.

Discussion

Rule 301, Rule 302, and Rule 305, were last amended on February 9, 2012, when all six rules of Regulation 3, Open burning, were amended to address comments made by U.S. EPA and to make non-substantive changes. The six amended rules were forwarded to the California Air Resources Board and were subsequently approved by U.S. EPA as revisions to State Implementation Plan (SIP).

U.S. EPA in the Technical Support Document that accompanied the Federal Register Notice approving the six rules that were adopted by the District Board on February 9, 2012, as SIP revisions, made the following 3 recommendations:

- Rule 203, Exceptions to Rule 202, contains several references to prior open burning rules (e.g., Rules 315 and 320). For clarification of the allowed exemptions and enforceability, update these references in Rule 203 and resubmit this rule to the SIP.
- Remove the exemption for residential burning of vegetative waste from burn permit requirements and restrict residential burning activity to daytime hours (e.g., Monterey Bay Unified Air Pollution Control District Rule 438 and North Coast Unified Air Quality Management District Rules 200-208). The largest California air districts ban residential/backyard burning entirely (e.g., Bay Area Air Quality Management District Regulation 5, San Joaquin Valley Unified Air Pollution Control District Rule 4103, and South Coast Air Quality Management District Rule 444).
- We encourage the District to examine the feasibility of banning agricultural burning for specific crop types that have economically and technologically feasible alternatives to burning (e.g., San Joaquin Valley Unified Air Pollution Control District Rule 4103).

District Staff are not proposing to address the three recommendations at this time.

District Staff have proposed the following amendments, which are summarized below for each rule:

- Rule 301, Non-Agricultural Burning Smoke Management, which authorizes fire hazard reduction burning and burning for right-of-ways, and along ditches and levees, is amended to add a definition for Cannabis or Marijuana that includes both growing and processing. Industrial hemp is excluded from this definition. The amendments allow the open burning of waste from the growing or processing of cannabis, only with a District permit. Cannabis waste may be burned, if it is a fire hazard, by a public officer with a District permit.
- Rule 302, Agricultural Waste Burning Smoke Management, is amended to add a definition for Cannabis or Marijuana that includes both growing and processing. Industrial hemp is excluded from this definition. The amendments prohibit the open burning of waste from the growing or processing of cannabis, other than commercially grown industrial hemp. Industrial hemp waste may be burned, just as other crop waste may be burned, subject to the requirements of a District permit.
- Rule 305, Residential Allowable Burning, is amended to add a definition for Cannabis or Marijuana that includes both growing and processing. Industrial hemp is included in this definition, so that District Staff do not need to discriminate between industrial hemp and cannabis that is grown for consumption. The amendments prohibit the open burning of waste from the growing or processing of cannabis. In addition, Section 103.2 of Rule 305 is amended to allow burn barrels to be used for the burning of dry paper or cardboard. This amendment is made to match the exemption provisions of the State's Airborne Toxic Control Measure to Reduce Emissions of Toxic Air Contaminants from Outdoor Residential Waste Burning. The Iowa Hill sub-area of Placer County is the only Placer County community where dry paper and cardboard is currently allowed to be under a state approved exemption. If the exemption is extended, allowing burning in burn barrels is preferred over open pile burning because it presents a reduced fire hazard.

District Staff over the years have received complaints regarding the open burning for disposal of cannabis vegetative waste. Subsequent to the adoption of a Cannabis Ordinance by Placer County in November 2016, Placer County Code Enforcement officers advised the District of additional complaints arising from the burning of cannabis waste. It is anticipated that with the passage of state laws allowing the growing of cannabis for medical and recreational use that the open burning of cannabis waste for disposal will increase. Enforcing nuisance regulations for an otherwise legal burn is problematic and burdensome for enforcement staff and may not be deemed a public nuisance under District rules and state laws if only a few neighbors are impacted, even though the comfort and repose of neighbors may be severely affected. The District has

determined that the burning of cannabis waste produces unique odors which are different from other vegetative waste, and which many people consider offensive. Rather than be reactive to nuisance complaints that may be difficult resolve, the District may prohibit the burning of cannabis waste, particularly in residential settings, in the same manner as the open burning of poison oak and oleander green waste.

On January 23, 2018, a District hosted meeting was held to bring together interested staff from several County Departments including Building (Code Enforcement), the Sheriff's Office, the Agricultural Commissioner, Health & Human Services (Environmental Health), and Facilities (Environmental Utilities). Representatives from the Western Placer Waste Management Authority (WPWMA) also attended. Although there were no objections to the concept of a County-wide ban on cannabis waste burning, the following two concerns were expressed with regard to cannabis waste haulage to a solid waste disposal site (either a transfer station or a landfill):

- 1) Possession & Transport of Cannabis: Possession of more than 28.5 grams of cannabis is a crime under California law (Health & Safety Code Section 11357), and possession of any amount is illegal under federal Controlled Substances Act. These statutes remain intact although state commercial cannabis cultivation licensing regulation provides for self-hauling of cannabis waste to a manned and fully permitted solid waste facility; state law does not appear to provide a similar provision for non-commercially grown (i.e. cannabis grown for medical or recreational purposes by individuals for their own consumption). Presumably, cannabis waste will mainly consist of stems and leaves and not buds or flowers. Regardless, if the waste has flowers or buds, if it still green, it could be considered a cannabis product because the material can be used to make other products such as honey oil. Also, immature or diseased plants may also be disposed of as waste. Local law enforcement may have to make the discretionary determination that cannabis waste from residential growing is not subject to the statute if it is "rendered unrecognizable and unusable" which is a requirement for disposal of cannabis goods (16 CCR § 5054), including dried flower and products containing cannabis.
- 2) Disposal of Cannabis Waste as Solid Waste: California law considers cannabis waste to be a type of organic waste if it is not combined with any hazardous or toxic material. CalRecycle considers organic waste a type of solid waste, which a solid waste facility may handle and manage in accordance with to Title 14 and Title 27. Currently, although cannabis waste, under California law, may be collected as organic or solid waste, or self-hauled to a transfer station or landfill, such material remains a federally controlled substance. Placer County and the WPWMA are considering if and how acceptance of cannabis waste at these facilities could be accommodated.

Placer County residents and businesses outside city limits and west of Colfax (Franchise Areas 1 & 4) are provided with collection services by Recology Auburn Placer or may self-haul waste to a transfer station or a solid waste disposal facility. Waste in this service area goes to the Western Regional

Sanitary Landfill (WRSL) operated by the WPWMA. Wastes are classified and green waste is composted. Separate, weekly, residential green waste collection services are not provided to residents served by the Tahoe Truckee Sierra Disposal for Placer County regions east of Colfax and in the Tahoe area (Franchise Areas 2 & 3), although free green waste drop-off services at annual events and at the materials recovery facility are provided. Green waste is chipped for biomass fuel and non-recyclable waste is transported to a Nevada disposal site.

The state's emergency commercial cannabis cultivation licensing regulation allows on-site composting of cannabis vegetative waste, in addition to disposal at a permitted solid waste disposal site of cannabis waste that has been rendered unrecognizable and unusable. The California Bureau of Cannabis Control's regulations define "Cannabis Waste" as nonhazardous organic waste that contains cannabis and that has been made unusable and unrecognizable in the manner prescribed (16 CCR § 5000(d)). According to the regulation's Initial Statement of Reasons, cannabis could be rendered unusable by grinding and incorporating it with other ground materials (like food waste or yard waste to create a mixture of at least 50% non-cannabis waste), although specific methods are not prescribed in state regulation. This definition of "rendered unusable" was contained in the proposed Medical Cannabis Regulation that was superseded by the current Bureau of Cannabis Control's emergency regulations and is the definition used by other jurisdictions (e.g. the states of Washington, and Colorado). The composting alternative is also a possible option for some, but not all, residential growers of cannabis.

A prohibition on the burning of residential cannabis waste, where open burning is allowed, will potentially cause some increase in such waste being disposed in green or non-green waste totes, or being self-hauled to a solid waste disposal site. The Cities of Lincoln, Rocklin, and Roseville, where two-thirds of the County's population reside, already prohibit residential open burning and outdoor cannabis growing, so cannabis waste will potentially continue to be disposed of in the methods described above, or managed onsite. Note that Placer County has not yet developed a policy regarding the acceptance of cannabis waste at County solid waste facilities. Exhibit 1, Cannabis Ordinances & Open Burning Requirements, provides a summary table of the cannabis ordinances and open burning requirements for all jurisdictions in Placer County.

Rendering non-commercial cannabis waste unrecognizable and unusable before placing it in a tote or self-hauling may provide a pathway for "legal" transport of residentially grown cannabis wastes to a solid waste disposal site, particularly for self-hauling. However, the mulching or shredding of cannabis waste prior to disposal is not without issues, such as the availability of a mulcher or shredder to residents. Regardless, the District's mission to ensure that Placer County residents have healthful air and are not unduly impacted by odor or smoke nuisances, requires that the District prohibit the burning of cannabis waste from residential growing and processing.

A limited survey of other air pollution control and air quality management districts, indicates that that for non-commercial cannabis waste, some, such as El Dorado

County AQMD prohibit burning of cannabis waste, while others prohibit burning by not issuing burn permits (Mendocino) for such burning or rely upon local ordinances that prohibit such burning. Some air districts, especially the larger urban air districts such as South Coast AQMD and Bay Area AQMD, do not allow any residential open burning, and others have not yet developed a position regarding the residential burning of non-commercial cannabis waste.

Rendering non-commercial cannabis waste unrecognizable and unusable before placing it in a tote or self-hauling may provide a pathway for “legal” transport of residentially grown cannabis waste to a solid waste disposal site, particularly for self-hauling. However, the mulching or shredding of cannabis waste prior to disposal is not without issues, such as the availability of a mulching machine or shredder to residents.

Although these concerns regarding the transport of cannabis waste and the receipt of such waste by waste haulers and solid waste disposal facilities, because of existing state and federal statutes, that conflict with local ordinances allowing medical and recreational cannabis to be grown non-commercially, are valid, the resolving of the conflicts are not within the authority of the District. However, the District’s mission to ensure that Placer County residents have healthful air, and are not unduly impacted by odor or smoke nuisances, requires that the District prohibit the burning of cannabis wastes from residential and commercial growing and processing, and to regulate the circumstances under which cannabis waste burning is authorized.

Proposed changes to Rule 301, Non-Agricultural Burning Smoke Management, which provides for Right-Of-Way Clearing, Levee, Ditch, and Reservoir Maintenance Burning, with a District burn permit:

- Addition of a definition for Cannabis or Marijuana, as follows:
203 CANNABIS OR MARIJUANA: These terms shall be used interchangeably and means all parts of the plant *Cannabis sativa* Linnaeus, *Cannabis indica*, or *Cannabis ruderalis*, including marijuana as defined by California Health and Safety Code Section 11018, as may be amended, whether growing or not; the seeds thereof; the resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin. The prohibitions of Section 302 of this Rule do not apply to “industrial hemp” as defined by California Food and Agricultural Code Section 81000, as may be amended, or California Health and Safety Code Section 11018.5, as may be amended.

[Note: This definition of “cannabis” is substantially the definition of Health and Safety Code 11018 and that of the Placer County Cannabis Regulation (Placer County Code Ch. 10, art. 8.10), and the City of Roseville and other jurisdictions in the state. The definition exempts “industrial hemp” which is an agricultural product governed by Department of Food and Agriculture in accordance with the provisions of Division 24 (commencing with Section 81000) of the Food and Agricultural Code.]

- Amendment of Allowable Combustibles to prohibit or subject to additional permit conditions the burning of cannabis, as follows:

302 ALLOWABLE COMBUSTIBLES: The only allowable combustibles that can be burned is vegetation originating on the premises which is reasonably free of dirt, soil, and visible surface moisture. The burning of cannabis (Cannabis sativa Linnaeus, Cannabis indica, or Cannabis ruderalis) for disposal purposes is prohibited. The burning of poison oak (toxicodendron diversilobum) or oleander (nerium oleander) for disposal purposes may be prohibited or may be subject to additional permit conditions under Section 303.
- Rule 301 provisions in Section 312, that provides for open burning conducted by public officers that would include the burning of cannabis to abate a fire hazard, is unchanged.

Proposed changes to Rule 302, Agricultural Waste Burning Smoke Management, which provides for burning associated with the raising of crops, with a District burn permit:

- Addition of a definition for Cannabis or Marijuana, as follows:

204 CANNABIS OR MARIJUANA: These terms shall be used interchangeably and mean all parts of the plant Cannabis sativa Linnaeus, Cannabis indica, or Cannabis ruderalis, including marijuana as defined by California Health and Safety Code Section 11018, as may be amended, whether growing or not; the seeds thereof; the resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin. The prohibitions of Section 301 of this Rule do not apply to “industrial hemp” as defined by California Food and Agricultural Code Section 81000, as may be amended, or California Health and Safety Code Section 11018.5, as may be amended.

[Note: This definition of “cannabis” is substantially the same as the definition of Health and Safety Code 11018 and that of the Placer County Cannabis Regulation (Placer County Code Ch. 10, art. 8.10), and both exempt “industrial hemp” which is an agricultural product Department of Food and Agriculture in accordance with the provisions of Division 24 (commencing with Section 81000) of the Food and Agricultural Code. It is intended that the open burning of waste from the growing of industrial hemp be treated by Rule 302 in the same manner as other crops.]

- Amendment of Prohibitions on Open Burning to prohibit the burning of cannabis, as follows:

301 PROHIBITIONS ON OPEN BURNING: Except as provided in Regulation 3, no person shall use open outdoor fires (including the use of a burn barrel) for the purpose of disposal or burning of any disallowed combustibles. The open burning of waste from cannabis (Cannabis sativa Linnaeus, Cannabis

indica, or Cannabis ruderalis) grown or processed for commercial purposes is prohibited.

Proposed changes to Rule 305, Residential Allowable Burning, which provides for the burning of vegetative material grown and burned on the premises of at residence:

- Amendment of the definition for Allowable Combustibles to exclude cannabis, as follows:

201 ALLOWABLE COMBUSTIBLES: Vegetation originating on the premises of a residence, limited to the following: dry trees and trimmings, dry brush/shrubs, dry leaves, pine needles, grasses and forbs, dry plants and flowers, dry weeds, and dry vines. Lawn clippings, oleander (nerium oleander), cannabis (Cannabis sativa Linnaeus, Cannabis indica, or Cannabis ruderalis), and poison oak (toxicodendron diversilobum) are excluded. Vegetation that is not reasonably free of dirt, soil, and visible surface moisture, is not an allowed combustible.

- Addition of a definition for Cannabis or Marijuana, as follows:

203 CANNABIS OR MARIJUANA: These terms shall be used interchangeably and mean all parts of the plant Cannabis sativa Linnaeus, Cannabis indica, or Cannabis ruderalis, including marijuana as defined by California Health and Safety Code Section 11018, as may be amended, whether growing or not; the seeds thereof; the resin extracted from any part of the plant; and every compound, manufacture, salt, derivative, mixture or preparation of the plant, its seeds or resin. The prohibitions of Section 302 of this Rule also apply to “industrial hemp” as defined by California Food and Agricultural Code Section 81000, as may be amended, or California Health and Safety Code Section 11018.5, as may be amended.

[Note: This definition of “cannabis” is differs from that of the definition of Health and Safety Code 11018 and that of the Placer County Cannabis Regulation (Placer County Code Ch. 10, art. 8.10), in that “industrial hemp” is included in the definition and is not exempt. The purpose of inclusion of industrial hemp is to eliminate the need for enforcement personnel to identify industrial hemp that is burned as waste on the premises of a residence from other types of cannabis.]

- Amendment of Section 103.2 to allow the use of “burn barrels” in areas exempted from the state’s ban on residential waste except for vegetative materials grown on the property, as follows:

103.2 Exempt Areas: Effective January 1, 2004, ~~on burn days only, the burning fires for the disposal of dry, non-glossy paper and cardboard originating from, and being burned on the premises of a residence, or the use of a burn barrels, or both,~~ may ~~only be allowed~~ be burned if an exemption has been approved by the District Board of Directors that meets all the following subsections 103.2.1 through 103.2.46.

103.2.1 Burning is only conducted on burn days, and

103.2.2 The dry, non-glossy paper and cardboard to be burned originates from, and will be burned on, the premises of a residence.

[The Iowa Hill area of Placer County is the only sub-area area in Placer County that meets the state's requirements for an exemption. The exemption was first requested by the District and approved by the Air Resources Board in 2005, renewed in 2013, and a subsequent renewal of the 5-year exemption is now being sought. Although provided for in the state regulations, Rule 305 when adopted did not allow burn barrel use under the exemption, and that oversight is being corrected.]

In conclusion, the District's concerns over nuisance smoke impacts the open burning of cannabis waste and that these impacts would increase with increased legalization of cannabis growing, have led the District staff to propose prohibiting, or restricting through permit requirements the burning of cannabis waste, in the same manner that existing provisions of District Rules and Regulations prohibit the burning of poison oak and oleander. The State's emergency cannabis cultivation licensing regulation for commercial growing operations does not authorize the burning waste; the sole options for cannabis waste disposal composting and transfer to a solid waste disposal facility by a local agency or a waste hauler franchised, contracted, or permitted by a local agency, or self-haul, of cannabis wastes from State licensed cannabis cultivation. In addition, Rule 305 is amended to allow the use of burn barrels to burn dry paper or cardboard in an area that has been exempted from the State Airborne Toxics Control Measure for outdoor residential waste burning.

Public Outreach

The public hearing was noticed 30-days before the District's Board Meeting on July XX, 2018, in the Auburn Journal, a newspaper of general circulation. The proposed rule amendments were also posted on the District's webpage with a link from the Placer County webpage on the County's Cannabis Ordinance.

An e-mailed notice, advising of the District's proposed rule amendments was sent to the Placer County Executive Officer, the Sherriff's Department, Placer County Building - Code Enforcement, Placer County Facilities – Environmental Utilities, Placer County CDR – Environmental Health, Western Placer Waste Management, and the City and Town Managers, as well as City and Town code enforcement staff.

As of this writing, there has been no written public comment.

Analysis and Findings

The following Analysis and the subsequent Findings are intended to address the requirements set forth in the California Health and Safety Code relating to adoption of a new or amended District Rule, as well as other State statutes referenced herein.

Cost-Effectiveness of a Control Measure

California Health & Safety Code (H&S) Section 40703 requires a District to consider and make public “the cost-effectiveness of a control measure”. The adoption of amendments to Regulation 3, Rule 301, 302, and 305 may increase costs to residents who would have otherwise burned cannabis waste instead of composting on site or disposing of the waste through green waste collection services or by self-hauling to a solid waste disposal facility. The amendments otherwise reduce enforcement and compliance costs to the District with regard to nuisance smoke from cannabis burning, and will have the beneficial effect of preventing such nuisances from occurring. Violations of the prohibitions on cannabis burning will be a violation of burning requirements (i.e. burning of material that is not allowed to be burned), which is less problematic for the District to enforce than nuisances.

Socioeconomic Impact

Health and Safety Code Section 40728, in relevant part, requires the Board to consider the socioeconomic impact of any new rule if air quality or emission limits are significantly affected. However, Districts with a population of less than 500,000 persons are exempted from the socioeconomic analysis. In 2015, the population of Placer County was approximately 375,391 persons (US Census Bureau), which means that the District is exempt from this requirement.

California Environmental Quality Act (CEQA)

The changes in Regulation 3, Rule 301, 302 and 305 that prohibit or restrict the open burning of cannabis waste will result in a reduction in emissions discharged to the atmosphere. The change in Rule 305 to extend the state’s exemption on the burning of dry paper and cardboard to include the use of a burn barrel for burning will likely not result in an increase or decrease in material burned, and may result in improved combustion and less emissions if a burn barrel is used. The use of a burn barrel would have the significant collateral benefit of reducing the likelihood that the fire would escape. California Public Resources Code Section 21159 requires that an environmental analysis of the reasonably foreseeable methods of compliance be conducted. Compliance with the proposed changes to Regulation 3, Rule 301, 302 and 305, are expected to result in a reduction in emissions. Therefore, the proposed regulation and rule changes will not cause any significant adverse effects on the environment and may result in reducing impacts.

Staff finds that the proposed rule is exempt from the California Environmental Quality Act (CEQA) because 1) the changes proposed are administrative or will lessen emission impacts from burning and are not expected to have a significant adverse effect on the environment (CEQA Guidelines §15061(b)(3)) and 2) it is an action by a

regulatory agency for protection of the environment (Class 8 Categorical Exemption, CEQA Guidelines §15308).

Findings

- A. **Necessity** – The changes to Regulation 3, a Rule 301, 302, and 305 are necessary to protect the health and welfare of Placer County residents by prohibiting or restricting cannabis waste burning that otherwise may create nuisance smoke, and providing for a means of burning dry paper and cardboard pursuant to the state exemption in a burn barrel, which lessens emissions from such burning and reduces the potential fire hazard.
- B. **Authority** – California Health and Safety Code, Sections 40000, 40001, 40701, and 40702 are provisions of law that provide the District with the authority to amend these Rules.
- C. **Clarity** – The proposed changes are expected to be easily understood.
- D. **Consistency** – The regulation is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, or state or federal regulations. Although possessing or growing cannabis remains a federal crime, the District rules do not of themselves authorize possession or growing of cannabis, but instead limit how cannabis waste is disposed of if it is possessed.
- E. **Non-duplication** – The regulation does not impose the same requirements as an existing state or federal regulation.

Reference – All statutes, court decisions, and other provisions of law used by the District in interpreting this regulation is incorporated into this analysis and this finding by reference.

Exhibits

- Exhibit 1: Cannabis Ordinances & Open Burning Requirements
- Exhibit 2: Rule 301 - Non-Agricultural Burning Smoke Management
- Exhibit 3: Rule 302 - Agricultural Waste Burning Smoke Management
- Exhibit 4: Rule 305 - Residential Allowable Burning

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EXHIBIT 1

Cannabis Ordinances & Open Burning Requirements

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EXHIBIT 1

Cannabis Ordinances & Open Burning Requirements

Jurisdiction	Residential open burning	Cannabis/Marijuana Ordinance Code	Outdoor growing	Residential growing	Commercial growing	Odor nuisance
Auburn	Y	Ch. 159.019	Prohibited	< 6 plants	Prohibited	No discussion
Colfax	Y	Ch. 17.162	< 6 plants, < 100 sq. ft., 10 ft. setback	< 6 plants, < 100 sq. ft.	Prohibited	Adjacent properties
Lincoln	N	Ch. 18.34	Prohibited	< 6 plants, 50 sq. ft.	Prohibited	No discussion
Loomis	Y	Ch. 13.46	Prohibited	Prohibited	Prohibited	Any growing is considered nuisance
Rocklin	N	Ch. 17.81	Prohibited	< 50 sq. ft.	Prohibited	Adjacent properties
Roseville	N	Ch. 19.63	Prohibited	< 6 plants (non-medical), < 50 sq. ft. (medical)	Prohibited	Adjacent properties
Placer County (Unincorporated Areas)	Y	Ch. 8.10	< 6 plants, < 50 sq. ft., 100 ft. setback	< 6 plants, < 50 sq. ft.	Prohibited	Adjacent properties

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EXHIBIT 2

**Rule 301, Non-Agricultural Burning Smoke Management
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EXHIBIT 3

**Rule 302, Agricultural Waste Burning Smoke Management
With Amendments Shown**

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EXHIBIT 4

**Rule 305, Residential Allowable Burning
With Amendments Shown**

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