

Public Workshop & Stakeholder Comments

Stakeholder Meeting with HPBA July 9th, 2009, 4:00 pm

Attendees: Jeannie Kendrick, Stove Connection
Amie Ryan, Ryan Brothers Chimney Sweeping
John Crouch, HBPA
Kaity VanAmersfaro, HBPA Pacific
Peter Ross, HBPA Pacific
Keith Bond, Valley Stove & Chimney
Rusty Savard, A.E.S
Allan Heller, Custom Fireside

Allan Heller

Comment #1: **The District is not focusing on the real problem. You need to eliminate open wood burning and fireplaces. Providing incentives for changing open hearth fireplaces to gas logs is a waste of fuel.**

Response: The District is focusing on residential wood combustion that is the single largest source of particulate matter in the wintertime season. Although certified wood stoves and pellet stoves are cleaner than open wood burning and fireplaces on a per log basis, they generally emit more on a per day basis because certified devices and pellet stoves burn more fuel for a longer duration. Consequently, certified devices contribute significantly to the air quality problem. Nevertheless, due to public opposition to Staff's original proposal, Staff will recommend retaining the provision that allows certified wood stoves and pellet stoves to be used on days with moderate air pollution.

The District's voucher program provides incentives to convert high emitting open hearth, wood burning fireplaces to gas logs that emit very low levels of particulate matter. It is an improvement if someone who was burning wood periodically for ambience in an open hearth fireplace switches to gas logs to provide that ambience. Staff does not recommend nor suggest that an individual use gas logs as a heating device. Because of the health benefits associated with a decrease in particulate matter pollution, Staff does not consider this to be a waste of fuel.

Comment #2: **A lot of our clients are frustrated with upgrading their device to a pellet or certified device and then being told they cannot use that device on some days. Customers are not upgrading and they are not complying.**

Response: Aurora's survey data shows that a large segment of the population is complying. The compliance rate to date is excellent and Staff feels as

people receive more education about the Check Before You Burn program (CBYB) compliance rates could increase. In general, once a person has received education about the CBYB program, they understand that if they comply with the rule, then on a bad air quality day they do contribute to the overall particulate problem.

The District does enforce the rule and has written a number of violations. The District issued 211 violations last season. People are required to check before they burn and comply with No Burn days. Additionally, Staff sees that people are still upgrading and there continues to be a number of applicants utilizing vouchers through our change out program.

Peter Ross

Comment #3:

I am frustrated that there is new, emerging technology that is being ignored. These newer technologies include a newer catalytic insert that could be used in fireplaces and pellet stoves that emit less than 1 g/hr of particulate. I would like to see a remove or retrofit open hearth fireplaces/uncertified stoves/inserts law. Oregon DEQ has something along these lines for mandatory removal of uncertified technology upon resale of property.

What about a program where visible smoke is not allowed from September to April? If someone was emitting visible smoke on any day they would get a ticket. The program would still be a two stage program with Stage 2 still prohibiting all burning on bad air quality days.

You should keep the incentive to upgrade devices. 80% are upgrading to gas anyways. If you want to eliminate Stage 1, have every day be no burning except with certified/pellet devices with no visible smoke allowed except for startup/shutdown. In the winter season, there would be no burning in fireplaces. Identify the gross polluters by visible smoke and fine them a significant amount to force them to get a certified/pellet device.

If you do eliminate Stage 1, the people who bought devices with the incentives are more likely to be non-compliers. I would be in support of a one-stage program if the District were to ban visible smoke every day.

Response:

Thank you for the suggestion. An option to prohibit visible smoke for the entire winter season would in effect ban all 155,649 fireplaces, 14,310 uncertified wood stoves and 44,184 uncertified wood inserts as well as tens of thousands of certified devices which are not capable (either by design or user operation) of burning without visible smoke on every day, not just on the bad air quality days. The cost of replacing or retrofitting all fireplaces and uncertified wood stoves/inserts is over \$400 million. In addition, this approach would burden our limited staff

resources by requiring enforcement on every day of the wood burning season instead of just No Burn days. Therefore staff does not recommend establishing a comprehensive winter time smoke ban at this time.

Replacement and retrofit requirements on property sale, like those in place in Oregon and other places, were considered and not recommended during the SB656 further study evaluation in 2006. That requirement is a more expensive control option than Rule 421 estimated to cost \$7.48/lb. An additional problem with a retrofit requirement is that it has a smaller short term benefit because only a small percent of homes are sold each year; therefore, replacement of dirty residential wood combustion devices happens over decades. The District needs PM2.5 reductions in the short term to meet federal deadlines. However, this strategy will be re-evaluated and if it would provide reductions needed for attainment, this requirement may be included in the PM2.5 attainment plan due to be completed in late 2012.

Because of the significant public opposition to eliminating the limited exemption for EPA certified and pellet stoves operating on Stage 1 days, Staff is now recommending workshop Option A, that keeps the limited exemption for those devices.

The District does enforcement on all No Burn days, including a prohibition of visible smoke from certified and pellet stoves/inserts on Stage 1 no burn days, which will help us to identify those in violation and educate them about the seriousness of wintertime pollution problems facing Sacramento County. The District continues to operate the wood stove and wood fireplace incentive program that assists in cleaning up the air quality.

Amie Ryan

Comment #4: **The incentive to upgrade devices is removed if you go with the recommended change of a one stage program. The preferred option is A so that you don't get push back from people who say why did they spend money to upgrade.**

Response: Staff has reviewed the comments received in response to the proposal presented at the workshops. After consideration of these comments, Staff is now recommending workshop Option A, that keep the limited exemption for certified and pellet stoves/inserts.

Comment #5: **Setting the threshold at 30 µg/m³ is too low. You should keep a two-stage or no visible smoke program or keep the current program with no changes. Going down 10 µg/m³ and going to a single stage program is too much. The District is going to upset those who have changed their devices to certified or pellet.**

Response: Thank you for your comments. Refer to the response to Comment 4 on retaining a two-stage program and the response to Comment 3 for a discussion of the “no visible smoke” approach. However, Staff’s recommended change in thresholds levels to 35 $\mu\text{g}/\text{m}^3$ for Stage 2 and 31 $\mu\text{g}/\text{m}^3$ for Stage 1 is necessary to account for the estimated forecast underprediction and the actual Stage 1 benefit of 4 $\mu\text{g}/\text{m}^3$.

John Crouch
Comment #6:

The compliance rate for the rule is pretty good. Why change the rule this year? It is too soon to make changes. Is there a concern that if you go too far, compliance will drop?

Response: The District will be designated as a nonattainment area for 24-hour PM_{2.5} health standard of 35 $\mu\text{g}/\text{m}^3$. Strengthening Rule 421 now by lowering the concentration thresholds will help to further reduce PM_{2.5} concentrations during winter months, potentially reducing the need for other, more costly regulatory measures. The District is required to develop a federally mandated attainment plan in late 2012 or early 2013. If the standards are not achieved by that time, then the District will have to consider the adoption of more costly measures to reduce PM_{2.5} emissions. Because three years of data are used to determine whether the health standards are met, additional wood burning emissions reductions must begin in 2010 to provide Sacramento the best chance of avoiding those additional regulations. The regulatory controls that could be avoided include controls on: agricultural, non-agricultural, and prescribed burning; fugitive dust from bulk materials storage and handling; fugitive dust from paved roads, unpaved roads, and agricultural operations; chipping and grinding operations and composting operations. In addition, tighter control efficiency standards for PM_{2.5} control devices (baghouses, wet scrubbers, electrostatic precipitators, etc.) may be considered. A more effective “Check Before You Burn” (CBYB) program may reduce the need for some of these additional measures and will reduce the number of unhealthy air quality days.

The reductions in PM concentrations due to Rule 421 have been significant; however, additional reductions are needed to meet the health standards by the deadlines. Staff has tried to balance health protectiveness with the number of additional days called under each option. The most health protective option is Option B, but Staff has not recommended that option because of the potential of a significant number of additional No Burn days. Due to this factor, there is concern that Option B may result in a decrease in compliance. Instead, Staff is recommending an adjustment to the current rule to account for forecast underprediction.

The Board may also choose to take no action at this time.

Comment #7: **Do you see a likelihood of an increase in enforcement?**

Response: No, Staff will continue to enforce Rule 421 on No Burn days and respond to complaints as needed.

Comment #8: **People need to burn correctly and operate their burning device properly. Devices are not designed to burn wet wood, tires and/or garbage. In some other areas, when the stove is not properly operated, the authority invites the store/retailer into the discussion with the opacity violator to teach proper operating techniques.**

Response: Thank you for the suggestion. District Rule 417 prohibits burning tires and garbage in a solid fuel device. The District does provide information on proper burning techniques in the wood smoke compliance course. We also provide a copy of the CARB Wood Burning Handbook, which provides information about wood burning, including proper wood storage and drying techniques. The CARB Wood Burning Handbook can also be found on the Spare The Air Web site at:
<http://www.sparetheair.com/burncheck.cfm>

Comment #9: **You can get where you want to go by increasing the compliance rate.**

Response: From the recent Aurora survey, the statistics on people aware of burning restrictions within Sacramento County and the number of people complying is very high. It is unlikely that the compliance rate will increase dramatically in the short term when reductions are needed before the PM2.5 attainment plan is due. With continued enforcement and education, Staff would expect an increase in compliance rates over time.

Jeannie Kendrick

Comment #10: **People aren't complying right now.**

Response: Aurora survey results show that compliance rates are high but not 100%. Staff feels this is an excellent compliance rate in the beginning years of a new program.

Keith Bond

Comment #11: **Why group all certified/pellet devices in the same category. The EPA certification standard is set at around 7g/hr, but there are newer stoves which emit less than 1 g/hr.**

Response: On very poor air quality days when the air quality is expected to exceed federal health standards, even these devices would be contributing to the problem. The recommended option does allow for certified/pellet devices to burn on Stage 1 days when fireplaces and non-certified devices cannot. Also, on days when the air quality is expected to be poor but not over the health standards, these cleaner burning devices still contribute to PM2.5 concentrations and can have a health impact on

a community level.

Public Workshop La Sierra Community Center, Carmichael
July 14, 2009, 6:00 pm

Attendees: SKIP AYRES, Custom Fireside
ANNE IACCOPUCCI, Breathe California
AMIE RYAN, Ryan Brothers Chimney Sweeping
JEFF HADDEN, NPC Firewood
B LODGETT L SCHELDR
DON SWAIN DAVID BURNS
MEL & ESTELLE SYLVIN S PLOY
FRED LYTHGOE MILKA LAVEVIC
MIKE ROGERS BILL BLACKBURN
ANN PARSONS MARVIN LAUER
BARRY SMITH CHRIS JOHNSON
E AHART BAILEY HEISMAN
CURT FOLEY STACEY KING
RUTH PERSON MIKE BULLER
CLAUDIA MOORE WILLIAM TRUMBALL
JOHN SVER DAVID HUMPHERS
AL HUGHES HILMER FELTON
SUSAN MARVEL LARRY PINNEY
PHIL MOCETTINI PETER KITECK
KATHLEEN & FARNK ROMANO
MARILYN DITO R MIDDLETON
KEN WHITALL-SCHENTIE CURTIS KANFMAN
DENNIS KAYL +3 REFUSED TO SIGN

Written comments received from Marilyn Dito dated July 15th

Comment #12: **From the slide “Air Quality Benefits”, the last bullet states 40% fewer days above the federal health standards. How many days is 40% fewer? Please give actual numbers. What 3 methods were used to back up these results?**

Response: A 40% reduction in days above the federal health standards is 13 fewer days. The analysis of the benefits was completed by STI using cluster analysis, Chemical Mass Balance (CMB) and numerical modeling. Refer to the “Rule 421 Effectiveness Analysis and Results” section in the Staff report for additional details.

Comment #13: **“Why amend Rule 421” slide, 3rd bullet, please provide data from the studies. Who did the study? How long did it last? What was actually studied, the criteria? Who participated? Since 421 came into effect in 2007, and studies were conducted in 2007, how much studying actually took place?**

Response: The effectiveness studies were actually conducted in 2009. Staff contracted Aurora Research Group (Aurora) and Sonoma Technologies

Inc (STI) to analyze the program effectiveness and benefits. Aurora's phone survey examined behavior of residents in Sacramento County during the 2008/2009 winter season. Aurora's survey took approximately three months to complete and included responses from 400 randomly-selected residents who own wood burning devices. STI examined data from the past 8 years and took approximately 5 months. STI is working on a transport analysis with results to be detailed in the Board report for the September 24, 2009 Board Hearing.

Comment #14: **“Proposed Rule Changes” slide, rather than 5-year average category please state the actual proposed to be No Burn (days). An average is misleading.**

Response: Staff is unable to predict the exact number of days for future seasons. The “Impacts and Benefits from Potential Rule Changes” section of the Staff report shows the number of days per season over the past 5 years, assuming the CBYB program was in effect each of the last 5 years. Depending on weather patterns, the number of No Burn days can vary.

Comment #15: **Keep the Rule the same for at least one more year or maybe two to get all folks (who burn) on board. This will give more time for people to adjust their routines when they are thinking of burning a fire. The Rule already works so give it more time. Stop expecting so much so soon and you'll see better numbers.**

Response: Thank you for your comments (refer to Comment 6.)

Written comments received from Claudia Moore dated July 14th

Comment #16: **I like the recommended option. We need cleaner air in Sacramento.**

Response: Thank you for your support. However, Staff also received many comments from residents and industry representatives who expressed concerns about eliminating the current two-stage program (see response to Comment #4). Staff has reviewed the comments received in response to the proposal presented at the workshops. After consideration of these comments, Staff is now recommending workshop Option A, that maintains the limited exemption for EPA certified and pellet stoves/inserts. The Recommended Option is slightly less health protective than the most protective, Option B, but would cause a much smaller increase in the number of No Burn days.

Written comments received from Frank Romano dated July 16th

Comment #17: **I'm opposed to the proposed restrictions. In 1975 I installed a county approved fireplace insert with hydro coil. This provides heat and hot water for my home using alternative energy sources. Why not keep the present rule in effect for another year and get better information about program effectiveness. You may find at**

that time that more people are complying, eliminating the need for more restrictive regulations.

Response: The reductions in PM concentrations due to Rule 421 have been significant; however, additional reductions are needed to meet the health standards by the deadlines. There are still too many days that are over the federal health standards. Additionally, noncertified wood burning devices (pre-1992 units) are the largest contributor to residential wood combustion emissions.

See also response to Comment #6.

Written comments received from Bill Blackburn dated July 16th

Comment #18: **It is critically important to me that my family minimize exposure, as much as practical, to PM2.5 and other toxic constituents that are generated from fireplace smoke.**

Response: Thank you for your support. In addition to PM2.5, wood smoke also emits other air contaminants including volatile organic compounds (VOCs) and nitrogen oxides (NOx) which are precursors to aerosol forms of PM2.5, and toxic and/or cancer-causing substances, such as benzene, formaldehyde and benzo(a)pyrene, a polycyclic aromatic hydrocarbon (PAH). In addition, wood smoke is a component of black carbon. See also response to Comment #16.

Comment #19: **I live in a neighborhood built in the early 1960s and many neighbors frequently burn in the winter and I know of no EPA type fireplaces in my area. As a result, the area is routinely smoky in the fall and winter. Every time my natural gas heater turns on, it pulls polluted air from outside neighborhood smoke, making it impossible to keep my home smoke free. Burning wood in an uncontrolled environment is literally "cave man" technology and must be sharply limited in major metropolitan areas like Sacramento.**

Response: Thank you for your support of Rule 421. As noted in the staff report, wood smoke causes significant health impacts. Wood smoke emitted from chimneys can actually enter into neighborhood dwellings, causing indoor air quality problems. See also response to Comment #16.

Comment #20: **The greenhouse gases emitted from fireplaces (namely CO2 and carbon black) contribute to global climate change and continuing to ignore this imminent problem puts us all at peril. I urge you to continue to strengthen Rule 421 and create a healthier environment for us all.**

Response: The commenter correctly identifies black carbon as a global warming pollutant that is emitted when burning wood. This rule is directed at improving the regional benefits from reducing particulate matter, but

reduction in wood burning from increasing the number of days would also reduce this global warming pollutant. See also response to Comment 16.

Written comments received from R Middleton dated July 23rd

Comment #21: **Why not let the current 421 rule run for a couple more years to get more data?**

Response: See response to Comment #6.

Comment #22: **What about all of us who got EPA approved inserts? It is unfair to eliminate the exemption for certified devices.**

Response: See response to Comment #4.

Written comments received from Jeff Hadden dated July 14th

Comment #23: **Give guidance on proper wood storage so people know how to burn only clean dry wood.**

Response: See response to Comment #8.

Comment #24: **I believe it is highly unfair for you to expect the citizens of this region to bear additional burdens to clean up the air in this region, when large utilities are not willing (referring to the 7/15/09 Sacramento Bee article on utilities backing away from high-voltage transmission line).**

Response: See response to Comment #84.

Oral Comments from La Sierra Community Center Public Workshop

Comment #25: **I bought a stove that was approved to Canadian standards, is my stove clean enough? Why not?**

Response: Wood stoves certified in Canada are tested using the Canadian Standard Association procedures. The Canadian standards are virtually identical to the EPA standards; however, in order to qualify for limited exemption from Rule 421 Stage 1 No Burn days, the device must be EPA Phase II certified.

Comment #26: **What are the surrounding counties doing to curtail wood burning? Why does the District have this rule if Placer and Yolo counties do not?**

Response: Bay Area Air Quality Management District and San Joaquin Air Pollution Control District have similar but more restrictive mandatory episodic curtailment restrictions of wood and other solid fuel burning. Yolo County has a voluntary No Burn program and the City of Davis has

been looking at adopting a mandatory curtailment program. Placer County requires replacement of uncertified stoves on property sale.

Staff is in the process of analyzing the transport effects within Sacramento County from rural to urban areas and of the surrounding counties on Sacramento and vice versa. Parts of Placer and Yolo Counties will be included in the PM2.5 nonattainment area and an assessment of the needed controls will be done by each District during the plan development required by U.S. EPA. The residents within Sacramento County are the most significant contributor to the wood smoke emissions in the District.

Comment #27: How much PM is coming from the Bay Area and other areas?

Response: Staff is in the process of analyzing the transport effects from surrounding areas and what impact Sacramento County has on other areas. Results are expected prior to the September 24th Board hearing and will be included in the Board package for the rule adoption.

Comment #28: No more government regulations are needed. Why is there another thing the government says we should do?

Response: The District is charged with protecting public health, in this case reducing the health risks from high levels of particulates in the air. There are many incentive strategies and regulations already in place to reduce particulate pollution problems, including reducing pollution from cars, trucks, buses, construction equipment, industrial and commercial boilers and power plants. Because fireplaces and wood stoves contribute 54% of directly emitted particulates, the Board adopted Rule 421 in 2007 to reduce wood smoke only on those days when air quality was forecast to be poor. However, the PM2.5 levels in the county are still above the federal health standards. Staff recommends adjusting this rule as the most effective way to achieve additional reductions in ambient PM2.5 levels with the least impact.

Comment #29: I made an investment on a clean burning technology 20 years ago. You can't change the rules now.

Response: As mentioned above in response to comment #28, the District is mandated to reduce the amount of particulates in the air. To that end, the District has the authority to regulate sources of air pollution. As to your investment, devices that are from 20 years ago are potentially not EPA Phase II certified devices. Phase II certification was not effective until 1992 and significant improvements have been made to solid fuel burning devices since the certification was effective.

Comment #30: The industry has worked hard to lower the amount of pollution being emitted from devices. Everyone should have the opportunity to burn with no visible smoke. Why not let very clean

devices burn?

Response: Staff recognizes that the industry has worked to reduce emissions from wood burning devices, however, even without smoke, particulates are still being emitted. Staff's recommended option maintains the two-stage mandatory curtailment, allowing certified and pellet devices to burn on days when open hearth fireplaces and non-certified devices cannot. On Stage 2 No Burn days, all burning is prohibited as any additional particulate matter on very poor air quality days would be adding to the unhealthy levels of particulates.

Comment #31: **Why not require the retrofit of devices upon sale of property? Nevada County is taking the action of requiring people to change out devices?**

Response: See response to Comment #3.

Comment #32: **How did you pick the threshold levels?**

Response: The option threshold levels were originally selected to limit wood burning to avoid exceeding the federal 24-hour health standard. The Rule 421 evaluation considered alternative thresholds that used new information about the actual benefits from the current Rule 421, actual air quality forecast accuracy, and thresholds used in other districts. Staff's recommendation adjusts the thresholds downward slightly to address forecast underpredictions, and the actual benefits achieved by the Stage 1 no burn requirements, to further protect public health.

Comment #33: **How do you know the health effects? What are the numbers dealing with health effects and how are they determined?**

Response: Many health studies on fine particle and wood smoke health impacts have been conducted by academic researchers and published in scientific and medical publications. We rely on these studies and information from air quality and health experts at other government agencies including the information listed below.

CARB sponsors some of the health studies and also reviews published health studies to estimate health impacts. A fact sheet on CARB's information can be found at:

http://www.arb.ca.gov/research/health/fs/pm_ozone-fs.pdf

Here is a link to CARB's recent review of wood smoke health impacts:

<ftp://ftp.arb.ca.gov/carbis/board/books/2009/012209/09-1-1pres.pdf>

<http://www.arb.ca.gov/research/health/healthup/citations01-22.htm>

EPA conducts similar reviews in setting federal PM2.5 standards. Here is a link to that information:

<http://a257.g.akamaitech.net/7/257/2422/01jan20061800/edocket.access.gpo.gov/2006/pdf/06-8477.pdf>

An EPA fact sheet of particulate matter health issues can be found at:
<http://www.epa.gov/oar/particlepollution/pdfs/pm-color.pdf>

The San Joaquin Valley Air Pollution Control District's medical expert prepared a brief summary of several health studies specifically related to wood smoke. Here is a link to that summary (See Appendix A):
http://www.valleyair.org/Board_meetings/GB/agenda_minutes/Agenda/2008/October/Item_07/Oct%2016%202008_Agenda%20Item_7.pdf

Comment #34: **When was Rule 421 adopted?**

Response: Rule 421 was adopted in October 2007.

Comment #35: **What other efforts are there to reduce pollution on No Burn days?**

Response: Residential wood smoke is one of the last, largely unregulated, large sources of PM_{2.5} emissions. There are a number of State and District rules that reduce emissions of particulate and particulate precursors from cars, trucks, trains, agricultural operations, internal combustion engines, boilers and painting operations. The District is required to develop a plan to meet the federal health standards and submit that plan to EPA for approval in late 2012. We will consider whether the existing strategies, along with Rule 421, are sufficient to meet federal health standards. If not, then the District will have to consider the adoption of more costly measures to reduce PM_{2.5} emissions, such as requiring replacement or retrofit of fireplaces and wood stoves on resale of homes, controls on: agricultural, non-agricultural, and prescribed burning; fugitive dust from bulk materials storage and handling; fugitive dust from paved roads, unpaved roads, and agricultural operations; chipping and grinding operations and composting operations. In addition, tighter control efficiency standards for PM_{2.5} control devices (baghouses, wet scrubbers, electrostatic precipitators, etc.) may be considered. A more effective "Check Before You Burn" (CBYB) program will reduce the need for some of these additional measures.

There are also other episodic controls to regulate PM emissions. There are sources within the District with permit conditions that prevent the equipment from being operated on poor air quality days. Agricultural burning is also prohibited on poor air quality days throughout the year. Lastly, there is District Rule 701 that establishes control and advisory procedures on very unhealthy air quality days.

Comment #36: **How does the recommended change compare to the single stage threshold proposed in 2007?**

Response: Rule 421 was originally proposed in 2007 as a single stage program with

a 35 $\mu\text{g}/\text{m}^3$ threshold. Currently, the single stage threshold proposed is 30 $\mu\text{g}/\text{m}^3$, consistent with SJVUAPCD Rule 4901. Note that this is no longer Staff's recommended option. See response to Comment #16.

Comment #37: **If you are burning and not smoking on a No Burn day, is that legal?**

Response: No, wood burning on a No Burn day is illegal unless exempt.

Comment #38: **Rather than make a change now, why not give it another year or two to let public adjust and improve? Also, the District should do additional marketing.**

Response: See response to Comment #6. In response to additional marketing, the District does marketing as our budget allows and continues to expand outreach opportunities with supporting partners to educate residents. Education is also a part of every violation issued by the District.

Comment #39: **What are the specifics of the goal of the District and the health standards?**

Response: The District's overall mission is to achieve clean air goals by leading the region in protecting public health and the environment through innovative and effective programs, dedicated staff, community involvement, and public education. Rule 421 is specifically intended to help meet state and federal particulate matter health standards, but contributes to other health objectives such as reducing toxic pollutant and greenhouse gas emissions, and increasing walkability in our community.

See also the response to Comment #28. For details of the health standards see Comment #55.

Comment #40: **You can't comply even with an EPA certified device? Go after and put burden on fireplaces and gross polluters. Going from 23 days to 31 days is about once every four days that I will be unable to burn.**

Response: Although certified wood and pellet stoves/inserts are cleaner than open fireplaces on a per log basis, because they are often used as an alternative heat source they generally emit more on a per day basis because they burn more fuel for a longer duration. Therefore, they still contribute significantly to the air quality problem. Nevertheless, because of public opposition Staff's recommended option (previously workshop Option A) retains the limited provision that allows certified wood stoves and pellet stoves to be used on days with moderate air pollution. Under this option, the total number of No Burn days is expected to increase from 23 days to 28 days.

Comment #41: **I've built hundreds of homes with zero clearance fireplaces. Four more days of avoided exceedances isn't enough to justify the increase in no burn days.**

Response: Thank you for your comment. Staff has changed the Recommended Option so that there will be 5 additional No Burn days (previous recommendation would have resulted in 8 additional No Burn days). Pollution levels are expected to decline by up to 23 percent on each of the 5, but based on historic data an estimated three additional days over the federal health standards will be avoided. In general, on the other days a 23% improvement in air quality is still not sufficient to meet federal health standards. However, the actual number of days avoided may be higher due to future benefits from other strategies being implemented to reduce particulate pollution. The Board of Directors will consider whether these public health benefits and potential avoided regulations are sufficient to outweigh concerns over increased number of no burn days.

Comment #42: **I burn wood and shut off my gas years ago. Why don't you give me an option to convert to a compliant system?**

Response: If burning wood or pellets provides the only source of heat for your home, then burning is always allowed. If you have another source of heat in your house, you will need to use that source on No Burn days. Other options for heating your home include natural gas, propane, or electric heaters. The District has financial incentives available to replace existing dirty devices with a cleaner burning device. We encourage you to take advantage of those incentives to reduce the wood smoke health impacts on you, your family, and your community.

Comment #43: **How is the forecasting done and how accurate are the measurements?**

Response: Forecasting is contracted to Sonoma Technology, Inc. Sonoma Technology, Inc. (STI) is a firm providing air quality and meteorological research and services. STI has performed air quality forecasting continuously since 1996 and has intimate knowledge of the meteorological conditions that influence both ozone and PM_{2.5}. STI has developed forecasting tools (forecast guidelines and objective tools) for over 40 cities across the United States as well as for cities abroad. In addition, STI developed and gave regional courses on PM_{2.5} forecasting to assist over 25 cities throughout the United States transition from ozone-only forecasting to both PM_{2.5} and ozone forecasting. As part of this transition project, STI issued daily PM_{2.5} forecasts for about 15 cities over the course of a winter season and developed statistical forecasting tools for 22 cities. STI also forecasted air quality for

the 2002 Olympics held in Salt Lake City, Utah, and continues to issue daily ozone and PM_{2.5} forecasts for several cities throughout the United States. STI designed, developed, and taught courses on air quality forecasting and forecast tool development at EPA's National Air Quality Forecasting conferences for several years and authored EPA's guidance document on ozone and PM_{2.5} forecasting. The forecast data is used by AQMD Staff to determine and announce the next day Check Before You Burn category i.e. No Burn day.

Keep in mind that the forecast is a prediction of the PM_{2.5} concentration that would occur if a No Burn day were not called. Therefore, when a No Burn day is called, the actual concentration that occurs on that day should be lower than the forecast, which, upon first impression, makes the forecast look inaccurate. To assess the forecast accuracy, it is necessary to account for the average benefit of Stage 1 and Stage 2 days before making the comparison between forecast and observed concentrations. Taking this factor into account, last season No Burn days were correctly called 28 times out of 38 times, a forecast accuracy of 74%.

Comment #44: **I would like to see the strictest possible requirements on wood burning. I'm concerned about my kids and my neighbor's burn 7 days a week.**

Response: Thank you for your support. Although Staff is not recommending the most health protective of the options proposed, the recommended option will significantly strengthen the rule and improve its effectiveness. See response to Comment #16.

Comment #45: **What is the source behind the emissions information?**

Response: CARB is responsible for calculating the emissions for residential wood combustion (RWC) for all the air quality districts in California. The current emission inventory numbers are presented in the emissions inventory of the Staff report; however CARB is in the process of updating the RWC emission inventories for all the air quality districts in California. Staff has presented RWC emission inventory in the Staff report based on these assumptions. For additional information see the Emissions Inventory section of the Staff report.

Comment #46: **What are we allowed to burn?**

Response: Any wood, pellet, or other solid fuel is subject to Rule 421 burning restrictions on poor air quality days. Rule 417 prohibits the burning of garbage, treated wood, plastic, rubber, waste petroleum products, paints, solvents, coal, glossy/colored paper, particle board or other material not intended by a manufacturer for use as fuel in a solid fuel

burning device. Electric fireplaces, natural gas, and propane-fired devices are not regulated by Rule 417 or Rule 421 and may be used anytime.

Comment #47: **Is this being done to get money from the Federal government?**

Response: No, the District does not receive any additional federal funding for implementing this rule. The District is mandated to reduce particulate pollution to achieve the federal health standard. The District is required to submit a plan to show how the standard will be achieved. If no plan is submitted that demonstrates the federal health standards will be met by the required deadline, then the federal government can withhold federal funding for the Sacramento region.

Comment #48: **Who are the Board of Directors?**

Response The Board of Directors is body of elected officials who oversee the activities of the District. The AQMD's 14-member Board of Directors is composed of all five Sacramento County Supervisors, four members of the Sacramento City Council, one member representing each of the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and one member representing the Cities of Galt and Isleton. A list of the current Board members can be found on our website: <http://www.airquality.org/bod/directors.shtml>

Comment #49: **Is there a public hearing with testimony?**

Response: Yes. The public hearing for Rule 421 is expected to be conducted on September 24, 2009 at 9:30 am at the Board of Supervisors Chambers, 700 H Street - Room 1450.

Public Workshop Tsakopoulos Library Galleria, City of Sacramento
July 15, 2009, 5:30 pm

Attendees: PERRY TROOLIN, Rustice Fireplace
DAVID KELLY, Clear Skies
DAVE & NORMA KOPP, Leisure Time Pellet Stoves
JARED KOPP, Leisure Time Pellet Stove
PETER ROSS, HBPA
EARL WHITYCOMBE WILLIAM PETERSON
RAY NIELSEN ED SUAREL
SEAN WARD KITTY WILSON
+2 REFUSED TO SIGN

Written comments received from Jane Penly dated July 15th

Comment #50: **The Rule does not consider retired people who depend on the heat source for warmth and keeping utilities down. EPA stoves emit limited pollution and meet current EPA standards; therefore these devices should not be eliminated as heat sources in the current**

economy.

Response: In response to public comments, Staff is now proposing to maintain the limited exemption for EPA certified stoves on Stage 1 No Burn days. They will continue to be prohibited from operating on Stage 2 No Burn days, and we are proposing a lower threshold for triggering those No Burn days to help achieve federal health standards. However, residents may qualify for a Hardship Waiver pursuant to Section 403 and be allowed to burn on all No Burn days. Forms to apply for this waiver can be found on our website or by contacting the District.

Written comments received from Edward Suarez dated July 15th

Comment #51: **Can you tell the difference between automobile pollution and wood fire burning pollution?**

Response: Yes. Most sources of pollution have a “fingerprint” of chemical species that identify the source of the emissions. Such an analysis was performed on particulate samples collected in Sacramento County. For more information please see page 14 of this Staff report.

Comment #52: **Not everyone has the daily paper to know the No Burn days.**

Response: Other than the newspaper, the Check Before You Burn (CBYB) program has several ways to check if current day and/or the next day is a No Burn day, including calling a toll free number (1-877-NO-BURN-5), consulting our website, and listening to radio or TV weather broadcasts. You can also sign up for an E-mail alert sent daily.

The CBYB Web site is:

<http://www.sparetheair.com/burncheck.cfm>

To sign up for the Air Alert daily e-mail please use the following link:

<http://www.sparetheair.com/airalert.cfm>

Comment #53: **Some people are burning green wood. What is seasoned firewood and how do you know what the moisture content is?**

Response: Rule 417 prohibits the advertising of wood as “seasoned” or “dry” unless the wood has a moisture content of 20 percent or less by weight. Staff recommends the use of only seasoned or dry wood. When buying wood advertised as “seasoned” CARB recommends looking for:

- Dark colored, cracked ends
- Light in weight
- Dry wood rings with a resonant “crack”
- Easily peeled or broken bark.

The CARB Wood Burning Handbook can also be found on the Spare The Air Web site at:

http://www.sparetheair.com/publications/wood_burning_handbook.pdf

Comment #54: **Are there any reports from local hospitals on residents suffering from smoke particles?**

Response: An increase of hospital admissions during times of high particulate matter concentrations has been documented in health studies. For more information on the health impacts of Particulate Matter see the "Health Impacts" section of this Staff report.

Comment #55: **What are the federal, state and city health standards?**

Response: The federal 24-hour PM_{2.5} health standard is 35 µg/m³ and the annual average standard is 15 µg/m³. California's annual health standard for PM_{2.5} is 12 µg/m³. California does not have a 24 hour standard for PM_{2.5}, but they do have a 24 hour PM₁₀ standard of 50 µg/m³. There are no separate local standards. There are no city health standards for particulate matter pollution.

Written comments received from Peter Ross dated July 15th

Comment #56: **Keep the incentive for homeowners with non-EPA certified appliances and open fireplaces to upgrade to cleaner technology by maintaining the 2-stage program.**

Response: See response to Comment #4.

Comment #57: **A no visible smoke year round rule would keep our air cleaner even on days we meet attainment and would most likely reduce the number of No Burn days needed to meet attainment.**

Response: See response to Comment #3.

Written comments received from Sean Ward

Comment #58: **For the sake of our health and the health of our children, my family asks you to pass the amendment to Rule 421 and that you continue your work to establish standards, which will require chimneys be smoke-free, 365 days per year, through the creation of mandates which specify clean-burning fireplace products and technologies such as natural gas. We live in midtown Sacramento and the air we breathe from late September through April is full of smoke; smoke which comes from neighborhood chimneys. We often cannot go on evening walks because the smoke filled air causes our daughter to have asthma attacks. We ask you to mandate gas technology, as clean-burning solutions are good for our air and our lungs, fair to homeowners, and fair to industry.**

Response: Thank you for your support for air quality goals. Although Staff is not recommending the most health protective of the options proposed, the recommended option will significantly strengthen the rule and improve its effectiveness Please see response to Comment #16.

Some comments have suggested a visible smoke option that would require all devices to emit no visible smoke, 365 days per year, which in effect would ban the use of wood burning fireplaces and uncertified devices on every day, not just on days with poor air quality. Staff is not recommending that at this time. Please see response to Comment #3.

Oral Comments from Tsakopoulos Library Galleria Public Workshop

Comment #59: **Are Board hearings open to the public and can I make comments?**

Response: Yes.

Comment #60: **Are sole source of heat burners exempt from all no-burn days?**

Response: Yes.

Comment #61: **Are there businesses in Sacramento County that contribute to the PM problem? Are those businesses regulated?**

Response: Yes, the District has over 4,000 permitted sources that are subject to various District rules that limit the release of air contaminants. These facilities include a variety of business types such as industrial and manufacturing plants, gas stations, paint shops, dry cleaners, power plants and boilers.

Comment #62: **I have a problem with eliminating the Stage 1 day certified device exemption. People would have no encouragement to upgrade a more polluting device. I would like to see a no visible smoke rule. There will be cleaner technology available in the future that will make it affordable for everyone.**

Response: Staff is now recommending a slightly less health protective alternative that maintains the exemption for EPA certified and pellet stoves. See response to Comment #4. Also, see response to Comment #3 for a discussion on a no visible smoke rule.

Comment #63: **Is there anyone beside the hearth products industry that would benefit who recommends the "no visible smoke" approach?**

Response: This option may encourage additional sales of hearth products that do not emit visible smoke, and provide greater health protection than the recommended option. See response to Comment #3.

Comment #64: **I would recommend an option to require retrofit of fireplaces to make them cleaner. Our company creates a catalytic fireplace insert to reduce fireplace emissions. I suggest changing the incentive program to convert every fireplace to a cleaner burning device.**

Response: Thank you for the suggestion. See the response to Comment #3 for a discussion of mandated retrofit requirements. Please note that our existing incentive programs encourage home owners in Sacramento County to replace older, more polluting units with cleaner burning devices. These programs currently do not incentivize catalyst retrofits for fireplaces because catalysts generally fail in three to five years with little incentive for owner/operators to replace the catalyst. We will continue to monitor development of new technology and revisit incentive program elements as appropriate.

Comment #65: **I understand that PM is carbon, and gets deep in the lung. I carry around asthma inhalers and I want the smoke out of the air. I support the proposed option.**

Response: Thank you for your support for air quality goals. Please see response to Comment #16.

Comment #66: **Don't eliminate recognizing certified devices/pellet as being cleaner burning devices.**

Response: Staff is proposing to keep the certified devices and pellet stoves exempt from Stage 1 No Burn days. Please see response to Comment #4.

Comment #67: **How does the number of days when an exceedance was avoided compare to the current number of days over the health standards? What are the additional measures if exceedances still exist? If we don't make the health standard deadline what happens?**

Response: A total of 20 days exceeding the health standards were observed last season. The days avoided last season was 13 days. For the additional measures that may be required if exceedances still exist see response to Comment #35. If we don't attain the health standard, EPA makes a finding of failure to attain, and we have to submit another plan within a year. Should we fail to submit a plan to meet attainment, we face sanctions. The plan must demonstrate that we will or have adopted sufficient additional control measures to attain "as expeditiously as practicable."

Comment #68: **I have an EPA approved the device, why can you say now that it is not good enough?**

Response: Wood smoke is a significant contributor to the PM_{2.5} emissions in Sacramento County. Although certified devices emit less than their noncertified counterparts, they still emit pollution. There are also enough certified devices in the county that, in aggregate, their emissions can't be ignored. Therefore, the program prohibits the use of certified devices on the worst air quality days.

Comment #69: **I burn firewood in an insert. Why not go after fireplaces first and then re-evaluate the program effectiveness? Why penalize everyone at once?**

Response: See response to Comment #3.

Comment #70: **My concern is that the District may eventually get rid of woodstoves to meet standards.**

Response: That is not a proposed option. Currently, the District's strategy to improve particulate matter air quality includes a three-pronged approach to reducing emissions from wood burning: providing financial incentives, Rule 417 which regulates new wood burning installations, and Rule 421 curtailment on poor air quality days that reduces burning from existing wood burning devices.

Public Workshop SMAQMD Office, City of Sacramento
July 16, 2009, 1:30 pm

Attendees: DAN SANFORD, Regency Fireplace Products
BILL ORLANDO, A.E.S.
RUSTY SAVARD, A.E.S.
TINA SUAREZ-MURIAS, CARB
YUSHOU CHANG, Placer County APCD
ERIC RASMUSSEN, RPA, SAR
CAYLYN BROWN, SAR
ANDREW TARBUSKOVICH, AAA Fireplaces & More
T LATHROP, Yolo Solano AQMD
DAVID KELLY, Clear Skies
RAQUEL LOPEZ, Breathe California
J ELDER, AAA Fireplaces
ROBERT WHITEHEAD
KURT TROMBINO

Written comments received from Robert Whitehead dated July 16th

Comment #71: **I have an EPA approved wood stove. My device is 72% efficient and emits 1.4 g/hr. I heat primarily with wood heat. Wood burning is an art, using dry seasoned wood makes for a hot fire and I go out and check that my chimney isn't smoking. My goal is little or no smoke. The AQMD should educate the public on proper burning. Healthy air is important. Diesel vehicles are exempt from smog check. I don't want to see smoke, so I'm in favor of devices that are low-emitting. Keep the current Rule 421. The AQMD needs to give exemptions to citizens with EPA approved stoves.**

Response: Thank you for your comments and efforts to limit wood smoke. The reductions in PM concentrations due to Rule 421 have been significant; however, additional reductions are needed to meet the health standards by the deadlines. Staff is proposing changes that will strengthen Rule

421 and make it more effective. Staff has changed the recommended option, as noted in the response to Comment #4.

Heavy duty trucks and buses have been subject to inspection for excessive smoke conducted by the California Highway Patrol weigh stations and other roadside locations since 1998. CARB has several other programs that subject heavy-duty diesel vehicles to periodic self inspection and idling regulations. More information on diesel enforcement programs is available at the following link:

<http://www.arb.ca.gov/enf/diesel.htm>

Other diesel vehicles are under state law to be incorporated into the Smog Check Program beginning January 2010. More information on this requirement is available at the following link:

http://www.bar.ca.gov/80_BARResources/05_Legislative/RegulatoryActions/FAQs%20for%20Diesels%201-8-09_GC.pdf

Written comments received from David Kelly dated July 14th and 16th

Comment #72: **If you use visible smoke to determine violations on No Burn days, then it only makes sense to incorporate that guideline in your rule to apply to all wood burning devices that do not emit visible smoke. EPA has spent millions in developing a new wood burning fireplace standard to be used by the states. You should make reference to it in your rules.**

Has the District considered the no visible smoke approach that other districts have used (Ringleman chart)? My company makes products that can be used to retrofit fireplaces to produce no visible smoke.

Response: Visible smoke is the current enforcement mechanism to observe violations because District inspectors will not go onto private property when inspecting for No Burn day violations. Rule 421 prohibits operation of EPA certified devices and pellet stoves that emit visible smoke on Stage 1 no burn days. For a discussion of the visible smoke option, please see response to Comment #3.

For open hearth fireplace catalyst technology devices, the District incentive programs currently do not incentivize catalyst retrofits for fireplaces because catalysts generally fail in three to five years with little incentive and no requirement for owner/operators to replace the catalyst.

Rule 417 governs the installation of new wood burning appliances and is not open for revisions at this time. The numbers show the significant majority of fireplace owners use their fireplace for aesthetic reasons. Because of the significance of our air quality problems and the large contribution from wood burning, Rule 417 prohibits the installation of new wood burning fireplaces. To allow installation of even lower

emitting fireplaces would increase emissions when compared to the current Rule 417. The EPA emissions standards program for fireplaces is voluntary, and even if a fireplace is voluntarily certified, data on low mass fireplaces indicates that they emit more than EPA certified and pellet stoves and fireplace inserts. As such, Staff would not recommend amendments to Rule 417 to allow installation of low mass wood-burning fireplaces.

Written comments received from Dan Sanford dated July 21st

Comment #73: **As an industry representative, I believe it is very important to maintain a distinction for EPA certified products. A 2 stage no burn system is very important in maintaining the public's confidence in their investment.**

Response: See response to Comment #4.

Oral Comments from SMAQMD Public Workshop.

Comment #74: **How many inspectors does the District have?**

Response: 14 inspectors throughout the County that inspect all permitted and unpermitted facilities and respond to air pollution complaints.

Comment #75: **Are you able to separate emissions from fireplaces from agricultural burning for instance.**

Response: No. However, agricultural burning is currently prohibited on the same days as Rule 421 prohibits burning. In addition, there is a smoke management program to limit the amount of agricultural burning that occurs on burn days to minimize impacts.

Comment #76: **Enforcement is based on visible smoke? So if you are around 1 g/hr with no visible smoke, is it legal to burn on a No Burn day?**

Response: No, it is not legal, but visible smoke is currently how we detect burning is occurring.

Comment #77: **If emissions from wood burning devices are going down, then shouldn't that be good?**

Response: Yes, when a new wood stove or pellet stove is compared to an old, uncertified wood stove. However, a common misperception is that EPA certified and pellet stoves are "better" than fireplaces. Looking at annual emissions, an individual EPA certified stove and some pellet stoves emit more than an individual fireplace because they generally burn more fuel for a longer duration. Currently estimates for an average winter day show the total emissions from fireplaces are less than the total emissions from all EPA certified and pellet stoves. While certified devices and pellet stoves are designed to pollute less than fireplaces and non-certified wood stoves, their emissions are about an order of

magnitude higher than gaseous fueled devices.

Comparison of Emission Factors

Technology	PM2.5 Emission Factor (lb/mmBtu)
Certified Wood Stove (Catalytic)	1.62
Certified Wood Stove (Non-Catalytic)	1.16
Pellet Stove	0.18
Propane Fireplace	0.01
Natural Gas Fireplace	0.01
Gas Heater	0.01
Electric	None

Comment #78: **Forcing people to use natural gas, propane or electricity is not fair when there are technologies to reduce PM emissions dramatically and might achieve goals.**

Response: Even very clean solid fuel devices emit more than 10 times the particle pollution from gaseous fueled devices. See response to Comment #77.

Comment #79: **When are the most burn days (worst months)? Is there a pattern?**

Response: No Burn days can occur on any day from November 1st until the end of February. Usually, there are more No Burn days in December and January; but will vary year to year depending on weather patterns.

Comment #80: **You take comments on options; will these be the only options to be considered? After workshops, will the options change?**

Response: The Board can choose to take no action, consider staff's recommendation or any of the other options, or direct staff to come back at a subsequent meeting with another alternative. Staff has considered the oral and written comments received and the recommend option has been changed. The recommended option, previously referred to as Option A at the workshops, is to maintain the two-stage program but reduce the concentration thresholds for prohibiting burning to 31 $\mu\text{g}/\text{m}^3$ for Stage 1 and 35 $\mu\text{g}/\text{m}^3$ for Stage 2. Please see response to Comment #4.

Comment #81: **In regards to the emission reductions – Is the Stage 2 reduction in addition to Stage 1 reductions? The emission reduction rates would indicate that Stage 1 is more effective? Our industry has spent millions of dollars to develop cleaner burning devices. We hope you'll consider an approach that doesn't force to natural gas.**

Response: The emission reductions presented for Stage 1 and Stage 2 are not additive. The estimated overall emission reductions are 43% for Stage 1 days and 70% for Stage 2 days. Therefore, emission reductions are

higher on Stage 2 days. The emission reduction percentages take into account the compliance rates from the Aurora telephone survey as well as the fact that certified devices and pellet stove are exempt on Stage 1 days.

In terms of air quality, the Stage 1 benefit is 4 $\mu\text{g}/\text{m}^3$ and the Stage 2 benefit is 12 $\mu\text{g}/\text{m}^3$. The benefits are not cumulative, meaning the additional benefit on a Stage 2 day versus a Stage 1 day is 8 $\mu\text{g}/\text{m}^3$.

Public Workshop Chabolla Center, Galt
July 20, 2009, 6:00 pm

Attendees: RUSS WOLD, Hearth & Home Technologies
DAVE KOPP, Leisure Time Pellet Stoves
JOHN CROUCH, HBPA
DIANE AND GUY KANNENBERG VERN KLEOLM
RUSSELL OOMS FRANCIE AXTELL
TYRELL KREMER CHRIS & LAURIE AXTELL
PATTI KREMER +4 REFUSED TO SIGN

Written comments received from Russell Ooms dated July 22nd

Comment #82: **If you cannot distinguish between an open face fireplace and a pellet stove how can you possibly make a reasonable rule regarding the burning of solid fuels?**

Response: Pellet stoves are easily distinguished from fireplaces.

Comment #83: **Why were people encouraged last year to upgrade to clean burning wood stoves when this year they might not be allowed to use them?**

Response: The rule restricts wood burning on days with high PM2.5 pollution. Under the Recommended Option, which maintains the two-stage program, EPA certified devices and pellet stoves will be allowed to burn on a Stage 1 day. On a Stage 2 day, all burning will be prohibited. This is the same program that was in place last year – the difference is that we are proposing small decreases in thresholds that are used to declare No Burn days. Based on analysis of air quality data from prior years, Staff does not expect that wood burning will be restricted on every day, or even on most days. Even on days when there aren't burning restrictions, reducing PM emissions by upgrading to cleaner devices improves public health and reduces smoke impacts at the neighborhood level.

The District provides financial incentives to replace or modify fireplaces with natural gas or propane firelogs or fireplace inserts, clean burning pellet inserts, or electric fireplaces. Replacement of uncertified stoves with EPA certified, pellet, natural gas, or propane stoves is also incentivized. We do not encourage replacement of fireplaces with EPA

certified wood inserts because the emissions from the EPA certified devices are generally higher than fireplaces because they are used more frequently and for a longer duration to provide heat that would otherwise have been provided using electricity or gaseous fueled device.

Comment #84: **Why are corporate fuels, natural gas, propane, oil and coal taken off the table? Why are they protected? I know you are making this rule because the federal government lowered the air standard. Corporations buy our legislators. If I sold natural gas I would pay for a rule that took away my competition.**

Response: Natural gas and propane fueled devices emit 10 times less than even clean wood burning devices. Coal is a solid fuel, and would be prohibited from being burned on a no burn day. However, we are not aware of any data that suggests coal or oil is burned in fireplaces or stoves in Sacramento County. Additionally, the industries that supply fuels are heavily regulated to curtail the emissions from power plants and from obtaining these fuels.

Comment #85: **This rule will make criminals out of ordinary citizens. Do you believe a person will sit in a cold house on a no burn day if their only source of heat is wood?**

Response: The provisions of Rule 421 do not apply to wood or other solid fuel burning devices that are the sole source of heat in a residence. You may notify the District by completing an exemption form available on our website or by contacting the District. These exemption forms are consulted when burning is detected by a District inspector on a no burn day.

Comment #86: **Please do not let bureaucratic efficiency create an unfair rule. I know it is much easier to make a blanket rule then do all the work necessary to make a fair rule.**

Response: The District has conducted 5 public workshops and several briefings with affected industries. The District is mandated to reduce the amount of fine particulates in the air. Staff has balanced health protectiveness with the potential number of additional days that would be declared No Burn days under each option. See response to Comment #4.

Written comments received from Francie Axtell dated July 23rd

Comment #87: **The Air District is giving up to \$750 incentives for people who have open fireplaces to replace with an EPA certified device. Why would someone spend ~\$2000 to purchase a new device, when the incentive to be allowed to burn on a Stage 1 day no longer exists. Those of us who purchased an EPA certified device are now upset that Stage 1 day is proposed to no longer exist. We are being punished for doing what Air Quality Management District asked us to do.**

Response: The District does not provide financial incentives to retrofit an open fireplace with an EPA certified device. Participants are advised that the incentive program does not exempt them from mandatory burning restrictions unless natural gas, propane or electric devices are purchased. Nevertheless, after review of comments received, Staff is now recommending that the limited exemption for EPA certified devices remain in the rule. See response to Comments #4 and #16.

Oral Comments from Chabolla Center Public Workshop

Comment #88: **Please explain what a permit fee is for? What do the district's permit fees do? Aerojet pays a fee before they can test a rocket. You want people to pay to pollute? You would put surcharge on wood stoves if you could. Go after gross polluters not pellet stoves.**

Response: The District receives fees from pollution emitting sources to cover the cost of permitting and inspecting for compliance with federal, state and local rules and regulations. If Aerojet chooses to pay the fee, federal law requires districts to accept that fee to mitigate the emissions from rocket testing in lieu of providing other mitigating emission reductions. We have never considered establishing a fee on wood stoves. Rule 421 currently restricts burning in uncertified stoves and fireplaces first, on Stage 1 days, and then if the air quality gets worse, it restricts EPA certified and pellet stoves as well.

Comment #89: **Do other counties have their own districts? And what are those other districts doing?**

Response: Yes, the state is divided into 35 air districts. Some air districts encompass many counties however each air district only has authority within their geographical region. San Joaquin Valley Unified APCD, Bay Area AQMD and South Coast AQMD have already passed wood burning restrictions. Staff is also aware of other air districts that are in preliminary discussions of wood burning restrictions.

Comment #90: **Does the rule apply to burning of corn?**

Response: Yes, Rule 421 applies to any solid fuel, including corn.

Comment #91: **On a summer day I look to Sac and see a brown cloud, but the Emissions Inventory pie chart shows wood at 49% and trucks at 8%, why?**

Response: The air quality problems in our county are different in the summer and winter seasons. Poor air quality in the summer season is due to high concentrations of ground-level ozone. Mobile sources such as trucks, buses, passenger cars, and construction equipment emit about 75% of the nitrogen oxides and volatile organic compounds that are precursors to ozone formation. In the winter season poor air quality is caused by

high concentrations of particulate matter (PM). Both types of pollution have serious health consequences. The graph below illustrates the average monthly concentration of fine PM through out the year and as can be seen, the PM levels are the highest during the winter months. The largest single source of PM emissions in the winter months comes from wood burning, and the proposed rule is the most effective control measure to reduce PM concentrations.

Comment #92: **Can you distinguish between smoke particles from here and smoke coming down the hill?**

Response: The monitors cannot identify the geographic origin of particles. However, Staff contracted Sonoma Technologies to use weather and emissions information to quantify the impact of smoke from Sacramento versus surrounding counties. The results of this study will be presented during the September 24, 2009 Board hearing.

Comment #93: **What is the statewide cost for having clean air?**

Response: The statewide costs for not meeting the health standards have been compiled. The economic impact is \$170 billion annually. Staff is not aware of data that estimates the total statewide costs for the regulations needed to meet clean air goals.

Comment #94: **Can we purchase carbon credits for burning?**

Response: The purchase of carbon credits is not an alternative to complying with the burning restrictions. In addition, the District does not currently regulate or sell carbon credits. The District's goal with this rule is to reduce regional health impacts from particulate matter. If you wish to purchase carbon credits to offset your burning you may want to contact a carbon offset market vendor.

Comment #95: **How accurate was the forecasting? What is the number of days called versus what shouldn't have been and vice versa?**

Response: Keep in mind that the forecast is a prediction of the PM2.5 concentration that would occur if a No Burn day were not called. Therefore, when a No Burn day is called, the actual concentration that occurs on that day should be lower than the forecast, which, upon first impression, makes the forecast look inaccurate. To assess the forecast accuracy, it is necessary to account for the average benefit of Stage 1 and Stage 2 days before making the comparison between forecast and observed concentrations. Taking this factor into account, last season CBYB days were correctly called 28 times out of 38 times, a forecast accuracy of 74%.

Comment #96: **What is the health standard?**

Response: The federal health standards set by EPA are 35 $\mu\text{g}/\text{m}^3$ for 24-hour PM2.5 and 15 $\mu\text{g}/\text{m}^3$ for annual average PM2.5. California has an annual PM2.5 health standard of 12 $\mu\text{g}/\text{m}^3$.

Comment #97: **Can you shift focus to removing open fireplaces?**

Response: The District's strategy to improve particulate matter air quality includes a three-pronged approach to reducing emissions from wood burning: providing financial incentives, regulating new wood burning installations, and reducing burning from existing fireplaces and wood stoves. The program to provide financial incentives to remove or replace existing fireplaces and dirty wood stoves was established in June 2006. On October 26, 2006 the Board of Directors approved Rule 417 to prohibit installing new fireplaces and dirty wood burning devices. The last prong was adopted on October 25, 2007, as Rule 421, Mandatory Episodic Curtailment of Wood and Other Solid Fuel Burning. Residents and businesses that take advantage of the financial incentives to install gaseous fuel burning devices are exempt from our wood burning regulations.

The District has addressed the installation of any new open hearth fireplaces by adopting Rule 417. Rule 417 prohibits selling, supplying, installation or transferring a new wood burning appliance unless it is an EPA Phase II certified pellet-fueled, masonry heater, or an appliance that can meet the EPA PM emission standard.

See also response to Comment #1.

Comment #98: **For those of us who live in the country on acreage, is my smoke getting to the city of Sacramento?**

Response: See response to Comment #92

Comment #99: **How close are we to achieving the standard? Would a total burn ban do it?**

Response: Attainment of the federal health standards is determined using the design value (three-year average of the 98th percentile PM2.5 concentrations). The Design Value for the District over the past three years is 52 $\mu\text{g}/\text{m}^3$ (for more information see page 5 of the Staff Report). To meet the federal health standard the Design Value must be below 35 $\mu\text{g}/\text{m}^3$, or a 33% improvement in air quality.

From the Chemical Mass Balance (CMB) analysis (see Staff Report page 7) the estimated wood smoke of the total PM2.5 as measured at the monitor was in the range of 26%. By making a crude assumption of completely eliminating wood smoke and assuming a 26% reduction of the design value, the District would need additional reductions to meet the health standard. A burn ban alone will not deliver clean air but Rule

421 combined with other federal, state, and local strategies and regulations may be sufficient. The estimated reduction from these other strategies and regulations is 4 $\mu\text{g}/\text{m}^3$. A more refined analysis will be conducted over the next three years to determine whether additional reductions are needed.

Comment #100: I agree that there are some days with bad air. But leave pellet stoves alone and go after open face fireplaces.

Response: See response to Comment #11. Because of the significant public opposition to the original staff recommendation, staff is now recommending a slightly less health protective alternative, workshop Option A, that maintains the limited exemption for EPA certified and pellet stoves.

Comment #101: It would be good to have a database of people who have registered that they have a clean burning device. You can start with the incentive program participants.

Response: Thank you for the suggestion.

Comment #102: Are there any other episodic controls required by the District?

Response: Yes. Permit conditions prohibit operation of some engines on poor air quality days. Agricultural burning is prohibited when air quality levels are forecast to exceed state or federal air quality standards.

See also response to Comment #35.

Comment #103: What is the difference between a 70% reduction on a Stage 2 No Burn day but an air quality benefit of 23% reduction in wood smoke?

Response: The Stage 2 emission reduction of wood smoke is 70%, however, wood smoke is only one part of the PM_{2.5} pollution problem on any given winter day. The 23% air quality benefit reflects the reduction in ambient PM_{2.5} concentration.

Comment #104: Do you have an estimate of fireplaces and wood stoves?

Response: Yes, that information can be found in the Emission Reductions section and in Appendix E of this Staff report.

Comment #105: Why are you forcing us to use corporations for fuel?

Response: See response to Comment #84.

Comment #106: If pellet stove is sole source of heat, what happens?

Response: That pellet stove would be exempt from Rule 421 restrictions because it is the sole source of heat. The provisions of Rule 421 do not apply to wood or other solid fuel burning devices that are the sole source of heat in a residence. You may notify the District by completing an exemption form available on our website or by contacting the District. These exemption forms are consulted when burning is detected by a District inspector on a No Burn day.

Comment #107: **What is the definition of an average winter day (referring to the emissions inventory)?**

Response: The emissions inventory is prepared by CARB using various wood burning studies. CARB estimates the average winter day emissions by dividing the total burning that occurs during the winter months (November through April) by 182.5 days. The temporal profile below is used to apportion monthly emissions.

Residential Wood Combustion Temporal Profile (%)					
Jan	Feb	Mar	Apr	May	Jun
18.2	18.2	12.7	9.1	0	0
Jul	Aug	Sep	Oct	Nov	Dec
0	0	0	9.1	14.5	18.2

Comment #108: **Does the rule apply to slash burning?**

Response: Rule 421 applies to wood and other solid fuel burning in a wood burning device or fires, such as fire pits or bonfires, so it would not typically apply to "slash" burning. The traditional definition of "slash" burning applies to forests being cut down to establish an agricultural practice. To our knowledge, this no longer occurs in California, and certainly not in Sacramento County. This type of burning is not permitted under Health and Safety Code Section 41800. If you mean "slash" burning as weed control in or around fields under cultivation, this is regulated by Rule 501, Agricultural Burning. Under that rule, the burning would not be allowed on a poor air quality day.

Comment #109: **Is fog an indication of inversion level?**

Response: Not always, fog can be present below the inversion layer when sufficient humidity is present.

Comment #110: **Wouldn't fog wash out the PM?**

Response: Fog does remove fine particles from the air through the effects of scavenging and deposition processes. A recent study¹ suggested that

¹ "Examination of the Influence of California Regional Particulate Air Quality Study Fog Episodes on Aerosol Formation and Removal" by Collett, Herckes, Chang, and Lee of Colorado State University and Pandis and Fahey of

fog may be relatively better at removing some organic carbon emissions from wood smoke, and less effective at removing polycyclic aromatic hydrocarbons, which are toxic compounds emitted from burning wood. Fog also may increase some types of secondary organic aerosol fine particles when soluble volatile organic compounds are converted to nonvolatile products that are released when fog evaporates. In addition, fog interactions with inorganic aerosol species have been more widely researched. Nighttime aqueous phase reactions occur during which the liquid water in fog combines with nitrogen oxide compounds to form nitric acid. The nitric acid then reacts with available ammonia in the air to form ammonium nitrate particulate aerosols. Ammonium nitrate is the largest source of secondary PM2.5. The science regarding the competing processes of PM2.5 production and removal continues to evolve².

Comment #111: **Board needs to consider that more people will need to burn wood with the way the economy is going to save money.**

Response: Burning wood only provides a clear cost savings if wood is obtained without any costs associated with cutting and transporting the wood. For people who use wood as their primary or supplemental heat source, there will be a shift in costs from wood to an alternate source for heat. The average cost of heating a home with a wood stove for 30 days is \$236, while the cost is \$153 for electricity and \$88 for natural gas. In the case of reported cost savings resulting from personal comfort choices and/or because supplemental sources heat main living rooms while other rooms remain cooler than the home's alternative heat source would provide, resulting in a net reduction in heat delivered. Staff cannot rely on anecdotal information to estimate community scale impacts of additional No Burn days.

Heating Device	Thermal Efficiency	Fuel Cost per mmBtu
Fireplace	7%	\$206.23
Certified Wood Stove	63%	\$22.91
Pellet Stove	76%	\$28.29
Propane Fireplace	75%	\$34.24
Natural Gas Fireplace	75%	\$14.54
Electric Fireplace	>99%	\$25.23
Gas Central Heat & Air	80%	\$13.63
Electric Central Heat & Air	100%	\$25.23
Propane Central Heat & Air	80%	\$32.10

Carnegie Mellon University, January 13, 2005.

² "The ammonium nitrate particle equivalent of NOx emissions for wintertime conditions in Central California's San Joaquin Valley" by Stockwell, Watson, Robinson, Steiner, and Sylte, Atmospheric Environment 34 (2000) 4711-4717.

Note:

1. Used as primary source of heat
2. PG&E rates for natural gas (Winter 2009)
3. SMUD rates for electricity (Winter 2009)
4. Average cost of cord of wood = \$269, average cost of pellets = \$344/ton, and Cost of propane = \$2.31/gallon

Comment #112: **Have you taken into account other PM sources and are they being regulated? Are all sources that contribute to PM being looked at for controls?**

Response: See response to Comment #35 and comment #61.

Comment #113: **What is an “average winter day”, what is the wind speed etc? Doesn’t that come into play in the pie chart? What is a “No Burn day” as far as meteorology?**

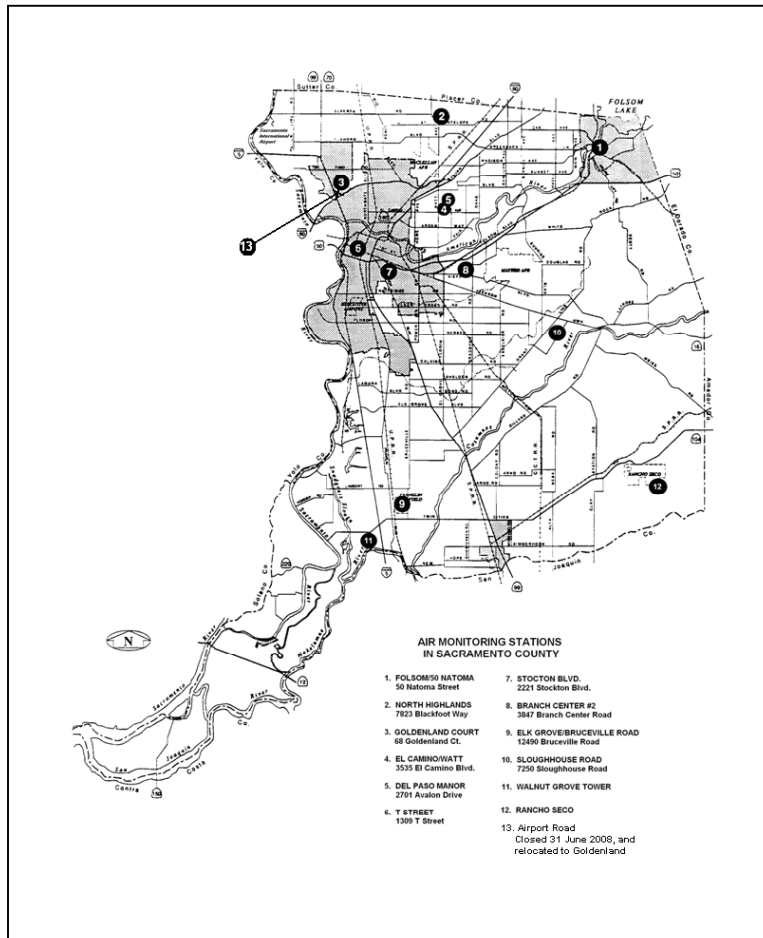
Response: The emissions inventory is not related to the weather conditions on an average winter day. See the discussion of how an average winter day inventory was prepared in response to comment #107. Weather is the most important factor to consider when making no burn forecasts. Weather conditions last season were conducive to high PM 2.5 concentrations and two extended multi-day pollution episodes occurred when an upper-level ridge of high pressure persisted over the West Coast resulting in warm aloft temperatures, limiting the vertical mixing of pollutants. And at the surface, high pressure over Nevada and the Great Basin resulted in calm-to-light winds, limiting the dispersion of pollutant.

Comment #114: **For those of us who bought clean devices and live in rural areas, why are we included?**

Response: Wood smoke and PM are a regional air pollutant and pollution from all parts of Sacramento County has an impact. There can also be local pockets of dirtier air than what is observed at the monitor. See response to Comment #92.

Comment #115: **How many air monitors does the District have and where is each located?**

Response: Sacramento County has 11 air monitoring stations, five that monitor PM2.5 concentrations. The PM2.5 monitoring stations are located in Elk Grove (Elk Grove/Bruceville Road), two locations in downtown Sacramento (UC Davis Medical Center (Stockton Blvd) and 13th and T streets (T Street)), near Del Paso Manor Elementary School (Del Paso Manor), and at Folsom City Hall (Folsom/50 Natoma). In addition, there are two monitoring sites that are only run during the winter months to monitor PM2.5; one is located at Sloughhouse and the other at Rancho Seco. A map of all the monitoring sites can be found below.



More detailed information about the air monitoring sites and the pollutants monitored can be found in the District's 2008/2009 Annual Monitoring Network Plan at the following web site:

<http://www.airquality.org/notices/other/AnnualAMNetworkPlan20082009.pdf>

You can also get additional information from CARB at the following Web site:

http://www.arb.ca.gov/qaweb/countyselect.php?c_arb_code=34

Comment #1116: **Do you have an estimate of fireplace & clean burning devices? I don't like to have to pay some corporation to heat my house. Doesn't seem fair because I don't have a certified device, but I could get one but not if I can't burn it.**

Response: Yes, there are estimates of how many wood burning and pellet devices are in Sacramento County. Please see the emission reduction section of the Staff report or Appendix E of the Staff report for detailed calculations.

Comment #117: **Who is your boss? Your boss should be my customers who bought pellet stoves. I don't appreciate workshops in July.**

Response: The District is governed by a 14-member Board of Directors composed of elected members who oversee the activities of the District. The Board is composed of all five Sacramento County Supervisors, four members of the Sacramento City Council, one member representing each of the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and one member representing the Cities of Galt and Isleton. A list of the current Board members can be found on our website: <http://www.airquality.org/bod/directors.shtml>

Workshops were held in July due to circumstances of being unable to evaluate the Check Before You Burn program until after the program ended last season. Once the analysis was completed, changes to the program must be in effect before the following season starting November 1, 2009. As such, the workshops were in July due to timelines and necessity.

Comment #118: **Go after open hearth fireplaces.**

Response: See response to Comment #97.

Comment #119: **You can't tell me a number for how clean my device needs to be for it not to be considered a polluter.**

Response: Any device that burns fuel emits some level of air pollution and would be considered a polluter. The Stage 1 exemption for certified devices and pellet devices recognizes a difference between the emission levels of certified device versus a fireplace. Natural gas or propane fueled devices are exempt from Rule 421.

Also, see response to comment #77 and Emission Reduction section in the Staff report for a comparison of the emissions levels from various devices.

Comment #120: **Last Thanksgiving had a beautiful, clean air but it was a Stage 2 No Burn day. Why?**

Response: Last year Thanksgiving Day was on the 27th of November. The forecast for that day was a Stage 2 No Burn day ($42 \mu\text{g}/\text{m}^3$). The observed concentration on that day was $30.5 \mu\text{g}/\text{m}^3$. This was one of the days that the Check Before You Burn program prevented from being over the health standards due to the reduction in wood burning.

Comment #121: **We bought what you told us to buy, why are you penalizing us?**

Response: See response to Comment #87.

Comment #122: **With regard to visible smoke emissions are you saying I can burn?**

Response: See response to Comment #76.

Comment #123: **Has the Federal health standard changed?**

Response: Yes, the federal PM2.5 health standards were originally set by EPA in 1997 and updated in 2006. Rule 421 was adopted to help the Sacramento region meet the lower 2006 24-hour standard of 35 µg/m³.

Comment #124: **How many cogeneration plants are there in Sacramento County? Do they burn wood?**

Response: There are four large scale cogeneration plants and two small scale units located in Sacramento County. None of the units are permitted to burn wood.

Comment #125: **If all fireplaces were shutdown, what would the affect be?**

Response: Both Stage 1 and Stage 2 No Burn days prohibit wood burning in an open hearth fireplace. Based on Staff estimates of wood burning emissions, open hearth fireplaces on average account for about 44% of the total emissions from wood smoke however this could vary on a day to day basis. On some days this may reduce ambient concentrations below the health standard however more reductions would most likely be needed. See also response to Comment #99.

Public Workshop Folsom Community Center
July 22, 2009, 6:30 pm

Response:

Attendees: KEITH BOND, Valley Stove
JUNE LIVINGSTON, BERC
DAVE KOPP, Leisure Time Pellet Stoves
JARED KOPP, Leisure Time Pellet Stoves
KORI THUS, BCSET
ROBIN MCDONELL, A.P.S.S.
JEANNIE KENDRICK, The Stove Connection
WALLACE MORGAN, Sacramento Regional Conversation Corps
SIRGUTE MORGAN, UCD Medical Center
BOB CLINE, Duraflame
JEFF HADDEN, NPC Firewood
DARLENE BARNES DEE GARCIA
KARIM ABDELLA KARCA SWANSON
THOR LUDE GODON AND JOAN HEIDT
DICK HARPPER LISA BOURASSA
DOUG DAVIS BILL CAMERON

GLEN OTEY
LARRY IVES
DON WEBER

ROGER PLUMMER
RICHARD BLODGET
BOB PARRICK

Written comments received from Dave Kopp dated July 22nd

Comment #126: **Instead of not allowing any burning on No Burn days the District should focus on the “gross polluters” - Open face fireplaces and woodstoves that aren’t EPA approved.**

Response: See response to Comment #97.

Comment #127: **Identify the homes with masonry fireplaces by finding out who the developers are or by visual identification of chimneys. Send letters directly to the mailing addresses.**

Response: Staff estimates that there are 502,095 housing units and 155,649 fireplaces in Sacramento County. The District does not have the resources to pursue this identification process. Staff does send information about the CBYB program and clean burning practices to residences that receive violations.

Comment #128: **Rule 421 should not apply to pellet stoves and EPA certified wood stoves.**

Response: Rule 421 was adopted with an exemption from Stage 1 No Burn days for certified and pellet devices. Because of the significant public opposition to eliminating the limited exemption for EPA certified and pellet stoves operating on Stage 1 No Burn days, Staff is now recommending workshop Option A that keeps the limited exemption for those devices.

See also response to Comment #11.

Written comments received from Glen Otey dated July 23rd

Comment#129: **I was astonished to see the audience at the Folsom workshop was dominated by people from the firewood and stove business. They seemed determine to put their profits ahead of the health of the 1.4 million people in this county. The proposed change is a very modest step in making our air more breathable and I urge you to give full support when this measure reaches the Board of Supervisors. I urge you to press ahead with the proposed change, although I personally favor Option B as presented in the workshop.**

Response: Thank you for your support.

Written comments received from Anonymous dated July 22nd

Comment #130: **Call no burn hours during daylight when people are outside. After**

7 pm you can burn cleanly. Night time air is thinner so smoke dissipates quickly. I have asthma and don't walk around at night. Central heat is drying.

Response: In evening hours when an inversion is present night time air is cooler and thicker and traps in suspended particulates. This causes a significant health impact on residents and high PM 2.5 concentrations. Additionally, the hours when most people are burning are in the early morning and evening hours which exacerbates unhealthy air quality at those times. Additionally, the air monitors in Sacramento County are operating 24 hours a day and have high readings throughout the day on bad air quality days.

Comment #131: **Government tells us to conserve gas and fossil fuels – we use more gas and electricity not burning.**

Response: Comparing devices on an efficiency basis, electricity and natural gas is more efficient at heating than burning wood. In other words, fewer natural resources are utilized to produce the same heat output when using natural gas or electricity than burning wood. See also response to Comment #111 for comparison of efficiency factors of various devices.

Comment #132: **Work on cleaning up school bus emissions.**

Response: The State has adopted the On-Road Heavy Duty Diesel In-Use Regulation that requires all school buses in the state to retrofit the buses with particulate traps. This rule requirement will begin implementing in 2013 and all buses will need to meet the requirements by 2017. More information on this regulation can be found at the CARB Web site at:
<http://www.arb.ca.gov/msprog/onrdiesel/onrdiesel.htm>

In addition, there is a program to incentivize school districts to retire old buses and replace them with new cleaner buses. You can find out more about the school bus incentive program either on the District Web site at: <http://www.airquality.org/mobile/schoolbus/index.shtml> or at CARB Web site at:
<http://www.arb.ca.gov/msprog/schoolbus/schoolbus.htm>

Written comments received from Doug Davis

Comment #133: **I'd like to see a mobile phone version of the sparetheair.com Web site.**

Response: Thank you for the suggestion. The Sacramento Metropolitan Air Quality Management District is working to have a version of the Spare The Air Web site available for Blackberry's and other personal digital assistants (PDAs) in 2010.

Comment #134: **More enforcement is needed for No Burn days so that people with**

EPA certified stoves are not caught up in the No Burn days. Open burning fireplaces need to be the target. Clean burning stoves have no visible emissions. Target the source rather than those trying to help.

Response: Enforcement on Stage 1 no burn days ensures that certified devices do not emit visible smoke. Visible smoke can be emitted by EPA certified stoves that are not operated properly or use improper fuel. For comparison of relative emissions from fireplace and stoves, see response to Comment #77.

Written comments received from Karim Abdella dated July 24th

Comment #135: **Based on the information, while I rather not have any more no burn days than are currently in place, I believe that Option A should be put in place until next years season/analysis. Hopefully the Sacramento Valley will, after 3 years, experience more normal winter conditions in which Mother Nature may alleviate part of the problem. Since wood smoke is not the only element (although it appears to be the largest contributor), I suggest the board next year present ideas to minimize the problem from all other sources as well.**

Response: Thank you for your support. Because of the significant public opposition to eliminating the limited exemption for EPA certified and pellet stoves operating on Stage 1 days, Staff is now recommending workshop Option A, that keeps the limited exemption for those devices. See response to Comments #6 and #35 about efforts to control other sources of particulate.

Written comments received from Wallace & Sirgute Morgan

Comment #136: **We vote for the least intrusive change of Rule 421. Since we can not restart Rancho Seco for cheap clean electric power, we plan to use a pellet insert stove to replace our elegant wood burning insert.**

Response: See response to Comment #135. Please keep in mind that pellet stoves are prohibited from burning on all Stage 2 No Burn days because any wood burning, including pellet stoves, on very poor air quality days contributes to unhealthy air.

Oral Comments from Folsom Community Center Public Workshop

Comment #137: **Dust is transported from China and should be included in our emission inventory pie chart. I feel that 50% of South Coast Air Quality Management District (SCAQMD) PM comes from China. What is the effect on Sacramento air quality from dust from China?**

Response: Neither CARB nor any District in the state includes PM from China as an emission source in their inventory. In January 2009, SCAQMD reported that episodic Asian sand dust transport of PM10 and larger

diameter particulates has some impact on their air basin however the full impact is unknown and they are continue to study what the full impact is from air pollution traveling in the jet stream.

Comment #138: Who makes the call on the forecasting?

Response: See response to Comment #43.

Comment #139: Are there air monitors located in the county?

Response: See response to Comment #115.

Comment #140: Is one station causing all to be in nonattainment?

Response: As mentioned earlier in Comment #99, attainment is determined by design value at each air quality monitoring station. Attainment of the federal health standards is determined using the design value of each monitoring station. All monitoring stations that measure PM 2.5 concentrations must be in attainment for Sacramento to be in attainment. The design value for the PM2.5 monitoring stations in the District are listed below:

Monitoring Station	Design Value (2005-2007) $\mu\text{g}/\text{m}^3$
Del Paso Manor	52.3
Health Dept Stockton Blvd	40.7
T Street	43.0
Folsom	35
Bruceville	40

Note: Folsom and Bruceville are estimations of design value as these two stations are not federal reference monitors however they measure PM2.5 concentrations using Beta Attenuation Monitor (BAM)

Comment #141: Is the Folsom monitor located at a valid site location? How was the site location chosen?

Response: The federal government sets criteria for siting air monitoring equipment in 40 CFR 58, Appendix D: Monitoring network design requirements and 40 CFR 58, Appendix E: Probe siting requirements. The Folsom monitoring site meets these siting criteria. More information on the Folsom air monitoring site can be found in the District's 2008/2009 Annual Monitoring Network Plan that can be down loaded at: <http://www.airquality.org/notices/other/AnnualAMNetworkPlan20082009.pdf>. You can also get additional information from CARB at the following Web site: http://www.arb.ca.gov/qaweb/countyselect.php?c_arb_code=34

Comment #142: What is the elevation of the air monitoring stations?

Response: The elevations of the PM2.5 air monitoring stations for the District are:

Monitoring Site	Elevation (meters above sea level)
Elk Grove/Bruceville Rd	7
Stockton Blvd	8
T Street	5
Del Paso Manor	38
Folsom/50 Natoma	85
Sloughhouse Road	70
Rancho Seco	69

More detailed information about the air monitoring sites and the pollutants monitored can be found in the District's 2008/2009 Annual Monitoring Network Plan at the following web site:

<http://www.airquality.org/notices/other/AnnualAMNetworkPlan20082009.pdf>

You can also get additional information from CARB, including the elevation of the sites, at the following Web site:

http://www.arb.ca.gov/qaweb/countyselect.php?c_arb_code=34

Comment #143: What were the No Burn days of last season?

Response: Last season had 10 Stage 1 days and 28 Stage 2 days.

Comment #144: Is there a concern on a push back on compliance?

Response: See response to Comment #6.

Comment #145: How many violations were issued?

Response: Last season 211 violations were issued.

Comment #146: No one complies with the restrictions.

Response: See response to Comment #9 and #10.

Comment #147: No visible emissions all season will force fireplaces and uncertified devices to cleaner devices.

Response: See response to Comment #3.

Comment #148: Does it only take one air monitoring station to cause a No Burn day?

Response: Yes. Air quality forecasts are used to determine a No Burn day. The forecast is based on an ambient concentration across the county. If the threshold is anticipated to be exceeded at any location then a No Burn day is declared.

Comment #149: Are you reconsidering your position on Duraflame logs?

Response: No. Staff reported back to our Board of Directors in May 2008 regarding the use of manufactured logs such as Duraflame. As was indicated at that Board meeting, Staff, EPA, and CARB do not endorse manufactured fire logs as a cleaner burning option because:

- 1) The voluntary no burn day component was added to discourage optional burning when air quality levels are poor. Manufactured logs are burned for ambience which is considered an "optional" use. Therefore, burning manufactured logs should not be encouraged on poor air quality days.
- 2) Manufactured logs are more emissive than EPA certified wood burning devices and pellet stoves, and
- 3) There is no assurance that manufactured logs emit less than wood.

At the May 2008 Board meeting a motion was passed to allow manufactured logs to be included in the "Burn Cleanly" category of the Check Before You Burn program. The descriptor to the "Burn Cleanly" category was changed to say, "When the forecast is 25 µg/m³ or lower, the public is allowed to burn and the burning of manufactured firelogs is acceptable at this level."

Comment #150: Is Duraflame involved in a lawsuit against Bay Area Air Quality Management District (BAAQMD)?

Response: Yes, the reference for the lawsuit is *Duraflame v. Bay Area Air Quality Management District*, Superior Court of California, County of Contra Costa, Case No. MSN09-0102. For additional information Staff would suggest contacting BAAQMD or Duraflame directly.

Comment #151: Do you know of any person on their death certificate that says died from pellet/wood smoke?

Response: Epidemiological studies have shown an increase in the number of premature deaths in people with heart or lung disease on days with increased PM2.5 concentrations. PM2.5 and wood smoke are also associated with irregular heartbeat, heart attacks, thrombosis (increased blood clotting causing obstruction of blood flow), increased coughing and wheezing, aggravated asthma, permanently decreased lung function, and reduction in IQ among children exposed in vitro to high PM2.5 concentrations, and increased risk of cardiovascular and cerebrovascular events in post-menopausal women. For details of health impacts of wood smoke please see page 3 of the Staff report.

Comment #152: What about the wildfires?

Response: Rule 421 only regulates wood or other solid fuel burning in wood burning devices during the months of November through February. The emission inventory included in the staff report is the inventory for anthropogenic sources (emissions come from man-made sources).

Natural sources, such as wildfires and the biogenic emissions from vegetation, are not included in the anthropogenic inventory. CARB does estimate the emissions from these non-anthropogenic sources.

Comment #153: How many respondents in the phone study?

Response: A representative sample of 400 Sacramento County residents who owned a wood burning device either inside or outside their home. There is a 95% confidence level that the percentages to each survey question lie with a 4.9% margin of error³.

Comment #154: What do you attribute the difference between the 70% reduction to 100% compliance?

Response: Compliance is not 100% due to a percentage of people not aware of the no burn restrictions and some who choose not to comply. The 70% compliance rate was calculated by taking the total respondents of the survey, eliminating those who were not aware of wood burning restrictions, eliminating those not aware of a Stage 2 No Burn day and finally eliminating those who did not comply with all the Stage 2 No Burn days. The result was 70% of the respondents who were familiar with No Burn restrictions and the Stage 2 No Burn days choose to comply.

Comment #155: If 50% of people don't burn and 30% burn infrequently, there should not be any pollution.

Response: This highlights how much pollution is being emitted by those choosing to burn wood. The amount of pollution from wood burning has been corroborated by the Chemical Mass Balance analysis of actual air samples and the emission inventory calculations for Sacramento County.

Comment #156: Are there cities that have attained the standard with similar rule?

Response: The San Joaquin Valley attributes their attainment of the federal PM10 standard largely to the reductions from their mandatory no burn rule. They lowered their no burn day thresholds in October 2008 to achieve the 2006 PM2.5 health standards. It is too soon to tell whether that change will be successful. There are some cities that have been successful in achieving the old PM standard of 65 µg/m³ using wood burning curtailment as part of the solution.

Comment #157: I don't believe motor vehicles contribute less pollution than wood burning. Have you done a study on how much pollution is from wood burning versus how much pollution is from cars?

Response: The District did examine how much PM2.5 is coming from Wood

³ Morley Chavero, Dawn and Holobow, Naomi, "2009 Wood Burn Awareness Survey," May 2009.

burning and how much PM2.5 is coming from other sources. Wood burning is the single largest source of wintertime PM2.5 emissions. From the Chemical Mass Balance analysis (see Staff Report page 7) it was observed that wood burning is the single largest individual source of PM2.5 collected on an air quality monitoring filter in the wintertime. Both the emission inventory and the scientific analysis show that wood burning is the single largest source of PM2.5 in the wintertime.

Comment #158: What is the budget of SMAQMD?

Response: The SMAQMD budget for fiscal year 2009/2010 is \$24,217,783.

Comment #159: What is the difference in No Burn days For Option A & Option B?

Response: For the recommended change of Stage 1 at 31 $\mu\text{g}/\text{m}^3$ and Stage 2 at 35 $\mu\text{g}/\text{m}^3$ (which was Option A at the workshop), on average, there would be 28 No Burn days per season. For Option B with Stage 1 at 25 $\mu\text{g}/\text{m}^3$ and Stage 2 at 30 $\mu\text{g}/\text{m}^3$, on average, there would be 44 No Burn days per season. The difference in No Burn days is 16.

Comment #160: Do you have elevations of air monitoring stations on your web site?

Response: See response to Comment #142.

Comment #161: Del Paso Manor also seems to be a high site for ozone?

Response: Ozone is a summer time pollution issue. Del Paso Manor site violates state and federal ozone health standards. In 2008, 18 exceedances of the federal ozone standards were recorded. While the majority of ozone-forming emissions, Volatile Organic Compounds (VOCs) and Oxides of Nitrogen (NO_x), are produced in the Sacramento metropolitan area, prevailing winds usually carry these emissions from cars and other sources up into the foothills.

During this transport time, the VOCs and NO_x continuously react with the sun's ultraviolet rays to form ground-level ozone. By the time this polluted air reaches the foothills, the majority of the emissions have been converted to ozone causing the foothills to frequently have the highest ozone levels in the region.

When the wind is calm, the emissions and ozone are not transported to the foothills, but remain closer to Sacramento. However, when the wind blows from the north to the south, the highest ozone concentrations actually occur south of Sacramento in areas like Sloughouse or Jackson.

In addition, foothill communities often have higher levels of ozone air pollution late at night compared to other sites. This occurs because

ozone is depleted at night by chemical reactions with fresh NO_x emissions from cars and other mobile sources. The foothills have very few fresh NO_x emissions, and therefore the ozone isn't "consumed" overnight in this area.

Comment #162: Are there state rules on idling of trucks and buses?

Response: Yes, CARB passes airborne toxic control measures (ATCM) to restrict the release of air contaminants. The District is responsible for enforcing ATCM requirements. The ATCM that limits school bus idling and idling at or near schools to only when necessary for safety or operational concerns was effective as of July 16, 2003. For more information on the school bus idling ATCM you can see the following Web site at CARB: <http://www.arb.ca.gov/toxics/sbidling/sbidling.htm>

The ATCM that limits Diesel-Fueled Commercial Motor Vehicle Idling was effective February 1, 2005. For more information on the heavy-duty vehicle idling emission reduction program you can see the following Web site at CARB: <http://www.arb.ca.gov/msprog/truck-idling/truck-idling.htm>

Comment #163: Who determines when it is a No Burn day?

Response: See response to Comment #43.

Comment #164: When is the No Burn information published?

Response: The District releases the No Burn status for the next day each day before noon. The daily No Burn status is therefore known more than 12 hours before the start of the next day. On rare occasions there are same day changes to the No Burn day status.

Comment #165: Burning is cheaper than paying for gas or electric.

Response: See response to Comment #111.s

Comment #166: I would like to know the violations that were over the health standards by site. How many at each site? How many air monitoring sites over the health standards constitute a violation?

Response: Attainment of the federal health standards is determined using the design value of each monitoring station. A design value is a three-year average of the 98th percentile PM_{2.5} concentrations in a year at each monitoring site using a Federal Reference Method (FRM) monitor. For Sacramento County, those sites are T Street, Del Paso Manor, and Stockton Boulevard. One station's design value is sufficient for the entire region to be considered in violation of the federal health standard.

The chart below shows you how many days for each site were over the 35 µg/m³ concentration for the three FRM monitoring sites from 2004 -

2008. Since attainment is determined on the three year average of the yearly 98th percentile, each individual day exceeding the 35 µg/m³ standard is not a violation but contributes to raising the design value over the standard which is a violation. Fewer days over the standard lower the design value of the each monitor station to be in attainment.

Monitoring Site	Days over 35 µg/m ³				
	2004	2005	2006	2007	2008
T Street	10	10	14	19	5
Del Paso Manor	13	18	19	22	8
Stockton Blvd	6	11	11	19	7

Other Written Comments Received

E-mail comment received from Bill Pieper on July 3rd

Comment #167: **I bought an EPA approved fireplace insert so I could continue to burn as freely as the original Rule 421 would allow, while willingly not burning at all on the more severe bad air days. I urge you to give the existing rule 3 or 4 more years before scrapping it.**

Response: See responses to Comments #6 and #13.
 Also, see written response at the end of the comments section to Bill Pieper dated August 20, 2009 from Director Susan Peters.

E-mail comment received from Lawrence J. Hannan & Sandra R. Wolk on July 6th

Comment #168: **Has the Air Quality Board considered the use of Duraflame and other logs which pollute less than conventional wood?**

Response: See response to Comment #149

E-mail comment received from Peter Kell on July 6th

Comment #169: **What is the proposed impact to those of us who purchased EPA Phase II certified emission units in the last few years with the support of a SMAQMD voucher?**

Response: The impact to those who have purchased EPA Phase II certified emission units will be a small increase in the number of Stage 2 No Burn days when all burning is prohibited. In addition, staff has reviewed the comments received in response to the proposal presented at the workshops. After consideration of these comments, Staff is now recommending workshop Option A, that keep the limited exemption for certified and pellet stoves/inserts.

E-mail comment received from Pamela Reed on July 6th and on August 10th

Comment #170: **Since 2000, I have replaced the way I heat my home with a wood burning stove. We seldom purchase wood, we harvest it legally ourselves. I feel PG&E gas is too expensive and Air Quality is not bad in Sacramento.**

Response: Sacramento air quality is among the worst in the nation, 6th worst in the nation for Ozone and 7th worst for 24-hour Particulate Matter. The District is currently does not meet the state PM10 health standards and state or federal PM2.5 and ozone health standards.

Comment #171: **The number of No Burn days is not the few you profess. Almost all of December 2008 was under No Burn.**

Response: During December 2008 (calendar shown below), there were a total of 4 Stage 1 (orange boxes) and 5 Stage 2 (red boxes) No Burn days called. There was also 11 Burn Cleanly and 12 Burning Discouraged (yellow) days last season however those are voluntary days where we ask if you do not need to burn to choose not to burn. Voluntary days are not considered a No Burn day as the public is allowed to burn and has the choice to choose not to. Last season's weather played a significant factor in contributing to more conducive conditions for high PM concentrations. On average over the past 5 years of PM concentrations there would have been 23 No Burn days per season. Last season there was 38 No Burn days however in the 2007-2008 season there was only 8 No Burn days.

December						
Sun	Mon	Tues	Wed	Thurs	Fri	Sat
	1	2	3	4	5	6
7	8	9	10	11	12	13
14	15	16	17	18	19	20
21	22	23	24	25	26	27
28	29	30	31			

E-mail comment received from Genie Turner on July 6th

Comment #172: **I oppose the proposed new guidelines. I use my fireplace to keep my SMUD bill down.**

Response: See response to Comment #165.

E-mail comment received from Virginia Petree on July 13th

Comment #173: **I have an EPA certified insert. I feel any changed in the current rules to be overly restrictive and you should support the rule as**

written. We are over regulated as it is.

Response: See response to Comment #21.

E-mail comment received from Staci Louie on July 13th

Comment #174: **A few years ago we purchased an EPA certified wood stove. If people don't get special "privileges" for doing the right thing, why would they do it at all? No one will spend money on an EPA stove if there is no benefit. With fewer EPA stoves in homes, even your good air days will become bad air days. Please reconsider the overhaul to Rule 421 and keep the same policies in effect for EPA certified stoves.**

Response: Over time with change outs of uncertified devices to newer cleaner burning devices there would be a reduction of emissions. This is the goal of the District's financial incentive programs. Fireplaces that replace with EPA certified devices may increase emissions due to an increase in burning. However, reductions from replacements generally occur over a longer time period than needed to meet the federal health standards and to improve public health.

Staff has reviewed the comments received in response to the proposal presented at the workshops. After consideration of these comments, Staff is now recommending workshop Option A, that keep the limited exemption for certified and pellet stoves/inserts. Also, see response to comment #21 as to why we need to make a change to Rule 421 now.

E-mail comment received from Don McCormick on July 13th

Comment #175: **I object to this latest government intrusion in our region. I think the burn ban is doing little to improve air quality while ignoring major sources of air pollution by such things as diesel powered trains, planes, trucks, and buses. Nor can the district control prevailing winds blowing in pollution from outside the district boundaries. In addition, the Air District is taking this action in isolation from improving air quality regionally and is a mere blip on a much larger screen. I also see this as another government "job killer" in that more small businesses are being forced out of business. It seems to me the board staff is focusing on homeowners, knowing that they are not well organized, do not have lobby organizations, and are rarely able to defend themselves against these senseless regulations. I would like to see the district re-focus on the big picture and coordinate regionally.**

Response: See written responses at the end of the comments section to Don McCormick dated July 16, 2009 from Larry Greene and August 13, 2009 from Director Susan Peters. Also see the discussion of socioeconomic impacts discussed in this staff report.

Phone call from Helmer Felton to Director Susan Peters on July 13th

Comment #176: **He does not want more bans on wood burning for those who use it as a primary source of heating their home. Open fires are the worst pollutant. He has an insert and it really helps to keep down their heating bills. He is on fixed income.**

Response: See written response at the end of the comment section to Mr. Felton dated July 21, 2009 from Director Susan Peters.

Phone calls from Gary Hubble, John Hammond, and Chris Boswell to Director Sandy Sheedy on July 13th

Comment #177: **All three callers were in opposition to the change.**

Response: Comment noted.

Written comment received from Manual & Peggy Soliz on July 14th

Comment #178: **We are protesting the plan to curtail wood burning entirely. We use our fireplace to save a lot on our gas bill.**

Response: See response to Comment #165.

E-mail comment received from Frank Tanforan on July 14th

Comment #179: **Is the City of West Sacramento part of the SMAQMD? Is it reasonable to regulate when they are unregulated just across the river?**

Response: The City of West Sacramento is located in Yolo County which is a part of the Yolo-Solano Air Quality Management District. Even without restrictions in West Sacramento, last season our CBYB program had a very positive impact on air quality. STI is working on a transport analysis with results to be detailed in the Board report for the September 24, 2009 Board Hearing.

Comment #180: **How many No Burn days were there last season? Was Christmas Eve or Christmas day a No Burn day?**

Response: Last season there were 38 No Burn days. Neither Christmas Eve nor Christmas day was declared a No Burn day.

Comment #181: **How many people in Sacramento County has respiratory problems associated with wood burning appliance and how many households have wood burning devices?**

Response: Numerous studies have been conducted by CARB and academia on the adverse health effects of PM and wood smoke. The number of wood burning devices in Sacramento County can be found on page 13 of the Staff report.

Please see written response at end of comments section to Mr. Tanforan dated July 22, 2009 from Larry Greene see the July 22nd letter

to Mr. Tanforan at the end of the comments section.

Phone calls from 5 anonymous callers to Director Sandy Sheedy from July 14th to July 21st

Comment #182: **All five callers noted opposition to the changes.**

Response: Comments noted.

E-mail comment received from Jerrold & Laura Stubblefield on July 15th

Comment #183: **It is unfair to restrict the use of wood burning inserts/pellet stoves for the 10% of all fireplace burners (page 13 staff report). Our wood insert is the main heating element in our home and we burn when it is truly cold, not for ambiance. We have a gas heater, but choose to use it sparingly because our family makes conservation a family affair. Despite our conservation, our Natural Gas bill average is \$ 100.00 plus/winter but only \$33.00/summer.**

Response: Wood burning inserts have the same emissions as wood stoves; the breakdown is to show inserts are less prevalent. Wood inserts and stoves (including certified and non-certified) combined emit more emissions than fireplaces.

Additionally, while certified devices and pellet stoves are designed to pollute less than fireplaces on a unit of heat basis and non-certified wood stoves, their emissions are about an order of magnitude higher than gaseous fueled devices.

Comparison of Emission Factors

Technology	PM2.5 Emission Factor (lb/mmBtu)
Certified Wood Stove (Catalytic)	1.62
Certified Wood Stove (Non-Catalytic)	1.16
Pellet Stove	0.18
Propane Fireplace	0.01
Natural Gas Fireplace	0.01
Gas Heater	0.01
Electric	None

In response to your concern on heating costs, please see response to comment #111.

Written comment received from Terri Friedman on July 15th

Comment #184: **I only use my fireplace 5-6 times a year on those few occasions when it is cold out. I feel that unless all other sources of particulate matter are also addressed, then it is unfair to target only fireplaces. I would be willing to use an inexpensive particulate trap if one is available. I would feel less put upon if all other sources of particulates were also banned on these bad air**

days.

Response: See responses to Comments #6 and #35.

E-mail comment received from Georgianna and Eric Pfost on July 15th

Comment #185: **Many of us have installed high-efficiency fireplace inserts in recent years to reduce emissions and to more efficiently heat space in our homes. Please clarify what an “EPA-certified appliance” is.**

Response: An EPA-certified appliance refers to any appliance certified by the U.S. EPA to meet performance and emissions standards set forth in Title 40 CFR, Part 60, Subpart AAA. The current standards were established in 1988 and became fully effective in 1992.

Comment #186: **To further reduce emissions, how about considering a ban or curb on gas-powered leaf blowers and lawn mowers? These tools have readily available and affordable replacements in the form of rakes, brooms, electric blowers and electric or push mowers.**

Response: The District has an annual Mown Down Air Pollution event that provides incentives for purchasing electric lawn mowers. The 13th Annual Mow Down Event occurred Saturday March, 28, 2009. This year 933 new rechargeable mowers were claimed and 34 tons of metal were recycled. The cordless rechargeable lawn mower exchange program promotes the use of electric lawnmowers, which benefits regional air quality. The emissions reduced by this year's event are estimated at 14.4 tons. Electric lawn mowers also help reduce storm water pollution and promote recycling (grass & metal). The wintertime PM 2.5 emissions of lawn mowers is under 0.02 tons per day making a ban on lawn mowers a far less effective program at reducing PM 2.5 concentrations than solid fuel burning curtailment.

E-mail comment received from Christine & Dean Boswell on July 15th

Comment #187: **Last year we installed an EPA rated wood burning stove in order to be able to have a fire and curtail our use of propane during the winter months along with ensuring that our burning does not impact air quality. Since the rule has only been in force for two years it is likely that there is insufficient data to make a determination. It is our request that the current four stage rule remain in place.**

Response: See written response at end of the comments section to Christine and Dean Boswell dated July 22, 2009 from Larry Greene.

E-mail comment received from Michael G. Peterson on July 18th

Comment #188: **I am in total agreement with the goals of reducing carbon emissions and environmental hazards but not for this draconian response to a minimal problem. Wood burning during winter months, when few people are outside is something that my family**

has done for centuries. The weather usually dissipates any perceived problems. Issues with air quality need to be concentrated with the transportation system where the majority of smog is produced. My residence has 3 fireplaces I use to heat to save money. I have 2 cords of wood that's value is \$600. I don't mind an occasional ban on burning but to make this permanent code violation would devalue my home.

Response: The weather is a contributor to the buildup of PM during episodes of No Burn days. On days when the prevailing weather includes high winds and an absence of an inversion layer burning is generally allowed.

Staff has reviewed the comments received in response to the proposal presented at the workshops. After consideration of these comments, Staff is now recommending workshop Option A, that keep the limited exemption for certified and pellet stoves/inserts. The proposed option limits burning on an average of 28 days per winter season. The benefits of this occasional ban on burning have been demonstrated to provide significant reductions of PM and health improvements. Regarding making fireplaces a code violation, although some commenters suggested a requirement to require fireplace replacements or retrofit, those requirements are not being considered at this time.

E-mail comment received from Carol Anderson on July 18th
Comment #189: **Please continue to support the rule as written.**

Response: See response to Comment #6.

Email comment received from Frank Gwerder on July 20th
Comment #190: **My family has always partially depended on wood burning as a source of heating in the winter. I do appreciate the restrictions placed in 2007, and I hope you will continue with the same regulation.**

Response: See response to Comment #6.

E-mail comment received from Jay S Wells on July 20th
Comment #191: **Residents that have EPA approved inserts or stoves should be allowed to use their investment.**

Response: See response to Comment #4.

Email comment received from John Olsen on July 21st
Comment #192: **My wife and I purchased a fireplace insert ten years ago. We are elderly and due to the obvious medical problems we have I urge the District to refrain from changing the wood burning guidelines as they exist. We have found that it is difficult for a gas fired furnace with an electric blower to efficiently remove dampness from the air within a house. School buses along with diesel**

contaminating vehicles are the most obvious polluters and there is where you should train your energy.

Response: Wood burning is the single largest source of wintertime PM in Sacramento County. Rule 421 is the most cost effective control for PM2.5 in the wintertime. Emission reductions are occurring through the replacement of school buses and heavy duty vehicles through District and state programs however they are not the most significant contributor to the wintertime pollution in Sacramento County. See also response to Comment #132.

Phone call from Derrick Kendrick to Sibyl McWalters at the City of Sacramento on July 29th

Comment #193: **He called the council to let them know that they would like to use their wood burning stove whenever needed for heat.**

Response: Comment noted.

E-mail comment received from Michael on July 22nd

Comment #194: **Many Sacramento area homes built post World War II only have a fireplace and one or possibly two wall heaters. I think there should be consideration for exempting homes built 50 years ago similar to what we do for smog checking of cars from Stage 1 requirements. They would still have to comply with Stage 2. To install central heating would cost at least \$7000. Is anyone going to compensate homeowners for these added costs?**

Response: Fireplaces are an inefficient method of heating and contribute significant to the local health impacts. The cost to heat with a fireplace is an order of magnitude more expensive than an alternative heating source. See response to Comment #165. The District's wood stove & wood fireplace change out incentive program provides incentives with the largest incentive amount for replacing a fireplace with a gas stove/insert. Additionally, the District has a low income program to replace an open hearth fireplace with an insert with no cost to the participant. For more information on the low income change out program see the following link:
<http://www.airquality.org/woodstove/assistance.shtml>

Comment #195: **What do you do with the firewood that cannot be burned? Many trees you cut down at residences are chopped into firewood. As you get more and more trees that can't be used this way, where do you propose you toss this greenery? And what is the fire potential?**

Response: Burning is not the only use for wood. Wood that is not burned can be used for a number of other purposes such as construction material for making furniture, houses artwork, paper, ground cover as wood chips and many other things. Forests are managed by US Forest Service and

are managed to minimize forest fires.

Comment #196: **Professional firewood sellers remove dead trees in national forests. If wood is not removed, it will burn in a forest fire. You will have larger forest fires with more pollution. Wood gets burned anyway, and it will be summer and not winter.**

Response: See response to Comment #195.

Comment #197: **What is the number of job losses associated with these changes?**

Response: The recommended change has a maximum potential impact to independent wood dealers of 3 job losses however this assumes that 100% of all wood purchased in Sacramento County would be purchased from independent wood dealers. The reality is some percentage less than 100% is purchased from independent wood dealers as a significant quantity of wood is purchased from retail stores. For more details see the "Socioeconomic Impact" section of the Staff report and ERG's Socioeconomic Report in Appendix G

Comment #198: **Make a requirement that any home sold after 1/1/2010 that was built before 1960 would have to meet some new requirements for their fireplaces.**

Response: See response to Comment #3.

Phone call from Susan Lima to Director Susan Peters during week of July 20th

Comment #199: **She voiced concern about expanding the ban on wood burning during the winter.**

Response: See written response at end of the comments section to Ms. Lima dated July 23, 2009 from Director Susan Peters

E-mail comment received from Gordon Linder on July 26th

Comment #200: **The May 2009 report shows that of those with wood burning devices, 83% burn in a fireplace and only 7% burn wood or pellet stoves. The report then quickly goes on to whether stoves are EPA certified not whether or not fireplaces are any kind of certified. It seems to me that based on the Staff report the biggest culprit to air quality in Sacramento County in the wintertime is Fireplaces. Why don't you go after the biggest offender and leave wood stoves and pellet stoves out of the mix altogether. Rule 421 is restrictive enough as it is; please do not penalize me anymore.**

Response: Staff's recommended change keeps the exemption for certified wood burning stoves and inserts and pellet devices. However, based on emission inventory estimates, the biggest percentage of PM2.5 emissions from wood burning is from uncertified wood stove/insert devices. Fireplaces are used less often for heating purposes than for

aesthetic purposes. For details of the emission estimates refer to Appendix E. See also response to Comment #3.

E-mail comment received from Alan Douma on July 26th

Comment #201: I am against the proposed changes. The current program is not wonderful but at least it recognizes that some stoves are more efficient than fireplaces and gives owners of these stoves some advantage. It would cost us \$15K to upgrade our old inefficient HVAC. Please consider how you can provide exceptions that are MORE than just “those with only wood source of heating”. Our stove allows us to heat a single room where we spend 90% of our time instead of 100% of home with HVAC. The additional possible reductions in particular matter are inconclusive and certainly affected more by other localities who have no such burn restrictions.

Response: See responses to Comments #4 and #6. Additionally, STI is working on a transport analysis with results to be detailed in the Board report for the September 24, 2009 Board Hearing.

E-mail comment received from Robert & Rosalie Brown on July 22nd

Comment #202: I suffer health issues due to air pollution and when people use their fireplaces and wood burning appliances my health deteriorates and I have to labor for breath as well as have burning eyes, nose, and throat. Where I reside my house fills with smoke so badly it leaves a heavy layer of particulates. But the bad air is everywhere in Rancho Cordova, so there is no escaping the problem. Please take health considerations above profits of companies. I encourage the District to make much stricter regulations than are being proposed and eliminate fireplaces and wood burning appliance use on many more additional days, because the problem affects us every day the air is filled with smoke. Too many fireplace and appliance users do not obey the no burning days and you have no way to enforce compliance for all of Sacramento. A total ban would seem a more realistic rule.

Response: Thank you for your support for air quality goals however a total ban on wood burning is not feasible due to the dramatic increase in enforcement and the possibility of compliance rates decreasing. See also response to Comment #3.

Written comment received from Bill & Debbie Thompson on July 20th

Comment #203: We would not have spent \$2,000+ for an approved stove had we known about these proposed changes especially since they come so soon. People need to be encouraged to help clean the air by giving incentives to purchase the approved stoves by being allowed to burn when others cannot. Threatening people with fines and having neighbor report on neighbor does not seem to be the best approach.

Response: See response to Comment #4.

Additional Written Comments

Phone call from Barbara Mendoza to Director Susan Peters on July 29th

Comment #204: **She has a wood burning insert and wants to have the ability to continue to burn on days that AQMD classifies as a burn day.**

Response: See written response at end of the comments section to Ms Mendoza dated July 30, 2009 from Director Susan Peters.

E-mail comment received from Steve Holl on August 3rd, 2009

Comment #205: **The staff report references a state report that estimates 0.28 cords of wood is burned annually, per household. This data is 20 years old and represents use in a rural area, where wood is inexpensive. It does not provide reasonable estimate of actual use per household statewide because costs vary by area and a lower portion in urban areas use their fireplace. The staff report provides another estimate of annual household use at 0.92 cords/year. Many recently constructed homes use gas and therefore, never burn wood. Staff did not provide data on the statistical reliability of an estimate of an annual household use of 0.92 cords per year.**

Response: The 0.92 cords per year is an estimate based on the UCB/CARB 2003 survey data specific for Sacramento⁴. This was the usage amount used in the 2007 adoption of Rule 421. CARB is in the process of updating the emission inventories for residential wood combustion. An updated cord wood usage for solid fuel burning devices is part of the CARB revised inventory methodology. For fireplaces burning for aesthetics wood usage is 0.069 cords/year per fireplace and for heating wood usage is 0.656 cords/year per fireplace. The usage factor for heating in an a fireplace was evaluated from a review of 377 fireplace source tests, 18 local wood use surveys, and several market research studies. From all of these analyses, a composite wood-burning rate, for fireplaces without inserts being used for heating was determined. The usage factor for aesthetics in a fireplace was evaluated from a review of 18 local wood use surveys, and several market research studies. From all of these analyses, a composite wood burning rate, for fireplaces without inserts being used for aesthetic purposes, was developed. These usage amounts are from Houck et al, A Recommended Procedure for Compiling Emission Inventory National, Regional and County Level Activity Data for the Residential Wood Combustion

⁴ Houck, James. 2003 "Results of Wood Burning Survey – Sacramento, San Joaquin, and San Francisco Areas, University of California Berkeley/California Air Resources Board – GIS Study"

Source Category. U.S. EPA Emission Inventory Conference, Denver, CO, 2001.

Comment #206: **EPA-approved burning devices will reduce emissions and that is why responsible citizens purchase them. The Staff fails to quantify household burning sources to identify emissions by type of wood burning device.**

Response: See response to Comment #22.

Comment #207: **The District's proposed rule changes are not based on science without supporting data and assumptions. The voluntary restrictions that were employed in 2008 were effective as there was a 57% reduction in the number of people burning during Stage 1 restriction. The Air District did not estimate that change in emissions from a Stage 1 or Stage 2 restrictions days. Any additional restrictions on household wood burning must include an analysis of the effectiveness of EPA-approved devices and how that effectiveness reduces emissions. There is no shortage of excess fuels in nearby forests or orchards. Rather than encourage citizens to use those sources of fuel, which must be disposed of anyway, in approved devices, the Air District wants to eliminate all burning.**

Response: Voluntary restrictions have been proven to be less effective than the mandatory curtailment. Both the 2007 and 2009 Aurora surveys show less awareness and less reduction of burning on voluntary days.

The emission reduction rate for a Stage 1 day, which is a mandatory No Burn day for fireplaces and uncertified wood stoves, was 57% and for Stage 2 was 70% (see Staff Report page 6). The estimation of emission reductions from a Stage 1 and Stage 2 were calculated in the emission calculation (Appendix E) and presented on page 14-15 of the Staff report.

Written Comments Received

Marc Cooley

From: Bill Pieper [bp.wcp@sbcglobal.net]

Sent: Friday, July 03, 2009 1:16 PM

To: Marc Cooley

Subject: Proposed New Burn Rules for 2009/10

Mr. Cooley: I am very unhappy to learn of the proposed new rule. I breathe in winter, and I supported the first set of rules when they were adopted. I then went out and spent over \$2,000 on an EPA approved fireplace insert so I could continue to burn as freely as that rule would allow, while willingly not burning at all on the more severe bad air days.

Have I now dumped \$2,000 down a rat hole? No fair. Since the 2007/08 winter was a phase-in period, you have only one winter to go on, 2008/09, and a drought winter at that, in suddenly deciding the rule needs to be toughened. I urge you to give the existing rule 3 or 4 more years before scrapping it, so that some sort of typical pattern can be observed, rather than a pattern based on one atypical year. When someone makes a significant investment in order to comply with a necessary rule, they should be able to rely on getting lasting benefit from that investment, not have that benefit legislated away barely a year later.

Bill Pieper
1405 El Tejon Way
Sacramento, CA 95864

Marc Cooley

From: Sandra R. Wolk [srwolk@pacbell.net]

Sent: Monday, July 06, 2009 10:40 AM

To: Marc Cooley; Marc Cooley

Subject: Rule 421

Dear Mr. Cooley,

While, naturally, we are in favor of less polluted air, our woodburning fireplace is a source of both enjoyment and warmth. As renters, we are in no position to change our fireplace to another fuel source.

Has the Air Quality Board considered the used of Duraflame and other logs which pollute less than conventional wood? We would greatly appreciate some compromise on this issue.

Thank you for your consideration,

Lawrence J. Hannan & Sandra R. Wolk

I GoodSearch & GoodShop for NorCal Aussie Rescue.
Raise money for your favorite charity or school just by searching the Internet with GoodSearch.com (powered by Yahoo), or shopping online with GoodShop.com

Marc Cooley

From: Peter Kelly [petes97@yahoo.com]

Sent: Monday, July 06, 2009 10:44 AM

To: Marc Cooley

Subject: Re: PUBLIC WORKSHOP: SACRAMENTO COUNTY FIREPLACE CURTAILMENT

What is the proposed impact to those of us who purchased EPA Phase II certified low emission units in the last few years with the support of a SMAQMD subsidy?

Peter Kelly

From: Marc Cooley <MCooley@airquality.org>

To: Marc Cooley <MCooley@airquality.org>

Sent: Monday, July 6, 2009 10:25:55 AM

Subject: PUBLIC WORKSHOP: SACRAMENTO COUNTY FIREPLACE CURTAILMENT

**PUBLIC WORKSHOP:
SACRAMENTO COUNTY FIREPLACE CURTAILMENT**

The staff of the Sacramento Metropolitan Air Quality Management District (SMAQMD) will conduct five public workshops to inform Sacramento County residents and businesses about proposed amendments to Rule 421, Mandatory Episodic Curtailment of Wood Burning Devices.

Wood burning in fireplaces and wood stoves is the largest single source of Sacramento 's wintertime air quality problems, which can cause serious health problems, including premature death. Rule 421 improves wintertime air quality by prohibiting burning wood when the concentration of fine particles in the air is predicted to exceed health standards. The proposed amendments would lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program. The recommended amendment is expected to result in 8 additional no-burn days and 4 fewer poor air quality days. We are seeking input on this recommendation and other optional thresholds.

The rule will continue to be in effect each year for the months of November, December, January, and February. Residences where wood burning is the sole source of heat or is a financial hardship are exempt from the rule. Gas logs and gas fireplaces may be used anytime.

The public is invited to attend and provide input on the proposed amendments. The schedule for the open houses is shown below.

Workshop Location	Date	Time
La Sierra Community Center , Room 800 5325 Engle Rd./5330A Gibbons Dr . , Carmichael	July 14, 2009	6:00 p.m.
Tsakopoulos Library Galleria 828 I Street, East Meeting Room, Sacramento	July 15, 2009	5:30 p.m.
SMAQMD District Office 777 12 th Street , 3 rd Floor, Sacramento	July 16, 2009	1:30 p.m.
Chabolla Center 610 Chabolla Avenue , Galt	July 20, 2009	6:00 p.m.
Folsom Community Center 52 Natoma Street, Folsom	July 22, 2009	6:30 p.m.

Copies of this notice, the rule, and the staff report will be posted on the SMAQMD website

Marc Cooley

From: Pamela Reed [p.reed_1@comcast.net]
Sent: Monday, July 06, 2009 6:06 PM
To: Marc Cooley
Subject: Re: PUBLIC WORKSHOP: SACRAMENTO COUNTY FIREPLACE CURTAILMENT

Marc,

Since the 2000 when we were held hostage by PG&E over gas for heating our homes, I replaced the way I heat my home with a wood burning stove. And I know there are many people that have done that. So PG&E has put up a hard fight to have them banned, by bringing in some radical tree huggers with scare tactics. In the 8 years that I have not heated with gas I did not spend as much money on all those gas bills as I did this year, because there were so few burn days. Now that is not enough for PG&E, they want them all. I'm appauled that under the guise of some Air Quality reasons that you are going to SELL to the public how much safer and happier they are all going to be because you saved their lives. And the reality is they will buy it. Bologna!!!!!!!!!!

I'm so sick and tired of the government controlling the lives of it's citizens. You will save no ones life, you will make no ones life better. What you will create is a source of revenue for the state. And PG&E will have their bottom line reserved on the backs of the rate payers. Oh and by the way they will be increasing their rates AGAIN!

This is the kind of thing that MAKES ME SICK, go away and leave us alone. If there were ever an agency that needed to be disbanded for the sake of our budget crisis my vote goes to you and your kind of orginazation that caters to the BIG MONEY.

Pamela Reed

----- Original Message -----

From: Marc Cooley
To: Marc Cooley
Sent: Monday, July 06, 2009 10:25 AM
Subject: PUBLIC WORKSHOP: SACRAMENTO COUNTY FIREPLACE CURTAILMENT

**PUBLIC WORKSHOP:
SACRAMENTO COUNTY FIREPLACE CURTAILMENT**

The staff of the Sacramento Metropolitan Air Quality Management District (SMAQMD) will conduct five public workshops to inform Sacramento County residents and businesses about proposed amendments to Rule 421, Mandatory Episodic Curtailment of Wood Burning Devices.

Wood burning in fireplaces and wood stoves is the largest single source of Sacramento's wintertime air quality problems, which can cause serious health problems, including premature death. Rule 421 improves wintertime air quality by prohibiting burning wood when the concentration of fine particles in the air is predicted to exceed health standards. The proposed amendments would lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program. The recommended amendment is expected to result in 8 additional no-burn days and 4 fewer poor air quality days. We are seeking input on this recommendation and other optional thresholds.

The rule will continue to be in effect each year for the months of November, December, January, and February. Residences where wood burning is the sole source of heat or is a financial hardship are exempt from the rule. Gas logs and gas fireplaces may be used anytime.

7/7/2009

Marc Cooley

From: nevergiveup68591@aol.com

Sent: Monday, July 06, 2009 6:43 PM

To: Marc Cooley

I cannot attend the meetings as I will be on vacation, out-of-state. However, I would like it on record that I oppose the proposed new guidelines. I use my fireplace to keep my SMUD bill down.

Genie Turner
Elk Grove

Stay cool with this summer's hottest movies. [Moviefone brings you trailers, celebrities, movie showtimes and tickets!](#)

Marc Cooley

From: Ginnibur [ginnibur@aol.com]

Sent: Monday, July 13, 2009 8:08 AM

To: Marc Cooley

Subject: More Regulations on Fireplace Burning

I have an EPA certified insert. It is clean burning, produces no visible smoke and has very low emissions. I feel any changes in the current rules to be overly restrictive and you should support the rule as written. We are all over regulated as it is. Give it a rest.

I have two fireplaces. One with an insert and one without. I already regulate myself to using only the one with an insert.

Virginia Petree
7236 Linda Sue Way
Citrus Heights, CA 95621

916-966-4042

Marc Cooley

From: Staci Louie [stacilouie@sbcglobal.net]

Sent: Monday, July 13, 2009 5:04 PM

To: Marc Cooley

Subject: New Wood Burning Rules

Hi Marc-

I would like to comment on the proposed changes to Rule 421- use of wood burning stoves. I would consider myself the "average" environmentalist (a person who tries to be environmentally conscious on a daily basis), so a few years ago my husband and I purchased an EPA certified wood stove (using the SMAQMD rebate program). Now, these things ARE NOT CHEAP- even with the rebate. However, we wanted to do our part to help the environment, and we saw the "writing on the wall" with changes in policy, so we spent the \$2000.00 for this special stove. We also went this route because we love a wood burning fireplace- there is just nothing nicer then a crackling warm fire on a cold winter's day. By upgrading to the EPA certified stove, we thought we got the best of both worlds- protection of the environment while keeping one of our favorite pleasures of winter.

Now I read that, after spending \$2,000 for the privilege of using this special stove, we basically just threw our \$2,000 away. If people don't get special "privileges" for doing the right thing, why would they do it at all? No one will spend the money on an EPA stove if there is no benefit. With fewer EPA stoves in homes, even your good air days will become bad air days. I don't even need to mention the economy today and how people will need to save money by burning wood (which often can be found for free or super cheap) instead of running the house heater. I absolutely understand the need for clean air, but please don't punish the people who are already trying to do the right things for the environment. Please reconsider the overhaul to Rule 421 and keep the same policies in effect for EPA certified stoves.

Sincerely-

Staci Louie

7/13/2009

ALETA KENNARD

Subject: RE: Burn Ban

-----Original Message-----

From: Jeff Starsky <StarskyJ@beutler.com>
Sent: Monday, July 13, 2009 5:35 PM
To: LARRY GREENE <LGREENE@airquality.org>
Subject: FW: Burn Ban

Larry - In the City, staff usually prepares an appropriate response to these kinds of letters. Will you have your staff prepare a response that sets forth the AQMD's position on this matter. Thanks.

Jeffrey M. Starsky, Esq.
General Counsel
Beutler Corporation
(916) 646-5715

-----Original Message-----

From: Brenn Carrigan [mailto:bcarrigan@folsom.ca.us]
Sent: Monday, July 13, 2009 1:16 PM
To: Starsky Home; Jeff Starsky
Subject: FW: Burn Ban

-----Original Message-----

From: Don McCormick [mailto:don@mgroup1.com]
Sent: Monday, July 13, 2009 11:06 AM
To: Jeff Starsky
Subject: Burn Ban

Dear Jeff:

Re: No Burn Day Restrictions

I saw the article in the Sacramento Bee (July 13, 2009, page B1) announcing the Air Quality panel's latest proposal to ban all burning on 'bad air' days and wanted to tell you that I object to this latest government intrusion in our region.

I object because I think the burn ban is doing little to improve air quality while ignoring major sources of air pollution by such things as diesel powered trains, planes, trucks, and buses. Nor can the district control prevailing winds blowing in pollution from outside the district boundaries. In addition, the Air Quality District is taking this action in isolation from improving air quality regionally and is a mere blip on a much larger screen. I also see this as another government 'job killer' in that more small businesses are being forced out of business.

It seems to me the board staff is focusing on home owners, knowing that they are not well organized, do not have lobby organizations, and are rarely able to defend themselves against these senseless regulations. I would like to see the district re-focus on the big picture and coordinate the effort regionally.

Hope you'll agree with me.

Respectfully,

--

Don McCormick
181 Water View Way
Folsom, CA. 95630
916.988.9629 (hm)

July 16, 2009

Mr. Don McCormick
181 Water View Way
Folsom, CA 95630

Dear Mr. McCormick:

Thank you for your July 13, 2009 email to Folsom Councilman Jeff Starsky concerning the Air District staff's proposed changes to the "Check Before You Burn" program. He is always interested in getting feedback from the public about air quality actions that the District is considering. He asked me to prepare this response, which I have coordinated with him.

Air quality in our area is a serious concern, and in the wintertime, the pollutant with the biggest impact on public health is tiny particles in the air, also known as PM_{2.5}. Particulate pollution is linked to serious health effects, including premature death, strokes, heart attacks, aggravated asthma, and in children, increased hospitalizations, permanent reduction in lung capacity, decreased memory function and intelligence test scores.

Pollution from mobile sources such as trains, planes, trucks, and buses is a large source of wintertime pollution, and state and federal regulations are achieving significant reductions from these sources. Nonetheless, the emission inventory for Sacramento County shows that nearly half of the PM_{2.5} emitted on an average winter day is due to smoke from burning wood. Therefore, District efforts to restrict wood burning during pollution episodes can have a large impact on improving air quality. Analysis of air quality data from the past winter season shows that the "Check Before You Burn" program reduced the number of winter days that violate the health standard by 40%.

While the "Check Before You Burn" Program has achieved significant success toward improving wintertime air quality, the current program alone is not enough. The small adjustments proposed will increase effectiveness and reduce the number of days that violate the PM_{2.5} health standard.

Wood burning restrictions on unhealthy air quality days is a cost-effective means of reducing emissions and improving air quality. In addition, it provides the highest amount of emission reductions that can be achieved through any single measure. During the development of the federally mandated attainment plan, the District will have to consider the adoption of more costly measures to reduce PM_{2.5} emissions, such as controls on: agricultural, non-agricultural, and prescribed burning; fugitive dust from bulk materials storage and handling; fugitive dust from paved roads, unpaved roads, and agricultural operations; chipping and grinding operations; and composting operations. In addition, tighter control efficiency standards for PM_{2.5} control devices (baghouses, wet scrubbers, electrostatic precipitators, etc.) may be considered. A more effective "Check Before You Burn" program will reduce the need for some of these additional measures.

Mr. Don McCormick

- 2 -

July 16, 2009

I hope I have addressed your concerns regarding proposed changes to the "Check Before You Burn" program.

Sincerely,

A handwritten signature in black ink, appearing to read "Larry Greene". The signature is written in a cursive style with a large, stylized initial "L" and "G".

Larry Greene
Executive Director/Air Pollution Control Officer

cc: Councilman Jeff Starsky, City of Folsom

July 13, 2009

RE" Wood Burning

Mr. Helmer Felton of 3920 French, 95821 does not want more bans on wood burning for those who use it as a primary source of heating their home. Open fires are the worst pollutant. He has an insert in his fireplace and it really helps to keep down their heating bills. He is on a fixed income.

Also he asks that the funding for the Sheriff not be cut. He feels safety is the most important thing for our community.

Lynn

Helmer Felton
3820 French Ave
Sacramento, 95821
CA



SACRAMENTO
METROPOLITAN

JUL 23 2009

AIR QUALITY
MANAGEMENT DISTRICT

COUNTY OF SACRAMENTO

Board of Supervisors

SUSAN PETERS

Supervisor, Third District

July 21, 2009

Mr. Hilmer Felton
3820 French Avenue
Sacramento, CA 95821

Dear Mr. Felton:

Thank you for calling my office earlier this month to express concern about expanding the ban on burning wood during the winter.

In December 2007 wood burning restrictions were imposed by the Air Quality Management District (AQMD) Board of Directors to help comply with the air standards required by the Federal Government. The AQMD board consists of all five members of the Board of Supervisors, 4 members of the Sacramento City Council, a council representative each from the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and a sole representative for the cities of Galt and Isleton.

In 2007 the AQMD staff originally wanted a total wood burning ban on certain days that would be applicable to standard open fireplaces as well as to EPA certified devices and pellet stoves. A majority of the AQMD board objected to that over-reaching approach. Instead of the total ban favored by the AQMD staff, a two-stage plan was adopted to curtail wood burning during the winter recognizing that many environmentally conscious consumers purchased EPA certified devices and pellet stoves to reduce pollution. Presently, on light pollution days residents are asked to voluntarily curtail wood burning regardless whether using a standard open fireplace or an EPA certified device – there is no mandated restriction (such an approach is like "spare the air" days) -- and on less severe pollution days homes with EPA certified devices or pellet stoves can burn but others cannot with a mandatory no-burn restriction applicable to everyone on heavy pollution days.

July 21, 2009
Page 2

AQMD staff is now proposing to lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program, which appears to be along the same approach as the original recommendation rejected in 2007. Workshops recently were held to solicit public opinion and I do not know when AQMD staff will bring the newest proposal before the AQMD Board.

Please be assured that I will take your opposition into consideration (last time I was not in favor of a single stage no-burn program). To make sure your views are noted for the record, I have taken the liberty of copying the AQMD Executive Director, Larry Greene, on this correspondence so he is made aware of your opposition and request that he notify you as to when the proposed amendment will be on the AQMD agenda.

Again, thank you for taking the time to express your concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Peters".

SUSAN PETERS
Supervisor, Third District

Cc: Larry Green

Marc Cooley

From: Schmidt, Howard [SchmidtH@saccounty.net]
Sent: Tuesday, July 14, 2009 2:09 PM
To: Frank Tanforan
Cc: LARRY GREENE
Subject: RE: More No-Burn Days

Dear Mr. Tanforan:

Supervisor Susan Peters received your email and asked me to reply on her behalf since the Board of Supervisors is in session today. After reviewing your questions, I have taken the liberty of copying Larry Greene, the Air Pollution Control Officer/Executive Director for the Sacramento Metropolitan Air Quality Management District, since he would have at his disposal specific information to address your questions. I can tell you that the City of West Sacramento falls under the jurisdiction of the Yolo/Solano Air Quality District. Accordingly, through this email on behalf of Supervisor Peters I am asking Mr. Greene to arrange for a reply to your questions along with having this office copied on the response so the information can be shared with Supervisor Peters since she serves on the AQMD Board of Directors and she told me with forwarding your email that she is equally interested in the answers to your questions. Thank you for sharing your questions with Supervisor Peters.

For your information, AQMD staff will be conducting a public workshop tonight July 14 about burning wood in fireplaces. The workshop starts at 6 pm and will be held La Sierra Community Center, Room 800, at 5325 Engle Rd./5330A Gibbons Dr. in Carmichael.

Also for more information about the AQMD, please visit its website: <http://www.airquality.org/>

Howard Schmidt
Chief of Staff to County Supervisor Susan Peters
District 3, Sacramento County
(916) 874-5471

From: Frank Tanforan [mailto:tank4an@surewest.net]
Sent: Monday, July 13, 2009 5:43 PM
To: Susan Peters
Subject: More No-Burn Days

The Sacramento Bee is reporting that the Sacramento Metropolitan Air Quality Management District is considering changing rules that limit the use of wood burning fireplaces and appliances in the winter months. I have in the past and will continue to observe the appropriate regulations that are adopted: however, several questions have come to mind.

1. Is the City of West Sacramento part of this Air Quality Management District? If not, is it reasonable to regulate the use of fireplaces, etc. in Sacramento County, when they are unregulated just across the river?
2. The Sacramento Bee reports that the board declares 23 no-burn days a season on average. How many no-burn days were there in the last season? It certainly seemed to be more than 23 last year, but maybe I am mistaken. Was Christmas eve a no-burn day or was it Christmas day?
3. How many people in the Air Quality Management District have respiratory problems associated with wood burning appliances and how many households have the fireplaces, woodstoves, pellet stoves, etc.? I will sacrifice for the greater good, but is this the case of the tail wagging the dog?

I hope your office can provide me with some help on these issues.

8/7/2009

Frank Tanforan
4500 Juno Way
Sacramento 95864

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If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

8/7/2009

July 22, 2009

Frank Tanforan
4500 Juno Way
Sacramento, CA 95864

Dear Mr. Tanforan:

Thank you for your letter concerning the District staff's proposal to make changes to the Check Before You Burn program. Public feedback such as yours is always an important part of the process when the District takes actions to improve air quality. Below are my responses to your specific questions regarding the program and the proposed changes.

In response to your first question, the City of West Sacramento is not part of our District. West Sacramento, as well as the rest of Yolo County, is part of the Yolo-Solano Air Quality Management District. That district currently has a voluntary no-burn program, and they could consider a mandatory program at some point.

We are currently undertaking a study to assess the contribution of surrounding areas to our air quality problems. Although we don't yet know the level of contribution from other areas, we do know that a large portion of the particulate pollution problem in Sacramento County is due to wood burning in our own county, where it accounts for nearly half of all particulate matter emitted on an average winter day. Even without restrictions in West Sacramento, last season our Check Before You Burn program had a very positive impact on air quality, reducing the number of days that violate the health standard by 40%.

In response to your second question, we analyzed daily particulate matter concentrations over the past 5 years to determine the average number of no-burn days that would be declared under our current program and each of our proposed options for changing the program. Last year, meteorological conditions contributed to an above average 38 no-burn days. Neither Christmas Eve nor Christmas Day was declared a no-burn day.

In response to your third question, numerous studies have been conducted by the California Air Resources Board and academia on the adverse health effects of particulate matter and wood smoke. Particulate pollution is linked to serious health effects, including premature death, strokes, heart attacks, aggravated asthma, and in children, increased hospitalizations, permanent reduction in lung capacity, decreased memory function and lower intelligence test scores.

Based on estimates for the Sacramento Metropolitan Area provided by the California Air Resources Board, because of pollution by particulate matter, each year: 330 people die prematurely; 20 people are admitted to hospitals; there are 1,200 asthma and respiratory cases and 110 acute bronchitis cases; there are 7,900 lost work days; and there are 42,000 days of restricted activity for workers. Wood smoke contributes significantly in the wintertime, when the highest concentrations occur.

Frank Tanforan

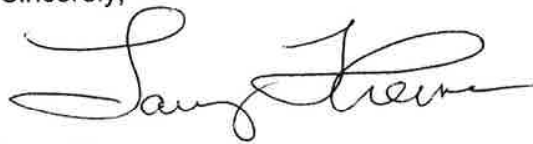
- 2 -

July 22, 2009

Based on information obtained from our surveys as well as studies conducted by others, the estimated ranges for residences in Sacramento County with wood burning devices are: 156,000 – 196,000 with fireplaces; 79,000 – 92,000 with wood stoves; 26,000 – 31,000 with wood burning inserts; and 2,000 – 15,000 with pellet stoves.

I hope I have provided satisfactory answers to your questions. Please contact me if you have additional questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Greene".

Larry Greene
Executive Director/Air Pollution Control Officer

cc: Supervisor Susan Peters, County of Sacramento

Marc Cooley

From: boswell9@frontiernet.net
Sent: Monday, July 13, 2009 11:35 AM
To: Marc Cooley
Subject: Wood burning Rules

Mr. Cooley, we have two fireplaces. Last year we installed an EPA rated wood burning stove in order to be able to have a fire and curtail our use of propane during the winter months along with ensuring that our burning does not impact the air quality. It is our understanding that the rule is up for review and it is the intent to change the rule to either burn or no burn. Since the rule has only been in force for two years it is likely that there is insufficient data to make a determination. It is our request that the current four stage rule remain in place as the rule as it stands is helping the air quality and does not need to be changed. Your serious consideration of our opinion is appreciated.

Christine and Dean Boswell
12016 Rising Road
Wilton, CA
916-687-8393

Chris and Dean

ALETA KENNARD

Subject: RE: Rules for wood burning

From: Langan, Lynn [mailto:langanly@saccounty.net]
Sent: Wednesday, July 15, 2009 8:12 AM
To: LARRY GREENE
Subject: FW: Rules for wood burning

Good morning, Mr. Greene-

Supervisor Nottoli requested this e-mail be forwarded to you for your review and response. Please keep our office updated with your findings.

Thank you.

Lynn Langan
Secretary to Board Member
Supervisor Don Nottoli's Office
700 "H" Street, Suite 2450
Sacramento, CA 95814
Phone: (916)874-5465
Fax: (916) 874-7593
langanly@saccounty.net

From: BOSWELL9 [mailto:BOSWELL9@FRONTIERNET.NET]
Sent: Monday, July 13, 2009 11:39 AM
To: Nottoli, Don
Subject: Rules for wood burning

Mr. Nottoli, we have two fireplaces. Last year we installed an EPA rated wood burning stove in order to be able to have a fire and curtail our use of propane during the winter months along with ensuring that our burning does not impact the air quality. It is our understanding that the rule is up for review and it is the intent to change the rule to either burn or no burn. Since the rule has only been in force for two years it is likely that there is insufficient data to make a determination. It is our request that the current four stage rule remain in place as the rule as it stands is helping the air quality and does not need to be changed. Your serious consideration of our opinion is appreciated.

Christine and Dean Boswell
12016 Rising Road
Wilton, CA
[916-687-8393](tel:916-687-8393)

Christine

8/13/2009

July 22, 2009

Christine and Dean Boswell
12016 Rising Road
Wilton, CA 95693-9465

Dear Mr. and Mrs. Boswell:

Thank you for your letter concerning the District staff's proposal to make changes to the Check Before You Burn program. I welcome public feedback such as yours when the District considers actions to improve air quality.

Air quality in our area is a serious concern, and in the wintertime, the pollutant with the biggest impact on public health is tiny particles in the air, also known as PM2.5. Numerous studies have been conducted by the California Air Resources Board and academia on the adverse health effects of particulate matter and wood smoke. Particulate pollution is linked to serious health effects, including premature death, strokes, heart attacks, aggravated asthma, and in children, increased hospitalizations, permanent reduction in lung capacity, decreased memory function and lower intelligence test scores.

Sacramento County does not meet the health standard for PM2.5. Because nearly half of the PM2.5 emitted in the county on an average winter day is due to smoke from burning wood, restricting wood burning on days with high pollution is the single most effective means of reducing the number of days with unhealthy air. Even though the Check Before You Burn program has only been in place since the 2007/2008 winter season, District staff and their scientific consultants have already gathered and analyzed enough data to assess the effectiveness of the program. The Stage 1 no-burn days, when all but EPA-certified devices and pellet stoves are prohibited from burning, were found to achieve a reduction of 10% in PM2.5 concentrations. Stage 2 no-burn days, when all devices are prohibited from burning, were even more effective, reducing PM2.5 concentrations by 23%. As a result, last season's Check Before You Burn program had a very positive impact on air quality, reducing the number of days that violated the health standard by 40%.

While the Check Before You Burn Program has achieved significant success toward improving wintertime air quality, the current program alone is not enough. The small adjustments proposed will increase effectiveness and reduce the number of days that violate the PM2.5 health standard. The reason these changes are being proposed now is that we hope to achieve the health standards before a federally required plan is submitted to the U.S. Environmental Protection Agency. A more effective Check Before You Burn Program will reduce the need to implement other, more costly control measures to reduce PM2.5 pollution.

The District's staff has developed three proposed options for changing the Check Before You Burn Program. Each option would increase the number of days on which wood burning would be restricted, but would also reduce the number of days that violate the health standard. The recommended option would eliminate Stage 1 no-burn days, resulting in single stage that would prohibit all wood burning on days with unhealthy air. Under this proposal, the PM2.5 threshold for calling no-burn days would also be reduced. This option is expected to result, on average, in

8 additional no-burn days over the current program and reduce the number of days that violate the health standard by 4.

The two other options being proposed retain the two-stage mandatory restrictions that you favor. Both options are similar to the current rule, but lower the PM2.5 thresholds for calling no-burn days. Option A would result, on average, in 5 additional no-burn days over the current program and reduce the number of days that violate the health standard by 3. Option B would result, on average, in 21 additional no-burn days over the current program and reduce the number of days that violate the health standard by 4.

All three options will be presented to Board of Directors for possible adoption at a public hearing. Your opinion, as well as others, will be taken into consideration when the Board takes action to make any changes to the Check Before You Burn program. The Board may decide to adopt one of the proposed options, direct the District staff to propose additional options, or may decide to make no changes to the program at all.

Please contact me if you have additional comments or questions.

Sincerely,

A handwritten signature in cursive script, appearing to read "Larry Greene".

Larry Greene
Executive Director/Air Pollution Control Officer

cc: Supervisor Don Nottoli, County of Sacramento

From: Don McCormick [mailto:don@mgroup1.com]
Sent: Monday, July 13, 2009 11:04 AM
To: Susan Peters
Subject: Burn Ban

Dear Susan:

Re: No Burn Day Restrictions

I saw the article in the Sacramento Bee (July 13, 2009, page B1) announcing the Air Quality panel's latest proposal to ban all burning on 'bad air' days and wanted to tell you that I object to this latest government intrusion in our region.

I object because I think the burn ban is doing little to improve air quality while ignoring major sources of air pollution by such things as diesel powered trains, planes, trucks, and buses. Nor can the district control prevailing winds blowing in pollution from outside the district boundaries. In addition, the Air Quality District is taking this action in isolation from improving air quality regionally and is a mere blip on a much larger screen. I also see this as another government 'job killer' in that more small businesses are being forced out of business.

It seems to me the board staff is focusing on home owners, knowing that they are not well organized, do not have lobby organizations, and are rarely able to defend themselves against these senseless regulations. I would like to see the district re-focus on the big picture and coordinate the effort regionally.

Hope you'll agree with me.

Respectfully,

Don McCormick
181 Water View Way
Folsom, CA. 95630
916.988.9629 (hm)

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Marc Cooley

From: BRIGETTE TOLLSTRUP
Sent: Friday, August 14, 2009 8:54 AM
To: ALETA KENNARD; KEVIN J. WILLIAMS; Marc Cooley
Subject: FW: Burn Ban

-----Original Message-----

From: Susan Peters [mailto:SusanPeters@saccounty.net]
Sent: Thursday, August 13, 2009 2:16 PM
To: Don McCormick
Cc: LARRY GREENE
Subject: RE: Burn Ban

Dear Don:

Thank you for your email last month expressing concern about expanding the ban on burning wood during the winter.

In December 2007 wood burning restrictions were imposed by the Air Quality Management District (AQMD) Board of Directors to help comply with the air standards required by the Federal Government. The AQMD board consists of all five members of the Board of Supervisors, 4 members of the Sacramento City Council, a council representative each from the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and a sole representative for the cities of Galt and Isleton.

In 2007 the AQMD staff originally wanted a total wood burning ban on certain days that would be applicable to standard open fireplaces as well as to EPA certified devices and pellet stoves. A majority of the AQMD board objected to that over-reaching approach. Instead of the total ban favored by the AQMD staff, a two-stage plan was adopted to curtail wood burning during the winter recognizing that many environmentally conscious consumers purchased EPA certified devices and pellet stoves to reduce pollution. Presently, on light pollution days residents are asked to voluntarily curtail wood burning regardless whether using a standard open fireplace or an EPA certified device - there is no mandated restriction (such an approach is like "spare the air" days) -- and on less severe pollution days homes with EPA certified devices or pellet stoves can burn but others cannot with a mandatory no-burn restriction applicable to everyone on heavy pollution days.

AQMD staff is now proposing to lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program, which appears to be along the same approach as the original recommendation rejected in 2007. Workshops were held to solicit public opinion (please visit the AQMD website for more information at www.airquality.org) and I do not know when AQMD staff will bring the newest proposal before the AQMD Board.

Please be assured that I will take your opposition into consideration (last time I was not in favor of a single stage no-burn program). To make sure your views are noted for the record, I have taken the liberty of copying the AQMD Executive Director, Larry Greene, on this correspondence so he is made aware of your opposition and request that he notify you as to when the proposed amendment will be on the AQMD agenda.

Again, thank you for taking the time to express your concerns.

Sincerely,

SUSAN PETERS
Supervisor, Third District

-----Original Message-----

From: Don McCormick [mailto:don@mgroup1.com]
Sent: Monday, July 13, 2009 11:04 AM
To: Susan Peters
Subject: Burn Ban

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Hope you'll agree with me.

Respectfully,

--

Don McCormick
181 Water View Way
Folsom, CA. 95630
916.988.9629 (hm)

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ALETA KENNARD

From: BRIGETTE TOLLSTRUP
Sent: Friday, August 14, 2009 8:54 AM
To: ALETA KENNARD; KEVIN J. WILLIAMS; Marc Cooley
Subject: FW: Burn Ban

-----Original Message-----

From: Susan Peters [mailto:SusanPeters@saccounty.net]
Sent: Thursday, August 13, 2009 2:16 PM
To: Don McCormick
Cc: LARRY GREENE
Subject: RE: Burn Ban

Dear Don:

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In December 2007 wood burning restrictions were imposed by the Air Quality Management District (AQMD) Board of Directors to help comply with the air standards required by the Federal Government. The AQMD board consists of all five members of the Board of Supervisors, 4 members of the Sacramento City Council, a council representative each from the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and a sole representative for the cities of Galt and Isleton.

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Please be assured that I will take your opposition into consideration (last time I was not in favor of a single stage no-burn program). To make sure your views are noted for the record, I have taken the liberty of copying the AQMD Executive Director, Larry Greene, on this correspondence so he is made aware of your opposition and request that he notify you as to when the proposed amendment will be on the AQMD agenda.

Again, thank you for taking the time to express your concerns.

Sincerely,

SUSAN PETERS
Supervisor, Third District

-----Original Message-----

SACRAMENTO METROPOLITAN



Dated July 14th



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Please take a few minutes to share your thoughts with us...we value your input!

In the space below, please provide any comments you may have regarding the proposed amendments to Rule 421: Mandatory No-Burn Restrictions. If you need more space, feel free to attach additional sheets. When you have completed the form, you may place it in the comment box provided at this Open House meeting, or you can mail it to the address listed on the reverse side. You may also submit your comments by email to mcooley@airquality.org.

SUBMIT ALL WRITTEN COMMENTS BY FRIDAY, JULY 24.

If you have any questions regarding Rule 421, please call 916-874-4800 or toll free 800-880-9025.

Great!! the
I like the
I recommend OP food.
We need cleaner
air in Sacramento

Your Name Claudia Moore
Address 5249 Whitney Ave.
City/State/Zip Code Carmichael, CA
95608

Affiliation
i.e. business
owner, resident,
etc. Resident
Phone Number (916) 488-7869
E-mail _____

4900 62nd Street
Sacramento, CA 95820
July 13, 2009



Marc Cooley
777 12 Street
Third Floor
Sacramento, CA 95814

Dear Mr. Cooley,

We are writing to protest the air district trying to curtail wood burning fireplaces. A few years back we had an EPA approved insert installed in our fireplace, we received a rebate from the Air Quality Management Board to help offset the cost of this installation.

Now there seems to be a plan to curtail wood burning entirely. We are retired senior citizens and try to economize whenever possible; using our fireplace saves us a lot on our gas bill. We do everything we can to protect the environment; we are in the process of having solar panels installed to reduce our use of electric.

Please do not allow the air district to proceed with their plan to curtail burning.

Sincerely

Handwritten signatures of Manuel and Peggy Soliz. The signature for Manuel is on the left and for Peggy is on the right.

Manuel & Peggy Soliz

AQ should:

dated
July 14

Give guidance on proper
wood storage so people
know how to burn only
clean dry wood

- Store at least 6" off floor/
ground

- Keep out of rain + fog
Suggestion Pallets, 2x6" etc
~~off~~

MPC Firewood
916-726-0855

Also Do not Scare People
By telling them they may
not be able to use their
investment in F.P.A. wood burning
Devices \$5,000+.

Marc Cooley

From: Dave Kelly [k30521@prodigy.net]

Sent: Tuesday, July 14, 2009 6:58 AM

To: Marc Cooley

Subject: New Fireplace Technology

Mr. Cooley, Regarding the proposed changes to the rules related to wood burning, the air district should be looking at new technologies like the HearthCAT Fireplace System. It has been tested by EPA and reduces the particulates in a wood burning fireplace up to 90%. You can see it on the following link:

www.clearskiesunlimited.com

Thank You !

Marc Cooley

From: ALETA KENNARD
Sent: Thursday, July 23, 2009 12:57 PM
To: Marc Cooley
Subject: FW: wood burning

From: LARRY GREENE
Sent: Thursday, July 23, 2009 12:28 PM
To: ALETA KENNARD
Subject: FW: wood burning

FYI

Larry Greene
Executive Director/APCO
Sac Metro AQMD
lgreene@airquality.org
916-874-4802

From: Susan Peters [mailto:SusanPeters@saccounty.net]
Sent: Thursday, July 23, 2009 12:00 PM
To: jerrold and laura stubblefield
Cc: LARRY GREENE
Subject: RE: wood burning

Dear Mr. and Mrs. Stubblefield:

Thank you for your email expressing concern about expanding the ban on burning wood during the winter.

In December 2007 wood burning restrictions were imposed by the Air Quality Management District (AQMD) Board of Directors to help comply with the air standards required by the Federal Government. The AQMD board consists of all five members of the Board of Supervisors, 4 members of the Sacramento City Council, a council representative each from the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and a sole representative for the cities of Galt and Isleton.

In 2007 the AQMD staff originally wanted a total wood burning ban on certain days that would be applicable to standard open fireplaces as well as to EPA certified devices and pellet stoves. A majority of the AQMD board objected to that over-reaching approach. Instead of the total ban favored by the AQMD staff, a two-stage plan was adopted to curtail wood burning during the winter recognizing that many environmentally conscious consumers purchased EPA certified devices and pellet stoves to reduce pollution. Presently, on light pollution days residents are asked to voluntarily curtail wood burning regardless whether using a standard open fireplace or an EPA certified device – there is no mandated restriction (such an approach is like "spare the air" days) -- and on less severe pollution days homes with EPA certified devices or pellet stoves can burn but others cannot with a mandatory no-burn restriction applicable to everyone on heavy pollution days.

AQMD staff is now proposing to lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program, which appears to be along the same approach as the original recommendation rejected in 2007. Workshops were held to solicit public opinion (please visit the AQMD website for more information at www.airquality.org) and I do not know when AQMD staff will bring the newest proposal before

7/23/2009

the AQMD Board.

Please be assured that I will take your opposition into consideration (last time I was not in favor of a single stage no-burn program). To make sure your views are noted for the record, I have taken the liberty of copying the AQMD Executive Director, Larry Greene, on this correspondence so he is made aware of your opposition and request that he notify you as to when the proposed amendment will be on the AQMD agenda.

Again, thank you for taking the time to express your concerns.

Sincerely,

SUSAN PETERS
Supervisor, Third District

From: jerrold and laura stubblefield [mailto:stubblefield4@sbcglobal.net]
Sent: Tuesday, July 14, 2009 2:50 PM
To: mcooley@airquality.org; Susan Peters; smaqlmd@sbcglobal.net
Subject: wood burning

Good day,

We are writing to you because we are against additional restrictions on residential fireplace burning.

We are disheartened to hear that there is a proposal for additional restrictions on residential burning during the winter months. The last time this issue was revisited, we responded by email with the suggestion of burn days similar to "spare the air" days.

We are not pleased to have had our burns days restricted, but have been compliant with the 2007 ruling, so have our friends and neighbors. We do not want additional restrictive legislation regarding "clean burning wood stoves".

It is unfair to restrict the use of wood burning inserts/pellet stoves for the 10% of all fireplace burners (page 13 staff report). We have a wood-burning insert (currently meets EPA phase 2 standards, purchased 2002) that controls the amount of air mixture to insure an "efficient burn" and there is no visible smoke when used correctly.

Our wood insert is the main heating element in our home and we burn when it is truly cold, not for ambiance. We have a gas heater, but choose to use it sparingly because our family makes conservation a family affair.

Despite our conservation, our Natural Gas bill average is \$ 100.00 plus/winter but only \$33.00/summer.

As parents to two children, we applaud your efforts to curb air pollution; however, additional restrictions is not the way.

In the Wood vs. Fossil Fuel debate, there is no clear winner.

- Wood is a sustainable fuel, but to process.
- Natural Gas requires energy (fossil fuel)

7/23/2009

- Wood does create particle pollution, but Natural Gas releases Carbon Monoxide in the atmosphere.
- Wood cost less for consumers, but profits, personnel, etc). Natural Gas is more expensive (corporate profits, personnel, etc).

Please reconsider the new law, as this will impact our family financially as we pay more for Natural Gas to heat our home.

Thank you.

Jerrold and Laura Stubblefield

4355 Virgusell Circle
Carmichael, CA 95608
916-489-5283

COUNTY OF SACRAMENTO EMAIL DISCLAIMER:

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by other than the County of Sacramento or the intended recipient is strictly prohibited.

If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.



COUNTY OF SACRAMENTO
Board of Supervisors

SUSAN PETERS
Supervisor, Third District

SACRAMENTO
METROPOLITAN
JUL 24 2009
AIR QUALITY
MANAGEMENT DISTRICT

July 23, 2009

Ms. Susan Lima
2457 Catalina Drive
Sacramento, CA 95864

Dear Ms. Lima:

Thank you for calling my office earlier this week to express concern about expanding the ban on burning wood during the winter.

In December 2007 wood burning restrictions were imposed by the Air Quality Management District (AQMD) Board of Directors to help comply with the air standards required by the Federal Government. The AQMD board consists of all five members of the Board of Supervisors, 4 members of the Sacramento City Council, a council representative each from the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and a sole representative for the cities of Galt and Isleton.

In 2007 the AQMD staff originally wanted a total wood burning ban on certain days that would be applicable to standard open fireplaces as well as to EPA certified devices and pellet stoves. A majority of the AQMD board objected to that over-reaching approach. Instead of the total ban favored by the AQMD staff, a two-stage plan was adopted to curtail wood burning during the winter recognizing that many environmentally conscious consumers purchased EPA certified devices and pellet stoves to reduce pollution. Presently, on light pollution days residents are asked to voluntarily curtail wood burning regardless whether using a standard open fireplace or an EPA certified device – there is no mandated restriction (such an approach is like "spare the air" days) -- and on less severe pollution days homes with EPA certified devices or pellet stoves can burn but others cannot with a mandatory no-burn restriction applicable to everyone on heavy pollution days.

July 23, 2009

Page 2

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Please be assured that I will take your opposition into consideration (last time I was not in favor of a single stage no-burn program). To make sure your views are noted for the record, I have taken the liberty of copying the AQMD Executive Director, Larry Greene, on this correspondence so he is made aware of your opposition and request that he notify you as to when the proposed amendment will be on the AQMD agenda.

Again, thank you for taking the time to express your concerns.

Sincerely,

A handwritten signature in black ink that reads "Susan Peters". The signature is written in a cursive, flowing style.

SUSAN PETERS
Supervisor, Third District

Cc: Larry Green



Terri Friedman
3918 Bryan Way
Carmichael, CA 95608

July 13, 2009

Sacramento Metropolitan AQMD

777 12th Street 3rd Floor

Sacramento, CA 95814

Unfortunately, I cannot attend any of the workshops about the proposed fireplace use changes regarding Rule 421. I did, however, attend the workshops prior to the initial rules implementation. As an environmentalist, medical professional, and asthma sufferer, I understand many of the issues you are trying to address, but I disagree on the necessity of tightening those regulations.

I only use my fireplace 5-6 times a year on those few occasions when it is cold out and I have time to relax and enjoy the warmth and crackling atmosphere of a real log fire (or if the electricity goes out and its our only alternative source of heat). I only burn well-seasoned wood grown on my own property. I feel that unless all other sources of particulate matter are also addressed, then it is unfair to target only fireplaces. Additionally, for the few times a year that I would use it, a fireplace insert seems out of proportion to its value. I would, however, be willing to use an inexpensive particulate trap if one is available. Also annoying is that the foggy, dreary days when I most want to use the fireplace are the same ones you are most likely to ban its use.

In addition to the pleasure and warmth from the fire in my fireplace, this is a useful way to dispose of some of the larger pieces of pruning from the trees on my lot-rather than dumping it in the trash. I even compost the small amount of wood ash that remains.

This rule seems very "Big Brother" to me by limiting my freedom. I would feel less put upon if all other sources of particulates were also banned on these bad air days. Just because it is an easy target doesn't mean that it should be the only target. Therefore, I oppose these rule changes.

Sincerely,

Terri Friedman

SACRAMENTO METROPOLITAN



Dated July 15th



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

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SUBMIT ALL WRITTEN COMMENTS BY FRIDAY, JULY 24.

If you have any questions regarding Rule 421, please call 916-874-4800 or toll free 800-880-9025.

Does not consider retired people who depend on the heat source for warmth and keeping utilities down. Also wood heat is much warmer heat for elderly people whose bodies need extra heat. EPA Stoves emit limited pollution, and meet current standards, therefore should not be eliminated as heat sources in current economy.

It seems like cities get started on these types of things and wait until they eliminate them completely. Then there is of course the expense people have gone to to install a wood burning stove. Not that you will consider this of course. Thank you for the road.

Your Name Jane Pemble
Address 2802 Kangway
City/State/Zip Code Sacto 95859

Affiliation
i.e. business
owner, resident,
etc. owner
Phone Number 916-455-3478
E-mail _____



Dated July 15th



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

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I would suggest a rule that creates a loan in place real incentives for homeowners with non EPA certified appliances ~~and~~ and open fireplaces to upgrade to cleaner technology.

A 'No visible smoke' year round rule would keep our ^{air} cleaner even on days we meet attainment and would most likely reduce the number of ~~no~~ no burn days needed to meet attainment.

Your Name	<u>Peter Ross</u>	Affiliation i.e. business owner, resident, etc.	<u>Home & Hearth Inc</u>
Address	<u>1955 Bidwell way</u>	Phone Number	<u>916 997 9604</u>
City/State/Zip Code	<u>Sac CA 95818</u>	E-mail	<u>Peter@homeandhearth.biz</u>



Dated July 15th



COMMENT FORM

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CAN YOU TELL THE DIFFERENCE AUTO VS FIRE BURNING
 NOT EVERYONE TAKES THE DAILEY PAPER TO KNOW BURN-NO BURN
 NOT EVERYONE HAS A COMPUTER
 ON BURN DAYS - SOME PEOPLE BURN GREENWOOD
 ANY REPORTS FROM LOCAL HOSPITALS ON RESIDENTS SUFFERING
 FROM SMOKE PARTICLES.
 WHAT IS FEDERAL STANDARDS
 WANT AND STATES - CITY STANDARDS
 WHAT IS SEASONED FIREWOOD? 30% MOISTURE? WHO KNOWS WHAT
 THIS IS, SEASONED ON TIME MAKES SENSE NOT 0/0

Your Name EDUARDO J SUAREZ Affiliation owner, resident,
 Address 3162 SERRA WAY Phone Number 916 456-5592
 City/State/Zip Code SAC CA 95816 7022 E-mail _____

Marc Cooley

From: md1853 [md1853@pacbell.net]
Sent: Wednesday, July 15, 2009 4:22 PM
To: Marc Cooley
Subject: Comments for Rule 421:Amendment

Hello Marc,

I attended last evening's workshop in Carmichael and have a few questions from looking over the handouts.

From the slide "Air Quality Benefits" the last bullet states 40% fewer days above federal health standards - How many days is 40% fewer? Please give actual numbers rather than percentages.

What 3 methods were used to back up these 'results'? None are listed.

And the reason the greatest benefits are in the evenings is because that's when folks are usually home from work and school and inside -it's winter, the days are short. Difficult to see this as a listed 'benefit'.

"Why amend Rule 421?" slide, 3rd bullet, please provide the data from the studies. Who did the study? How long did it last? What was actually studied, the criteria? Who participated in it? Since the 421 came into effect in November 2007, and the studies were conducted *in* 2007, how much studying actually took place? (Very little time to collect valid information.)

"Proposed Rule Changes" slide, rather than the 5-Year Average category please state actual number of days proposed to be No Burn. An average misleads the community into thinking the total is just a few days of NO BURN when it's closer to double that number. According to the chart, the proposals translate to 50, 60 or more NO BURN days.

Information provided in such a way is dishonest and a dis-service to Sacramento residents. Right next to the idea of holding these 'workshops' in July, the hottest time of year, mid-week rather than a Saturday/Sunday when more folks have time to attend, and only 2 weeks' notice instead of the customary 30 days for a heads up. Not good, Marc.

Anyway, the "Board" should keep the Rule the same for at least one more year maybe two, to get all folks (who burn) on board. More time to adjust their routines when they're thinking of burning a fire. More time to find the most efficient method they can afford for reducing particulate matter during a burn. This Rule *already works* give it time. Stop expecting so much so soon. You'll see better numbers, be patient. Tell the Board to be patient.

Sincerely,

Marilyn Dito

7/15/2009

Marc Cooley

From: G & E Pfof [dugongs@sbcglobal.net]

Sent: Wednesday, July 15, 2009 3:56 PM

To: Marc Cooley

Subject: Comments on the proposed new wood burning regulations

We are concerned that the proposed changes to the wood burning regulations be written to clearly allow for the use of high-efficiency/low emission fireplace inserts on most days (i.e., stages 1 – 3). Many of us have installed those in recent years to reduce emissions and to more efficiently heat space in our homes, but as the revised regulations are drafted, it's not clear if any or all of these are considered "EPA-certified appliances" or not. So clarification of the definitions would be necessary.

On a related note, besides your efforts to further reduce fireplace emissions, how about considering a ban or curb on gas-powered leaf blowers and lawn mowers? Those seem to create much more in the way of greenhouse gas emissions and particulates--especially the blowers which often serve little purpose but to move dust from one part of the street to another (as we observe them on a daily basis). These tools have readily available and affordable replacements in the form of rakes, brooms, electric blowers (though that still would raise particulates) and electric or push mowers, so it shouldn't be a serious hardship to curb their use.

Thank you for considering our comments. We look forward to reviewing the next draft of the regulations (if change is still proposed).

Georgianna and Eric Pfof
Sacramento

7/15/2009

Marc Cooley

From: Bill Blackburn [bill.blackburn6@gmail.com]
Sent: Thursday, July 16, 2009 4:05 PM
To: Marc Cooley
Subject: Comments on Rule 421

Dear Mr. Cooley,

I am writing in regard to the SMAQMD's "Rule 421." As a Carmichael resident, I am a supporter of Rule 421 to limit fireplace smoke in the area and strongly urge the Board to strengthen it further. While I do believe that flexibility is key to successfully implementing the regulation, such as providing some allowance of EPA certified stoves, etc., we need to do more to clear the air in the Sacramento region.

Specifically, my concerns and comments include the following:

1. It is critically important to me that my family minimize exposure, as much as practical, PM 2.5 and other toxic constituents that are generated from fireplace smoke.
2. I live in a neighborhood built in the early 1960s and many neighbors frequently burn in the winter and I know of no EPA type fireplaces in my area. As a result, the area is routinely smoky in the fall and winter.
3. Every time my natural gas heater turns on, it pulls polluted air from outside neighborhood smoke, making it impossible to keep my home smoke free.
4. Living in the twenty first century, it is painfully ironic to me that using a fireplace to heat a home or for purely "entertainment" reasons is not a 20th century or even 19th century technology. Burning wood in an uncontrolled environment is literally "cave man" technology and must be sharply limited in major metropolitan areas like Sacramento.
5. The greenhouse gases emitted from fireplaces (namely CO2 and carbon black) contributes to global climate change and continuing to ignore this imminent problem puts us all at peril.
6. In 2004 my wife was diagnosed with advanced ovarian cancer. While we don't know what caused the cancer, it seems only prudent to me to limit my family's exposure to potential carcinogens, such as those emitted from typical fireplaces. Sadly, my wife died in January 2007, which has been devastating to me, my two boys and our extended family.
7. Because I am now a single father, it is imperative for me to maintain my own health to be there for my children and therefore believe strongly that fireplace smoke must be curtailed.

Despite opposition you are no doubt receiving from many in the community, I urge you to continue to strengthen rule 421 and create a healthier environment for us all. Thank you for considering my comments and please contact me if you have any questions.

Sincerely,

Bill J. Blackburn
4841 Tono Way
Carmichael, CA 95608

7/16/2009



Dated July 16th



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Please take a few minutes to share your thoughts with us...we value your input!

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SUBMIT ALL WRITTEN COMMENTS BY FRIDAY, JULY 24.

If you have any questions regarding Rule 421, please call 916-874-4800 or toll free 800-880-9025.

I'm opposed to the proposed restrictions. In '75 the county approved the plans I proposed for a space heating system that consisted of a fireplace insert with Hydrocoil. This provided heat & hot water for my home using alternative energy sources. Now, you plan to restrict my use of this very efficient system. Why not keep the present rule in effect for another year, thereby getting better stats. You may find at that time, that more people are complying, eliminating the need for more restrictive regs. Gov't has a notorious habit of changing the rules in the middle of the game.

Your Name

Frank P. Romano

Affiliation
i.e. business
owner, resident,
etc.

resident

Address

5232 Marjorie Dr.

Phone Number

916, 359-2148

City/State/Zip Code

Carmichael, CA
95608

E-mail

fromano@winfirst.com

Dated
July 16



COMMENT FORM

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1.4 $\frac{\text{emissions}}{\text{hr}}$

^{have}
 I have EPA approved wood stove.
 I burn w/a Dutchwest Large Convection Heater w 72% Efficiency.
 Wood burning is on fire:
 *I burn with dry, seasoned wood.
 *I leave the draft open until I have a hot fire & then close the draft. My goal is always to have little or no smoke.
 Keep the Current Rule 421.
 Thank you.
 Also, support the wood burning stove industry.

Your Name Robert Whitehead
 Address 7400 Henrietta Dr
 City/State/Zip Code Sac, CA 95822
 Affiliation owner/resident,
 i.e. business etc.
 Phone Number 421-4039
 E-mail robertwhitehead@dishmail.net

I heat primarily with wood heat. Encouraging people to burn with PG+E gas is not an answer. The Air Quality Management District should educate the public on proper burning. I appreciate the AQMD's concern. Please let the Current Rule. Wood burning EPA approved are very efficient (including burns less wood). Fire places should be turned to wood stove use (educate public).

Place
Postage
Here

The AQMD needs to give exemptions to citizens with EPA approved stoves.
P.S. My stove pipe is cleaned yearly.

Sacramento Metropolitan AQMD
Attn: Marc Cooley
777 12th Street, 3rd Floor
Sacramento, CA 95814

(tape to close)



Dated July 16th



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

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If you have any questions regarding Rule 421, please call 916-874-4800 or toll free 800-880-9025.

See Comments Below:

I attended two of the workshops that were held last week in Sacramento. There seemed to be some recurring comments from the attendees regarding "visible smoke" and "new technology" implementation. As I pointed out several times during the workshops, there are other air districts that make reference to both "visible smoke" and "new technologies" in their wood burning rules. You currently have language in Rule 421 that exempts wood burning devices that "do not emit visible smoke" as shown below:

115 EXEMPTION – CERTIFIED WOOD HEATERS AND PELLET STOVES: The provisions of Section 301 shall not apply to U.S. EPA Phase II Certified wood burning heaters and pellet fueled wood burning heaters provided:

115.1 the devices do not emit visible smoke; and

115.2 a Stage 1 Mandatory Curtailment is in effect.

116 EXEMPTION – CERTIFIED WOOD HEATERS AND PELLET STOVES: The provisions of Section 302 shall not apply to U.S. EPA Phase II Certified wood burning heaters and pellet fueled wood burning heaters provided the devices do not emit visible smoke.

If you truly do use "visible smoke" to determine violations on "no-burn days, then it only makes sense to incorporate that guideline in your "no-burn rule" to apply to all wood burning devices that "do not emit visible smoke". Additionally, EPA has spent millions \$\$\$ in developing a new wood burning fireplace standard to be used by the states. You should make references to it in your Rules.

Your Name: David Kelly

Affiliation: Clear Skies Unlimited

Address: 30521 Coplasa St

Phone Number: 951-264-8725

City/State/Zip: Lake Elsinore, CA 92530

Email: k30521@prodigy.net

Two more utilities won't fund power line

DECISIONS FOLLOW PULLOUT BY SMUD

By ED FLETCHER
efletcher@sacbee.com

Following the lead of Sacramento's power provider, two other utilities said on Tuesday that they're backing away from funding a \$1.5 billion 600-mile high-voltage transmission line across Northern California.

In separate actions, municipal energy providers for Modesto and Turlock said they will not participate in the massive project.

The Sacramento Municipal Utility District, the largest of the five utilities once involved, pulled the plug two weeks ago, leaving the project in doubt. SMUD was expected to pay for 35 percent of the transmission line's cost.

The decisions by the Modesto and Turlock irrigation districts are a near-certain death blow for the project, sponsored by the Transmission Agency of Northern California - TANC - a consortium of 15 municipal power providers.

The project had been proposed to help move energy from future wind, solar and geothermal projects in Lassen County to urban areas.

TANC spokesman Brendan Wonnacott said the agency would not comment about the recent defections. Agency members will gather today for a special meeting on the project's future.

In a prepared statement, the Turlock Irrigation District said it was forced to re-evaluate after SMUD pulled out.

"Based on that analysis, staff concluded that continued participation in the project wasn't in the best interest for TID and its customers," the statement read.

SMUD spokeswoman Elisabeth Brinton said the district backed away due to regulatory and financial uncertainties - not because of public pressure against the project.

Opposition started with landowners concerned about power lines encroaching on their property, but it snowballed once city, county and

7/16/09
From Jeff Halperin
N.D.C. Firewood
TO Whom it
May Concern
At The Air
Resources
Board

ALITA
CANNARD

Before the apparent implosion of the project, Assemblywoman Lois Wolk, D-Davis, was highly critical of how the utilities had reached out to the public about the project.

"Where you put the lines and how you site it is very important," Wolk said. "This has been done in a very arrogant fashion with very little opportunity for the public to affect the decision."

Call The Bee's Ed Fletcher,
(916) 321-1269.

I Believe it
is Highly Unfair
For you to expect
The Citizens of
This Region to
Bear Additional
Burdens to Clean
up The Air in This
Region. When Large
Utilities Are Not
Willing. Jeff Halperin

5580-726-916

Marc Cooley

From: ALETA KENNARD
Sent: Friday, July 17, 2009 2:02 PM
To: Marc Cooley
Cc: KEVIN J. WILLIAMS
Subject: Phone call from Jeff Haden

I took a phone call from Jeff Haden on Thursday right before the start of the Thursday workshop:

He wanted to note some additional comments:

He feels we are uninformed/uneducated because we still have not added the dust that is transported from China in our emission inventory pie chart. He feels since SCAQMD has acknowledged that 50% of their PM comes from China, we should too.

He also wanted to point out that he had faxed me an article (Marc, the one I gave to you on Thursday) and wanted to say that if big guys could buy clean power and aren't, then why can't those who have invested in a certified device (\$5000 - \$50,000) continue to be allowed to use that device. We should be making big guys jump through hoops before we make little guys do it.

Rule 421—Fireplace, etc., burning

July 17, 2009



We strongly object to the proposed changes in Rule 421 regarding wood burning stoves, etc.

The last time the Rule changed, we spent \$2,700 to install an “approved device” to replace our efficient, but “non-approved device” so that we would be able to continue heating our home in the most efficient and cost effective manner. With furloughs and lay offs, paying higher electric bills is going to be even more difficult this winter.

Our understanding of the proposed changes to Rule 421 is that it will not matter what type of fireplace or stove a person uses, they all will either be able to burn or not burn. There will be no incentive to replace inefficient fireplaces and stoves with efficient and “approved” ones since everyone will be cut off.

We certainly would not have spent the \$2,000+ for an “approved” stove had we known about these new proposed changes—especially since they come so soon after the last change.

We sincerely hope that you will consider “un-changing” Rule 421. People need to be encouraged to help clean the air by giving incentives to purchase the “approved” stoves, etc., such as being allowed to burn when others cannot. Threatening people with fines and having neighbor report on neighbor does not seem to be the best approach.

Please let the people who have spent the extra money to try and do what is right continue to burn as in the past.

Bill & Debbie Thompson

Marc Cooley

From: Michael Peterson [mpdesign@surewest.net]
Sent: Saturday, July 18, 2009 12:24 AM
To: Marc Cooley
Subject: fireplace curtailment comments

Dear Mr. Cooley,

I am unable to attend your workshops this week but would like to make my comments to you in this format.

I am in total agreement with the goals of reducing carbon emissions and environmental hazards but not for this draconian response to, what I see as, a minimal problem. Wood burning during winter months, when few people are even outside, is something that my family has done for centuries. The weather usually dissipates any perceived problems. Issues with air quality need to be concentrated with the transportation system where the majority of smog is produced. My residence has three fireplaces that I use to heat my home during the winter to save money having been out of work for the last 1 1/2 years. I have two cords of wood that's value is almost \$600. I don't mind an occasional ban on burning but to make this a permanent code violation would devalue my home. Please consider the issues I have presented here, as I am sure that many others feel the same and will continue to protest this type of law. Enforcement will pit neighbor against neighbor, which would not be a desirable situation either.

Respectfully,

Michael G. Peterson

Marc Cooley

From: Carol Anderson [CAharrahs@frontiernet.net]

Sent: Saturday, July 18, 2009 12:58 PM

To: Marc Cooley

Please continue and support the rule as written.

Sincerely

Caroll Anderson

Marc Cooley

From: Frank Gwerder [videotechfrankg@pacbell.net]

Sent: Monday, July 20, 2009 9:08 AM

To: Marc Cooley

Subject: wood burning is sacramento county

Dear sir:

As a long time 63 year resident of Elk Grove, My family has always partially depended on wood burnig as a source of heating in the winter, I do appreciate the restrictions placed in 2007, and I hope that you will continue with the same regulation. With the glut of empty houses in the county, it would seem there will be a automatic drop in polution.

we have used a clean burning unit, which produces no visible smoke, and procuces very low emissions, and we would like to continue burning our Lopi appliance.

thank you,
Frank Gwerder
9316 Emily street
Elk Grove, california
95624

7/20/2009

Marc Cooley

From: jay@wellssweeping.com
Sent: Monday, July 20, 2009 1:19 PM
To: Marc Cooley
Subject: Re: PUBLIC WORKSHOP: SACRAMENTO COUNTY FIREPLACE CURTAILMENT

Dear Marc,

Residents that have EPA approved inserts or stoves should be allowed to use their investment. In most cases these inserts and stoves cost much more because they did meet EPA standards and burn much cleaner than open hearth fire places.

Concerned Sacramento Resident

Jay S Wells

On Mon Jul 6 10:25 , 'Marc Cooley' sent:

**PUBLIC WORKSHOP:
SACRAMENTO COUNTY FIREPLACE CURTAILMENT**

The staff of the Sacramento Metropolitan Air Quality Management District (SMAQMD) will conduct five public workshops to inform Sacramento County residents and businesses about proposed amendments to Rule 421, Mandatory Episodic Curtailment of Wood Burning Devices.

Wood burning in fireplaces and wood stoves is the largest single source of Sacramento's wintertime air quality problems, which can cause serious health problems, including premature death. Rule 421 improves wintertime air quality by prohibiting burning wood when the concentration of fine particles in the air is predicted to exceed health standards. The proposed amendments would lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program. The recommended amendment is expected to result in 8 additional no-burn days and 4 fewer poor air quality days. We are seeking input on this recommendation and other optional thresholds.

The rule will continue to be in effect each year for the months of November, December, January, and February. Residences where wood burning is the sole source of heat or is a financial hardship are exempt from the rule. Gas logs and gas fireplaces may be used anytime.

The public is invited to attend and provide input on the proposed amendments. The schedule for the open houses is shown below.

Workshop Location	Date	Time
La Sierra Community Center, Room 800 5325 Engle Rd./5330A Gibbons Dr., Carmichael	July 14, 2009	6:00 p.m.
Tsakopoulos Library Galleria 828 I Street, East Meeting Room, Sacramento	July 15, 2009	5:30 p.m.
SMAQMD District Office 777 12 th Street, 3 rd Floor, Sacramento	July 16, 2009	1:30 p.m.
Chabolla Center 610 Chabolla Avenue, Galt	July 20, 2009	6:00 p.m.

Marc Cooley

From: Tyson Sheedy [TSheedy@cityofsacramento.org]
Sent: Tuesday, July 21, 2009 3:57 PM
To: Marc Cooley
Subject: Fwd: Comments

Attachments: Comments



Comments

HI, Marc. We are receiving a number of calls about the Rule 421 Proposed Amendment. I've attached an e-mail regarding a call that came to the Mayor/Council Offices front desk. Here are the other phone calls that I've received. All calls are in opposition to the changes.

- 1) 7/13 - Gary Hubble - 416-2505
- 2) 7/13 - John Hammond - 997-3358
- 3) 7/13 - Chris Boswell - 687-8393
- 4) 7/14 - Anonymous
- 5) 7/16 - No name - (530) 676-4446
- 6) 7/20 - Anonymous
- 7) 7/21 - Anonymous
- 8) 7/21 - Anonymous

Tyson Sheedy
Executive Assistant
City Council - District 2
(916) 808-7002
(916) 264-7680 (fax)

Marc Cooley

From: Sibyl McWalters [SMcWalters@cityofsacramento.org]

Sent: Tuesday, July 21, 2009 2:56 PM

To: Alisa Johnson; Adrienne Hall; Aubrie Fong; Anne Romo; Dinah Fischer; Jessica Equihua; Judy White; Kim Blackwell; Lisa Serna-Mayorga; Randi Kay Stephens; Sibyl McWalters; Terri Lyn Larsen; Tyson Sheedy

Subject: Comments

Derrick Kendricks
10261 Carfu Drive
Elk Grove, CA 95624

and his parents

Mr. Kendricks
8710 Chambary
Elk Grove, CA 95624

Called to let council know they would like to use their wood burning stove whenever needed for heat. I gave them the Elk Grove city hall number.

7/21/2009

From: John2914@aol.com [mailto:John2914@aol.com]
Sent: Tuesday, July 21, 2009 5:17 PM
To: Susan Peters
Subject: Woodburning fireplace inserts

Dear Supervisor Peters,

My wife and I purchased a "Regancy 1 2000 Gold" fireplace insert ten years ago. It is rated at 3 gms emissions with an efficiency rating of 73 percent and it cost us over 2400 dollars.

One of the reasons we purchased it is that during the winter months in the Sacramento, California area we have found over many years that it is difficult for a gas fired furnace with an electric blower to efficiently remove the dampness from the air within a house. This dampness is the cause of many respiratory problems including the common cold and pneumonia, both of which we have experienced.

We are elderly and not due to our expense of purchase but due to the obvious medical problems that we might be confronted with due to colds and pneumonia and possible death I urge you and each of your colleagues to refrain from changing the wood burning guidelines as they exist. We were concerned with the limitations placed last year but this additional limitation is an obvious affront to common sense.

Good wood burning stoves that burn efficiently should not be outlawed. School buses along with other diesel contaminating vehicles are the most obvious polluters and there is where you should train your energy.

Natural gas is the obvious solution to that problem, yet very little has been done to promote that form of energy and cost reduction. What is the holdup? It will take a certain amount of leadership. I hope you are the person you thought you were when you ran for this office. Please do not limit our ability to dry out the air in our own house. Thomas Jefferson would roll over in his grave.

John Olsen
Carmichael , Ca.

What's for dinner tonight? Find [quick and easy dinner ideas](#) for any occasion.

COUNTY OF SACRAMENTO EMAIL DISCLAIMER:

This email and any attachments thereto may contain private, confidential, and privileged material for the sole use of the intended recipient. Any review, copying, or distribution of this email (or any attachments thereto) by other than the County of Sacramento or the intended recipient is strictly prohibited.

If you are not the intended recipient, please contact the sender immediately and permanently delete the original and any copies of this email and any attachments thereto.

ALETA KENNARD

From: LARRY GREENE
Sent: Tuesday, July 21, 2009 8:58 PM
To: ALETA KENNARD
Subject: FW: Woodburning fireplace inserts

More for the files.

From: Susan Peters [mailto:SusanPeters@saccounty.net]
Sent: Tue 7/21/2009 5:53 PM
To: John2914@aol.com
Cc: LARRY GREENE
Subject: RE: Woodburning fireplace inserts

Dear Mr. Olsen:

Thank you for your email expressing concern about expanding the ban on burning wood during the winter.

In December 2007 wood burning restrictions were imposed by the Air Quality Management District (AQMD) Board of Directors to help comply with the air standards required by the Federal Government. The AQMD board consists of all five members of the Board of Supervisors, 4 members of the Sacramento City Council, a council representative each from the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and a sole representative for the cities of Galt and Isleton.

In 2007 the AQMD staff originally wanted a total wood burning ban on certain days that would be applicable to standard open fireplaces as well as to EPA certified devices and pellet stoves. A majority of the AQMD board objected to that over-reaching approach. Instead of the total ban favored by the AQMD staff, a two-stage plan was adopted to curtail wood burning during the winter recognizing that many environmentally conscious consumers purchased EPA certified devices and pellet stoves to reduce pollution. Presently, on light pollution days residents are asked to voluntarily curtail wood burning regardless whether using a standard open fireplace or an EPA certified device – there is no mandated restriction (such an approach is like "spare the air" days) -- and on less severe pollution days homes with EPA certified devices or pellet stoves can burn but others cannot with a mandatory no-burn restriction applicable to everyone on heavy pollution days.

AQMD staff is now proposing to lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program, which appears to be along the same approach as the original recommendation rejected in 2007. Workshops are being held to solicit public opinion (please visit the AQMD website for more information at www.airquality.org) and I do not know when AQMD staff will bring the newest proposal before the AQMD Board.

Please be assured that I will take your opposition into consideration (last time I was not in favor of a single stage no-burn program). To make sure your views are noted for the record, I have taken the liberty of copying the AQMD Executive Director, Larry Greene, on this correspondence so he is made aware of your opposition and request that he notify you as to when the proposed amendment will be on the AQMD agenda.

Again, thank you for taking the time to express your concerns.

Sincerely,

SUSAN PETERS
Supervisor, Third District

8/13/2009

Marc Cooley

From: Dan Sanford [dsanford@regency-fire.com]

Sent: Tuesday, July 21, 2009 9:49 AM

To: Marc Cooley

Subject: Rule 421

Hi Marc,

I appreciate the opportunity last Thursday to hear your presentation on the proposed changes to Rule 421. After the presentation, I had the opportunity to talk to Larry, Aleta and a few other staff members about the staff recommendations. As an industry representative, I believe it is very important to maintain a distinction between EPA certified products and older technology hearth products and open wood burning fireplaces. People are investing substantial amounts of money to burn wood and pellets cleanly and the public perception of "doing the right thing" is important to continue the change outs. A 2 stage no burn system is very important in maintaining the public's confidence in their investment. The federal government is doing their part to motivate people to change out to clean burning technology with the 2009/2010 tax credit, I think it is important for our state agencies to reinforce this program with a clear advantage for those who invest.

Thanks again,

Dan Sanford
Account Executive - No. CA / No. NV
Regency Fireplace Products - 30 years of Quality!
#60-860 Embarcadero Drive
West Sacramento, Ca 95605
Phone: 916-716-6285
Fax: 916-939-8087
E-mail: dsanford@regency-fire.com

7/22/2009



Dated July 22



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Please take a few minutes to share your thoughts with us...we value your input!

In the space below, please provide any comments you may have regarding the proposed amendments to Rule 421: Mandatory No-Burn Restrictions. If you need more space, feel free to attach additional sheets. When you have completed the form, you may place it in the comment box provided at this Open House meeting, or you can mail it to the address listed on the reverse side. You may also submit your comments by email to mcooley@airquality.org.

SUBMIT ALL WRITTEN COMMENTS BY FRIDAY, JULY 24.

If you have any questions regarding Rule 421, please call 916-874-4800 or toll free 800-880-9025.

Couple comments,

1. I'd like to see a mobile phone version version of the sparetheair.com website.

2. More enforcement is needed for enforcement of no burn days so that people with epa certified stoves are not caught up in the no burn days so open burn stoves need to be the target. Clean burning stoves have no visible emissions. Target the source rather than those trying to help.

Your Name

Doug Davis

Address

128 Chadwick Wy

City/State/Zip Code

Folsom CA 95630

Affiliation
i.e. business
owner, resident,
etc.

Resident

Phone Number

916-269-0196

E-mail

dp5rcfer@comcast.net



Dated July 22



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Please take a few minutes to share your thoughts with us...we value your input!

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CALL FOR NO BURN HOURS DURING DAYLIGHT - WHEN PEOPLE ARE OUTSIDE. AFTER 7 PM YOU CAN BURN CLEANLY. I HAVE ASTHMA AND DO NOT WALK AROUND AT NIGHT. CENTRAL HEAT IS EXTREMELY DRYING & CAUSES ME TO HAVE BRONCHITIS, WAKE UP SO DRY I HAVE DIFFICULTY BREATHING. → NIGHT TIME THE AIR IS THINNER & THE SMOKE DISAPATES QUICKLY.

THE GOVERNMENT WISHES TO CONSERVE GAS & ~~POSSIBLE~~ FOSSIL FUELS - WE USE MORE GAS & ELECTRICITY NOT BURNING.

MY SON CANNOT AFFORD JOB & GAS BILLS, THERE ARE MANY MORE AS WELL. IT IS MY MAIN SOURCE OF HEAT, TRY CLEANING UP SCHOOLS BUS EMISSIONS.

ARE YOU GOING TO SUPPLEMENT OUR HOUSEHOLDS WHERE THERE IS UNEMPLOYMENT & PAY CUTS?

Your Name _____
 Address _____
 City/State/Zip Code _____

Affiliation
 i.e. business
 owner, resident,
 etc. _____

Phone Number _____

E-mail _____



COMMENT FORM

No-Burn Res^t

in Sacramento County

Dated July 22

the proposed amendments to Rule 421: additional sheets. When you have completed the printing, or you can mail it to the address listed on airquality.org.

FRIDAY, JULY 24.

Free 800-880-9025.

wife thanks you and your team
for the excellent presentation. We vote for the
least intrusive change Rule 421.

Since we can not restart Rancho Seco for cheap
clean electric power, we plan to use a pellet insert
stove to replace our elegant wood burning insert.

It would be interesting to see European statistics
on their widely accepted use of pellet stoves. Perhaps
we could learn something of value to economic, healthy
heating of our homes.

Your Name

Wallace & Sigrute Morgan

Address

Rancho Cordova, CA 95670

City/Zip Code

Affiliation
i.e. business
owner, resident,
etc.

Sacramento Regional Conservati

Phone Number

(916) 966-7080 Corps.

E-mail



Dated July 22



COMMENT FORM

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Please take a few minutes to share your thoughts with us...we value your input!

In the space below, please provide any comments you may have regarding the proposed amendments to Rule 421: Mandatory No-Burn Restrictions. If you need more space, feel free to attach additional sheets. When you have completed the form, you may place it in the comment box provided at this Open House meeting, or you can mail it to the address listed on the reverse side. You may also submit your comments by email to mcooley@airquality.org.

SUBMIT ALL WRITTEN COMMENTS BY FRIDAY, JULY 24.

If you have any questions regarding Rule 421, please call 916-874-4800 or toll free 800-880-9025.

Instead of not allowing any burning on No-Burn Days, you should focus on the "gross polluters" - open face fireplaces + woodstoves that aren't EPA approved.

Identify the homes with masonry fire places by finding out who the developers are - or by visual identification of chimneys. Send letters directly to the mailing addresses.

Or use TV ads to get people to call in - if they can upgrade to an EPA appliance.

Also - the incentive program puts the burden on the business → over

Your Name

Dave Kapp

Address

8687 River Rd

City/State/Zip Code

Sacto, CA 95833

Affiliation
i.e. business
owner, resident,
etc.

Phone Number

916) 665-2466

E-mail

from front

Businesses don't have the time or budget to do the paperwork required or to dispose of the stoves.

Also, I don't see the justification for the Air District to come to my business and look through my books. I don't know what they are looking for.

The names of the dealers listed on the poster don't necessarily support the rule change - in fact, most of them don't.

Rule 421 should not apply to pellet stoves + wood stoves that meet EPA compliance.

(Fold in half to mail your comments)

Place
Postage
Here

Sacramento Metropolitan AQMD
Attn: Marc Cooley
777 12th Street, 3rd Floor
Sacramento, CA 95814

(tape to close)

Marc Cooley

From: Russell Ooms [russellooms@frontiernet.net]

Sent: Wednesday, July 22, 2009 11:38 PM

To: Marc Cooley

Subject: Proposed no burn days

To whom it may concern,

I attended the Galt presentation of the new rule to stop all burning on certain days. I ask you to consider the following:

1. If you cannot distinguish between an open face fireplace (80 grams per hour) and a pellet stove (.07 grams per hour) how can you possibly make a reasonable rule regarding the burning of solid fuels?

2. Why were people encouraged (money) last year to upgrade to clean burning wood stoves when this year they will not be allowed to use them?

2. Why are corporate fuels, natural gas, propane, oil, and coal, taken off the table? Why are they protected? I know you are making this rule because the federal government lowered the allowable threshold for air quality. Corporations buy our legislators and that is a known fact. If I sold natural gas I would pay for a rule that took away my competition.

3. This rule will make criminals out of ordinary citizens. Do you believe a person will sit in a cold house on a no burn day if their only source of heat is wood?

4. Please do not let bureaucratic efficiency create an unfair rule.. I know it is much easier to make a blanket rule then to do all the work necessary to make a fair rule.

Right now I can use my chainsaw and a couple bucks of gasoline and create my own heat supple for the winter months. I am a human person. Your new rule will force me to buy my fuel from corporate persons. I don't believe the intended consequence of the new federal standard was to make the air cleaner but I do believe Sacramento County air quality control people believe this.

Russell Ooms
916-776-4236

7/23/2009

Marc Cooley

From: Michael [miavo@yahoo.com]
Sent: Wednesday, July 22, 2009 10:33 AM
To: Marc Cooley
Cc: Michael S
Subject: Proposed Burning Changes

Marc

Thank you so much for returning my phone call. I was sorry that I was unable to attend the meeting last Tuesday but the information printed in the Bee was only one day prior to the first meeting in Carmichael, and I already had a meeting set for 6 pm that night.

As I discussed with you there are a few points that I believe should be considered regarding any proposed changes

1) Many homes in Sacramento were built post WW2 up to about 1960 that only had a fireplace and one or possibly two wall heaters. The fireplace was built in the home as the primary heat source for these homes during the winter. Furthermore, many of these homes have flat roofs with no attics.

I think there should be consideration for exempting homes built before 50 yrs ago similar to what we do with smogging cars. So any home built prior to 1960 (an easy number to remember) would be exempt from stage 1 requirements. They would still have to comply with Stage 2. You could go further and make a requirement that any home sold after 1/1/2010 that was built before 1960 would have to meet some new requirements for their fireplaces

The older homes also have only a flue to keep out the cold air. Imagine a one wall heater trying to warm a house. To install central heating would cost many of these occupants at least \$7000 to install. Then what do you do with a fireplace and associated heat loss? Is anyone going to compensate homeowners for these added costs and other related matters?

Given the potential cap and trade legislation this will add further cost to heat these homes.

A lot of these homes are still occupied by their original owners, many of them are veterans of WW2. Let these people have some luxury in their waning days.

What do you do with firewood that can not be burned? It only becomes a rat and black widow den of infestation.

2) What about the number of job losses associated with these changes
Tree trimmers, fireplace cleaners, firewood sellers etc. Our economy is bad enough. Many trees cut down at residences are chopped into firewood.
If you get more and more trees that can not be used for this purpose where do you propose you toss all this greenery? And what is the fire potential with this?

Also many of the professional firewood sellers remove dead trees in national forests, etc. If this wood is not removed, it eventually will be burned in a forest fire. So you just will have a larger forest fire with more pollution and the wood ends up getting burnt anyway . This will happen in the summer and not the winter.

7/22/2009

In summary, I think special dispensation should be given for older homes.- those built prior to 1960. As time passes and these homes are sold and renovated, then the time would be ripe to place tighter burning restrictions on them. And since we are talking about subdivisions for the most part, this is easy to police and monitor.

Thank you again,
Michael

7/22/2009

Marc Cooley

From: Francie Axtell [faxtell@surewest.net]
Sent: Thursday, July 23, 2009 2:18 PM
To: Marc Cooley
Subject: Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Dear Marc Cooley,

I just have two thoughts on the new proposal for the No-Burn Restrictions in Sacramento County:

- The Air Quality Management District is giving up to \$750.00 incentives for people who have open fireplaces, to replace those with an EPA certified device. Why would someone spend approximate \$2000.00 to purchase a new device, when the incentive to be allowed to burn on a Stage 1 day no longer exists.
- Those of us who did purchase an EPA certified device are now upset that the Stage 1 day no longer exists and we have now being punished for doing what the Air Quality Management District asked us to do.

It seems like the rules changed in the middle of the game.

Please take my comments into consideration when you make your recommendation the the Sacramento County Board of Supervisors.

Sincerely,

Francie Axtell

Francie Axtell
3741 Hillcrest Lane
Sacramento, CA 95821-2732
(916) 485-4464 - home
(916) 812-4311 - cell

7/23/2009

Marc Cooley

From: bgotey@comcast.net
Sent: Thursday, July 23, 2009 12:24 PM
To: Roberta MacGlashan
Cc: Marc Cooley
Subject: Wood burning restrictions

Hello Roberta,

I was astonished to see the small audience at the burning restrictions workshop in Folsom dominated by people from the firewood and stove business. They seem determined to put their profits ahead of the health of the 1.4 million people in this county. The proposed Rule 421 change is a very modest step in making our air more breathable. I urge you to give the recommended change (which would add roughly 8 more no burn days and avoid 4 exceedance days) your full support when this measure reaches the BOS (9/24, I think).

Best wishes,
Glen Otey

SACRAMENTO METROPOLITAN



mail to: SACRAMENTO Metro AQMD
attn: Marc Cooley
777 12th Street
3rd Floor
SACTO CA 95814



COMMENT FORM

dated
July 23

Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Please take a few minutes to share your thoughts with us...we value your input!

In the space below, please provide any comments you may have regarding the proposed amendments to Rule 421: Mandatory No-Burn Restrictions. If you need more space, feel free to attach additional sheets. When you have completed the form, you may place it in the comment box provided at this Open House meeting, or you can mail it to the address listed on the reverse side. You may also submit your comments by email to mcooley@airquality.org.

SUBMIT ALL WRITTEN COMMENTS BY FRIDAY, JULY 24.

If you have any questions regarding Rule 421, please call 916-874-4800 or toll free 800-880-9025.

Why not let the current 421 rules run for a couple more years to get more data? As it looks now, the first 2 years were just to get the camel's nose under the tent.

And what about all of us who got EPA approved inserts. Kind of a California gotcha. Buy these and you can heat for more days and now a proposed ban.
Double Cross

Your Name

K Middleton

Address

2948 Mission Ave

City/State/Zip Code

Carmichael CA 95608

Affiliation
i.e. business
owner, resident,
etc.

owner

Phone Number

E-mail

Marc Cooley

From: bgotey@comcast.net
Sent: Thursday, July 23, 2009 12:55 PM
To: Marc Cooley
Subject: Rule 421 Changes

To: Marc Cooley

Re: Rule 421 Amendment

I was astonished to see firewood and stove vendors dominate the workshop in Folsom. They seemed determined to put their profits ahead of the health of 1.4 million county residents. I urge you to press ahead with the proposed change, although I personally favor Option B. Most residents probably think the county has already taken care of this matter. Many would likely be surprised that wood burning is allowed anytime that there is even a slight chance of a bad air day.

Glen Otey
428 Williams St.
Folsom

Marc Cooley

From: pdmamorgan@aol.com
Sent: Friday, July 24, 2009 12:02 PM
To: Marc Cooley
Subject: Rule 421 Input

Thank you for the informative meeting in Folsom this week. Based on the information provided, while I rather not have any more no burn days that are currently in place, I believe Option A should be put in place until next years season/analysis. Hopefully by then the Sacramento Valley area will, after 3 years, experience more normal winter (rain) conditions in which mother nature may alleviate part of the problem.

My family and I enjoy the occasional wood fires we have maybe 3 or 4 times around the holidays for a few hours, and occasionally for heating on cold winter days and nights. I feel that the majority should not have to relinquish their rights, and in our instance, pleasurable family time and warmth, and have to make more sacrifices in order to secede to those who can *also* alleviate any problems a bad air day would cause them if they personally took responsibility for and other precautions themselves to minimize any risks.

Since woodsmoke is not the only element (although it appears to be the largest contributor), I suggest the board next year present ideas to minimize the problem from *all* other sources as well.

Thank you for your consideration.

Karim Abdella
(Folsom resident)

A bad credit score is 600 & below. Checking won't affect your score. [See now!](#)

7/24/2009

Marc Cooley

From: Sean Ward [sean.ward@dtiinnovations.com]

Sent: Friday, July 24, 2009 8:49 AM

To: Marc Cooley

Subject: Rule 421: Comment Form

Dear Marc,

I attended your public meeting and listened to the arguments made for and against the amendment of Rule 421. For the sake of our health and the health of our children, my family asks that you pass the amendment to Rule 421 and that you continue your work to establish standards, which will require that all chimneys be smoke-free, 365 days per year, through the creation of mandates which specify clean-burning fireplace products and technologies.

I live in midtown Sacramento with my wife and two young daughters, and the air we breathe from late September through April is full of smoke; smoke which comes from neighborhood chimneys. This air is worse than the air I breathed as a child, growing up in Los Angeles with two cigarette-smoking parents. During the colder months, our family cannot open the windows in our home to let in fresh air, because the air is not fresh – it is full of smoke. We often cannot go on evenings walks around the neighborhood, because the smoke-filled air causes our older daughter to have asthma attacks.

My mother recently installed a gas-powered chimney insert. This is a visually-appealing product, it puts out a tremendous amount of heat, and it is smoke-free. We ask you to mandate such technology, as clean-burning solutions are good for our air and our lungs, they are fair to homeowners, and they are fair to industry.

Please take immediate action to clean our air.

Sincerely,
Sean Ward
grisward@sbcglobal.net

7/24/2009

Marc Cooley

From: Gordon & Beverly Linder [gordybelin@sbcglobal.net]

Sent: Sunday, July 26, 2009 3:30 PM

To: Marc Cooley

Subject: Rule 421

It is too bad that your Final Report of May 2009 did not attempt to determine the opinion of Sacramento County residents **regarding** Rule 421. In my opinion it is mis-leading and it is paramount to "throwing the baby out with the bath water".

Of the six objectives of the report only one has any relationship to air quality; that one being the first on your list, Wood Burning Activity.

The report indicates a 95% confidence level that it represents the "true population parameters". With that being the case why don't you pay more attention to wood burning activity as indicated on page 16.

The report shows that of the people with a wood burning device in their home 83% of them burn in a fireplace and only 7% burn in "other less common devices" such as a wood or pellet stove. The report then very quickly moves on to whether or not the wood or pellet stoves are EPA certified; not whether or not the fireplaces are any kind of certified, which they are not.

It seems to me that based on the report the biggest culprit to air quality in Sacramento County in the wintertime is FIREPLACES. So why don't you go after the biggest offender and leave wood stoves and pellet stoves out of the mix altogether.

Those of us that use "stoves" use them to heat our homes not to sit in front of a fireplace for the sake of ambiance. Why do we use a wood stove to heat our homes? For those that truly use wood to heat their homes is because it is cheaper. We get the wood for nothing. If we did not, it would not be worth it; not only in dollars and cents but in labor. The wood needs to cut, split, stacked, hauled, and stored. It is lots easier to flip a thermostat.

At a time in our country when we are told to conserve energy you are being counterproductive. Hence my use of the saying, "throwing the baby (wood stoves) out with the bathwater (fireplaces).

Rule 421 is restrictive enough as it is; please do not penalize me anymore.

Gordon Linder
8010 Citron Ct.
Antelope, CA 95843

7/27/2009

Marc Cooley

From: Alan Douma [doumaa@sbcglobal.net]
Sent: Sunday, July 26, 2009 10:30 AM
To: Marc Cooley
Cc: macglashanr@saccounty.net
Subject: Amendment to Rule 421

I was unable to attend one of the public workshops on Fireplace Curtailment in person.

I want to register my 100% disagreement with changing to a single stage no burn program. The current program is not wonderful but at least it recognizes that some wood stoves are more efficient than standard fireplaces and gives the owners of those stoves some advantages. We put a significant investment into efficient wood and pellet stoves 3 and 5 years ago. We use these stoves as our single source of heating even though we DO have central heating available. Our central HVAC system is very old and inefficient but would cost over \$15K to upgrade. We chose to spend less to put in efficient wood or pellet stoves.

Changing the burn program would prevent us from using a much more efficient and cost effective source of heating than our HVAC. Please consider how you can provide exceptions that are MORE than just "those with only wood source of heating". Our stoves allow us to heat just a single room where we spend 90% of our time instead of 100% of the home with HVAC.

I am TOTALLY against the proposed change for the reasons stated above. The additional possible reductions in particulate matter are inconclusive and certainly affected more by other localities who have no such burn restrictions. Please do not punish Sacramento County residences.

Alan Douma
Orangevale, CA.

Marc Cooley

From: ALETA KENNARD
Sent: Monday, July 27, 2009 8:42 AM
To: Marc Cooley
Cc: KEVIN J. WILLIAMS
Subject: FW: Air quality workshops

From: Woodstove
Sent: Monday, July 27, 2009 8:19 AM
To: ALETA KENNARD
Subject: FW: Air quality workshops

From: Robert Brown [mailto:rbrown@cwnet.com]
Sent: Wed 7/22/2009 11:23 AM
To: Woodstove
Subject: Air quality workshops

Dear Board Members,

This is the only place on your website I found where the public can possibly make comments or contact you; hopefully you will be able to read my comments through this site. I am unable to attend the public meetings regarding possible stricter regulations on fireplaces and wood burning appliances but do earnestly wish to make my opinion known to you for consideration. I have Asthma, am a postmenopausal women and suffer from air-borne allergies. During Autumn, Winter and early Spring when people use their fireplaces and wood burning appliance my health deteriorates and I have to labor for breath as well as have burning eyes, nose and throat. Lack of sufficient oxygen makes me slow down physically and mentally to where it is a struggle to function. Filling myself with medications help only minimally so the burning season is a struggle for a normal life. Where I reside my house fills with smoke so badly that it actually leaves a heavy layer of particles on every horizontal surface in my home. But the bad air is everywhere in Rancho Cordova, stores, church, etc. so there is no escaping the problem. I thank you for working on what must be a very difficult problem and satisfying everyone is impossible. But please, take health considerations above profits of companies. There are thousands of us suffering from these bad air problems, many of them children who will grow up with damaged lungs. I wish I could encourage you to make much stricter regulations than are being proposed and eliminate fireplaces and wood burning appliance use on many more additional days, eight is not enough, because the problem affects us every day the air is filled with smoke not just a fixed number of days a season, it is just a matter of how severely we are affected on individual days. Sacramento is ranked seventh-worst in the nation for ozone pollution and yet people are allowed to continue burning. Too many fireplace and appliance users do not obey the no burning days and you have no way to enforce compliance on a day to day basis for all of Sacramento. Total ban would seem a more realistic rule but I understand you are doing what ever you can to help and I thank you so much for your efforts.

Respectfully yours,
Rosalie Brown

7/27/2009

7-29-09

Barbara Mendoza
2113 Rachael Way
Carmichael, CA

She has a wood burning insert stove and wants to have the ability to continue to burn on days that AQMD classifies as a burn day.

Lynn



SACRAMENTO
METROPOLITAN

AUG 08 2009

AIR QUALITY
MANAGEMENT DISTRICT

COUNTY OF SACRAMENTO

Board of Supervisors

SUSAN PETERS

Supervisor, Third District

July 30, 2009

Barbara Mendoza
2113 Rachael Way
Carmichael, CA 95608

Dear Ms. Mendoza:

Thank you for calling my office this week to express concern about expanding the ban on burning wood during the winter.

In December 2007 wood burning restrictions were imposed by the Air Quality Management District (AQMD) Board of Directors to help comply with the air standards required by the Federal Government. The AQMD board consists of all five members of the Board of Supervisors, 4 members of the Sacramento City Council, a council representative each from the Cities of Citrus Heights, Elk Grove, Folsom and Rancho Cordova, and a sole representative for the cities of Galt and Isleton.

In 2007 the AQMD staff originally wanted a total wood burning ban on certain days that would be applicable to standard open fireplaces as well as to EPA certified devices and pellet stoves. A majority of the AQMD board objected to that over-reaching approach. Instead of the total ban favored by the AQMD staff, a two-stage plan was adopted to curtail wood burning during the winter recognizing that many environmentally conscious consumers purchased EPA certified devices and pellet stoves to reduce pollution. Presently, on light pollution days residents are asked to voluntarily curtail wood burning regardless whether using a standard open fireplace or an EPA certified device – there is no mandated restriction (such an approach is like "spare the air" days) -- and on less severe pollution days homes with EPA certified devices or pellet stoves can burn but others cannot with a mandatory no-burn restriction applicable to everyone on heavy pollution days.

July 30, 2009

Page 2

AQMD staff is now proposing to lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program, which appears to be along the same approach as the original recommendation rejected in 2007. Workshops recently were held to solicit public opinion and I do not yet know when AQMD staff will bring the newest proposal before the AQMD Board.

Please be assured that I will take your opposition into consideration (last time I was not in favor of a single stage no-burn program). To make sure your views are noted for the record, I have taken the liberty of copying the AQMD Executive Director, Larry Greene, on this correspondence so he is made aware of your opposition and request that he notify you as to when the proposed amendment will be on the AQMD agenda.

Again, thank you for taking the time to express your concerns.

Sincerely,

A handwritten signature in cursive script, appearing to read "Susan Peters".

SUSAN PETERS
Supervisor, Third District

Cc: Larry Green

Marc Cooley

From: Tanisha Ender [tender@durafame.com]

Sent: Saturday, August 01, 2009 11:13 AM

To: Marc Cooley

Subject: Sacramento County Fireplace Curtailment

Mr. Cooley,

When is the deadline to submit comments on the proposed amendment to Rule 421 and when will these comments be presented to the Board?

P.S. Are you the same Marc Cooley that owns/operates "Cooley Enterprises"? In my previous years working with John Deere/AGRIS (AgStar/2 accounting software) the name is familiar.

Please advise at your earliest convenience.

Thank you,

Tanisha M. Ender
Marketing Assistant
Duraflame, Inc.
P: 209-461-6628
F: 209-462-9412

Called 8/3/09

Can still submit, we would your comments sooner rather than later

Marc Cooley

From: Steve Holl [steve@hollconsulting.com]
Sent: Monday, August 03, 2009 12:01 PM
To: Marc Cooley
Subject: Proposed Rule Changes for Household Burning

Marc Cooley
Sacramento Metropolitan Air Quality Management District
777 12th Street, #3
Sacramento, CA 95814

Dear Mr. Cooley:

This letter is in response to the Air Quality District's proposal to establish mandatory episodic curtailment of wood burning (proposed rule 421). In summary, I believe the District's staff report is flawed and the recommendations are counter-productive to individuals who believe air quality is important and there are less draconian solutions.

Air quality is important and the gases and smoke generated by fires have been reduced dramatically since the pre-settlement period when an estimated 4.4 million acres burned annually in California. Regulatory and technological developments have contributed to this improvement and should continue in the future.

The staff report references a state report that estimates 0.28 cords of wood is burned annually, per household. This data is over 20 years old and represents use in a rural area, where fuelwood was inexpensive. It does not provide a reasonable estimate of actual use per household on a statewide basis because fuelwood costs vary by geographic area and a lower proportion of households in urban areas use their fireplaces. The staff report provided another estimate of annual household use in Sacramento at 0.92 cords per year. Many recently constructed homes have gas-fired faux logs in their fire place and therefore, never burn wood. The staff report did not provide any data on the statistical reliability of that substantially higher value. Thus, there does not appear to be a reasonable estimate of how much household burning actually contributes to Sacramento's air shed.

Secondly, EPA-approved burning devices will reduce emissions and that is exactly why responsible citizens purchased those devices. However, the staff report fails to stratify household burning sources to identify emissions by type of wood burning device. Assume half the number of wood stove and inserts, and all pellet stoves are EPA-approved. Based on the average number of wood burning devices in Sacramento, 22% of the population has made a conscientious effort to reduce their emission footprint because EPA-approved wood stoves and inserts reduce the amount of smoke generated per hour by 94%.

Rule changes that affect an entire population should be based on sound science. The District's proposed rule changes are not based on sound science, but rather, crude estimates without supporting data and assumptions. The voluntary restrictions that were employed in 2008 were effective as there was a 57% reduction in the number of people burning during Stage 1 restrictions. Unfortunately, the Air District did not estimate that change in emissions from a burn day, Stage 1, or Stage 2 restriction days.

Any additional restrictions on household fuelwood burning must include an analysis of the effectiveness of EPA-approved devices and how that effectiveness reduces emissions. There is no shortage of excessive fuels in nearby forests or orchards. Rather than encouraging citizens to use those sources of fuels, which must be disposed of anyway, in approved devices,

8/3/2009

the Air District simply wants to eliminate all burning. I recommend that the Air District re-evaluate its proposed rule changes and develop a proposal that is 1) based on sound science, 2) includes an analysis of the effectiveness of the current regulations, and 3) encourages people to reduce their emissions rather than simply outlawing everything.

Sincerely,

Steve Holl
7049 Pine View Drive
Folsom, CA 95630

916/203-8043

8/3/2009

Marc Cooley**From:** Pamela Reed [p.reed_1@comcast.net]**Sent:** Monday, August 10, 2009 9:59 AM**To:** Marc Cooley**Subject:** Re: PUBLIC WORKSHOP: SACRAMENTO COUNTY FIREPLACE CURTAILMENT

I have been out of town, so I was unable to attend any workshops. However, I would like to say that I believe 100% that PG&E is behind this movement, along with a few enviromentlists who are apparantly well paid, and have no concerns at the sky rocketing costs of our utilities. I have used wood fireplace to heat my 1600 sq. ft home for 7 years. We seldom purchase wood, we harvest it legally ourselves. This past winter my heating bills went from \$15.00 per month to over \$100.00 per month. And the number of no burn days are not just the few you profess, almost all of December 2008 was under no burn. Can I go ahead and send you those bills so that you can re-imburse me for my additional expenses. By the way both my husband and I have breathing issures and we didn't get it from the fireplaces in our neighborhood.

Pamela Reed

p.reed_1@comcast.net

----- Original Message -----

From: Marc Cooley**To:** Marc Cooley**Sent:** Monday, July 06, 2009 10:25 AM**Subject:** PUBLIC WORKSHOP: SACRAMENTO COUNTY FIREPLACE CURTAILMENT

**PUBLIC WORKSHOP:
SACRAMENTO COUNTY FIREPLACE CURTAILMENT**

The staff of the Sacramento Metropolitan Air Quality Management District (SMAQMD) will conduct five public workshops to inform Sacramento County residents and businesses about proposed amendments to Rule 421, Mandatory Episodic Curtailment of Wood Burning Devices.

Wood burning in fireplaces and wood stoves is the largest single source of Sacramento's wintertime air quality problems, which can cause serious health problems, including premature death. Rule 421 improves wintertime air quality by prohibiting burning wood when the concentration of fine particles in the air is predicted to exceed health standards. The proposed amendments would lower the pollution threshold for declaring a no-burn day and replace the current two stage no-burn program with a single stage no-burn program. The recommended amendment is expected to result in 8 additional no-burn days and 4 fewer poor air quality days. We are seeking input on this recommendation and other optional thresholds.

The rule will continue to be in effect each year for the months of November, December, January, and February. Residences where wood burning is the sole source of heat or is a financial hardship are exempt from the rule. Gas logs and gas fireplaces may be used anytime.

The public is invited to attend and provide input on the proposed amendments. The schedule for the open houses is shown below.

Workshop Location	Date	Time
La Sierra Community Center, Room 800 5325 Engle Rd./5330A Gibbons Dr., Carmichael	July 14, 2009	6:00 p.m.
Tsakopoulos Library Galleria 828 I Street, East Meeting Room, Sacramento	July 15, 2009	5:30 p.m.