Attachment D

Written Comments

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

CHECK BEFORE YOU BURN

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 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 noburn@airquality.org.

SUBMIT ALL WRITTEN COMMENTS BY FRIDAY, AUGUST 10.

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

I believe its a good idea - the Sacramento area has enough smog and poor air quality. I would like to see all fireplaces banned in new homes. Very few people use them. They leak warm air in winter and cool air in summer. Poor economics.

Your Name Joyce Eastin

Address 4089 Linus Way

City/State/Zip Code Carmichael Ca 95608

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

Phone Number 916-971-0355

E-mail

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

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I attended your "Open House" on July 24 2007 at the La Sierra Community Center in Carmichael.

After visiting your presentation booths and reading the literature which was available I am now aware of the value of Rule 421 and its mandatory no-burn restrictions. Hopefully, Rule 421 will be adopted.

Ann B. Shedd

Your Name: Ann Shedd
Address: 3948 Linus Way
City/State/Zip Code: Carmichael, CA 95608

Affiliation *i.e. business owner, resident, etc.*: home owner
Phone Number:
E-mail:

000152

no burn

From: Mark Urban [urbanfr@earthlink.net]
Sent: Wed 8/8/2007 9:48 PM
To: no burn
Cc:
Subject: rule 421
Attachments:

I was informed today that the comments I mailed in were torn during transit. I was asked to submit them by email. I will try, but they might not be as concise as before.

As an environmentalist, medical provider, and asthma sufferer, I understand many of the issues related to rule 421. However, I was surprised by my strong negative response to this rule. The main aspect that elicited this feeling was the sense of "Big Brother" telling you what you can and cannot do and when and when not you can do them. Sitting and relaxing by a fire is a simple pleasure and freedom. I grow my own firewood and only have the time and opportunity 5 or 6 times a year to enjoy this. Being told that on those days it may be forbidden angers me. And, like a child being told "absolutely not", only makes one want it more.

My primary suggestion is to first try a strong public education program with voluntary restrictions on those days with high particulates. Only if a meaningful program that is designed, implemented and given a fair trial fails to achieve its goals should mandatory limitations be enforced.

If a voluntary program fails and mandatory restrictions on sources of particulate matter are found to be necessary, then there should be imitations on all sources -not singling out wood fires in order to be air to everyone. My impression is that wood fires are proposed for imitations not just because they are a major source of particulates, ut because they are easy to find and restrict. Including all sources vould be more evenhanded.

Other suggestions to improve this rule would include a limit on the umber of days a season the restriction would apply. At the open house was told that there was so limit and that it could be imposed on 30 r more days in a season. This is unacceptable. There needs to be a aximum number of days per season that the restriction could apply- ight to ten days seems to be a reasonable number for the maximum.

At the open house I was told that the technology doesn't exist to lter out the particulates at the chimney. Perhaps a better goal ould be to encourage development of such technology so the restriction n wood burning would be unnecessary.

I may have included other suggestions in my original message, but I do ot recall all of them at this time.

hank you,
erri Friedman
armichael, California

000153

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1) List, in supporting documents, chemical composition of wood smoke, then compare this with other well-known toxics (ie. vehicle exhaust, cigarette smoke).
2) Reiterate, preferably through graphics, how PM2.5 affects the body, both long and short term.
3) Include a short explanation of manufactured logs' contribution as well as the contributions of certified devices.
4) Consider targeted advertising/education in neighborhoods closest to PM monitors and those neighborhoods with similar characteristics (ie. age of homes, overall demographics & number of complaints)
5) Provide graphic illustration of the combustion process
6) Create easy to use newsletter articles, PSAs, alerts, etc. for community groups to include in their publications, announcements, etc. Maybe this expands on the Air Alert system?

Your Name: Jennifer Finton
Address:
City/State/Zip Code:
Affiliation *i.e. business owner, resident, etc.*: Breathe California of Sacramento-Emigrant Trails
Phone Number:
E-mail:

July 26, 2007

RE: WOOD STOVES / NO BURN DAYS

TO WHOM IT MAY CONCERN:

WE ARE CONCERNED ABOUT THE POSSIBILITY OF NOT BEING ALLOWED TO USE OUR WOOD STOVE ON 'NO BURN DAYS.' THE STOVE IS THE SOURCE OF HEAT FOR OUR HOME — AND IS NOT USED FOR DECORATIVE PURPOSES.

TO HEAT 'ELECTRICALLY' WOULD BE COST PROHIBITIVE FOR US — AND VERY INEFFICIENT. GAS IS NOT AVAILABLE IN OUR AREA.

WE NEED TO BE ABLE TO CONTINUE USING OUR WOOD STOVE FOR HEAT — 'BURN DAY OR 'NO BURN DAY.'

PLEASE CONSIDER OUR SITUATION AND THE MANY OTHERS IN SIMILAR SITUATIONS.

THANK YOU,

Bill Thompson

Linda Thompson

13150 ROGERS RD
ZIONSVILLE, IN 46077
PH. 769-873-3600

YAHOO! MAIL

Print - Close Window

Date: Fri, 27 Jul 2007 12:39:15 -0700 (PDT)

From: "Karen Gaia Pitts" <kgp@karengaia.net>

Subject: No Burn Days

To: noburn@airquality.org

I am a senior, age 64, living in a mobile home park. My gas heater is over 40 years old. It will cost $10,000 to replace, according to the company that came out to service it. I am not sure I will be able to replace it once I retire and am on a fixed income.

Last year I purchased a small wood-burning stove to get me through the winters. It meets the EPA Phase II standards several times over at only 1.6 grams per hour (it is a small stove designed to heat only one room). You will not see any smoke coming out my chimney because it burns wood so efficiently. I use mostly manzanita, which produces less ash than oak and is extremely clean burning. It also rots several times more slowly than oak, so it can be stored over several years. I have a ready supply of this wood.

I paid $2,000 for the stove. My reason for making this investment is that I am preparing for the days of peak natural gas.

Peak oil has already occured and we will see the effects soon enough. We are already affecting the feeding of the world's hungry by turning food crop lands into biofuel farms so that people can drive their SUVs. Rain forest is being destroyed to grow switchgrass for the same reason. The peak of natural gas will follow as we switch our vehicles and electrical generation over to natural gas.

Another good reason for making this purchase is that wood burning has a net zero effect on climate change since the wood that is burned would end up in the air anyway, through decay or burning or via chipping (which uses gasoline).

Natural gas, on the other hand, contributes considerably to climate change.

I have done my share towards reducing emissions by investing in a solar hot water heater and solar photovoltaic.

I would like to add that I find it very disturbing that on the webpage http://www.airquality.org/, you offer: "**Wood Stove & Wood Fireplace Change Out** Incentive Program started again February 1 with offers of money-saving vouchers to assist in purchase of a low-emission hearth product." How many people would want to invest in a new wood stove under this program if they knew they couldn't heat their homes on the same days that they needed it the most?

I urge you to take into account the emissions rate of a wood stove, and the effects on climate change of natural gas before you make a one-size-fits-all ruling on No Burn Days.

Karen Pitts, Folsom
916-599-4329

Region IX
75 Hawthorne Street
San Francisco, CA 94105-3901

July 09, 2007

Transmittal of EPA Rule Review Comments

To: Kevin Williams , Sacramento Metropolitan Air Quality Management District
kjwilliams@airquality.org

Mike Guzzetta, California Air Resources Board
mguzzett@arb.ca.gov

From: Andrew Steckel, Rulemaking Office Chief
steckel.andrew@epa.gov

Re: Sacramento Rule 421, Mandatory Episodic Curtailment of Wood Burning Devices, draft version received July 6, 2007

We have preliminarily reviewed the draft rule identified above. This draft rule is important for regulating wood burning devices and we have no recommended changes. If adopted and submitted to us as drafted, we would likely propose to fully approve it. Please direct any questions in this regard to me at (415) 947-4115 or to Alfred Petersen at (415) 947-4118.

July 25, 2007

Supervisor Roger Dickinson
Chair of AQMD
Sacramento County Board of Supervisors
County of Sacramento
700 H Street, Suite 2450
Sacramento, CA 95814

RE: Proposed Rule 421 – Mandatory No-Burn Restrictions - **OPPOSE**

Dear Supervisor Dickinson:

As a 50 year resident of Sacramento and a home owner who has always used a wood burning fireplace to help heat my home, I am opposed to mandatory no-burn restrictions. Although the rule will not apply to homes whose sole heat source is a fireplace, which could only be a handful of homes, the proposed rule will affect those of us who try to offset the high cost of using natural gas during the winter months.

A half cord of oak at $250.00 will heat the complete front of my 1900 sq. ft. home during the winter months using my fireplace with a heatilator insert. Because of this, I am able to keep my thermostat at 60 degrees with only the bedrooms and bathrooms uncomfortable. This not only saves me hundreds of dollars in heating costs, actually if more people were using fireplaces, it would help save one of our ***waning natural resources*** which SMUD and PG&E have made quite clear we need to conserve! While my neighbors are paying $400 to $500 a month during the winter months for their gas, I am able to keep my cost at around $125.00 a month, which is obviously a tremendous savings.

I have considered purchasing and having an insert installed to help curtail the PM from my fires, but until they are more affordable or there are significant rebates, they are not feasible at this time.

Sacramento's air quality is 1000 times worse in the summer months when we are experiencing an inversion layer and that certainly can't be blamed on wood burning fires. In fact, your entire list of significant health problems from PM are caused by year round poor air quality, not solely from wood burning fireplaces as your report would suggest.

You have prohibited the installation of new indoor/outdoor uncontrolled fireplaces; prohibited the sale of any wood burning appliance; distribute educational information; and have asked for voluntary curtailment of burning wood on days when high particulate levels are projected. That should be enough until fireplace inserts are more affordable as it allows people such as myself can stay warm and comfortable in the winter without the use of natural gas and the cost associated with running the heater.

Sincerely,

Cynthia Marshall
9184 Condesa Drive
Sacramento, CA 95826 Phone: 916-363-7460

Cc: Supervisor Don Nottoli, Council Member and Vice Chair AQMD, Sandy Sheedy, and Council Member Steve Cohn

no burn

From: lapirini@comcast.net [lapirini@comcast.net] **Sent:** Mon 7/30/2007 2:12 PM
To: no burn
Cc: larry@epa.gov
Subject: EPA Certified Stoves & Fireplaces
Attachments:

To whom this may concern:

I am a Hearth Retailer and Service Company located in South San Francisco, CA. I service San Francisco County and Northern San Mateo County. I would like to learn more about how I can help those counties learn about the incentive funds you have to help encourage homeowners to change out their old and dirty wood stoves to new, cleaner-burning appliances like gas, pellet, and EPA certified wood stoves.

Question. Your page http://www.airquality.org/ displays a picture of a Vermont Castings Large Winterwarm Wood-burning insert. This fireplace exceeds EPA certifications.

When you have "No-burn" days, shouldn't those days apply to those folks with NON-EPA Certified stoves and open wood burning fireplaces??? Those are the culprits to emitting too much pollution and air toxins into the air, not the EPA Certified wood-burning appliances.

Please let me know how we might be able to implement a campaign to "Change Out Inefficient Wood Stoves" in our servicing counties.

Regards,

Laurie A. Pirini
Warm Solutions, Inc.
431 Grand Avenue
South San Francisco, CA 94080
(650)583-2393
www.warmsolutions.com

no burn

From: Scott waldmire [swaldmire@cdfa.ca.gov] **Sent:** Tue 7/31/2007 5:29 PM
To: no burn
Cc:
Subject: Smoke
Attachments:

Dear SMAQMD,

I totally support no (fireplace) burn days in the Sacramento area. I have been complaining about smokey winter days for at least 15 years. The smoke bothers my eyes, nose and lungs. I think all fireplaces should be converted to gas/ceramic logs or to pellet stoves with catalytic inserts. I would tax all un-converted fire places and use the money to subsidize conversion.

Scott

no burn

From: Al Bradley [albert.bradley@gmail.com]
Sent: Tue 7/31/2007 10:28 PM
To: no burn
Cc:
Subject: Proposed Rule 421
Attachments:

My disabled brother lives in Oak Park.He and his neighbors have limited incomes.They live in single family homes built before,or soon after , World War II. These homes are modest in size and their fireplaces do provide a way to heat the home to a comfortable temperature for many days during the late Fall,early Winter, etc. without having to use expensive gas for the furnace.One neighbor used free wood to heat his house completely throughout the winter because he could not afford the cost of running his furnace.

Proposed Rule 421 does provide exceptions for homes which have no other source of heat,but these regulations do not consider the plight of those who are trying to cut their utility costs because they need that money for food, health care,school tuition,and other pressing needs.Firewood is free for most of these people.It can be picked up in vacant lots and it's given away by other neighbors who take down old trees,etc. Many people economize by using their furnace only when they absolutely must .Forbidding such people to use their fireplace when they are cold seems unjust. Such regulations unfairly target those who are poor or who need their money for other needs.Anyone who has paid college tuition recently can appreciate the need to find extra money somewhere in the budget.Getting free heat from your fireplace or wood stove can really make the difference between having enough money or coming up short each month.

Perhaps the city could have an exception application for those who have furnaces, but choose to use wood heat to balance their budget.Surely the intent of Proposed Rule 421 is not to unfairly target those who are poor or trying to economize ?

000161

no burn

From: dan jacobson [dmj666@iname.com] **Sent:** Wed 8/1/2007 12:55 PM
To: no burn
Cc:
Subject: proposed rule 421
Attachments:

i am against the subject rule going into effect.

people should be allowed to burn in their fireplaces as well as making popcorn or other cooking in them.

if u want to cut down on this type of pollution, DO NOT ALLOW ANY MORE HOMES TO BE BUILT W/FIREPLACES!!!

dan jacobson

--

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

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WE DON'T NEED MORE GOVERNMENT REGULATIONS, GOVT. IS TOO INEFFICIENT. FIND ANOTHER WAY TO SOLVE THIS PROBLEM

Your Name ROGER E WESTPHAL

Address 7205 CIRCLET WAY

City/State/Zip Code CIRCLET WAY, CITRUS HTS CA. 95621 (7205)

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

Phone Number

E-mail

STATE OF CALIFORNIA
ENVIRONMENTAL PROTECTION AGENCY
AIR RESOURCES BOARD

P. O. Box 2815
Sacramento, California 95812

August 2, 2007

ARB Staff Rule Review Results

To: Mr. Kevin Williams, Associate Air Quality Engineer
Sacramento Metropolitan Air Quality Management District
Telephone Number: (916) 874-4851
e-mail: kjwilliams@airquality.org

From: Alex Krichevsky; (916) 324-6222
e-mail: akrichev@arb.ca.gov

The following rule, which was considered at a public workshop conducted by your District staff on August 1, 2007, was received by us on July 6, 2007, for our review:

Rule 421 Mandatory Episodic Curtailment of Wood Burning Devices

The Air Resources Board staff has reviewed the rule and, based on the information available to us at this time, we have no comments.

The rule was examined by the Planning and Technical Support Division.

If you have any questions, please contact me by e-mail or at the telephone number above.

Kathie Schievelbein
8554 Kenneth View Court
Fair Oaks, California 95628

Sacramento Metropolitan Air Quality Management District
c/o Katz & Associates
1722 J Street
Ste. 321
Sacramento, California 95814

August 8, 2007

Re. Rule 421: Mandatory No-Burn Restrictions in Sacramento County

Dear District Members:

I am opposed to the implementation of Rule 421: Mandatory No-Burn Restrictions in Sacramento County. I purchased a woodstove insert two years ago in an effort to reduce my winter heating bills. The conversion was from a standard wood burning fireplace to an efficient, clean burning wood stove that would serve as a supplemental method of heating my home. I did considerable research to determine the best options available on the market, level of efficiency of pellet/wood burning stoves, spoke to industry representatives, chimney sweep companies and determined that for my needs, the wood burning stove insert was best suited for purposes of helping heat my home during winter months and of course still provide the aesthetic advantages I sought to continue to enjoy the ambiance a fire brings on a winter day/evening. Encouraged by the local air district stove change out program; purchasing a cleaner burning EPA certified unit, was environmentally consistent with efforts for cleaner air in Sacramento County during months of November, December, January and February, I purchased a wood burning stove. The selection of wood-burning over a pellet stove was based upon the ability to operate it even during power outages.

My primary concern in the decision to go to a woodstove insert, was to reduce the cost of my winter heating bill which averaged $277-$300 per billing cycle, depending upon the relative outside temperature. Since installation and operation over two winter seasons, my average cost per billing cycle is now approximately $77-$120. This is a significant reduction in cost.

I am a single-income homeowner, I apply considerable effort to conserve energy where possible including the installation of a whole house fan to reduce electrical usage during summer months, car-pooling to work and telecommuting once per week to reduce air emissions and congestion on the freeways, respectively. When the notice is issued by the air district to not burn stoves/fireplaces, I comply without hesitation. Otherwise, I use the woodstove insert in balance with the gas furnace. Typically, I heat the lower-level (two-story structure) primarily using the woodstove insert, set the thermostat at 65/66 degrees and wear warm-inducing clothing throughout the season. Through this tandem method, I'm able to maintain a reasonable temperature throughout the house and keep my heating costs at equally reasonable levels.

I reviewed the 2007 "Wood Burning Research Final Report" conducted by the Aurora Research Group, downloaded from the Sacramento Metropolitan Air Quality Management District web site, reviewed the results and found them inconclusive but nonetheless educational. Among the results of the survey, the following was of particular interest:

- A relatively small percentage of surveyed "wood burners" are woodstove/pellet stove burners;
- A small sample size of the population polled of wood burners was not found to be statistically different from other groups polled;
- 25% of those polled in the survey cited environmental concerns as the primary reason for not burning last year; 14% didn't burn because they were asked to voluntarily not burn by the County; 7% cited health concerns;
- Four in ten of the respondents said that wood burning was not a serious cause of air pollution but that traffic was the serious contributor to the quality of air in the County;
- 80% of indoor pellet burning and 87% of indoor woodstove burning is for supplemental heat;
- The vast majority of all respondents surveyed, approved of a voluntary no-burn rule and 93% would comply with a voluntary no-burn system of controlling the relative amount of pellet and woodstove burning contributions to the overall air quality in the County.

Education was cited in the survey results as being both a need and a useful mechanism for changing public attitudes respecting how much and when they burn during winter months. Yet the mechanism the District is advancing to address air emissions, is through mandatory no-burn regulation. This places an unreasonable and disproportionate burden on a small community of overall emissions contributors, the majority of which use pellet and woodstove burning to provide supplemental heat during winter months.

Rule 421 would result in a significant adverse impact to me, my home and budget if approved and passed. I'd rather my tax money be spent on a comprehensive program designed to educate residential burners about the impact of burning on days when the air quality is already compromised by vehicle traffic and other sources of emissions, than on regulatory compliance measures with enforcement programs that are ineffective and which target innocent property owners who, on a monthly basis, have to make wrenching energy choices just to provide basic and necessary services to live in this climate and region. Consider development of a comprehensive public outreach program with focused newsletters, community events designed to educate the public as to responsible residential burning practices, informative seminars on the latest energy-saving methods of home heating and cooling. Develop an ad-hoc committee made up of members of various heating/cooling-related industries, public agencies, members of local communities to examine ways to inform and educate the public of the need to be an active part of efforts for cleaner air in the County, and to encourage public compliance with voluntary no-burn days.

Don't under estimate the community and our awareness of being part of the team of Sacramento Valley environmentally conscience residents, we are a responsible group of folks. Keep the voluntary no-burn program in place.

Thank you for your time and consideration of my comment.

Kathie L. Schievelbein
8554 Kenneth View Court
Fair Oaks, CA 95628
(916) 989-4516 (H)
(916) 322-6756 (W)

Cc: Supervisor Roberta MacGlashan

no burn

From: Charhorseranch@aol.com [Charhorseranch@aol.com] **Sent:** Sat 8/4/2007 2:15 PM
To: no burn
Cc: eeh625@hotmail.com; bobkitty@mac.com
Subject: No Public Hearings scheduled in the north area of the county.
Attachments:

Hello,

I live in Elverta about 300 south of the Placer County line on El Verano Ave. I would really appreciate having a hearing located nearer to Elverta than downtown Sacramento, Orangevale or Carmichael.

I cannot get to these locations in less than 34- 40 minutes of travel time which includes the attendant emissions from my exhaust pipe on my SVU which are considerable.

Charlea Moore
916-991-0338

8840 El Verano Ave.
Elverta, CA 95626

SACRAMENTO METROPOLITAN AIR QUALITY MANAGEMENT DISTRICT

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MY FIREPLACE is very EFFICIENT, I can HEAT The house with it DOWN TO 50° EASILY, AND LOWER WITH a SWEATER ON IT, & game on TV is AFTERNOON or evening is ALSO my RECREATION. Your Dues, by the Dozens leave California daily To CASINO'S, up To 10,000 AUTOS can Travel To Reno, Thousands of CARS can Travel To Bay Area all for their RECREATION! LETS ALL SET INTO THIS TOGETHER. LET me HAVE my fireplace! INCIDENTALLY, SEASONED OAK WOOD is made available To me, at NO COST, younger, in respect For OLDER but FOR me! I am 66 yeared, don't CARE To GO out For RECREATION! THANK you For your ATTENTION To THIS MATTER. LETS ALL "PLAY on A LEVEL Field"

Your Name ANDREW GUNN

Address 5401 J ST

City/State/Zip Code SACTO, CA, 95819

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

Phone Number (916) 454-0116

E-mail —

no burn

From: Simon Sucharski [cottage73@comcast.net] **Sent:** Thu 8/9/2007 4:33 PM
To: no burn
Cc:
Subject: Rule 421-No Burn Days
Attachments:

We are very concerned about the application of Rule 421 regarding EPA certified wood burning and pellet fireplace inserts. About two years ago we installed a wood burning insert in our fireplace to burn wood more efficiently and to reduce the emissions from our fireplace. The unit that we installed is a Quadra-Fire model 3100i which is certified by the EPA at 1.26 Average grams per hour. We believe that it is very unfair that those of us who have installed such devices will be restricted on no burn days as though we were burning in an open fireplace. We find it contradictory that the Air Quality Management Board gives out thousands of dollars in incentives for the installation of EPA certified devices with expressed purpose of greatly reducing fireplace emissions and then severely restrict the use of these devices. In a sense, this a waste of Board funds.

We ask that the Board include in Rule 421 provisions to allow the use of wood and pellet burning fireplace inserts and stoves that are certified by the EPA at or below a specified value for emissions such as 5.0 average grams per hour or less.

Sincerely,

Simon and Cathy Sucharski

no burn

From: John Ryan [ryanbrothers@sbcglobal.net] **Sent:** Fri 8/10/2007 9:04 PM
To: no burn
Cc:
Subject: Rule 421
Attachments:

Dear Mr. Greene,

As a chimney sweep and stove retailer for the past 30 years, I have concerns about the wording in Rule 421. As we are all concerned about clean air, we support your efforts in voluntary and some mandatory no burn days to spare the air. As the AQMD has recently and plans to again in the future, participate in stove change outs to get rid of old non-EPA approved appliances, I feel it is wrong to tell people that their EPA approved appliances and pellet stoves will not be exempt from mandatory no burn days. If the AQMD is going to have monetary incentives for people to change out old appliances for EPA approved appliances and pellet stoves, and then ask them not to burn this becomes a dis-incentive. If people have no incentive to change out their old appliances, this will defeat our efforts at cleaning up the air. I feel the Board should consider exempting EPA certified and pellet stoves from the rule.

Thank you for your time and attention to this matter.

John Ryan
FIRE Certified Chimney & Fireplace Inspector #FP-047
NFI Certified Wood-burning Specialist #117140
CSIA Certified Chimney Sweep #621
GSCSG Certified Chimney Sweep
Member, HPBA Pacific
Member, National Chimney Sweep Guild
Member, Golden State Chimney Sweep Guild

HPBA®
Hearth, Patio & Barbecue Association

1901 North Moore St. Suite 600
Arlington, VA 22209
Tel. (703) 522-0036 * Fax. (703) 522-0548
HPBAmail@HPBA.org
www.HPBA.org

August 10, 2007

Mr. Larry Greene
Executive Director / APCO
Sacramento Metropolitan Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, CA 95814

RE: comments regarding Draft Rule 421, Mandatory Episodic Curtailment of Wood Burning Devices

Dear Mr. Greene,

The Hearth, Patio, & Barbecue Association (HPBA) is the North American trade association of all manufacturers of; EPA certified woodstoves, pellet stoves, gas fireplaces, and other Hearth products. The retailers and distributors of these products are members of our regional affiliate, the HPBA-Pacific.

Our Association is actively involved in every effort in the U.S. and Canada to reduce PM from residential wood combustion (RWC). Our local association is very involved with your District's superlative Changeout program, and has initiated Changeout programs of their own throughout this state. Both the national association and our regional association have expressed our concerns about the district's proposed Rule 421.

We believe that the implication, embedded in the rule 421 staff report that, if Sacramento will quickly adopt this rule our area "might" avoid designation, is spurious. We are not aware of any other area in the western United States which is being told that by their EPA regional office. We plan on addressing this implication with our contacts at EPA-OAR in Washington.

We do not believe that the staff paper accurately characterizes the percentage of PM 2.5 which is attributable to woodsmoke. If, however, the staff report is correct, we cannot reconcile the provisions in your district's draft rule with that report's position, i.e. that this district has one of the highest levels of woodsmoke of <u>any</u> metro area in the western U.S. or Canada. If this report is accurate, does this rule go far enough beyond what other areas of lesser woodsmoke levels have adopted? Our association does not believe that this draft rule is appropriate for this area and we believe it must be amended to be successful.

We look forward to more discussion on this subject with you, and with members of your board.

Cordially,

John Crouch
Director of Public Affairs
Hearth Patio & BBQ Association

000171

7509 Madison Ave, suite 204D, Citrus Heights, Ca 95610

duraflame

The Cleaner, Greener Fire

August 10, 2007

Mr. Larry Greene
Executive Director / APCO
Sacramento Metropolitan Air Quality Management District
777 12th Street, 3rd Floor
Sacramento, CA 95814

RE: Comments regarding SMAQMD proposed rule 421, Mandatory Episodic Curtailment of Wood Burning Devices

Dear Mr. Greene,

Duraflame, Inc is a leading manufacturer of clean burning manufactured firelogs, which are now made from all renewable materials and are petroleum free. We are commenting on your proposed rule because we are concerned that it does not do the job it intends to do, and consequently, has the potential to cause a negative change in people's behavior. We are also concerned that the District staff's new wood smoke emission inventory has been overstated, presenting an inaccurate image of the problem to the Public. Many people in the Sacramento Metro Area have already begun to voluntarily reduce their burning or have invested in new cleaner-burning technologies. Now they are being asked to restrict their behavior even further based on a false impression of the situation.

It is not our intention to make little of the contribution that wood burning makes to Sacramento metro area air quality and the need to reduce it to reach Federal attainment standards. We acknowledge that on certain winter days when air inversions occur wood burning contributes to poor air quality and requires control. But we believe the Sacramento District's proposed rule 421 is flawed in design because it does not contain a balance of incentives and regulation to address the problem. It relies completely on policies that attempt to force behavior change through excessive restriction of wood burning appliance use. Whereas many social marketers advise a balance of incentives and regulation works best to solicit behavior change.

Targeted Rule Compliance is Overstated

The district staff's report for rule 421 estimates the proposed mandatory curtailment program would restrict burning for 30 days. This many restricted days in a 120-day period (burning season) will likely restrict wood burning on every weekend and major holiday of the winter season. Rather than promote behavior change, the Sacramento Air District's proposed low air quality threshold for triggering mandatory curtailments will undoubtedly result in non-compliant behaviors.

In fact the district's own 2007 wood burning research survey indicates that likely compliance is projected to be low, especially when taking into account the study's

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findings that far fewer people who stated they planned to comply with voluntary curtailments last season, failed to do so in practice.

The staff's emissions reduction target of a 78% compliance rate for rule 421 is flawed. According to page 54 of the May, 2007 study that target is based on all households "capable of burning wood" including both burners and non-burners stated intention to comply with the new rules. But the report indicates that over 30% of households with wood burning devises never use them. Including households that don't use their wood burning appliance in the measure for targeted compliance clearly overstates the potential benefit of the curtailment program. In fact the 2007 wood burning survey indicates that only 56 percent of active wood burners – the people to be regulated – said they would comply with the mandatory rules, and only 37 percent of people who support the mandatory curtailment concept actually complied with voluntary curtailments this last season. Further the survey question about compliance with a mandatory curtailment program only indicated that wood burning would be curtailed on the worst air quality days. Since the survey also indicated that a large segment of the respondents did not believe wood burning to be a significant contributor to poor air quality it is likely that respondents interpreted that a mandatory curtailment program would only restrict burning a few days per winter. Had the survey question indicated that the curtailment program could restrict burning as many as 30 nights per year it is very likely that more respondents would have opposed the proposal and indicated they would be less likely to comply with the curtailment program.

The wood burning survey data clearly contradicts the staff's proposed compliance rate of almost 80 percent and it is therefore extremely unlikely that draft rule 421 as currently proposed can produce anywhere near the level of wood combustion emission reduction as claimed by the district staff analysis.

Compliance Incentives

Other air districts have improved compliance with episodic curtailment programs by offering incentives to comply in the form of exemption from curtailment for use of approved clean burning technologies.

Rule 421 fails to provide any incentives in the form of exemptions for clean burning, renewable solid fuel technologies. Considering the large population of fireplaces in the Sacramento Metro area, it is important to provide cleaner burning alternatives for traditional open fireplaces to encourage fireplace users to change their burning practices.

To-date the district staff has only offered conversion to gas fueled fireplaces as an alternative for solid fuel burning fireplaces. Surveys have shown that the average cost to convert a wood-burning fireplace to natural gas burning is $1,200, a significant expense that many occasional users of their fireplace are unlikely to make based on their limited use of the appliance.

Promoting increased use of natural gas, as a substitute for wood burning, will also result in a dramatic increase of non-renewable green house gas emissions. Since the State of California has recently mandated significant decrease in green house emissions over the next ten years, the district's current policy to promote an increase in natural gas

fireplaces and heating stoves is flawed policy that is likely to face further limitation or regulation in the near future.

Other air districts like the San Joaquin Valley and the Seattle Metropolitan area advocate manufactured firelogs, such as duraflame, as an inexpensive, cleaner burning alternative for fireplaces. In addition to producing up to 80 percent fewer fine particulate emissions than burning wood for an equivalent duration fire, new bio-wax firelogs made from all renewable materials, such as those now offered by our company and other brands, produce significantly lower greenhouse gas emissions than natural gas fireplaces, or even burning renewable cordwood.

Manufactured firelogs are also cost-effective. At an average cost per fire of $3.00, a household could use firelogs for several years before they would come close to cost of conversion of their solid fuel fireplace to burn natural gas. In fact, a December, 2006 analysis by MARAMA (Mid Atlantic Regional Air Management Association) of the cost effectiveness of emission reduction tactics for fireplaces, including conversion of fireplaces to natural gas, concluded..." for wood burning fireplaces used for aesthetics manufactured wax/fiber firelogs offer the lowest cost per unit mass of air pollutant reduction."

So far the Sacramento district staff has chosen to ignore this opportunity as it prefers to keep its message simple - "no solid fuel burning for aesthetic use is acceptable". While the message is simple, such a narrowly focused approach will likely encourage defiance rather than compliance with the District's wood burning emission reduction programs. It's been proven time and again that carrot or stick approaches are more successful than just the stick.

Wood Smoke Emission Inventory is Incorrect

We are concerned that the District staff's estimate that wood smoke accounts for 45 percent of winter time PM 2.5 emissions is grossly overstated. This is higher than most other locations in the State of California, and past emissions surveys by CARB indicated that Sacramento had lower emissions of wood smoke than other air districts in the state. It's hard to accept that wood burning has increased so much in recent years, when in fact the recent 2007 wood burning survey indicates a decline. There appears to be some inconsistencies between the emissions estimates staff has made based on the 2003 studies cited in the staff report and actual usage practices of burning wood reported by the District's recent, May 2007 Wood Burning Research Study. We don't understand why the staff is using some statistics from a 2003 survey and some from the more recent 2007 survey. It seems a more consistent approach is to use the most recent 2007 data for both wood consumption and targeted compliance rates.

The 2007 study shows even less wood burning usage than the 2003 studies the staff has used for its projections (in fact it indicates that the voluntary program implemented last year had a positive effect and reduced wood burning frequency). While the district staff has proposed to increase the average household wood consumption factor currently used by CARB from .28 cords per year to .92 cords per year, a 300% increase, that level of usage is not supported by the recent 2007 wood burning survey.

To the contrary, the recent survey reports that the average wood-burning household consumes about 5-6 pieces of wood per fire in a fireplace. That amount of wood is about

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one cubic foot in area or similar in size to small bundles or boxes of firewood that are commonly sold at retail outlets. A cord of wood is equal to 128 cubic feet of well-stacked wood. Therefore if one cubic foot of wood is the average current consumption rate for an individual fireplace fire in the Sacramento Metro area, CARB's current measure of .28 cords of annual wood use equals approximately 36 fires per year, whereas the district staff's proposed new consumption rate of .92 cords per year would equal 118 fires per year for the average wood burning household.

The average wood burning household would have to burn a fire in its fireplace almost every night during the winter months to meet the staffs proposed new consumption figures, yet the district's recent wood burning survey doesn't support such high frequency of burning. In fact the 2007 wood burning survey indicates that only about 1/3 of all households are active wood burners, and that 58 percent of wood burning households use their fireplaces one time per week or less. Based on a 120-day burning season in the Sacramento Metro area, the recent survey indicates the majority of active fireplace users only burn an average of 18 nights or less per season. This is half the rate of CARB's current consumption measure and 15 times lower than the staff proposed consumption rate for wood burning.

Granted the average usage rate will be inflated by the small minority of fireplace users that burn more frequently, and by more frequent and longer duration burning by the minority of households that use wood burning stoves and inserts. It appears CARB's estimate for wood burning accounts for such increased usage by a minority of users. But the recent 2007 data in no way justifies the District staff's proposal to increase the average annual wood consumption rate of wood burning households by over 300 percent.

Continued use of CARB's wood consumption rate is supported by the current data and would reduce the estimated ratio of wood smoke contribution to PM2.5 emissions in the Sacramento Metro area by more than half, meaning the contribution of wood smoke to winter time PM 2.5 would be likely be under 20 percent of total contribution sources.

Further Analysis is Required

The staff proposes that if its draft rule 421 is implemented it will dramatically reduce PM 2.5 particulate emissions, and may allow the District to reach attainment of new Federal PM 2.5 standards. This assumption can only be reached by overestimating the volume of wood burning emissions, and the emissions reduction benefit of the proposed rule. It is unjust and unrealistic to make such broad overstatements to lead the public and the Air District Board to believe that the Metro Area can meet more stringent PM emission standards just by regulating wood burning. We suggest that further study of the staff analysis is required, as the current wood burning data does not support staff assumptions, and hence the basis for this rule making process is flawed.

Further, the district staff should seriously consider amendments to the proposed rule that would increase compliance rather than encourage defiance. Increasing the air quality measure to trigger curtailment days so wood burning is only curtailed on the worst air quality days will increase compliance. Encouraging fireplace users to switch to cleaner burning fuels like manufactured firelogs and exempting their use during curtailment periods will also improve compliance by giving people options to burn cleaner as opposed to only difficult to enforce restrictions.

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As other air districts have proven, it is possible to make substantial reductions in wintertime particulate emissions without restricting fireplace use as significantly as draft rule 421 proposes. The staff report indicates that the nearby San Joaquin Valley has improved its air quality by 30% with its curtailment program. That program exempts the use of firelogs from curtailment on voluntary no burn days and uses a much higher AQI measure to trigger mandatory curtailments than the Sacramento district has proposed. The San Joaquin Valley has proven its possible to make big improvements without excessive restrictions and we encourage the District to consider such a model for its rule.

We appreciate your consideration of comments, and we stand ready to partner with you in your efforts to improve wintertime air quality.

Sincerely,

Chris Caron
Vice President, Brand Development

cc; Bob Cline, Cline and Duplissea

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Jeffery Yang

From: David Smith [dfsmith@c21selectgroup.com]
Sent: Tuesday, August 28, 2007 5:56 PM
To: Jeffery Yang
Subject: Notice of Public Hearing - Comment
Follow Up Flag: Follow up
Flag Status: Red

ello,

hile I understand the need to manage particulate matter on certain cold days, I find it highly deceptive to publish ur notice of the hearing to address what is essentially the curtailment of using one's wood burning fireplace during riods of low air quality. While I understand that the Board is attempting to cover other, lesser known devices other an a fireplace, the Notice should have at least included wording illustrating the most common example: the wood rning fireplace.

is will clearly not be a popular regulation. I suspect the measure will be adopted no matter what you receive in the y of comments. At least tell the public what's really being done, and don't hide the purpose in some bureaucratic phemism that is meaningless to many.

spectfully,

vid Smith

---

vid F. Smith
nite Bay, CA
nail: davidsmith@starstream.net

2007

Jeffery Yang

From: ljlaurent2@netzero.net
Sent: Tuesday, August 28, 2007 11:26 AM
To: Jeffery Yang
Subject: Curtailment of episodic burning
Follow Up Flag: Follow up
Flag Status: Red

ule 421.

omment: Excellent idea to curtail burning as required for air quality.

hink this rule should be extended to more months because the air quality is a health issue during more months than ovember through February.

s ridiculous for a few people to be polluting the air with INDOOR & OUTDOOR fires that serve no real purpose, ile polluting the air for millions of humans.

is is the computer age: if people need to stare into flames, let them get a screen saver to do it.

ase recommend extending the times this rule applies. We need it.

Laurent

2 Forrest St. Folsom 95630

007

Jeffery Yang

From: DONNY HOMER
Sent: Monday, September 03, 2007 9:30 PM
To: Jeffery Yang; ALETA KENNARD; BRIGETTE TOLLSTRUP
Subject: FW: Support for Rule 421
Follow Up Flag: Follow up
Flag Status: Red

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om: Lea2skip@aol.com [mailto:Lea2skip@aol.com]
nt: Monday, September 03, 2007 8:17 PM
: DONNY HOMER
bject: Support for Rule 421

: Jeffery Yang, Sacramento Metropolitan AQMD

ım: Lea Brooks

: Please approve Rule 421

Yang:

ank you for the opportunity to comment on proposed Rule 421, which would restrict burning in fireplaces, wood stoves and er wood-burning devices from November through February.

ongly support this rule. I am a longtime bicycle commuter and am very concerned about the health effects of particulate air ution from wood burning. The pollution is very noticeable during my commute to and from work on the American River kway bike trail and in my neighborhood during the winter months. I very much appreciate the AQMD's efforts to control this ution.

Brooks
3 Roaring Camp Dr.
ıcho Cordova CA 95670
!skip@aol.com

****

2007

Sacramento Area Bicycle Advocates
SABA
Making Sacramento a cycling capital

909 12th Street Ste 114 Sacramento, CA 95814 (916) 444-6600 www.sacbike.org

August 31, 2007

Sacramento Metropolitan AQMD
777 12th Street, 3rd Floor,
Sacramento, CA 95814,
Attention: Jeffery Yang

Re: Rule 421, Mandatory Episodic Curtailment of Solid Fuel Burning

Dear Mr. Yang:

Thanks for the opportunity to comment on the proposed Rule 421.

The Sacramento Area Bicycle Advocates (SABA) strongly supports measures to clean our air, such as Rule 421. Since cyclists engage in frequent and sometimes long duration physical activity, we experience poor air quality first hand. We don't like breathing dirty air.

Many cyclists are motivated to bike precisely because of our poor air quality, yet ironically they may suffer from the effects of trying to do the right thing. Poor air quality not only turns existing cyclists into victims, it discourages potential cyclists.

We urge SMAQMD to adopt Rule 421 and continue to do everything feasible to combat particulate and all other forms of air pollution year round.

SABA is an award winning nonprofit organization with more than 1,400 members. We represent bicyclists. Our aim is more and safer trips by bike. We're working for a future in which bicycling for everyday transportation is common because it is safe, convenient and desirable. Bicycling is the healthiest, cleanest, cheapest, quietest, most energy efficient and least congesting form of transportation.

Yours truly,

Walt Seifert
Executive Director

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