Dear Bay Area Air Quality Management District Board Member,

As an individual in the wood heating industry/a wood heat user (choose one), I am writing to object to the proposed changes to Regulation 6, Rule 3 as laid out in your proposal that was published on Tuesday, August 18.

The failure of the Air Board to recognize three important aspects of this program is disturbing.

* New Building Construction Requirements: EPA Certified and EPA Qualified Wood Burning Devices need to be put back into proposal language that would include these items in new building construction. Limiting consumer and builder choices to gas and electric devices is poor governing by the Air District. Removing all solid fuel options inhibits consumers from making an informed decision on how to heat their home. Many areas within the district are located in propane areas where clean burning solid fuel devices are the most effective and efficient way to heat a home. These rural homes are more susceptible to loss of power when solid fuel devices can provide heat. There are a number of hearth products available that will help the district achieve their regional PM 2.5 goals without removing wood devices all together from new construction. The district should also consider EPA Qualified devices are they are not used as the primary source of heat, and are installed in custom build homes, not tract housing.
* Two Stage Burn Program: The District should also implement a two stage burn program allowing EPA Certified devices to burn at a higher PM 2.5 threshold than 35 while those who have uncertified devices, would not be able to burn at that stage. At Stage 2 all burning shuts down. A two stage program like this encourages those with gross polluters in their homes to upgrade to cleaner burning devices, including gas. If you gave consumers the option to upgrade to EPA certified devices which had a solid fuel option, the air district would be MUCH more likely to achieve the PM goals that the district is trying to achieve.
* Sole Source Of Heat Exemption: A sole source of heat exemption must be included for those persons who are low income and can’t afford to change out or upgrade their device. To preserve their dignity, this should not include any type of registration process. This should be a separate category all together.

The BAAQMD seems to view wood burning as the only contributor to pollution instead of as a low cost, sustainable fuel that can deliver heat to homes using clean burning technology. Open hearth fireplaces and old, non-EPA wood and pellet stoves could produce upwards of 100 grams of particulate matter per hour. New stoves and fireplaces are emitting less than 4.5 grams per hour in most cases. Technological advances in in the hearth industry coupled with public education to teach consumers how to properly use these appliances have significantly contributed to solving air quality problems all over the nation.

Other air districts recognize these benefits and use them to their advantage - to encourage those who still own dirty burning appliances to invest in cleaner burning technology. For example, take a look at the San Joaquin Valleys Air Pollution District’s new program which gives consumers with *registered* EPA certified devices the ability to burn more with an EPA certified device. And, they see the imporantance of allowing consumers to have choices when deciding how to heat their home. Disallowing all solid fuel in this district is poor governance.

Sincerely yours,

Name

Address

City, State, Zip

Phone Number