



KEY ISSUES RELATING TO THE SAN JOAQUIN VALLEY AIR DISTRICT WOOD SMOKE REGULATIONS FOR MEMBERS IN THE SAN JOAQUIN VALLEY AREA

Thank you for the opportunity to present several important points of information that relate to Rule 4901.

1. Up to 98% of the PM 2.5 that can be attributed to wood smoke is created by gross polluters which include older Open Fireplaces, Non-EPA certified wood heaters and agriculture burning. These gross polluters should be the primary targets for control measures.
2. Homeowners who choose to use solid fuel (wood or wood products) as a heating resource must be able to use Clean Burn technologies that do not create Visible Smoke. **Failing to include EPA-certified products removes any incentive for homeowners who choose to use solid fuels** to change out and upgrade their smokey, gross polluting appliances.
3. **There is a flawed assumption by the air district that natural gas will replace ALL solid fuel usage.** That's simply not realistic. Many homeowners still choose to use solid fuels for a large variety of reasons. Lower heating costs, the desire to use a renewable locally produced fuel source, and the increased popularity of bio-mass fuels as a way to curb global warming, to name a few.
4. Over 90% of the hearth products sold and installed in the air district from 2006 through 2008 are gas fueled appliances. The few solid fuel products sold are either EPA certified wood heaters or wood pellet stoves. These appliances **do not create Visible Smoke** when operated properly and responsibly.
5. Enforcement of Rule 4901 episodic mandatory curtailments will use **Visible Smoke** to trigger citations. The potential use of clean burn technologies during mandatory curtailment episodes will not add to enforcement costs or trigger additional citations.
6. Clean Burning EPA certified appliances are lumped in with Gross Polluters during mandatory curtailment episodes even though they do not create Visible Smoke. **Failing to separate Clean Burning technologies from Gross Polluters REMOVES any incentive for homeowners** to upgrade their appliances which will keep Gross Polluters operating in the air shed for many more years to come. In essence, **Rule 4901 discourages the replacement of old polluters.**
7. **Rule 4901 is confusing to the public.** The rule allows gross polluters to operate and create **Visible Smoke** right up to the point that the air becomes unhealthy. Homeowners should be asked to act responsibly every day and every night. They have the power to reduce Visible Smoke voluntarily.

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8. **It is unfair, unreasonable and poor government that penalizes homeowners** who purchase Clean Burn appliances, to the tune of two to three thousand dollars, in an attempt to act responsibly and not create **Visible Smoke** every day while heating their homes with an alternative, renewable fuel resource.

Your voice is important. In fact, Your Voice is the only way to affect any change to Rule 4901. Here is what you can do:

FIRST, write a letter to any or all of the San Joaquin Valley Air District board members and expressed your own concerns. A helpful, sample letter template is available to make it easier.

SECOND, call the SJVAD board member from your area. They are your elected representative and they work for you!

THIRD, call again. Your Voice is the **ONLY WAY** you can affect a change and your representative needs to hear what **YOU** want changed.

ASK FOR THESE CHANGES:

1. **Use “Visible Smoke” as part of the defining language in the curtailment section.** Change Section 5.6.1 to read: “No person shall operate a wood burning fireplace, wood burning heater or outdoor wood burning device that creates visible smoke whenever the APCO notifies the public that an Episodic Curtailment is in effect for the geographic region in which the wood burning fireplace or wood burning heater is located.” Using **Visible Smoke** as the measure for compliance **DOES NOT** equal an exemption for EPA certified wood and pellet appliances. It requires that these appliances must be used responsibly.
2. **Create a Public Outreach message to begin November 1** and extend through the end of February that asks all homeowners “Please Do Not Smoke...everyday and every night...for all our Health’s Sake.” This is a Simple Message that is clear and easy to understand and challenges everybody, including wood burners, to make positive right choices before we reach unhealthy air quality. This would act as a **Voluntary Curtailment** and stay in place from November through the end of February. The message reflects the same message that is used during a Mandatory Curtailment Episode...without enforcement and citation. The message will have Consistency and Clarity.
3. **Include EPA certified wood heaters and pellet heaters in the Incentive Program** to motivate those homeowners who still choose to use solid fuel as an energy resource to terminate the use of their gross polluters and change out to a clean burn technology appliance.

Thank you for your concern for the quality of the air we breathe.

To: _____

Date: _____

Dear Air District Board Member,

Please alter Rule 4901 in the following ways:

1. **Use “Visible Smoke” as part of the defining language in the curtailment section.** Change Section 5.6.1 to read: “No person shall operate a wood burning fireplace, wood burning heater or outdoor wood burning device *that creates visible smoke* whenever the APCO notifies the public that an Episodic Curtailment is in effect for the geographic region in which the wood burning fireplace or wood burning heater is located.” Using **Visible Smoke** as the measure for compliance DOES NOT equal an exemption for EPA certified wood and pellet appliances. It requires that these appliances must be used responsibly.
2. **Create a Public Outreach message to begin November 1** and extend through the end of February that asks all homeowners “Please Do Not Smoke...everyday and every night...for all our Health’s Sake.” This is a Simple Message that is clear and easy to understand and challenges everybody, including wood burners, to make positive right choices before we reach unhealthy air quality. This would act as a **Voluntary Curtailment** and stay in place from November through the end of February. The message reflects the same message that is used during a Mandatory Curtailment Episode...without enforcement and citation. The message will have Consistency and Clarity.
3. **Include EPA certified wood heaters and pellet heaters in the Incentive Program** to motivate those homeowners *who still choose to use solid fuel* as an energy resource to terminate the use of their gross polluters and change out to a clean burn technology appliance. These emerging technologies continue to produce cleaner more efficient appliances that are seen globally as one of the bright spots in our quest to wean ourselves from fossil fuels. The locally produced fuel when properly burned dramatically lowers our carbon footprint. Requiring homeowners to use fossil fuels is bad for our environment and our future.

Thank you for consideration of my requests.

Regards,

