



Bay Area Air Quality Management District
939 Ellis St
San Francisco, CA 94109
Attn: Tracy Lee
Regarding: Regulation 6, Rule 3- Wood Burning Devices

Dear Tracy,

We are the Hearth, Patio, and Barbeque Association, Pacific Affiliate, who serves members in California, Nevada and Hawaii. Our members sell, service and distribute wood burning products along with other home products. The Air District has clearly missed several important points that were brought up during the public workshop period, and in comments previously submitted by our association. Based on your final proposal that will go to your board shortly, the following points are changes that we would like the air district to make to this final proposal:

- **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.
- **Regional No Burn Days Versus Entire District No Burn Days:** Mandatory no burns should also be regionalized in an area that is as big as the Bay Area. Air Quality can vary dramatically based on weather conditions in Napa versus Santa Clara. Please revise this part of the rule to call regional no burn days.
- **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.

Sincerely,

Kaity Rosengren
HPBA Pacific
Affiliate Administrator