



September 1, 2015

Chairwoman Carole Groom and Board of Directors
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Re: BAAQMD Wood Burning Regulation 6, Rule 3

Dear Chairwoman Groom and Board of Directors,

The following health and medical organizations, and individual health professionals, applaud the Air District for its health leadership to reduce wood smoke pollution to protect public health. We are writing to express our strong support for the Air District's proposed revisions to the wood burning regulation and to urge the air district to step up enforcement to protect residents suffering from wood smoke pollution, and pursue additional measures that will reduce exposures to harmful wood smoke both locally and statewide.

Particle pollution from wood smoke can increase the risk of heart attacks, stroke, asthma attacks and respiratory distress, and can interfere with the growth and work of the lungs. The World Health Organization concluded in 2013 that breathing particle pollution causes lung cancer. In addition, the black carbon of wood smoke pollution is known as a potent contributor to climate change, adding to the public health urgency of stronger controls.¹

Even healthy adults and children can be harmed by breathing wood smoke, but those with compromised health are especially at risk, and children and seniors are most vulnerable. A recent study by Harvard School of Public Health of senior citizens in New England demonstrated

¹ California Air Resources Board. Short-Lived Climate Pollutant Reduction Strategy Concept Paper. May 2015.
http://www.arb.ca.gov/cc/shortlived/concept_paper.pdf

that even short term exposure (two days) to increased levels of fine particulate matter was associated with higher death rates among the study group, even in areas with annual exposures below EPA standards.²

Particle pollution also diminishes lung function, causes greater use of asthma medications and increased rates of school absenteeism, emergency room visits and hospital admissions. Other adverse effects can be coughing, wheezing, cardiac arrhythmias and heart attacks.

In the Bay Area, wood smoke pollution has been reported at very high levels in valleys and areas of heavy wood burning. A pilot project conducted by Sonoma Technology, Inc., last winter showed high levels of wood smoke pollution in Santa Rosa in areas away from the regulatory monitor.

The American Lung Association in California 2015 *State of the Air* report listed the Bay Area as the sixth most polluted metropolitan region for short term particle pollution, and seventh for annual levels of particle pollution. Several Bay Area counties' grades for particle pollution worsened in this year's report. Santa Cruz County went from an A to an F, specifically due to wood smoke pollution being captured in new monitors deployed in the San Lorenzo Valley area. These exceedances took place in the winter months when smoke from wood burning builds up and poses a health hazard.

In light of the health impacts of breathing particle pollution and the high levels associated with localized wood burning, and to protect the health of all residents, we urge the Air District to consider additional measures to reduce both regional and localized exposures, including increased enforcement on non-Spare the Air days. We appreciate the air district's recent decision to allocate significant grant funds to assist those in changing out their polluting devices for cleaner heating alternatives and prioritizing non wood-burning devices. This will benefit the health of all residents throughout the nine counties.

Our organizations also call on the Air District to engage with the California Air Resources Board to establish strong statewide measures to reduce wood smoke pollution. Within the context of both the state board's work to achieve national ambient air quality standards and the recently launched effort to develop its Statewide Short-Lived Carbon Pollution Strategy, the Air District's leadership can help to set statewide standards that will protect our communities' health and our climate from the harms of wood smoke pollution.

Thank you for your leadership in recognizing the harmful effects of wood smoke pollution and adopting more stringent regulations to control this pollutant.

Sincerely,

² Shi, L, Zanobetti, A et al, "Low-Concentration PM2.5 and Mortality: Estimating Acute and Chronic Effects in a Population-based Study," Environmental Health Perspectives, June 2015 <http://ehp.niehs.nih.gov/wp-content/uploads/advpub/2015/6/ehp.1409111.acco.pdf>

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Individuals

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