



August 28, 2009

MEMO TO: Missoula County Commissioners
Bill Carey, Chair
Jean Curtiss
Michele Landquist

FROM: West Valley Community Council
Eric Belker
Jeri Delys
Brett Deschamps
Colbert Howell
Elizabeth Oleson

RE: Proposed Air Quality Regulation Changes – Fine Particulates (PM_{2.5})

During its August 13, 2009 meeting, the West Valley Community Council summarized citizen responses to proposed regulations governing fine particulates, particularly those discharged by wood burning stoves. This citizen input was received during an April 9, 2009 WVCC meeting which featured Health Department staff who explained the proposed regulations and why they are needed. Council members also discussed the matter with their constituents the past four months. Concerned citizens representing a range of views also expressed their opinions on the matter during the August 13 meeting.

Below is a summary of the Council's recommendations, as well as the recommendations of the area's citizens:

The regulatory process needs to Achieve Balance between competing considerations:

- Protect citizens' health.

- Protect the area's industrial infrastructure from tighter, expensive emissions standards which would result from nonattainment, adversely affecting local jobs.

- Permit the ongoing use of burning wood to heat homes, which is affordable and efficient, especially for low income households.

Do not delay implementation of the proposed regulations, in order to avoid more stringent and onerous EPA-imposed standards.

Regarding wood burning furnaces, some constituents want to be able to purchase and use them. Other constituents want them used only if they are as efficient as smaller wood burning stoves, with the same level of PM_{2.5} emissions and EPA standards. Wood fired boilers are not allowed in many states because they typically emit more pollution. They are more effective if installed with large (500 gallon or more) capacity water boilers. It was suggested locally installed wood burning boilers be dual fuel systems so an appropriate alternative fuel source can be used during air pollution alerts.

Ensure the validity of the data used for purposes of measuring the PM_{2.5} particulate matter; calibrate the monitors and ensure their location is optimal. Ensure the County is not over-regulating a nonexistent problem. Continue to educate the public regarding the science behind the regulations.

Enforcement is impractical.

Educate the public by:

- 1) Providing all permit recipients with an education packet instructing them on what, how and when to burn. Inform permit holders regarding appropriate hours of operation, techniques for starting up and damping down fires, and air pollution alert protocols. Use a proactive educational approach rather than punitive enforcement to enhance voluntary compliance.
- 2) Addressing all sources of air pollution and educating the public regarding auto emissions (i.e., suggest reducing the number of automobile trips by planning errands more efficiently).
- 3) Involving the public earlier during a proposed regulatory process. Proactive education defuses resistance and increases understanding of why the regulations are necessary.

On April 9, 2009, 200 citizens showed up at the West Valley Community Council meeting to discuss the proposed air quality regulations and at least 150 stayed for two presentations by Health Department staff. Most of the individuals who participated in the April 9 meeting opposed the proposed regulations, representing a small but vocal subset of the 4,800 citizens within the WVCC precincts. Far fewer participated in the August 13, 2009 discussion which resulted in these recommendations. It is assumed the Health Department's Open Houses, brochure mailing and Missoulian articles helped educate the populace regarding the need for and content of the regulations.

One citizen asked: What future regulation may occur regarding particulate matter dispersed by travel on gravel roads? That may pose a more onerous cost to local citizens if community roads need to be paved.

Thank you for the opportunity to comment on the proposed air quality regulations.

Cc: Ellen Leahy, Health Officer
Dr. Garon Smith, Chairman, Air Pollution Control Board
Jim Carlson, Environmental Health Division
Pat O'Herren, Rural Initiatives
Addi Jadin, Rural Initiatives