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**Report and Recommendations of
Tacoma–Pierce County Clean Air Task Force
to Puget Sound Clean Air Agency**

December 2011

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Abbreviations

Clean Air Agency: Puget Sound Clean Air Agency

Ecology: Washington State Department of Ecology

EPA: United States Environmental Protection Agency

ESA: Endangered Species Act

PSCAA: Puget Sound Clean Air Agency

RACT: Reasonably Available Control Technology

SIP: State Implementation Plan

Executive Summary

[to be added after task force review of full report]

I. The Air Quality Problem

The Tacoma–Pierce County Clean Air Task Force was created in early 2011 to help the Puget Sound Clean Air Agency (Clean Air Agency) address a local air quality problem. In 2009, the U.S. Environmental Protection Agency (EPA) classified part of Tacoma–Pierce County as a “nonattainment area” for fine particle pollution (or PM_{2.5}) under the federal Clean Air Act. During certain times of the winter, the area does not meet the federal health standard for the maximum level of this pollutant.

The pollution comes from a variety of sources. But with half of the emissions coming from indoor wood burning (see Figure 3, below), it is a different challenge from past air pollution issues. To be sustainable, solutions must include finding a way to achieve both clean air and warm homes for the citizens of Pierce County.

A. Fine Particle Pollution

Definition. Dust, soot, and smoke are all “particulate matter.” Fine particles in the air measure 2.5 micrometers in diameter or smaller – commonly referred to as PM 2.5. This is a fraction of the diameter of a human hair. In the Pierce County nonattainment area, fine particle pollution comes mainly from combustion (burning) of fuels, such as wood and fossil fuels. Sources include wood smoke (from wood stoves, fireplaces, and burning of yard waste and land clearing), exhaust from motors (from cars, trucks, buses, ships, etc.), and some industrial operations. Less significant contributions come from sea spray, wind-blown dust, and fireworks.

Effect on health and environment. This kind of air pollution affects everyone. The impact on human health can be serious. Fine particles can easily enter the lungs and travel into the circulatory system, affecting the heart and lungs. Children, older adults, and people with respiratory and cardiac illnesses are especially at risk. Breathing fine particle pollution can cause coughing, wheezing and decreased lung function, even in otherwise healthy children and adults. Exposure to fine particle pollution has been linked to respiratory disease, asthma attacks, decreased heart and lung function, heart attacks, strokes, and premature death. Studies have found that even short-term exposures to fine particles can cause health problems.

Certain types of fine particles are considered toxic. For example, both diesel exhaust and wood smoke contain chemicals known to cause cancer. Each year millions of dollars are spent treating illnesses and health conditions stemming from fine particle pollution that are preventable.

Nonattainment Designation in Tacoma and Pierce County. The federal EPA, under the authority of the federal Clean Air Act, set standards and regulations for air quality in communities across the nation. The

EPA has set two standards for fine particle pollution. One standard is the 24-hour particle standard.¹ The other EPA fine particle standard is the annual standard.²

Tacoma and portions of Pierce County are currently in “nonattainment” for the 24-hour fine particle pollution standard (does not meet the standard of 35 micrograms per cubic meter) as a result of three factors: a recent change in EPA’s protective standards, the wintertime pattern of pollution in the area, and sources of fine particle pollution in the area. The same area is in compliance with the federal annual standard. (See Figures 1 and 2 for graphic representations of how air quality in the Tacoma and Pierce County area has compared to both the 24-hour and annual standards since 2002.)

Change in EPA protective standards. The federal Clean Air Act requires the EPA to conduct a comprehensive review of ambient air quality standards every five years to ensure they are set at levels protective of public health. As part of that review, the EPA set a stronger daily (24-hour) air pollution standard (limit) for fine particle pollution in 2006. This action was in response to numerous scientific and health studies that concluded that exposure to fine particle pollution, even for short periods of time, has serious health effects at lower levels than previously understood. Based on this evidence, the EPA lowered the federal 24-hour standard for fine particle pollution from 65 micrograms per cubic meter to 35 micrograms per cubic meter. The intent was to better protect human health.

Under the lower daily standard, Pierce County’s air quality is considered unhealthy on certain days of the year.

Air Quality Monitoring and Pollution Levels

The Clean Air Agency operates a network of air monitoring stations in the Puget Sound area. There is a monitor that covers the South End in Tacoma at South L Street. The levels measured at this monitor are below the former federal standard but are above the current, more protective standard (see Figure 1). While not as high as the South End monitor, fine particle pollution levels are also elevated at other Pierce County monitoring sites, including the Tacoma tideflats, Puyallup South Hill, and at several areas [where temporary monitors were located. Several of these monitors also collect data from which the Clean Air Agency can estimate the annual average concentration for fine particulate matter \(2.5 micrograms or less\).](#)

¹ The 24-hour standard is the three year average of the 98th percentile of the 24-hour air quality values for each of the three years.

² The annual standard takes the average air quality value for each of the four quarters of the year.

Fine Particle Pollution in Tacoma, Compared with the Federal Standard

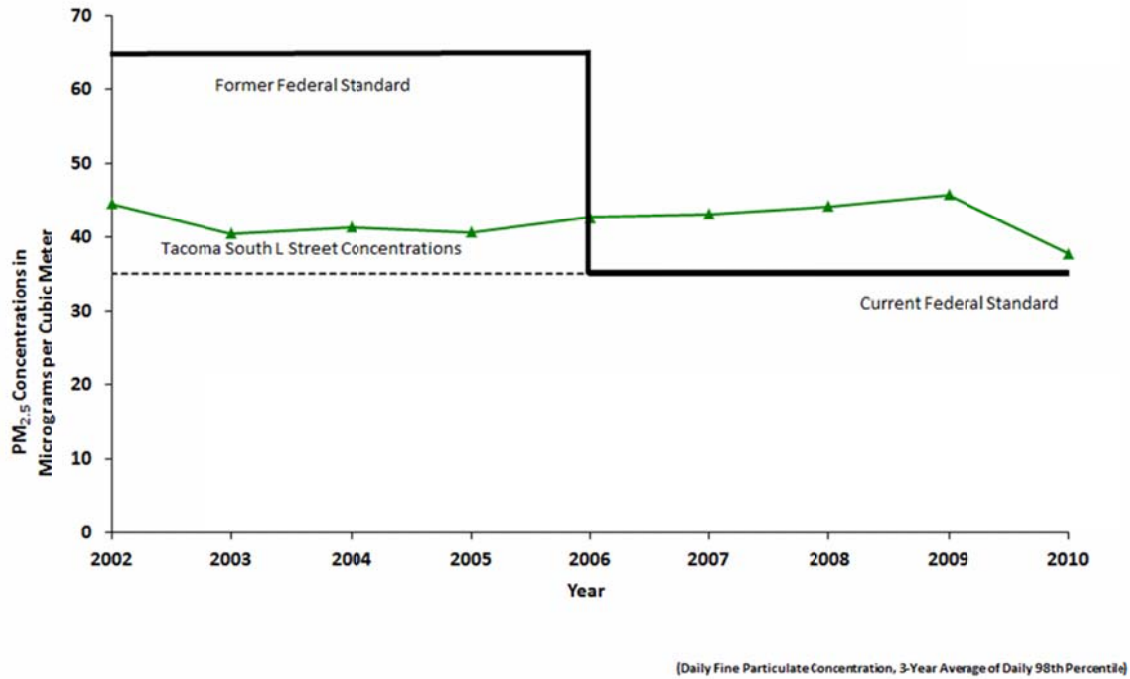


Figure 1. Fine Particle Pollution in Tacoma–Pierce County, Compared to Old and Current Federal Standards
The level of fine particle pollution recorded at this air monitor has remained fairly stable since at least 2002. The levels measured are below the former federal standard but are above the current, more protective standard.

Annual Fine Particle Pollution in Tacoma Compared with the Federal Standard

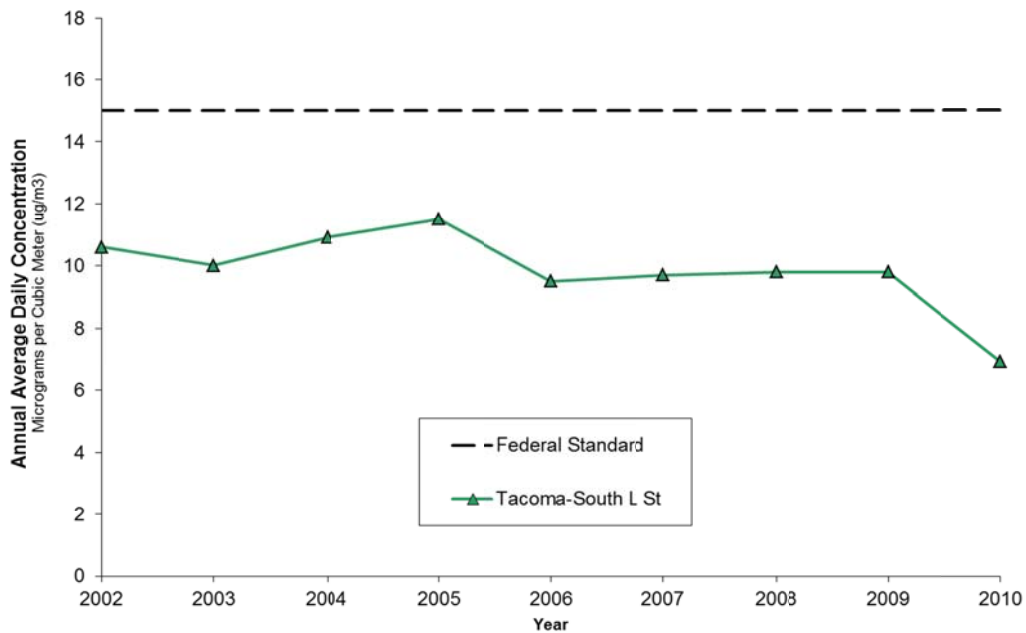


Figure 2. Annual Average Fine Particle Pollution in Tacoma at the L Street Monitor
(brief description of figure 2 needed)

Wintertime pollution pattern. The violations of the federal daily standard for fine particle pollution in Tacoma–Pierce County occur in the late fall and winter months (see Figure 3). Looking at fine particle pollution levels by month for a 10-year period, as recorded at the Tacoma South L Street monitor, shows that the air pollution levels exceeded the 24-hour standard for fine particle pollution on certain days in January, February, November, and December. These are most commonly days of meteorological “inversion,” when a layer of cold air is trapped close to ground level, and pollutant levels build up rapidly. The EPA finds an area to be in nonattainment of the fine particle pollution air quality standard when the monitored air pollution exceeds the 24-hour standard a specified number of times each year, using three years of data. This ensures that an area is not designated as nonattainment just because of one bad year.

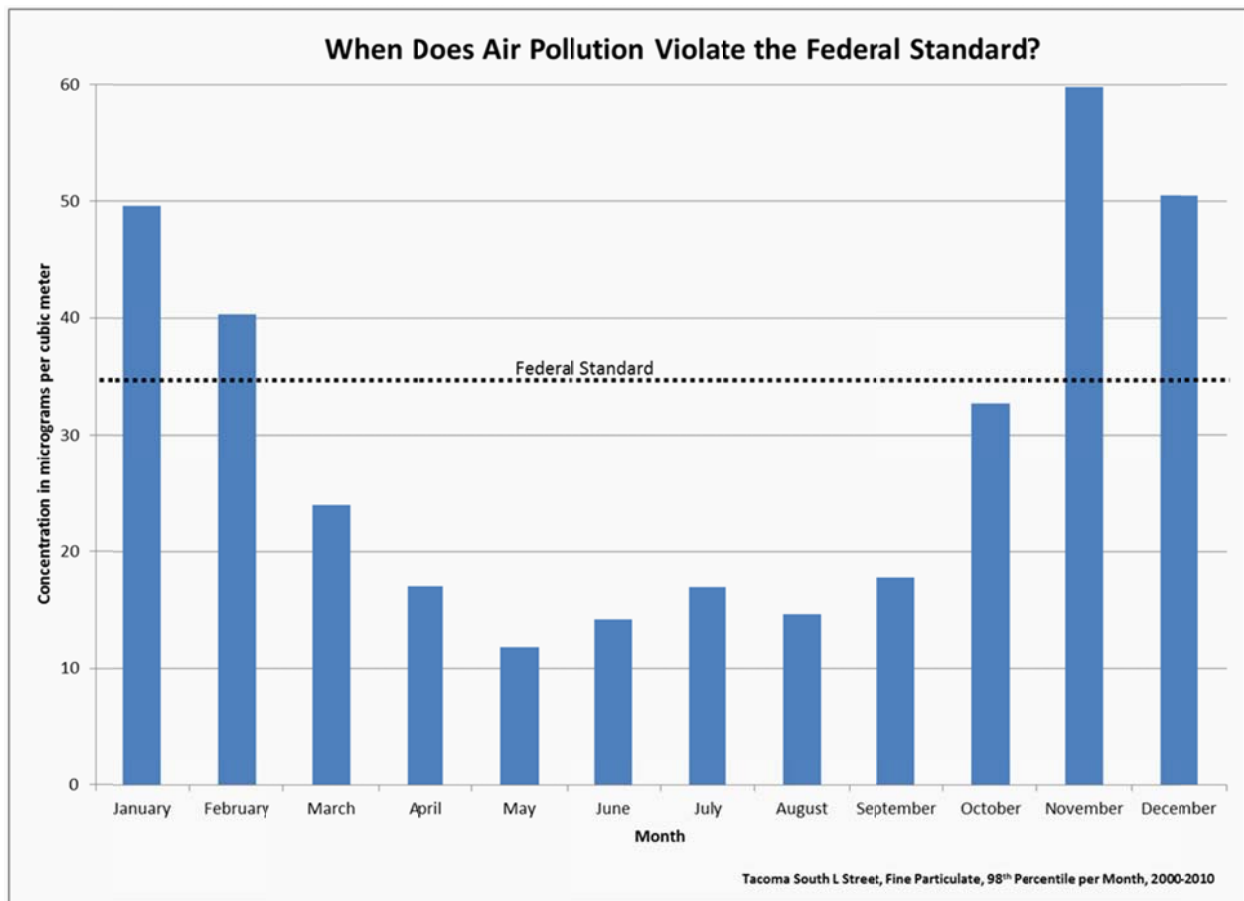


Figure 3. Tacoma–Pierce County Fine Particle Pollution by Month, 2000 – 2010

Air pollution levels at Tacoma South L Street monitor exceeded the standard for fine particle pollution on certain days in January, February, November, and December. These are days of meteorological “inversion,” when a layer of warm air traps a layer of cold air close to ground level, and pollutant levels build up rapidly.

Sources of fine particle pollution. Analysis of data from the Tacoma South L Street monitor shows that more than half (53 percent) of the fine particle pollution during the fall and wintertime is from wood smoke, with another 25 percent from diesel and gasoline vehicles (see Figure 4 below). To identify the sources, a mathematical model is used that utilizes data about the chemical composition of samples collected from the South L Street monitor.

Of the wood smoke contribution, uncertified wood stoves contribute approximately 51 percent of the fine particle pollution, while certified wood stoves contribute 27 percent, fireplaces 21 percent, and pellet stoves less than 1 percent. This is based on the estimated total number of devices in the nonattainment area, the amounts of fine particle pollution that each typically emit, and the way devices are used based on survey results.

The higher pollution levels occur at night and early in the morning, when more people are home, and more wood stoves and fireplaces are in use than during the daytime hours. Evening hours are also when colder air is trapped near the ground and winds are nearly stagnant, contributing to pollution levels rising. During the summer months, the fine particle pollution levels are lower overall and the sources are in different proportions, with motor vehicles as the highest source.

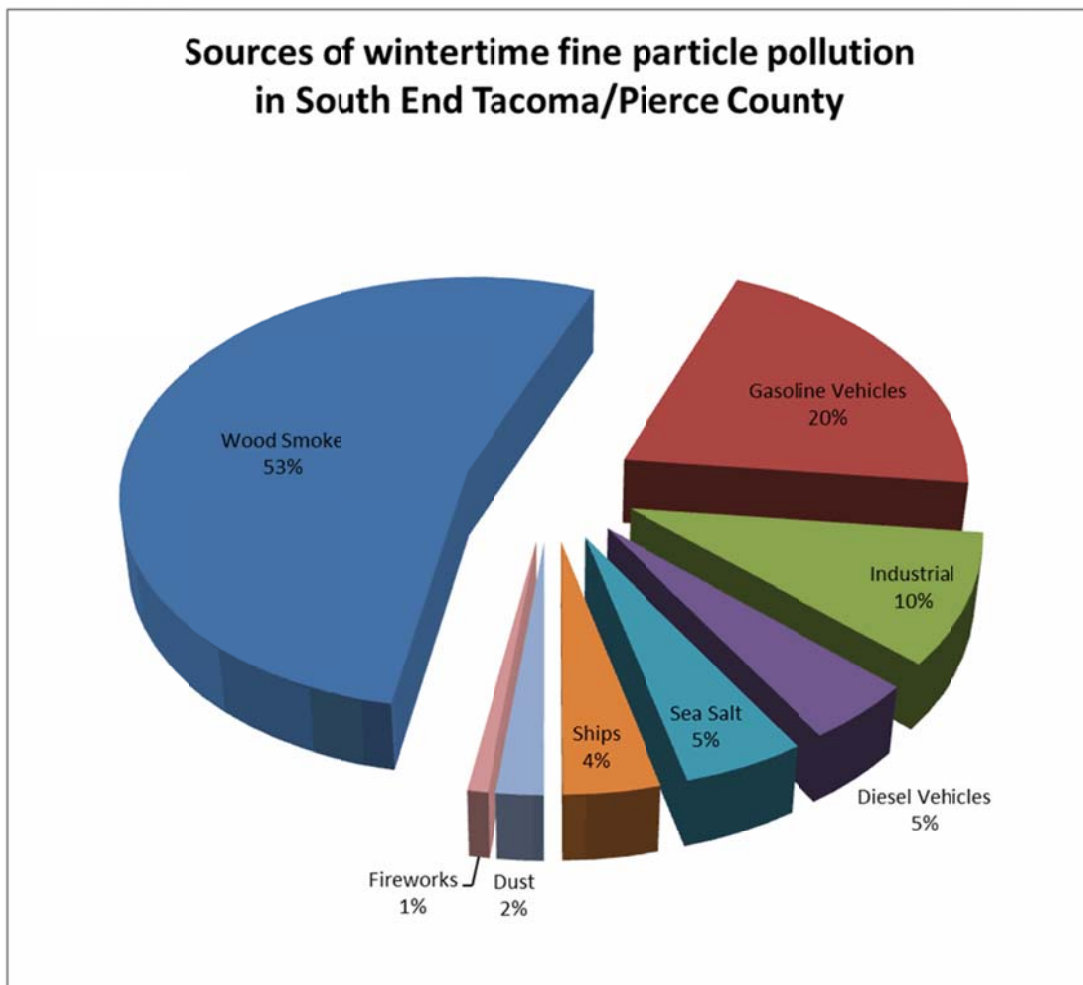


Figure 4. Sources of Wintertime Fine Particle Pollution at Tacoma South L Street Monitor

Analysis of data from the Tacoma South L Street monitor shows that more than half (53%) of the fine particle pollution during the wintertime is from wood smoke, with another 25 percent from diesel and gasoline vehicles.

Size of problem. The fine particle levels at the Tacoma South L Street monitor need to drop by at least 9 micrograms per cubic meter on peak winter days, from an average of 42.5 to between 32 and 34 micrograms per cubic meter (a little over 20 percent), in order to reach attainment. Not all emissions reductions will have an equal impact at the monitor. Reductions that take place in neighborhoods where people are living and playing will have a more immediate impact on their local air quality.

What Is the Area of Concern?

Nonattainment area. The Clean Air Act requires that a “nonattainment area” include not only the area that is violating the federal pollution standard, but also nearby areas that contribute to the violation. The Clean Air Agency and Ecology proposed a boundary to the EPA that took into account such factors as: air quality data, emissions information, population density, traffic and commuting patterns, expected growth, weather, topography, jurisdictional boundaries, and control of emissions. In 2009, the EPA approved the boundary. The Tacoma-Pierce County nonattainment area includes most of Tacoma, including the Port of Tacoma and residential areas, and most of the Pierce County urban growth area, including the cities and towns of: Edgewood, Fife, Fircrest, Lakewood, Milton, Puyallup, Ruston, Steilacoom, and University Place. The nonattainment area also includes the unincorporated communities of Parkland, Spanaway, Fredrickson, Midland, Summit-Waller, and South Hill. Figure 5 below shows the topography and major roads in the nonattainment area; Figure 6 shows the jurisdiction boundaries.

The nonattainment area includes most of Pierce County’s urban growth area, with two exceptions. The first exception is the areas of south and east Pierce County that have low population density or very few emission sources that contribute to this problem, such as Graham, Orting, and Joint Base Lewis-McChord. The second exception is areas for which the topography and typical weather patterns make it unlikely that their pollution affects the air quality measured at Tacoma South L Street. These areas include the far eastern portion of Pierce County (east of the Puyallup River and White River Valley).



Figure 5. Map of Tacoma–Pierce County Nonattainment Area, with Topography
The nonattainment area, showing topography, major highways, and larger communities.

Tacoma-Pierce County Nonattainment Area with Jurisdiction Boundaries

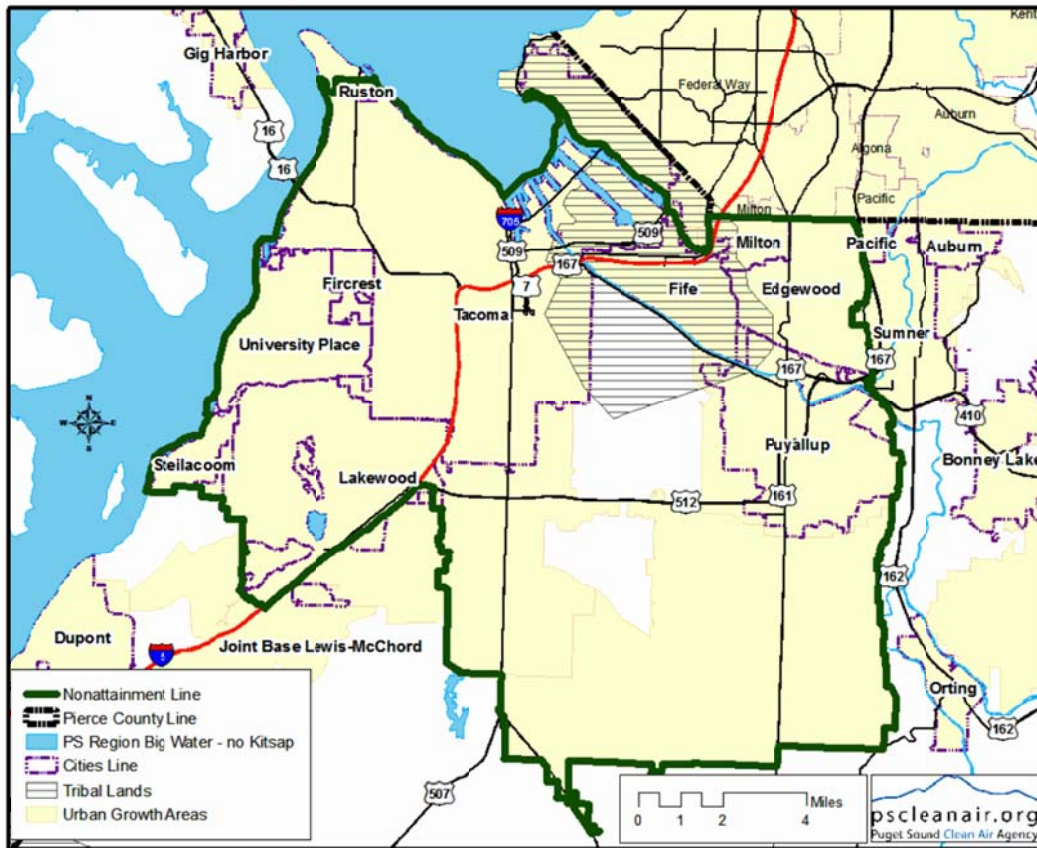


Figure 6. Map of Tacoma–Pierce County Nonattainment Area, with Jurisdiction Boundaries

Wood burning devices in use in the nonattainment area. The Clean Air Agency provided estimates of the number of households in the nonattainment area that have wood burning devices and the number in use (see Table 1), and of the number who use wood as their primary or sole heat source (see Table 2). These estimates were based on results of a survey done by the National Research Center in 2007 and U.S. Census data.

Table 1. Wood Burning Devices in the Nonattainment Area

Device	Estimated # Households that Have	Estimated # Households that Use
Fireplaces	30,900	21,200
Uncertified inserts and wood stoves	24,200	21,200
Certified inserts and wood stoves	20,200	17,200
Pellet stoves	3,900	2,100
<i>Total</i>	<i>79,200</i>	<i>61,700</i>

Source: National Research Center, Puget Sound Clean Air Agency Indoor Wood-Burning Emission Inventory Survey of King, Kitsap, Pierce and Snohomish Counties (2007).

Table 2. Wood Use for Heat in the Nonattainment Area

	Number of Households	Percent
Use wood as primary source of heat	3,446	1.7%
Use wood as “only adequate” source of heat (definition in statute)	unknown	Estimate: 0.02% to 0.46%
Wood is the sole source of heat	600	0.3%

Sources: U.S. Census Bureau, 2005-10 American Community Survey (2010)

Definitions of heat sources and wood burning devices. A wood burner might consider their wood stove to be their home’s “primary source of heat,” even though they have working, non-wood heating equipment that is sufficient to heat the home. According to the 2005-2009 American Community Survey, 1.7 percent of respondents with homes in the nonattainment area consider a wood device to be their primary source of heat.

Washington state regulations define “adequate source of heat” as “the ability to maintain seventy degrees Fahrenheit at a point three feet above the floor in all normally inhabited areas of a dwelling.”

There are a limited number of homes located within the nonattainment area, less than 1 percent, for which a wood stove or wood-burning fireplace insert is the only, or sole, source of heat, which is narrower than “adequate source of heat”. This figure comes from a review of the U.S. Census 2005-2009 American Community Survey, Pierce County property records and the Clean Air Agency’s wood stove replacement program database.

A wood stove is an appliance that is usually made of cast iron, steel, or stone. It can be free standing or made to be installed within the firebox of an existing masonry or metal fireplace.

“Uncertified” refers to older, higher polluting and less efficient conventional wood stoves that were manufactured prior to 1988 when the EPA issued emission standards. The internal design of wood stoves and wood burning fireplace inserts changed significantly in 1988. Any wood stove or fireplace insert can last as long as 40 years, so there are still an estimated 21,200 uncertified wood stoves in operation in the Tacoma-Pierce County nonattainment area. Because of their high emissions, uncertified wood stoves cannot be used during Stage 1 or Stage 2 burn bans.

“EPA-certified” stoves and inserts are much less polluting (up to 50 percent less polluting) and are more energy efficient than older uncertified stoves. In 1988 the EPA issued standards of performance and testing for new wood stoves. New stoves produced or sold in the United States after 1988 had to meet these standards. Additionally, since January 1, 1995, wood stoves offered for sale in the state of Washington must meet an emission limit that is more strict than the EPA standard. Certified wood stoves sold in Washington State must meet an emission standard of 4.5 grams/hour for non-catalytic stoves, and 2.5 grams/hour for catalytic stoves. Certified stoves can be used during a Stage 1 burn ban, and cannot be used during a Stage 2 burn ban.

Pellet stoves are similar in appearance to wood stoves; however, instead of wood, pellet stoves burn a fuel made of ground, dried wood, and/or other biomass compressed into pellets. Because they are solid-fuel burning devices, they must meet Washington State’s emission standards of 4.5 grams/hour for non-catalytic devices and 2.5 g/h for catalytic devices. Pellet stoves are recognized by the EPA and Washington State as the lowest emission solid fuel heaters. They produce 85% less emissions than certified stoves. Pellet stoves can be used during a Stage 1 burn ban, and cannot be used during a Stage 2 burn ban.

B. Implications of Nonattainment to Public Health and Regional Economic Development

Current effects. Not attaining federal air quality standards for fine particle pollution means that in the nonattainment area of Pierce County, the air quality is not as healthy as it should be. The fine particle pollution in the air at certain times of the year poses a serious health risk. A study conducted by Ecology estimates that approximately 1,100 people in Washington die every year because of fine particle pollution.

Nonattainment can also hinder economic development and tourism in the area and wider region. When it wrote the federal Clean Air Act, Congress decided to provide an incentive to communities to clean their air, by putting stricter requirements in for large industries seeking to expand and new large businesses interested in moving to the areas with high pollution. Some large businesses could be required to install additional emission control equipment. These factors might prompt businesses to locate their operations elsewhere. Tourism also might be affected by the perception that the area has “dirty” air.

Consequences of failing to act. If the state does not create a plan for improving air quality that is approved by the EPA (see next section) by December 2012, the Clean Air Act requires EPA to impose its own plan on the area. This plan would not necessarily clean up the problem in the way the community might prefer. Not acting also would endanger federal transportation funding that supports new highway projects, and grant funding for air quality monitoring, planning and control programs, as well as the continued personal and societal costs from the health impacts caused by unhealthy air.

2006 – Health studies cause U.S. EPA to tighten standard for fine particle pollution
2009 – EPA designates Tacoma–Pierce County as a nonattainment area
Summer 2011 – Clean Air Agency convenes Clean Air Task Force
Fall 2011 – Clean Air Task Force makes recommendations to Clean Air Agency
Winter 2011/2012 – Clean Air Agency submits recommendations to Ecology
December 2012 – Ecology submits State Implementation Plan (SIP) to EPA for approval
2014 – Target for Tacoma–Pierce County to reduce fine particle pollution to meet federal standard
2019 – Final deadline to meet federal standard for fine particle pollution

C. Steps Needed

To respond to the nonattainment designation and show how Tacoma–Pierce County will get to cleaner air, Ecology must develop a State Implementation Plan (SIP) and submit it to the EPA for approval by December 2012. The plan must describe how the state will improve air quality to achieve the air quality

standard for fine particle pollution as quickly as possible. The SIP must: (1) define what actions will be taken to control air pollution, (2) describe how these actions will lead to meeting the air quality standard, and (3) project when air quality will meet the standard.

The Puget Sound Clean Air Agency, as the regional air quality regulatory agency with jurisdiction within Pierce County, is working with Ecology to draft the SIP. The Clean Air Agency formed the Tacoma–Pierce County Clean Air Task Force to get advice and ideas from the community about proposed solutions. The goal is to develop a plan that reflects the community’s values.

The SIP for the Tacoma–Pierce County nonattainment area must meet certain requirements in order to show that the actions included will lead to attaining the federal air quality standard. These requirements are:

- Reduce the maximum daily fine particle pollution levels recorded at the Tacoma South L Street monitor to below the federal daily standard of 35 micrograms per cubic meter measured over a 24-hour period. This requires reducing current levels by at least 9 (and possibly up to 11) micrograms per cubic meter on peak fall and winter days.
- Improve air quality as fast as possible. The plan should target attaining the federal air quality standard by 2014 with a possible extension of one to four years (2019) based on the severity of the problem and feasibility of implementing controls. If the target for attainment is after 2014, the area must show it will make substantial progress each year and then actually achieve those targets.
- Address all sources of fine particle pollution.
- Use primarily enforceable actions with measurable results.
- Since public education and voluntary actions are not enforceable and are difficult to measure, the Clean Air Act allows these efforts to account for only up to 6 percent of the total pollution reduction in the SIP. The SIP may contain additional public education and voluntary actions because they will be helpful to achieve attainment, but they may not be considered by the EPA when they approve the SIP.

Only after the air monitoring data indicate that the air quality has improved can the state petition the EPA to redesignate the area from nonattainment to attainment. The EPA can approve the redesignation if the following conditions are met:

1. Air quality monitoring data show that the area meets the federal standard.
2. Reductions in the area’s emissions are permanent and enforceable.
3. The SIP developed for the area has met the requirements of the federal Clean Air Act and has been fully approved by the EPA.
4. The EPA has fully approved a 10-year Maintenance Plan for the area, which Ecology will submit as a revision of the SIP.
5. The area meets the Clean Air Act’s requirements for general SIPs and nonattainment areas.

II. Clean Air Task Force and Its Charge

The Clean Air Agency formed the Tacoma–Pierce County Clean Air Task Force in the spring of 2011. The members were community leaders, elected officials and residents (see list on page ii). The Executive Director of the Puget Sound Clean Air Agency and the Air Quality Program Manager of the Washington State Department of Ecology were nonvoting members. The members were chosen for their expertise and experience in one or more areas that are important to solving Tacoma-Pierce County’s air quality problem. Examples of some of the perspectives included are industry, public health and people who burn wood for heat. The Clean Air Agency engaged John Howell of Cedar River Group to serve as facilitator for the task force meetings and process.

The task force’s objective was to recommend to the Clean Air Agency community-based solutions to bring the Tacoma–Pierce County area into attainment with federal air quality standards. The solutions must reduce emissions from the main sources of fine particulate matter. The full charge to the task force is reprinted below.

Charge to Tacoma-Pierce County Clean Air Task Force

As a task force member, we ask that you actively participate in identifying and evaluating possible solutions to bring the area back into attainment with the federal air quality standard. These solutions need to reduce emissions from the main sources of fine particle pollution: wood stoves and fireplaces, mobile sources (cars, trucks, buses, ships, rail, etc.), and industrial sources. Once possible solutions are evaluated, the group will recommend to the Puget Sound Clean Air Agency those most appropriate for possible inclusion in the state’s plan.

As part of the process, all task force members are asked to:

- Address the problem and consider possible solutions
- Speak as one voice of the people or interest they represent
- Communicate with those you represent between meetings—taking information to them, and bringing their concerns and information back to the task force
- Consider the broad interests of all Pierce County residents who may be affected by poor air quality and the range of possible solutions
- Work to find consensus among the task force members in providing advice and recommendations to the Clean Air Agency

In the task force’s first two meetings, the group developed and adopted a set of ground rules to guide their discussion and decision-making process (see Appendix B). The ground rules included three guiding principles: (1) transparency in creating a thorough and open process, (2) respect for one another’s perspectives, and (3) commitment to recommending the best solutions for Pierce County. The ground rules also provided that the task force would operate by consensus, with the goal of reaching unanimous consensus, meaning that all members could support or live with the task force

recommendations. If the task force could not meet unanimous consensus, the differences of opinion were to be noted and included as part of the task force's final recommendations.

III. Task Force Process for Developing Recommended Solutions

The Tacoma–Pierce County Clean Air Task Force met a total of 11 times—monthly from May through August 2011, and twice a month from September through November, with a final meeting in December. The initial meetings focused on developing an understanding of air quality issues in Tacoma and Pierce County, the nonattainment designation by EPA and the requirements for responding to this designation.

Starting in June, the task force worked to answer three questions: What are possible solutions for reducing fine particle pollution? How do we assess what the best solutions are for Tacoma–Pierce County? What solutions do we recommend? The task force's discussions produced a list of more than 60 possible solutions and a set of evaluation criteria. The agency staff then applied initial technical modeling to the list of possible solutions in order to narrow the possibilities to those that could produce meaningful reductions of fine particle emissions. Then the task force used the evaluation criteria to identify the solutions with the best fit for the community. Based on these evaluation steps, the task force developed its recommendations. The figure below shows a graphical representation of this process.

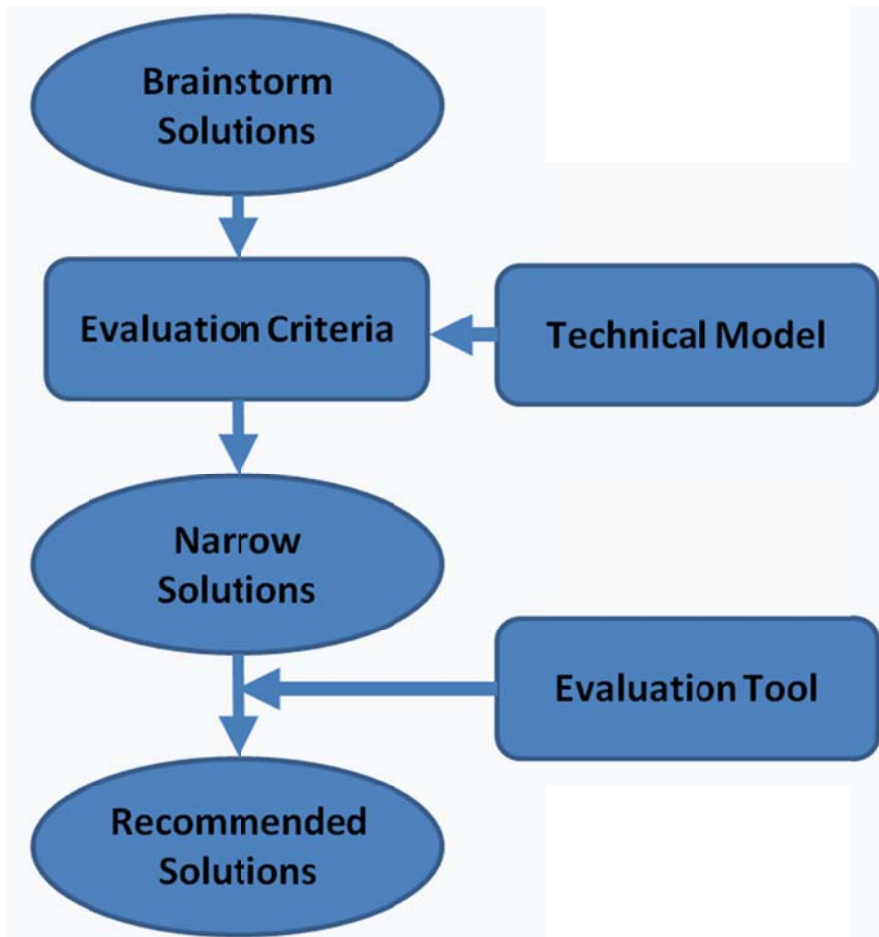


Figure 7. Process for Developing Task Force Recommendations

Note: The “Technical Model” in this graphic refers to a screening tool used by the task force. It is not the official model that will be used in the SIP.

A. Evaluation Criteria and Tools

Staff from Ecology briefed the task force on the evaluation criteria that the federal Clean Air Act requires the state to consider when developing a state implementation plan for fine particle pollution. These are that the solutions must be: reasonable, technically feasible, economically feasible, timely, and enforceable.

In addition to these criteria, the Clean Air Agency encouraged the task force to develop criteria that reflect the community’s values and interests. The task force developed possible criteria at its June meeting, and revised and approved them in July. The Clean Air Agency staff recommended which criteria the agency should evaluate (those requiring technical expertise) and which criteria the task force members should evaluate (those requiring judgments from the community’s perspective). Some criteria were evaluated by both the staff and the task force.

The table below lists all the evaluation criteria, the definition for each criterion, who developed the rating for each one, and what the rating method was. For the criteria that did not have a numeric measurement, the Clean Air Agency and task force agreed to rate by asking the question *How well does*

the solution meet each criterion?, with the rating scale of very well (V), somewhat/mixed (S), and not well (N).

Table 4. Evaluation Criteria and Ratings Used to Assess Potential Solutions

Criterion	Definition	Who Rated	Rating Scale
Winter Day Ambient Concentration (Fine Particle Reduction)	Consider how effectively the solution will reduce fine particle pollution concentrations in the air during periods of nonattainment.	PSCAA	Micrograms per cubic meter by 2014 and 2019
Emission Reduction	Reductions in the amount of emissions emitted from the sources.	PSCAA	Tons of PM _{2.5} reduced, and percent of the reduction needed to reach attainment
Economically Feasible*	Cost is reasonable for the amount of reduction.	PSCAA	\$ per ton in cost
Implementation	Can be implemented effectively. There is a commitment to implement/enforce. There is adequate authority to implement.	PSCAA	Very well (V), somewhat/mixed (S), and not well (N)
Maintainability	Will improve air quality over time. Addresses the underlying cause of poor air quality.	PSCAA and Task Force	V, S, N
Cost and Benefit	The cost of the solution is commensurate with the air quality benefits that will be achieved.	Task Force	V, S, N
Public and Political Acceptance	There will be sufficient public and political support for the solution.	Task Force	V, S, N
Economic Well-Being of the County	Will enhance the economic development potential for Pierce County.	Task Force	V, S, N
Minimize Burden on Vulnerable Communities and Populations	Will minimize the economic burden on individuals and households.	Task Force	V, S, N
Minimize Unintended Consequences	Will minimize the likelihood of unintended consequences.	PSCAA and Task Force	V, S, N
Funding Availability	There is reasonable likelihood that funding needed to carry out the solution will be secured.	PSCAA	V, S, N
Technically Feasible/Sound*	The solution can be put into practice. Emissions can be measured or quantified.	PSCAA	V, S, N
Timing/Timely*	How quickly the solution will produce reductions. Will enable Pierce County to meet the federal timeline, establish a basis for appropriate next steps and reach attainment by 2014 (at the latest, 2019).	PSCAA	V, S, N
Enforceable*	Will be independently verifiable. Has defined violations. Can identify liable person. Enforceable as a practical matter	PSCAA	V, S, N

Criterion	Definition	Who Rated	Rating Scale
Reasonable* (encompasses all the other criteria)	Not absurd, impractical, unenforceable, or severely disruptive socioeconomically. Focuses on significant emission reductions.	PSCAA	V, S, N (assessed based on all other criteria)

*Criterion required by the federal Clean Air Act

The task force members each used an evaluation tool to provide their ratings of each major solution. These results were rolled up into the master evaluation tool (see Appendix C).

B. Potential Solutions

At the July and August meetings, the task force learned about solutions that other cities and counties across the country are using to reduce fine particulate pollution, and brainstormed possible solutions for use in Tacoma and Pierce County. This process produced a list of 66 potential solutions. Clean Air Agency staff grouped the list into four broad categories: wood smoke emissions, vehicle emissions, other sources of emissions, and public education and outreach.

The staff then reviewed the solutions in terms of their potential to reduce the level of fine particle pollution in the area, and grouped them in four categories (see Appendix D). The four categories were:

1. Major Reduction Potential Solutions – four solutions with the potential to reduce fine particle pollution by 0.5 micrograms per cubic meter or more:
 - A. Require removal of uncertified stoves by a date certain, with only non-wood burning devices allowed as replacements
 - B. Require removal of uncertified stoves by a date certain, with certified stoves allowed as replacements
 - C. Require removal or changeout of uncertified stoves at time of sale of the home
 - D. Increase capacity to enforce burn bans
2. Supplemental Solutions – 21 solutions that would not achieve very much reduction by themselves or presented other complications when used alone, but if combined with one of the “major reduction” solutions, could help to boost the reduction of that solution.
3. Low Reduction Potential Solutions – 14 solutions that would not reduce fine particle pollution by very much or had other limitations. Task force members requested that Clean Air Agency staff evaluate the following three of these solutions:
 - L1. Explore filtering technology for wood burning devices to determine if it is effective and affordable
 - L3. Lower the threshold for calling the second stage of burn bans in the nonattainment area (from 25 micrograms to 20 micrograms)
 - L9. Auto trade-out program for bikes and/or fuel efficient autos

The rest of the Low Potential solutions were not taken off the table, but were not included in the evaluations.

4. Public education and outreach — 14 solutions. While recognizing these could be an important part of the solution, the federal Clean Air Act allows these efforts to account for only up to 6 percent of the total pollution reduction in the SIP. Additional public education and voluntary actions will be necessary to achieve attainment, but may not be considered by the EPA when they approve the SIP.

C. Focusing the Solutions

The Clean Air Agency staff provided the task force with an evaluation of each of the four major reduction solutions separately and combined with supplemental solutions. In discussion, the task force members suggested some possible changes in the solution packages. The solutions the task force and agency staff reviewed were as follows:

- Time of Sale Removal or Decommissioning of Uncertified Wood Stoves and Inserts:
 - Time of sale solution
 - Time of sale solution, with inspections and incentives
 - Time of sale solution, adding decommissioning also for fireplaces, with inspections and incentives
- Enhanced Burn Ban Enforcement:
 - Enhance enforcement by adding significant personnel capacity during burn bans
 - Combined solutions for enhanced enforcement:
 - implementing a registration program
 - enforcing based on visible smoke standard, rather than illegal smoke density
 - adding enforcement personnel beyond the initial addition
 - modifying when a burn ban is called (modifying the “triggers”) to reduce the number of impaired air quality days
 - enforcing the ban more effectively during evening hours
 - increasing advertising
 - increasing education and outreach
- Date Certain Removal of Uncertified Wood Stoves and Inserts with a Variety of Options:
 - Date certain removal, and restrict replacements to non-wood sources; registration program
 - Date certain removal, and allow certified wood stoves as replacements; registration program
 - Date certain removal, and allow pellet stoves (pellet stoves are significantly lower in emissions) or a wood stove with emissions equivalent to a pellet stove as replacements; registration program

D. Evaluation of Solutions

Once the list of potential solutions had been narrowed to those that have the greatest potential to reduce fine particle emissions, the task force used several steps to review, discuss, and evaluate each of the potential solutions. The process involved the following:

- Presentation of a description of each proposed solution, including appropriate background information, as needed
- Review and discussion of the key assumptions used to conduct the evaluation of each solution, and the results of the technical modeling based on those assumptions
- Review and discussion of staff’s assessment of the evaluation criteria (described earlier) they were asked to rate, and task force assessment of the evaluation criteria they were asked to rate
- Additional review and discussion of each solution after recommended revisions to the key assumptions and associated revisions to estimated modeling outcomes
- Development of recommendations

In order to conduct a thorough evaluation of each solution, a number of assumptions had to be made about how the solutions would be implemented. For example, the assumptions included estimates regarding the rate of compliance for each solution (the percentage of the public who would follow a new rule, regulation or procedure), the staffing levels needed for implementation, or the administrative and capital costs required for implementation. Those assumptions were used to inform the technical modeling carried out by the Clean Air Agency staff to estimate how much pollution reduction could be achieved by each solution and over what period of time that reduction would occur. The assumptions were also used to estimate the total cost of each solution (including an estimate of the potential costs borne by homeowners and the community).

In its September and October meetings, the task force reviewed and discussed the assumptions for each of the major solutions. A number of revisions were suggested based on the task force members’ expertise or assessment of community values. Agency staff then revised the key assumptions and presented to the task force any changes in the estimated levels of pollution reduction or costs.

In addition, Clean Air Agency staff was asked to develop a tool that would allow the task force to understand how quickly a combination of solutions could achieve progress toward meeting or exceeding the federal air quality standards. Figure 8 represents the “Progress Meter” used by the task force. The meter included three dates: 2014, which is the target established by the Clean Air Act for communities to reach attainment; 2019, which is the latest a community is allowed to achieve attainment; and 2017, a mid-term date that allowed the task force to measure estimated progress toward meeting the federal standard prior to the end-date of 2019. The meter also included two potential reduction goals: a minimum reduction of 9 micrograms per cubic meter to meet the federal daily standard and would bring Tacoma and Pierce County into attainment, or a reduction of 19 micrograms per cubic meter to meet an air quality health goal established several years ago for the entire region by the Puget Sound Clean Air Agency Board. Agency staff indicated that the progress meter is a preliminary tool. Ultimately Ecology will be continuing technical analysis of recommended solutions for the SIP, so the amount of gains from [individual or collective solutions could change in the final SIP.](#)

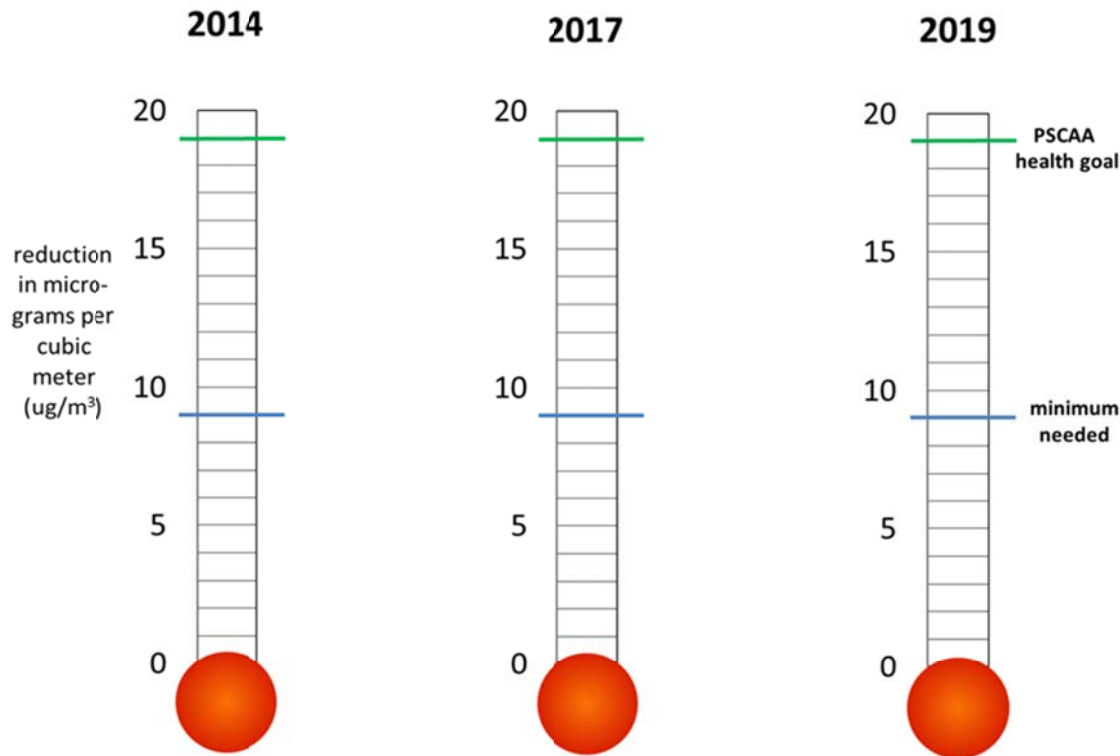


Figure 8. Example of a Progress Thermometer

The blue lines signify the minimum reduction needed to demonstrate attainment. The green line is the Agency health goal.

Time of Sale Removal or Decommissioning of Uncertified Wood Stoves and Inserts

Solution Description: This solution was based on an Oregon statewide program in which uncertified wood stoves and inserts were required to be removed, decommissioned, or changed out at the time a house is sold. The transaction of selling a home provides a point in time and an established process (an inspection prior to the closing of a sale) when uncertified stoves and inserts could be identified and removed. The Oregon program was adopted in 2009 and effective in 2010, so there are limited data to evaluate the effectiveness of the new program.

Selected Key Assumptions():*

- The rate of annual home sales in Pierce County is 2 percent to 3 percent of all homes. This is based on the Pierce County Assessor-Treasurer’s reports from 2008 to 2010.
- Sixty percent of homes sold in Pierce County will comply with this requirement. The Oregon program estimated a 75 percent compliance rate, but there is not significant data yet to confirm their rate of compliance.
- This solution would result in an annual removal rate of uncertified wood stoves and inserts of 1.2 percent to 1.8 percent.

- The cost of removing an uncertified device would be approximately \$350 for a freestanding wood stove and \$1,200 for an insert.

Evaluation Conclusions()*: The technical analysis concluded that this solution would result in the following:

- A reduction in fine particle pollution of about 0.32 micrograms per cubic meter by 2014 (less than 5 percent of the minimum reduction needed); and a reduction of 1.0 micrograms per cubic meter by 2019 (about 10 percent of the minimum reduction needed).
- A total cost per microgram per cubic meter for this solution was estimated at between \$1.8 million and \$2.1 million by 2014, and between \$1.7 million and \$1.9 million by 2019.

Task force members expressed several concerns about this potential solution. A primary concern was that it is a solution that would be focused on one relatively small segment of the population—those individuals selling and purchasing homes—to solve a community-wide issue. Task force members felt it would be inequitable to single out those households to reduce fine particle emissions, since they represent a small portion of the total number of homes using uncertified wood stoves and inserts. This would also place a requirement on households that have an uncertified device, even if the device was not used to burn wood.

In addition, task force members expressed concern about relying on this solution in a highly uncertain and weak real estate market. There was concern that additional requirements placed upon home sales could weaken the recovery of the already soft real estate market. Finally, given the need to make substantial progress toward cleaner air, task force members said they were concerned that the current annual rate of home sales of 2 percent to 3 percent would not result in significant reduction of fine particle pollution.

(*) For a complete list of assumptions and agency evaluation conclusions, see Appendix E.

Enhanced Burn Ban Enforcement

Solution Description: In order to consider modifications to the ways in which burn bans could be enforced in Tacoma and Pierce County, the task force had to understand the current law and practice regarding the use of burn bans. Washington state law allows local agencies to restrict the use of residential wood burning devices to protect public health when air pollution levels rise. The law stipulates the use of a two-stage burn ban. A Stage 1 burn ban is issued on the basis of weather conditions and a forecast of rising pollution levels. A Stage 1 ban is issued when a forecast estimates that fine particle pollution will exceed 35 micrograms per cubic meter (the federal daily standard) within 48 hours. During a Stage 1 burn ban, only households with EPA certified wood burning devices or pellet stoves, or households whose wood stove or insert is their only adequate source of heat (including uncertified wood stoves or inserts), can burn.

A Stage 2 burn ban can be issued when fine particle pollution reaches certain trigger levels established in state law. A Stage 2 burn ban is issued in one of two ways: (1) if a community is already in a Stage 1 burn ban and fine particle levels are above 25 micrograms per cubic meter and are forecast not to drop below that level for at least 24 hours, or (2) if a Stage 1 burn ban has not been called but fine particle

pollution levels are above 25 micrograms per cubic meter and are forecast to exceed 35 micrograms per cubic meter within 24 hours. During a Stage 2 burn ban, only households who have no other adequate source of heat can burn wood. During both a Stage 1 and Stage 2 burn ban, outdoor burning is prohibited.

During the past 10 years (2000 – 2010), 17 fall and wintertime burn bans have been issued by the Clean Air Agency for Pierce County. This represents an average of six days per year during the months of November through February. However, since the federal daily standard for fine particle pollution was strengthened in 2008 (reducing the acceptable air quality standard from 65 micrograms per cubic meter to 35 micrograms per cubic meter), it can be reasonably assumed that without further actions the average number of burn ban days per year will increase.

The Clean Air Agency issues and enforces the burn bans. It has an enforcement staff of between eight and 12 people who operate in two-person teams, and are responsible for air quality enforcement in King, Kitsap, Pierce, and Snohomish counties. Enforcement of burn bans is currently conducted primarily during daylight hours because the light better allows inspectors to observe the opacity (density) of the smoke or visible emissions rising from chimneys. In the last burn ban (December 2010 – January 2011) 10 notices of violation were issued in Pierce County for violation of the ban.

Enhanced enforcement of burn bans would include the following features:

- Substantially increase the number of personnel to enforce burn bans.
- Change the standard used by enforcement personnel from opacity (smoke density) to visible smoke. This will allow personnel to observe more homes and issue more notices of violation if those violations are occurring ([an opacity violation can be issued only after a home is allowed twenty minutes for start-up, when smoke is more dense, and then must be viewed for at least six minutes by an inspector trained as a certified smoke opacity reader](#)).
- Explore technologies that would better enable personnel to enforce burn bans during evening hours (including exploration of possible use of infrared viewers and cameras).
- Enhance community outreach and education to better inform residents about proper wood burning practices and the importance of observing burn bans.
- Increase the amount of advertising and public awareness efforts to better inform residents about the issuance of a burn ban.
- Maintain use of the two-stage burn ban, and make changes as necessary to burn ban “triggers” that would better enable burn bans to avoid exceedances of the standard.
- Provide assistance for low-income households so they are not forced to spend limited resources on more expensive forms of heat during a burn ban.
- Create a registration program for owners of all certified and uncertified wood stoves and inserts. This will enable enforcement personnel to focus their efforts on those homes that are in violation of a burn ban (e.g., they would know which homes use wood stoves or inserts as their only adequate source of heat, or which homes have certified stoves or inserts that are allowed to burn during a Stage 1 burn ban).

- Establish a meaningful initial fine that could be reduced or eliminated if the resident agrees to participate in training regarding burn bans and proper wood burning practices or change to a cleaner source of heat.

Selected Key Assumptions():*

- Three quarters of those who receive a civil penalty for violating a burn ban will not burn again during a burn ban.
- Inspection personnel will be ramped up over the first three years, resulting in potentially 4,000 notices of violation being issued in Year Three.

Evaluation Conclusions():* The technical analysis concluded that this solution would result in the following:

- Based on the program changes described above, it is estimated that enhanced enforcement of burn bans could achieve a reduction in fine particle pollution of about 1.4 micrograms per cubic meter by 2014 (less than 20 percent of the minimum reduction needed); and a reduction of 6.8 micrograms per cubic meter by 2019 (approximately 70 percent of the minimum reduction needed).
- A total cost per microgram per cubic meter for this solution was estimated at \$1.2 million. That is approximately \$1.3 million dollars per year in societal costs (including civil penalties to homeowners and program administrative costs).

The task force felt that this potential solution would be effective because it would focus action during the days of the year when fine particle pollution in Tacoma and Pierce County exceeds the federal air quality standards. The solution also builds on an existing regulation (issuance of burn bans) that is familiar to many residents. This solution was felt to be timely (air quality improvements could occur as soon as enforcement is increased), technically feasible, and enforceable. The task force discussed a number of potential implementation challenges (i.e., ramping up and training the number of personnel required to enhance enforcement, securing technology to accomplish better evening enforcement, the need to include considerable public education along with enhancing enforcement of burn bans, and others), but concluded that these challenges could be solved and that the solution could achieve results in the near-term and over time.

(*) For a complete list of assumptions and agency evaluation conclusions, see Appendix E.

Date Certain Removal of Uncertified Wood Stoves and Inserts

Solution Description: Wood stoves and inserts manufactured prior to 1988 (as described earlier in this report) produce more pollution and are less efficient than more modern devices. The older stoves and inserts made prior to 1988 are called uncertified devices. Since wood burning devices can last for 40 years, there are still a considerable number of older uncertified wood stoves and inserts in use. It is estimated that there are 24,200 uncertified wood stoves and inserts in the Tacoma-Pierce County nonattainment area, and 21,200 are estimated to be in use. This solution would set a date (or dates) when uncertified wood stoves would be required to be removed from homes in the nonattainment area.

In 2009, the Washington State Legislature provided the authority³ to prohibit the use of uncertified stoves and inserts in nonattainment areas if it could be demonstrated that the wood smoke was found to be part of the air pollution problem, and if there were a program to assist low-income residents in complying with the regulations. In addition, the legislation exempted residents for whom an uncertified device is their only adequate source of heat. Given the percentage of pollution from wood smoke, the first condition can be met and this solution presumes that the other conditions will be included in the Tacoma–Pierce County nonattainment area.

The task force discussed several alternatives for phasing in a requirement to remove uncertified wood stoves and inserts over a several year period. However, the task force felt that establishing one clear date when all residents will have to remove their uncertified device was preferable to having multiple dates affecting multiple categories of residents. They also felt it would be important to offer a combination of “carrots and sticks” (e.g., incentives for those who remove their uncertified device before the deadline, and stiffer fines for failing to remove until after the deadline) to encourage removal in a phased fashion. The proposed date when all uncertified wood stoves and inserts would have to be replaced is August 31, 2015.

This solution would include provisions to accommodate low-income households and those whose uncertified device is their only adequate source of heat. Assistance to low-income households could take several forms, including: financial payments to remove uncertified devices; providing additional time to meet the removal requirement; assistance with payment of bills for other heat sources; and/or leveraging of home weatherization programs to insulate homes to reduce all heating costs.

Although this solution is focused on the removal of uncertified devices, one of the factors affecting the estimated level of pollution reduction is the kind of heating device that could be installed after the uncertified wood stove or insert is removed. The task force felt that residents should be able to install any approved method of heating, including certified wood stoves or inserts.

The task force also discussed the level of confirmation that would be utilized to determine if and when uncertified stoves and inserts were being removed. Three levels of confirmation were considered: low, medium, and active. Low confirmation would include outreach and incentives and wouldn’t include meaningful ways to confirm removal. This level of confirmation would not meet EPA requirements of enforceability. The medium level of confirmation would include some ways to confirm removal. Examples are requiring GPS-marked photos provided by homeowners to provide certainty that uncertified devices had been removed, and increased fines for burning with an uncertified stove or insert during a burn ban. The active level of confirmation would include inspections in homes to confirm removal. The task force felt that home inspections would be considered intrusive by the community

This solution could include the creation of a registration program for owners of all certified and uncertified wood stoves and inserts. The registration could be used for both the enhanced burn ban enforcement and the removal of uncertified devices. Registration would be phased in over time and would be accomplished mostly with a system of online registration. Registration of all wood burning

³ The authority to do this as a contingency measure already existed.

stoves and inserts would allow the Clean Air Agency to track the progress and target efforts being made toward the removal of all uncertified wood stoves and inserts.

Selected Key Assumptions():*

- The number of uncertified wood stoves and inserts that would be removed per year is estimated at 1,000.
- The compliance rate (the percentage of all owners of uncertified devices who will remove their uncertified wood stove or insert) by the deadline is estimated to be 33 percent by 2019. This allows for an exemption for adequate source of heat.
- Fifty (50) percent of those who remove their uncertified device would replace that device with a certified wood stove or insert.
- Financial assistance (\$500) would be provided to remove certified stoves, and an additional \$500 incentive would be provided for early removal.

Evaluation Conclusions():*The technical analysis concluded that this solution would result in the following:

- It is estimated that date certain removal of uncertified wood burning stoves and inserts could achieve a reduction in fine particle pollution of about 0.7 micrograms per cubic meter by 2014 (less than 10 percent of the minimum reduction needed); and a reduction of 2.5 micrograms per cubic meter by 2019 (more than 25 percent of the minimum reduction needed).
- A total cost per microgram per cubic meter for this solution was estimated at \$5 million.

The task force concluded that this solution would improve air quality over time and address one of the underlying causes of fine particle pollution. This solution is technically feasible, and with a balance of “carrots and sticks,” it could begin to accomplish pollution reduction quickly. The task force did express concern about the level of public and political acceptance this solution would achieve. There are some in the community who will be opposed to limitations on their options for heating their home, or who object to the potential cost to replace the uncertified device with another stove or insert.

(*) For a complete list of assumptions and agency evaluation conclusions, see Appendix E.

Reductions in Other Sources of Pollution

Solution Description: As mentioned earlier in this report, combustion from residential wood burning accounts for over half of the fine particle pollution on peak fall and winter days in the Tacoma–Pierce County nonattainment area. However, several other sources contribute to the winter-time pollution: gasoline vehicles, industry, diesel vehicles, ships, and other miscellaneous sources. (See Figure 4, above.) Each of these other sources contributes significantly less to wintertime fine particle pollution than wood smoke: gasoline vehicles (20 percent), industrial sources (10 percent), diesel vehicles (5 percent), and ships (4 percent). Although no single source contributes more than 20 percent, there are a number of actions being undertaken to reduce fine particle pollution from these other sources.

Gasoline Vehicles

Nationally, the focus for reducing fine particle pollution related to gasoline vehicles has been on creating cleaner standards for both engines and fuels. The State of Washington has adopted the California Clean

Car Standards for vehicles, the most stringent automobile standards in the country. As the old fleet of vehicles is retired from the road and the newer, cleaner vehicles replace them, the new standards will have a positive impact on reducing fine particle pollution. This trend is partially offset by the anticipated increase in population growth, which will result in more drivers on the road. In addition, local governments have adopted several programs to reduce fine particle pollution related to gasoline engines: Pierce County, the City of Tacoma, and Tacoma Public Utilities have installed 20 electric vehicle charging stations in the area, and have purchased electric vehicles. Anti-automobile-idling programs have been adopted for schools, Washington State Ferry loading areas and for some public fleets.

The regional transportation plan adopted by the Puget Sound Regional Council has several policy goals that will help reduce fine particle pollution:

- Focus population and economic growth in urban centers and compact communities.
- Improve efficiency through better signal coordination, active traffic management, and traveler information.
- Implement strategic capacity investments in transit, roadways, and non-motorized improvements.

In support of these policy goals there are a number of transportation capital investments planned in the nonattainment area between now and 2019. Those improvements include the following: HOV lane extensions on I-5 and SR 16, ramp metering on I-5 in the Joint Base Lewis-McCord area, Sounder (commuter rail) improvements from Tacoma to Lakewood, and selected bicycle lanes, sidewalks and trails to encourage alternative means of travel.

Diesel Vehicles

There are new federal standards for diesel engines and fuel. The new standards for cleaner engines apply to a wide range of diesel engines, including cars, trucks, locomotives, and marine. Cleaner diesel fuel standards have been phased in during the past several years: 2007 for on-road vehicles, 2010 for off-road vehicles, and 2012 for locomotive and marine fuel. However, Tacoma Rail, the Port of Tacoma Terminal Locomotives, and the Washington State Ferries are already using fuel that meets the newer standards. There are also several programs adopted by local jurisdictions to reduce emissions from diesel vehicles and equipment, including: 93 percent of Pierce County school buses and more than 140 City, County and Port vehicles equipped with exhaust control equipment; the Port of Tacoma's and Tacoma Rail's locomotive idle-reduction program; use of biodiesel by all of the City of Tacoma diesel fleet; and trading out all trucks older than 1994 for cleaner vehicles by the City of Tacoma. The Port of Tacoma has also implemented a program that only allows trucks with 1994 or newer engines to enter the Port.

Industrial Sources

Among the industrial sources of fine particle pollution in the nonattainment area, there are six sources that have been identified by Ecology and the Clean Air Agency as the largest industrial emitters of fine particle pollution. Collectively, these six sources contribute more than 90 percent of the total fine particle pollution from industrial sources in the nonattainment area. The federal Clean Air Act establishes a requirement for working with industries to reduce their levels of pollution called

Reasonably Available Control Technology (RACT). The requirement stipulates that pollution control technology for industries must be available, reasonable to install, and cost effective to install and operate. Engineers and inspectors from Ecology and the Clean Air Agency have been working with Tacoma and Pierce County industries for the past 40 years to reduce pollution emissions. Engineering staff at Ecology and the Clean Air Agency are currently conducting a review of existing pollution controls and operations at the six largest industrial sources to determine if they meet RACT. A preliminary analysis indicates that most if not all of the sources do.

Ships

New international standards require that ocean-going ships use lower sulfur fuel, beginning in 2012 and moving to a much stricter levels by 2015. These cleaner fuels will reduce the fine particle pollution from ships. The Port of Tacoma has also installed shore power facilities at their TOTEM Ocean Express Terminal so that ships can use shore power instead of operating their engines to create power when at berth.

Selected Key Assumptions:

- Older cars will retire and be replaced by newer ones.
- Over \$5 billion in transportation-related investments that will help reduce fine particle pollution will occur by 2019.
- Ship emissions will decrease between 2012 and 2015 due to cleaner fuel requirements.

Evaluation Conclusions:

- The new standards for cleaner gasoline cars and newer cars on the road are estimated to achieve a reduction in fine particle pollution of 1.3 micrograms per cubic meter by 2014, and 1.5 micrograms per cubic meter by 2019.
- The federal standards for cleaner diesel engines and both diesel and marine fuels are estimated to achieve a reduction in fine particle pollution of 0.5 micrograms per cubic meter by 2014, and 0.6 micrograms per cubic meter by 2019.
- The new standards for large ship fuel are estimated to achieve a reduction in fine particle pollution of 0.4 micrograms per cubic meter by 2014, and 1.1 micrograms per cubic meter by 2019.
- Investments in regional transportation projects to improve traffic flow and provide alternative forms of transportation are estimated to achieve a reduction in fine particle pollution of 0.4 micrograms per cubic meter by 2019.

Together the anticipated reductions from emission sources other than wood smoke are estimated to achieve approximately one-quarter to one-third of the reductions needed (2 – 3 micrograms) to reach the federal air quality standard by 2019. Most of the emission reductions from these other sources of fine particle pollution will come from changes in federal standards for more efficient engines and cleaner fuels. However, while the range of local initiatives does not add a significant amount to the estimates of emission reduction in the nonattainment area, reductions in these sources will contribute to the overall plan.

IV. Public Outreach and Input

The Clean Air Agency conducted significant public outreach on Tacoma-Pierce County fine particle nonattainment. Outreach activities had two primary purposes: to raise general awareness of the issues and to gather public input on the draft pollution-reducing strategies under consideration by the task force. Because of the likely impacts from future implementation of wood smoke reduction programs, special emphasis was given to reaching members of the community who burn wood for heat.

Public outreach was conducted throughout the task force process, but was concentrated during October 2011. Activities included:

- **Public open houses** – Two public meetings were held in the nonattainment area (Tacoma, October 20; Puyallup, October 24). Approximately 200 people attended all together.
- **Online survey** – Public input was invited via an online survey at www.cleanairpiercecouny.org. More than 400 comments were submitted between October 5 and November 30.
- **Direct mailing** – Postcards were sent to all households within the nonattainment area (~220,000 households) announcing the public open houses and requesting input online or by telephone. Approximately 50 people responded to the postcard by phone. An additional 10 responded by U.S. mail.
- **Print and online advertising** – The public open houses and online survey were advertised in all of the major print media within the nonattainment area, in one Spanish-language weekly, on Joint Base Lewis-McChord, and on the Tacoma News Tribune website. Additionally, more than 4000 posters and flyers were distributed in public locations within the community.
- **Outreach to community groups** – Clean Air Agency staff and partners gave presentations and briefings to more than 30 neighborhood coalitions, city and county councils, state and federal elected officials, and other community groups. Clean Air Agency staff also participated in community events focused on health impacts, emergency preparedness, and other relevant topics.

Feedback was requested on three draft pollution-reducing strategies: enhanced enforcement, removal of uncertified devices at date certain (“date certain”), and removal of uncertified devices at the time a home is sold (“time of sale”). All comments received were categorized according to four levels of overall support for the strategy: full support, qualified support with economic concerns, qualified support with concerns about balanced implementation, and full opposition.

Overall, the majority of respondents indicated full or qualified support for all of the strategies proposed. The primary public concern about enhanced enforcement was that implementation should be balanced and reasonable. For date certain and time of sale removal, the primary concern was about economic impacts to individual households, both due to the cost of removing uncertified devices and ongoing heating costs.

Four major themes were common across all of the public input submitted. There were strong concerns about the economic impacts of potential pollution-reducing strategies on individual households, particularly low- and fixed -income families . A large proportion of people expressed concerns about the

impacts of wood smoke on their health and in their neighborhoods. . A smaller number of comments expressed disbelief that wood smoke is a significant source of pollution, as well as concern that efforts to address wood smoke are intrusive and a waste of taxpayer money.

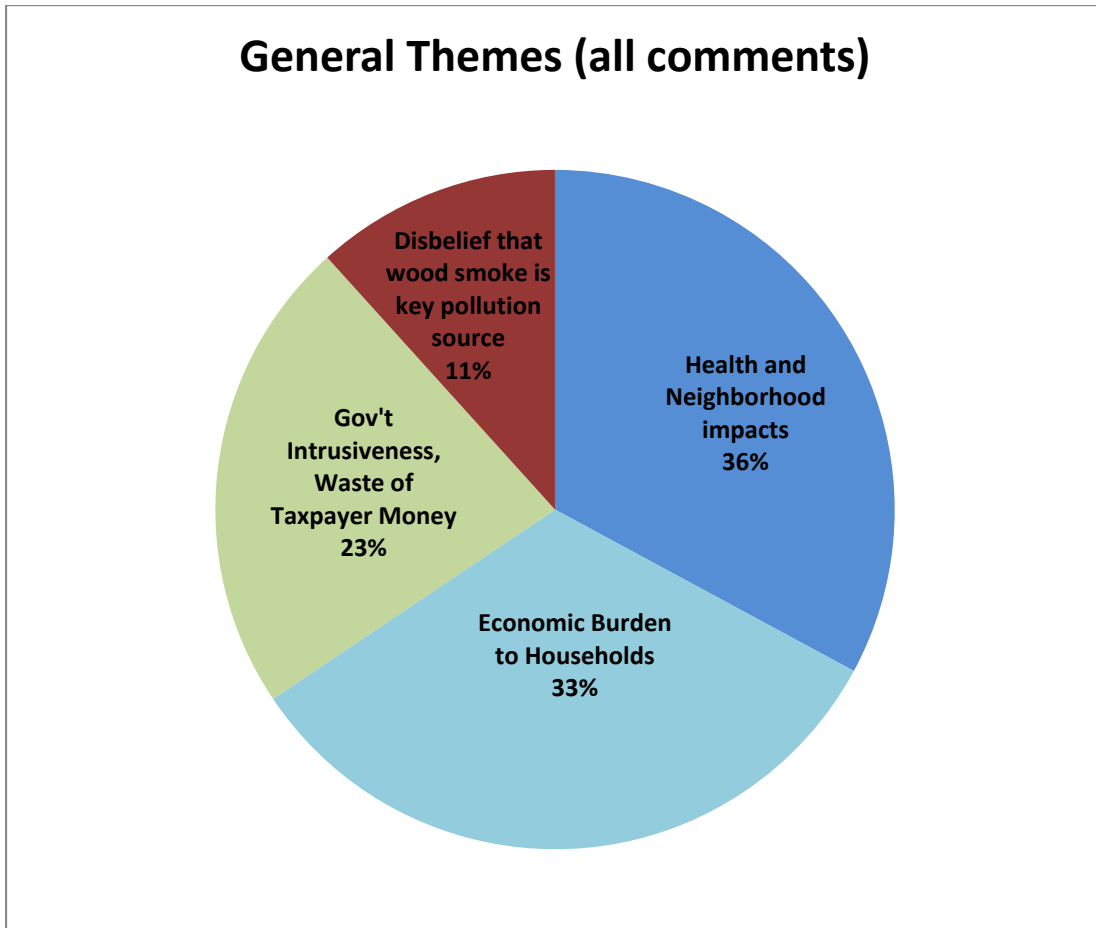


Figure 9. Overarching Themes from Combined Online, Public Open House, and Telephone Comments

Four major themes were common across all of the public input submitted. In a number of cases, individuals expressed both support for and concerns about the proposed solutions.

All public input was compiled and provided to the task force for its consideration, as well as posted online at www.cleanairpiercescounty.org. Further public outreach will be done on issues related to burn bans, health impacts of wood smoke, clean burning practices, and other topics as the state implementation plan is completed and implemented.

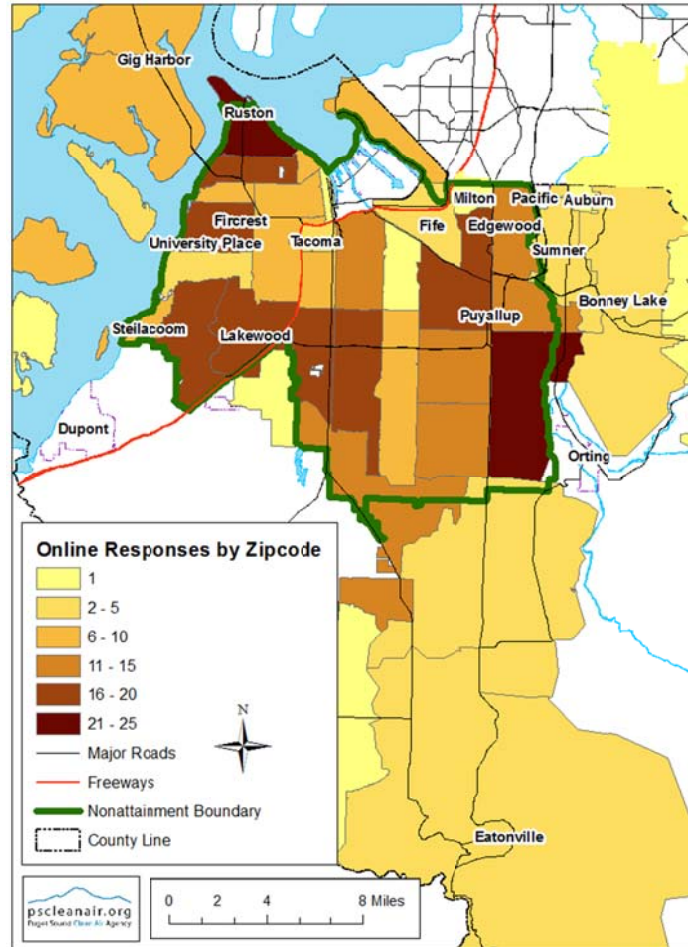


Figure 10. Location of Online Survey Respondents by ZIP Code

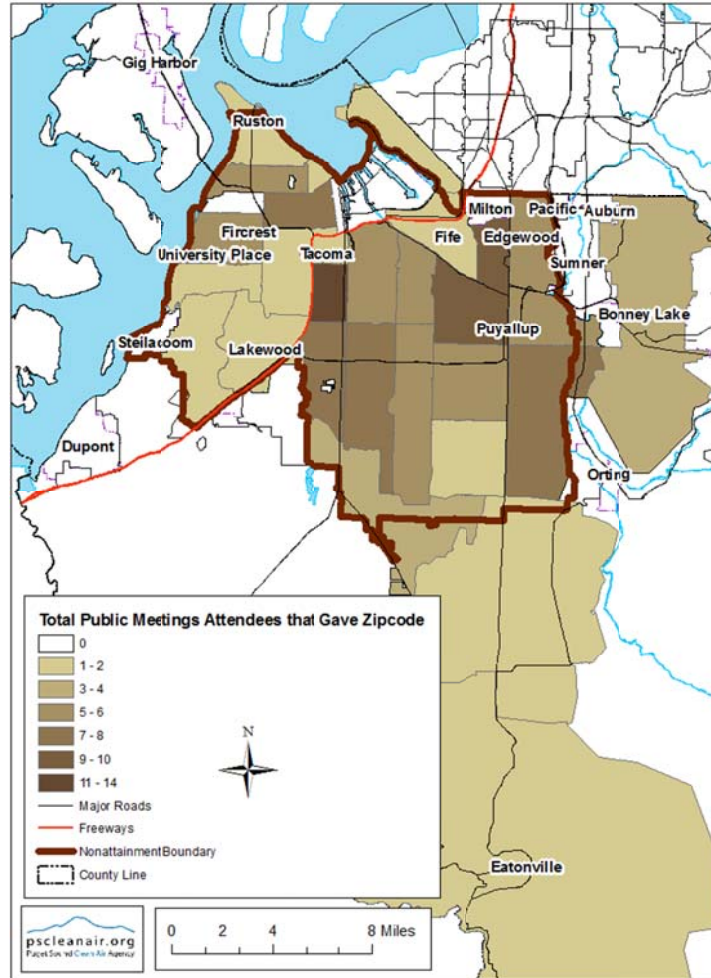


Figure 11. Location of Public Open House Attendees by ZIP Code
(note: not all meeting attendees provided ZIP code information)

V. Recommended Solutions and Principle Statements

No single solution would enable the Tacoma-Pierce County nonattainment area to reduce fine particle pollution sufficiently to achieve the federal air quality standard. The task force is recommending use of a combination of strategies to improve air quality in a timely manner and to help the area get back into attainment. The three main strategies recommended by the task force are:

1. Enhanced enforcement of burn bans
2. Establishment of a date certain for removal of uncertified wood stoves and inserts
3. Implementation of the range of strategies to reduce fine particle pollution for gasoline vehicles, diesel vehicles, industries and ships.

As mentioned in the Evaluation Section of this report, approximately one-quarter to one-third of the emission reductions needed to meet the fine particle pollution standard by 2019 will be accomplished from new federal regulations and local initiatives related to non-wood smoke sources of pollution. Since

wood smoke represents more than half of the fine particle pollution on peak winter days, the task force focused most of its time discussing recommendations regarding ways to reduce wood smoke.

The task force discussed numerous variables with respect to the design of the recommended solutions. However, it realized that circumstances may change as implementation plans are developed. (For example, there is uncertainty about the amount of funding to implement these solutions.) As a result, the task force recommendations include a combination of suggested program design features, and statements of principle that it suggests be used to guide the future implementation of these solutions.

Overarching Principle Statement

- All residents and communities in the nonattainment area should contribute to the solution. We're all in this together.

Common Principles for Implementing All Solutions

- Education efforts are a key component to ensure effective implementation.
- Outreach should be broad-based and include groups that are less likely to receive notice or support.
- Individual strategies should be consistent and complement other strategies.

A. Enhanced Burn Ban Enforcement

Goal: Ensure that those who are contributing the most to the fine particle pollution during periods of the poorest air quality, reduce their emissions.

The task force felt that the primary value of this solution is that it would focus on those residents contributing the most to the air quality problems during the fall and winter months, and that it would focus resources on the specific times of the year when the area is out of compliance with the federal air quality standards. Task force members recommend that this targeted approach will be an effective way to reduce fine particle pollution.

The Clean Air Agency has been issuing burn bans for a number of years, so changes to the existing program are needed to improve wintertime air quality. The task force considered a number of changes to make burn ban enforcement more effective. For example, as mentioned earlier, currently only eight to 12 personnel are used to enforce burn bans and other clean air regulatory requirements in King, Kitsap, Pierce, and Snohomish counties. A relatively small number of notices of violation have been issued in Pierce County during burn bans. The task force is recommending that considerably more personnel be used to enforce the burn bans in the nonattainment area.

Another change is that enforcement of a burn ban historically occurred only during daylight hours. However, data suggest that there is a large increase in the level of fine particle pollution from wood smoke in the evening hours. The task force is recommending that the Clean Air Agency explore the use of technologies that would allow for better evening enforcement of burn bans. Other recommended changes are listed below.

In addition, task force members felt strongly that use of enforcement personnel alone would not result in the change of behavior needed to alter wood burning practices. In addition to a significant increase in the use of additional enforcement personnel, the task force believed that community outreach and education are essential. The members suggested it would be particularly helpful to find opportunities for neighbors to talk with each other about air quality problems and the importance of complying with burn bans. They also suggested utilizing existing community-based programs, where possible, to foster this type of education and outreach effort. [It was also suggested that the Clean Air Agency continue to work closely with local media outlets to publicize burn bans, including clearly indicating in news accounts when burn bans were first called.](#)

The task force expressed concern about how renters would be treated, especially in cases where the renters are low income. The statements of principle for the task force's two major solutions include providing assistance to low-income households or helping them find alternatives. (See the first statement of principle for Enhanced Burn Ban Enforcement, and the second statement of principle for Date Certain Removal of Uncertified Wood Stoves and Inserts.) The task force members wanted to be certain that provisions for low-income households also included renters.

Key Features of Recommended Solution

- Ramp up enforcement presence during burn bans and winter season, phased in over several years.
- Enforce violations based on visible emissions, in addition to smoke density.
- Add nighttime enforcement, as practical.
- Maintain a two-stage burn ban, and consider changes to when and how the stages are called.
- Provide exemptions and/or assistance for low-income residents and households for whom the wood burning device is their only adequate source of heat.
- Include a registration program for all wood burning devices.
- Enhance outreach and education efforts.

Statements of Principle to Guide Implementation of Enhanced Burn Ban Enforcement

- Enforcement of burn bans should respect the challenges faced by low income burners and provide alternatives, even if these residents have other sources of heat available.
- Enhanced enforcement should be combined with a robust community outreach initiative to enable neighbors to talk with neighbors about the importance of obeying burn bans and burning cleanly when the community is not in a burn ban.
- Enhanced enforcement should be phased in to allow those who receive a first notice of violation to reduce or eliminate the initial fine if they engage in educational opportunities about proper burning practices and the importance of burn bans, or move to a cleaner source of heat. The initial fine should be meaningful enough to provide sufficient incentive to participate in education activities and to discourage subsequent burning during burn bans.
- Enhanced enforcement should continue to accommodate households for whom a wood burning device is their only adequate source of heat, while ensuring that the exemption is used only for

those who qualify. Exemptions from burn ban enforcement do not exempt people from burning cleanly nor from other standards.

- Decisions about who provides enforcement should be based first on who would be most effective, while respecting the need to consider any capacity challenges of local governments.
- When implementing a registration program, consider that the goal is to enhance effectiveness of enforcement staff and minimize unnecessary interactions with exempted households.
- Revisions to the Stage 1 and/or Stage 2 “trigger” levels should be considered, as they may enable burn bans to more effectively keep fine particle pollution below the federal daily standard during inversions, and better protect public health.
- Both forecast and monitored data should be included in the burn ban system (as they are currently) to call burn bans.

B. Date Certain Removal of Uncertified Wood Stoves and Inserts

Goal: Removal of the older, more polluting wood stoves and inserts from the nonattainment area

This solution provides lasting emission reductions by addressing one of the underlying causes of fine particle pollution—removal of uncertified wood stoves and inserts from the community. The older uncertified wood burning stoves and inserts are more polluting than are other sources of heat. However, this recommendation represents a considerable change from current practices in the community. As mentioned earlier, it is estimated that there are 24,200 uncertified wood stoves and inserts in the nonattainment area, with an estimated 21,200 currently being used.

The task force is recommending selection of a date for removal of uncertified devices that will strike a balance between several objectives: (1) provide sufficient time for local residents to make plans to accommodate this new requirement; (2) provide sufficient time for officials to attempt to secure implementation funding; but (3) not set a date too close to 2019 when the area must meet the air quality standards. With uncertainty about the rate of compliance for this proposal, the removal date must allow sufficient time prior to 2019 to adjust the solutions as needed. The task force is also recommending that the Clean Air Agency use a combination of “carrots and sticks” to encourage early adoption of this requirement. This would allow for implementation to be phased, while still maintaining a clear date certain when all uncertified stoves and inserts would be required to be removed.

The removal program would work in concert with the enhanced burn ban enforcement. For example, uncertified wood stove/insert users who receive a notice of violation during a burn ban could receive a higher fine if they have not removed their device by the deadline. Also, prior to the deadline, enforcement of burn bans could be used to help educate residents about the new removal requirement. This recommendation includes a proposal to create a registration system for all wood stoves and inserts. This element of the program would benefit both the enhanced burn ban enforcement and date certain removal strategies. By knowing who has an uncertified stove the Clean Air Agency can direct incentives to those residents, provide focused enforcement of a Stage 1 burn ban, and confirm removal of the uncertified device from those homes.

The task force is also recommending that once an uncertified wood stove is removed, the homeowner should be able to replace that stove (if they choose) with any other approved cleaner heating device, including a certified wood stove.

Key Features of Recommended Solution

- All uncertified wood stoves and inserts must be removed by 2015.
- Use a combination of incentives, fines, education and regulations (carrots and sticks) to encourage residents to remove uncertified devices prior to 2015.
- Create a registration system for all owners of wood stoves and inserts (both certified and uncertified).
- Create a “medium level” of confirmation regarding removal of uncertified stoves and inserts. This could include higher fines for using an uncertified device during a burn ban, or GPS-marked photos to confirm removal.

Statements of Principle to Guide Implementation of Date Certain Removal of Uncertified Wood Stoves and Inserts

- Households should have a range of options if they choose to replace their uncertified device (including certified device, pellet stove, or other type of heat), but incentives could vary depending on the device they use.
- Assistance should be provided for low-income households who may be affected by this requirement. The assistance could take several forms, including but not limited to, financial assistance for installing a new heating device, home weatherization, and/or providing additional time for low-income households to meet this requirement.
- The solution should accommodate households for whom a wood burning device is their only adequate source of heat.
- Date certain removal should allow time for transitions, yet begin soon enough that the date is meaningful. Timing of implementation should be equitable, be publically acceptable, and allow time to find funding.
- Medium level of confirmation is the preference. But if that is not sufficient to achieve EPA approval or program effectiveness, a more active form of confirmation should be used. If more rigorous methods of confirmation are needed, they should be equitable and as nonintrusive as possible.
- The purpose of the registration program is to confirm widespread removal of uncertified devices.
- Recognizing the current challenges in local, state, and federal budgets, funds should be prioritized according to the task force’s ranking, where possible. (See below.)

Allocation of Resources for Date Certain Removal Solution

There are a variety of ways that funds could be used to support this solution—the date certain removal of uncertified wood burning devices. But in these challenging economic times the availability of funding to support this solution is uncertain. Task force members were asked to rate several different potential

uses of funds in order to recommend some priority for the future funding, when and if it becomes available. The task force was provided with a list of five possible opportunities to use funds and asked to rank them from 1 to 5, with 1 being the highest priority and 5 being the lowest priority. Members were also given the opportunity to add other potential uses for funds. The following table lists potential uses of funds and the average ranking created by the task force:

Table 5. Task Force Ranking for Potential Use of Funds

Potential Use of Funds	Average Ranking
Assistance for low-income households	1
Assistance to households with no other adequate source of heat	2
Incentive payments for early adopters	3
Incentive payments for cleaner heat	4
Assistance to all households (regardless of income) for removal of stoves/inserts	4
Other (each receiving one vote): <ul style="list-style-type: none"> • Incentives for weatherization for all households that remove stove/insert • Assistance in retrofitting a fireplace with a certified wood heater or pellet heater • Use the point of sale of a home to remove uncertified stoves/inserts 	

Making Progress Toward Clean Air

The task force was mindful of the need to meet the federal Clean Air standard, but also to reduce overall levels of pollution in the Tacoma and Pierce County area. Since high levels of fine particle pollution have been demonstrated to have impacts on human health, the task force wanted the recommendations to [first and foremost, meet the federal standard. Secondly](#), the solutions should also make progress toward achieving the Clean Air Agency’s health goal of reducing fine particle pollution by 19 micrograms per cubic meter. Using the meter described earlier in this report, the task force reviewed the combined effects of the proposed solutions to understand how much progress can be made to achieve both goals. The progress meter shown in Figure 12 demonstrates that attainment could potentially be achieved by 2017 assuming the programs were fully supported over the time frame. By 2019, it is estimated that the nonattainment area would achieve fine particle pollution reductions well over the federal standard, and make progress toward the air quality health goal. It should be noted that there are a large number of assumptions in this estimate that have significant uncertainty. (See Appendix E.)

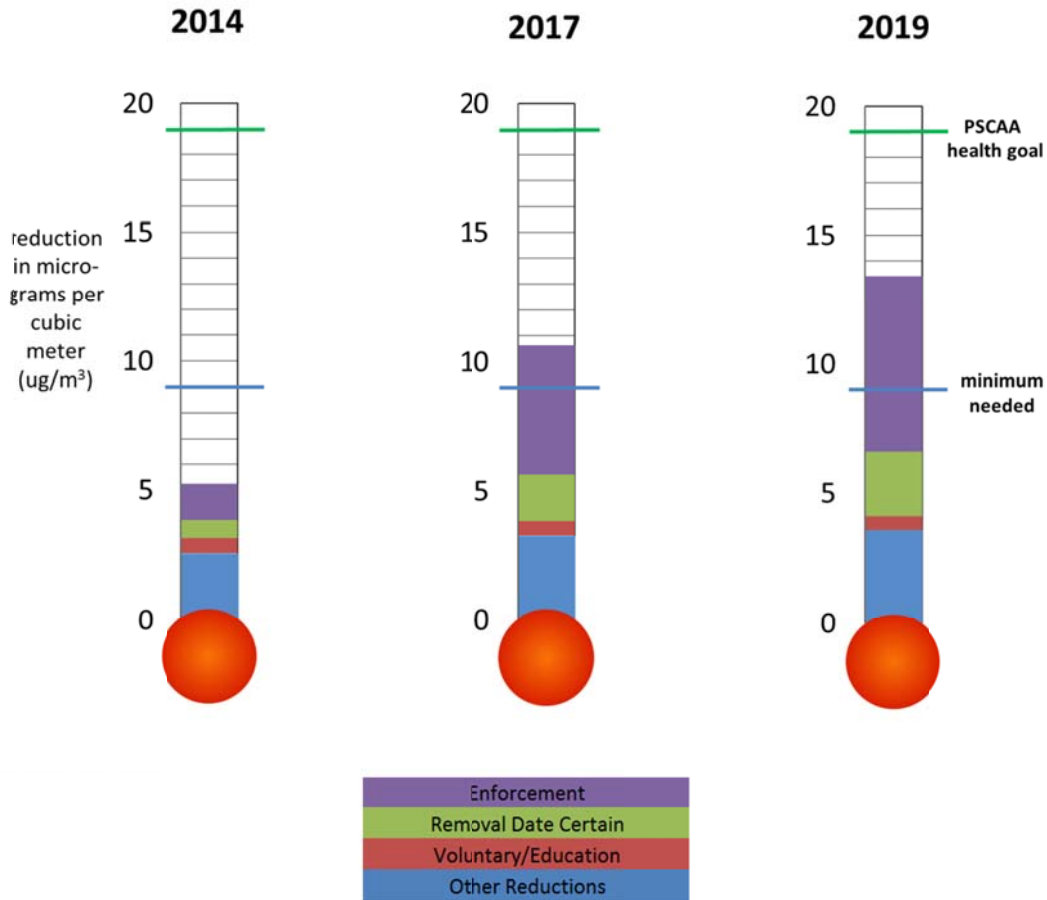


Figure 12. Progress Thermometer for Task Force Recommendations

This thermometer represents an estimated sum of the solutions proposed by the task force. Note: This is a compilation of a number of assumptions and has a significant level of uncertainty.

C. Contingency Measures

The State Implementation Plan submitted by Ecology to EPA, must identify the solutions the Tacoma–Pierce County nonattainment area will use to meet the air quality standards, and anticipated target dates for making progress toward reaching those standards (i.e., how much improvement in air quality is expected by certain dates). If those targets are missed or if the area is not making sufficient progress toward meeting the fine particle standards, then further solutions must be adopted. These additional solutions are called contingency measures. The state’s Plan must identify potential contingency measures. These measures can be heightened use of the solutions included in the Plan, or new solutions previously untried.

The task force is recommending that the following contingency measures be considered for inclusion in the Plan:

- A requirement that in the nonattainment area only the cleanest burning devices (equivalent to emissions produced by a pellet stove) be allowed.⁴
- That the time of sale of a home be used as an opportunity to confirm the removal of uncertified wood stoves or inserts (in addition to, as a backstop for “date certain”)
- That cleaner technologies be required for use of fireplaces, such as cost-effective catalysts, starters, or filter technology that has been shown to work (this technology has not yet been demonstrated successfully).
- For households that have an uncertified wood stove or insert as their only adequate source of heat, only those that are income qualified would receive assistance or be exempted from the requirement to remove their device.

D. Task Force Consensus on Recommendations

One of the ground rules adopted by the task force during its initial meetings was that the group would attempt to reach unanimous consensus on its recommendations. Unanimous consensus was defined as all members could support or could live with the recommendations. The ground rule also stated that if the recommendations were not unanimous, the differences of opinion would be noted.

There is unanimous consensus on the major solutions of enhanced enforcement, removal of uncertified devices, and getting reductions from vehicles, industry, and ships. For the detailed components of those solutions, there was also unanimous consensus with one exception. The majority of task force members supported the recommendation that a system of registration be created for all wood stove and insert owners in the nonattainment area. However, three members did not support that recommendation. They did not support the registration system for the following reasons:

- Only a small portion of wood burners may respond to a voluntary program, raising questions about whether the effort is worth the cost to implement such a program
- A registration program may create resentment (particularly among responsible wood burners) that could hinder efforts to reduce wood smoke pollution. It may be seen as government being too intrusive.
- Residents may have difficulty knowing if their stoves are certified or uncertified
- A registration program could be confused as needing permission to use a wood burning device
- A registration program could start as voluntary and informational, but could be used over time in a more regulatory/punitive fashion
- Registration will not result in fewer uncertified stoves and could result in impression of new government program that would foster less self-sufficiency

The task force discussed several ways of including fireplaces in the major solutions but did not come to consensus, other than to include fireplaces in the education about clean burning practices.

Information presented to the task force included the facts that fireplaces are estimated to be 34

⁴ The Task Force acknowledged that because the EPA is currently revising its emission testing protocol for stoves, this measure may not be available at the time the SIP is submitted, but could be added at a later date.

percent of the wood burning devices in use in the nonattainment area (see Table 1) and produce 21 percent of the wood smoke fine particle pollution. Based on this information, some task force members felt that fireplaces should be included in the major solutions.

On the other hand, the task force also learned that masonry fireplaces are exempted from Washington emission standards, although manufactured fireplaces must meet a state fireplace standard. All fireplaces are required to be shut down during Stage 1 and Stage 2 burn bans, so enhanced enforcement will address fireplace use during burn bans. There is currently no cost effective safe technology to assist fireplaces in burning more cleanly, although some technologies show promise. Closing off or removing fireplaces would be a considerable expense for homeowners, and some task force members were concerned that such changes would reduce the value of the home. For these reasons, other task force members felt that fireplaces should *not* be included in the solutions.

There was consensus to include a provision about fireplaces in the contingency measures.

VI. Next Steps

With this report the task force is transmitting its recommendations to the Puget Sound Clean Air Agency. The Agency's board will review the task force report as part of their process for making recommendations to the State Department of Ecology. In 2012 Ecology will consider the recommendations from the Clean Air Agency, conduct further analysis, and prepare a State Implementation Plan (SIP). That plan will be submitted to the federal Environmental Protection Agency (EPA) by December 2012 for their review and approval. The EPA will review the state Plan to ensure that it complies with the requirements of the Clean Air Act. During Ecology's development of the SIP there will be opportunities for public review and comment of the Plan.

Parallel with the development and approval of the SIP, the Clean Air Agency will be developing plans and implementing actions to improve air quality in the nonattainment area. Any local rules or state laws required to implement the solutions need to be in place before the SIP is submitted to EPA. The SIP will include the timeline for the implementation of the rules.

Appendix A

Demographics of Tacoma–Pierce County Nonattainment Area

Clean Air Agency staff provided the task force with a demographic snapshot, based on census data. See the table below. With respect to population density, in general the Tacoma neighborhoods in the nonattainment area tend to have population densities in the range of 5,000 – 10,000 people per square mile. Much of the remainder of the nonattainment area has population densities in the range of 1,000 – 5,000 people per square mile.

Nonattainment Area Demographics

Category	Characteristic	Measurement
Population	Total population	533,000
Households	Total households	222,000
	Percent owner occupied households	58%
Race/Ethnicity (Note: percentages total more than 100% because Hispanic can be any race)	American Indian/Alaska Native	1%
	Asian	7%
	Black	9%
	Hispanic (any race)	10%
	White	69%
	Other race	6%
	Two or more races	8%
Language	Residents who report they do not speak English “very well” (for all of Pierce County)	12.7%
	Major languages for those who do not speak English “very well”	Korean, Khmer (Cambodian), Russian, Spanish, Vietnamese
Income	Median income	\$51,458
	Poverty rate in Pierce County	12.3%
	Nonattainment area households at 150 percent the federal poverty level	Approx. 25,000 (17%)

Sources: US Census Bureau, Census 2010 Block Group Data (2011); U.S. Census Bureau, 2005-10 American Community Survey by census tract (2010)

Appendix B

Ground Rules: Clean Air Task Force

Final 6/16/11

Principles that will guide our work:

- **Transparency** in creating a thorough and open process
- **Respect** for one another's perspectives
- **Commitment** to recommending the best solutions for Pierce County

1. The task force is encouraged to think creatively about potential solutions for the issues the group has been asked to address. Task force members will agree to keep an open mind to possible new ideas, and to consider the diverse interests of all Pierce County residents.
2. The task force is comprised of people with a variety of perspectives and interests. Differences of opinion are to be expected and will be respected by the task force and its members. Task force discussions will be characterized by careful deliberation and civility. Task force members will work to understand the different points of view and perspectives of other members. Questions to better understand each member's interests are encouraged.
3. The task force will operate by consensus. The goal will be to reach unanimous consensus – meaning that all members can support, or live with, the task force recommendations. If unanimous consensus cannot be reached, differences of opinion will be noted and included as part of the task force final recommendations.
4. The task force is advisory to the Puget Sound Clean Air Agency Board. The Agency has ultimate responsibility for making decisions about which actions to recommend to the State.
5. Task force members are strongly encouraged to participate in every meeting to achieve continuity in discussions from one meeting to the next. If members cannot attend a meeting, it is his/her responsibility to be informed about the topics discussed by the next meeting. An absent member may ask someone to attend a meeting on their behalf to listen to the discussion, but that person will not be able to participate in discussions or votes.
6. If a task force member cannot attend a meeting and wishes to make a statement regarding an issue that is on the agenda for that meeting, he or she may provide the facilitator with a written statement, which will be read to the full group when the issue is being considered at the meeting.
7. Meeting materials will be sent via email to task force members and posted on the Clean Air Agency project web site in advance, whenever possible. Any handouts at meetings will be emailed, or mailed, to members who were not present.
8. Meeting summaries will be prepared and distributed via email or mail to all task force members in a timely manner. If task force members have comments or concerns about the summaries, they are to notify the facilitator promptly. The facilitator will work with members to resolve those issues and make sure that the final summary reflects any revisions made. Once the task force members have had an

opportunity to review the draft summary and after any revisions are made, the summaries will be distributed to the task force and posted on the project web site.

9. Task Force members have a wide range of knowledge about air quality issues. Deliberations will need to strike a balance between creating a common base of knowledge and information and moving expeditiously to development of recommendations. It is the intent of the task force to use the limited meeting time efficiently. The facilitator may consider creation of task force sub committees to explore selected issues and report back to the full task force. Once consensus on an issue has been reached the issue will not be reopened for discussion until the full “package” of final recommendations can be reviewed and considered as a whole.
10. Any member may speak to the media or other groups or audiences regarding issues before the task force, provided s/he speaks only for her or himself. Inquiries from the media or others can be directed to the facilitator or project manager. Members are asked to let the process reach its conclusion before describing potential strategies or ideas as task force recommendations. Members agree to bring issues or concerns to the task force before raising them with others in a public fashion.
11. It is understood that task force members may need to consult with their organizations before making commitments on behalf of their respective organizations. However, each member will work hard to understand any issue or concern raised by their organization and will communicate those issues in a timely fashion to the full task force.
12. All meetings will be open to the public.
13. Meetings will start and end on time.
14. The task force does not plan to take formal public testimony. However, the task force will accept comments or questions from the public at the conclusion of meetings.
15. The facilitator will communicate with task force members between meetings to better understand issues and search for consensus on solutions.
16. Clean Air Agency staff will be responsive to the information requests from the task force. However, it may not be possible to meet all information requests. Please make information requests outside of the task force meetings to the Agency project manager or the facilitator.

Role of the Facilitator

In addition to the roles described above, the facilitator will:

- Work with the task force and Agency staff to set the agendas for meetings
- Work to resolve issues regarding process or schedule
- Open the meetings and manage the flow and timing of the topics on the agenda
- Make sure that all task force members have opportunities to participate in discussions
- Prepare draft recommendations based on task force discussions
- Occasionally make presentations, in partnership with task force members, to outside groups about the work of the task force, as requested

Appendix C Evaluation Tools

WORKSHEET FOR TASK FORCE MEMBERS' EVALUATION

Name: _____

*How well does the solution meet each of the criteria below?
Rating scale: V (Very well), S (Somewhat/mixed), N (Not well)*

Solution	Maintainability (V – S – N)	Cost Commensurate with Benefit (V – S – N)	Public and Political Acceptance (V – S – N)	Economic Well- Being of County (V – S – N)	Minimize Burden on Vulnerable Communities & Populations (V – S – N)	Minimize Unintended Consequences (V – S – N)

Definitions:

- *Maintainability* – Will improve air quality over time; addresses the underlying causes of poor air quality.
- *Cost commensurate with benefit:* The cost of the solution is commensurate with the air quality benefits that it will achieve.
- *Public and political acceptance:* There will be sufficient public and political support for the solution.
- *Economic well-being of County:* Will enhance the economic development potential for the county.
- *Minimize burden on vulnerable communities and populations:* Will minimize the economic burden on individuals and households.
- *Minimize unintended consequences:* Will minimize the likelihood of unintended consequences.

Example of completed evaluation form:

Clean Air Task Force Solution Evaluation Tool
(See appendix for details on ratings)

Filled Out by Task Force

#	Brainstorm Idea	Filled Out by Task Force																
		micrograms per cubic meter	micrograms per cubic meter	\$/microgram per cubic meter	V/S/N	PSCAA V/S/N	Taskforce V/S/N	V/S/N	V/S/N	V/S/N	V/S/N	V/S/N	V/S/N	Taskforce V/S/N	V/S/N	V/S/N	V/S/N	V/S/N
B-S1	Uncertified Removal at Date Certain and Replace with Certified Devices, Permits, Medium Enforcement, Replacements ramp up	0.7	2.5	\$5.4M	S	V								N	S	V	V	V
D-S2	Ramped Up Enforcement to 75 Personnel: Permits, Smoke/No Smoke, Two-Stage Burn Ban, Night Enforcement, Increased Advertising, Low Income Exemptions	1.8	4.1	\$1.7M	S	S								S	S	S	V	V
E	Non-Wood Based Reductions: Ships/Gasoline/Diesel/Industrial	2.6	3.6	NA	V	V								V	V	V	V	V

Key:
N = Does not meet criterion well
S = Meets criterion somewhat/mixed
V = Meets criterion very well
 = No clear consensus on how well it meets the criterion

Appendix D
Solutions Developed by Task Force:
Organized by Potential for Pollution Reduction
Ranked Brainstorming Potential Solutions
DRAFT, 9/7/11

Notes:

- Reductions potentials are preliminary.
- Solutions are categorized only by their potential to reduce fine particle pollution and are based on the technical model. Any hurdles that might impede timely implementation are not considered, for example funding availability
- There may be other air quality, public health, or other benefits, unintended consequences, or impact on other community values not accounted for here.

Major Reduction Potential (See assumptions at end at table)

Identifier	Solution	Initial Estimates of Reductions
A	<p>Required removal of uncertified stoves and replace with non-wood burning device, weatherization, and registration program:</p> <p>Create mandatory registration program for wood burning devices (with fee based on efficiency, more efficient lower fee). Require weatherization, uncertified stoves to be removed by a certain date and, if a replacement is necessary, replace with natural gas. Include assistance for low income. Weatherization with sliding scale and high incentives for low income so it's fully paid for; higher fees for people who chose not to do changeout. For rentals, fee goes to owner, not tenant.</p>	Total reduction of 1.6 ug by end of 2014, 5.9 ug by end of 2019
B	<p>Require changeout of uncertified stove and allow replacement with certified stove, weatherization and registration program:</p> <p>Create mandatory registration program for all wood heating devices (fee based on efficiency, more efficient lower fee). Registration requires changeout of uncertified devices and weatherization of houses by a certain date. Include</p>	Total reduction of 0.7 ug by end of 2014, 2.4 by end of 2019

	assistance for low income.	
C	<p>Require removal or changeout of uncertified stoves at time of sale:</p> <p>Adopt a program requiring removal, decommissioning or changeout of uncertified stoves when homes are sold</p>	Total reduction of 0.7 ug by end of 2014, 2.2 ug by end of 2019
D	<p>Increase enforcement capacity:</p> <p>Increase number of enforcement personnel to enforce burn bans (consider contracting out for private enforcement personnel).</p>	Total reduction of 0.5 ug by end of 2014, 2 ug by end of 2019

Assumptions:

Removal and changeout solutions (A, B, and C):

50% of people do the removal or changeout by end of 2019

2,000 households per year

Start Jan 2013

Assumed 1/3 of the 2,000 per year needed weatherization creating a 5% reduction in heating requirements

Time of Sale Solution (C)

Would require legislation and so could not start until 2013

3 - 5% of houses are sold each year (low - high)

The fraction of uncertified devices in houses that are sold is the same as in all houses

Some houses will be resold, but we won't double count them

Assume 75% compliance

So, each year 2.2 - 3.7% of devices are removed (the number removed decreases each year)

Enhanced Enforcement Solutions (D)

4 Notices of Violation per Day per Field Team

No change of behavior based on Word of Mouth

No Outreach in Scenario

90% of burners that receive a notice of violation never violate a burn ban again.

10 Burn Ban Days per Year

2 Workers per Team (30 Total Teams)

Enforcement on Weekends, Weekdays, and Holidays

Supplemental Solutions for Major Solutions A, B, & C – Registration Program and Weatherization with Removal or Changeout of Uncertified Stoves, Remove or Changeout Uncertified Stoves or Fireplaces at Time of Sale of Home

Identifier	Solution	Key Information
A/B/C 1	Use incentives as a motivation to change out high emission wood burning appliances (fireplace, old technology wood stove) anytime to EPA certified /WA State approved stove, pellet stove, or natural gas/propane/electricity. Incentives could include tax incentives, cash, grants to pay some/all of costs, low interest loans.	<ul style="list-style-type: none"> • Provides funding options • Based on the response to previous voluntary changeout and removal programs, it does not attract enough people to have a significant reduction.
A/B/C 2	Have utilities pay for gas line extensions.	<ul style="list-style-type: none"> • Provides more options for changeouts and removals • Less expensive to operate than electric baseboard or oil
A/B/C 3	Explore how residents can pay the utility over time for extensions	<ul style="list-style-type: none"> • This is already an option with PSE
A/B/C 4	Create a bank where pollution sources pay in and the funds are used where and as needed for sources that will make a difference (similar to offsite mitigation)	<ul style="list-style-type: none"> • Likely to be small amount of money so won't make a large reduction • Provides funding options for removing or changing out stoves
A/B/C 5	Allow utility rate payers to opt in (volunteer) to pay for change outs (like PSE's Warm Home Fund)	<ul style="list-style-type: none"> • Likely to be small amount of money so won't make a large reduction • Provides funding options for removing or changing out stoves
A/B/C 6	Offer a coupon for changeouts or removals at point of sale	<ul style="list-style-type: none"> • Provides incentive
A/B/C 7	Either remove or "board up" fireplaces at time of sale or require gas/propane log retrofit, certified insert, or pellet insert.	<ul style="list-style-type: none"> • Total reduction of 0.3 ug by end of 2014, 1 ug by end of 2019 • Could supplement removal or changeout of uncertified stoves and inserts at time of sale

Supplemental Solutions for Major Solution D – Burn Ban Enforcement Related

Identifier	Solution	Key Information
D 1	Require registration of wood heat systems that are the only adequate source of heat prior to enforcement	<p>Registration by itself doesn't provide reductions, but can increase burn ban compliance if:</p> <ul style="list-style-type: none"> • Used to Identify homes with only adequate source of heat • Used to identify which homes have certified and which have uncertified

Identifier	Solution	Key Information
		devices <ul style="list-style-type: none"> • Combined with enhanced enforcement and other burn ban enforcement supplemental solutions
D 2	Registration at times of purchasing new stove or change out	Registration by itself doesn't provide reductions, but can increase burn ban compliance if: <ul style="list-style-type: none"> • Used to Identify homes with only adequate source of heat • Used to identify which homes have certified and which have uncertified devices • Combined with enhanced enforcement and other burn ban enforcement supplemental solutions
D 3	Take advantage of point of sale of homes for registration requirements	Registration by itself doesn't provide reductions, but can increase burn ban compliance if: <ul style="list-style-type: none"> • Used to Identify homes with only adequate source of heat • Used to identify which homes have certified and which have uncertified devices • Combined with enhanced enforcement and other burn ban enforcement supplemental solutions
D 4	Change current burn ban program to a single stage burn ban equivalent to Stage 2.	Total reduction negligible with current burn ban compliance, but if combined with enhanced enforcement and other burn ban enforcement supplemental solutions makes it more effective.
D 5	Make standards during non-attainment clear and understandable – i.e., no visible smoke	Total reduction negligible with current burn ban compliance, but if combined with enhanced enforcement and other burn ban enforcement supplemental solutions makes it more effective.
D 6	Ban on wood heat as only adequate source of heat for all households, existing and new; tied to financial assistance for other energy costs and change outs/ Wood burning devices should not be only adequate source of heat in non-attainment area.	<ul style="list-style-type: none"> • Total maximum reduction about 0.5 ug • Would eliminate exemption in burn bans, allowing better enforcement and compliance • If combined with enhanced enforcement and other burn ban enforcement supplemental solutions makes it more effective.
D 7	Improve enforcement of burn bans using infrared viewer/camera for night-	<ul style="list-style-type: none"> • Total reduction negligible with current burn ban compliance

Identifier	Solution	Key Information
	time enforcement	<ul style="list-style-type: none"> Allows enforcement at times when fine particle pollution is highest If combined with enhanced enforcement and other burn ban enforcement supplemental solutions makes it more effective. Cannot distinguish what type of device is creating the heat – could be something other than a wood burning device
D 8	Reduce “rates” for other sources of heat during non-attainment periods (assumed to mean during burn bans)	Total reduction negligible with current burn ban compliance, but if combined with enhanced enforcement and other burn ban enforcement supplemental solutions makes it more effective.

Supplemental Solutions Applicable to All Major Solutions – Wood Moisture Related

Identifier	Solution	Key Information
All 1	Use/distribute/educate on moisture content devices to wood burners (requirement?).	<ul style="list-style-type: none"> Reductions due to optimum wood moisture are not quantifiable. However, general consensus is that wood in the 15 – 25% range burns more cleanly than wood with either higher or lower wood moisture. Help reduce fine particle pollution at times outside burn bans
All 2	Central wood seasoning station or swap program – provide people with efficient fuel.	<ul style="list-style-type: none"> Reductions due to optimum wood moisture are not quantifiable. However, general consensus is that wood in the 15 – 25% range burns more cleanly than wood with either higher or lower wood moisture. Help reduce fine particle pollution at times outside burn bans
All 3	Voucher for dry firewood, based on renter’s income not landlord.	<ul style="list-style-type: none"> Reductions due to optimum wood moisture are not quantifiable. However, general consensus is that wood in the 15 – 25% range burns more cleanly than wood with either higher or lower wood moisture. Help reduce fine particle pollution at times outside burn bans
All 4	License wood fuel sellers to create certified wood exchange.	<ul style="list-style-type: none"> Reductions due to optimum wood moisture are not quantifiable. However, general consensus is that

Identifier	Solution	Key Information
		<p>wood in the 15 – 25% range burns more cleanly than wood with either higher or lower wood moisture.</p> <ul style="list-style-type: none"> • Help reduce fine particle pollution at times outside burn bans
All 5	Provide free moisture checks for cordwood fuel.	<ul style="list-style-type: none"> • Reductions due to optimum wood moisture are not quantifiable. However, general consensus is that wood in the 15 – 25% range burns more cleanly than wood with either higher or lower wood moisture. • Help reduce fine particle pollution at times outside burn bans
All 6	Create home fuel storage requirements.	<ul style="list-style-type: none"> • Reductions due to optimum wood moisture are not quantifiable. However, general consensus is that wood in the 15 – 25% range burns more cleanly than wood with either higher or lower wood moisture. • Help reduce fine particle pollution at times outside burn bans
All 7	Prohibit sale or use of cordwood fuel with 20%+ moisture content using Department of Ecology approved moisture meter.	<ul style="list-style-type: none"> • Reductions due to optimum wood moisture are not quantifiable. However, general consensus is that wood in the 15 – 25% range burns more cleanly than wood with either higher or lower wood moisture. • Help reduce fine particle pollution at times outside burn bans

Low Reduction Potential

Identifier	Solution	Key Information
L 1	Explore filtering technology for wood stoves to determine if it's effective and affordable	<ul style="list-style-type: none"> • Very limited applicability of existing filter technology to wood stoves • Other non-filter technologies like catalytic combustors, natural gas firestarters, and grates may reduce emissions • Not enforceable measure
L 2	Is there a way to change utility billing to become aware of energy use?	<ul style="list-style-type: none"> • PSE currently provides comparison of usage to the previous year for both electricity and gas. • May not reduce emissions if it encourages people with non-wood

		<p>sources of heat to switch over to wood to keep usage down.</p> <ul style="list-style-type: none"> • Not enforceable
L 3	Change Second Stage burn bans for non-attainment area. Call second stage burn ban when PM _{2.5} levels have reached 20 micrograms - down from 25 – current law	Would help if there was a large buildup of fine particles throughout a burn ban, but it generally goes down during the day and back up at night.
L 4	Impede burning of non-cordwood fuels.	<ul style="list-style-type: none"> • According to PSCAA survey, for Pierce County, on average, 92% of people burn only cordwood in their fireplaces, wood stoves and inserts. • Missing key information - how much non-cordwood is burned by the remaining 8% and emission factors for non-cordwood, but reduction is likely low. • Current law prohibits burning of anything besides seasoned cordwood.
L 5	Recycling incentive for non-cordwood wood waste so it doesn't get burned for heat.	<ul style="list-style-type: none"> • According to PSCAA survey, for Pierce County, on average, 92% of people burn only cordwood in their fireplaces, wood stoves and inserts. • Missing key information - how much non-cordwood is burned by the remaining 8% and emission factors for non-cordwood, but reduction is likely low. • Current law prohibits burning of anything besides seasoned cordwood.
L 6	Traffic signal synchronization	Less than 0.2 ug/m ³ reduction
L 7	Improving traffic flow	Less than 0.2 ug/m ³ reduction
L 8	Expand commute trip reduction program to "new" communities	Less than 0.2 ug/m ³ reduction
L 9	Auto trade-out program for bikes and/or fuel efficient autos	Less than 0.2 ug/m ³ reduction
L 10	Complete HOV lanes on I-5	Less than 0.2 ug/m ³ reduction
L 11	Light rail extension from King County to Tacoma	Less than 0.2 ug/m ³ reduction
L 12	Land use policies that make it easier for people to avoid use of vehicles	Less than 0.2 ug/m ³ reduction
L 13	Planning denser communities – more bike lanes and sidewalks	Less than 0.2 ug/m ³ reduction
L 14	Evaluate projects in I-5 Joint Base study to determine value to this issue	Less than 0.2 ug/m ³ reduction

Public Education and Outreach (in the parking lot for now – some of these could be part of an enforceable solution which may allow full credit)

1. Public education on vehicle idling similar to British Columbia signs
2. Target education of people with wood burning devices at times of burn ban
3. Promote programs that have multiple public benefits – i.e., safe routes to school
4. Educate fireplace burners
5. Find opportunities to collaborate with other agencies – i.e., health
6. Better targeting of educational outreach – i.e., have doctors share the message with families with asthma attack visits to hospitals
7. More use of social media to promote good practices and burn ban
8. Mothers against dirty air campaign
9. Education re: acceptable practices on idling
10. Add fun to the mix – competition for “clean cities”. Create incentives for winners – rewards like the winning city gets free electric car plugins, Best of Western WA.
11. Help people plan ahead for winter
12. Use more aggressive media campaign during burn ban periods
13. Take advantage of point of sale of homes for registration requirements, or education.
14. Explore list from previous brainstorming re: marketing/outreach

Appendix E

Assumptions Made in Solution Analysis

Appendix: Evaluation Tool Notes

Major Solution: Increase Enforcement Capability during Burn Bans

Solution Description: Increase number of enforcement personnel to carry out burn bans (consider contracting out for private enforcement personnel).

General Assumptions:

The main assumption of this scenario that results in pollution reduction is that a major percentage of people who receive a burn ban civil penalty never burn again during a ban. The scenario to make this idea quantifiable is to increase the number of inspectors from our current 12 to 75 (likely using a subcontractor).

1. This assumes calling 10 burn bans days per year in Pierce County. This was based on the calculated average number of days over 35 micrograms per cubic meter over the last 5 years.
2. 75 Field Workers (ramped up – year 1: 25 workers, year 2: 50 workers, year 3+: 75 workers).
3. 1 Worker per Field Team.
4. 7 Hours of Enforcement on weekends and weekdays during daylight hours (daytime enforcement only).
5. 1.25 Notices of Violation (NOV) per Hour per Worker – a rate estimated from compliance staff at PSCAA.
6. 80% Rate of NOV to Civil Penalty – a rate estimated from compliance staff at PSCAA of the percentage of NOVs that result in a civil penalty.
7. 0% Word of Mouth Percent to Neighbors about Civil Penalty – Unknown and took conservative assumption as we do not know if anyone tells their neighbors they got an NOV or paid a fine.
8. 25% Repeat Offender Percent – This means that 25% of the people who receive a civil penalty from PSCAA continue to burn during burn bans. This percentage is highlighted as it was increased from when we first presented this to the task force. We originally presented 10%, but there was some consensus from the Clean Air Task Force that compliance with burn bans was worse and should be lowered. Our system is not set up to track if people are repeatedly receiving notices of violation, so there is a high level of uncertainty in this assumption.
9. 25% Percent Burners during the Day – This means 25% of the people who have a wood burning device and use it will be burning during the day. This is based on recent surveys of Pierce County and Puget Sound residents. This figure puts a maximum number of burners that could be burning during the day if none were complying with the burn ban.
10. 80% Percent of All Devices Burning During Burn Ban -- This means 80% of the people do NOT comply with the burn bans, and 20% do comply. This is based on surveys in the nonattainment area on burn ban compliance. Additionally, it factors in people simply not burning (busy, on vacation, etc.). This

assumption sets another upper bound on how many devices can be enforced and are burning during a burn ban.

11. The scenario assumes enforcement based on visible emissions alone, not smoke density (opacity) as is currently done.
12. There is an exemption for income-qualified households to burn during a burn ban.
13. Assumes some form of registration program to identify only adequate source of heat burners, income-qualified households, and certified devices.
14. Higher night enforcement presence.
15. Large burn ban advertising campaign (approximately \$200,000 or 50% of the county audience is reached more than 3 times via television, radio, and online ads). Conservatively estimated only 5% additional compliance from uninformed burners – high level of uncertainty on this estimate.
16. Assumes current two-stage burn ban program (no alterations to trigger levels, fines, etc).

Cost Assumptions:

1. Cost of Field Staff per year including all costs: \$560,000.
2. Cost of Legal/Administrative Staff per year including all costs: \$220,000.
3. Cost of training for all field staff per year: \$40,000.
4. Vehicle Costs for 10 burn ban days per year: \$30,000.
5. 1 Hour to Process 1 NOV – a rate estimated from compliance staff at PSCAA, includes administrative staff time, interaction with individuals, paperwork, etc.
6. Night Enforcement Devices (infrared cameras): \$90,000.
7. Civil penalties collected: \$530,000.
8. Burn Ban Advertising: \$200,000.

Agency Evaluation of Each Criterion with Rationale:

Reduction

By 2014: 1.4 micrograms per cubic meter (about 15% of the minimum reduction needed)

By 2019: 6.8 micrograms per cubic meter (about 75% of the minimum reduction needed)

Economic Feasibility

\$1.2M per microgram per cubic meter

Maintainable:

Somewhat/Mixed = Does not improve air quality over time significantly by 2014, but does with ramp up by 2019. It does not address some of the underlying causes (such as wood is still a source of heat and the potential is there if enforcement funding ended).

Implementation:

Somewhat/Mixed = May be hard to find 75 inspectors to work 0-2 weeks on-call each winter. There is, however, a commitment to enforce burn bans as the program is already established through PSCAA and adequate authority already exists in Washington State law.

Unintended Consequences:

Somewhat/Mixed = May be public backlash that endangers the burn ban program, unexpected staff time burden processing notices of violation, unexpected staff time and costs to run program, unexpected financial burden on the public.

Funding Availability:

Somewhat/Mixed = Funding could potentially be secured based on prior commitments from the legislature focusing on wood smoke. There is a lot unknown with the current budget, but we judge funding may be plausible.

Technically Feasible/Sound:

Somewhat/Mixed = We have been enforcing burn bans in Washington for over 20 years. With increased enforcement that would curtail future burning, we can make estimates of what the future emission reductions would be. However, night enforcement can be technically challenging and we are exploring current technologies to increase current capability.

Timing/Timely:

Very Well = Can implement before 2014 if a contractor could be lined up and trained for enforcement. A lot of knowledge and infrastructure is already established from our experience.

Enforceable:

Very Well = Is already in Washington State law and would qualify with EPA's criteria as enforceable.

Major Solution: Date Certain Removal of Uncertified Devices

Solution Description:

1. Require uncertified stoves to be removed by a certain date.
2. Add measures to make program more equitable (e.g home weatherization with removal, incentives, subsidize for low income households an alternative source of heat for homes with no other heat source, etc).

Assumptions:

Assumptions that Effect Emissions:

1. Removal rate of 1,000 uncertified devices removed per year.
2. Expect actual compliance/disclosure rate of 33% (7,000 uncertified devices removed out of 22,000).
3. Assumes 50% of households that remove uncertified devices purchase their own certified device on their own money. This is based on PSCAA agency records of change-out programs where 50% chose a certified wood burning device when given the option to replace with another heat option, even when the incentive was smaller. Also includes 2% growth of certified devices each year with new construction.
4. Actual date certain is August 2015, with first 1,000 removed before this date with incentives.
5. Assumes some form of registration of all wood stoves and inserts (not including fireplaces) to confirm removal of uncertified devices.

Assumptions that Effect Cost:

The following are just an example of potential programs that could be included based on if funds were available to implement all of these. If the compliance assumption is raised, the costs would similarly increase for most categories:

1. **Free removal for all uncertified devices.** Costs about \$4M over the life of the program.
2. **Free weatherizing to all income qualified households** as this scenario potentially removes a cheaper source of heat and makes household more reliant on utility. 12% of Pierce County is below the poverty level (2005-2009 data). Used 150% of the poverty level or 18%. Weatherization assumptions from PSE's 2010 Integrated Resource Plan. Includes percentage of single family residence estimates where weatherization is possible. Also includes cost estimates for each type (weatherstripping, floor, wall, and attic insulation). Costs about \$4M over the life of the program.
3. **If only adequate source of heat, program will provide subsidy to purchase and install a new sources of heat.** About 300 devices will be replaced by other non-wood heating sources for low income residents (0.20% to 28.3% of wood device owners could be primary burners based on wood stove change-out data). Conservatively, used ratio of uncertified devices to get total from primary burners (34%). Costs of replacement devices from experience with

our change out programs (\$2500 for certified stove, \$6500 for natural gas stove/insert, \$4500 for heat pump, \$9500 for whole house heat pump, \$4500 for propane). Costs about \$2.5M over life of program.

4. **\$500 reward if uncertified device is removed within the first year** (up to 3,000 devices). Costs no more than \$1.5M over life of program.
5. **Registration program.** Staff costs for maintaining program conservatively estimated at \$200K/yr.
6. **Expanded outreach** to ensure that the message gets out to all communities and ample efforts are made to communicate to low income and other groups regarding heat/weatherization/etc. Assumes 5% of program costs (\$280K).

Agency Evaluation of Each Criterion with Rationale:

Reduction

By 2014: 0.7 micrograms per cubic meter (less than 10% of the minimum reduction needed).
By 2019: 2.5 micrograms per cubic meter (about 25% of the minimum reduction needed).

Economic Feasibility

\$5.4M per microgram per cubic meter if all the programs above were implemented.

Maintainable:

Very Well = Will improve air quality (2.3 micrograms per cubic meter by 2014), does address some underlying causes.

Implementation:

Somewhat/Mixed = May be difficult to enforce required removals, but expected compliance set low in model. May be implementable with enough incentives. No current commitment or authority to do so.

Unintended Consequences:

Not Well = May be public backlash that endangers the burn ban program, unexpectedly low level of compliance, unexpected staff time burden processing notices of violation, unexpected staff time and costs to run program, unexpected financial burden on the public.

Funding Availability:

Somewhat/Mixed = All funding would not likely be secured by 2014, possibly beyond. This criterion is highly dependent on which program options are chosen and how it drives the costs.

Technically Feasible/Sound:

Very Well = Emission reductions would be easily measured.

Timing/Timely:

Very Well = Good reductions by 2014 and 2019.

Enforceable:

Very Well = Qualifies as an enforceable measure in EPA criteria.