

City of Portola

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August 18th 2015

Mary Nichols, Chairperson California Air Resources Board 1001 I Street Sacramento, CA 95814

Support for Woodstove Changeout Program in Second Investment Plan

Dear Chairperson Nichols,

On behalf of the City of Portola, I am writing in support of a woodstove changeout concept included in the Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan released July 27, 2015. Our City and air district is located within a rural area of the state in Plumas County, in which many of the residents use woodstoves as their primary source of heating. A high percentage of the existing woodstoves are older uncertified devices. Recently Portola was listed in the Federal Registry as a non-attainment area for PM2.5. This is primarily from residential wood stove use. Reducing the number of inefficient stoves by replacing them with either the most efficient, lowest polluting woodstoves, or with propane gas or electric heating devices, will have major benefits in terms of decreased climate pollutants, lower levels of toxic air pollutants, and an overall increase in public health. And, in our case, though a daunting task, compliance with the federal mandate to reduce the levels of PM2.5 the goal of the City of Portola.

As you know, incomplete combustion of wood occurs when using low-efficiency wood stoves, the type most common in our city. When wood is burned in these stoves, many pollutants are emitted, including greenhouse gases such as carbon dioxide, methane, and nitrous oxide. A woodstove changeout program would result in significant and measureable reductions in these pollutants, as much as a 1 ton reduction in CO2e per cord of wood for every uncertified stove converted to a certified stove with catalyst.

Your support of the woodstove change out program would also have measureable cobenefits. Wood smoke contains black carbon, a short-lived climate pollutant specifically mentioned in Governor Brown's January 2015 Inaugural Address. Estimates previously made by ARB indicate that fireplaces are the fourth largest contributor to black carbon emissions, making it essential that we decrease black carbon emissions from these sources in order to meet the Governor's targets.

Another co-benefit I am sure you are aware of is that replacing older woodstoves with more efficient heating devices would be the potential improvement to public health in communities affected by woodsmoke. Wood heating is a source of PM 2.5, and decreasing PM 2.5 from older woodstoves will improve indoor air quality as well as outdoor air quality, where the particulate matter can become trapped in the air due to the natural topography and stagnant weather conditions.

Many air districts around the state have already implemented woodstove changeout incentive programs when local funding is available, and have been highly successful in targeting lower income areas with high uses of wood heat and/or areas where woodsmoke causes significant public health impacts. With the incentives that could be provided through a woodstove changeout program, residents in rural, often low-income communities could be incentivized to replace their older stoves with a more efficient heating option, and in turn decrease climate and toxic pollutants, improve overall public health, and save money on monthly energy bills. However, as you are aware, in our case, the City of Portola has been designated a Severely Disadvantaged Community that, if it were not for location and size, would have qualified as SDAC under the first round of Cap & Trade Program funding. This is why we are encouraged by the efforts of our local air district in assisting Portola with a woodstove changeout program.

We greatly appreciate the Air Resources Board's work on the Concept Paper for the Capand-Trade Auction Proceeds Second Investment Plan, and especially commend the inclusion of a woodstove change out provision. The City of Portola looks forward to working with you to further develop a statewide program for wood stove replacements to help California meet its climate and public health goals.

Thank you in advance for your thoughtful consideration and continued efforts,

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Robert A. Meacher

City Manager

Portola, California

CC:

Gretchen Bennitt NSAQMD Assemblyman Dahle Senator Gains Congressman La Malfa Senator Boxer Senator Feinstein