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December 11, 2015

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

Support for Wood Heating Device Change Out Program in Second Investment Plan

Dear Chairperson Nichols,

On behalf of the Northern Sierra Air Quality Management District (District) we are writing in support of a wood heating device change out program included in the proposed investments of cap-and-trade auction proceeds for Fiscal Years 2016-17 and 2018-19.

The District covers the three rural counties of Plumas, Sierra and Nevada. The air quality situation in Portola, Plumas County is dire – not only designated as a federal PM2.5 nonattainment area, but also recently designated by the Environmental Protection Agency as one of the ***top five most polluted areas in the nation*** relative to the annual PM2.5 NAAQS.

A recent District survey uncovered that 70% of residents in Portola use woodstoves, and it is estimated that 65% are low-efficiency (non-EPA certified) wood stoves. There is no natural gas supplied to Portola, or any part of Plumas County. When wood is burned in these uncertified stoves, many pollutants are emitted, including greenhouse gases such as carbon dioxide, methane, and nitrous oxide. A wood device change out program would result in significant and measureable reductions of 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.

A wood device change out program would also have measureable co-benefits. 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.

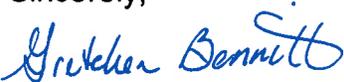
Portola is typical of many rural mountain communities – communities which rely on cheap and available wood as the primary fuel and have strong, wintertime inversions, trapping the smoke in the breathing zone of residents.

With incentives that could be provided through a wood device change out

program, residents in the rural areas of California 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 energy bills.

We greatly appreciate the inclusion of a wood heating device change out program in the Draft Second Investment Plan for Fiscal Years 2016-17 and 2018-19. Our district 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.

Sincerely,



Gretchen Bennett, Executive Director
Northern Sierra Air Quality Management District

CC:

Northern Sierra Air Quality Management District Board Members:

Plumas County Supervisor Thrall, Chair
Plumas County Supervisor Swofford, Vice-Chair
Nevada County Supervisor Scofield
Nevada County Supervisor Anderson
Sierra County Supervisor Roen
Sierra County Supervisor Huebner

Assemblyman Brian Dahle

Representative Doug LaMalfa