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**MENDOCINO COUNTY  
AIR QUALITY MANAGEMENT DISTRICT**

December 10, 2015

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

RE: Support for Woodstove Change-out Program

Dear Chairperson Nichols,

The Mendocino County Air Quality Management District (MCAQMD) supports the woodstove change-out concept included in the Concept Paper for the Cap and Trade Second Investment Plan. A large percentage of Mendocino County residents rely on wood heating for their heating requirements and have done so for many years. A high percentage of these wood burning devices are old, inefficient, and uncertified devices and replacing them with new efficient, cleaner burning woodstoves, or with natural gas, propane, or electric heating devices will have a significant GHG emission reduction and consequent public health benefit.

Incomplete combustion of wood occurs when using low-efficiency wood stoves such as those most common in our district. When wood is burned in these stoves, Green House Gases such as carbon dioxide, methane, and nitrous oxides are emitted. A woodstove change-out program could result in significant and measurable reductions of these pollutants, as much as 1 ton of reduction in CO<sub>2</sub>e per cord of wood burned.

A co-benefit of replacing older woodstoves with more efficient heating devices would be the potential improvement to public health in areas affected by wood smoke. Wood heating is a significant source of particulate matter. Decreasing levels of PM from older woodstoves would improve both indoor and outdoor air quality, where the PM can become trapped in ground-level air due to natural topography and stagnant atmospheric conditions. While Mendocino County is within the North Coast Air Basin, local topography accounts for several smaller basins in which these types of occurrences can be localized and severe, especially in the colder months of the year.

Many air districts around the state have already implemented woodstove change-out incentive programs when local funding is available and have been highly successful in targeting lower income areas with high usage of wood heat, such as the rural areas of Mendocino County. With the incentives that could be provided through a woodstove change-out program, residents in areas such as these could be incentivized to replace their older stoves with a more efficient heating option. This, in turn, would decrease climate and toxic pollutants, improve overall public health, and save money on energy bills.

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

Sincerely,

A handwritten signature in blue ink, appearing to read "Robert A. Scaglione". The signature is stylized with a large initial "R" and a long horizontal stroke at the end.

Robert A. Scaglione  
Air Pollution Control Officer

cc: Alan Abbs, Executive Director, CAPCOA