



County of Tehama Air Pollution Control District

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December 10, 2015

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

RE: Support for Woodstove Change-out Program in Second Investment Plan

Dear Chairperson Nichols,

The Tehama County Air Pollution Control District (District), supports the woodstove change-out program included in the Draft Second Cap and Trade Investment Plan. Tehama County is located within a rural area of the state, in which many of the residents use woodstoves as their primary source of winter heat, with a high percentage being older uncertified devices. Reducing the number of these inefficient stoves by replacing them with the most efficient, lowest polluting woodstoves, natural gas stoves, 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.

As stated in the support letter dated August 18, 2015, the Tehama County Board of Supervisors is in support of a woodstove change-out concept. Incomplete combustion of wood occurs when using low-efficiency wood stoves, the type most common in our County. An estimated 4,536 residences currently use wood as a primary heating source in Tehama County. When wood is burned in these stoves, many pollutants are emitted, including greenhouse gases such as carbon dioxide, methane, and nitrous oxide. A woodstove change-out program would result in significant and measurable reductions in these pollutants, with as much as a 1 ton reduction in CO₂e per cord of wood for every uncertified stove converted to a certified stove with a catalyst.

A woodstove change-out program would also have measurable 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 the California Air Resources Board (CARB), indicate that fireplaces are the fourth largest contributor of 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 of replacing older woodstoves with more efficient heating devices would be the potential improvement to public health in communities affected by wood smoke. 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 natural topography and stagnant weather conditions.

Many air districts around the state have already implemented a woodstove change-out incentive program, 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 wood smoke causes significant public health impacts. With the incentives that could be provided through a woodstove change out program, residents in rural, often low-income communities, could be incentivized to replace their older stoves with a more efficient heating method, and save money on monthly energy bills.

The District appreciates CARB's work on the Draft 2nd Cap and Trade Investment Plan, and especially commends the inclusion of a woodstove change-out provision. Tehama County looks forward to working with you to further develop a statewide program for woodstove replacements to help California meet its climate and public health goals.

Sincerely,

A handwritten signature in black ink that reads "Kristin Hall-Stein". The signature is written in a cursive, flowing style.

Kristin Hall-Stein
Tehama County Air Pollution Control District