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August 6, 2015

RE: Cap and Trade Second Investment Plan, Draft Concepts

I am John Crouch, the Director of Public Affairs for the Hearth, Patio, & BBQ association, (HPBA) which is the North American trade association for all wood, pellet, electric, and gas hearth products. We are headquartered in Arlington, Virginia, although I am our west coast presence, and office in Sacramento.

I appreciate this opportunity to offer our thoughts, and our support, for a new concept in the Second Investment Plan; Residential Woodsmoke Reduction.

Based on our experiences working with State, Federal, Tribal, and Non-Profit partners on woodstove changeouts over the last 25 years, there are three points I would like to make about this concept.

1. While it is well understood that older, un-certified stoves have higher emissions of Organic Carbon, less attention has been given to the higher emissions of other pollutants, particularly Methane. Older stoves have at least twice the emissions of Methane as do stoves of the mid-90's, which is the most recent data EPA reports.
2. Older woodstoves wear out very slowly. When we worked with EPA and the state of Montana on the changeout of an entire town, Libby, Montana, we found stoves that were easily 30 years old.
3. Older woodstoves are often the only option for heating in rural communities, that do now have access to natural gas. While middle-income households are slowly but surely upgrading their old stoves on their own, if there is not a RECLAIM type program, which claims and destroys these old stoves, then they will live on for years, usually in disadvantaged households. Old woodstoves are very similar to older automobiles, and older Diesel trucks, in that folks who do not have a lot of options will keep them going for a long time.

With these points in mind it is easy to assess that this concept squarely addresses several of the Overarching Themes. It can be structured to especially benefit rural, disadvantaged households. It can be carefully integrated into residential energy efficiency programs which will leverage the inherent efficiency improvements in the newer stoves.

It has a major co-benefit in reducing fine particulates in these communities, and inside these homes. It clearly reduces short-lived climate pollutants.

One final thought is this: Rural communities will continue to burn wood for heat. The Second Investment Plan is a unique opportunity to drive down greenhouse gas emissions, while providing many co-benefits to rural California's.

We look forward to assisting in any way we can in this effort.