

**North Coast Unified Air Quality  
Management District**  
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August 31, 2015

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

**RE: Support for Woodstove Changeout Program in Second Investment Plan**

Dear Chairperson Nichols:

The North Coast Unified Air Quality Management District (District), supports the woodstove changeout concept included in the Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan released July 27, 2015.

Our District jurisdiction covers the three rural counties of Humboldt, Del Norte, and Trinity. In these counties, many of the residents use woodstoves as their primary source of heating with a high percentage being older uncertified devices. Reducing the number of these inefficient stoves by replacing them with either the most efficient, lowest polluting woodstoves, or with natural 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.

Incomplete combustion of wood occurs when using low-efficiency wood stoves, the type most common in our district. 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 CO<sub>2</sub>e per cord of wood for every uncertified stove converted to a certified stove with catalyst.

A woodstove 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.

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 the natural topography and stagnant weather conditions.

Our District has implemented a successful changeout program over the last 15 years as funding has been available. The District incentive amount has been \$500 and we estimate that we have avoided approximately 46 tons of CO and 6.5 tons of PM 2.5, but we still have a long way to go and the need for a continued changeout program is greater than ever. As woodstove technology continues to improve, the cost of these stoves continues to climb. Since 2010 we have seen an increase in the number of applicants applying for our programs when they are available and an increasing number of these applicants are placed on a waitlist due to lack of funding. For example, our last cycle in the 2014-2015 fiscal year saw a record 28 eligible applicants placed on our waitlist for funding.

Many other air districts around the state have also 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. Our program does not currently target low income areas, but we have seen an increased need to target this section of the population who would have no other means to afford the replacement costs associated with these projects. In our three county jurisdiction, approximately 20% of the residents are at or below poverty level. With the incentives that could be provided through a woodstove changeout program, residents in our 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.

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. 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,



Brian Wilson  
Air Pollution Control Officer

c: Alan Abbs, Executive Director, CAPCOA