**Comments on woodsmoke pollution reduction in the draft Cap and Trade Auction Proceeds Investment Plan**

350 Bay Area is a 7,500 member climate activist organization working for deep reductions in carbon pollution in the nine San Francisco Bay Area counties and beyond.  We applaud the draft Cap and Trade Auction Proceeds Investment Plan for addressing wood smoke pollution, but strongly suggest that GHG Reduction funds should only be used to replace wood-burning stoves and fireplaces  with clean alternatives that are efficient and zero-emission on site, such as electric heat pumps.  Programs should not be funded if they replace wood-burning devices by other carbon-producing or greenhouse gas emitting devices.

Page 15 of the draft investment plan describes the target of reducing residential wood smoke from home heating.   We agree with the importance of this target: According to the Bay Area Air Quality Management District’s data, wood smoke from fireplaces and wood stoves is the major source of particulate matter pollution in the Bay Area in the winter months, causing significant public health impacts, especially to children, the elderly, and the one in seven residents who suffer from respiratory illnesses, such as asthma and bronchitis. These impacts are the most apparent to disadvantaged communities as they live in areas without natural gas service and in areas where generalized wood smoke pollution is augmented by localized industrial and transportation emissions, increasing the likelihood that residents of these communities will develop a respiratory illness.

The current investment plan suggests (p  15) “there are climate and air quality benefits to be gained by aiding the replacement of inefficient fireplaces and wood stoves with natural gas heating (if available) or the most efficient lowest polluting wood stoves."

 We urge that the investment plan require that wood-burning stoves and fireplaces are replaced with clean alternatives that are efficient and zero-emission on site, such as electric heat pumps.

While EPA-certified wood-burning devices generate lower particulate emissions than non-certified devices, laboratory performance of EPA-certified devices do not mirror real-world performance because testing procedures do not mirror in-home conditions. Moreover, EPA-certified devices still emit significant levels of particulate pollution, consume large amounts of wood fuel, and have not been shown to effectively reduce emissions of toxics, such as dioxins and furans.

Using EPA-certified wood-burning devices as the replacement would also run counter to efforts, such as the Marin Carbon Project, to accelerate carbon sequestration, as burning wood can actually result in higher carbon emissions than burning coal as it takes much longer to regrow a large tree than to burn it.

Natural gas may burn cleaner than wood, but it still emits a significant amount of carbon dioxide and is a major contributor to climate change. As a fossil fuel, natural gas has significant climate-disruption impacts due to the methane and carbon dioxide that is emitted during its extraction, transport, and burning.

Sincerely yours,

Claire Broome, MD

350 Bay Area