August 14, 2015

Mary Nichols, Chairperson

California Air Resources Board

1001 I Street

Sacramento, CA 95814

Support for Woodstove Change Out Program in Second Investment Plan

Dear Chairperson Nichols,

On behalf of the Glenn County Air Pollution Control District, we are writing in support of a woodstove change out concept included in the Concept Paper for the Cap-and-Trade Auction Proceeds Second Investment Plan released July 27, 2015. Our district is located within a rural area of the state, in which 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 change out program would result in significant and measureable reductions in these pollutants, as much as a 1 ton reduction in CO2e 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.

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 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 option, and in turn decrease climate and toxic pollutants, improve overall public health, and save money on monthly energy bills. Glenn County is ranked 50th in median household income and 53rd for per capita income in the state. A woodstove change out program would be very beneficial to residents of Glenn County.

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,

Kevin Tokunaga,

Environmental Program Manager