

US EPA ARCHIVE DOCUMENT



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The Honorable Gina McCarthy
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator McCarthy:

The Local Government Advisory Committee (LGAC) appreciates the opportunity to work with you and the US EPA on a wide range of issues of interest and concern to local governments. More specifically, the Committee is grateful to have the opportunity to comment on the January 3, 2014 proposed updates to the New Source Performance Standards (NSPS) for Residential Wood Heaters.

According to EPA estimates, residential wood combustion emits 390,000 tons per years of PM2.5 and accounts for nearly 25% of all area source air toxic cancer risks and 14% of non-cancer respiratory effects (National Air Toxics Assessment, 2005). Emissions of fine particles and other pollutants can cause health problems, especially for children and older adults. In addition, home firewood consumption has been rising over the last decade.

Strengthening emissions requirements for new wood stoves is an imperative step forward in protecting public health, especially for children and older adults, who are at greater risk from the fine particle pollution wood smoke contains. The rule's anticipated effect of cutting particle pollution from new stoves and heaters by 80% is vital for our nation and reflects the myriad improvements in technology that have occurred since EPA issued the original NSPS for residential wood heaters in 1988.

While the proposal only covers new wood heaters, the Committee believes it is important for EPA to promote voluntary programs for existing wood heaters. Making these programs more visible through outreach and roundtables with states, industry, local governments, local fire departments, environmental groups, and other stakeholders can help those localities explore local solutions and share information, including innovative funding strategies for replacements or retrofits of wood heaters and enacting regulations such as no-burn days and requirements that old woodstoves be

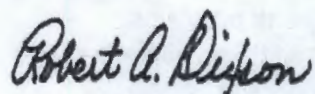
removed when a house is sold, as required in the State of Oregon. EPA's Burn Wise program, and especially its *Strategies for Reducing Residential Wood Smoke* guide, is a valuable tool for states, tribes, local governments, and communities, but many communities may not be aware that such a guide is available. Model examples of state and local ordinances and best practices help communities learn from one another to cut particle pollution and better protect their residents. These local programs are a great, effective complement to EPA's regulations and could benefit from wider implementation.

Additionally, while the proposal does not cover indoor or outdoor fireplaces, the Committee encourages EPA to create a voluntary certification program for new fireplaces. Utilizing an "EPA certified" label on fireplaces, as used on wood stoves, will help consumers make educated purchases that are better for their health and their wallets. EPA's current voluntary partnership program to encourage manufacturers to redesign fireplaces to be lower-emitting provides a good base for expansion.

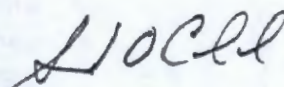
Finally, the Committee supports phasing in the new limits for hydronic heaters and forced-air furnaces in two steps over a five-year period, rather than three steps over eight years, to maximize health benefits and protect our communities sooner.

By strengthening EPA's partnerships with local communities through voluntary programs and extensive outreach, we can get the most out of these proposed revisions to the NSPS for residential wood heaters and best protect the health of our people. The LGAC appreciates the opportunity to provide comments, and we look forward to our partnership with the EPA as we work to decrease emissions of fine particle pollution and air toxics from wood smoke.

Sincerely,



Mayor Bob Dixon
Chair, LGAC



Supervisor Salud Carbajal
Chair, Air, Climate & Energy Workgroup