



Town of Mammoth Lakes

Woodsmoke Reduction Program

Program Guidelines

October 2022

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EXECUTIVE SUMMARY

The Woodsmoke Reduction Program is part of the Great Basin Air Pollution Control District's Clean Air Projects Program funded by the 2018 Order to Pay issued by the District to the Department of Los Angeles Water and Power for non-compliance in the Phase 7a and Phase 7a Transition Area best Available Control measure Manages Vegetation. Funds from the Order to Pay have been directed by the District's Governing Board to exhaust an already-existing waiting list of woodstove replacements that was created in the last California Climate Investment program from the State of California.

The Program is designed to help households replace an uncertified woodstove, wood insert, or fireplace used as a primary source of heat with a cleaner burning and more efficient device. The replacement devices emit less greenhouse gases (GHG) and other air pollutants; they also are less likely to start fires than old stoves that may have been improperly installed. The Program will offer incentives towards the purchase and installation of the qualifying device. Town residents using uncertified woodstoves or wood inserts, manufactured before July 1, 1988, or fireplaces as a primary heat source are eligible for this Program. The incentive amount will vary depending on the household income, with some households qualifying for full replacement cost. The Program will include an educational component to ensure that households make informed decisions about how to burn and what to burn in order to maximize the efficiency of the device and minimize pollution. This Program will reduce GHG emissions, improve air quality, and protect the health, safety, and well-being of Town residents.

I. STOVE ELIGIBILITY AND PERFORMANCE STANDARDS

A. Existing Woodstove

To be eligible for the Program, applicants must be currently relying on a stove or insert that is uncertified, operational, and used as a primary source of heat in the residence. An uncertified stove or insert is one that has not been certified by the U.S. EPA to comply with the performance and emission standards as defined in Title 40 Code of Federal Regulations, Part 60, Subpart AAA, February 28, 1988, or any subsequent revisions. In order to determine if the existing stove is uncertified, applicants should do the following:

- Determine when the stove was installed. Stoves installed before July 1, 1988 do not comply with the particulate emission standards and therefore qualify for this Program.
- Check the stove model against the U.S. EPA database¹ of certified wood heaters. If the stove's manufacturer and model is not on the current and historical lists, the stove is considered uncertified.

¹ EPA-Certified Woodstove Database:

<https://cfpub.epa.gov/oarweb/woodstove/index.cfm?fuseaction=app.search>

- Check the back of the stove for a certification label. Stoves which do not have any label describing particulate matter emission standards qualify for this Program. Woodstoves certified by the U.S. EPA to comply with any of the particulate emission standards are not eligible for replacement through this Program. These stoves will have a label, similar to that pictured in Figure 1, permanently affixed to them stating that the stove is certified to comply with the 1988, 1990, 2015, or 2020 U.S. EPA standards.

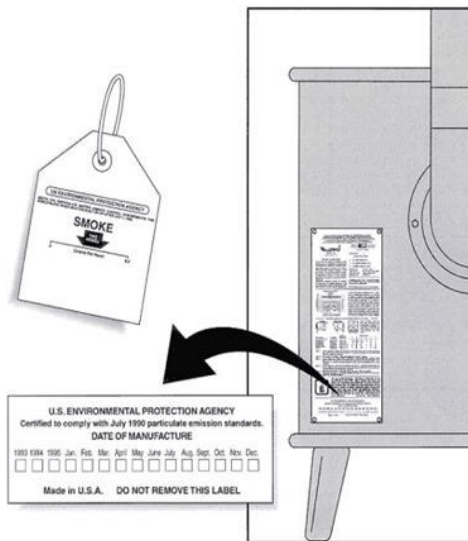
Applicants will determine the eligibility of their current woodstove. Applications will be reviewed by the Town to determine if preliminary qualification requirements have been met. The stove's eligibility will be verified by the installer during an in-home estimate.

To qualify for this Program, applicants must document using a fireplace as a primary source of heat. Section III, Eligible Home Heating Replacements, includes more information on how to qualify for this type of change-out.

Only operational devices, currently installed in a residence, and used as a primary source of heat qualify for this Program. Applicants who remove the device prior to an in-home estimate will be disqualified.

Figure 1. U.S. EPA Stove Certification Label

EPA certification label circa 1988 to present



B. Replacement Device

The uncertified woodstove or fireplace must be replaced by a cleaner-burning and more efficient alternative. Table 1 lists Program-eligible replacement devices. Only wood heating devices with particulate matter emission rates not exceeding 2.0 grams/hours,

that are certified to U.S. EPA 2020 compliance, will be eligible for the Program.² The devices listed in Table 1 are eligible for the duration of the Program.

Table 1. Replacement devices eligible for the Program

Woodstove, wood insert, pellet stove, or pellet insert with particulate matter emission rates not exceeding 2.0 g/hr, that are certified to U.S. EPA “Step 2” NSPS
Natural gas stove or insert
Propane stove or insert
Electric stove or insert
Ductless mini-split heat pump

The replacement device must be permanently installed by a professional, appropriately licensed installer participating in this Program. A list of participating installers will be established by the Town. Self-installation of heating devices will not be allowed under this Program. Portable home heating devices, not permanently affixed to the home structure, are not eligible replacement options. Any building permits or other required approvals shall be obtained per local ordinances and shall be the responsibility of the installer or the applicant. The Town will be responsible for verifying that each change-out is permitted and inspected in accordance with State or local ordinances before payment is issued to the installer.

II. ELIGIBLE CHANGE-OUTS

Applicants interested in upgrading their uncertified woodstove or wood insert to a U.S. EPA certified woodstove or other cleaner, more efficient heating device qualify for this Program if they meet all of the requirements listed below:

- Currently use wood as a primary fuel;
- Use an uncertified woodstove, currently operational, as a source of heat;
- Select a replacement device which meets eligibility in Section II;
- Have the replacement device professionally installed by a participating installer;
- Agree to receive training on proper wood storage and wood burning practices (if applicable) and device operation and maintenance; and
- Surrender their old woodstove or insert to the installer who will render it permanently inoperable and recycle it, if recycling is available in the area.

This Program provides incentives for one replacement per household. Households that previously received replacement incentives from the Town are not eligible. The Program is available for residences occupied by owners or long-term renters. In the case of long-term rental properties, formal approval from both the property owner and the renter will be required as part of the approval process. In order to qualify for an incentive, the owner

² The list of EPA Certified 2020 compliant heaters can be found at <https://cfpub.epa.gov/oarweb/woodstove/index.cfm?fuseaction=app.search>

will have to agree to not raise the rent of the unit for a period of two years or evict the unit's residents because of increased value of the unit due solely to the newly installed home heating device. Retroactive rebates are not available under this program, so applicants who remove the old device or purchase a new replacement device prior to being approved for this Program will be disqualified. The old, uncertified device must be rendered permanently inoperable and recycled, if recycling is available in the area, before payment can be issued to the installer.

Burning wood in a fireplace is very inefficient for home heating purposes; fireplaces are therefore not typically used as a primary source of heat. In rare situations, when an applicant uses a fireplace as a primary source of heat, the applicant may qualify for the Program. If the existing fireplace is structurally sound, the Program may offer an incentive to be used towards purchase and installation of a fireplace insert utilizing wood, natural gas, propane, or electricity. However, if the fireplace is lacking structural integrity, the incentive could be used towards the purchase of an eligible free-standing home heating device. In this case, the fireplace and chimney must be rendered permanently inoperable to prevent use of the fireplace. Verification of inoperability will be the responsibility of the installer.

Installers interested in participating in this Program must agree to the Program's terms and conditions by signing an agreement with the Town. In order to participate in the Program, the installer will be required to agree to the following:

- Abide by the terms and conditions of the Program;
- Verify that the old device and the replacement device qualify for the Program;
- Conduct professional installation of the qualified device in compliance with all applicable Town codes/ordinances;
- Provide residents with training on device operation and maintenance and for wood-burning devices, best practices in wood storage and wood burning; and
- Render the old device inoperable and recycle it if recycling is available in the area.

Only installers who have a signed agreement with the Town will be eligible to participate in the Program. Installers will be responsible for ensuring that all installations are done in accordance with all applicable Town codes/ordinances, including obtaining any applicable permits and having the installation inspected by the Town.

III. ELIGIBLE COST

Eligible change-out costs include the cost of the new device including sales tax, installation including any parts, materials, permits, or labor required for the safe and legal installation of the new device, and removal and disposal of the old woodstove or insert. The Town will pay the installer the approved incentive amount once the requirements have been met. Any additional balance due will be paid by the applicant.

Applicants who remove the high-polluting device or purchase a new device prior to being approved for this Program will be disqualified from participation in the Program. Woodstoves or inserts designed exclusively for aesthetic and decorative use are not eligible for this Program.

All eligible costs must be supported by appropriate documentation. Any cost that is not directly related to the change-out, including the cost of remodeling work beyond what is required to complete the change-out, is not eligible for an incentive.

IV. ELIGIBILITY

Households using uncertified woodstoves, wood inserts, or fireplaces are eligible for an incentive towards replacing their old heating device with a cleaner option. The general structure of incentives must adhere to the following rules:

- Low-income households will be eligible to receive a higher incentive (Enhanced Incentive). The maximum allowable Enhanced Incentive level is \$4,000;
- All other households, regardless of their income, will qualify for a smaller incentive (Standard Incentive) to be applied towards the purchase and installation of the new device. The maximum allowable Standard Incentive level, not to exceed \$2,000.

Every applicant using an uncertified woodstove or fireplace qualifies for a Standard Incentive without any need for income verification. To qualify for the higher Enhanced Incentive, the applicant must demonstrate a household income not exceeding a low-income threshold specified below.

- 1) 80 percent of the Statewide Median Household Income (MHI);³ or
- 2) County-specific California Department of Housing and Community Development (HCD) low-income limits.⁴

The Town will be responsible for verifying household income eligibility. The Town can qualify an applicant based on the higher allowable maximum income (80 percent MHI or HCD low-income limits).

For purposes of the Program, there are multiple methods to demonstrate household income eligibility. Applicants may demonstrate eligibility by presenting tax returns for each person living in the residence to Town personnel for verification and, if qualifying using the HCD low-income limits, reporting the number of people in the household.

³ U.S. Census Bureau, American Community Survey , 5-year Estimates available at: <https://www.census.gov/quickfacts/table/PST045215/06>

⁴ California Department of Housing and Community Development Official State Income Limits available at: <https://www.hcd.ca.gov/grants-and-funding/income-limits/state-and-federal-income-rent-and-loan-value-limits>

Eligibility may also be established through proof of participation in an existing federal or State low-income assistance program, several examples of which are listed below. In cases where an applicant chooses to demonstrate eligibility through participation in an alternate low-income program, the Town will work with the alternate program's staff to verify that the alternate program's income limits do not exceed Enhanced Incentive income limits.

- U.S. Department of Agriculture Women, Infants and Children (WIC) Program;
- U.S. Department of Health and Human Services Low Income Energy Assistance Program (LIHEAP);
- California Alternate Rates for Energy (CARE) Program with a participating California utility company.

V. APPROVAL PROCESS

Funds for the Program will be distributed on a first come, first served basis based on the order in which complete applications are received. In order to participate in the Program, applicants will be required to complete an application. Applicants must agree to provide information to the Town and allow the Town and/or installer to verify that information. Applicants must agree to receive training on proper wood storage and wood burning practices (if applicable) and device operation and maintenance. The Town or installer will be responsible for verifying the following:

- Eligibility of the existing device - ensuring that the existing woodstove, wood insert, or fireplace is uncertified, operational, and used as a primary heat source in the house;
- Eligibility of the replacement stove – ensuring that the replacement device is eligible for the Program as described in Section II; and

The application will be reviewed to determine if the preliminary qualification requirements have been met. Figure 2 (next page) illustrates the approval process and helps determine Program eligibility. The Town will notify the applicant whether the application was approved for participation in the Program. Applicants should be aware that applications will be treated in accordance with Public Records Act requirements and that certain information, subject to those requirements, may be publicly disclosed.

Once approved, the applicant will schedule an in-home estimate with a participating installer. The installer will verify the stove's eligibility and present an estimate to the applicant. Applicants are issued vouchers by the Town that provide an instant discount of the cost of purchase, installation, and disposal of a qualifying device. Installers must assert that the old device was eligible, deemed permanently inoperable, and recycled if recycling is available in the area, before the Town will issue payment for the change-out.

VI. EDUCATION

The Program requires an educational component to ensure that the new home heating devices, particularly woodstoves, are properly operated and maintained to maximize energy efficiency and achieve the lowest possible emission rates. With proper burning techniques and properly seasoned wood, the amount of wood used could be significantly reduced. While a new woodstove typically pollutes less than an old one, user operation is important for achieving estimated reductions. The Town requires verification that the installers have trained homeowners following the installation.

