Attachment E

Siskiyou County

Woodsmoke Reduction and Heating Replacement Program Guidelines

Fiscal Year 2021/2022 and 2022/2023

Siskiyou County Community Development Department 12-1-2021

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Woodsmoke Reduction and Heating Replacement Program

Executive Summary

The Woodsmoke Reduction and Heating Replacement Program offers a voucher valued up to \$8,000 to low-to moderate-income homeowners living in the unincorporated areas of Siskiyou County ("County"), to replace old, inefficient, and highly polluting wood stoves, wood inserts, or fireplaces with safer, cleaner-burning and more efficient home heating devices. Unincorporated County residents using uncertified wood stoves or wood inserts or fireplaces as their primary heat source may be eligible for a voucher towards the purchase and installation of qualifying devices depending on household income.

The Program is designed to help low-to-moderate income households with the ability to replace an uncertified or prior to 2020 certified wood stove or wood insert, or a fireplace used as a primary source of heat with a safer, cleaner burning and more efficient device. The replacement devices emit less greenhouse gases (GHG) and other air pollutants and are less likely to start fires than old stoves that may have been improperly installed. The Program will offer a voucher toward the purchase and installation of a qualifying device and include an educational component to ensure eligible households properly operate the new device and make informed decisions about how to burn and what to burn in order to maximize the efficiency of the device and minimize pollution.

I. Program Goals and Objectives

The Program furthers the goals of expanding the supply of decent, safe, sanitary and affordable housing, and Health and Safety Code Division 25.5 and reduces GHG emissions by offering a voucher toward the replacement of existing uncertified residential wood burning devices used for space heating with cleaner options. For the purpose of this Program, a stove refers to a permanently installed free-standing wood stove, pellet stove, propane stove, or electric stove or one installed in a masonry fireplace cavity or other enclosure (commonly referred to as an insert).

To be eligible for the Program, you must be a homeowner (for the purpose of this document referred to as "Applicant") must currently use an uncertified or certified prior to 2020 wood stove, wood insert, or fireplace as a heat source. The property must be located in an unincorporated area of Siskiyou County. Applicant household income must be at or below 80% of the Area Median Income for household size as reflected in Exhibit A, State CDBG Income Limits, which is subject to change as updated by the State. The existing uncertified or certified prior to 2020 wood stove, wood insert, or fireplace must be replaced with a certified wood stove, pellet stove, propane stove, electric stove, or ductless mini-split heat pump.

The replacement device must be installed by a professional, appropriately licensed stove installer (Contractor) and meet local fire and building codes. A professionally installed device will improve the health, safety, and comfort of all residents. To ensure reductions in emissions are permanent, any stove removed through this Program must be rendered permanently inoperable and recycled. The Program will include outreach and educational components to both inform residents about the benefits of switching to cleaner burning home heating devices and train them on the proper operation and maintenance to maximize the device efficiency and minimize pollutant emissions.

II. Stove Eligibility and Performance Standards

A. Existing Home Heating Devices

To be eligible for the Program, the Applicant home must have a wood stove or insert, or fireplace that is not compliant with current EPA standards.

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, Applicant may do the following:

• Determine when the stove was installed. Stoves installed before May 2020 do not comply with current particulate emission standards and therefore qualify for this Program.

• Check the stove model against the U.S. EPA Certified Wood Heater Database at cfpub.epa.gov/oarweb/woodstove/woodheaters and the Historical List of Certified Wood Heaters. If the stove's manufacturer and model is not on the current and historical lists, the stove is considered uncertified.

• Check the back of the stove for a certification label (see Figure 1 below). Stoves which do not have any label describing particulate matter emission standards qualify for this Program.



Figure 1. U.S. EPA Stove Certification Label

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

An Applicant using a fireplace as a primary source of heat could also qualify for this Program. Eligible Home Heating Replacements under **Eligible Change-Outs** below, includes more information on how to qualify for this type of change-out.

B. Replacement Device

The uncertified wood stove or insert, or fireplace, must be replaced by a cleaner-burning and more efficient alternative. Only wood heating devices with particulate matter emission rates not exceeding 2.0 grams/hours, that are certified to U.S. EPA "Step 2" NSPS, will be eligible for the Program.¹ The replacement device must be permanently installed by a professional, appropriately licensed installer procured by Siskiyou County for participating in this Program. Self-installation of heating devices is not 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 the County Building Department and shall be the responsibility of the Contractor. The County will verify that each change-out is permitted and inspected in accordance with State or local ordinances before payment is authorized.

III. Eligible Change Outs

Applicants must meet all of the requirements listed below:

- Use an uncertified, or certified prior to 2020, wood stove or wood insert, or a fireplace, as a source of heat;
- Select a replacement device which meets stove eligibility
- Plan to have the replacement device professionally installed by a participating Contractor;
- Agree to receive training on proper wood storage and wood burning practices and device operation and maintenance; and
- Surrender their old wood stove or insert to the Contractor who will render it permanently inoperable and recycle it.

This Program provides a voucher for one replacement per eligible household in an unincorporated area of the County. Households that previously received Program incentives and/or vouchers are not eligible.

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 before payment can be issued to the contractor.

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 will qualify for the Program. If the existing fireplace is structurally sound, the Program will offer a voucher to be used towards the purchase and installation of a fireplace insert utilizing wood, kerosene, propane, or electricity. However, if the fireplace is lacking structural integrity, the voucher 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.

¹The list of Step 2 compliant heaters can be found at, <u>https://www.epa.gov/compliance/epa-certified-wood-heater-database</u> or in this link: <u>EPA Certified Wood Heater Database</u>.

IV. Contractors

Contractor(s) interested in participation in this Program must agree to the Program's terms and conditions by signing an agreement with the Siskiyou County Community Development Department pursuant to a competitive Request for Proposal (RFP) procurement process.

Only Contractor(s) who have a signed agreement with the County will be eligible to participate in the Program. The Contractor will be responsible for ensuring that all installations are done in accordance with any applicable State or County codes/ordinances, including obtaining any applicable permits and having the installation inspected.

V. Eligible Costs

Eligible 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 recycle/disposal of the old wood stove or insert. The Contractor will be required to provide a base estimate for the installation of a basic model that will be safe, clean-burning, and efficient. Upgrades above the base estimate will be paid by the Applicant. The total voucher amount is limited to a maximum of \$8,000 per property. Any costs exceeding the voucher amount will be paid by the Applicant.

Wood stoves 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 cost of remodeling work beyond what is required to complete the change-out, is not eligible for a voucher.

VI. Eligibility

Households using uncertified wood stoves, wood inserts, or fireplaces as a primary heat source are eligible for a voucher towards replacing their old heating device with a cleaner option. The voucher amount will be determined by the County, but cannot exceed \$8,000. Other eligibility requirements include:

- Home must be owner-occupied;
- Home must be located in an unincorporated area of the County;
- Household income cannot exceed 80% of the Area Median Income for the applicable household size (see Exhibit A). Income level will be determined by County staff using the U.S. Housing and Urban Development Part 5 methodology, which requires documentation to verify income level including W-2's, paystubs, bank statements, etc.

VII. Approval Process

- 1. Applicant submits completed Program Application and documentation required to verify eligibility.
- 2. County reviews application submission and notifies Applicant of preliminary approval.
- 3. Applicant schedules appointment with Contractor for in-home estimate and signs approval of the final estimate.
- 4. Contractor submits estimate and scope of work to County.

- 5. County conducts environmental review for NEPA clearance.
- 6. County conducts final review then approves and issues voucher to Applicant.
- 7. Applicant signs contract with Contractor.
- 8. Contractor completes the project.
- 9. Applicant signs required documents and provides to Contractor.
- 10. Contractor submits reimbursement packet to County.
- 11. Applicant pays Contractor directly for any ineligible costs or costs exceeding voucher amount.

VIII.GHG Reductions

Switching from an uncertified, or certified prior to 2020, wood stove or a fireplace to a U.S. EPA certified wood stove reduces GHG emissions as certified stoves are cleaner burning and more energy efficient. Design features in newer wood stoves promote more complete combustion, reducing emissions of methane, a GHG pollutant.³ They also typically use a third less wood to produce the same amount of heat as an uncertified stove.⁴

A one-third reduction in wood burning will further reduce GHG emissions by approximately the same amount. In the absence of a mechanism to verify that the wood burned in an Applicant's primary heating device is waste material harvested pursuant to an approved timber management plan prepared in accordance with the Z'berg-Nejedly Forest Practice Act of 1973 or other locally or nationally approved plan and harvested for the purpose of forest fire fuel reduction or forest stand improvement, biogenic CO2 is included in the calculation of GHG benefits for these devices.

IX. Outreach and Education

The County will promote the Program and help households understand the benefits of changing from an uncertified wood stove to a safer and cleaner home heating device. The Program requires an educational component to ensure that the new home heating devices, particularly wood stoves, 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 County will ensure that each change-out is supplemented with a training component.

³Residential wood stove emissions are in AP 42, Fifth Edition, Volume I, Chapter 1, External Combustion Sources, Section 1.10, <u>web link</u>.

⁴U.S. EPA Burn Wise Publication, Wood Smoke Awareness Kit Fast Facts, https://www.epa.gov/burnwise/burn-wisehealth-and-safety-awareness-kit; web link.

X. Co-Benefits

In many communities throughout the State, uncertified wood stoves are a major source of air pollution. Replacing these highly polluting and inefficient stoves with cleaner home heating options can significantly reduce emissions of fine particulate (PM_{2.5}), black carbon, and toxic air contaminants. These emission reductions will vary depending on the type of the replacement device, with the natural gas, propane, or electric devices offering the greatest reductions.

Certified wood stoves or inserts have significantly lower emissions compared to uncertified stoves. These emission reductions, however, could diminish due to improper operation or lack of proper maintenance. Reductions in black carbon, PM_{2.5}, and toxic air contaminants will reduce the impacts of climate change and improve indoor and outdoor air quality and visibility. In some parts of the State, the PM_{2.5} co-benefit reductions could have a significant impact on a region's ability to attain ambient air quality standards.

Reductions in $PM_{2.5}$ pollutions will have significant short- and long-term health benefits. Short-term exposures to $PM_{2.5}$ can aggravate lung disease, causing asthma attacks and acute bronchitis, and may also increase susceptibility to respiratory infections. Long-term exposures have been associated with reduced lung function and the development of chronic bronchitis and even premature death.

Consumers should be able to save approximately 20 percent of their annual fuel cost through the use of professionally installed, certified, high efficiency wood stoves. ⁵

Many old stoves are improperly installed, posing significant safety concerns, including health impacts and potential fires. Professional installation required under this Program will ensure that newly installed stoves meet local fire and building codes. If a replacement device is installed in a residence that does not have functional smoke and carbon monoxide detectors, the Program may pay for purchasing and installing new detectors. The Program may support the local economy and job creation by increasing demand for, and installation of, certified wood stoves and other clean heating devices.

XI. Records to be Maintained

The County shall maintain all records required by <u>24 CFR §570.506</u>. Such records shall include but are not limited to:

a.) Records providing a full description of each activity undertaken and its CDBG eligibility, including its location, client name, income level and/or other basis for determining eligibility, estimates, description of service provided, and the amount of CDBG Program Income funds budgeted, obligated, and expended for the activity;

b.) Records demonstrating that each activity undertaken meets the CDBG National Objective of benefit to low- and moderate-income households. (i.e. the criteria set forth in <u>24 CFR</u> <u>§570.208</u>);

⁵ Based on the difference in efficiency between uncertified and certified stove; https://www3.epa.gov/ttn/chief/ap42/ch01/final/c01s10.pdf; <u>web link</u>.

c.) Records for each activity carried out for the purpose of providing or improving services and programs which is determined to benefit low- and moderate-income persons including the total cost of the activity, including both CDBG and non-CDBG funds and the size and income and eligibility of each person or household;

e.) Records documenting compliance with all Fair Housing and Equal Opportunity regulations including the extent which each racial and ethnic group and single headed households have applied for, participated in or benefitted from any program or activity;

f.) Financial records, in accordance with the applicable requirements in <u>2 CFR 200</u> and <u>24</u> <u>CFR §570.502</u>, including source documentation for entities not subject to 2 CFR 200; all documents for all transactions that demonstrates how funds are expended, including but not limited to and to the extent applicable, invoices, schedules containing comparisons of budgeted amounts and actual expenditures, and /or other documentation appropriate to the nature of the activity;

g) Other records necessary to document compliance with <u>Subpart K of 24 CFR part 570</u> for procurement documents;

h) Copies of all third-party agreements/contracts for the performance of work to be undertaken within the scope of the Program along with documentation concerning the selection process;

i.) Records are to be retained for five years from the date of closeout of the grant; unless there is litigation, claims, audit, negotiation, or other actions involving the records, which has started before expiration of the 5-year period per 24 CFR \$570.502 (a)(7). In such cases, the records must be retained until completion of the action and resolution of all issues which arise from it or the end of the regular 5-year period, whichever is longer.

Please note that the above descriptions are brief and provide only a summary of the records the County is required to maintain. The County agrees to consult with 2 CFR part 200 and 24 CFR §570.506 for a detailed description of the required records.

XII. Access to Records

Representatives of Department of Housing and Urban Development (HUD), California Housing and Community Development (HCD) or other authorized governmental agencies have the right of access to any pertinent records pertaining to administration, receipt and use of CDBG funds, and necessary documents to facilitate such reviews and audits.

APPENDIX A

State CDBG Income Limits Siskiyou County

Income Limits by Household Size - Effective June 1, 2021

Area Median Income (AMI):		\$ 70,700	
Household Size	Extremely Low Income (30% of AMI)	Low Income (50% of AMI)	Moderate Income (80% of AMI)
1	14,650	24,400	39,050
2	16,750	27,900	44,600
3	18,850	31,400	50,200
4	20,900	34,850	55,750
5	22,600	37,650	60,250
6	24,250	40,450	64,700
7	25,950	43,250	69,150
8	27,600	46,050	73,600