

United States Senate
WASHINGTON, DC 20510

January 7, 2015

The Honorable Shaun S. Donovan
Director, Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

Dear Director Donovan,

I am writing to express my continued concern over the Environmental Protection Agency's (EPA) proposal to update the New Source Performance Standard for Residential Wood Heaters. As I have previously expressed in a letter to the EPA, while I strongly support the EPA's mission to update these regulations for the first time since 1988, the current path that EPA is taking runs counter to the larger goal of reducing particulate matter emissions and improving public health. As you review the EPA's proposal I ask that you consider a more realistic approach to evaluating the costs and benefits of the rule.

It is my understanding that the EPA's proposal would set an initial emissions target of 4.5 grams per hour of particulate matter that would ultimately decrease to 1.3 grams per hour. In choosing these aggressive reduction targets, it seems the EPA is not fully considering the impact that the proposed rule would have on the market by raising prices for new stoves and thereby increasing the likelihood that consumers will hold on to their older, dirtier stoves. While the rule may create cleaner and more efficient woodstoves, it would also raise the price of individual units to a level that I fear would be prohibitively expensive for many homeowners. Cleaner stoves sitting on the showroom floor do nothing for cleaner air.

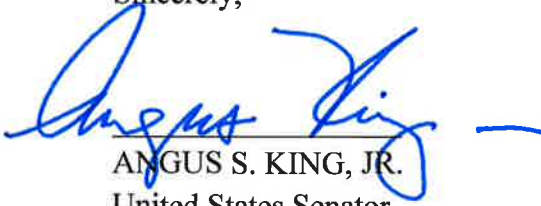
Therefore, I would like to see a new approach using an analysis that does not simply calculate the manufacturing costs associated with compliance and then supposes that this will not impact future sales. I believe that each additional dollar of compliance cost will be paid for by consumers. The analysis that I request should look at the larger context of the rule, and the effect that strengthening the standards for woodstoves will have on consumer demand and the resulting decrease in older stoves being replaced.

In addition, I understand that the rule also includes significant changes to the testing methods required to obtain certification, and then poses an unrealistic 60-day timeline for manufacturers to bring their products into compliance. This must be addressed in any final rule in order to make it remotely viable.

Countless homes in Maine rely on wood as a source of heat but an overwhelming number of woodstoves currently in use predate even the 1988 standards. Encouraging consumers to trade in these old units would likely produce significantly greater benefits than this existing proposal.

I hope you will scrutinize this rule and realistically analyze the real-world impact that it will have. I believe it will be counter to our mutual goals of cleaner air and healthier people. I look forward to seeing a new analysis of the rule's costs and potential benefits, including an analysis of the impact on future sales of compliant woodstoves and retention levels of older, dirtier stoves.

Sincerely,



ANGUS S. KING, JR.
United States Senator