

March 6, 2018

RE: Oppose HR 453 (Now Section 3 of HR 1917 – BRICK Act)

Dear Representative,

On behalf of our millions of members and supporters, we write to express opposition to H.R. 453, the Relief from New Source Performance Standards Act of 2017. If enacted, this legislation would needlessly delay stronger emission limits for new woodstoves and boilers that would better protect millions of Americans from a host of hazardous and toxic air pollutants – including particulate matter (soot), nitrogen oxides, volatile organic compounds (VOCs), and carcinogens like benzene and formaldehyde.

In 2015, as required by the Clean Air Act, the Environmental Protection Agency (EPA) took action to improve air quality and protect public health by updating performance standards for new wood-burning stoves, boilers and furnaces. These standards had remained unchanged since 1988 and did not reflect the availability of improved wood heater technologies that reduce emissions and increase efficiency. These stronger standards apply only to newly manufactured heaters and do not affect indoor fireplaces, existing in-home wood-burning furnaces, outdoor fireplaces, barbecues, or pizza ovens. Despite the narrow focus, once implemented, the updated standards will reap significant emissions reductions, better guarding communities against dangerous air pollution and helping many counties comply with health-based National Ambient Air Quality Standards (NAAQS) for fine particulates and ground-level ozone. EPA estimates that the updates will cost approximately \$46 million, but will deliver \$3.4 to \$7.6 billion in public health benefits, meaning a net benefit of \$74 to \$165 for every dollar spent on compliance.

H.R. 453 would delay compliance with these already long-overdue updates by an additional 3 years, until May 15, 2023, despite affected industries having already been granted an unusually long phase-in window of 5 years. The updates were crafted transparently after significant input from the public and industry. In addition to the extended compliance window, EPA also included provisions to accommodate manufacturers, including a retailer sell-through provision and alternative compliance options. The agency also noted that nearly one-fifth of the boilers and heaters on the market meet the stronger standards. Industry representatives have claimed that to meet the 2020 standards, they will need to have their products certified by this summer. Accordingly, delaying compliance just as manufacturers should be winding down their work to comply rewards bad actors at the expense of those in the industry that have already made forward-looking investments to improve their products and better protect their consumers.

The harmful effects of this bill would be experienced for years beyond passage, as the devices sold in the proposed delay window would continue to unnecessarily pollute for decades to come. The result would be avoidable public health harms and premature deaths. We urge you to support EPA's updated standards for woodstoves, which will save lives and billions of dollars, and reject this misguided and unnecessary legislation.

Sincerely,

Center for Biological Diversity
Earthjustice
Environmental Defense Fund
League of Conservation Voters
Natural Resources Defense Council
Save EPA
Sierra Club