



May 25, 2023

Dana Papke Waters
Air Pollution Specialist
California Air Resources Board
Sustainable Transportation and Communities Division
1001 I Street
Sacramento, CA 95814

Re: Comments on Zero-Emission Appliance Standards Workshop

Dear Ms. Papke Waters:

On behalf of the American Lung Association, I am writing to provide additional comments on the California Air Resources Board's (CARB) May 10, 2023 workshop on zero-emission appliance standards. This is an important measure for California's efforts to meet health-protective National Ambient Air Quality Standards for Ozone. We call on CARB to maintain an ongoing focus on the equity components of this rulemaking raised during the workshop, and to build in strong oversight and attention to this critical consideration during the rulemaking, prior to and throughout implementation.

The American Lung Association's "[State of the Air](#)" 2023 report found that Californians face the most difficult air pollution challenges in the United States, with 98 percent of Californians living in communities impacted by ozone and/or particle pollution. California communities represent six of the ten most ozone-polluted cities in America. Breathing ozone pollution can contribute to a wide range of negative health consequences, including asthma attacks, increased likelihood of reproductive and developmental harm, increased risk of metabolic disorders, and other impacts including premature death.

The American Lung Association recently [conducted research](#) looking at the impacts of combustion within the home on indoor air quality and human health. The research showed that a number of emissions from combustion-powered appliances have negative impacts on human health, including increased asthma attacks, and other health harms, particularly among vulnerable populations. A transition to zero-emission appliances will mitigate these emissions and have a positive impact on air quality and health.

To fully maximize the quality of air indoors and outdoors, mitigate climate change, and fully protect health, the shift to zero-emission technologies must be made with a clear and coordinated focus on equity in the design of policies, investments and incentive programs to take full advantage of this opportunity to build healthier homes for all. We offer the following to build upon comments made at the workshop:

Meeting SIP Timelines and Commitments

As included in the State Implementation Plan (SIP) for Ozone, the zero-emission appliance standards are scheduled to reduce ozone-forming oxides of nitrogen by 15.2 tons per day by 2037. This measure represents approximately ten percent of all reductions to needed through CARB standards and must be met on the schedule laid out in the SIP with adoption targeted for



2026 and implementation for 2030. By keeping to the SIP schedule of adoption in 2026, a four-year window will allow for greater cross-agency planning, stakeholder engagement and community education and readiness planning to ensure success. As noted during the SIP process we also encourage an expanded scope of the rule to include stoves and other appliances beyond space and water heating.

Coordinating across Agencies

We appreciated the inclusion of other state and local agencies in the introductory panel of the workshop. We believe that there is an ongoing need for clearly articulated coordination between all relevant agencies to ensure the success of these measures. Coordinated efforts will be vital to ensuring that the standards, incentive programs, building codes, grid readiness in all communities, education outreach and other factors work in unison to ensure the health benefits of implementation reach all communities equitably.

Building Equity into Implementation

As many commenters noted in the workshop, equitable implementation of the program will be key to success. We call on CARB to continue to engage equity advocates and community members in the development of the program to ensure ongoing attention is paid to addressing potential barriers related to language, income urban/rural considerations and other factors. We believe that a robust pre-implementation coordination process to evaluate barriers, opportunities, funding and technology readiness in varying contexts will be critical to ensuring successful implementation of the program.

Zero emission appliance standards have the potential to drive NOx reductions, protect air quality and mitigate climate change for all households. We look forward to continued engagement with the staff and stakeholders on this important program to reduce harmful air pollution and ensure all communities benefit from non-combustion technologies. Please contact me with any questions at William.Barrett@Lung.org.

Sincerely,

Will Barrett
National Senior Director
Clean Air Advocacy