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To: California Air Resources Board

Re: Zero-Emission Space and Water Heater Standards – Request to Exclude Hearth Products

Thank you for the opportunity to comment on the Zero-Emission (ZE) Space and Water Heater rulemaking. The revised proposal presented at the December 2025 workshop, which contemplates a sales mandate on manufacturers with increasing ratios of all-electric to combusting space and water heaters up to 2,000,000 Btu/hour input beginning January 1, 2030, raises several concerns for the hearth industry.

First, CARB staff have indicated that draft regulatory language will not be available until Q1 2026, yet public comments are due January 14, 2026, and draft language is not available for public access. This makes it impossible for affected stakeholders to evaluate the actual proposed text and understand whether hearth products are included or excluded in the final scope.

Second, the workshop slide language that “equipment with a rated heat input capacity up to 2,000,000 Btu/hour must comply with emissive sales limits (%) starting on January 1, 2030” appears to set only an upper bound, without a lower capacity limit. As written, this could be interpreted to encompass all space-heating equipment below that threshold, including decorative and supplemental hearth appliances that were not intended in earlier iterations, which focused on furnaces, boilers, and water heaters.

In addition, there is concern that the proposed ZE framework once again fails to evaluate emissions on a full fuel-cycle basis. Instead of accounting for source energy emissions associated with electricity generation, transmission, and distribution, the proposal appears to focus narrowly on on-site (site) emission reductions only. This approach risks overstating the benefits of electrification in regions and time periods where the grid mix remains carbon- and criteria-pollutant intensive, while understating the performance of clean-burning, high-efficiency natural gas and propane hearth appliances used for supplemental heat.

Hearth products are fundamentally different from the central systems this rule is targeting. They are:

- Designed and used primarily as supplemental or zone heaters, not as primary whole-building space-heating systems.
- Already highly regulated, with modern products meeting stringent federal EPA certification requirements (for solid fuel) and high-efficiency, clean-burning standards for gas and propane, resulting in very low emissions compared to legacy equipment.
- Often installed as part of incentive or change-out programs to replace higher-emitting wood-burning appliances, as seen in the South Coast AQMD and San Joaquin Valley AQMD.

The South Coast AQMD process is instructive. When SCAQMD pursued zero-NO_x concepts for furnaces and water heaters, hearth stakeholders participated and made clear that decorative and supplemental hearth products should not be treated as central HVAC systems. SCAQMD ultimately did not include hearth products in its furnace and water-heater rule, and is now implementing an incentivized change-out program in which clean, efficient hearth products including natural gas and propane appliances, along with EPA-Certified wood and pellet appliances, are part of the solution rather than part of the problem.

In contrast, CARB's current ZE framework is structured as a sales mandate on manufacturers with extensive reporting obligations, including requirements to report all equipment sales for year-end 2028 and annually thereafter by category. CARB has an established pattern of treating manufacturers, distributors, or "responsible parties" as regulated entities with mandatory product and sales reporting across various programs, and expanding that structure to all appliances under 2,000,000 Btu/hour without clear exclusions would impose disproportionate administrative burdens on hearth manufacturers and distributors.

Every opportunity should be taken to clarify that hearth products are not within the intended scope of this ZE rule for central space and water heating. Natural gas and propane hearth appliances are clean-burning, high-efficiency supplemental heaters that:

- Provide targeted zone heat, which can allow lower thermostat settings on primary systems and reduce overall home energy use.
- Offer resilient heat during grid outages and extreme weather, particularly in rural and wildland–urban-interface areas where electric infrastructure is vulnerable.
- Represent responsible, efficient technology that has already contributed to improved air quality by replacing older, higher-emitting appliances.

Accordingly, the rulemaking should:

1. Clearly and explicitly define the covered categories as central space-heating and water-heating systems (e.g., furnaces, boilers, water heaters) and expressly exclude decorative/supplemental hearth products from ZE sales mandates and related reporting obligations; and
2. Recognize the environmental and resilience benefits of modern natural gas and propane hearth appliances as clean-burning, high-efficiency supplemental heating options, rather than treating them as primary heating systems.
3. Evaluate and disclose both site and source energy emissions impacts and avoid policies that treat all on-site combustion as inherently inferior to electric options regardless of upstream fuel-cycle performance.

Without these clarifications, a broad "all equipment under 2,000,000 Btu/hour" approach risks unintentionally capturing hearth products, imposing unnecessary reporting burdens, reducing consumer choice, and undermining ongoing efforts to use efficient hearth appliances as part of change-out and air-quality improvement programs.

Thank you for considering these comments and for ensuring that the ZE Space and Water Heater standards are narrowly tailored to their intended targets while preserving responsible, efficient hearth products used for supplemental heating.

Sincerely,

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Government Affairs