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January 20, 2026

California Air Resources Board (CARB)
1001 I Street
Sacramento, CA 95814

Re: Comments on Revised Proposal for Zero Emissions Space- and Water-Heating Standards

Dear CARB Staff,

On behalf of the Green & Healthy Homes Initiative (GHHI), the nation's largest healthy housing nonprofit organization, I am writing to provide comments on the revised regulatory proposal for Zero-Emission Space and Water Heater Standards as presented in the public workshop on December 11, 2025. GHHI aims to eradicate the negative health impacts of unhealthy housing for children, seniors, and families to ensure everyone has the opportunity to live, learn, work, and play in homes that support their health and well-being.

While we appreciate CARB's ongoing efforts to address appliance pollution, GHHI is concerned about the revised regulatory proposal from the perspective of improving air quality and public health. We are concerned that the shift from a 100% zero-emission sales requirement to a system of sales targets combined with a credit system significantly lowers the ambition of this critical policy. This will ultimately result in more emissions of air pollutants from space and water heating appliances and, consequently, greater harm to public health than the paths previously considered by staff.

The revised proposal would result in greater lifetime emissions and fewer health benefits. The previous 2022 State SIP Strategy concept aimed for 100% zero-emission sales by 2030. The current proposal replaces this with "gradual, achievable limits" that allow for the continued sale of polluting, emissive equipment well into the future. If CARB is to move forward with the sales target system, adopting stronger sales targets as outlined in Alternative 2 would result in much needed health benefits. The current proposal achieves only 39 MMT CO₂e in cumulative GHG reductions, compared to 69 MMT CO₂e under the more stringent Alternative 2. This loss in potential emission reductions represents a missed opportunity to achieve substantial public health benefits; **to quantify these benefits using different values of the Social Cost of Carbon (SCC), Alternative 2 would achieve \$5.7 billion more in benefits using a SCC of \$190/ton,**

and \$1.53 billion more with a SCC of \$51/ton. These billions of dollars of lost value represent public health costs, climate damages, and lost productivity due to higher emissions.

We believe that it is possible to both protect vulnerable communities from potential affordability impacts, while still installing strong targets that will phase out harmful combustion appliances that pose disproportionate threats to these communities. Allowing for continued emissive sales through a flexible credit system risks prolonging the presence of combustion appliances in the very disadvantaged communities that already suffer from the highest rates of asthma and other respiratory conditions. Moreover, the Bay Area Air District is showing through its development of flexibility measures that it is possible to set ambitious zero emissions appliance standards and allow flexibility for low-income households, including providing exemptions to low-income households based on self-attestation of income.

Instead, CARB's revised proposal relies heavily on a credit system to address end-user challenges. While addressing flexibility and affordability is crucial, we believe that providing gradual limits and trading mechanisms lowers the regulatory pressure needed to drive the market-wide transformation essential for health equity. Instead of weakening the standard, CARB should maintain a 100% zero-emission target while simultaneously strengthening the implementation planning and incentive programs mentioned in the workshop to close affordability gaps for low-income households.

GHHI believes that a 100% zero-emission sales requirement is what is needed to provide the public health protections and emission reductions that California's communities deserve. We urge CARB to return to its more ambitious regulatory concepts to ensure that all Californians, regardless of income, can live in homes free from the hazards of combustion pollution. Barring a return to that policy design, we recommend that CARB increase the sales targets and accelerate the timeline to achieve more reductions in harmful emissions, such as Alternative 2 from the staff workshop. We believe that zero emissions space and water heating technology is mature enough, and that supporting programs can be designed effectively enough, for an ambitious zero emissions appliance standards policy to be a win-win for California's communities.

Thank you for the opportunity to comment.

Sincerely,

Signed by:



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Ruth Ann Norton

President & Chief Executive Officer

Green & Healthy Homes Initiative (GHHI)