



August 23, 2022

California Air Resources Board
1001 I St #2828
Sacramento, CA 95814

Sierra Club California Comment on the 2022 State SIP Strategy

Dear Austin Hicks and Ariel Fidely,

We first want to thank staff for all their work on the State Implementation Plan (SIP). We strongly support the SIP's overall efforts to transition California away from combustion to zero emission technologies.

Specifically, Sierra Club CA's comments focus on the proposed zero emission water and space heater standard. SC CA applauds the updated SIPs' commitment to equity-centered engagement and community input at all stages of the zero-emissions standard implementation process. These commitments will protect historically underserved and overlooked communities' health, safety, and financial security. Additionally, the proposed SIP will reduce the building sector's carbon footprint and help CA attain AB 32-mandated GHG reduction goals. We reinforce our support of CARB taking a lead in requiring that only emissions-free space and water heaters are sold in 2030.

The proposed SIP institutes several requisite undertakings; however, SC CA encourages CARB to consider the following recommendations for the updated SIP or in future regulations, including:

- It's vital to consider requiring no-NOx emissions for other gas end uses, as expanding the zero-emissions standard to commercial cooking and clothes drying can decrease NOx and GHG emission reductions by one-fourth.¹

- As CA electrifies the building sector, underserved communities will be financially responsible for gas-fueled appliance upkeep. Therefore, the updated SIP should consider incentivizing and subsidizing electric appliance acquisition beyond space and water heating to decrease stranded asset risk in underserved communities.
- At a future date, it is essential to consider NOx regulations for existing gas appliances, requiring appliance retrofits for existing buildings before appliances lose function, since devices may take decades to malfunction. It is challenging to estimate end-of-life for some appliances and long-term costs increase with fragmented appliance installation approaches.

Sincerely,

Sakereh Carter, M.A.
Senior Policy Advocate
Sierra Club California

¹ CARB, *2022 State Strategy for the State Implementation Plan: Draft Measures Workshop*, slide 96 (Oct. 19, 2021), https://ww2.arb.ca.gov/sites/default/files/2021-10/2022_SSS_October_Workshop_Presentation.pdf.