

Jennifer Elwell

From: David Moller <david@mollers.us>
Sent: Monday, November 1, 2021 1:34 PM
To: BAAQMD Comments; Jennifer Elwell
Subject: Public Comment: Amendments to Regulation 9, Rule 4 & 6

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Attn: Jennifer Elwell, Senior Air Quality Engineer

Dear Bay Area Air Quality Management District:

This is to express strong support for the proposed Zero NOx amendments to Regulation 9, Rules 4 and 6 for water and space heaters. This bold action is a critical step to reduce and ultimately eliminate the use of natural gas for water and space heating in existing as well as new buildings in the Bay Area.

My understanding is the amendments will be enforced in the nine Bay Area counties at the point of sale with the following enforcement dates:

- January 1, 2027, for storage tank water heaters 75,000 BTU/ hour or less
- January 1, 2029, for furnaces less than 175, 000 BTU/hour
- January 1, 2031, for gas-fired boilers, storage tank water heaters, or instantaneous water heaters from 75,000 BTU/hour to 2 million BTU/hour

My one comment is that **the enforcement dates are not soon enough!** The technology is available now and manufacturers and installers are clearly starting to gear-up for this change driven in part by growing consumer demand, but more significantly by the all-electric requirements for new buildings adopted by all of the Bay Area's major jurisdictions and the heat pump baselines and electric-ready requirements adopted by the CEC effective January 1, 2023.

We don't need, and can't afford to wait another five, seven or nine years for the new Zero NOx requirements to become effective. Please move these dates forward, perhaps with exceptions if unresolvable supply or equity issues actually do arise, or at the very least add strong incentives for early compliance. There certainly is no need for such long lead times for installation training as most installers already know or can easily learn needed installation techniques. The proposed amendment to reduce allowable NOx emissions from 40 to 14 nanograms effective July 1, 2023 for furnaces less than 175, 000 BTU/hour is a step in the right direction, but seems insufficient.

We need emergency action to address our worsening climate emergency! Thank you again for taking such action.

Best regards,

David Moller, P.E.

