APPENDIX A

Summary of Significant Comments and Responses
For Proposed Amendments to Rule 4905
(Natural Gas-Fired, Fan-Type Residential Central Furnaces)
December 16, 2021
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SUMMARY OF SIGNIFICANT COMMENTS
DRAFT AMENDMENTS TO RULE 4905
(NATURAL GAS-FIRED, FAN-TYPE RESIDENTIAL CENTRAL FURNACES)
November 18, 2021

The District held a public workshop to present, discuss, and receive comments on the draft amendments to Rule 4905 on November 18, 2021. Summaries of significant comments received during the public workshop and associated comment period are summarized below.

Comments were received from the following:
David Stephens, Johnson Controls (JCI)
Michael Kalmbach, Johnstone Supply (JS)
Cynthia Pinto-Cabrera, Central Valley Air Quality Coalition (CVAQ)

1. **COMMENT:** Thank you for consideration of this rule change, we wholeheartedly support it. We encourage you to continue to reduce NOx emissions, but the pandemic has caused serious disruptions to the supply chain and personnel, as well as the Department of Energy requirements for energy efficiency by January 1, 2023. This has created a series of issues that we feel this rule change does support. (JCI)

   **RESPONSE:** The District thanks you for your comments.

2. **COMMENT:** The inventory of appliances manufactured before the September 30, 2021 deadline is zero. We are out of manufactured housing furnaces and do not have any replacements to sell and to support contractors installing those in manufactured housing. Suppliers need the extension to continue serving the affordable housing market during this winter season. We urge you to amend the rule as quickly as possible. (JS)

   **RESPONSE:** The District thanks you for your comments.

3. **COMMENT:** Is the District going to adopt regulations requiring the transition to electrification and consider incentives for electrification of furnaces? (CVAQ)

   **RESPONSE:** The District supports efforts to assist residents implement cleaner energy efficiency measures, such as programs aimed at assisting residents transition to solar energy and electric appliances, particularly in low-income residences where this transition is most difficult due to high up-front costs and high energy costs in the San Joaquin Valley. For example, the District’s Burn Cleaner Program provides the highest program incentive available for the installation of heat pumps as a replacement alternative for wood burning devices. The District will continue to seek opportunities for working with CARB, CEC,
PUC, cities, counties, other air districts, the building trades, and other partners for transitioning to the cleanest technologies as they continue to become available.