



September 14, 2018

Chair Mary Nichols
California Air Resources Board
1001 I Street
PO Box 2815
Sacramento CA 95812

Dear Chair Nichols,

The signatories to this letter support pragmatic, predictable, and cost-effective measures that allow the California Air Resources Board (CARB) to meet the state's hydrofluorocarbon (HFC) emissions reductions target as defined in California Senate Bill 1383 – a 40 percent reduction in 2030 from 2013 levels. The following measures provide industry with certainty and sufficient time to comply with the new obligations.

We support policies to limit use of HFCs in air conditioning technologies provided they include the following. CARB should:

- Implement California Senate Bill 1013 limits on HFCs in air conditioning technologies, namely the bans on certain refrigerants in building chillers in 2024.
- Adopt an additional regulation prohibiting refrigerants with a global warming potential (GWP) in excess of 750 in all new air conditioners of all other types and capacities, excluding those covered by SB 1013, starting January 1, 2023. Implement this prohibition based on the date of manufacture, with a sell-through period of six (6) months.
- Allow the distribution of products from California to other states in which they are legal for sale in cases in which California's regulations differ from those of other states.

In addition to supporting the policies above, we also:

- Support robust enforcement and strong disincentives for non-compliance for HFC measures.

- Commit to work to complete relevant safety standards, consistent with international standards to the extent practicable, and strongly support their adoption into building codes as quickly as possible.
- Commit to supporting other U.S. states and municipalities wishing to adopt prohibitions on HFCs in all end uses in EPA SNAP Rules 20 and 21, additional measures substantially similar to those developed in California, and the additional stationary air conditioning measures described above.
- Support CARB working with the California Energy Commission (CEC) to encourage proper installation, commissioning, maintenance, and servicing of HVACR systems to reduce refrigerant leaks and maintain energy efficiency, consistent with ACCA QI standards and OEM instructions.

We believe these measures balance environmental benefit with minimizing the cost impact on consumers, all while providing adequate time for manufacturers, distributors, and contractors to prepare for a safe and efficient transition to lower-GWP technologies.

We believe that our recommendations will help continue the tradition of California's leadership in technology and environmental regulations while providing market certainty which will benefit consumers and the industries that serve them.

Respectfully,

Air Conditioning, Heating, and Refrigeration Institute
Natural Resources Defense Council (NRDC)
Carrier Corporation
Daikin Applied Americas, Inc.
Goodman Manufacturing Company, L.P.
Lennox International
Nortek Global HVAC LLC
Trane Inc.
The Chemours Company
Honeywell International Inc.

Cc: Ryan McCarthy
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