

**From:** [REDACTED] <[REDACTED]>  
**Sent:** Wednesday, December 18, 2024 4:27 PM  
**To:** Peter Campbell <[REDACTED]>  
**Subject:** Contact Form

## Contact Form

**Name:** Henry Rogers

**Email:** [REDACTED]

**Phone:** [REDACTED]

### Message:

**Re: Opposition to Proposed Amended Rules 1111 and 1121 Dear Honorable Committee Members:** On behalf of the Harbor Association of Industry & Commerce (HAIC), I am writing to express our opposition to Proposed Amended Rules (PARs) 1111 and 1121, which would set NOx emissions limits at zero for residential and commercial space heating and residential water heating appliances. While HAIC supports efforts to improve air quality and reduce emissions, we have significant concerns about the potential impacts of these proposed amendments on our members and the broader community:

- 1. Cost Burden:** The proposed rules would impose substantial costs on residents and businesses for appliance replacements and electrical upgrades. Many may struggle to afford these changes, particularly in disadvantaged communities.
- 2. Feasibility Concerns:** The timeline for implementation may not allow sufficient time for the market to develop affordable and reliable zero-emission alternatives, potentially leading to supply chain issues and increased costs.
- 3. Grid Reliability:** A rapid shift to all-electric appliances could strain the electrical grid, potentially compromising reliability and resilience.
- 4. Limited Alternatives:** By effectively banning natural gas appliances, the rules may eliminate viable low-emission options, such as ultra-low NOx gas technologies or hydrogen-enriched systems.
- 5. Economic Impact:** The rules could negatively impact businesses in our region, including those involved in natural gas distribution and appliance manufacturing/servicing.
- 6. Inadequate Cost-Effectiveness Analysis:** We believe the cost-effectiveness calculations presented by SCAQMD staff require further scrutiny and transparency. We respectfully request that the Committee consider the following recommendations:

- 1. Extend the implementation timeline to allow for a more gradual transition.**
- 2. Conduct a comprehensive economic impact study, including effects on low-income households and small businesses.**
- 3. Explore a technology-neutral approach that allows for multiple pathways to emissions reduction.**
- 4. Enhance incentive programs to assist with the costs of compliance.**
- 5. Conduct additional public outreach to ensure all affected**

**parties are fully informed. HAIC appreciates the opportunity to provide input on this important matter. We remain committed to working collaboratively with SCAQMD to achieve our shared goals of improved air quality and a thriving regional economy. Thank you for your consideration. Sincerely, Henry Rogers Executive Director Harbor Association of Industry & Commerce**