

Faye Thomas

From: [REDACTED]
Sent: Friday, February 7, 2025 11:12 AM
To: COB
Cc: [REDACTED]
Subject: [EXTERNAL] Misinformation provided by Governing Board Member

Date: 2-7-25
To: Clerk of the Board, AQMD
Subject: Misinformation provided by Governing Board member

Dear AQMD Governing Board:

I just provided a public comment opposing Rules 111 and 1121 for its devastating effects on residents as well as schools, teachers and children at your 2-7-25 meeting. Immediately after my comment (and in the midst of general public comments), Ms. Holly Mitchell stated that she was “irritated” with the “misinformation” in the public comments regarding school districts. She summarily declared that the Rules are “not applicable” to school districts because “Residential” is in the title of each Rule. Ironically, THAT is misinformation.

As you can see below, the term “Residential” does not appear in the title for Rule 1111 and was REMOVED from the Rule 1121 title. Either Mr. Nastri is purposely providing misinformation to the board and to the public, or there have been additional revisions to these Rules without any notice to the public.

In addition, the Rules clearly state that they are applicable to ALL manufacturers, distributors, retailers and installers – so how would school sites ever buy and install anything but electric water heaters and furnaces? It is extremely dishonest to state that school districts “will not be affected.”

Furthermore, the rudeness and unprofessionalism illustrated by Ms. Mitchell, and her dismissiveness of any public concerns of these Rules are exactly why the public has absolutely no trust in the AQMD. Simply espousing subjective views by staff that there will be no negative impact – without any empirical data whatsoever – does not engender public trust.

I implore this board to listen to the public and provide transparency of ALL studies that have been done which show the following impacts. If none have been done, then this Board cannot in good faith vote to approve these Rules. Impacts:

- The financial impact and devastation to residents, businesses, and schools
- The environmental costs of the increased utilization of generators.
- The educational costs to children for learning loss when schools are closed due to electrical blackouts necessitating school closures, and the effect of teacher layoffs due to this huge financial burden.
- The health implications to children and teachers that will result from the use of generators and/or school closures when children will have no access to physical and mental health supports.

Excerpts of the Rules which clearly do NOT have “Residential” in their titles as stated by Ms. Mitchell:

(Adopted December 1, 1978)(Amended July 8, 1983)(Amended November 6, 2009)
(Amended September 5, 2014)(Amended March 2, 2018)(Amended July 6, 2018)
(Amended December 6, 2019)(Amended September 4, 2020)(Amended October 1, 2021)
(Amended September 1, 2023)(Amended [DATE OF RULE ADOPTION])

**PROPOSED AMENDED RULE 1111 **REDUCTION OF NO_x EMISSIONS
FROM NATURAL-GAS-FIRED ~~FAN-~~
~~TYPE-CENTRAL~~ FURNACES****

[RULE INDEX TO BE ADDED AFTER RULE ADOPTION]

(a) Purpose ~~and Applicability~~

The purpose of this rule is to reduce Oxides of Nitrogen (NO_x) emissions from ~~fan-~~
~~type-central~~ natural gas-fired furnaces. ~~Furnaces used for interior space heating, as~~
~~defined in this rule. This rule applies to manufacturers, distributors, sellers, and~~
~~installers of residential and commercial fan-type central furnaces, requiring either~~
~~single phase or three phase electric supply, used for comfort heating with a rated~~
~~heat input capacity of less than 175,000 BTU per hour, or, for combination heating~~
~~and cooling units, a cooling rate of less than 65,000 BTU per hour.~~

(b) Applicability

The provisions of this rule are applicable to manufacturers, distributors, retailers,
Resellers, and Installers of natural gas-fired Furnaces used for interior space heating
with a Rated Heat Input Capacity less than or equal to 2,000,000 British thermal
units (Btu) per hour.

(Adopted December 1, 1978)(Amended March 10, 1995)(Amended December 10, 1999)
(Amended September 3, 2004)(Amended [Date of Rule Adoption])

**PROPOSED AMENDED RULE 1121. ~~CONTROL OF NITROGEN OXIDES-~~
REDUCTION OF NO_x EMISSIONS FROM
~~RESIDENTIAL-TYPE, SMALL~~ NATURAL
GAS-FIRED WATER HEATERS**

[RULE INDEX TO BE ADDED AFTER RULE ADOPTION]

(a) Purpose

The purpose of this rule is to reduce Oxides of Nitrogen (NO_x) emissions from natural gas-fired Water Heaters as defined in this rule.

(~~a~~b) Applicability

~~This~~The provisions of this rule ~~applies~~are applicable to manufacturers, distributors, retailers, Resellers, and ~~installers~~Installers of natural gas-fired ~~water heaters~~Water Heaters, with ~~heat input a~~ Rated Heat Input Capacity ~~rates~~ less than 75,000 British thermal units (Btu) per hour.

Please PUT AN END to Rules 1111 and 1121 to the public, which will CLEARLY negatively impact children and teachers, residents, as well as businesses throughout the region.

Sincerely,

Debra Kamm


Concerned Irvine resident and advocate for children, teachers and school staff