

**BOARD OF DIRECTORS**

**Ed Wytkind, Chair**  
President, EW Strategies LLC

**Carl Kennebrew, Vice-Chair**  
President, IUE-CWA

**Tanya Wallace-Goburn, Vice-Chair**  
Exec. Director, National Black Worker Center

**Robert Puentes, Sec-Treas.**  
President & CEO, Eno Center for Transportation

**Michael Coleman**  
President, Sheet Metal Workers' International  
Association (SMART)

**John A. Costa**  
Intl. President, Amalgamated Transit Union

**Joe DiMichele**  
Director, Professional and Industrial IBEW  
Membership Development

**Scott Douglas**  
Exec. Director, Greater Birmingham Ministries

**Cecilia Estolano**  
CEO and Founder, Estolano Advisors

**Ana Garcia-Ashley**  
Exec. Director, Gamaliel Network

**Jacky Grimshaw**  
Vice President of Government Affairs,  
Center for Neighborhood Technology

**Tamara L. Lee, Esq.**  
Assoc. Professor, Labor Studies & Employment  
Relations, Rutgers University

**Mike Miller.**  
Director, Region 6, United Auto Workers Union

**Greg Regan**  
President, Transportation Trades Department,  
AFL-CIO

**John Samuelsen**  
Intl. President, Transport Workers Union of  
America

**Dr. Beverly Scott**  
Beverly Scott & Associates

**Maria Somma**  
Organizing Director, United Steelworkers

**Christian Sweeney**  
Deputy Organizing Director, AFL-CIO

**Xinge Wang**  
Deputy Director, Transportation Learning Center

**EXECUTIVE DIRECTOR**

Madeline Janis, Esq.

**DEPUTY DIRECTOR**

Miranda Nelson

December 13, 2024

Mr. Krause and Ms. Farr  
South Coast Air Quality Management District (South Coast AQMD)  
21865 Copley Drive  
Diamond Bar, CA 91765

Dear Mr. Krause and Ms. Farr:

On behalf of Jobs to Move America, we write to support the South Coast AQMD's efforts to clean up appliance pollution through amending Rules 1111 and 1121. This proposed regulatory package will achieve significant emissions reductions and spur manufacturers to create a new generation of zero-emission furnaces and water heaters. The effort is also consistent with the 2022 Air Quality Management Plan (AQMP), which determined that "[t]he only way to achieve the required NOx reductions is through extensive use of zero emission technologies across all stationary and mobile sources."<sup>1</sup> Given the serious pollution across the region, these regulatory amendments will bring real health gains and more clean manufacturing jobs by advancing zero-emissions when good "high-road" jobs are desperately needed. Our concern however is the proposal to weaken these rules through delaying compliance deadlines and loopholes. We encourage staff to see these efforts as what they are, a ploy to reduce the efficacy of the rule. It is vital that these rules go to the Governing Board without loopholes or delays and be adopted in February.

There is no need to slow the progress of these rules when we no longer have to choose between creating "high road" jobs and reducing pollution from buildings. The current move to zero-emissions is being embraced by manufacturers as evident in the multiple stakeholder meetings, and the conversation is no longer if, but when our buildings become decarbonized. It is in these conversations that we must continue the call for a better class of jobs in the clean energy transition. Any concerns from the furnace and heater supply chain in meeting these goals should be met with collaboration and creativity, especially when workers are on the front lines, manufacturing, selling, installing and maintaining these new technologies.

We remain pleased to see the South Coast AQMD's Go Zero

<sup>1</sup> South Coast AQMD, 2022 AQMP, at Executive Summary.

program take form. These incentives will be really helpful up-grading buildings' with new zero-emission technologies. It is our understanding that the South Coast AQMD's Executive Officer has committed to a 5-fold increase in the \$21 million allocated to this program. We'd like to see the Board endorse this commitment with a resolution to ensure the over \$100 million will go towards these incentives.

We appreciate AQMD staff's significant work on these proposed amendments to Rules 1111 and 1121 and your consideration of the points made in this letter. Wrapping up this rulemaking process as soon as possible is our hope, and we look forward to working on the important aspects of reducing pollution in our homes and increasing workers protections at our jobs.

Sincerely,

Jasmin Vargas  
CA Senior Organizer,  
Jobs to Move America