



DBA

BIG BEAR SHEET METAL

**COMMERCIAL REFRIGERATION
RESIDENTIAL & COMMERCIAL:
AIR CONDITIONING, HEATING & PLUMBING
SHEET METAL FABRICATION**

Contractor's License # 704953 ♦ EPA Certified Technician

September 1, 2021

Re: Southern California Rule 1111 Exemption

Dear Board Members,

Over the last 2 years there have been multiple meetings with the AQMD regarding Rule 1111 for high altitude applications wherein the AQMD has worked with a few of the HVAC mountain contractors. The purpose of these meetings was to attempt to find a solution for the challenging situations the contractors face in providing service to their customers and, at the same time, trying to meet the strict and impossible guidelines imposed upon them in Rule 1111.

As one of these HVAC mountain contractors, I would like to continue that discussion today. I am asking you to please consider the following problems we will continue to have under Rule 1111 that make it extremely problematic, almost impossible, to provide the services needed to our clients. These mountain residents are directly impacted financially, making it difficult to have a very basic need met...heat!

The AQMD staff is recommending an exemption for downflow heaters, as well as heaters rated at 100,000 BTUs and above. Although this sounds like a generous exemption, it creates even more problems for the mountain contractors and their customers. I'll explain why. Under Rule 1111 a homeowner requiring a downflow heater will end up paying close to \$2,000.00 less for a heater than the neighbor next door who pays for the "same" upflow heater. When the neighbors chat over the fence and discuss their new heaters, they realize there is a significant difference in price for the "same" heater. You can already see accusing fingers pointing at the contractor for "ripping off" the one who was charged more for the "same" product. In a small community like mine, this will negatively affect my business and reputation, which I have spent over 30 years building. This will be the same situation for many other contractors as the word gets out. This directly affects us, our employees and the community we proudly serve.

This same AQMD staff recommended exemption will also create a financial burden for homeowners who require a heater rated under 100,000 BTUs. These homes are generally modest in size and often the homeowners' incomes are modest as well. Under the exemption, these homeowners will pay substantially more because of the ultra low NOX requirement for these size heaters than those who own much larger homes. In addition to the substantial cost increase of the ultra low NOX heaters, my customers will have to wait months or longer to even get a heater due to the extreme shortage and limited availability of the product due to the COVID-19 fallout and the limited number of manufacturers producing these heaters. In fact, there are a few major manufacturers who have washed their hands regarding ultra low NOX and high-altitude applications. This is going to create an even bigger area of burden for the mountain communities as a whole.

In closing, I would like to thank you for hearing my concerns and taking them into consideration as you make a decision that will affect thousands of homes and families in the mountain communities. I am asking you, the Board, to please exempt the high-altitude areas of Southern California from Rule 1111.

Respectfully,

Mike Marcotte

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