

## Carole Wayman

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**From:** Kory Griggs <kory@indoorweatherhvac.com>  
**Sent:** Monday, August 30, 2021 9:12 PM  
**To:** COB  
**Subject:** Rule 1111 Board submittal

**Follow Up Flag:** Follow up  
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Dear Board Members:

Although the AQMD has made many concessions and have done their best to work with the local mountain contractors, distributors and manufacturers in preparation for the impending Rule 1111 high altitude furnace implementation, I do not believe they have provided a viable solution that serves the high-altitude community appropriately.

As mountain contractors we are looking at the possibility of losing access to a very large percentage of equipment we need to properly serve our clientele in the types of houses that we have in our communities, and in the type of extreme weather that we experience. This scenario is detrimental to all living in the mountain communities.

The manufacturers have assured the AQMD they have produced furnaces that cover the majority of their highest selling furnaces. This statement is most likely true down in the lowlands, but they have not properly taken into account the types of furnaces that are commonly used in our local mountain areas. To clarify, we have commonly had access to seven different manufacturers of forced air heaters; but possibly due to the expense of complying with ultra-low NOX regulations, and the expense of R & D ing equipment at high-altitudes, it appears three equipment manufacturers have given up on attempting to produce a furnace that will reliably operate at high altitudes.

This leaves only four manufacturers for mountain contractors to choose from. Thus, this is nearly a 50% reduction in available product before we even consider the product line that has been certified by the other four manufacturers that *theoretically* have furnaces that operate at high altitudes.

Let me now speak of the four available manufacturers.

One manufacturer has certified two units to operate at high altitude. Both of these furnaces that are offered by this manufacturer are only standard efficiency, and of these, neither exceeds 80K BTU capacity. What this means is neither one of these furnaces could be of any possible use to as much as 70% of my mountain clientele.

Two of the three manufacturers that have certified furnaces at altitude have only some facsimile of a product line that can serve roughly 50% percent of my clientele in the local Lake Arrowhead area due to lack of down-flow configurations and low BTU outputs.

The final manufacturer of the four have told the AQMD they have certified equipment, but as of this moment, none of the distributors have seen the high altitude certified equipment, nor do they have any parts, literature, or conversion kits needed for us to even get remotely familiar with what we are required to do to properly install this equipment at altitude.

Furthermore, as of this moment, there is a massive shortage of ultra- low NOX furnaces due to Covid-19 issues leaving us mountain contractors limited availability to a product line that can support our mountain clientele as the winter sets in.

The AQMD staff, knowing the limited availability of the product line, will have made two possible exemptions to Rule 1111 for you to consider. One of these exemptions will be the exemption of down-flow furnaces. I believe it is very abnormal to be presented with any furnace product line that has no equipment capable of being configured into down-flow operation. I've been informed by my fellow mountain contractors operating in the Big Bear area that possibly as many as 60% of all furnaces that they service and install are of down-flow configurations.

The second exemption is the lack of furnaces equal to or above 100K BTUs in the Ultra low NOX lines. Again, it is very abnormal to have a furnace product line that has no high BTU capacities. At least 40% of all furnaces that I work on in the Lake Arrowhead area are of 100K BTUs or greater heating capacities.

Due to the lack of availability of product-- not only due to Covid, but due to manufacturers abandoning our market, due to the lack of any model line that properly serves the mountain areas, and finally, due to the massive exemptions already required to even attempt to serve the high altitude areas, I believe it would be in the best interest of your constituents in the mountain communities if the board would be so gracious as to exempt the high altitude areas of Southern California from Rule 1111.

**Kory Griggs**

Owner

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