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From: Ron deHarte <Ron.deHarte@palmspringsca.gov>
Sent: Tuesday, June 3, 2025 3:47 PM
To: COB
Subject: [EXTERNAL] "Consumer Choice" or Economic Burden? SCAQMD's Latest Rules Miss the Mark for Coachella Valley

As Mayor of Palm Springs and a member of both the Coachella Valley Association of Governments (CVAG) Executive Committee and its Energy & Environmental Resources Committee, I'm deeply concerned by the South Coast Air Quality Management District (SCAQMD)'s proposed Amended Rules 1111 and 1121 to reduce NOx emissions from natural gas furnaces and residential water heaters, respectively. These rules aim to transition towards zero-emission appliances, potentially phasing out natural gas furnaces and water heaters. The new rules propose a pathway for manufacturers to meet increasing compliance targets for zero-NOx emission units, allowing for both zero-emission and conventional natural gas-fired options in the market.

With the new rule concept, consumers will be able to choose either zero-emission appliance options or pay more for conventional natural gas-fired appliances. Sales of NOx-emitting units above specified compliance targets for zero-NOx emission units and NOx-emitting units will be subject to a higher mitigation fee. It's estimated that manufacturers currently supply 20 to 30% residential-type space and water heating units that are already zero-NOx emission units in the South Coast AQMD region. The new rule concept is intended to provide a pathway for more zero-NOx emission options in the market over time.

While SCAQMD attempts to frame this as a victory for "consumer choice," the reality for many Coachella Valley families is far more complex and frankly, disingenuous.

The notion that our residents have a genuine "choice" when faced with potentially higher costs for essential home appliances, all while electric bills continue their upward climb, is a deeply flawed premise. It completely disregards the significant economic disparities that exist within our region. For families already struggling to make ends meet, being "offered" the option to pay more for a zero-emission appliance isn't a choice that enhances their quality of life; it's a financial burden disguised as environmental progress.

SCAQMD's claim of "significant air quality benefits" and "one of the most substantial reductions in the agency's history" also warrants critical scrutiny, particularly concerning its direct relevance to air quality here in Riverside County. Where is the localized research for the Coachella Valley that quantifies the impact of gas stoves and water heaters on our regional air quality? Without specific documentation demonstrating that poor air quality levels in our county are primarily or significantly a result of these appliances, the argument that Coachella Valley residents must bear increased costs for a problem not demonstrably sourced to their immediate environment is unconvincing. This argument feels disconnected from our local reality.

Furthermore, while the "Go Zero NOx pilot incentive program" with its \$21 million allocation is presented as a supportive measure, its scope and accessibility are crucial. This funding simply won't be enough to genuinely offset the increased costs for all economically impacted families. In fact, it's concerning that the ongoing program support will effectively be funded by the most marginalized, and the program will primarily benefit those who are already more financially stable. Without a clear commitment to fully subsidizing the transition for low-income households, particularly in areas like the Coachella Valley where economic vulnerability is high, this incentive program risks becoming little more than a token gesture. A significant flaw in this plan is its failure to address the increased electrical costs families will face, nor the increased demand for electricity on an already overburdened grid.

Ultimately, presenting these new rules as a matter of "choice" completely overlooks the fundamental reality that for many Coachella Valley families, their budget dictates their options, not their preferences. Being forced to pay more for essential home functions without clear, localized evidence of direct benefit to their immediate

air quality, and with potentially inadequate financial assistance, is not an improvement in their quality of life. It is an imposition that could exacerbate existing economic hardships.

"Go Zero" is not a plan for a cleaner environment for all; it's a plan for long-term financial hardship for many of our most vulnerable residents.

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