

**APPENDIX D:**

**RESPONSE TO COMMENTS SENT TO BOARD AND  
COMMITTEE MEMBERS**

**AS OF MARCH 20, 2025 (CLOSE OF COMMENT  
PERIOD)**

## COMMENTS RECEIVED BEFORE MARCH 20, 2025 COMMENT LETTERS

Stakeholders have been submitting letters to the Governing Board and Stationary Source Committee Members since September 2024. This appendix contains those letters listed in the tables below that were received by March 20, 2025, the end of comment period. Staff summarized the general characterizations of the comments and provided responses.

## COMMENT LETTERS SUPPORTING PAR 1111 AND PAR 1121

The following comments supported the original rule concept and maintained support for the new rule concept that sets manufacturer sales targets and mitigation fees. Many of the letters request to strengthen the rule requirements with higher mitigation fees and higher zero-NOx emission sales targets and support and urge no delay on rule adoption. Staff responses to the key points from those comment letters are included in a later section of this appendix.

**Table Appendix D-1 –Support Letters Received before March 20, 2025**

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
1	10/30/2024	Andrea Vidaurre, Charles Miller, David Diaz MPH, Tomas Castro, Lisa Swanson, Christopher Chavez, Christy Zamani, Fernando Gaytan, Jorge Rivera, Charlotte Matthews, Sharon Ungersma, Kim Orbe, Sam Fishman, Stuart Wood PhD,	The People's Collective for Environmental Justice, Los Angeles Climate Reality Project, Active San Gabriel Valley, Climate Action Campaign, Climate Reality Project Orange County Chapter, Coalition for Clean Air,	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-20241030.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-20241030.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
		Ben Stapleton	Day One, Earthjustice, Healing and Justice Center, RMI, San Fernando Valley Climate Reality Project, Sierra Club Los Angeles Chapter, SPUR, Sustainable Claremont, USGBC California)			
2	10/31/2024	Brendan Brown	Green & Healthy Homes Initiative	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-green-and-healthy-homes-initiatives-20241031.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-green-and-healthy-homes-initiatives-20241031.pdf</a>
3	12/18/2024	Christopher Chavez, Charlotte Matthews	Coalition for Clean Air, RMI	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-202412187dd0ecef2b66f27bf6fff00004a91a9.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-202412187dd0ecef2b66f27bf6fff00004a91a9.pdf</a>
4	1/9/2025	Fernando Gaytan, David Diaz, Jane Williams, Robina Suwol, Christopher Chavez, Elizabeth Reid-Wainscoat,	Earthjustice, Active San Gabriel Valley, California Communities Against Toxics,	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-20250109.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-20250109.pdf</a>

Date Received	Commentor Name	Representing	Category	# of Letters	Link
	Ana Gonzalez, David Martinez, Lisa Swanson, Jesse Marquez, Laura Gracia-Santiago, Charles Miller, Eli Lipmen, Hilary Firestone, Christian Tapia-Delgado, Peter M. Warren, Sharon Ungersma, Kimberly Orbe, Anne Pernick, Sam Fishman, Ben Stapleton, Theral Golden	California Safe Schools, Coalition for Clean Air, Center for Biological Diversity, Center for Community Action & Environmental Justice, OC Policy Advocate Climate Action Campaign, Climate Reality Project Orange County Chapter, Coalition For A Safe Environment, Communities for a Better Environment, Los Angeles Climate Reality Project, MoveLA, Natural Resources			

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
			Defense Council, Pacific Environment, San Pedro & Peninsula Homeowners Coalition, San Fernando Valley Climate Reality Project, Sierra Club, SAFE Cities at Stand.earth, SPUR, USGBC California, West Long Beach Association			
5	1/15/2025	John M. Erickson	City of West Hollywood	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-west-hollywood-20250117.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-west-hollywood-20250117.pdf</a>
6	1/30/2025	Gracyna Mohabir	California Environmental Voters	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-environmental-voters-20250130.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-environmental-voters-20250130.pdf</a>
7	1/30/2025	Adrian Martinez	EarthJustice	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-earthjustice-20250130.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-earthjustice-20250130.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
8	2/6/2025	Jorge Rivera	Healing and Justice Center	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-healing-and-justice-center-20250206.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-healing-and-justice-center-20250206.pdf</a>
9	2/6/2025	Chris Chavez	Coalition for Clean Air	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-for-clean-air-20250206.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-for-clean-air-20250206.pdf</a>
10	2/7/2025	Ashley Mercado	Day One	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-day-one-20250207.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-day-one-20250207.pdf</a>
11	2/11/2025	Jane Williams	California Communities Against Toxics	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-communities-against-toxics-20250211.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-communities-against-toxics-20250211.pdf</a>
12	2/13/2025	Shreyas Sudhakar	Vayu	Business	1	<a href="http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-shreyas-sudhakar-20250213.pdf">http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-shreyas-sudhakar-20250213.pdf</a>
13	2/13/2025	Nathan Taft	Stand.earth	Env. Group	1	<a href="http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-stand-earth-20250213.pdf">http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-stand-earth-20250213.pdf</a>
14	2/7/2025	Various	Self	Resident	31	<a href="http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250207.pdf">http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250207.pdf</a>
15	2/11/2025	Isabella Ford	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-isabella-ford-20250211.pdf?sfvrsn=c31f9f61_3">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-isabella-ford-20250211.pdf?sfvrsn=c31f9f61_3</a>
16	2/18/2025	Robina Suwol	California Safe Schools	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-safe-schools-20250218.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-safe-schools-20250218.pdf</a>
17	2/19/2025	Fernando Gaytan, Adrian Martinez	EarthJustice	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-earthjustice-20250219.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-earthjustice-20250219.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
18	2/19/2025	Sherry Lear, Alan Weiner, Jack Eidt, Cheryl Auger, Anita Ghazarian, Bill Sive, Dave Shukla, Chris Peck, Regina Banks, Jennifer Tanner, Ruth Richardson, David J Marrett, Phil Glosserman	350 Southland Legislative Alliance, 350 South Bay Los Angeles, 350 Conejo / San Fernando Valley, SoCal 350 Climate Action, Ban SUP, Indivisible Alta Pasadena, Pink Panthers, Long Beach Alliance for Clean Energy, Urban Ecology Project, Lutheran Office of Public Policy, Indivisible Ca Green Team, Rooted in Resistance (Indivisible), Climate Reality Project Riverside County Chapter, Third	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-20250219.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-coalition-20250219.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
			Act SoCal Chapter			
19	2/14/2025	Various	Self	Resident	755	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250218.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250218.pdf</a>
20	2/19/2025	Elise Kalfayan	Glendale Environmental Coalition	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-glendale-environmental-coalition-20250219.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-glendale-environmental-coalition-20250219.pdf</a>
21	2/20/2025	Charles Miller	Los Angeles Climate Reality Project	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-los-angeles-climate-reality-project-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-los-angeles-climate-reality-project-20250220.pdf</a>
22	2/20/2025	Eli Lipmen	Move LA	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-move-la-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-move-la-20250220.pdf</a>
23	2/20/2025	Maggie Tsai	Asian Pacific Environmental Network	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-apen-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-apen-20250220.pdf</a>
24	2/20/2025	Tori Kjer	Los Angeles Neighborhood Land Trust	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-los-angeles-neighborhood-land-trust-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-los-angeles-neighborhood-land-trust-20250220.pdf</a>
25	2/20/2025	Teto (Hector) Huevo	Jobs to Move America	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-jobs-to-move-america-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-jobs-to-move-america-20250220.pdf</a>
26	2/20/2025	Tony Sirna	Evergreen Action	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-evergreen-action-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-evergreen-action-20250220.pdf</a>



	Date Received	Commentor Name	Representing	Category	# of Letters	Link
27	2/20/2025	David Diaz	ActiveSGV	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-activesgv-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-activesgv-20250220.pdf</a>
28	2/20/2025	Andrew McNamara	Carbon Zero Buildings	Business	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-carbon-zero-buildings-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-carbon-zero-buildings-20250220.pdf</a>
29	2/20/2025	Marven E. Norman	Center for Community Action and Environmental Justice	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-center-for-community-action-and-environmental-justice-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-center-for-community-action-and-environmental-justice-20250220.pdf</a>
30	2/20/2025	Michelle Kim	Shared Streets	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-shared-streets-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-shared-streets-20250220.pdf</a>
31	2/21/2025	Cristhian Tapia-Delgado	Pacific Environment	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-pacific-environment-20250221.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-pacific-environment-20250221.pdf</a>
32	2/20/2025	David Levitus	LA Forward Institute	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-lafi-20250220.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-lafi-20250220.pdf</a>
33	2/19/2025	Various	Self	Resident	307	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250304.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250304.pdf</a>
34	2/28/2025	Alex Arellano	Everybody's Long Beach	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-everybodys-long-beach-20250228.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-everybodys-long-beach-20250228.pdf</a>
35	2/21/2025	Josh Lowenthal	California's 69th Assembly District	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-asm-lowenthal-20250221.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-asm-lowenthal-20250221.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
36	3/6/2025	Stuart Wood	Sustainable Claremont	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sustainable-claremont-20250306.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sustainable-claremont-20250306.pdf</a>
37	2/19/2025	Various	Self	Resident	312	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250307.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250307.pdf</a>
38	2/14/2025	Claire Broome	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-claire-broome-20250214.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-claire-broome-20250214.pdf</a>
39	3/3/2025	Don Weiden	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/don-weiden-support-march-3-2025.pdf?sfvrsn=be6c9f61_2">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/don-weiden-support-march-3-2025.pdf?sfvrsn=be6c9f61_2</a>
40	3/5/2025	Brenden Kalfus	City of Temecula	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-temecula-20250305.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-temecula-20250305.pdf</a>
41	3/13/2025	John M. Erickson (West Hollywood Mayor), Elizabeth Alcantar Loza (Cudahy Mayor), Freddy Puza (Culver City Vice Mayor), Denise Davis (Redlands City Council Member), Jessie Lopaz (Santa Ana Councilwoman), Juan Munoz-Guevara (City of Lynwood)	Elected Officials	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-elected-group-20250313.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-elected-group-20250313.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
		Council Member), Susan Sonne (Buena Park Council Member), Yasmine-Imani McMorrin (Culver City Council Member)				
42	3/18/2025	Pete Marsh	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-pete-marsh-20250318.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-pete-marsh-20250318.pdf</a>
43	3/18/2025	Ciara Morning Star Belardes	Sacred Places Institute for Indigenous Peoples	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sacred-places-institute-20250318.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sacred-places-institute-20250318.pdf</a>
44	3/19/2025	David Martinez	Climate Action Campaign	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-climate-action-campaign-20250319.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-climate-action-campaign-20250319.pdf</a>
45	3/20/2025	Amy Luna Capelle	Women for American Values and Ethics	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-wave-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-wave-20250320.pdf</a>
46	3/20/2025	Tiffany Lwin	Sunrise Movement Orange County	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sunrise-movement-orange-county-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sunrise-movement-orange-county-20250320.pdf</a>
47	3/20/2025	Craig Perkins	The Energy Coalition	Env. Group	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-the-energy-coalition-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-the-energy-coalition-20250320.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
48	3/21/2025	Various	Sierra Club/Self	Env. Group	624	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sierra-club-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sierra-club-20250320.pdf</a>

### COMMENT LETTERS OPPOSING PAR 1111 AND PAR 1121

The comment letters listed in the table below expressed opposition or concerns. The majority of those comments are based on the original rule concept that contained a future effective zero-NOx emission standard that would only allow for the sale of zero-NOx emission space and water heating appliances, e.g., a mandate to transition to zero-NOx appliances. Some comment letters included in the table below have recognized the new rule concept but expressed some concerns on certain provisions. The opposition and concerns on the original rule concept have been addressed by the new rule concept for PAR 1111 and PAR 1121 released on February 7, 2025, which includes zero-NOx emission sales targets for manufacturers and will allow for both zero-NOx emission units and NOx-emitting natural gas-fired units to be sold and installed for use. Staff responses to the key points from the comment letters are included in a later section of this appendix. Comment letter #4 of Table Appendix D-2 is identical to the comment letter included in Appendix C as Comment Letter #37, where a detailed response is provided for each point made in the letter.

**Table Appendix D-2 –Opposition Letters Received before March 20, 2025**

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
1	9/20/2024	Tracy Hernandez	BizFed	Business	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-bizfed-20240920.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-bizfed-20240920.pdf</a>
2	9/20/2024	Stuart Waldman	Valley Industry & Commerce Association	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-valley-industry-commerce-association-20240920.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-valley-industry-commerce-association-20240920.pdf</a>
3	10/3/2024	Fran Inman, David Fleming, Tracy Hernandez, David Englin	BizFed	Business	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/los-angeles-county-business-federation.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/los-angeles-county-business-federation.pdf</a>
4	10/17/2024	Kevin Barker	SoCalGas	Business	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-so-cal-gas-20241017.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-so-cal-gas-20241017.pdf</a>

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						<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-socalgas-20241017.pdf">1121/comment-letter-from-socalgas-20241017.pdf</a>
5	10/17/2024	Whitney Squire	Plumbing Heating Cooling Contractors of California	Business	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-phcc-of-california-20241017.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-phcc-of-california-20241017.pdf</a>
6	10/30/2024	Fran Inman, David Fleming, Tracy Hernandez, David Englin	BizFed	Business	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-bizfed-20241030.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-bizfed-20241030.pdf</a>
7	10/31/2024	Sandi Schulz	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sandi-schulz-20241031.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sandi-schulz-20241031.pdf</a>
8	10/31/2024	Julie Peterson	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-julie-peterson-20241030.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-julie-peterson-20241030.pdf</a>
9	11/3/2024	Marsha Golden	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-marsha-golden-20241103.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-marsha-golden-20241103.pdf</a>
10	11/4/2024	Deborah Knowlton	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-deborah-knowlton-20241104.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-deborah-knowlton-20241104.pdf</a>
11	11/8/2024	Terry Schulz	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-terry-schulz-20241108.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-terry-schulz-20241108.pdf</a>
12	11/29/2024	Lawrence Yoo	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-lawrence-yoo-20241129.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-lawrence-yoo-20241129.pdf</a>

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13	12/18/2024	Hari Dhiman	Eastvale Chamber of Commerce	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-eastvale-chamber-of-commerce-20241218.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-eastvale-chamber-of-commerce-20241218.pdf</a>
14	12/18/2024	Marnie O'Brien Primmer	Orange County Council of Governments	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-occog-20241216.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-occog-20241216.pdf</a>
15	12/18/2024	Tim Hepburn	San Gabriel Valley Council of Governments	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sgvcog-20241218.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sgvcog-20241218.pdf</a>
16	12/18/2024	Mendell L. Thompson	City of Glendora	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-the-city-of-glendora-20241218.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-the-city-of-glendora-20241218.pdf</a>
17	12/30/2024	Various	Self	Resident	86	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20241229.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20241229.pdf</a>
18	12/30/2024	Various	Self	Resident	13	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-various-20241230.pdf">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-various-20241230.pdf</a>
19	12/31/2024	Miguel Prietto	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-miguel-prietto-20241231.pdf">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-miguel-prietto-20241231.pdf</a>

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20	1/1/2025	Various	Self	Resident	7	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250107.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250107.pdf</a>
21	1/9/2025	Various	Self	Resident	4	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250109.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250109.pdf</a>
22	1/17/2025	Katherine Johansen	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-katherine-johansen-20250117.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-katherine-johansen-20250117.pdf</a>
23	1/7/2025	Eunice Ulloa	City of Chino	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-chino-20250107.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-chino-20250107.pdf</a>
24	1/11/2025	Various	Self	Resident	9	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250111.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250111.pdf</a>
25	1/23/2025	Mark Attaway	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-mark-attaway-20250123.pdf">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-mark-attaway-20250123.pdf</a>
26	1/28/2025	Phillip Dupper	City of Loma Linda	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-loma-linda-20250128.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-loma-linda-20250128.pdf</a>
27	1/28/2025	Phillip Dupper, Mayor Popescu, Rigsby, Spencer-Hwang	The City Council of The City of Loma Linda	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-the-city-council-of-the-city-of-loma-linda-20250128.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-the-city-council-of-the-city-of-loma-linda-20250128.pdf</a>

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28	1/28/2025	Scott Voigts	City of Lake Forest	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-lake-forest-20250128.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-lake-forest-20250128.pdf</a>
29	1/24/2025	Various	Self	Resident	16	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250124.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250124.pdf</a>
30	1/30/2025	Blair Stewart	City of Brea	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-brea-20250130.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-brea-20250130.pdf</a>
31	2/1/2025	Various	Self	Resident	8	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-scott-moody-20250201.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-scott-moody-20250201.pdf</a>
32	2/7/2025	Debra Kamm	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-debra-kamm-20250207.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-debra-kamm-20250207.pdf</a>
33	2/7/2025	Various	Self	Resident	68	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250211.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250211.pdf</a>
34	2/14/2025	Greg Newton	City of Norco	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-norco-20250214.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-norco-20250214.pdf</a>
35	2/10/2025	Various	Self	Resident	68	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250214.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250214.pdf</a>
36	2/14/2025	Various	Self	Resident	7	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250115.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250115.pdf</a>



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37	2/19/2025	Mayor Warren, Mayor Pro Tem Garcia, Council Members Cothran, Roberts and Sandoval	City of Fontana	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-fontana-20250219.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-fontana-20250219.pdf</a>
38	2/21/2025	Kris Murray	Association of California Cities Orange County	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-accoc-20250221.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-accoc-20250221.pdf</a>
39	2/24/2025	L. Dennis Michael	City of Rancho Cucamonga	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-rancho-cucamonga-20250224.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-rancho-cucamonga-20250224.pdf</a>
40	2/21/2025	Rose Espinoza	City of La Habra	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-la-habra-20250221.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-la-habra-20250221.pdf</a>
41	2/21/2025	Scott Cutshall	Clay Lacy Aviation	Business	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-clay-lacy-aviation-20250221.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-clay-lacy-aviation-20250221.pdf</a>
42	1/7/2025	Joe Stapleton	City of Newport Beach	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-newport-beach-20250107.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-newport-beach-20250107.pdf</a>
43	2/20/2025	Various	Self	Resident	23	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250306.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-various-20250306.pdf</a>
44	2/17/2025	Sam Wong, MD	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/sam-wong-comment-letter-feb-17-2025.pdf?sfvrsn=b36c9f61_2">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/sam-wong-comment-letter-feb-17-2025.pdf?sfvrsn=b36c9f61_2</a>

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45	3/11/2025	Greg Van Dyke	California Consumer Advocates for Affordability and Safety	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-ca-consumer-advocates-20250311.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-ca-consumer-advocates-20250311.pdf</a>
46	3/18/2025	Sam Wong	Self	Resident	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sam-wong-20250318.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-sam-wong-20250318.pdf</a>
47	3/13/2025	Various	Self	Resident	9331	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letters-from-residents-in-opposition-20250313.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letters-from-residents-in-opposition-20250313.pdf</a>
48	3/12/2025	Bishop Dwight E. Williams	California Senior Alliance	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-senior-alliance-20250312.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-senior-alliance-20250312.pdf</a>
49	3/17/2025	Adam Briones	California Community Builders	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-community-builders-20250317.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-california-community-builders-20250317.pdf</a>
50	3/17/2025	Chip Ahlswede	Apartment Association of Orange County	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-apartment-association-of-orange-county-20250317.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-apartment-association-of-orange-county-20250317.pdf</a>
51	3/18/2025	Robert Sausedo	Community Build, Inc.	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-community-build-inc-20250318.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-community-build-inc-20250318.pdf</a>

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52	3/20/2025	Todd Titus	Heating, Air-Conditioning, & Refrigeration Distributors International (HARDI)	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-hardi-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-hardi-20250320.pdf</a>
53	3/20/2025	Jack Miranda	Jesse Miranda Center for Hispanic Leadership	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-jesse-miranda-center-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-jesse-miranda-center-20250320.pdf</a>
54	3/20/2025	Gretchen Gutierrez	Desert Valleys Builders Association	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-desert-valleys-builders-association-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-desert-valleys-builders-association-20250320.pdf</a>
55	3/20/2025	Laura Halverson, Tim Shaw, Christine Schachter	Tri-Counties of Realtors	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-tri-counties-of-realtors-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-tri-counties-of-realtors-20250320.pdf</a>
56	2/20/2025	Janice Lim	City of Yorba Linda	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-yorba-linda.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-yorba-linda.pdf</a>
57	2/26/2025	Todd Rogers	City of Lakewood	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-lakewood-20250226.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-lakewood-20250226.pdf</a>
58	3/5/2025	Ricky Estrada	City of Menifee	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-menifee-20250305.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-menifee-20250305.pdf</a>
59	3/5/2025	Daniel R. Slater	City of Orange	City/County	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-orange-20250305.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-orange-20250305.pdf</a>

	Date Received	Commentor Name	Representing	Category	# of Letters	Link
						<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-city-of-orange-20250305.pdf">1121/comment-letter-from-city-of-orange-20250305.pdf</a>
60	3/10/2025	Russell Johnson	Associated Builders and Contractors of Southern California	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-associated-builders-and-contractors-of-southern-california-20250310.pdf">https://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/comment-letter-from-associated-builders-and-contractors-of-southern-california-20250310.pdf</a>
61	3/19/2025	Robert Apodaca	The Two Hundred	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-the-two-hundred-20250319.pdf">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-the-two-hundred-20250319.pdf</a>
62	3/20/2025	Laura Halverson, Tim Shaw, Christine Schachter	The Pacific West Association of Realtors	Other	1	<a href="https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-the-pacific-west-association-of-realtors-20250320.pdf">https://www.aqmd.gov/docs/default-source/rule-book/proposed-rules/1111-and-1121/comment-letter-from-the-pacific-west-association-of-realtors-20250320.pdf</a>

**RESPONSE TO KEY TOPICS IN THE COMMENT LETTERS TO THE GOVERNING BOARD AND COMMITTEE MEMBERS***Rule Mandate*

Opposition letters expressed concern over the original rule concept and the mandate to transition to zero-NOx space and water heating appliances at future effective dates when appliances are replaced. Based on the feedback, staff developed a new rule concept for PAR 1111 and PAR 1121 released on February 7, 2025, which includes zero-NOx emission sales targets for manufacturers and will allow for both zero-NOx emission units and NOx-emitting natural gas-fired units to be sold and installed for use. The new rule concept is not a mandate, as consumers can choose which units to install in their homes.

*Consumer Choice*

For discussion on consumer choice, please refer to Response to General Comment 1 in Appendix A.

*Cost and Affordability*

For discussion on cost and affordability, please refer to Response to General Comment 2 in Appendix A.

*Electricity Demand and Grid Sustainability*

For discussion on electric grid sustainability for meeting demand and addressing concerns on power outages, please refer to Response to General Comment 3 in Appendix A.

*Zero-NOx Emission Technology Readiness*

For discussion on zero-NOx emission technology readiness, please refer to Response to General Comment 4 in Appendix A.

*Sufficient Outreach, Public Participation, and Rulemaking Schedule*

For discussion on outreach and rulemaking schedule, please refer to Response to General Comment 5 in Appendix A. Stakeholders can continue to participate in the rulemaking process at future public meetings, including the Public Hearing.

*Cost-Effectiveness Analysis*

For discussion on the cost-effectiveness analysis, please refer to Response to General Comment 6 in Appendix A.

*Emergency Replacements*

For discussion on emergency replacement, please refer to Response to General Comment 7 in Appendix A.

*High-Altitude Concerns*

For discussion on high-altitude installations, please refer to Response to General Comment 8 in Appendix A.

*EPCA*

For discussion on EPCA or concerns on banning natural gas, please refer to Response to General Comment 9 in Appendix A.

*Need for the Rule Amendments*

For discussion on the need for rule amendment, please refer to Response to General Comment 10 in Appendix A. While there may be some co-benefits for indoor air quality, the proposed rule focuses on ambient air quality.

*Benefit of NOx Reduction to Ozone Reduction*

NOx is identified as a criteria pollutant and one of the main precursor pollutants for ozone formation by U.S. EPA. Please refer to Appendix C Response to Comment 11-1 for more regarding the benefit of NOx reductions from PAR 1111 and PAR 1121 on achieving control on ozone formation.

*Incentives to Transition to Zero-NOx Appliances*

For discussion on incentives, please refer to Response to General Comment 11 in Appendix A.

*Labeling and Reporting Requirements*

For discussion on labeling, please refer to Appendix C Response to Comment 27-4.

For discussion on reporting requirements, please refer to Appendix C Response to Comment 27-9.

*Delay January 1, 2027 Compliance Date to 2029*

PAR 1121 Table 2 compliance date for existing buildings has been revised from January 1, 2027, to January 1, 2029. Furthermore, the new rule concept will allow for both zero-NOx emission units and NOx-emitting natural gas-fired units to be sold and installed for use.

*Feasibility of 120V Heat Pump Water Heater*

Please refer to Appendix C Response to Comment PW-9 for a similar comment.

*Technology Check-In for Rule 1146.2*

Staff will conduct a technology check in for Rule 1146.2 and provide update to the Stationary Source Committee prior to the future effective date for the existing building Zero-NOx emission standard.

*Replacement of Units*

PAR 1111 and PAR 1121 do not require the replacement of any operational units. PAR 1111 and PAR 1121 apply at the unit natural turnover when a replacement unit must be installed, often at unit breakdown.

*Existing Mobile Homes*

PAR 1111 and PAR 1121 have been amended to remove the zero-NOx emission standard for space and water heating appliance installations in existing mobile homes. For more discussion on existing mobile homes, please refer to Appendix B Response to Comment 6-1.

*Natural Gas-Fired Stoves, Grills, and Other Cooktops*

Discussion regarding natural gas-fired stoves, grills, and other cooktops are outside of the scope of this rulemaking.

*Costly for Swimming Pool Heaters Going Electric*

Discussion of swimming pool heaters is outside of the scope of this rulemaking. Please refer to South Coast AQMD Rule 1146.2: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1146-2>.

*Motor Vehicles*

Discussion of motor vehicles is outside of the scope of this rulemaking. For more information regarding South Coast AQMD's Old-Vehicle Scrapping Program, please refer to: <https://www.aqmd.gov/home/programs/community/old-vehicle-scrapping>.

*Improving Public Transportation*

Discussion of improving public transportation in South Coast AQMD is outside of the scope of this rulemaking.

*High Electric Bill*

For discussion on consumer choice, please refer to Response to General Comment 1 in Appendix A. For discussion on cost and affordability, including utility cost, please refer to Response to General Comment 2 in Appendix A.

*Tankless Electric Water Heater Electrical Upgrade and Cost*

PAR 1121 is for tank type water heaters, tankless water heaters are outside of the scope of this rulemaking. Please refer to South Coast AQMD Rule 1146.2: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1146-2>.

For discussion on consumer choice, please refer to Response to General Comment 1 in Appendix A. For consumers who choose a zero-NOx unit, an electric panel upgrade is not needed in every case. There are 120v heat pump water heaters available that are plug-in, along with other technologies.

*White Papers and Studies*

Staff appreciates the studies and analyses. For discussion on consumer choice, please refer to Response to General Comment 1 in Appendix A.

*Impact Studies*

Staff appreciates the studies and analyses providing data on existing fossil fuel combustion costs, energy costs, household impacts, health impacts, and technology readiness. Also see General Comment Responses 3 through 5. For discussion on impact assessments, including a socioeconomic impact assessment, estimated number of units, and emission reductions, please refer to Chapter 4.

*Wildfires*

Wildfire emissions are a concern to South Coast AQMD but are outside the scope of PAR 1111 and PAR 1121. The primary concern of wildfires is particulate matter emissions

(PM2.5 and PM10). Rule development for Proposed Rule 444.1 – PM Reductions from Forest Waste for Wildfire Prevention has been initiated. Information for the rulemaking will be posted here: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-404-and-444-1>. South Coast AQMD is supporting ongoing federal, state, and local efforts in response to the recent devastating Los Angeles wildfires. More information on wildfire response can be found here: <https://www.aqmd.gov/2025-wildfire-response>.

#### *Carbon Footprint*

South Coast AQMD is a regional air pollution regulatory agency; the carbon footprint of household natural gas usage is outside of the scope of PAR 1111 and PAR 1121. For discussion on the purpose of PAR 1111 and PAR 1121, please refer to Response to General Comment 10 in Appendix A.

#### *Methane Emissions and Landfills*

CARB regulates methane emissions and adopted numerous methane regulations, including a methane regulation for municipal solid waste landfills. South Coast AQMD also has rules for landfills including Rule 1150 – Excavation of Landfill Sites (<https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1150.pdf>), Rule 1150.1 – Control of Gaseous Emissions from Municipal Solid Waste Landfills (<https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1150-1.pdf>), Rule 1150.3 – Emissions of Oxides of Nitrogen from Combustion Equipment at Landfills (<https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/rule-1150-3.pdf?sfvrsn=10>), and Rule 1118.1 - Control of Emissions from Non-Refinery Flares ([https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/R1118-1.pdf?sfvrsn=d217f161\\_9](https://www.aqmd.gov/docs/default-source/rule-book/reg-xi/R1118-1.pdf?sfvrsn=d217f161_9)).

#### *Lawn Equipment*

CARB regulates lawn, garden, and landscape equipment and has not banned gas powered equipment. South Coast AQMD has an incentive program to exchange gasoline or diesel powered commercial lawn and garden equipment for zero-emission battery electric alternatives. For more information regarding South Coast AQMD’s Lawn and Garden Program, please refer to: <https://www.aqmd.gov/home/programs/community/electric-lawn-and-garden-programs>.

#### *Pilot Program to Verify Feasibility of Zero-NOx Emission Standard*

The comment was based on the original rule concept. The new rule concept for PAR 1111 and PAR 1121 released on February 7, 2025, allows for both zero-NOx emission units and NOx-emitting natural gas-fired units to be sold and installed for use. For discussion on technology readiness, please refer to Response to General Comment 4 in Appendix A. Staff will conduct a technology check-in for rule implementation and provide updates to the Stationary Source Committee.

#### *Implementation Schedule*

PAR 1111 and PAR 121 are applicable to new installations at end of unit life, or at natural turnover, which means 15-25 years of implementation timeline. The new rule concept for PAR 1111 and PAR 1121 released on February 7, 2025, allowing both zero-NOx emission



units and NOx-emitting natural gas-fired units further addresses stakeholder concerns regarding insufficient time to transition to zero-NOx emission appliances.

#### *Financial Burden of Mitigation Fee*

Both rules previously had mitigation fee alternative compliance options. The mitigation fee in the new rule concept strikes a balance while incentivizing zero-NOx emission units. For more on the mitigation fee, please refer to Appendix B Response to Comment PC-6.

#### *Housing Affordability*

The new rule concept for PAR 1111 and PAR 1121 released on February 7, 2025, helps address stakeholder concerns regarding costs and the impacts on housing affordability. For discussion on affordability and cost, please refer to Appendix A Response to General Comment 2. For discussion on rent stabilization and tenant protections, please refer to Chapter 2.

#### *South Coast AQMD Authority*

The South Coast AQMD Governing Board has authority to adopt amendments to Rule 1111 and Rule 1121 pursuant to the Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702, 40725 through 40728, and 41508.

#### *PAR 1111 and PAR 1121 Implementation*

PAR 1111 and PAR 1121 apply to the product supply chain. Manufacturers have the option to comply with PAR 1111 and PAR 1121 by the ZEM alternative compliance option or compliance schedule for new and existing building according to rule paragraph (d)(2). The proposed ZEM alternative compliance option, in lieu of paragraph (d)(2), intends to provide flexibility for the implementation and addresses the concern for consumer choice and costs. The compliance targets by the proposed ZEM alternative compliance option are not hard targets. If consumer demand results in higher sales of NOx-emitting gas units, the manufacturer may supply those units with a higher mitigation fee. Both rules previously had mitigation fee alternative compliance options and manufacturers, distributors, and contractor/installers have gained experience through similar implementation.

#### *Increase Mitigation Fees*

Please refer to Appendix B, Response to Comment - PC-4, Response to Comment 43-1, and Response to Comment 29-2. Fees will be utilized for the Go Zero program. Increasing the fees over time outside CPI, increasing fees for continuously missing targets, eliminating the discount fee, or stricter compliance percentage targets would not be in line with the current efforts to strike a balance while incentivizing zero-NOx emission units.

#### *Lower Mitigation Fees*

For further discussion on fees, please refer to Appendix – B Response to Comment PC-6.

#### *EPCA Preemption*

The new rule concept for Proposed Amended Rules 1111 and 1121 released on February 7, 2025, which includes zero-NOx emission sales targets for manufacturers, will allow for both zero-NOx emission units and NOx-emitting natural gas-fired units to be sold and

installed for use. For discussion on EPCA or concerns on banning natural gas, please refer to Response to General Comment 9 in Appendix A.

#### *Impact on Schools*

The PAR 1111 applicability was revised and no longer includes units with a rated heat input capacity of 175,000 Btu/hr or greater, which would include many furnace sizes for commercial applications such as in schools. The current proposal limits PAR 1111 to furnaces used for indoor heating to less than 175,000 Btu per hour. The rules are not proscriptive, so there may be scenarios where schools choose to install smaller-sized appliance that are subject to PAR 1111 or PAR 1121. The new rule concept for PARs 1111 and 1121 released on February 7, 2025, which includes zero-NO<sub>x</sub> emission sales targets for manufacturers, will allow for both zero-NO<sub>x</sub> emission units and NO<sub>x</sub>-emitting natural gas-fired units to be sold and installed for use. For discussion on consumer choice, please refer to Response to General Comment 1 in Appendix A.

#### *Availability of Solar*

Discussion regarding the availability and cost of solar power is outside the scope of this rulemaking. Please refer to Chapter 2 for discussion on solar technology for heating, ventilation, and air conditioning.

#### *Conflict with the Dormant Commerce Clause*

The new rule concept for Proposed Amended Rules 1111 and 1121 released on February 7, 2025, which includes zero-NO<sub>x</sub> emission sales targets for manufacturers, will allow for both zero-NO<sub>x</sub> emission units and NO<sub>x</sub>-emitting natural gas-fired units to be sold and installed for use. For discussion on consumer choice, please refer to Response to General Comment 1 in Appendix A. For a discussion on the Dormant Commerce Clause please refer to Response to Comment 4-2 in Appendix C.

#### *Attainment of Existing NO<sub>x</sub> Standards*

South Coast Air Basin has been classified as “extreme” nonattainment for the 2015 federal ozone standard. Ozone is formed when NO<sub>x</sub> and VOC react in the presence of sunlight. While both NO<sub>x</sub> and VOC contribute to ozone formation, the key to attaining the ozone standard in the Basin is to reduce NO<sub>x</sub>. For a discussion on the need for the rule amendments, please refer to Response to General Comment 10 in Appendix A.

#### *Accuracy of Health Impacts*

Health benefit from the rules is based on NO<sub>x</sub> emission reductions. Although natural gas combustion is not as emissive as combusting other fossil fuels, the large universe of appliances subject to PAR 1111 and PAR 1121 results in the large emission inventory. PAR 1111 and PAR 1121 will cover over 10 million units emitting an estimated 6.8 tpd NO<sub>x</sub> emissions. Comparatively for NO<sub>x</sub> emission, by 2037, staff estimates all utilities emit 2 to 3 tpd, all refineries emit about 4 tpd, and all passenger vehicles emit about 7 tpd. The health benefit from the rules will be significant. For a detailed discussion on the health benefits analysis, please refer to Response to General Comment 10 in Appendix A.

*Impact on Gas Stoves*

Please note that PARs 1111 and 1121 do not apply to stoves, they apply to space and water heating appliances.

*Readiness of Electrical Appliances*

For a discussion on the readiness of zero-NOx emission technology and consumer choice, please refer to Response to General Comment 4 and Response to General Comment 1, respectively, in Appendix A.

*Impact on Disadvantaged Communities*

PARs 1111 and 1121 apply to residential furnaces and water heaters. The NOx emission reductions as a result of implementation of these two proposed amended rules will benefit the air quality in all communities in which these types of equipment operate. Consumers will have the choice to purchase conventional NOx-emitting units when an appliance needs to be replaced at end of unit life. For consumers who choose to pursue zero-NOx emission units, more incentives and lower utility rate would be available for lower income consumers. For discussion on cost, affordability and incentives, please refer to Response to General Comment 2 and Response to General Comment 11 in Appendix A.

*Impact on Climate Change*

The South Coast AQMD's mission is to improve regional air pollution and to attain state and federal air quality standards. PARs 1111 and 1121 target NOx emission reductions to assist in meeting federal ozone and PM2.5 air quality standards for the region. While there may be co-benefits for greenhouse gas emission reductions via the prevention of natural gas combustion, that is not the direct purview of the South Coast AQMD or the purpose for the proposed rule amendments.

*Sales Targets*

For comments on assessment of sales targets and potential revisions, please refer to Appendix B - Response to Comment PC-3.

*Consistency in Appliance Regulations Across Air Districts*

The South Coast AQMD evaluates the air quality impacts of pollution within its geographical jurisdiction. Similar evaluations of other Air Districts within California may determine the necessity of regulations that also reduce NOx emissions from residential furnaces and water heaters and result in air quality benefits. South Coast AQMD has been in communication with CARB, which is considering statewide rulemaking for space and water heating.

*Go Zero Program Prioritization of Disadvantaged Communities*

An effort will be made to focus rebates on those in overburdened regions, with 75 percent of rebate funding dedicated to overburdened communities for the pilot phase. Staff will monitor the program performance and ensure the prioritization of overburdened communities for future phases. For more information, please refer to Response to Comment 22-1 in Appendix B.

*Utility-Funded Loan Program for Zero-Emission Equipment Transition*

Staff understand utility companies such as Southern California Edison offer state-administered financing programs that help customers by spreading the cost of qualified installations overtime. In addition to those financing opportunities, South Coast AQMD's Go Zero program will provide a source of funds to incentivize the transition to zero-NOx emission residential furnaces and water heaters. This program will be partially funded by the implementation of mitigation fees for NOx emitting natural gas-fired units sold specified in Proposed Amended Rules 1111 and 1121. For more information, please refer to Appendix A – Response to General Comment 11.

*Electrical Upgrades*

By the new rule concept, consumers will have the choice to purchase conventional NOx-emitting units when an appliance needs to be replaced at end of unit life. For consumers who choose zero-NOx emission units, the project cost examples listed in the Clearinghouse website include electric upgrade costs (<https://www.aqmd.gov/home/rules-compliance/residential-and-commercial-building-appliances>), which is also included in staff analysis of cost-effectiveness under Chapter 2 of the staff report. For more information on the costs, please refer to Appendix A – Response to General Comment 2.

*Applicability Change in PAR 1111*

The PAR 1111 applicability was revised and no longer includes units with a rated heat input capacity of 175,000 Btu/hr or greater, units with rated heat input capacity 175,000 Btu/hr and above will be addressed in a future rule development process. For more information, please refer to Appendix B – Response to PC-16.