From: Gerard Manning <[redacted]>
Sent: Tuesday, April 21, 2026 10:36 AM
To: BAAQMD Rule Development <ruledevelopment@baaqmd.gov>
Subject: Public comment on proposed socioeconomic analysis policy

Dear Air District,

Thank you for the opportunity to comment on the proposed amendment to the District's socio-economic analysis policy. Your ruling Health and Safety Code, quoted in the proposed policy [1] requires you to "perform an assessment of the socioeconomic impacts of the adoption, amendment, or repeal of the rule or regulation". However, the assessments detailed in the document are quite limited, and seem to almost entirely focus on costs rather than benefits and economic rather than social or socioeconomic impacts.

I believe the following aspects should naturally be included in any socioeconomic analysis. I'm giving examples mostly around the gas appliance standards (Rule 9-4/9-6) because I'm most familiar with these, but believe that all these aspects are generalizable.

* **Economic costs of continued pollution**
These are not directly mentioned in the policy outline, though they have been included in prior analyses. Given that all pollution has economic costs, these should be a core part of any policy, and cover predicted lost work days, long-term or permanent work disability, reduced work performance, costs of lost school days (educational progress and indirect costs - parents taking time of work, doctors visits, medication costs etc.), and the economic costs of premature deaths from pollution.

* **Social costs of continued pollution**
These are difficult to quantify, but would include the human and community costs of pollution. The sheer human suffering from chronic illness, loss of work and death should be reported, and not hidden merely for a technical lack of ability to quantify.

* **Climate costs of continued pollution**
These are the economic, social and civilizational future costs of contributing to the global climate crisis. As a very rough starting point, cost-of-carbon calculations, set at $190/ton of CO2e before the Trump administration obliterated the measure, can be used for climate calculations. For instance, with a lifetime emission of ~42 tonnes of CO2e for a typical gas water heater (https://climate-fixes.org/BAAD/Climate.html), this would indicate a climate cost of $7980 per water heater, and a generation of gas water heaters across the Bay Area (~2.2m water heaters) would cost $17 bn. While AB318 blocks the Air District from regulating some CO2 emissions, it does not impeded the district from evaluating the climate cost of regulations. Indeed, this may be the single most important calculation of any air pollution rule, given the unimaginable consequences of continued global warming.

*** Economic benefits of additional regulation**
The proposal talks about economic costs of new regulations, but not economic benefits. For instance, the amended rule 9-6 predicts that 2.2m gas water heaters would be replaced by heat pumps over the next ~15 years. The district calculates that each heat pump will cost an additional $1900-$2900 in labor costs, resulting in increased economic activity within the Bay Area of $4.2-6.4 billion.

The estimated bill savings per household of ~$230/year, from lower gas usage [2] will also increase spending power and local economic activity by $500m/yr, balanced by reduced purchases of natural gas, which is not generated in the Bay Area.

Sincerely,

Gerard Manning

[1] https://www.baaqmd.gov/~/media/dotgov/files/rules/socioeconomic-impact-analysis-policy/20260409_outline_seapolicy-pdf.pdf?rev=
[2] https://svcleanenergy.org/wp-content/uploads/Bill-Impacts-of-Home-Electrification-Feb-2025.pdf