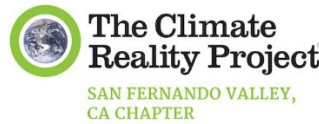




COMMUNITIES FOR A BETTER ENVIRONMENT
established 1978



VIA ELECTRONIC MAIL

December 18, 2024

Chair McCallon and Members of the Stationary Source Committee
South Coast Air Quality Management District
21865 Copley Drive
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Clerk of the Board, clerkofboard@aqmd.gov

**Re: Agenda Item Nos. 1 & 2 - Support for Amendments to Rules 1111 and 1121;
Opposition to Additional Delays in Rule Adoption**

Dear Chair McCallon and members of the Stationary Source Committee:

On behalf of the undersigned, we submit this letter in strong support of the proposed amendments to Rules 1111 and 1121. These amendments are vital to reducing harmful air pollution from residential and commercial appliances in buildings and advancing the goal of achieving zero emissions across sectors. We are disappointed to see additional delays proposed in bringing these amendments to the Governing Board. In the most recent round of comments that ended on December 13, there was overwhelming support for the proposed rules ranging from the **American Lung Association** to **League of Women Voters Los Angeles** to **California Enviro Voters** to **Jobs to Move America**, amongst many others. More than 86% of the comments filed in this most recent comment period supported the rules. We urge you to stay the course and move these Zero-NOx standards to a vote in February for the following key reasons:

- **These Rule Amendments Protect Public Health.** The early gains in reducing ozone pollution over the past three decades have stagnated recently, and our region still fails to meet any federal ozone standards. This year, the South Coast Air Basin missed yet another deadline for ozone levels—set during the Clinton Administration—continuing a disturbing trend of non-compliance. This regulatory package is designed to significantly reduce Nitrogen Oxide (NO_x), a key contributor to ozone pollution, more than any other initiative in over thirty years. In fact, this is the largest emission-reducing regulatory package in over three decades. By eliminating emissions from these appliances over time, we could save billions of dollars in healthcare costs and prevent 76,000 asthma attacks, 30,000 school absences, and 130 premature deaths each year.¹
- **The Rule Amendments are Reasonable.** The Zero-NO_x standards are not new; they are the result of years of work. The Air District incorporated this control measure into its 2022 Air Quality Management Plan (AQMP). The rulemaking process for these proposed amendments took over 14 months and included seven working group meetings, a public workshop, and numerous discussions with stakeholders, including building owners, manufacturers, environmental groups, and energy providers. While we have concerns about a compliance delay to 2029 and the exceptions included in the rule package, we believe that these rules are overdue for the Board’s adoption. Any further delay in rule adoption, even by a few months, is simply unjustified.
- **Delaying Adoption could Lock in Pollution for Decades.** We urge the Committee to reject any further delays in implementation. Already, the current proposal pushes implementation to 2029. Even by a small amount, delaying the implementation of zero-NO_x standards further will have significant long-term consequences for public health and air quality. Furnaces and water heaters typically last 15-20 years. Thus, each delay means another generation of NO_x-emitting appliances will be sold and installed in our region. Five months ago, the Board Chair Delgado declared that the agency would “[r]eview where accelerated reductions could be possible, including through rulemaking to achieve emission reductions on a **more accelerated timeline** than identified in the 2022 AQMP.”² That opportunity is here. We trust that you will deliver on that promise.

The passage of the rule amendments means we can focus on attracting more resources for the region for this transition through the Go Zero program. We urge you to support the Executive Officer's commitment to increase the fund fivefold, guaranteeing that at least \$100 million is allocated towards these incentives.

We appreciate your leadership and commitment to reducing air pollution and stand ready to support the adoption and implementation of these critical amendments.

¹ Coalition for Clean Air and RMI, *Southern California’s Hidden Air Pollution Problem: Gas Furnaces & Water Heaters* (December 2024); <https://www.ccair.org/wp-content/uploads/2024/12/South-Coast-Brief.pdf>

² South Coast Air Quality Management District, Letter of Commitment, July 22, 2024; https://www.aqmd.gov/docs/default-source/clean-air-plans/aqmd-commitment-letter_7-16-24.pdf?sfvrsn=22

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Sincerely,

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David Diaz, Executive Director, **Active San Gabriel Valley**

Jane Williams, Executive Director, **California Communities Against Toxics**

Robina Suwol, Executive Director, **California Safe Schools**

Christopher Chavez, Deputy Policy Director, **Coalition for Clean Air**

Elizabeth Reid-Wainscoat, Urban Wildlands Campaigner, **Center for Biological Diversity**

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