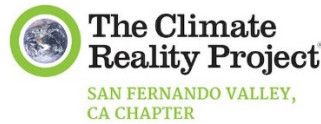




COMMUNITIES FOR A BETTER ENVIRONMENT
established 1978



VIA ELECTRONIC MAIL

January 9, 2025

Chair Vanessa Delgado and Members of the Governing Board
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
Email: vdelgado@aqmd.gov
Clerk of the Board, clerkofboard@aqmd.gov

RE: Agenda Item No. 2 -Amendments to Rules 1111 and 1121

Dear Chair Delgado and Members of the Governing Board:

We write to express our concern regarding another proposed delay in adopting amendments to Rules 1111 and 1121 from February to April. We fear this additional delay will lead to even more delays. While we do not support the delays, we do not oppose as long as this issue is actually brought to the Governing Board in April.

Overall, we support the passage of amendments to Rules 1111 and 1121 that protect our region by setting zero-NOx standards for water heaters and furnaces. This regulatory package is pivotal

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in significantly reducing Nitrogen Oxide (NOx) emissions, a leading cause of ozone pollution, and represents the most substantial pollution reductions for the region in over thirty years. With the region failing to attain even the most basic ozone standards, we cannot afford to leave this important tool on the shelf. Pollution from appliances covered by these rules represents 10 tpd of NOx. For context, in 2026 when the first portions of the rules kick in, this is approximately the amount of pollution from every Light Duty Passenger Automobile in the South Coast Air Basin.

The 2022 Air Quality Management Plan (AQMP) emphasizes the urgent need to deploy zero-emission technologies across all mobile and stationary sources. Yet, even as we enter the third year since the AQMP's passage, these necessary amendments to reduce pollution have not been adopted. Perpetual delays to rule adoption are unjustified and only serve to thwart the agency's mission and perpetuate outdated polluting technology for decades.

The health benefits of the rule amendments also provide a compelling case for action. These rule amendments will prevent 76,000 asthma attacks, 30,000 lost school days, 130 premature deaths, and prevent an estimated \$2 billion in health impacts associated with poor air quality each year.¹

We appreciate your dedication to combating air pollution and look forward to your commitment to swiftly adopting these crucial amendments.

Sincerely,

Fernando Gaytan, Senior Attorney, **Earthjustice**

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**

Ana Gonzalez, Executive Director, **Center for Community Action & Environmental Justice**

David Martinez, **OC Policy Advocate, Climate Action Campaign**

Lisa Swanson, Policy Chair, **Climate Reality Project Orange County Chapter**

Jesse Marquez, Executive Director, **Coalition For A Safe Environment**

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>.

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Laura Gracia-Santiago, Legal Advocate, **Communities for a Better Environment**

Charles Miller, Chapter Chair, **Los Angeles Climate Reality Project**

Eli Lipmen, Executive Director, **MoveLA**

Hilary Firestone, Director, Western Climate & Energy, **Natural Resources Defense Council**

Cristhian Tapia-Delgado, Climate Campaigner, Southern California, **Pacific Environment**

Peter M. Warren, Advocate, **San Pedro & Peninsula Homeowners Coalition**

Sharon Ungersma, Chapter Chair, **San Fernando Valley Climate Reality Project**

Kimberly Orbe, Senior Conservation Program Manager, **Sierra Club**

Anne Pernick, Senior Advisor, SAFE Cities at **Stand.earth**

Sam Fishman, Sustainability and Resilience Policy Manager, **SPUR**

Ben Stapleton, Executive Director, **USGBC California**

Theral Golden, Treasurer, **West Long Beach Association**

Cc: Wayne Nastri, Executive Officer- South Coast Air Quality Management District
Email: WNastri@aqmd.gov

Michael Krause, Assistant Deputy Executive Officer - Planning, Rule Development & Implementation
Email: MKrause@aqmd.gov

Heather Farr, Manager - NOx, SOx, RECLAIM, Rules 3
Email: HFarr@aqmd.gov