



December 11, 2024

Mr. Krause and Ms. Farr
South Coast Air Quality Management District (South Coast AQMD)
21865 Copley Drive
Diamond Bar, CA 91765
Email: mkrause@aqmd.gov; hfarr@aqmd.gov

RE: Support for Proposed Amended Rules 1111 and 1121

Dear Mr. Krause and Ms. Farr:

Coalition for Clean Air writes in support of the South Coast AQMD's efforts to clean up building emissions through amending Rules 1111 and 1121. This proposed regulatory package will achieve more emission reductions than any other effort passed by the district in over three decades. These rules are also key components of the 2022 Air Quality Management Plan (AQMP), which determined that "[t]he only way to achieve the required NO_x reductions is through extensive use of zero emission technologies across all stationary and mobile sources."¹ It is important to note that, as proposed, these amendments are technology-neutral and only create zero-emissions standards for these appliances. These standards would be phased in, starting in 2026 through 2029, and would be prospective – meaning existing units would not need to be proactively decommissioned.

Southern California is home to the smoggiest air in the nation. The tens of millions of breathers in Southern California desperately need these rules and their associated public health benefits. We are deeply concerned, however, that the opponents' tactics of delaying and weakening these proposals are succeeding. The opponents' last-minute demand to delay consideration of these rules is merely a time-tested canard to further sow misinformation and confusion about these rule amendments. While public outreach and transparency are essential parts of the rulemaking process, the opposition are setting an unreasonable standard that is impossible to satisfy.

Without a doubt, the opponents will move the goal posts again, barring a complete capitulation by South Coast AQMD. Already, opponents of this rule are proposing to delay implementation by three years until 2029, which staff is actively considering. We urge both staff and the Governing Board to reject efforts to delay this rule and reduce its efficacy. It is vital that these rules go to the Governing Board in a strong form and be adopted in February. Failure to pass these rules would not only call into question South Coast AQMD's commitment to the AQMP but would also greatly encourage further bad faith tactics from polluters.

¹ South Coast AQMD, 2022 AQMP, at Executive Summary.

With that said, we remain pleased to see the South Coast AQMD's Go Zero program take form. These incentives will be instrumental in hastening the transition away from combustion in our buildings. It is our understanding that the South Coast AQMD's Executive Officer has committed to a 5-fold increase in the \$21 million allocated to this program. It is vital the Board endorse this commitment via resolution to ensure \$100 million goes towards these incentives.

We understand that the rulemaking process is difficult, and we appreciate South Coast AQMD staff's work on the proposed amendments to Rules 1111 and 1121. Yet, public health in Southern California is on the line. South Coast AQMD must implement all feasible measures to meet health-protective air quality standards. Failure to do so would jeopardize public health and invite severe Federal sanctions for our continued violations of the Clean Air Act.

For these reasons, we urge you to keep the proposed amendments to Rule 1111 and 1121 on track for passage in February.

Sincerely,

A handwritten signature in cursive script that reads "Christopher Chavez". The signature is written in black ink and has a fluid, somewhat stylized appearance with a long, sweeping underline.

Chris Chavez
Deputy Policy Director