



February 6, 2025

Chair Delgado and Members of the Governing Board
South Coast Air Quality Management District (South Coast AQMD)
21865 Copley Drive
Diamond Bar, CA 91765

Email: vdelgado@aqmd.gov
Clerk of the Board: cob@aqmd.gov

RE: Strong Support for Proposed Amended Rules 1111 and 1121

Dear Chair Delgado and Members of the Board:

Coalition for Clean Air strongly supports South Coast AQMD's efforts to clean up appliance pollution through amending Rules 1111 and 1121, relating to furnaces and water heaters. Additionally, we support the creation of financial incentive programs to help with the potential costs of transitioning to zero-emission appliances. SCAQMD anticipates the value of these stacked incentive programs to start at \$9,000-14,500, not including any additional incentives from local government and utilities.¹ This proposed regulatory package, coupled with incentives, will achieve more reductions in smog-forming pollutants than any other effort in over three decades. At full implementation, the amendments to Rules 1111 and 1121 will achieve emission reductions of 10 tons per day – 17% of the 2018 South Coast inventory of oxides of Nitrogen (NO_x).²

Coalition for Clean Air works to protect public health, improve air quality and prevent climate change. Our mission is to empower policymakers, businesses, and individuals to make decisions for cleaner air. We aim to reduce air pollution, direct climate investments to benefit the most polluted communities and promote clean air technologies. Not only is Southern California home to the smoggiest air in the nation, but it has long failed to meet national air quality standards. Failure to meet these health-protective standards places millions of Southern Californians at risk for pulmonary and cardiovascular diseases as well as premature death.

The amendments to Rules 1111 and 1121 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.”³ While no single rule will bring the region into attainment of air quality standards, Rules 1111 and 1121 will go a long way in bringing healthy air to Southern California. According to South Coast AQMD's projections, passage of these rules would prevent 4,000 premature deaths and 16,000 new cases of asthma.⁴

¹ South Coast AQMD, Go Zero and Other Incentive Programs

² South Coast AQMD, October 18, 2024 staff presentation to Stationary Source Committee

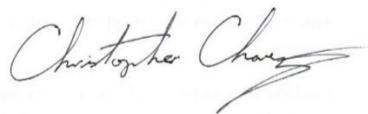
³ South Coast AQMD, 2022 AQMP, at Executive Summary.

⁴ South Coast AQMD, Factsheet on proposed amendments to Rule 1111 and 1121

It is crucial that the Governing Boards adopt these rules in a strong form in May. We are deeply concerned about changes that have weakened the proposed rule amendments, such as delayed compliance deadlines and loopholes. Already, South Coast AQMD has pushed back the implementation of these rule amendments to the end of this decade. Further, any combustion-based HVAC systems or water heaters installed before implementation can continue operating until the appliance's end-of-life. Additionally, the proposed rule amendments include an ever-growing list of exemptions and carve-outs, such as in high altitude areas. The rulemaking process has been far more rigorous than any other recent rule proposal, and the district has gone far beyond what law requires in terms of outreach and scrutiny. Despite these compromises, the opposition has only become more entrenched and aggressive. We urge both staff and the Board to reject efforts to further delay and reduce the efficacy of the rule. Failure to do so only invites further bad faith tactics from regulatory opponents.

We appreciate AQMD staff's significant work on these proposed amendments to Rules 1111 and 1121. Wrapping up this rulemaking process as soon as possible, so we can work on the important aspects of truly transitioning away from combustion in our homes.

Sincerely,

A handwritten signature in cursive script that reads "Christopher Chavez". The signature is written in black ink and is positioned above the typed name and title.

Chris Chavez
Deputy Policy Director

CC: Wayne Nastri, Michael Krause, Heather Farr