

March 6, 2025

South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Proposed Amended Rules 1111 and 1121

Dear SCAQMD Staff,

Thank you for the opportunity to provide further comments on the Proposed Amended Rules (PARs) 1111 and 1121. The Green & Healthy Homes Initiative (GHHI) continues to support the transition to zero-emission appliances as a critical measure to reduce harmful pollutants and improve public health in the South Coast Air Quality Management District.

We appreciate your continued work in developing PARs 1111 and 1121 to reduce NO_x emissions and achieve clean air goals. We also appreciate your thorough public presentations and receptiveness to public comments regarding the latest revisions to the rules.

As stated in our previous comments, we support PARs 1111 and 1121 on the basis that improved air quality will translate into significant health and environmental benefits for residents in the SCAQMD region. NO_x emissions are associated with a range of harmful health impacts for those exposed to elevated concentrations, including aggravation of respiratory diseases that can cause acute medical episodes (such as asthma-related hospitalizations and emergency room visits) for short term exposures and increased risk of the development of asthma and susceptibility to respiratory infections for long term exposures.¹ Studies across the country have found disproportionate exposure among communities of color to NO_x emissions as well as other air pollutants.^{2,3} Studies show consistent associations between higher pollution levels and

¹ Orellano, P., Reynoso, J., Quaranta, N., Bardach, A., & Ciapponi, A. (2020). Short-term exposure to particulate matter (PM₁₀ and PM_{2.5}), nitrogen dioxide (NO₂), and ozone (O₃) and all-cause and cause-specific mortality: Systematic review and meta-analysis. *Environment international*, 142, 105876. <https://doi.org/10.1016/j.envint.2020.105876>;

Huangfu, P., & Atkinson, R. (2020). Long-term exposure to NO₂ and O₃ and all-cause and respiratory mortality: A systematic review and meta-analysis. *Environment international*, 144, 105998. <https://doi.org/10.1016/j.envint.2020.105998>

² Gallagher, C. L., & Holloway, T. (2022). US decarbonization impacts on air quality and environmental justice. *Environmental Research Letters*, 17(11), 114018.

³ Tessum, C. W., Paolella, D. A., Chambliss, S. E., Apte, J. S., Hill, J. D., & Marshall, J. D. (2021). PM_{2.5} pollutants disproportionately and systemically affect people of color in the United States. *Science advances*, 7(18), eabf4491. <https://doi.org/10.1126/sciadv.abf4491>

detrimental respiratory effects in children from exposure to pollutants, including worse lung function for children with asthma.⁴

Within the framework of the revised rules, we believe there are amendments that can help achieve NOx reductions closer to the levels projected in the initial proposal. Specifically, we recommend the following:

1. Determine the Mitigation Fee for Noncompliance based on Health and Social Costs:

- As mentioned in the public consultation, it would be helpful to have more transparency on the methodology for determination of the mitigation fee. We feel that the fee should be directly tied to the health and social costs that marginal NOx emissions impose on the region.
- A more substantial fee for manufacturers who fail to meet sales targets will create a stronger incentive for compliance and accelerate the transition to zero-emission appliances.

2. Accelerate the Ramp-Up of Sales Targets:

- The current phase-in schedule should be accelerated to achieve faster NOx reductions and protect public health more effectively. The revised schedule essentially maintains business-as-usual until 2029. With a more ambitious schedule, SCAQMD can achieve greater air quality and health improvements, and more closely meet the original air quality and climate intent of these proposed rules.
- We believe a timeline of 50% zero emissions technology sales by 2027 and 75% by 2030 would strike a balance between climate and health benefits and the affordability and consumer choice concerns raised during the rulemaking process.

We emphasize that the health of vulnerable populations, particularly children, the elderly, and those with respiratory conditions, depends on swift and decisive action to reduce air pollution. Since frontline communities bear a disproportionate burden of air pollution, they also have the greatest opportunity for health benefits as air pollution is relieved.

We present these recommendations for amendments to PARs 1111 and 1121 in the hopes that the rules may be amended quickly and passed as scheduled in May. By doing so, SCAQMD will not only be achieving critical improvements in air quality, but also improving health outcomes for all residents in the district.

⁴ Belova, A., Dagli, R., Economu, N., Hartley, S., Holder, C., & Hubbard, H. (2022). Literature review on the impacts of residential combustion final report. https://www.lung.org/getmedia/2786f983-d971-43ad-962b-8370c950cbd6/ICF_Impacts-of-Residential-Combustion_FINAL_071022.pdf

Thank you again for your continued efforts to develop effective and equitable appliance rules in the South Coast region.

Sincerely,

Wynn Tucker

Director, Policy & Innovation

Green & Healthy Homes Initiative