



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, clerkofboard@aqmd.gov

February 13, 2025

RE: Strong Support for Proposed Amended Rules 1111 and 1121

Dear Chair Delgado and Members of the Board:

I am with SAFE Cities at Stand.earth, a non-profit organization that works with local government leaders and advocates to pass policies to stop fossil fuel expansion – including policies to limit air and climate pollution from buildings. I have lived almost my whole life in the Air District and my wife and I recently bought a home in Orange County.

SAFE Cities at Stand.earth strongly supports South Coast AQMD’s efforts to clean up appliance pollution through amending Rules 1111 and 1121. Given the serious pollution in this region, and our continued non-attainment of federal air quality standards for ozone, these health gains from advancing zero-emissions are desperately needed for millions of people. The effort is also consistent with the 2022 Air Quality Management Plan (AQMP), which determined that “[t]he only way to achieve the required NOx reductions is through extensive use of zero-emission technologies across all stationary and mobile sources.”¹

SAFE Cities at Stand.earth is deeply concerned that the proposal is getting weakened and now, with the new draft approach, swings too far away from public health and toward allowing ongoing pollution from methane burning in buildings. We believe staff can remedy these concerns with some modest technical fixes that will dramatically increase the emissions benefits. This includes fixing the percentage targets to be more ambitious and making the emission fees tethered to actual emissions.

We urge you to make these remedies, strengthen the rules, and close unnecessary loopholes which will allow the gas industry to keep polluting for the rest of our lifetimes. We also appreciate AQMD staff’s significant work on these proposed amendments to Rules 1111 and 1121. Please complete this rulemaking process, with the necessary remedies, as soon as possible, so we can work on the important aspects of truly transitioning away from combustion in our homes.

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

Sincerely,

Nathan Taft
Senior Campaigner
SAFE Cities at Stand.earth

CC: Wayne Nastri, Michael Krause, Heather Farr