

Comment Letter #17

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Comments and suggestions on the Draft 2022 AQMP:

I understand the region is required to meet the “2015 federal 8-hour ozone standard” by 2037 and that meeting the standard would require reducing emissions of nitrogen oxides (NOx) by 71% more than current rules and regulations will achieve. What the AQMD is allowed to regulate accounts for less than 20 percent of NOx emissions. Everything else is under federal or state control, such as ships, off-road equipment and aircraft. The AQMD can only regulate “stationary sources” of emissions. Residential combustion accounts for only a fraction of a fraction of NOx emissions even though there are gas water heaters, furnaces and stoves in up to 5.3 million residences. I oppose Control measure R-CMB 01, Control measure R-CMB 02, and Control measure R-CMB 03. While ozone may be the cause of health problems in Southern California, banning gas appliances doesn’t fix it. Residential appliances like gas-powered furnaces and water heaters vent pollution outside; the stove is the one gas appliance in a home that is most likely unvented. Even so there are no documented risks to respiratory health from natural gas stoves from the regulatory and advisory agencies and organizations responsible for protecting residential consumer health and safety. The Federal Interagency Committee on Indoor Air Quality (CIAQ) routinely addresses indoor air quality issues of public importance. The CIAQ has not identified natural gas cooking emissions as an important issue concerning asthma or respiratory illness. The association between the presence of a natural gas cooking appliance and increases in asthma in children is not supported by data-driven investigations covering actual appliance usage, emission rates, exposures, and the control of other factors that are well established for contributing to asthma and other respiratory system threats. Claims that children in homes with gas stoves have an increased risk of asthma symptoms frequently reference a “meta-analyses” of literature that emphasizes the simple presence of a gas appliance, not appliance usage or other exposure-related factors. There is no substantive evidence that electric cooking is cleaner when cooking byproducts are considered. Indoor air quality studies have consistently found that emissions from the cooking process—not solely from the burner or heat source operation—represent the chief source of concern with respect to indoor air quality for various classes of pollutants such as particulate matter and volatile organic compounds. Switching to electrical appliances is not a useful strategy to address indoor air quality because the emissions of concern are dominated by the smoke and grease that comes from cooking, regardless of the energy source used in conventional residential appliances. Residential gas cooking appliances represent a minor source of NO2. The principal source of indoor NO2 is polluted outdoor air that migrates indoors from vehicle and other sources.