

December 13th, 2024*Sent via email*

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:

The Center for Biological Diversity supports the South Coast AQMD's efforts to clean up appliance pollution through amending Rules 1111 and 1121. This proposed regulatory package will achieve more emissions reductions than any other effort passed in over three decades. 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 Given the serious pollution in this region, these health gains from advancing zero-emissions are desperately needed for millions of people. We are deeply concerned that the proposal is getting weakened through delaying compliance deadlines and many loopholes. We encourage staff to reject these efforts to reduce the efficacy of the rule. It is vital that these rules go to the Governing Board in a strong form and be adopted in February.

The Center is a non-profit, public interest environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists throughout California and the United States. The Center and its members have worked for many years to protect imperiled plants and wildlife, open space, air and water quality, and overall quality of life in Contra Costa County and the surrounding region.

Air quality is a significant environmental and public health concern in California. Unhealthy, polluted air contributes to and exacerbates many diseases and increases mortality rates. The U.S. government has estimated that between 10 to 12 percent of total health costs can be attributed to air pollution. (VCAPCD 2003.) Greenhouse gases, such as the air pollutant carbon dioxide, which is released by fossil fuel combustion, contribute directly to human-induced climate change (EPA 2016), and in a positive feedback loop, poor air quality that contributes to climate change will in turn worsen the impacts of climate change and attendant air pollution. (BAAQMD 2016.)

Air pollution and its impacts are felt most heavily by young children, the elderly,

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



pregnant women and people with existing heart and lung disease. People living in poverty are also more susceptible to air pollution as they are less able to relocate to less polluted areas, and their homes and places of work are more likely to be located near sources of pollution, such as freeways or ports, as these areas are more affordable. (ALA 2022.) Some of the nation's most polluted counties are in Southern California, and San Bernadino County continually tops the list. (ALA 2022.) According to the American Lung Association's 2022 "State of the Air" report, San Bernadino County is the ninth-worst ranked county in the state for both ozone pollution and year-round particulate matter (PM2.5) pollution, with a "Fail" grade and an average number of 180 days per year with ozone levels in the unhealthy range. (Id.)

We remain pleased to see the South Coast AQMD's Go Zero program take form. These incentives will be really helpful in reducing combustion-related pollution 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 appreciate AQMD staff's significant work on these proposed amendments to Rules 1111 and 1121. Wrapping up this rulemaking process as soon as possible is vital, so we can work on the important aspects of actually transitioning away from combustion in our homes.

Sincerely,

Elizabeth Reid-Wainscoat
Campaigner
Center for Biological Diversity
ereidwainscoat@biologicaldiversity.org