



December 13, 2024

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 Sierra Club Angeles Chapter is writing to voice our strong support of Proposed Amended Rules (PAR) 1111 and 1121 to set a zero-NO_x emission limit on gas-powered furnaces and water heaters. With over 33,000 members in Los Angeles and Orange Counties, one issue that impacts our members regardless of where they live, work, or income is that we are all affected by the poor air quality in the region.

We are seeking your leadership to apply zero-NO_x standards on furnaces and water heaters, which is critical for meeting National Ambient Air Quality Standards (NAAQS) and a way to achieve the required nitrogen oxide (NO_x) reductions identified in the 2022 Air Quality Management Plan (AQMP). Understanding that residential gas-burning equipment alone emits more NO_x pollution than all the region's cement production and power generation combined should add urgency to act and support these rules that over time will target and transition more than 10 million methane-burning furnaces and water heaters.

Our staff, volunteers, and community members have been involved in the process of the proposed amendment of these rules for over a year and we strongly believe that these are reasonable rules. We appreciate staffs engaging working group meetings and discussions where feedback has been provided to ensure a rule works for everyone AND is tackling the poor air quality issue we experience.

These rules are ready. The Go Zero Rebate program is also laying a path forward for stronger success for these rules, including funding for additional outreach, ongoing investments in building and developing the workforce, and funding for rebates ahead of the rules compliance dates. The Go Zero Program will continue to drive the market signal and advance technology, which already exists. Additionally, a technology check-in for June 2027 has been added through the rule-making process which will help share the success of the rules and inform the increased market of technology available in the next few years.



Energy-efficient heat pumps offer solutions that provide additional significant benefits, such as reduced greenhouse gas emissions and increased access to efficient cooling and air filtration during extreme heat and wildfire events, which are intensified and frequent year after year. The staff has consistently reaffirmed that technology to support this transition exists today and that these measures are feasible, even inviting contractors to present during working group meetings. We have seen heat pumps outsell gas furnaces in the United States for the last two years and a 35% year-over-year growth in the heat pump water heater market last year as well.

The proposal to move these equipment categories to zero-NO_x alternatives is key to meeting the goals in the 2022 AQMP. We support 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. 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. Staff has done great work gathering feedback on achievable compliance dates and supporting an equitable transition. The District must stay the course to deliver on the promise of the 2022 AQMP.

Sincerely,

Kim Orbe
Senior Conservation Program Manager
Sierra Club, Angeles Chapter