



VIA ELECTRONIC MAIL

January 30, 2025

Chair Vanessa Delgado and Members of the Governing Board
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
Email: vdelgado@aqmd.gov
Clerk of the Board, clerkofboard@aqmd.gov

RE: Strong Support for Amendments to Rules 1111 and 1121

Dear Chair Delgado and Members of the Governing Board:

For over two years Earthjustice has participated in the working group process for the Amendments to Rules 1111 and 1121. Earthjustice also participated in the 3-year Air Quality Management Plan process that led to the South Coast Air Quality Management District's ("District") commitment to curb appliance pollution through measures that promote zero-emissions.

Throughout this extensive journey, the imperative to curb appliance pollution has only intensified. Pollution from appliances covered by these rules represents 10 tons per day of Nitrogen Oxide (NOx) emissions. For context, emissions from all passenger vehicles in the Air Basin are approximately equal to that number of emissions. We need the Governing Board to tackle these rule amendments given the immense opportunity to bring cleaner air to every corner of the Air Basin.

The 2022 Air Quality Management Plan (AQMP) emphasizes the urgent need to deploy zero-emission technologies across all mobile and stationary sources. And, last summer, you affirmed a commitment to advance emission reductions "through rulemaking to achieve emissions reductions on a more accelerated timeline than identified in the 2022 AQMP".¹ Yet, even as we enter the third year since the AQMP's passage, these necessary amendments to reduce pollution have not been adopted. Perpetual delays to the rule adoption are unjustified and only serve to thwart the agency's mission and perpetuate outdated polluting technology for decades.

¹ Letter from South Coast Air Quality Management District Governing Board Chair to Joseph Goffman, Assistant Administrator Office of Air and Radiation- U.S. Environmental Protection Agency and Liane M. Randolph, Chair- California Air Resources Board, (July 22, 2024); http://www.aqmd.gov/docs/default-source/clean-air-plans/aqmd-commitment-letter_7-16-24.pdf?sfvrsn=22

The health benefits of the rule amendments also provide a compelling case for action. The South Coast AQMD staff estimate these rules will prevent 4,000 premature deaths.² These rule amendments will prevent an estimated \$2 billion in health impacts associated with poor air quality each year.³

We appreciate your dedication to combating air pollution and look forward to your commitment to swiftly adopting these crucial amendments.

Sincerely,



Adrian Martinez
Earthjustice



Fernando Gaytan
Earthjustice

CC: Wayne Nastri, Michael Krause, Heather Farr

² South Coast AQMD, Fact Sheet (December 2024), available at <http://www.aqmd.gov/docs/default-source/rule-book/Proposed-Rules/1111-and-1121/rule-1111-1121-fact-sheet-english.pdf?sfvrsn=6>.

³ Coalition for Clean Air and RMI, Southern California's Hidden Air Pollution Problem: Gas Furnaces & Water Heaters (December 2024), available at <https://www.ccair.org/wp-content/uploads/2024/12/South-Coast-Brief.pdf>.