

June 3, 2025

Chair Vanessa Delgado and Governing Board
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, California 91765

Dear Chair Delgado and Members of the Governing Board:

Thank you for the opportunity to provide comments on the South Coast Air Quality Management District (Air District) staff proposal to amend rules 1111 and 1121 to reduce emissions of nitrogen oxides (NO_x) from small water heaters and furnaces. The California Air Resources Board (CARB) commends the Air District for its leadership in advancing the transition to zero-NO_x emission limits for these applications that will contribute to reducing NO_x emissions to address the extreme nonattainment for ozone standards in the South Coast Air Basin. These rule amendments will also provide significant climate co-benefits, since most zero-NO_x equipment also results in significant reductions of greenhouse gas emissions, which will be critical for helping to achieve California's carbon neutrality goals. Given recent federal actions attacking environmental and public health protections, these rules and related strategies are especially important to continue to protect public health. Additionally, CARB appreciates the Air District staff for its extensive public engagement throughout this rulemaking process.

CARB supports the proposed amendments to these rules and applauds the Air District's efforts to act in an area where there is demonstrated technology ready to deploy at scale with tremendous public health benefits. The Air District's adoption of zero-NO_x emission limits for small water heaters and furnaces will be an essential contribution for meeting air quality standards in the South Coast Air Basin.

CARB looks forward to working with the Air District on the implementation of the rule amendments. Please contact me if you have any questions or wish to discuss further.

Sincerely,

Annalisa Schilla

Annalisa Schilla, Ph.D., Assistant Division Chief
Annalisa.Schilla@arb.ca.gov

cc: (via email) See next page.

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cc: Jennifer Gress, Ph.D., Division Chief, Sustainable Transportation and Communities
Division

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