

4 June 2025

SCAQMD Governing Board  
21865 Copley Drive  
Diamond Bar, CA  
via Email



## **RE: Support for Proposed Amended Rules 1111 and 1121**

Dear Chair Delgado and Members of the South Coast AQMD Governing Board,

It is time to end Southern California's shameful, decades-long distinction as home to the most polluted air in the United States—forcing residents to endure a relentless public health crisis. Climate Action Campaign is in strong support of the proposed amendments to Rules 1111 and 1121, which are essential to begin reducing harmful emissions from residential gas furnaces and water heaters, lowering utility bills, and protecting kids health.

These rules are not about banning appliances or restricting consumer choice. They are about giving families cleaner, healthier options and lowering utility bills. These rules align with public support across the South Coast AQMD region: **large majorities in Los Angeles (75%), San Bernardino (71%), Riverside (68%), and Orange (69%) Counties support a full transition to clean energy by 2050, according to a 2024 poll by [Yale Climate Opinion](#)**. And up to 62% of local residents want their elected officials to do more to address the climate crisis. The public is ready. Now it's time for the Board to lead.

### **Fossil Fuels Are a Dead End for Our Health and Our Wallets**

The transition away from gas is both a public health necessity and an economic imperative. Residential gas appliances are a significant contributor to nitrogen oxide (NOx) emissions, which drive smog formation and are linked to respiratory illness, premature death, and missed work and school days. These rule amendments would avoid hundreds of premature deaths and thousands of new cases of asthma over the next 25 years, with billions of dollars in public health benefits, according to South Coast AQMD's own data.

Economically, the cost of inaction is staggering. **Households that do not electrify may bear a [46% increase in energy bills](#) on average over the next 15 years (relative to current costs)**. For many working families, that's hundreds of extra dollars each year—money that families need for food, rent, and savings.

### **Rules 1111 and 1121 Are Modest but Meaningful Steps**

These rules remain a meaningful move toward the goals set out in the 2022 Air Quality Management Plan. They introduce long-overdue sales targets for zero-emission appliances, establish modest mitigation fees for manufacturers who exceed gas appliance sales caps, and create funding for incentives that help families transition affordably. The rules, as currently

written, still fall short of the AQMP's NOx reduction targets, but they are foundational, and the public cannot afford further erosion.

We support proposals from our environmental justice allies to strengthen the rules through a tiered mitigation fee structure. Manufacturers that repeatedly and substantially miss sales targets should face higher financial responsibility. This aligns with both common sense and existing AQMD policy frameworks. We also echo concerns about the misleading narratives being circulated by fossil fuel interests, narratives that delay climate action, harm public health, and distort the real choices before us.

### **A Clear Principle: Pollution Has a Price**

This vote is about more than furnaces and water heaters. It's about affirming a basic principle: pollution has costs. When families breathe dirty air, they pay for it, with their health, their time, and their income. These rules begin to shift that burden back to those responsible. While the fees are minimal compared to the real costs of pollution, they signal a necessary shift in who bears responsibility for environmental harm.

### **A Moment of Moral and Political Leadership**

This is a pivotal moment. The rules before you represent a compromise, but also a commitment. As the climate crisis intensifies and air pollution continues to disproportionately harm low-income and frontline communities, it is essential that South Coast AQMD deliver on its mission. Approving these rules is not only a vote for cleaner air, it is a vote to honor the voices of the people who have demanded it.

We urge you to adopt the amended rule, strengthen them where possible, reject further weakening amendments, and ensure the Board fulfills its legal and moral obligation to protect public health and deliver on the AQMP's clean air commitments.

Thank you for your leadership and your service.

Sincerely,

David Martinez  
OC Climate Equity Advocate and Organizer  
Climate Action Campaign