



EARTHJUSTICE



**CALIFORNIA
ENVIRONMENTAL
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SIERRA CLUB
ANGELES CHAPTER



**The Climate
Reality Project®**
LOS ANGELES CHAPTER



VIA ELECTRONIC MAIL

June 4, 2025

Chair Delgado and Members of the Board
South Coast Air Quality Management District (South Coast AQMD)
21865 Copley Drive
Diamond Bar, CA 91765
Email: vdelgado@aqmd.gov, cob@aqmd.gov

RE: Agenda Item No. 28 – Supporting the Adoption of Proposed Amended Rules 1111 and 1121

Dear Chair Delgado and Members of the Board:

We write with a sense of resolve, urging you to adopt the proposed amendments to Rules 1111 and 1121 without further delay at the June 6th hearing. These amendments are the culmination of nearly twenty (20) months of rigorous public engagement, extensive working group discussions, and outreach to countless stakeholders. We have seen this process in action and diligently participated in it. Staff made an unprecedented effort to provide the public and the Board with the information needed to make the right decision in adopting these rules, with six presentations to the Stationary Source Committee between October 2024 and May 2025 alone. The resulting framework is a true compromise, balancing the diverse interests involved, yet representing a critical step towards a cleaner future.

These amendments will help shift our region in the right direction by making more zero-NOx water heaters and furnaces available to consumers and helping curb the proliferation of polluting appliances over the next several decades. This is an important step in fulfilling the commitments made in the South Coast Air Quality Management District's 2022 Air Quality Management Plan

which concluded that “[t]he only way to achieve the required NO_x reductions [for the region] is through extensive use of zero-emissions technologies across all stationary and mobile sources.”¹

The stark reality is that furnaces and water heaters remain a substantial contributor to the region’s air pollution woes. In adopting the 2022 AQMP, the Board recognized that zero-NO_x standards for these appliances would be vitally important to ensuring a healthy environment. Even with the concessions made in response to varied stakeholder input, the rules before you today are projected to deliver remarkable public health benefits — an estimated **\$25.43 billion** in health care savings and the **prevention of 2,490 premature deaths** in the region. Moreover, the Final Socioeconomic Impact Assessment for these proposed amendments concludes that their adoption is expected to result in overall cost savings and net jobs gained in the South Coast stemming from new zero-emission appliances in the region. These are benefits we cannot afford to pass on, especially not now.

Now is the critical moment for the Governing Board to uphold its responsibility to deliver clean air benefits to 17 million residents of the South Coast. We need visionary leadership that aligns with California's values of advancing public health and environmental stewardship. In this era of misinformation and deceptive tactics from polluters attempting to derail progress, it’s imperative for our local leaders to stand firm in their commitment to protect our communities.

We call upon each of you to act decisively and pass these rules without further hesitation.

Sincerely,

Fernando Gaytan
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Earthjustice

Christopher Chavez
Deputy Policy Director
Coalition for Clean Air

David Diaz, MPH
Executive Director
Active San Gabriel Valley

Charles Miller
Chapter Chair
LA Climate Reality Project

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Kim Orbe
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David Martinez
OC Climate Equity Advocate and Organizer
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Ben Stapleton
Executive Director
USGBC- CA

¹ South Coast AQMD, 2022 Air Quality Management Plan, at Executive Summary.