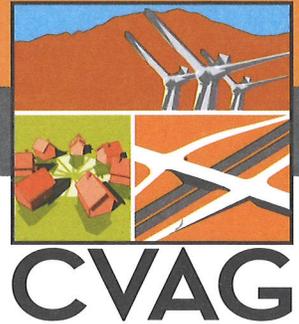


COACHELLA VALLEY ASSOCIATION OF GOVERNMENTS

74-199 El Paseo Drive, Suite 100, Palm Desert, CA 92260 · (760) 346-1127 · www.cvag.org



May 7, 2025

Heather Farr
Planning, Rule Development, and Implementation
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Jen Vinh
Planning, Rule Development, and Implementation
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Dear Ms. Farr and Ms. Vinh,

I want to echo the comments shared in a letter by the Coachella Valley Association of Governments (CVAG) Chair Ted Weill as it pertains to the South Coast Air Quality Management District's (SCAQMD) Proposed Amended Rule 1121, Reduction of NO_x Emissions from Residential-Type, Natural Gas-Fired Water Heaters and Proposed Amended Rule 1111, Reduction of NO_x Emissions from Natural-Gas-Fired Furnaces. At a time when our residents are facing concerns of economic uncertainty, the District's proposal to raise the price on appliances for our low-income residents raises a great concern for our region. Furthermore, we have heard very little scientific reasoning from your organization that explains why the health benefits of this bill are worth the economic impact on our working-class families.

CVAG's Executive Committee, which Chair Weill leads, and its Energy & Sustainability Committee, which I chair, have hosted several meetings where SCAQMD staff provided an overview of the proposed amendments. As your team has seen, we have a number of significant questions about financial and technical feasibility. We worry that low-income households may be financially punished for not being able to afford the more expensive electrical appliances and homeowners could face significantly higher expenses if they need electrical panel upgrades for the additional power load.

It appears that the District has not taken enough time to understand how these Rules would impact the electric system in the IID service territory, home to approximately half of our valley's population. Our additional infrastructure concerns included the lack of additional electrical infrastructure in the region to keep up with economic development and concerns about how effective these policies will be if there is an increase in fossil fuels used to power our grid.

If we understand the District correctly, 80% of NOx emissions are from mobile sources. The Coachella Valley's non-attainment of NOx is attributed to transport from the South Coast Air Basin to the Coachella Valley and the Coachella Valley generates very little NOx locally.

We have made requests for more detailed research and information about the health benefits of these policies so that our committee members can better weigh out the costs vs benefits of these programs.

So far, we have heard no sound air quality or health reasons from your district to justify proposing these rules for the Coachella Valley. Doing so would disproportionately impact disadvantaged households, including our tribal communities. We demand that SCAQMD work hand-in-hand with our community leaders to provide responsible, affordable strategies for improving the air quality and health of our residents.

Please do not hesitate to reach out to Executive Director Tom Kirk at tkirk@cvag.org if need additional information.

Sincerely,



Oscar Ortiz
Councilmember, City of Indio
Chair of CVAG's Energy & Sustainability Committee

CC: Rancho Mirage Mayor Ted Weill, Chair of CVAG

