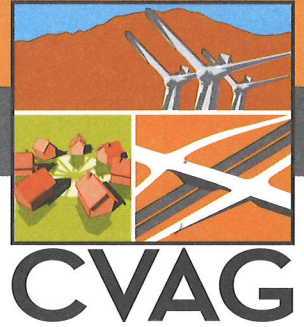


COACHELLA VALLEY ASSOCIATION OF GOVERNMENTS

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May 7, 2025

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

Ms. 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,

The Coachella Valley Association of Governments (CVAG) has been closely following the South Coast Air Quality Management District's (SCAQMD/District) consideration of Rule 1121, Reduction of NOx Emissions from Residential-Type, Natural Gas-Fired Water Heaters and Rule 1111, Reduction of NOx Emissions from Natural-Gas-Fired Furnaces. While we appreciate the informational presentations provided by SCAQMD staff at our meetings, we continue to have grave concerns and deep skepticism about these Rules. At a time when we have been desperately seeking SCAQMD support and guidance on what we see as a real threat to our health and economy, increased PM10 levels since Tropical Storm Hilary, the District's focus on emission reductions from gas fired appliances seems misplaced, at least in the Coachella Valley if not across Southern California.

CVAG is a regional joint powers authority whose boundaries span eastern Riverside County. Our agency is comprised of 10 member cities, four Tribal Nations and the County of Riverside. CVAG has a decades-long track record of working with SCAQMD and other partners on regional air quality issues, as we recognize the impact that it has on public health for our residents and visitors.

SCAQMD staff presented the proposed Rules at three separate meetings held by CVAG's Energy & Sustainability Committee (in February and April 2025) and its Executive Committee (April 2025). While we recognize SCAQMD's efforts to modify the proposed Rules to address concerns, we question their financial and technical feasibility and their applicability in the Coachella Valley.

The Coachella Valley is socioeconomically diverse, and we strongly encourage you to consider how these rule amendments could financially punish low-income, tribal and other households

who may not be able to afford the more expensive electrical appliances as well as homeowners who could face significantly higher expenses if they need electrical panel upgrades for the additional power load. We would also like to receive additional information on the health studies that were used to demonstrate the benefits of switching from gas to electric for these appliances and on pollution levels in the Coachella Valley relative to other parts of the county.

While District staff conveyed that Southern California Edison correspondence asserts that their electric infrastructure could accommodate the demand caused by the new rule, we are served by two electric providers in the Coachella Valley. In the Eastern Coachella Valley, the Imperial Irrigation District (IID) is struggling to accommodate the demands of new growth. Even the smallest development projects have been delayed indefinitely or made financially infeasible due to the strained electric distribution system. This area is also home to many of the region's poorest households. It appears that the District has not taken any steps to understand the Rules' electric system implications in the IID service territory, home to approximately half of our population.

The District has indicated that it must reduce oxides of nitrogen (NOx) to meet Federal Air ozone standards. In the District's slide deck presented to our Executive Committee on April 28, it suggested that the 6.1 tons/day of NOx the proposed rules would reduce by 2037 are similar or greater than NOx emissions from utilities, refineries and all passenger vehicles. Yet in the District's own July 22, 2024 correspondence to the U.S. Environmental Protection Agency (EPA) you state that

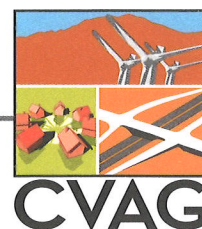
"Today, over 80 percent of NOx emissions within the basin are from mobile sources, and of these, it is the ships, aircraft, interstate trucks, locomotives, and similar heavy-duty engines that are responsible for about three-quarters of these emissions."

Moreover, in the Coachella Valley Attainment Plan for the 2008 8-Hour Ozone Standard dated October 2024, the District states that:

"The [Coachella Valley] region fails to meet federal ozone standards due to the transport of air pollution from the greater Los Angeles area."

"The stations in the [South Coast Air] Basin have more local NOx emissions (mostly from mobile sources) that titrate ozone during nighttime whereas the Coachella Valley has limited local NOx emissions to titrate the ozone at night."

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. So, in addition to the practical questions related to Rule adoption regionally, we ask a very specific question for the Coachella Valley, why are these Rules proposed here? We share our air basin with the Imperial Valley, is the Imperial Valley Air Pollution Control District proposing similar rules? Of course they are not.



There appear to be no sound air quality or health reasons the proposed rules should be proposed for the Coachella Valley. Doing so would disproportionately impact disadvantaged households, tribes and others for no apparent benefit to meet the **Coachella Valley** federal 8-hour ozone standard, or any other air quality standard for our community.

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



Ted Weill
Mayor, City of Rancho Mirage
Chair, CVAG Executive Committee

