

April 17, 2025

South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Revisions to Proposed Amended Rules 1111 and 1121

Dear SCAQMD Staff,

Thank you for the opportunity to offer further comments on the Proposed Amended Rules (PARs) 1111 and 1121. The Green & Healthy Homes Initiative (GHHI) reaffirms its support for the transition to zero-emission appliances as a critical strategy to improve air quality and enhance public health within the South Coast Air Quality Management District.

We appreciate your transparent presentations and openness to public input concerning the latest revisions to the rules. Our previous comments have suggested higher per-unit mitigation fees that more accurately reflect the health costs of NO_x-emitting furnaces and water heaters, as well as a more ambitious sales target schedule that would result in greater emissions reductions and air quality benefits. We continue to support these improvements to the rules and were concerned to see the recent revision of decreasing the non-compliance penalty for water heaters by 50%. To ensure the rules achieve their intended impact, we support a tiered non-compliance penalty structure that would link penalties to the degree of non-compliance.

A tiered non-compliance penalty structure would provide more effective guardrails for PARs 1111 and 1121 to ensure that the zero-emissions sales target will in fact be met by manufacturers, and therefore that the region will in fact be able to achieve air quality goals. We support the tiered non-compliance penalty structure put forward by Earthjustice and other commenters, because it would more effectively provide an incentive for manufacturers to meet sales targets. Tiered non-compliance fees could provide an additional important feedback mechanism by generating additional funds to support low-income customers, thereby helping meet compliance targets in subsequent years.

As the Draft Socioeconomic Impact Assessment shows, the health benefits associated with these rules average \$2.19 billion between 2027 and 2053. Revising the rules to achieve greater emissions reductions will result in even more significant health benefits, preventing additional premature deaths, cases of newly onset asthma, minor restricted activity days, and more. The well-being of vulnerable populations, including children, the elderly, and individuals with respiratory conditions, hinges on effective action to mitigate air pollution. Given that frontline

communities disproportionately bear the burden of air pollution, they also stand to gain the most significant health benefits from its reduction.

Thank you once again for your steadfast commitment to developing effective appliance rules for the South Coast region.

Sincerely,

Wynn Tucker
Director, Policy & Innovation
Green & Healthy Homes Initiative