



**Center for
Progressive
Reform**

December 13, 2024

Mr. Krause and Ms. Farr
South Coast Air Quality Management District (South Coast AQMD)
21865 Copley Drive
Diamond Bar, CA 91765

Re: Support for Proposed Amended Rules 1111 and 1121

Dear Mr. Krause and Ms. Farr:

My name is Catalina Gonzalez. I am a Los Angeles County resident and a Senior Policy Analyst at the Center for Progressive Reform; we are a nonprofit research and advocacy organization guided by a network of legal scholars and staff with expertise in governance and regulation. On behalf of the Center, I am writing to express our support for the South Coast AQMD's efforts to reduce appliance pollution and, in particular, for amending Rule 1111 and 1121. This proposed regulatory package is consistent with the 2022 Air Quality Management Plan (AQMP) and will achieve more emissions reductions than any other effort passed in over three decades.

On a daily basis, a population of approximately 17 million residents in the South Coast Air Basin are exposed to the most polluted air in the nation, with the highest rankings of smog and particulate matter. This pollution disproportionately impacts environmental justice communities who are primarily low-income communities of color and children. Adopting and implementing standards for zero-NOx water heaters and furnaces under Rules 1111 and 1121 is the next critical step that is needed to begin the process of reducing pollution that will bring health and air quality benefits to millions in the South Coast Air Basin.

We are deeply concerned that the proposal is getting weakened due to delays in compliance deadlines and many loopholes. We encourage staff to reject these efforts to reduce the efficacy

of the rule. It is vital that the strongest possible version of these rules go to the Governing Board and be adopted in February.

We believe a combination of policy tools and strategies will be needed to achieve the level of pollution and emission reductions needed to protect public health, and we are pleased to see the South Coast AQMD's Go Zero program take form. In combination with zero-Nox standards, these incentives will be helpful in hastening the transition away from combustion in our buildings. It is our understanding that the South Coast AQMD's Executive Officer has committed to a 5-fold increase in the \$21 million allocated to this program. It is vital that the Board endorse this commitment via resolution to ensure that \$100 million goes towards these incentives.

We appreciate AQMD staff's significant work on these proposed amendments to Rules 1111 and 1121 and urge AQMD to adopt and implement strong rules without delay.

Sincerely,

Catalina Gonzalez
Senior Policy Analyst
Center for Progressive Reform