



October 30, 2024

Chair Vanessa Delgado and Members of the Board  
Governing Board  
South Coast Air Quality Management District (South Coast AQMD)  
21865 Copley Drive  
Diamond Bar, CA 91765

*Submitted via electronic mail to cob@aqmd.gov*

**RE: SUPPORT for Agenda Item 2A: Set Public Hearing on December 6, 2024 for Proposed Amended Rules 1111 and 1121**

Dear Chair Delgado and Members of the Board:

The undersigned organizations respectfully submit the following comments on Proposed Amended Rules (PAR) 1111 and 1121. We strongly support setting PAR 1111 and 1121 for hearing and for the Governing Board’s consideration and adoption at its December meeting.

Many of our organizations have participated in good faith throughout this rulemaking process, and it is good to see the hard work coming to a close. We are eager to see these rules – the largest pollution reduction rule package in over three decades – adopted for healthier air quality and improved public health in the South Coast Air Basin.

### **I. The South Coast Air Basin Needs PAR 1111 and 1121 for Cleaner Air.**

The South Coast Air Basin suffers from among the most polluted air in the nation, with persistently high rankings for ozone (smog) and particulate pollution in the country. This well-documented air quality crisis impacts approximately 17 million residents, a large percentage of which reside in environmental justice communities where the disproportionate burdens of pollution significantly heighten health risks. PAR 1111 and 1121—implementing zero-NOx standards for water heaters and furnaces—is a significant milestone per the direction that culminated from the multi-year adoption process of the 2022 Air Quality Management Plan (AQMP).<sup>1</sup> Upon full implementation, these rules are estimated to reduce NOx emissions by a total of ten (10) tons per day,<sup>2</sup> marking a significant step toward cleaner air and healthier communities. The District must swiftly adopt these rules without further delay.

### **II. The Air Basin is Ready for the Zero-Emission Transition.**

The South Coast Air Basin is well-positioned to transition to zero-emission appliances. Proven technologies are mainstream and readily available: heat pumps, for instance, have outsold gas furnaces in the United States for the past two years,<sup>3</sup> with the heat pump water heater market experiencing 35% year-over-year growth in 2023.<sup>4</sup> In addition to ready-to-deploy options, these point-of-sales regulations are accompanied by essential financial incentives through rebate programs such as the Go Zero Pilot Program, ensuring an equitable transition for low-income households and helping them stay safe as extreme heat and wildfires grow in frequency and intensity. The Go Zero pilot alone offers up to \$21 million in funding, with an overall pool of \$77 million available as the program expands.

---

<sup>1</sup> South Coast Air Quality Management District (SCAQMD). (2022, December 2). 2022 Air Quality Management Plan, [Executive Summary](#).

<sup>2</sup> SCAQMD. September 2024. [Preliminary Draft Staff Report for Proposed Amended Rule 1111 Proposed Amended Rule 1121](#).

<sup>3</sup> D. Reisinger (CNET), “Heat Pumps Outsell Gas Furnaces Once Again: What's the Difference?” February 24, 2024.

<sup>4</sup> EPA, “[ENERGY STAR® Unit Shipment and Market Penetration Report Calendar Year 2023 Summary](#),” 2024.

### **III. Additional Delays are Unnecessary.**

With the region's air quality crisis and substantial funding available for the deployment of zero-emission appliances, now is the time to adopt PAR 1111 and 1121.

Governing Board members should reject requests for further delays. Air District staff has demonstrated commendable diligence through the rulemaking process by undertaking thorough research, multiple site visits, and substantial stakeholder engagement. Staff has based their analyses upon real-world data and lessons learned from current programs, such as TECH Clean California, that are deploying zero-emission appliances today. This is in addition to several changes to rule provisions and compliance options to accommodate industry requests. These rules have been delayed for many months, and there is no more time for further delays. We strongly support this item to set the hearing in December for rule adoption, and strongly urge that no delays occur.

Thank you for considering these comments. We look forward to the adoption of these rule amendments and to getting one step closer to the healthy air the region desperately needs.

Sincerely,

Andrea Vidaurre  
Policy Director  
**The People's Collective for Environmental Justice**

Charles Miller  
Chapter Chair  
**Los Angeles Climate Reality Project**

David Diaz, MPH  
Executive Director  
**Active San Gabriel Valley**

Tomas Castro  
OC Climate Equity Advocate  
**Climate Action Campaign**

Lisa Swanson  
Policy Chair  
**Climate Reality Project Orange County Chapter**

Christopher Chavez  
Deputy Policy Director

**Coalition for Clean Air**

Christy Zamani  
Executive Director

**Day One**

Fernando Gaytan  
Senior Attorney

**Earthjustice**

Jorge Rivera  
Executive Co-Director

**Healing and Justice Center**

Charlotte Matthews, Managing Director  
Jed Holtzman, Senior Associate

**RMI**

Sharon Ungersma  
Chapter Chair

**San Fernando Valley Climate Reality Project**

Kim Orbe  
Senior Conservation Program Manager

**Sierra Club, Angeles Chapter**

Sam Fishman  
Sustainability and Resilience Policy Manager

**SPUR**

Stuart Wood PhD  
Executive Director

**Sustainable Claremont**

Ben Stapleton  
Executive Director

**USGBC California**