

February 28, 2025

Chair Vanessa Delgado and Members of the  
Governing Board  
South Coast Air Quality Management District  
21865 Copley Drive, Diamond Bar, CA 91765  
Via Email: [cob@aqmd.gov](mailto:cob@aqmd.gov)



RE: SUPPORT - Proposed Amended Rules 1111  
and 1121

Dear Chair Delgado and Members of the Governing Board:

Everybody's Long Beach SUPPORTS South Coast AQMD's Proposed Amended Rules 1111 and 1121, which will improve air quality by creating zero-emission appliance standards for residential homes and small businesses.

Everybody's Long Beach's mission is to advocate for affordable and accessible housing across Southern California. We understand the importance of quality housing opportunities, especially for our low-income residents. The climate crisis is directly connected to our land use and planning policy, which is why we're supporting the Proposed Amended Rules 1111 and 1121.

These rules will deliver greater emissions reductions than any rule in over three decades. And they will do so in the most affordable and equitable manner possible: as existing gas appliances reach their end of life, building owners will upgrade them to zero-NOx appliances (primarily, these will be heat pumps and heat pump water heaters, which are mature / on the shelf technology). This end of life replacement approach protects households' previous investments, and leverages significant incentives from the federal government, state, SoCalREN, and utilities.

<https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1111-and-rule-1121>

These rules are the most impactful policies for driving down air pollution from combustion in our existing buildings under consideration in the state. The magnitude of this sector is daunting: we have over 120 million dwelling units in the United States; and about 70 million of them used gas furnaces, 60 million gas water heaters, and 40 million gas stoves. These appliances contribute roughly 10% of US greenhouse gas emissions.

We work with low income households in the City of Long Beach, and are extremely concerned about the financial impacts of any regulation that imposes costs on these households. But we also recognize the severe negative health and economic impacts of fossil-fired air pollution on households and families, and the simple truth that there is no other way to eliminate these sources of pollution except to replace them with cleaner appliances. And we recognize that the availability of incentives has never been higher for this vital task. We acknowledge that a small number of households will see out of pocket cost differences that are greater than the incentives. But the vast majority will be able to use incentives to cover the

difference between a like-for-like replacement and a switch to heat pumps. Therefore, we strongly support the rules and urge the Board to pass them expeditiously.

Given the serious pollution in this region - some of the worst in the country - advancing healthy air standards is desperately needed. These rules will deliver better air quality and lower respiratory diseases for the 18 million residents in the Air Basin. And as a co-benefit, they will boost the state's climate action goals.

These rules will achieve a greater reduction of deadly emissions than any other rule in the last three decades. We appreciate the thorough research and industry engagement your staff have performed to support the advancement of an equitable transition to zero-emission technology aimed at cleaning up the state's worst air pollution. We respectfully ask that you put the state and its residents first by passing these critical healthy air standards

Sincerely,  
Alex Arellano  
Founder and Chapter Leader  
Everybody's Long Beach