



December 12, 2024

Mr. Krause and Ms. Farr
South Coast Air Quality Management District (South Coast AQMD)
21865 Copley Drive
Diamond Bar, CA 91765
Email: mkrause@aqmd.gov; hfarr@aqmd.gov

RE: Support for Proposed Amended Rules 1111 and 1121

Dear Mr. Krause and Ms. Farr:

On behalf of Pacific Environment, I write to support the South Coast AQMD's efforts to clean up appliance pollution through amending Rules 1111 and 1121.

Pacific Environment is a 501(c)(3) public-benefit corporation, headquartered in San Francisco, with regional offices in Anchorage, Alaska, and Chongqing, China. Founded in 1987, Pacific Environment protects people, wildlife, and ecosystems by promoting grassroots activism, strengthening communities, leading strategic campaigns, and reforming international policies. Pacific Environment has earned rare permanent consultative status at the International Maritime Organization (IMO), the United Nations' entity that sets international shipping law. As a member of the Trade, Health, and Equity (T.H.E.) Impact Project, we collaborate with community-based organizations, eNGOs, and environmental lawyers in the South Coast to reduce emissions from polluting freight and logistic operations that threaten the livelihoods of frontline communities.

This proposed regulatory package will achieve more emissions reductions than any other effort passed in over three decades. The effort is also consistent with the 2022 Air Quality Management Plan (AQMP), which determined that “[t]he only way to achieve the required NOx reductions is through extensive use of zero emission technologies across all stationary and mobile sources.”¹ Given the serious pollution in this region, these health gains from advancing zero-emissions are desperately needed for millions of people. We are deeply concerned that the proposal is getting weakened through delaying compliance deadlines and many loopholes. We encourage staff to reject these efforts to reduce the efficacy of the rule. It is vital that these rules go to the Governing Board in a strong form and be adopted in February.

The South Coast air basin has been in nonattainment with federal Clean Air Act standards for over two decades, yet we still lack regulations that will get us there and drive the adoption of zero-emission technologies. Other sectors like the San Pedro Bay Ports remain responsible for over 100 tons of nitrogen oxide (NOx) emissions per day; however, there is hope that we can achieve the necessary reductions. Regulatory measures from the South Coast AQMD, like the amendments to Rules 1111 and 1121 and the Indirect Source Rule (ISR) for Marine Ports promise much needed emission reductions and are within the district's jurisdiction to tackle.

¹ South Coast AQMD, 2022 AQMP, at Executive Summary.



Unfortunately, due to the same repeated objections and unsupported claims from the fossil fuel industry, we have seen delays to these life-saving regulations. We need strong regulations to address these sectors and ensure emission reductions that will get us closer to attainment of federal air quality standards. The South Coast AQMD must stand firm against industry pressure and continue its efforts to enforce regulations that safeguard public health and the environment.

Pacific Environment is pleased to see the South Coast AQMD's Go Zero program take form. 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 the Board endorse this commitment via resolution to ensure \$100 million goes towards these incentives.

We appreciate AQMD staff's significant work on these proposed amendments to Rules 1111 and 1121. Wrapping up this rulemaking process as soon as possible is vital, so we can work on the important aspects of actually transitioning away from combustion in our homes.

Sincerely,

Cristhian Tapia-Delgado
Climate Campaigner, Southern California
Pacific Environment