



February 21, 2025

Chair Delgado, Committee Chair McCallon, and Members of the Governing Board
South Coast Air Quality Management District (South Coast AQMD)
21865 Copley Drive
Diamond Bar, CA 91765
Email: vdelgado@aqmd.gov
lmccallon@aqmd.gov
Clerk of the Board, cob@aqmd.gov

RE: Stationary Source Committee Agenda Item No. 2 – Strong Support for Appliance Rule Amendments to Rules 1111 and 1121

Dear Chair Delgado, Committee Chair McCallon, and Members of the Board:

On behalf of Pacific Environment, I write to express our support for South Coast AQMD's efforts to clean up appliance pollution by creating zero-NOx standards. If done right, amending Rules 1111 and 1121 to achieve zero-NOx for furnaces and water heaters will achieve more emissions reductions than any other effort passed in over three decades.

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.

Getting to zero-NOx for furnace and water heater appliances is 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 The current approach developed by staff addresses the concerns of critics, and their continued discontent makes no sense. We need you to be a strong regulator and recognize the health benefits to our region depend on adopting rules to clean up appliance pollution.

After more than a year of vetting, the staff have developed a proposal that will allow people to buy fossil fuel combusting products if they want. But it will compel the deployment of healthier zero emitting appliances. The staff have struck a compromise that needs to press forward. With that said, there are two ways where the proposal could be strengthened. First, the proposal should increase compliance percentage targets for manufacturers. Second, the mitigation fees should be consistent with emissions impacts.

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



I respectfully request the agency adopt these rules in May, so we can set a market signal and start doing the work of getting the burning of fossil fuels out of our buildings.

Sincerely,

Cristhian Tapia-Delgado
Climate Campaigner, Southern California
Pacific Environment

CC: Wayne Nastri, Michael Krause, Heather Farr