

Communication from Public

Name: Mary Ann Hereford
Date Submitted: 02/13/2025 06:19 PM
Council File No: 25-0063
Comments for Public Posting: Please support the passage of the Proposed Rules 1111 and 1121. As a homeowner and resident of Los Angeles, I was very disheartened to learn of all the ill health effects of Nitrogen Oxide (NOx) that is released while burning fossil fuels. The fossil fuels we use in our homes and businesses release over nine times more NOx and contributes more pollution into our outdoor environment than all our power plants in the region combined. The fossil fuel companies have been misleading the public for decades regarding the negative impacts their products have on our health, especially those in disadvantaged communities. They continue to mislead the public while reaping huge profits. Fossil fuel pollution is also a large contributing factor in our climate crisis which impacts all of us as we all witnessed in the recent wildfires. The climate crisis will only continue to worsen unless we start holding them accountable and also move away from their products. If we continue to delay, another generation of NOx-emitting appliances will be installed in our homes and businesses, locking in another 15-20 years of pollution generating appliances. Please help us move away from fossil fuels and pass the proposed rules 1111 and 1121.

Communication from Public

Name: Fernando Gaytan
Date Submitted: 02/13/2025 03:50 PM
Council File No: 25-0063
Comments for Public Posting: Honorable members of the Committee: I am writing to strongly support Item #2: 25-0063, a resolution backing the South Coast Air Quality Management District's (AQMD) initiative to reduce harmful air pollution by implementing zero-emission standards for common building appliances. Amending Rules 1111 and 1121 to achieve zero nitrogen oxide (NOx) emissions is a crucial step toward improving air quality and, if made strong enough, could catalyze the kind of shift to zero emissions that will deliver the most significant emissions reduction effort we've seen in over thirty years. Achieving zero-NOx standards for furnaces and water heaters aligns with the region's 2022 Air Quality Management Plan, highlighting that extensive use of zero-emission technologies is essential for attaining necessary NOx reductions across all sources. Given the pressing air quality challenges our communities face, advancing these zero-emission measures is critical for protecting the health and well-being of millions of residents. These rule amendments must be presented to the Governing Board in May in a form strong enough to address our regional air pollution struggles. The passage of these regulations is necessary for transitioning our households and businesses away from appliances that contribute to significant health risks. Reducing NOx emissions will help decrease the formation of ozone and PM 2.5, directly benefiting Los Angeles residents who are burdened by air pollution, and aligns with the City's own climate and public health goals. I want to extend my appreciation to the AQMD staff for their dedicated work on these amendments. I urge the committee to wrap up this process swiftly, allowing us to focus on the essential work of moving away from combustion in our homes and promoting cleaner, healthier air for all. Thank you for considering this important resolution. Sincerely, Fernando Gaytan Earthjustice

Communication from Public

Name: Pete Marsh
Date Submitted: 02/13/2025 12:28 PM
Council File No: 25-0063
Comments for Public Posting: SCAQMD Proposed Rules 1111 and 1121: Phasing Out Deadly Appliance Emissions in Homes Executive Briefing: The Rules; Need; Affordability; Health & Equity; Alternatives Proposed Rules This document requests support of two Proposed SCAQMD Rules (1111 and 1121) [1], which will deliver healthier air by eliminating emissions of NOx (and other toxic fumes). The rules help AQMD's ~6M households upgrade from polluting furnaces and water heaters in the most affordable and equitable manner possible: as existing appliances reach end of life, building owners may only replace them with zero-NOx appliances. Why the Rules are Needed The Los Angeles area has the highest levels of ozone in the nation; it is one of only two regions in the US that are in extreme nonattainment of the 2015 US EPA 8-hour ozone standard (70ppb) [2]. The 2022 AQMP concludes that the only way to achieve the required ozone reductions is extensive use of zero emission technologies across all stationary and mobile sources. Heater and water heater emissions cause over \$2 billion per year in health impacts like premature deaths, asthma attacks, lost school days. Heaters and water heaters currently emit seven times more NOx than the region's power plants, and more NOx than regional oil and gas production, refining, cement manufacturing, and power generation combined. These rules would deliver the greatest emissions reductions of any air quality regulation South Coast AQMD has issued in three decades. There is a large co-benefit: eliminating NOx emissions also eliminates greenhouse gas emissions, greatly accelerating Southern California cities' pace of meeting their Climate Action Plan goals, and reducing the need for individual city ordinances and the risk of associated legal action. Affordability Heat pumps outsold gas furnaces for the last two years nationally. Recapitalization cost (up-front) is higher than like-for-like recapitalization with comparable gas furnaces in most cases; but if the heat pump replaces a furnace and air conditioner, recapitalization cost is similar and in some cases lower. Many replacements will require a larger electrical circuit to the appliance location, and a few homes will require main electrical panel upgrades. There are significant federal, state, utility, and SoCalREN incentives that offset most or all of the equipment cost difference and rewiring costs. Health and Equity NOx and fine particulate matter (PM2.5) from methane combustion pose serious risks to human health. NOx leads to respiratory conditions like asthma and reduced lung function in children, and increases the risk of heart disease and early death. PM2.5 exposure is linked to premature death, asthma attacks, and heart and lung problems. Low-income and disadvantaged communities in the South Coast region are most burdened by pollution from gas appliances. Locally, these rules will prevent 4,000 premature deaths, 4,000 emergency room visits, and 16,000 newly onset asthma cases each year. Alternatives Do-Nothing / Business as Usual: Continued non-attainment of NOx standards, smog, and poor health. GHG reduction policies: These have co-benefits of reducing NOx, but are not yet comprehensive statewide. 130 local governments in 5 states have enacted either natural gas bans, all-electric building codes, or Building Performance Standards (BPS) [3]. The fossil industry in 2023 won a lawsuit against Berkeley's gas ban, so BPS are most frequent. Building back from wildfires with resilient, efficient, all-electric buildings and without neighborhood methane distribution pipelines is an excellent opportunity to shift investment where needed and avoid stranded assets [1]: <https://www.aqmd.gov/home/rules-compliance/rules/scaqmd-rule-book/proposed-rules/rule-1111-and-rule-1121> [2]: <https://www.aqmd.gov/home/air-quality/air-quality-management-plans/air-quality-mgt-plan> [3]: <https://buildingdecarb.org/zeb-ordinances>

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Comments for Public Posting: I strongly support Item (2): resolution on supporting the South Coast Air Quality Management District's proposed Rules 1111 and 1121 to mandate zero-emission standards for residential and commercial furnaces and water heaters. For a region that suffers the worst air quality in the nation, rules 1111 and 1121 stood out as a particularly important set of rules. Once implemented, the rule package will reduce up to 10 tons of NOx per day. Adopting the resolution is a clear signal to the AQMD that the rules should be passed without any further delay. We look towards the City Council for leadership through adopting the resolution to help push rules over the finish line. It is a tremendous effort that will protect the health of the 17 million Californians who live, work, and play in the South Coast region.