



March 15, 2023

John J. Bauters, Chair
Bay Area Air Quality Management District
375 Beale Street, Suite 600
San Francisco, CA 94105

Support for Rules 9-4 and 9-6 related to Zero-NO_x Heaters and Water-Heaters

Dear Chair Bauters and Members of the Board:

On behalf of the American Lung Association, I am writing to express our support for the Bay Area Air Quality Management District adopting the proposed zero-NO_x appliance standards to protect lung health. The proposed standards would ensure a reduction in harmful oxides of nitrogen (NO_x) emitted by space and water heaters in support of cleaner air and improved public health across the Bay Area, with a focus on implementation to benefit all communities.

The Bay Area region is home to significant air pollution challenges and major populations at risk due to higher levels of ozone and/or particle pollution. The American Lung Association's "State of the Air" 2022 report found that millions of Bay Area residents experience unhealthy levels of these pollutants.¹ Exposure to unhealthy air can contribute to a wide range of negative health consequences, including asthma attacks, heart attacks and strokes and premature death. Breathing particle pollution can also cause lung cancer. More must be done to address these harms – from all sources – to our most vulnerable residents. The Bay Area is home to over 850,000 children and adults living with asthma, over 400,000 residents living with Chronic Obstructive Pulmonary Disease (COPD), more than half a million living with heart disease and millions of children and seniors more at risk due to unhealthy air. Further, lower-income residents and people of color also face increased risk due to unhealthy air, highlighting the importance of the equitable implementation process laid out in the proposals.

The BAAQMD proposal to require zero-NO_x emissions is a critical tool to address the health harms of unhealthy air in the region and should be adopted without delay. The proposals will result in important reductions in ozone- and particle-forming NO_x emissions throughout the region, with significant public health benefits. Notably, the proposal materials estimate monetized health benefits as high as \$890 million annually which far outweigh estimated compliance costs. The proposed rules represent an important pathway in support of attainment of health-protective clean air standards,² and we support the planned focus on equitable implementation of the rule through the Implementation Working Group process.

The proposed standards will save lives, reduce asthma attacks and other health emergencies each year due to cleaner air. We encourage the Board to approve the proposed rules and ensure that the equity focus included in the proposed implementation process results in meaningful participation, access and positive health outcomes for underserved and highly impacted residents.

¹ American Lung Association. State of the Air 2022. April 2022. www.lung.org/sota

² California Air Resources Board. 2022 State Strategy for the State Implementation Plan. September 2022. https://ww2.arb.ca.gov/sites/default/files/2022-08/2022_State_SIP_Strategy.pdf

The American Lung Association recognizes the importance of moving to zero-emission standards to protect public health and encourages BAAQMD to approve these rules. Please contact me with any questions at William.Barrett@Lung.org. Thank you for considering our comments.

Sincerely,

A handwritten signature in blue ink that reads "Will Barrett". The signature is written in a cursive style with a horizontal line extending from the end.

Will Barrett
Director, Clean Air Advocacy

