

**California Communities Against Toxics**  
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Chair Delgado and Members of the Governing Board  
South Coast Air Quality Management District (South Coast AQMD)  
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Email: [vdelgado@aqmd.gov](mailto:vdelgado@aqmd.gov)  
Clerk of the Board, [clerkofboard@aqmd.gov](mailto:clerkofboard@aqmd.gov)

**RE: Strong Support for Proposed Amended Rules 1111 and 1121**

Dear Chair Delgado and Members of the Board:

California Communities Against Toxics is a network of local environmental justice groups in California that aim to protect communities from industrial pollutants. As such, California Communities Against Toxics is committed to rules that champion a transition away from polluting appliances in the interest of public health and climate change. While our organization is statewide, we were formed after a march protesting the proposal to build a large hazardous waste incinerator in East Los Angeles and our members have worked to reduce air pollution for over 3 decades in the South Coast Air Quality Management District.

It is because of this long history that California Communities Against Toxics strongly supports South Coast AQMD's efforts to clean up appliance pollution by amending Rules 1111 and 1121. This proposed regulatory package will achieve more emissions reductions than any other effort passed by the SCAQMD 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."<sup>1</sup> 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 crucial that these rules go to the Governing Board in the strongest possible form and be adopted in May. The adoption of these rule amendments is necessary to transition households and businesses away from appliances with known health harms. South Coast residents face a significant air pollution burden, and tackling Nitrogen Oxide (NOx) emissions will decrease formation of ozone and PM 2.5. Beginning now to get these significant reductions in NOx emissions will help jumpstart the needed retooling we will need to retrofit homes and buildings and take advantage of existing state and federal incentives supporting these efforts.

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<sup>1</sup> South Coast AQMD, 2022 AQMP, at Executive Summary.

We appreciate AQMD staff's significant work on these proposed amendments to Rules 1111 and 1121. We strongly support finalizing this rulemaking process as soon as possible, so we can work on the important aspects of truly transitioning away from combustion in our homes, schools, and businesses.

Sincerely,

*Jane Williams*

Jane Williams  
Executive Director

CC: Wayne Nastri, Michael Krause, Heather Farr