

CENTER FOR COMMUNITY ACTION AND ENVIRONMENTAL JUSTICE

“Bringing People Together to Improve Our Social and Natural Environment”

February 20, 2025

Chair Delgado, Committee Chair McCallon, and Members of the Governing Board  
South Coast Air Quality Management District (South Coast AQMD)

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**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 the Center for Community Action and Environmental Justice, we are in full support of the South Coast AQMD’s efforts to clean up appliance pollution by creating zero-NOx standards for large sources of pollution. 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. Getting to zero-NOx for these appliances 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> 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 continue to buy products which combust fossil fuels if that is what they would prefer to do. But it will also ensure the continued 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 in earlier years. Second, the mitigation fees should be consistent with emissions impacts.

Please 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,



CCA EJ

Marven E. Norman  
Policy Coordinator

*CCA EJ* is a long-standing community based organization with over 40 years of experience advocating for stronger regulations through strategic campaigns and building a base of community power. Most notably, CCA EJ’s founder Penny Newman won a landmark federal case against Stringfellow Construction which resulted in the ‘Stringfellow Acid Pits’ being declared one of the first Superfund sites in the nation. *CCA EJ* prioritizes community voices as we continue our grassroots efforts to bring lasting environmental justice to the Inland Valley Region.

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