



March 20, 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: Strong Support for Appliance Rule Amendments to Rules 1111 and 1121

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

WAVE - Women for American Values and Ethics supports 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. 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."¹ The current approach developed by staff addresses critics' concerns, 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 has developed a proposal that will allow people to buy fossil fuel-combusting products if they want. However, it will compel the deployment of healthier, zero-emitting appliances. The staff have struck a compromise that needs to be pursued. With that said, there are two ways the proposal could be strengthened. First, it should increase compliance percentage targets for manufacturers. 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,

Amy Luna Capelle
Executive Director
WAVE - Women for American Values and Ethics
amy@wave4all.org

CC: Wayne Nastri, Michael Krause, Heather Farr, Jen Vinh

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