



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 Move LA, we write to support 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.”<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.

Move LA builds broad-based coalitions amongst diverse stakeholders seeking bold solutions to the region’s biggest challenges—i.e., mobility, affordable housing, air quality, homelessness, and climate change. Move LA advocates for the development of a transportation and goods movement system for Los Angeles County that is zero-emission, that includes commercial and industrial buildings. We fight for policies to ensure prosperous and healthy neighborhoods free of pollution where people of all ages and incomes can live, work, and thrive.

After more than a year of vetting, the staff have developed a proposal that will allow people to buy fossil fuel combusting products if they want. But it will compel the 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. Second, the mitigation fees should be consistent with emissions impacts.

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

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,

A handwritten signature in black ink, appearing to read "E. Lipmen". The signature is fluid and cursive, with a large initial "E" and a long, sweeping underline.

Eli Lipmen  
Executive Director  
Move LA  
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CC: Wayne Nastri, Michael Krause, Heather Farr