



March 21, 2025

Stationary Source Committee, South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Proposed Amended Rule 1111 & Amended Rule 1121 - OPPOSE

Dear Members of the Stationary Source Committee,


On behalf of nearly 22,000 indigent residents of Los Angeles we serve at Kheir Clinic, we are writing to express our opposition to the Proposed Amended Rules 1111 and 1121. While we recognize that this legislation is regional in scope, the Proposed Rule Concept and Mitigation Fees will have a disproportionate impact on low-income and underserved communities. The rules appear to heavily favor zero-NOX equipment adoption, which often defaults to electric options, without fully accounting for infrastructure readiness, consumer preference, or the resulting financial burden. Kheir is a 501(c)(3) non-profit service agency, providing critical culturally and linguistically sensitive healthcare and social services to the uninsured and under-insured working poor of Los Angeles.

We believe our patients and residents of Southern California should retain the right to choose from a full range of safe, reliable, and affordable energy sources and appliances for their homes and businesses. We further believe there are more balanced and cost-effective strategies available to improve air quality and protect the environment without creating additional hardships for vulnerable communities.

Southern California faces unprecedented affordability challenges: the costs of housing, transportation, and energy continue to rise. Every day, we care for patients struggling with food insecurity, unemployment, and housing instability—all of which significantly impact their health outcomes and overall safety. It is unreasonable to expect that all households and small businesses will be able to bear the expense of switching to zero-NOX appliances—whether electric or otherwise—without encountering financial strain. For homeowners and landlords, these changes often come with additional costs, such as electric panel and wiring upgrades. For renters, these costs are typically passed on in the form of higher rents. Moreover, households that rely exclusively on electric appliances currently face energy bills averaging over \$1,100 more annually than those using mixed-fuel systems.

Additionally, past events such as the Camp Fire, Kincade Fire, Woolsey Fire, and Eaton Fire have demonstrated vulnerabilities in California's utility infrastructure, including safety lapses linked to electric utilities. Until our regional energy infrastructure can provide safe, comprehensive, and reliable service, it is premature to limit residents to primarily electric or zero-NOX alternatives. The proposed rules erode consumer choice and concentrate risk by eliminating energy diversity. In the event of power outages or service interruptions—whether due to natural disasters or utility failures—residents will face the dangerous prospect of being entirely without energy for critical needs such as cooking, heating, and hot water.

For these reasons, we respectfully oppose the Proposed Amended Rules 1111 and 1121.

Sincerely,

Erin Pak

CC: Supervisor Holly Mitchell, Committee Vice Chair

Kheir Clinic is committed to providing linguistically and culturally sensitive quality primary healthcare and human services support to the underserved and uninsured residents of Southern California.