



March 20, 2025

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

Re: SCAQMD Stationary Source Committee Meeting - Proposed Amended Rules 1111 & 1121

Honorable Chair Delgado and Governing Board Members:

The Tri-Counties of REALTORS® (Tri-Counties) is a local real estate association representing more than 3,000 members and is dedicated to promoting professionalism in real estate, homeownership, private property rights, free enterprise, and responsible government.

We write to express our opposition to Proposed Amended Rule 1111 - Reduction of NOx Emissions from Natural Gas-Fired Furnaces and Proposed Amended Rule 1121 - Reduction of NOx Emissions from Residential-Type, Natural Gas-Fired Water Heaters that do not account for the substantial retrofit and infrastructure upgrade expenses that will result and the increased strain these rules will place on an already aging electrical grid.

These mandated costs would amount to tens of thousands of dollars per homeowner, placing an undue financial burden on Southern California families, many of whom can least afford it and at a time when the dream of homeownership is unattainable for much of our region's workforce. Many residents are already struggling with high living costs - 42% higher than the national average - and mandating costly retrofits and/or replacements will only exacerbate this housing crisis.

The proposed amended rules would impact more than seventeen million people and more than ten million single-family homes, mobile home parks, multi-family residences, office buildings, grocery stores, schools, and other small businesses, and they would collectively impose an expected annual tax of \$306 million on residents and an average of \$1,510 per household.

While we understand and support SCAQMD's efforts to improve air quality, we respectfully urge the Stationary Source Committee and the Governing Board to explore alternative approaches that balance environmental concerns with economic feasibility for all residents.

Sincerely,

Laura Halverson

Executive Vice President

Tim Shaw

Government Affairs Director

Christine Schachter

Government Affairs Director