

March 21, 2025

South Coast AQMD Board Members  
21865 Copley Drive  
Diamond Bar, CA

Subject: Concerns Regarding Proposed Amendments to Rules 1111 & 1121

Dear Governing Board Members,

The Local Government & Small Business Assistance (LGSBA) Advisory Group values AQMD's commitment to improving air quality and protecting public health. Clean air is a shared priority, and we support efforts to reduce emissions in a way that is both practical and sustainable. However, we have significant concerns about the financial burden and lack of outreach associated with the proposed amendments to Rules 1111 and 1121, particularly given today's economic challenges.

### **Financial Burden on Homeowners and Multifamily Units**

The cost of implementing these rules is substantial. Homeowners transitioning from natural gas to zero-NOx appliances could face \$8,000 to \$20,000 in total costs, including the appliance itself, necessary electrical upgrades, rewiring, and potential panel replacements. Multi-family property owners face even greater costs, as retrofitting multiple units could require tens of thousands of dollars in infrastructure upgrades, costs that will inevitably be passed on to renters—worsening housing affordability in an already strained market. Not to mention the challenges and costs to landlord associated with relocating a tenant during construction, which can be a significant disruption to their lives.

### **Impact on Small Businesses**

Small businesses, especially those in HVAC, construction, and equipment distribution, will struggle to comply with these changes. The proposed transition could increase equipment costs, limit consumer choice, and result in job losses, particularly for small, family-owned businesses. Many companies are still recovering from the economic disruptions of recent years and cannot afford such drastic shifts without more financial support and flexibility.

### **Lack of Public Awareness and Outreach**

One of the most concerning aspects of these amendments is the lack of clear and widespread communication to those who will be most affected. Many homeowners, landlords, and small business owners are unaware of the pending regulations, the financial impact, or the steps required for compliance. Major policy changes of this nature should not move forward without extensive public outreach, education, and engagement to ensure that those impacted have a voice in the process.

### **A More Balanced Approach**

We urge AQMD to take a more measured and transparent approach that prioritizes both environmental progress and economic realities by:

- Expanding financial incentives to help offset the high upfront costs for homeowners and multifamily property owners.
- Providing a longer implementation timeline to allow businesses and residents to adapt gradually.
- Enhancing public outreach and education to ensure that all impacted stakeholders are informed and prepared.

While we support efforts to improve air quality, it is essential that these regulations do not place undue financial strain on residents, small businesses, and property owners. We encourage AQMD to reconsider its approach and work towards a solution that protects both public health and economic stability.

Sincerely,

SCAQMD Local Government & Small Business Assistance Advisory Group