



CITY OF MURRIETA

April 16, 2025

Faye Thomas, Clerk of the Boards
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

RE: Comments on Proposed Amended Rules 1111 and 1121

Dear Ms. Thomas and Honorable Members of the Governing Board,

On behalf of the City of Murrieta, I respectfully submit these comments regarding the proposed amendments to South Coast Air Quality Management District (AQMD) Rules 1111 and 1121 currently under consideration by the Board.

While the City of Murrieta fully supports the pursuit of cleaner air outcomes for our region, we have significant concerns about the draft rule changes as proposed. As written, these amendments would substantially limit consumer choice and impose significant financial burdens on local residents and businesses, many of whom are already struggling with rising housing, utility, and living costs.

The affordability of natural gas appliances has long played a key role in ensuring that families have access to reliable and cost-effective energy. The proposed amendments, as currently written, would effectively eliminate this choice through the imposition of zero-NOx emission standards and significant mitigation fees, both of which could make natural gas appliances either legally unavailable or prohibitively expensive.

Furthermore, the alternative compliance pathway outlined in the proposed rules, which imposes restrictive sales caps and financial penalties on manufacturers, will likely result in those additional costs being passed along to consumers. Even in scenarios where federal or state incentives are available, the significant upfront expenses required for the purchase and installation of electric appliance alternatives, combined with the potential need for costly home electrical upgrades, can place these options out of reach for many Murrieta households, especially for seniors and lower-income families.

In addition to these affordability concerns, the proposed shift away from natural gas appliances would place further strain on California's already overburdened electrical grid. The state's current infrastructure is not equipped to handle the significant increase in demand that would result from widespread electrification of home heating and water systems. This raises serious concerns about grid reliability and the potential for more frequent power outages, particularly during peak usage periods or extreme weather events. Simply put, California's electrical grid cannot currently support this proposed regulation without placing the financial and operational burden squarely on our residents, many of whom are already struggling to manage rising costs.

Given these concerns, we echo SoCalGas's recommendation that the South Coast AQMD:

1. Delay consideration and adoption of the proposed amendments until a thorough feasibility study of lower-NOx alternatives, including fuel-neutral pathways, is completed.
2. Hold a public workshop to provide stakeholders with the opportunity to review and discuss cost-effective alternatives that protect both air quality goals and consumer affordability.
3. Reconsider the legal and economic implications of proceeding with rules that effectively limit access to widely used, affordable, and economical appliances.

The City of Murrieta values and appreciates the District's efforts to address air quality challenges and advance environmental protections. However, we believe that these efforts must be balanced against the economic realities facing our communities. An inclusive and collaborative approach will ensure that the resulting regulations are not only environmentally responsible but also economically sustainable and equitable for all Southern Californians.

We appreciate and understand the difficult position you find yourself in, balancing state mandates with community needs. Should you have any questions, do not hesitate to contact Isaac Bravo, Management Analyst, at ibravo@murrietaca.gov or (951) 461-6449.

Sincerely,

A handwritten signature in blue ink that reads "Cindy L. Warren". The signature is fluid and cursive, with the first name "Cindy" and last name "Warren" clearly legible.

Cindy Warren,
Mayor