



CITY OF ANAHEIM  
MAYOR ASHLEIGH E. AITKEN, ESQ.

June 2, 2025

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

**RE: Comments on Proposed Amended Rules 1111 and 1121 - Notice of OPPOSITION**

Dear Chair Delgado and Members of the Board,

On behalf of the City of Anaheim, we are writing to express our concerns regarding the South Coast Air Quality Management District's Proposed Amended Rules (PARS) 1111 and 1121. Our city, like many in the Orange County region, is deeply committed to improving air quality and advancing environmental sustainability. However, we believe these proposed amendments warrant further review to ensure they are economically viable, socially equitable, and practically achievable for all our residents.

PARS 1111 and 1121 could potentially require consumers to switch to more costly all-electric furnaces and water heaters, which would financially impact homeowners, property owners, businesses, and residents. If adopted, these mandates can restrict consumer choice by phasing out reliable and affordable heating and water heating systems in favor of alternatives that may not be readily available or cost-effective for all residents.

Additionally, the proposed changes overlook the significant costs that owners of older homes will face. Beyond the appliance purchase, homeowners, renters, and businesses will need to pay tens of thousands of dollars for retrofits and infrastructure upgrades to support the new technology. Many won't be able to afford these unexpected and substantial expenses. Anaheim residents already face immense financial pressure from the high cost of living. Forcing them to pay for expensive retrofits or replacements will exacerbate their financial struggles, especially for lower-income households who can least afford these costs.

We are committed to collaborating toward a sustainable path that protects both our residents and our environment. We urge the South Coast Air Quality Management Board to revise its approach to prioritize affordability, reliability, and equitable implementation across all jurisdictions.

Most Sincerely,

Ashleigh Aitken  
Mayor, City of Anaheim