



May 28, 2025

Hon. Vanessa Delgado, Chair
South Coast Air Quality Management District
21865 Copley Dr.
Diamond Bar, CA 91765

RE: OPPOSE – Proposed Amended Rules 1111 & 1121 - as publicly noticed on April 29

Dear Chair Delgado and Governing Board Members,

On behalf of the City of Brea, please accept this letter expressing the City's opposition to AQMD's Proposed Amended Rules (PAR) 1111 and 1121. The City's opposition remains and is reflective of the revised language publicly noticed on April 29, 2025, and discussed at subsequent hearings. While the latest amendments attempt to move in the right direction, they fail to address many of the fundamental concerns we have with the proposed amendments.

The amended rules would have the potential for a significant impact on up to 17 million South Coast homeowners, renters and businesses by regulating air emissions from gas-powered central furnaces and residential-type, natural gas-powered water heaters. The PAR would also impose \$20-plus billion in costs to consumers while providing minimal measurable air quality benefits for the four-county SCAQMD service area. With California's soaring cost of living and many consumers struggling to keep up, now is not the time to impose additional costs on consumers. Beyond the initial cost of the appliances, the amendments do not account for the substantial retrofit and infrastructure upgrade expenses that owners of older homes will have to bear to accommodate the new technology.

Thank you for your time and consideration. We respectfully urge the Board to oppose PAR 1111 and 1121 and explore alternative approaches that balance air quality improvements with economic feasibility for all residents. The Brea City Council shares your commitment to clean air and water, and other quality of life benefits, that draw and retain the residents and business owners who live here. However, the current versions of PAR 1111 and 1121 will deliver consequences that will lead to a variety of negative impacts, impacting jobs and increasing the cost of living in our region. For these reasons, during our May 6, 2025 City Council meeting, my colleagues and I approved and adopted a Resolution opposing the PAR (Attachment).

Sincerely,

Blair Stewart
Mayor

Blair Stewart
Mayor

Cecilia Hupp
Mayor Pro Tem

Christine Marick
Council Member

Marty Simonoff
Council Member

Steven Vargas
Council Member

RESOLUTION NO. 2025-035

A RESOLUTION OF THE CITY COUNCIL OF THE CITY OF BREA OPPOSING SOUTHERN CALIFORNIA AIR QUALITY MANAGEMENT DISTRICT RULES 1111 AND 1121.

A. RECITALS:

- (i) The South Coast Air Quality District (SCAQMD) is a regional air pollution control agency representing Los Angeles, Orange, Riverside and San Bernardino counties with responsibility for regulating stationary sources of air pollution;
- (ii) The SCAQMD is considering two rules that would have a significant impact on up to 17 million South Coast homeowners, renters and businesses: Rule 1111 would regulate air emissions from gas-powered central furnaces; and Rule 1121 would regulate air emissions from residential-type, natural gas-powered water heaters;
- (iii) Rules 1111 and 1121 would impose \$20-plus billion in costs to consumers while providing minimal measurable air quality benefits for the four-county SCAQMD service area; City of Brea in order for the City to remain eligible for these funds.
- (iv) These two rules would ban the use of natural gas-powered furnaces and water heaters in new construction, taking effect in 2026, further elevating construction costs and housing prices, thereby putting homeownership even further out of reach for many Southern Californians. These rules would phase out existing natural gas furnaces and water heaters in existing single family homes, multi-family housing, and businesses in 2027;
- (v) Housing affordability throughout California is and will remain a top public policy priority for Brea for the foreseeable future. Local governments are being pressured to build more housing – specifically, housing that people can afford. Any regulations that increase these costs deserve careful scrutiny to ensure that the increased costs are met with an equal or greater amount of benefit to the consumer;
- (vi) Unlike most SCAQMD rules that regulate large stationary sources of air pollution like oil refineries and warehouses, Rules 1111 and 1121 specifically target individual homeowners, apartment buildings, and businesses large and small – meaning that the costs of these two rules will be directly borne by hard-working families and business owners;

- (vii) Rules 1111 and 1121 would require apartment owners, homeowners and businesses to invest not only in expensive all-electric furnaces and water heaters but would also necessitate that they retrofit homes and businesses with expensive electrical panel upgrades, extensive new plumbing, and physical renovations to accommodate compliant units – further raising the cost of new housing and likely pricing many potential homeowners and renters out of an already expensive market.
- (viii) For apartment owners, the mandate to replace natural gas water heaters and furnaces with all-electric units is incredibly expensive. These significant costs will be passed down to tenants – leading to rent increases and placing additional financial pressure on renters in a region already struggling with housing affordability.
- (ix) The SCAQMD's water heater and furnace mandates will impose a significant increase in electricity demand on California's electric grid. Transitioning to all-electric water heaters and furnaces means increased demand on an electric grid that has not proven capable of consistently meeting existing demand. Water heaters and furnaces are essential elements in any house, apartment or business. Millions of new electric water heaters and furnaces would draw power from the grid and raise the risk of power brownouts or outages.

B. RESOLUTION:

NOW, THEREFORE, be it found, determined and resolved, by the City Council of the City of Brea as follows:

1. Rules 1111 and 1121 will have a profound impact and impose significant costs on millions of Southern California homeowners, renters and businesses who are already struggling to make ends meet while providing minimal air quality benefit;
2. The City of Brea opposes Proposed Amended Rules 1111 and 1121 and urges the SCAQMD to indefinitely delay or cease consideration of these two anti-consumer regulations immediately.

APPROVED AND ADOPTED by the Council of the City of Brea, California, this 6th day of May 2025.



Cecilia Hupp, Mayor Pro Tem

ATTEST:



Lillian Harris-Neal, City Clerk

I, Lillian Harris-Neal, City Clerk of the City of Brea, California, do hereby certify that the foregoing resolution was adopted by the City Council of the City of Brea, California, at its regular meeting held on the 6th day of May 2025, by the following vote:

AYES:	COUNCIL MEMBERS: Hupp, Simonoff, Vargas
NOES:	COUNCIL MEMBERS: Marick.
ABSENT:	COUNCIL MEMBERS: Stewart.
ABSTAINED:	COUNCIL MEMBERS: None.

DATED: May 6, 2025



Lillian Harris-Neal, City Clerk

RESO NO. 2025-35
May 6, 2025