

April 24, 2025

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

Email: <u>mkrause@aqmd.gov</u>; <u>hfarr@aqmd.gov</u>

Subject: Opposition to Amendments to Rules 1111 and 1121 Banning Natural Gas Appliances

Dear Mr. Krause and Ms. Farr,

On behalf of the City of Corona, I am writing to express our strong opposition to the Proposed Amended Rules 1111 and 1121, which mandate zero-emission requirements for residential and commercial space and water heating appliances. While we share SCAQMD's commitment to improving air quality, these amendments pose significant challenges and unintended consequences for our community.

The proposed rules impose prohibitively high replacement costs for appliances, which could range from \$3,000 to \$21,500 per unit when factoring in necessary electrical panel upgrades. These expenses are especially burdensome for lower-income households and small businesses already struggling with significant financial pressures. Although incentive programs like Go Zero provide some relief, they are rebate-based, requiring low-income households to cover the unreasonable upfront costs before reimbursement. Furthermore, with future funding for such incentives being limited and uncertain, the financial strain on affected households and businesses becomes a lasting issue. These requirements risk deepening existing economic inequities within our community, leaving those most vulnerable to bear a disproportionate burden.

Furthermore, transitioning to electric appliances will increase electricity demand, potentially straining the energy grid and leading to higher utility costs for residents and businesses. Without adequate financial assistance or incentives, compliance with these requirements will be unattainable for many, creating further disparities.



Although we recognize the environmental objectives of these amendments, there has been insufficient consideration of financial assistance programs or incentives to mitigate the transition costs. Without robust subsidies or rebates, the proposed rules risk alienating the very communities they aim to support and protect.

While we appreciate the intent of these amendments, the proposed rules in their current form are impractical, inequitable, and economically burdensome. We strongly urge SCAQMD to reevaluate the proposals and collaborate with local governments, businesses, and residents to develop more balanced, inclusive solutions that achieve air quality improvements without disproportionate harm to vulnerable populations.

For these reasons, the City of Corona respectfully opposes Proposed Amended Rules 1111 and 1121. Should you have any questions, please contact our legislative advocate Sharon Gonsalves with California Public Policy Group at 916-974-9270.

Sincerely,

Jim Steiner Mayor