

June 4, 2025

Wayne Nastri, Executive Officer
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765

Re: Opposition to Proposed Amendments to Rules 1111 and 1121

Mr. Nastri,

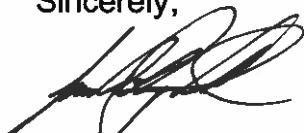
On behalf of the City of Redondo Beach, I am writing to express opposition to the South Coast Air Quality Management District's (SCAQMD) proposed amendments to Rule 1111 (Reduction of Nitrogen Oxides from Natural-Gas-Fired, Fan-Type Central Furnaces) and Rule 1121 (Control of Nitrogen Oxides from Residential Type, Natural-Gas-Fired Water Heaters).

We are concerned that the proposed rule changes, even incorporating the proposed amendments that place sales targets and per unit mitigation fees on manufacturers, will result in an overly burdensome cost on occupants and owners of existing residential units and would work against State affordable Housing mandates. Converting existing residential units to electric furnaces and water heaters would drive expensive service and wiring changes to tens of thousands of existing homes in Redondo Beach, most of which are multi-family housing developments.

The proposed mitigation fees would either drive down availability, or result in the mitigation fees being passed to the consumers that choose to remain with natural gas-fired water heaters and furnaces. Unpermitted modifications to existing electrical wiring could also cause an increase in residential electrical fires. We are also concerned about the ongoing operational costs related to electrical appliances. Please remember, converting to a more efficient heat pump furnace is not a viable option in many of our existing multi-family units.

Thank you for your attention to this important matter. We welcome the opportunity to work with your agency to develop solutions that are both environmentally responsible and socially equitable.

Sincerely,


Jim Light

CC: Honorable Holly J. Mitchell, Los Angeles County Board of Supervisors
Honorable Al Muratsuchi, California Assemblymember, District 66
Honorable Ben Allen, California Senator, District 24
Honorable Vanessa Delgado, Chair South Coast AQMD Board
Jennifer Vinh, South Coast AQMD