

Office of the City Council

April 22, 2025



The Honorable Vanessa Delgado, Chair
South Coast Air Quality Management District Governing Board
21865 Copley Drive
Diamond Bar, CA 91765

SUBJECT: Opposition to Proposed Amended Rules 1111 and 1121

Dear Chair Delgado and Governing Board Members:

The City of Tustin (City) regrets to inform you of its opposition to the two proposed rules being advanced by SCAQMD staff for consideration by your Governing Board, specifically proposed Amended Rules 1111 and 1121 (PAR 1111 and 1121). On behalf of the thousands of families in the City, we have significant concerns regarding the dramatic cost implications proposed by these amendments. The City has adopted an oppose position to this regulation in accordance with its 2025 Legislative Platform, Land Use Policy and Housing, policy statement 26: *Oppose legislation, proposals, or regulations that impose regional, state, or federal growth development or land use planning standards within the City without the City's direct input.*

The City shares your commitment to clean air, water, and other quality-of-life benefits that draw and retain residents and businesses. However, adoption of PAR 1111 and 1121 will lead to a variety of negative impacts, including increased costs of living in our region.

The proposed rules phase in more expensive zero-emission appliances, often requiring costly mechanical, electrical, and plumbing retrofits to existing buildings. While we understand that the phase in of zero emissions will happen over approximately ten years and will never include an outright ban on gas appliances, the proposed rules will drive up the cost of the gas appliance options through supply restrictions and mitigation fees. The end result will be that all options for space and water heating will become more expensive for consumers.

Finally, an evaluation of the ability of Southern California's electricity infrastructure to continue to reliably support the conversion from natural gas to electric appliances has not been conducted. We are concerned that the use of electrical water and space heating will further strain the electrical grid, leaving residents and businesses without space and water heating during blackouts.

We strongly urge the SCAQMD Governing Board to reject PAR 1111 and 1121 due to the dramatic implications proposed by these amendments.

Sincerely,



Austin Lumbard
Mayor

cc: Tustin City Council
 Senator Steven Choi, Ph. D.
 Assembly Member Cottie Petrie-Norris
 Townsend Public Affairs