



CITY of YORBA LINDA

OFFICE OF THE CITY COUNCIL

April 4, 2025

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

Dear Chair Delgado and Governing Board Members,

In a previous [letter dated February 20, 2025](#), the City of Yorba Linda voiced our opposition to South Coast AQMD's Proposed Amended Rules 1111 and 1121 in both their original form *and* the revised concepts that were announced the week prior. To clarify our position, **the City of Yorba Linda still opposes South Coast AQMD's Proposed Amended Rules 1111 and 1121** and strongly urges you to continue engaging with the 17 million stakeholders who would be impacted by such a proposal.

Yorba Linda has several significant concerns regarding the impact of these rules. Foremost among them is the issue of affordability and lack of consumer choice when replacing gas furnaces and water heaters with zero-emission appliances. Hot water and heating are essential human needs. When residents' appliances break down and need replacement, immediate service is paramount. Replacing a gas appliance with an electrical one will require far more intrusive electrical and plumbing upgrades and even physical renovations costing tens of thousands of dollars more – a burden many families and business owners cannot bear. While the revised concepts of PARs 1111 and 1121 provide the illusion of consumer choice, the City does not agree.

Further, the City shares the Orange County Council of Governments' concern that the substantial costs of compliance could compel owners of older multifamily properties to sell or redevelop their buildings, potentially leading to a decrease in affordable housing available throughout the region. If our region's workforce must commute further and further to find affordable housing, any emission reductions from these rules will be offset by substantial increases in vehicle emissions.

Equally concerning is that transitioning the majority of the regional population to all-electric water heaters and furnaces would further increase the demand on California's already inconsistent and delicate power grid. Adding millions of new electric water heaters and furnaces would require a substantial amount of power and increase the potential for brownouts or outages. Furthermore, many residents of Yorba Linda (and many others in AQMD's jurisdiction) have been impacted by Public Safety Power Shutoffs and have lost their electricity for multiple days during critical fire weather conditions; a prime example of why adding more load to the current grid is untenable. The City strongly opposes any



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efforts to add more load demand until the necessary energy generation and electrical transmission capacity is constructed and in service.

Our City Council shares your commitment to provide clean air and water and other quality of life benefits that draw and retain the residents and business owners who live here. However, the proposed amended Rules 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, the City of **Yorba Linda opposes every concept of Proposed Amended Rules 1111 and 1121 that have been publicly announced thus far**. We request that the AQMD Governing Board not proceed with these rules, and instead, we urge the Board to initiate a comprehensive fact-finding process that gathers public comments and addresses concerns related to costs, timing, technology, and the availability of potential incentives.

Sincerely,

Janice Lim
Mayor, City of Yorba Linda