

## James Chavez

---

**From:** dbroome [REDACTED]  
**Sent:** Thursday, February 20, 2025 6:30 AM  
**To:** COB  
**Subject:** [EXTERNAL] Proposed Rules 1111 and 1121

Dear South Coast Air Quality Management District

I am writing you to strongly opposed your proposed Rules 1111 and 1121.

First, you are lying to the public about health benefits of these rules. I reviewed one of your marketing documents regarding these rules, which states that implementation of these rules will prevent 4000 premature deaths, 16,000 new onset of asthma cases, and 4000 ER visits.

Here is a simple question - "If burning natural gas is so dangerous in causing premature deaths, asthma attacks and ER visits, then why are children and adults not dying or getting sick in their homes from natural gas stoves?" Many people don't vent their stovetop when cooking with natural gas. That would make the kitchen the most dangerous place on the planet to live and breathe. Babies aren't dying. And children are not developing asthma in the kitchen. Mothers are not rushing to the ER after cooking a hamburger.

Second, methane / natural gas is the cleanest source of energy. And it is relatively cheap compared to electricity. When combusted, it almost entirely makes carbon dioxide which is not a pollutant. It is plant food. It makes the earth's vegetation grow, so it can make more oxygen. Review your basic science Oxygen-Carbon Dioxide cycle.

Third, SCAQMD is tring to illegally regulate interstate commerce with these proposals. California gets most of its natural gas from Texas and New Mexico. If I want to buy and use natural gas from these states, you have no authority to stop that. You will be sued in Federal court and lose. I have requested President Trump to intervene and issue an executive order to stop your proposed rules.

Fourth, 36% of the California's electricity is produced by burning natural gas. Are you planning to stop this source of electricity as well? This is asinine !

Fifth, these proposed rules will backfire and create more smog / true air pollution. More people will install or stoke up their wood burning fireplaces to heat their homes, rather than pay the high cost of electricity to heat their homes and water. After the gas company spiked their natural gas prices several years ago, I installed a high-efficiency fireplace in my home. I have been burning firewood just about everyday this winter. Stick that in your pipe and smoke it.

Dale Broome MD  
Redlands, CA

Sent with [Proton Mail](#) secure email.

## James Chavez

---

**From:** Baylee Leavitt [REDACTED]  
**Sent:** Tuesday, February 25, 2025 11:57 AM  
**To:** Clerk of Board  
**Cc:** Mike Leavitt  
**Subject:** [EXTERNAL] FW: Opposition to Rules 1111 and 1121

To whom it may concern,

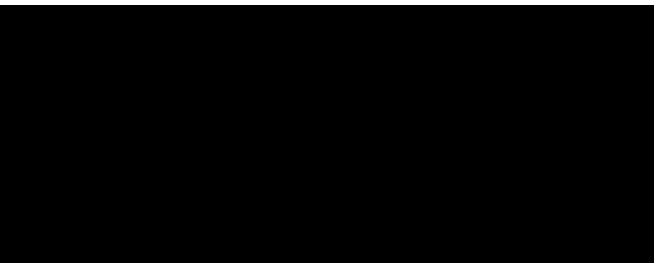
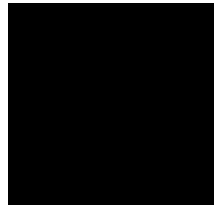
We would like to express our opposition to Rules 1111 and 1121.

While aimed at improving air quality, they are likely to increase housing costs, slow housing development, and limit affordable housing availability. The higher initial and operating costs for electric systems, combined with their impact on property owners and developers, could have lasting negative effects on Southern California's housing market. It is crucial for the AQMD to reconsider these rules and explore more balanced approaches that consider the economic realities faced by residents and businesses.

Sincerely, Baylee & Mike Leavitt

**Baylee Leavitt**

Broker, Seven Eight Realty



A handwritten signature in orange ink, appearing to be a stylized 'S' or 'L'.

---

IMPORTANT: The contents of this email and any attachments are confidential. They are intended for the named recipient(s) only. If you have received this email by mistake, please notify the sender immediately and do not disclose the contents to anyone or make copies thereof.

## James Chavez

---

**From:** Maxine Larson [REDACTED]  
**Sent:** Monday, February 24, 2025 4:34 PM  
**To:** kim@nbaor.com; Clerk of Board  
**Subject:** [EXTERNAL] Re: Please READ... AQMD

Dear AQMD

As a Broker Associate Realtor and Emeritus of the National Association of Realtor, I strongly oppose Rules 1111 and 1121, as these regulations will negatively impact housing, housing development, increase costs, and potentially limit affordable housing availability.

Furthermore, the financial implications of these rules could lead to increased costs for both residential and commercial properties, potentially driving up energy bills and imposing an undue financial burden on property owners. It is essentialso important that your organization considers the economic realities faced by residents and businesses when crafting these policies.

Please see my credentials below, to see I am a Long Time Realtor that has helped over 1,000 clients purchase and sell their homes.  
So I know the struggles they almost all have in this tough market.

Let's all be helpful and NOT Hurtful!!  
Thank You,  
Maxine Larson

Re/Max Fine Homes  
Realtor Emeritus, NAR

--



***National Association of Realtors  
REALTOR EMERITUS RECIPIENT  
Maxine Larson***

[REDACTED]

## James Chavez

---

**From:** Michele Graham [REDACTED]  
**Sent:** Monday, February 24, 2025 8:21 AM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Rules 1111 & 1112

Good morning,

I would like to express my opposition to Rules 1111 & 1112 not just as a professional but as a resident of Costa Mesa. These new regulations will negatively impact housing development and increase costs for developers as well as residents.

While I understand the reasoning behind these rules, I do not feel that we should be mandated to replace our appliances that run perfectly well in 2026. Who will be paying the cost for me to replace my gas furnace & water heater with electric alternatives. I'm not just talking about the new appliances themselves but the electrician to install them plus the infrastructure to run them. This could be very cost prohibitive for all involved!!!

I urge you to oppose Rules 1111 & 1112 in your upcoming May meeting.

Regards,

Michele Graham  
Costa Mesa Resident

Thank you!



Michele D Graham

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

## James Chavez

---

**From:** Gary Cardinale [REDACTED]  
**Sent:** Wednesday, February 26, 2025 10:10 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Proposed Amended Rules 1111 and 1121

I am responding to the two proposals which will require replacement of all natural gas water heaters and furnaces with all electric appliances. This is a huge mistake! It will burden homeowners and landlords with huge payouts to comply and for what benefit? This will require the landlords to recoup their costs by increasing rent. And on top of the purchase and installation expense, the cost of running these devices will cost much more than running the wonderful natural gas appliances that we all use today. Natural gas is clean burning and inexpensive. I am not sure what problem you are trying to solve with these proposed mandates. All you will do is raise costs and make the electric grid more unreliable. Please stop this; this is really nonsense. It benefits no one except perhaps the electric utilities due to increasing demand.

Gary Cardinale

[REDACTED]  
Torrance CA

## James Chavez

---

**From:** Karen Bergman [REDACTED]  
**Sent:** Wednesday, February 26, 2025 6:30 PM  
**To:** COB  
**Subject:** [EXTERNAL] Do not ban gas water heaters and other gas appliances

Please do not force citizens to remove and replace their gas appliances and water heaters. It would be a financial burden with no significant benefit. In addition, these appliances would increase electric power demand on a grid that is increasingly unable to supply consistent power to its existing customers.

Thank you for your attention to this matter.

Alan and Karen Bergman

Redlands, CA residents

Sent from my iPad

## James Chavez

---

**From:** Clay Jorth [REDACTED]  
**Sent:** Wednesday, February 26, 2025 12:55 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Opposition to Rules 1111 and 1121

To the South Coast Air Quality Management District,

I am writing to express my strong opposition to Rules 1111 and 1121 due to their detrimental impact on housing development, affordability, and overall costs. While I understand the intent behind these regulations, their unintended consequences will exacerbate the housing crisis and place an undue burden on homeowners, developers, and communities.

By imposing stricter emissions standards on residential and commercial heating equipment, these rules significantly increase costs for builders and property owners. The added expenses for compliance and equipment upgrades will drive up housing prices, making it even more difficult to meet the growing demand for affordable housing. Furthermore, these regulations could discourage new developments, reducing the availability of much-needed housing and further limiting options for low- and middle-income families.

At a time when housing affordability is a critical issue, policies that restrict supply and increase costs should be reconsidered. I urge you to revisit these regulations and explore more balanced solutions that address environmental concerns without exacerbating the housing crisis.

Thank you for your time and consideration. I appreciate your attention to this urgent matter and look forward to your response.

Sincerely,

Clay Jorth

## James Chavez

---

**From:** Ted May [REDACTED]  
**Sent:** Sunday, February 23, 2025 2:49 PM  
**To:** COB  
**Subject:** [EXTERNAL] Opposition to Rules 1111 and 1121

My Wife and I oppose Rules 1111 and 1121.

we are seniors and these rules we create financial hardship for us and all seniors and low income groups.

Gas water heaters and furnaces essential and a clean sources of heat.

Let the consumer and the free market decide what people should use!

Ted and Jean May



**James Chavez**

---

**From:** Jeff & Sue LeBoff <leboff@verizon.net>  
**Sent:** Thursday, February 27, 2025 4:54 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Banning Gas Appliances

Please bring to the board's attention my concerns about banning gas appliances as stated below.

Jeff LeBoff

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

### **Banning Gas Appliances is a Bad Idea!**

It has come to my attentions the banning gas appliances in California is seriously being considered. I believe that this is a bad idea. The follow discussion includes my reasons for this conclusion. I am a retired engineer who has spent my career in the electric power industry.

- Banning gas appliances will place an untenable burden on many Californians, as discussed below, for little if any benefit. It is likely to yield unintended, negative results. Among those negative results will be the rejection of reasonable regulation and the elimination of existing laws by a skeptical electorate that cannot afford the price for the conversion. We already see this happening in on the federal government.
- The cost of converting gas appliances to electric will be substantial and fall, in many instances, on those least able to pay. The conversion in many cases would include not only replacing appliances but upgrading electrical service and rewiring. The costs could run into the tens of thousands of dollars. Many of us are already upset about having to pay high electric rates to subsidize solar panels, electric rates, and electric cars for wealthy power wasters (welfare for the rich).
- People do not want hear their children crying from being cold or shivering or seeing their lips turning blue. Some of those that cannot afford conversion will turn to dangerous means of heating that will create carbon monoxide fumes, overloaded electrical circuits, and fires. We can look forward to tragic results from banning gas appliances.

- Climate change will already place a burden on electric supply. Increases in AC usage, electric cars and other forms of electric transportation, industrial conversion, AI, water supply pumping and sea water conversion are among the demands that will challenge our ability to provide necessary amounts of electricity. Adding millions of appliances will not help. The result will be either blackouts or purchasing coal generated electricity from neighboring states. How does that help anything?
- What are the plans for when the sun doesn't shine and the wind doesn't blow. Are batteries assumed to provide the electricity when generation isn't available? This will require an enormous amount of batteries at a staggering expense. Batteries are subject to fire and explosions that can spew toxic fumes into the atmosphere. How is that good? What happens when cloudy periods or dust in the atmosphere last longer than the battery capacity? More coal burning?
- Natural gas is a relatively clean burning fuel and more efficient for heating than electricity.
- What about hydrogen? It is a clean burning, carbon free fuel. I would guess that it would be cheaper and easier to convert gas appliances to use hydrogen than electricity.
- I believe that it would be more impactful to create a local/regional mass transit system that is economical, safe, comfortable, reliable and goes where people want to go.

## James Chavez

---

**From:** Carmen Rawson [REDACTED]  
**Sent:** Saturday, March 1, 2025 2:28 PM  
**To:** Clerk of Board; Jennifer Vinh  
**Subject:** [EXTERNAL] Public Comment - Opposition to SCAQMD Proposed Amendments to Rules 1111 and 1121

To Whom It May Concern,

As a Southern California's homeowner and resident **I strongly oppose the SCAQMD proposed amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating)** as these rules will force me to remodel my home at great cost causing a hardship to my family.

These amendments basically eliminate the use of natural gas furnaces and water heaters not only for new buildings but also for existing buildings.

For new buildings the installation of an electric heat pump (for space heating) and an electric water heater could be accommodated as part of the new building's design and construction. However, to make such a change for existing buildings can become a severe/insurmountable financial hardship, especially for multi units/condos buildings with individual space and water heating systems for each unit.

Furthermore, in some dense residential areas there may be not enough space between buildings to install the heat pump system's outdoor units. And most existing units do not have a 240V electrical outlet where the current gas water heaters are installed.

This burden will affect not only homeowners but also the many renters we have in Southern California as, upon failure of the existing gas furnaces and/or existing gas water heaters, landlords will have to obtain city permits and hire contractors to modify their buildings to replace the existing gas units with electric units. This takes a lot of time and, during this process, renters will not have a way to heat the unit or the water in the rental unit.

Even further, our electrical grid is already strain so converting residential appliances from natural gas to electric units will further strain the grid. We already have planned/mandated power outages so additional electrical consumption/demand will further deteriorate the grid reliability. Additionally, the operating cost of electrical appliances is much higher than the operating cost of natural gas appliances so this will be a significant burden for renters - especially for low income renters who may be displaced when paying for electricity becomes out of their reach.

Water heaters and furnaces are not luxury items; they are essential. The proposed amendments will further worsen the housing affordability crisis we have in our state.

I am in support of efforts to improve our air quality but the proposed amendments are not the answer. SCAQMD's heart may be in the right place but the focus is definitely in the wrong place. Rather than banning natural gas furnaces and water heaters the focus should be in improvements and incentives - working with manufacturers to further reduce the NOx emissions of their products.

### **Where the focus should be:**

Wildfires produce nitrogen oxides (NOx) and are a very substantial contributor to air pollution with NOx being considered one of the main pollutants emitted from large-scale wildfires alongside particulate matter and carbon monoxide; essentially, burning biomass during a wildfire releases nitrogen oxides into the atmosphere. Wildfires are a main contributor to global warming.

Rather than focusing on banning natural gas appliances the main focus should be in preventing wildfires by developing better early/advance detection/monitoring systems that would result in a faster wildfire fighting response potentially limiting the size of the wildfire and its related NOx emissions.

Additionally, the focus should be working with So Cal Edison to improve their distribution system so sparks do not start wildfires, etc.

In conclusion, I am requesting herein for SCAQMD to not approve/implement the proposed amendments to Rule 1111 and Rule 1121.

Sincerely,  
Carmen Rawson

## James Chavez

---

**From:** Jamie Amarasuriya [REDACTED]  
**Sent:** Saturday, March 1, 2025 6:51 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] OPPOSE AMENDMENTS

Four adults in our household strongly oppose this egregious proposed overstep of regulation - do not ban our gas heaters and water heaters.

-Jamie Amarasuriya  
-Duleep Amarasuriya  
-Annabeth Amarasuriya  
-Elliott Amarasuriya

Sent from my iPhone

## James Chavez

---

**From:** Camilla Mullen [REDACTED]  
**Sent:** Saturday, March 1, 2025 10:06 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Oppose Amendments

> The two voting adults in our household strongly oppose this egregious proposed overstep of regulation - do not ban our gas heaters and water heaters. This is beyond ridiculous.

Camila & James Mullen

Sent from my iPhone

## James Chavez

---

**From:** Teri [REDACTED]  
**Sent:** Saturday, March 1, 2025 11:21 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Do not do it

We do not want you to change anything regarding our heat and hot water from gas to electric,we can't afford to live in the first place , this will only cause price increases for rentals

## James Chavez

---

**From:** [REDACTED]  
**Sent:** Monday, March 3, 2025 1:25 PM  
**To:** Clerk of Board; Jennifer Vinh  
**Subject:** [EXTERNAL] SCAQMD 06Mar25 Zoom Mtg - Amendments to Rule 1111 (Space Heating) and Rule 1121

To Whom It May Concern,

As a Southern California's homeowner and resident I strongly oppose the SCAQMD proposed amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating) as these rules will force me to remodel my home at great cost causing a hardship to me and my family.

These amendments basically eliminate the use of natural gas furnaces and water heaters not only for new buildings but also for existing buildings.

For new buildings the installation of an electric heat pump (for space heating) and an electric water heater could be accommodated as part of the new building's design and construction. However, to make such a change for existing buildings can become a severe/insurmountable financial hardship, especially for multi units/condos buildings with individual space and water heating systems for each unit.

Furthermore, in some dense residential areas there may be not enough space between buildings to install the heat pump system's outdoor units. And most existing units do not have a 240V electrical outlet where the current gas water heaters are installed.

This burden will affect not only homeowners but also the many renters we have in Southern California as, upon failure of the existing gas furnaces and/or existing gas water heaters, landlords will have to obtain city permits and hire contractors to modify their buildings to replace the existing gas units with electric units. This takes a lot of time and, during this process, renters will not have a way to heat the unit or the water in the rental unit.

Even further, our electrical grid is already strain so converting residential appliances from natural gas to electric units will further strain the grid. We already have planned/mandated power outages so additional electrical consumption/demand will further deteriorate the grid reliability. Additionally, the operating cost of electrical appliances is much higher than the operating cost of natural gas appliances so this will be a significant burden for renters - especially for low income renters who may be displaced when paying for electricity becomes out of their reach.

Water heaters and furnaces are not luxury items; they are essential. The proposed amendments will further worsen the housing affordability crisis we have in our state.

I am in support of efforts to improve our air quality but the proposed amendments are not the answer. SCAQMD's heart may be in the right place but the focus is definitely in the wrong place. Rather than banning natural gas furnaces and water heaters the focus should be in improvements and incentives - working with manufacturers to further reduce the NOx emissions of their products.

Where the focus should be:

Wildfires produce nitrogen oxides (NOx) and are a very substantial contributor to air pollution with NOx being considered one of the main pollutants emitted from large-scale wildfires alongside particulate matter and carbon monoxide; essentially, burning biomass during a wildfire releases nitrogen oxides into the atmosphere. Wildfires are a main contributor to global warming.

Rather than focusing on banning natural gas appliances the main focus should be in preventing wildfires by developing better early/advance detection/monitoring systems that would result in a faster wildfire fighting response potentially limiting the size of the wildfire and its related NOx emissions.



Additionally, the focus should be working with So Cal Edison to improve their distribution system so sparks do not start wildfires, etc.

In conclusion, I am requesting herein for SCAQMD to not approve/implement the proposed amendments to Rule 1111 and Rule 1121.

Rose Perez Jessen  
Newport Beach, CA 90292

## James Chavez

---

**From:** Devin Lucas [REDACTED]  
**Sent:** Monday, March 3, 2025 4:32 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Opposition to Proposed Rules 1111 and 112

Clerk of the Board  
South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765  
[clerkofboard@aqmd.org](mailto:clerkofboard@aqmd.org)

Subject: Opposition to Proposed Rules 1111 and 1121

Dear SCAQMD Board Members,

I am writing to express my strong opposition to the proposed South Coast Air Quality Management District (SCAQMD) Rules 1111 and 1121, which mandate the replacement of residential and commercial gas furnaces and water heaters with electric alternatives starting in 2026. While I fully support responsible environmental policies that improve air quality, these proposed rules impose significant financial and logistical burdens on property owners, housing providers, and local businesses, with far-reaching consequences for housing affordability and availability.

The mandatory transition to electric-only alternatives raises several serious concerns:

1. Financial Hardship on Property Owners – The costs associated with replacing existing gas appliances are substantial, especially for homeowners, landlords, and small businesses. This financial burden will be particularly severe for those with older properties, many of which would require expensive electrical upgrades to accommodate the new requirements.
2. Increased Housing Costs and Reduced Affordability – As a real estate professional, I see firsthand how rising operational costs impact the housing market. We manage several properties in the Orange County area and many landlords are on a fixed budget, utilizing these lifelong investments as retirement income. Additional expenses imposed will only eventually require increased costs of rent, thus further increasing the already excessive cost of housing. These rules could drive up rents, deter much-needed housing development, and create additional barriers to homeownership. With California already facing a housing affordability crisis, this is a step in the wrong direction.
3. Infrastructure and Reliability Concerns – Mandating an all-electric transition without addressing grid capacity and reliability could lead to unintended consequences, including energy shortages and increased utility costs. California's power grid is already under strain, and widespread electrification mandates without sufficient infrastructure improvements could lead to service disruptions.
4. Lack of Feasible Alternatives – While cleaner energy options should be encouraged, viable and cost-effective alternatives must be available before mandates are imposed. Many homeowners and housing providers simply do not have the resources to comply with these requirements without financial

assistance or extended timelines.

For these reasons, I urge the SCAQMD to reconsider these proposed rules and instead explore more balanced, practical solutions that achieve environmental goals without placing excessive burdens on residents and businesses. I respectfully request that the board seek input from industry experts, housing professionals, and community stakeholders to develop policies that support sustainable progress without unintended economic harm.

Thank you for your time and consideration. I appreciate your commitment to improving air quality and hope that the board will take into account the significant concerns raised by the real estate and housing community.

Sincerely,

**DEVIN LUCAS**

[REDACTED]



| [Google Reviews](#) | [Yelp Reviews](#) | [Zillow Reviews](#) | [Avvo Reviews](#) | [Blog](#) | [Newsletter](#) |

## James Chavez

---

**From:** Melina Ershaghi [REDACTED]  
**Sent:** Monday, March 3, 2025 7:31 PM  
**To:** Clerk of Board; Jennifer Vinh  
**Subject:** [EXTERNAL] NOT approve/implement the proposed amendments to Rule 1111 and Rule 1121.

To Whom It May Concern, As a Southern California's homeowner and resident I strongly oppose the SCAQMD proposed amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating) as these rules will force me to remodel by home at great cost causing a hardship to my family. These amendments basically eliminate the use of natural gas furnaces and water heaters not only for new buildings but also for existing buildings. For new buildings the installation of an electric heat pump (for space heating) and an electric water heater could be accommodated as part of the new building's design and construction. However, to make such a change for existing buildings can become a severe/insurmountable financial hardship, especially for multi units/condos buildings with individual space and water heating systems for each unit. Furthermore, in some dense residential areas there may be not enough space between buildings to install the heat pump system's outdoor units. And most existing units do not have a 240V electrical outlet where the current gas water heaters are installed. This burden will affect not only homeowners but also the many renters we have in Southern California as, upon failure of the existing gas furnaces and/or existing gas water heaters, landlords will have to obtain city permits and hire contractors to modify their buildings to replace the existing gas units with electric units. This takes a lot of time and, during this process, renters will not have a way to heat the unit or the water in the rental unit. Even further, our electrical grid is already strain so converting residential appliances from natural gas to electric units will further strain the grid. We already have planned/mandated power outages so additional electrical consumption/demand will further deteriorate the grid reliability. Additionally, the operating cost of electrical appliances is much higher than the operating cost of natural gas appliances so this will be a significant burden for renters - especially for low income renters who may be displaced when paying for electricity becomes out of their reach. Water heaters and furnaces are not luxury items; they are essential. The proposed amendments will further worsen the housing affordability crisis we have in our state. I am in support of efforts to improve our air quality but the proposed amendments are not the answer. SCAQMD's heart may be in the right place but the focus is definitely in the wrong place. Rather than banning natural gas furnaces and water heaters the focus should be in improvements and incentives - working with manufacturers to further reduce the NOx emissions of their products. Where the focus should be: Wildfires produce nitrogen oxides (NOx) and are a very substantial contributor to air pollution with NOx being considered one of the main pollutants emitted from large-scale wildfires alongside particulate matter and carbon monoxide; essentially, burning biomass during a wildfire releases nitrogen oxides into the atmosphere. Wildfires are a main contributor to global warming. Rather than focusing on banning natural gas appliances the main focus should be in preventing wildfires by developing better early/advance detection/monitoring systems that would result in a faster wildfire fighting response potentially limiting the size of the wildfire and its related NOx emissions. Additionally, the focus should be working with So Cal Edison to improve their distribution system so sparks do not start wildfires, etc. In conclusion, I am requesting herein for SCAQMD to not approve/implement the proposed amendments to Rule 1111 and Rule 1121.

## James Chavez

---

**From:** Carla Esparza [REDACTED]  
**Sent:** Monday, March 3, 2025 8:04 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] Water heater

Hello,

My name is Carla Lomeli and I live in North Tustin, I absolutely do not want an electric water heater.

Sent from my iPhone

## James Chavez

---

**From:** L M [REDACTED]  
**Sent:** Tuesday, March 4, 2025 9:52 AM  
**To:** Clerk of Board; Jennifer Vinh  
**Subject:** [EXTERNAL] Please Reject proposed amendments to Rule 1111 and Rule 1121.

To Whom It May Concern,

As a Southern California's homeowner and resident I strongly oppose the SCAQMD proposed amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating) as these rules will force me to remodel my home at great cost causing hardship to my family.

These amendments basically eliminate the use of natural gas furnaces and water heaters not only for new buildings but also for existing buildings.

For new buildings the installation of an electric heat pump (for space heating) and an electric water heater could be accommodated as part of the new building's design and construction. However, to make such a change for existing buildings can become a severe/insurmountable financial hardship, especially for multi units/condos buildings (such as my own) with individual space and water heating systems for each unit.

Furthermore, in some dense residential areas such as my own there may not be enough space between buildings to install the heat pump system's outdoor units. And most existing units do not have a 240V electrical outlet where the current gas water heaters are installed.

This burden will affect not only homeowners but also the many renters we have in Southern California as, upon failure of the existing gas furnaces and/or existing gas water heaters, landlords will have to obtain city permits and hire contractors to modify their buildings to replace the existing gas units with electric units. This takes a lot of time and, during this process, renters will not have a way to heat the unit or the water in the rental unit.

Even further, our electrical grid is already strained. Converting residential appliances from natural gas to electric units will further strain the grid. We already have planned/mandated power outages so additional electrical consumption/demand will further deteriorate grid reliability. Additionally, the operating cost of electrical appliances is much higher than the operating cost of natural gas appliances so this will be a significant burden for renters - especially for low income renters who may be displaced when paying for electricity becomes out of their reach.

Water heaters and furnaces are not luxury items; they are essential. The proposed amendments will further worsen the housing affordability crisis we have in our state.

I am in support of efforts to improve our air quality but the proposed amendments are not the answer. SCAQMD's heart may be in the right place but its focus is definitely in the wrong place. Rather than banning natural gas furnaces and water heaters the focus should be in improvements and incentives - working with manufacturers to further reduce the NOx emissions of their products.

Where the focus should be:

Wildfires produce nitrogen oxides (NO<sub>x</sub>) and are a very substantial contributor to air pollution with NO<sub>x</sub> being considered one of the main pollutants emitted from large-scale wildfires alongside particulate matter and carbon monoxide; essentially, burning biomass during a wildfire releases nitrogen oxides into the atmosphere. Wildfires are a main contributor to global warming.

Rather than focusing on banning natural gas appliances the main focus should be in preventing wildfires by developing better early/advance detection/monitoring systems that would result in a faster wildfire fighting response potentially limiting the size of the wildfire and its related NO<sub>x</sub> emissions.

Additionally, the focus should be working with So Cal Edison to improve their distribution system so sparks do not start wildfires, etc.

In conclusion, I am requesting herein for SCAQMD to not approve/implement the proposed amendments to Rule 1111 and Rule 1121.

Larry Mathena

## James Chavez

---

**From:** Ronald Bergen [REDACTED]  
**Sent:** Tuesday, March 4, 2025 5:07 PM  
**To:** Clerk of Board; Jennifer Vinh  
**Subject:** [EXTERNAL] NO ON 1111 & 1121!!

The South Coast Air Quality Management District (SCAQMD) is considering two new rules - 1111 and 1121 - that will strain our electrical grid further, increase costs to homeowners and have little effect on air quality. Water heaters and furnaces are not luxury items; they are essential. Californians are facing a housing shortage and housing affordability crisis; now is the wrong time to put new, expensive, rushed mandates in place. I am In complete support of efforts to Improve our air quality. These proposed rules have not shown that they will make any substantive improvement. Yet, the pain homeowners will feel to their pocketbooks as they are forced to construct spaces for bigger devices, rewire for new electric designs and pay for electricity - with appliances pulling from an already unstable power supply - will be significant.

CA RANKS 50TH IN ENERGY COST: 92% HIGHER THAN THE NATIONAL AVERAGE.

Let's look for improvements and incentives; not bans and mandates. Renters will feel this pain, too. Adding these rules as another unnecessary expense will not help. If we are going to work to improve our air quality, which I support, we need to do it in a more affordable and effective way.

Please vote NO on 1111 & 1121!

Respectfully,  
Ronald L Bergen  
Newport Beach, CA



## James Chavez

---

**From:** Jean Batley [REDACTED]  
**Sent:** Tuesday, March 4, 2025 9:15 PM  
**To:** Clerk of Board  
**Subject:** [EXTERNAL] OPPOSITION TO Amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating) Public Consultation

As a homeowner and rental property owner who just this year finished upgrading our water heaters and heating/air conditioning system, we seriously oppose these two amendments.

The economic hardship would be extreme to "re-do" these systems.

The impact on the environment is so minuscule as to be ridiculous! Government overreach is too much!

DO NOT PASS THESE AMENDMENTS!

Jean and Craig Batley

## James Chavez

---

**From:** Suzy McLaughlin [REDACTED]  
**Sent:** Wednesday, March 5, 2025 2:59 PM  
**To:** Clerk of Board; Jennifer Vinh  
**Subject:** [EXTERNAL] SCAQMD Proposed Amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating)

To Whom It May Concern,

As a Southern California's homeowner and resident I strongly oppose the SCAQMD proposed amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating) as these rules will force me to remodel my home at great cost causing a hardship to my family.

These amendments basically eliminate the use of natural gas furnaces and water heaters not only for new buildings but also for existing buildings.

For new buildings the installation of an electric heat pump (for space heating) and an electric water heater could be accommodated as part of the new building's design and construction. However, to make such a change for existing buildings can become a severe/insurmountable financial hardship, especially for multi units/condos buildings with individual space and water heating systems for each unit.

Furthermore, in some dense residential areas there may be not enough space between buildings to install the heat pump system's outdoor units. And most existing units do not have a 240V electrical outlet where the current gas water heaters are installed.

Our electrical grid is already strained so converting residential appliances from natural gas to electric units will further strain the grid. We already have planned/mandated power outages so additional electrical consumption/demand will further deteriorate the grid reliability. Additionally, the operating cost of electrical appliances is much higher than the operating cost of natural gas appliances so this will be a significant burden for renters - especially for low income renters who may be displaced when paying for electricity becomes out of their reach.

**Water heaters and furnaces are not luxury items; they are essential.** The proposed amendments will further worsen the housing affordability crisis we have in our state.

I am in support of efforts to improve our air quality but the proposed amendments are not the answer. SCAQMD's heart may be in the right place but the focus is definitely in the wrong place. Rather than banning natural gas furnaces and water heaters the focus should be in improvements and incentives - working with manufacturers to further reduce the NOx emissions of their products.

Where the focus should be:

Wildfires produce nitrogen oxides (NOx) and are a very substantial contributor to air pollution with NOx being considered one of the main pollutants emitted from large-scale wildfires alongside particulate matter and carbon monoxide; essentially, burning biomass during a wildfire releases nitrogen oxides into the atmosphere. Wildfires are a main contributor to global warming.

Rather than focusing on banning natural gas appliances the main focus should be in preventing wildfires by developing better early/advance detection/monitoring systems that would result in a faster wildfire fighting response potentially limiting the size of the wildfire and its related NOx emissions.

Additionally, the focus should be working with So Cal Edison to improve their distribution system so sparks do not start wildfires, etc.

In conclusion, I am requesting herein for SCAQMD to not approve/implement the proposed amendments to Rule 1111 and Rule 1121.

Please don't do this - I am approaching retirement age and cannot take on this financial hardship!!

Thank you,

Suzanne McLaughlin

**James Chavez**

---

**From:** Autumn Kramer [REDACTED]  
**Sent:** Wednesday, March 5, 2025 3:46 PM  
**To:** Clerk of Board; Jennifer Vinh  
**Subject:** [EXTERNAL] Opposition to Amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating)

To Whom It May Concern,

As a Southern California homeowner and resident, I greatly oppose the SCAQMD proposed amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating) as these rules will force me to remodel my home at great cost causing financial hardship

These amendments basically eliminate the use of natural gas furnaces and water heaters for new & existing buildings. We don't have the extra funds to make these changes when our current natural gas furnace & water heater are in perfect condition.

In conclusion, I am requesting herein for SCAQMD to not approve/implement the proposed amendments to Rule 1111 and Rule 1121.

Thank you for your consideration,

**Autumn Kramer**  
**Southern California Homeowner**

## James Chavez

---

**From:** [REDACTED]  
**Sent:** Thursday, March 6, 2025 5:10 AM  
**To:** Jennifer Vinh; Clerk of Board  
**Cc:** 'Carmen Rawson'; [REDACTED]  
**Subject:** [EXTERNAL] Rule1111 & Rule1121

Dear AQMD,

As a Southern California's homeowner and resident, I strongly oppose the SCAQMD proposed amendments to Rule 1111 (Space Heating) and Rule 1121 (Water Heating) as these rules will force me to remodel my home at great cost causing a hardship to my family. The benefit to the south coast air shed is negligible compared to the cost to the resident. Enacting this rule is way beyond the authority we, as residents and voters, have authorized you to do.

Regards

Dan Burt, [REDACTED], Newport Beach CA