

APPENDIX E:

**COMMENT LETTERS RECEIVED AFTER CLOSE OF
COMMENT PERIOD**

Comments Received from March 21, 2025 to March 28, 2025

COMMENT LETTERS

This appendix contains those letters listed in the tables below that were received from March 21, 2025 to March 28 2025.

Table Appendix E-1: Comments Received from March 21, 2025 to March 28, 2025

Letter	Date Received	Commentor Name	Representing	Category	# of Letters
1	3/23/2025	Jesse Biebesheimer	Self	Resident	1
2	3/26/2025	Faith Bautista	National Diversity Coalition	Other	1
3	3/21/2025	Roy Profitt	Self	Resident	1
4		Various	Self	Resident	116
5	3/27/2025	Stuart Waldman	Valley Industry & Commerce Association	Other	1
6	3/28/2025	Leah Skinner	Carson Chamber of Commerce	Other	1
7	3/28/2025	Paul Little	Pasadena Chamber of Commerce and Civic Association	Other	1
8	3/21/2025	Erin Pak	Kheir Clinic	Business	1

COMMENT LETTER #1: JESSE BIEBESHEIMER

Marissa Poon

From: Jennifer Vinh
Sent: Tuesday, March 25, 2025 8:32 AM
To: [REDACTED]
Subject: FW: Contact Form

From: South Coast AQMD <[REDACTED]>
Sent: Sunday, March 23, 2025 4:01 PM
To: Jennifer Vinh <jvinh@aqmd.gov>
Subject: Contact Form

Contact Form

Name: Jesse Biebesheimer

Email: [REDACTED]

Phone: [REDACTED]

Message:

As a long time resident of Huntington Beach, I am writing to voice my opposition to the Proposed Amended Rules 1111 and 1121. I already live in an area subject to the SCAQMD's strict requirements for Ultra-low NOx emitting water heaters and furnaces. I am opposed to further banning or restricting gas-fueled appliances for existing homes, as is proposed. Furnaces and water heaters are essential appliances in every household. Driving the costs higher though mandates and bans is

not fair to lower-income residents. Consumers should be incentivized to adopt these theoretically lower-emission technologies, but they should not be mandated to do so, and traditional gas-fueled products should not be "banned" or removed from the market. This simply serves to limit choice and drive up consumer prices. Furthermore, when such an appliance breaks down, replacement is typically urgent, stressful, and already very costly. It is not appropriate to force homeowners in need of an urgent replacement to suddenly have to search for electrical contractors to simultaneously replace their electrical panels and wiring in order to accomplish the installation of an electric water heater, furnace, or heat pump. Consumers should have the freedom to do a like-for-like replacement when one of these products breaks down and needs replacement. Even an exception for repairs is not sufficient -- it will drive homeowners to continue to "put bandaids" on problems, when a more cost effective long-term solution is replacement with a brand new similar unit. It may be reasonable to mandate these changes in brand new construction, but not for existing homes making periodic maintenance replacements. Thank you for your consideration of this viewpoint. Regards, Jesse Biebesheimer Homeowner Huntington Beach, California

COMMENT LETTER #2: NATIONAL DIVERSITY COALITION

March 26, 2025

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

RE: OPPOSE – Proposed Amended Rules 1111 & 1121 - as released February 28

Dear Chair Delgado and Governing Board Members:

On behalf of the National Diversity Coalition, we write to express our opposition to the proposed amendments to Rules 1111 and 1121. National Diversity Coalition is an empowering voice for our nation's minority and low-income communities, particularly in California, at every level of government and within the business community.

While the latest rule concept attempts to move in the right direction, it fails to address many of the fundamental concerns we have with the proposed amendments.

Beyond the initial cost of the appliances, the amendments do not account for fo on homeowners, renters, and business owners—many of whom can least afford it.

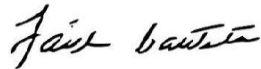
Additionally, we are deeply concerned about the increased strain these rules will place on an already aging electrical grid. This grid not only relies on nonrenewable sources, such as natural gas to generate power, but is also ill-equipped to handle excessive new demand, posing a significant public safety risk. Residents have already endured frequent blackouts and service interruptions, and since 2015, electric power lines have caused six of the 20 most devastating wildfires in our community. Furthermore, numerous residential and commercial projects are currently on hold due to a lack of available power.

Many Southern California families are already struggling with high living costs, and mandating costly retrofits or replacements will only exacerbate financial hardships. These rules disproportionately impact lower-income households, which are the least able to afford such expenses.

While we understand and support the Air District's efforts to improve air quality, the proposed amendments would impose an undue and significant burden on homeowners, renters, and small businesses.

Thank you for your time and consideration. We respectfully urge the Board to explore alternative approaches that balance air quality improvements with economic feasibility for all residents.

Sincerely,



Faith Bautista

President & Chief Executive Officer, National Diversity Coalition

Email: faith@nationaldiversitycoalition.org

COMMENT LETTER #3: ROY PROFITT

Marissa Poon

From: Emily Yen
Sent: Thursday, March 27, 2025 8:58 AM
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Contact Form

From: [REDACTED] <[REDACTED]>
Sent: Friday, March 21, 2025 6:59 PM
To: Emily Yen <EYen@aqmd.gov>
Subject: Contact Form

Contact Form

Name: ROY PROFITT

Email: [REDACTED]

Phone: [REDACTED]

Message:

I urge a NO vote. There isn't a climate emergency, our state is ran by fruits and nuts. They continue to imagine foolish and strange conditions which don't exist in our world. Our governor has tried to make the once Golden State a 3rd world country. We have homeless people everywhere (that is a concern), we can't get medical appointments for several months, illegals are living here,

and some people want to ban gas water heaters (don't be deceived). Do the morally right thing and VOTE NO!

COMMENT LETTER #4: VARIOUS

To: Carlos Rodriguez, Curt Hagman, Larry McCallon, Manuel Perez, Michael Cacciotti, Patricia Lock Dawson, Vanessa Delgado, Janet Nguyen, Brenda Olmos, Jennifer Vinh

Subject: URGENT: Please Oppose Rules 1111 & 1121

I am writing as a South Coast Air Basin resident in strong opposition to Proposed Amended Rules 1111 & 1121. These rules directly affect the general public, not just large facilities or industries but homeowners and renters, like me.

Under newly amended proposed Rules 1111 and 1121, the consumer will still be left with a higher price tag, and in this case, it will be the renters and homeowners who bear the brunt of the manufacturer's fee at the end of the day.

Additionally, upgrading buildings with new electric appliances and wiring is a costly process, which I understand is very likely in excess of \$30,000 or more per unit. These high costs will likely lead to rent increases, placing additional financial pressure on tenants in a region already struggling with housing affordability. At a time when the housing market is already under strain, increased costs and the potential for tenant displacement will only make it more challenging for renters and landlords alike, worsening Southern California's housing affordability crisis.

With this added ruling, SCAQMD just added to the cost of living crisis by creating an impossible scenario where Southern California residents must decide between 1) having to install a more costly electric heat pump with an estimated price tag of \$6,000 or 2) replacing their current gas water heater at an average cost of \$1500 or more plus additional fees!

Beyond the higher purchase cost, consumers will also need to secure permits if they choose the electric route, which could mean waiting for months without hot water or having to rent a temporary heat pump in the meantime. These rules apply not only to water heaters but also to space heating, adding to the burdens already imposed by recent rules on pool heaters.

Finally, I know my friends, neighbors, and most residents are unaware of the upcoming requirements and the significant costs involved. Despite holding public workshops, the SCAQMD has not conducted sufficient outreach to inform and engage the broader community. Without targeted communication through mainstream media and other accessible channels, residents who are directly impacted have not and will not have an adequate opportunity to understand or voice concerns about these extremely expensive rules.

Thank you for your time and consideration.

I respectfully urge the Board to oppose Rules 1111 & 1121.

FIRST NAME	LAST NAME	ADDRESS	CITY	ZIP	EMAIL
Vanessa	Cisneros	[REDACTED]	Walnut	91789	[REDACTED]
Jessica	Coonrod	[REDACTED]	Chino	91710	[REDACTED]
Kim Joseph	Cousins	[REDACTED]	Lake Elsinore	92530	[REDACTED]
Cesar	Khandjian	[REDACTED]	Temecula	92592	[REDACTED]
Luis	Garcia	[REDACTED]	San Bernardino	92410	[REDACTED]
Elena	Fowler	[REDACTED]	PALM DESERT	92260	[REDACTED]
John	Weithas	[REDACTED]	Pasadena	91105	[REDACTED]
Samantha	Argosino	[REDACTED]	Chino Hills	91709	[REDACTED]
Tina	Javid	[REDACTED]	Chino Hills	91709	[REDACTED]
Craig	Snow	[REDACTED]	Redondo Beach	90277	[REDACTED]
Craig	Michael	[REDACTED]	Chino Hills	91709	[REDACTED]
Mae	Gentry	[REDACTED]	Burbank	91501	[REDACTED]
Monica	Lopez	[REDACTED]	San Bernardino	92408	[REDACTED]
ROBERT	EVANS	[REDACTED]	laguna hills	92653	[REDACTED]
VICKIE	TALLEY	[REDACTED]	Laguna Hills	92653	[REDACTED]
Gerry	Gutierrez	[REDACTED]	Pico Rivera	90660	[REDACTED]
Lisa	Gutierrez	[REDACTED]	Pico Rivera	90660	[REDACTED]
Eric	Rivera	[REDACTED]	Pico Rivera	90660	[REDACTED]
Bianca	Rivera	[REDACTED]	Whittier	90605	[REDACTED]
Kristine	Scott	[REDACTED]	Rancho Cucamonga	91730	[REDACTED]
Ron	Henderson	[REDACTED]	West Hills	91304	[REDACTED]
Louisa	Henry	[REDACTED]	Newhall	91321	[REDACTED]
Kelly	Laird	[REDACTED]	Seal Beach	90740	[REDACTED]
Denny	Rockwell	[REDACTED]	Placentia	92870	[REDACTED]
Darci	Castillejos	[REDACTED]	Menifee	92585	[REDACTED]
Tracey	Garamone	[REDACTED]	Murrieta	92563	[REDACTED]
Wenjiao	Ma	[REDACTED]	Irvine	92602	[REDACTED]
Mary	King-Batiste	[REDACTED]	Bellflower	90706	[REDACTED]
Nancy	Lulejian Starczyk	[REDACTED]	Los Angeles	91326	[REDACTED]
Robin	Clinch	[REDACTED]	Long Beach	90804	[REDACTED]
Hanh	Truong	[REDACTED]	Moreno Valley	92551	[REDACTED]
Connie	Berduo	[REDACTED]	Whittier	90606	[REDACTED]

Wendy	Lin	[REDACTED]	Placentia	92870	[REDACTED]
Renate	Holloway	[REDACTED]	Anaheim	92801	[REDACTED]
Sally	Ragan	[REDACTED]	Diamond Bar	91765	[REDACTED]
Julia	Huntsman	[REDACTED]	Long Beach	90809	[REDACTED]
Lou	Thomas	[REDACTED]	Yorba Linda	92886	[REDACTED]
Donald	Rabbitt	[REDACTED]	Yorba Linda	92887	[REDACTED]
Cheri	Kelley	[REDACTED]	Norwalk	90650	[REDACTED]
Ron	Berger	[REDACTED]	Manteca	95336	[REDACTED]
Will	Alarcon	[REDACTED]	Walnut	91710	[REDACTED]
Shirley	Yeh	[REDACTED]	Chino	91710	[REDACTED]
Carlos	Barron	[REDACTED]	La Mirada	90638	[REDACTED]
Celia	Rangel	[REDACTED]	Orange	92867	[REDACTED]
cesar	Llanes	[REDACTED]	Walnut	91789	[REDACTED]
Neal	Gagliano	[REDACTED]	Huntington Beach	92649	[REDACTED]
Joe	Liuzzi	[REDACTED]	Orange	92869	[REDACTED]
xiomara	vasquez	[REDACTED]	Chino Hill	91709	[REDACTED]
Cesar	Caballero	[REDACTED]	La Habra	90631	[REDACTED]
Elvia	Alvarez	[REDACTED]	18726 Aguiro St	91748	[REDACTED]
Diane	Todd	[REDACTED]	Menifee	92586	[REDACTED]
Sylvia	Cruz-Ron	[REDACTED]	Chino Hills	91709	[REDACTED]
patrick	chen	[REDACTED]	walnut	91789	[REDACTED]
Nittaya	Pichedvanichok	[REDACTED]	Irvine	92602	[REDACTED]
SUE-HWA	LIU	[REDACTED]	Tustin	92780	[REDACTED]
Bob	Arneal	[REDACTED]	Anaheim Hills	92807	[REDACTED]
Laura	Greene	[REDACTED]	Rancho Cucamonga	91701	[REDACTED]
Raul	Lozano	[REDACTED]	Fontana	92337	[REDACTED]
Lucy	Ramirez	[REDACTED]	Santa Ana	92704	[REDACTED]
Carl	NALBONE	[REDACTED]	Long Beach	90803	[REDACTED]
Dominic	Nguyen	[REDACTED]	Pomona	91766	[REDACTED]
Scott	Chaplin	[REDACTED]	Orange	92867	[REDACTED]
Lin	Yann	[REDACTED]	Anaheim	92804	[REDACTED]
Shannon	Sternagle	[REDACTED]	Long Beach	90808	[REDACTED]
Kelly	McConnell	[REDACTED]	Santa Ana, CA	92706	[REDACTED]
Desiree	Jones	[REDACTED]	Laguna Niguel	92677	[REDACTED]

Heidi	Burns	[REDACTED]	Long beach	90853	[REDACTED]
Carol	Laughlin	[REDACTED]	Yorba Linda	92886	[REDACTED]
Nancy	Lucia	[REDACTED]	Tustin	92780	[REDACTED]
Jennifer	Pillon	[REDACTED]	Fullerton	92831	[REDACTED]
Theresa	Miller	[REDACTED]	Bellflower	90706	[REDACTED]
Raymond	Sonoda	[REDACTED]	Lakewood	90713	[REDACTED]
sharon	tai	[REDACTED]	la mirada	90638	[REDACTED]
Graciela	Ricaud	[REDACTED]	Fullerton	92833	[REDACTED]
WEN KAI	SUNG	[REDACTED]	Walnut	91789	[REDACTED]
Bruce	Wen	[REDACTED]	TORRANCE	90501	[REDACTED]
Rosalina	Laguna	[REDACTED]	Montclair	91763	[REDACTED]
Patricia	LaFosse	[REDACTED]	Covina	91724	[REDACTED]
CathyLyn	Brooks	[REDACTED]	Huntington Beach	92649	[REDACTED]
Debra	Greco	[REDACTED]	Long Beach	90803	[REDACTED]
Lisa	Dunn	[REDACTED]	Long Beach	90807	[REDACTED]
Marina	RL	[REDACTED]	Diamond Bar	91765	[REDACTED]
Suzanne	Daley	[REDACTED]	Temecula	92592	[REDACTED]
Beena	Khakhria	[REDACTED]	Phillips Ranch	91766	[REDACTED]
Kate	Johansen	[REDACTED]	Tustin	92780	[REDACTED]
Clevil	Heraux	[REDACTED]	Signal Hill	90755	[REDACTED]
AMIE	CHEN	[REDACTED]	Hacienda Heights	91745	[REDACTED]
JACQUELYN	WILSON	[REDACTED]	West Covina	91790	[REDACTED]
Phil	Schaefer	[REDACTED]	Santa Ana	92706	[REDACTED]
Matt	Mayo	[REDACTED]	Long Beach	90804	[REDACTED]
JUDY	BARR	[REDACTED]	ORANGE	92869	[REDACTED]
Raymond	Daitch	[REDACTED]	Irvine	92612	[REDACTED]
Melvin	Steiner	[REDACTED]	Santa Ana	92706	[REDACTED]
Loree	Swanenburg	[REDACTED]	Rossmoor	90720	[REDACTED]
John	Villaescusa	[REDACTED]	NORWALK	90650	[REDACTED]
Marvin	Byrne	[REDACTED]	Whittier	90601	[REDACTED]
Amanda	Lazo	[REDACTED]	Loma Linda	92354	[REDACTED]
Matt	Brown	[REDACTED]	Grand Terrace	92313	[REDACTED]
Cooper	Strull	[REDACTED]	Newport Beach	92660	[REDACTED]
Kate	Yust	[REDACTED]	Tustin	92780	[REDACTED]
Lori	Carraway	[REDACTED]	Tustin	92780	[REDACTED]
James	Larsen	[REDACTED]	Loma Linda	92373	[REDACTED]
Ranae	Larsen	[REDACTED]	Loma Linda	92373	[REDACTED]
Anne	Larsen	[REDACTED]	Loma Linda	92354	[REDACTED]
Jessica	Rood	[REDACTED]	San Clemente	92672	[REDACTED]
Michaeljohn	Martinez	[REDACTED]	Chino	91710	[REDACTED]

Jacqueline	Fernandez	[REDACTED]	Chino	91710	[REDACTED]
Cherie	Pondoff	[REDACTED]	Murrieta	92563	[REDACTED]
Nicole	Suydam	[REDACTED]	Aliso Viejo	92656	[REDACTED]
Michelle	Murphy	[REDACTED]	Irvine	92614	[REDACTED]
Steve	Horn	[REDACTED]	San Diego	92129	[REDACTED]
Frances	Dunn	[REDACTED]	Villa park	92861	[REDACTED]
Russell	Tao	[REDACTED]	Whittier	90603	[REDACTED]
Kelly	Turbeville	[REDACTED]	Trabuco Canyon	92679	[REDACTED]
Galen	Alldrin	[REDACTED]	Ballico	95303	[REDACTED]
Danielle	Corliss	[REDACTED]	Dove Canyon	92679	[REDACTED]

COMMENT LETTER #5: VALLEY INDUSTRY & COMMERCE ASSOCIATION

March 27, 2025

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

SUBJECT: OPPOSE – Proposed Amended Rules 1111 & 1121 - as released February 28

Dear Chair Delgado and Governing Board Members,

On behalf of the Valley Industry & Commerce Association (VICA), we write to express our strong opposition to Proposed Amended Rules (PAR) 1111 and 1121. Our concerns are based on the revised language released on February 28, 2025, and the negative impact these rules pose for the region's economic vitality.

While we understand and support efforts to improve air quality, the current amendments create disproportionate and unnecessary financial burdens for businesses and working families—particularly in the form of increased compliance costs, higher consumer prices, and costly retrofits.

The amended rules would either require consumers to switch to significantly more expensive "all-electric" space and water heaters or face increased costs passed down by manufacturers paying compliance fees to continue offering natural gas appliances. These policies ignore market realities and affordability challenges, placing businesses—especially small businesses and property owners—in an impossible position.

Projected to cost over \$300 million annually, or \$7.7 billion over 25 years, these rules will severely impact businesses that are already operating on thin margins. This is especially concerning in a region like Southern California, where commercial tenants and landlords are already grappling with high energy bills, inflationary pressures, and a challenging regulatory environment.

An alternative path—such as establishing ultra-low NOx emission standards for natural gas appliances—could achieve meaningful environmental outcomes without forcing costly technology shifts or disrupting established markets. This approach would also allow manufacturers and businesses to innovate within existing infrastructure, avoiding unnecessary grid strain and capital expenditures.

Moreover, the amendments fail to consider the massive retrofitting costs that would fall on commercial property owners, multifamily housing operators, and small businesses occupying older structures. These infrastructure changes could cost tens of thousands of dollars per building and pose significant logistical challenges in areas with outdated electrical systems or limited power access.

The additional burden on California's aging and overstressed electrical grid also raises major concerns. Many business developments are already delayed due to energy constraints, and these rules will only exacerbate the issue by accelerating demand without sufficient infrastructure investment. As we've seen, unreliable power supply leads to operational disruptions, safety hazards, and even contributes to catastrophic wildfires.

Southern California businesses are working hard to remain competitive in a high-cost environment. Saddling them with aggressive mandates that offer limited flexibility and significant expense undermines economic development, workforce stability, and our region's ability to grow sustainably.

Valley Industry & Commerce Association • 16600 Sherman Way, Suite 170 Van Nuys, CA 91406 • phone: 818.817.0545 • fax: 818.907.7934 • www.vica.com



VICA urges the Board to reconsider this one-size-fits-all regulatory approach and instead engage with stakeholders to develop pragmatic solutions that protect both the environment and our local economy.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stuart Waldman', is written over a horizontal line.

Stuart Waldman
VICA President

Valley Industry & Commerce Association • 16600 Sherman Way, Suite 170 Van Nuys, CA 91406 • phone:
818.817.0545 • fax: 818.907.7934 • www.vica.com

COMMENT LETTER #6: CARSON CHAMBER OF COMMERCE

Board of Directors
Executive Committee
Chairman
 Richard Chang
 Premier Printing & Graphics
Treasurer
 Andy Stanley
 Morgan Stanley
Vice Chair, Government Affairs
 Trini Jimenez
 Watson Land Company
Vice Chair, Leadership Carson
 Kubi Karul
 SA Recycling
Vice Chair, Strategic Initiatives
 Tamala Lewis
 Dignity Health Sports Park
Vice Chair, Economic Development
 Michael Stewart
 M & B Associates
Vice Chair, Special Events
 Lena Whittaker
 Magnificent Events
Directors
 Jean Bell
 CM Ministerial Consulting
 Ben Brower
 Ineos Polypropylene
 Norwood Clark
 Darrow's New Orleans Grill
 Ralph Felix
 California Water Service Co.
 Julio Flores
 DoubleTree by Hilton Carson
 Lyman Fox
 Kaiser Permanente, South Bay
 Victor Ibarra
 Marathon
 Tami Lorenzen-Fanselow
 Price Transfer, Inc.
 Derrick Mims
 CSU Dominguez Hills
 Shannon Moody
 Air Products & Chemicals
 Mariane Torhus
 IKEA US West, Inc

March 28, 2025

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

RE: OPPOSE – Proposed Amended Rules 1111 & 1121 - as released February 28

Dear Chair Delgado and Governing Board Members:

On behalf of Carson Chamber of Commerce, we write to express our opposition to Proposed Amended Rules (PAR) 1111 and 1121. Our opposition is reflective of the revised language officially released on February 28, 2025, and discussed at subsequent hearings.

While the latest amendments attempt to move in the right direction, they fail to address many of the fundamental concerns we have with the proposed amendments.

SCAQMD Amended Rules 1111 and 1121 mandate higher costs on consumers. Both amended rules force consumers to choose a much more expensive option of "all-electric" space and water heaters that cost thousands more than natural gas appliances or require consumers to pay higher costs, through the fees imposed on manufacturers, to continue using natural gas furnaces and water heaters.

These amended rules will burden consumers with over \$300 million annually or \$7.7 billion over the 25-year life of these appliances. With California's soaring cost of living and many consumers struggling to keep up, now is not the time to impose additional costs on consumers.

A better approach to reducing NOx emissions would be to impose ultra-low NOx emission standards to make natural gas appliances even more environmentally friendly at no additional cost to consumers.

Beyond the initial cost of the appliances, the amendments do not account for the substantial retrofit and infrastructure upgrade expenses that owners of older homes will have to bear to accommodate the new technology. These costs could amount to tens of thousands of dollars, placing an undue financial burden on homeowners, renters, and business owners, many of whom can least afford it.

Additionally, we are deeply concerned about the increased strain these rules will place on an already aging electrical grid. This grid not only relies on nonrenewable sources, such as natural gas, to generate power, but is also ill-equipped to handle excessive new demand, posing a significant public safety risk. Residents have already endured frequent blackouts and service interruptions, and since 2015, electric power lines have caused six of the 20 most devastating wildfires in our community. Furthermore, numerous residential and commercial projects are currently on hold due to a lack of available power.

Many Southern California families are already struggling with high living costs, and mandating costly retrofits or replacements will only exacerbate financial hardships. These rules disproportionately impact lower-income households, which are the least able to afford such expenses.

While we understand and support the Air District's efforts to improve air quality, the proposed amendments would impose an undue and significant burden on homeowners, renters, and small businesses.

Thank you for your time and consideration. We respectfully urge the Board to oppose Proposed Amended Rules 1111 and 1121 and explore alternative approaches that balance air quality improvements with economic feasibility for all residents.

Sincerely,

A handwritten signature in blue ink that reads 'Leah Skinner'.

President

Working Together for Growth and Prosperity
 530 E Del Amo Blvd., Carson, CA 90746 (310) 217-4590
www.CarsonChamber.com

COMMENT LETTER #7: PASADENA CHAMBER OF COMMERCE AND CIVIC ASSOCIATION

March 28, 2025

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

RE: PLEASE OPPOSE – Proposed Amended Rules 1111 and 1121 - February 28 Versions

Dear Chair Delgado and Governing Board Members,

The Board of Directors of the Pasadena Chamber of Commerce and Civic Association opposes the proposed Amended Rules PAR 1111 and PAR 1112.

Despite the changes to the rules we remain opposed. While we do appreciate the amendments, they are simply not enough for us to support or even remain neutral about Rules 1111 and 1121.

SCAQMD Amended Rules 1111 and 1121 force higher costs on consumers. When people are faced with increasing costs for everyday needs, imposing rules that would significantly increase costs for heaters seems almost punitive.

We all recognize the impacts climate change is having on Southern California. We also understand that we all need to amplify our efforts to reduce greenhouse gas emissions. But, we need to balance that with cost considerations and an understanding of the impacts to everyday people and their household economies.

Thank you for your service to Southern California. Your time and expertise is very much appreciated.

The Board of Directors of the Pasadena Chamber of Commerce and Civic Association respectfully urges the AQMD Board to explore different approaches that balance air quality improvements with economic reality facing residents.

Sincerely,

A handwritten signature in blue ink, appearing to read "Paul Little". The signature is fluid and cursive, with a long horizontal stroke at the end.

Paul Little
President and Chief Executive Officer

cc: Members of the AQMD Governing Board

44 North Mentor Avenue ■ Pasadena, California 91106-1745
626-795-3355 ph ■ 626-795-5603 fax ■ www.pasadena-chamber.org

COMMENT LETTER #8: ERIN PAK (KHEIR CLINIC)

March 21, 2025

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

Re: Proposed Amended Rule 1111 & Amended Rule 1121 - OPPOSE

Dear Members of the Stationary Source Committee,

On behalf of nearly 22,000 indigent residents of Los Angeles we serve at Kheir Clinic, we are writing to express our opposition to the Proposed Amended Rules 1111 and 1121. While we recognize that this legislation is regional in scope, the Proposed Rule Concept and Mitigation Fees will have a disproportionate impact on low-income and underserved communities. The rules appear to heavily favor zero-NOX equipment adoption, which often defaults to electric options, without fully accounting for infrastructure readiness, consumer preference, or the resulting financial burden. Kheir is a 501(c)(3) non-profit service agency, providing critical culturally and linguistically sensitive healthcare and social services to the uninsured and under-insured working poor of Los Angeles.

We believe our patients and residents of Southern California should retain the right to choose from a full range of safe, reliable, and affordable energy sources and appliances for their homes and businesses. We further believe there are more balanced and cost-effective strategies available to improve air quality and protect the environment without creating additional hardships for vulnerable communities.

Southern California faces unprecedented affordability challenges: the costs of housing, transportation, and energy continue to rise. Every day, we care for patients struggling with food insecurity, unemployment, and housing instability—all of which significantly impact their health outcomes and overall safety. It is unreasonable to expect that all households and small businesses will be able to bear the expense of switching to zero-NOX appliances—whether electric or otherwise—without encountering financial strain. For homeowners and landlords, these changes often come with additional costs, such as electric panel and wiring upgrades. For renters, these costs are typically passed on in the form of higher rents. Moreover, households that rely exclusively on electric appliances currently face energy bills averaging over \$1,100 more annually than those using mixed-fuel systems.

Additionally, past events such as the Camp Fire, Kincade Fire, Woolsey Fire, and Eaton Fire have demonstrated vulnerabilities in California's utility infrastructure, including safety lapses linked to electric utilities. Until our regional energy infrastructure can provide safe, comprehensive, and reliable service, it is premature to limit residents to primarily electric or zero-NOX alternatives. The proposed rules erode consumer choice and concentrate risk by eliminating energy diversity. In the event of power outages or service interruptions—whether due to natural disasters or utility failures—residents will face the dangerous prospect of being entirely without energy for critical needs such as cooking, heating, and hot water.

For these reasons, we respectfully oppose the Proposed Amended Rules 1111 and 1121.

Sincerely,

Erin Pak

CC: Supervisor Holly Mitchell, Committee Vice Chair

Kheir Clinic is committed to providing linguistically and culturally sensitive quality primary healthcare and human services support to the underserved and uninsured residents of Southern California.