



Orange County Council of Governments

Orange County Council of Governments (OCCOG)
3972 Barranca Parkway, Ste. J127
Irvine, CA 92606

info@occog.com



May 27, 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 publicly noticed on April 29

Dear Chair Delgado and Governing Board Members:

On behalf of the Orange County Council of Governments, a regional planning agency that brings together local jurisdictions across Orange County to collaborate on issues affecting the region. OCCOG focuses on long-range planning, transportation, housing, and sustainable development, ensuring that cities work together to address shared challenges and advocate for sound public policy. Through coordination with state and regional agencies, OCCOG supports smart growth and enhances the quality of life for all Orange County residents, we write to express our opposition to Proposed Amended Rules (PAR) 1111 and 1121. Our opposition is reflective of the revised language publicly noticed on April 29, 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 place higher costs on consumers and businesses. 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.



Orange County Council of Governments

Orange County Council of Governments (OCCOG)
3972 Barranca Parkway, Ste. J127
Irvine, CA 92606

info@occog.com

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,

John Gabbard
Chair

Marnie O'Brien Primmer
Executive Director

cc: SCAQMD Governing Board
OCCOG Board of Directors