

## Jennifer Vinh

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**From:** Becky Allen <Becky\_Allen@gbtpa.com>  
**Sent:** Monday, May 12, 2025 10:39 PM  
**To:** Jennifer Vinh  
**Subject:** [EXTERNAL] Rules 1111 and 1121

To Whom It May Concern:

I am writing to voice my concern about rules 1111 and 1121 that would require consumers and commercial businesses to purchase all electric appliances.

The costs to purchase all electric appliances will be much higher than natural gas appliances. Then there is the cost to convert and upgrade our panels and wiring to accommodate this change.

California is becoming unaffordable to many residents. This would just be another costly requirement many Californians can't afford.

California is also ill-equipped for this type of electric grid capacity. There will be even more outages and black outs.

It is also not necessary as there are solutions to make natural gas environmentally friendly. I understand there is a new technology available today. You can enforce ultra-low NOx emission standards on natural gas appliances. This will achieve clean air standards and not be a huge expense to consumers.

Please consider the costly burden this requirement would pose to already struggling California families when voting on this crucial decision in early June.

Please Vote No.

Thank you- Becky Allen

Becky Allen | Senior Resolution Manager | Gallagher Bassett.  
CA License Number 2G93555/Gallagher Bassett CA License Number 2731012  
**Reporting Branch:** Atlanta Liability (190) | **Office Location:** Duluth, GA  
**Mailing Address:** PO Box 2934, Clinton, IA 52733-2934  
D: 949-349-9605 | F: 949-588-8931  
E: [Becky\\_Allen@gbtpa.com](mailto:Becky_Allen@gbtpa.com)  
Alternate Point of Contact: **Mehdi Jacob Dafir**  
D: 949-349-9717  
E: [mehdi\\_dafir@gbtpa.com](mailto:mehdi_dafir@gbtpa.com)

Gallagher Bassett is committed to delivering exceptional service and we are here to help. Please contact my supervisor [Steven Kreick@gbtpa.com](mailto:Steven_Kreick@gbtpa.com) with any

questions.

Gallagher Bassett is committed to providing exceptional service. If you wish to share a compliment or comment about the service I have provided, please email [GB.ServiceExcellence@gbtpa.com](mailto:GB.ServiceExcellence@gbtpa.com).

**Jennifer Vinh**

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**From:** South Coast AQMD <[REDACTED]>  
**Sent:** Friday, May 9, 2025 12:14 PM  
**To:** Jennifer Vinh  
**Subject:** Contact Form

## Contact Form

**Name:** Chris Orem

**Email:** [REDACTED]

**Phone:** [REDACTED]

### Message:

I am writing to ask that the portion of this rule that will require homeowners to replace existing operational equipment be reconsidered. Determining the NOx emissions for the heating units in my home has been a challenge, but with that information if the policy is implemented as outlined in the Amended Rule, it will require me to replace my central furnace in 2028 and my pool heater (which we very seldom use) in 2030. The expense for these changes will easily exceed \$10,000 because we will also need to upgrade our electrical panel. This will be significant challenge for us on our fixed income. I understand and support replacing the units when they fail (trusting that the electrical grid will gradually catch up to the increases in demand), but requiring the replacement of a working unit with a more operationally

**expensive unit will impose a significant burden on us and many other Southern California residents. I would propose an alternative approach be considered, like possibly basing the replacement requirements on natural gas usage instead of an arbitrary date. Thank you for your consideration. Chris Orem, Grand Terrace CA**

## Jennifer Vinh

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**From:** Liz Allen <[REDACTED]>  
**Sent:** Saturday, May 10, 2025 10:11 PM  
**To:** Jennifer Vinh  
**Subject:** [EXTERNAL] Rules 1111 and 1121

To Whom It May Concern:

I am writing to voice my concern about rules 1111 and 1121 that would require consumers and commercial businesses to purchase all electric appliances.

The costs to purchase all electric appliances will be much higher than natural gas appliances. Then there is the cost to convert and upgrade our panels and wiring to accommodate this change.

California is becoming unaffordable to many residents. This would just be another costly requirement many Californians can't afford.

California is also ill-equipped for this type of electric grid capacity. There will be even more outages and black outs.

It is also not necessary as there are solutions to make natural gas environmentally friendly. I understand there is a new technology available today. You can enforce ultra-low NOx emission standards on natural gas appliances. This will achieve clean air standards and not be a huge expense to consumers.

Please consider the costly burden this requirement would pose to already struggling California families when voting on this crucial decision in early June.

Please Vote No.

Thank you.

Elisabeth Allen

## Jennifer Vinh

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**From:** Homero Sandoval <[REDACTED]>  
**Sent:** Friday, May 9, 2025 8:23 PM  
**To:** Jennifer Vinh  
**Subject:** [EXTERNAL] URGENT: Please Oppose Rules 1111 and 1121

Dear Jennifer Vinh,

Today, I write as a resident in strong opposition to Proposed Amended Rules 1111 and 1121, publicly noticed on April 29, 2025. I will be severely impacted if these rules are passed. These rules directly affect the general public, not just large facilities or industries, but everyday homeowners and renters, like me.

Under the newly amended proposed rules, similar to the older rules, the consumer will be left with a higher price tag, and in this case, renters and homeowners will bear the brunt of the manufacturer's fee at the end of the day. The "revised" language introduced in February does not address my concern for the proposed amended rules that will force higher costs onto residents like me. 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.

With these amended rules, SCAQMD adds 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!

Additionally, upgrading buildings with new electric appliances and wiring is a costly expense. Electrical system upgrades are required, which I understand costs in excess of \$40,000. 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.

Finally, 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.

Thank you for your time and consideration.

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

Sincerely,  
Homero Sandoval

[REDACTED]  
Ontario, CA 91761  
[REDACTED]

## Jennifer Vinh

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**From:** Izzy Zamora <[REDACTED]>  
**Sent:** Tuesday, May 13, 2025 3:56 PM  
**To:** Jennifer Vinh  
**Subject:** [EXTERNAL] Rules 1111 and 1121

As a Irvine resident, we should not have to be told by groups that electricity or gas energy is a choice. We as Americans make our decisions. We choose to stay with our gas appliances and have that right.

Sent from my iPhone

## Jennifer Vinh

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**From:** Juergen [REDACTED] >  
**Sent:** Monday, May 12, 2025 1:42 PM  
**To:** Jennifer Vinh  
**Subject:** [EXTERNAL] Rules 1111 and 1121

To AQMD

I wish to voice my opposition to the proposed rules for eliminating gas water heaters and furnaces. I believe the cost of the transition will be excessive. My electrical panel does not have the 4 spaces to allow for the required 220V service required for the additional two appliances. This and the mandate for EV vehicles requires a total of 6 spaces.

While the fixtures are reasonably cost effective to purchase, the cost of providing the necessary electrical upgrades and continued added expense of operation over gas is an unreasonable hardship. Multiply this by millions of homes in the 4 county area.

Given that the state is no where near providing sufficient renewable electricity to satisfy needs on any given day, this added load to the system will cause more brownouts and challenges in maintaining the integrity of the grid. This state is already excessively expensive to live in and this only adds to the problem with very little environmental gain. Not to mention, more electricity will be required to be generated by gas turbines.

It would make more sense to require this for new homes where the required utilities can be planned up front.

Respectfully,

Juergen Milczewsky  
[REDACTED]  
Brea, CA 92823



## Jennifer Vinh

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**From:** Mary Schmidt <[REDACTED]>  
**Sent:** Sunday, May 11, 2025 11:59 AM  
**To:** Jennifer Vinh  
**Subject:** [EXTERNAL] URGENT: Please Oppose Rules 1111 and 1121

Dear Jennifer Vinh,

Today, I write as a resident in strong opposition to Proposed Amended Rules 1111 and 1121, publicly noticed on April 29, 2025. I will be severely impacted if these rules are passed. These rules directly affect the general public, not just large facilities or industries, but everyday homeowners and renters, like me.

Under the newly amended proposed rules, similar to the older rules, the consumer will be left with a higher price tag, and in this case, renters and homeowners will bear the brunt of the manufacturer's fee at the end of the day. The "revised" language introduced in February does not address my concern for the proposed amended rules that will force higher costs onto residents like me. 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.

With these amended rules, SCAQMD adds 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!

Additionally, upgrading buildings with new electric appliances and wiring is a costly expense. Electrical system upgrades are required, which I understand costs in excess of \$40,000. 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.

Finally, 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.

Thank you for your time and consideration.

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

Sincerely,  
Mary Schmidt

[REDACTED]  
Laguna Beach, CA 92651  
[REDACTED]

## Jennifer Vinh

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**From:** Matt Yeager <[REDACTED]>  
**Sent:** Friday, May 9, 2025 12:23 PM  
**To:** Jennifer Vinh  
**Subject:** [EXTERNAL] Oppose Proposed Amended Rules 1111 and 1121

Hello,

I am a resident of unincorporated San Bernadino County within City of San Bernardino.

I respectfully request that the SCAQMD Board not adopt the subject Proposed Amended Rules 1111 and 1121.

We purchased our home in 2002. The residential tracts in this area (known as Del Rosa) were built in the 1950s (our house built in 1956). These houses were built with electrical service that has very low capacity compared to newer developments. They were designed to use natural gas as the main power for furnaces, water heaters, clothes dryers and stoves, and originally only swamp coolers for cooling. These houses were built without insulation in the walls or under floors with only a thin layer of insulation in the attic. About 2 years ago I sought to upgrade the electrical service panel to provide the ability to connect a generator or eventually solar panels. The cost at that time was estimated by a reputable contractor to be about \$50,000, in part due to SCE requirements for location of the panel. The electric heating and appliances demanded by the subject rules would require this work for my house, and all of those appliances would need to be replaced. I don't have a firm cost estimate, but this conversion would certainly require about \$100,000 to accomplish.

I am 65 and have a good job with the County of Riverside so we can afford our current bills, although with some SCE bills now exceeding \$700 or even \$800 per month we have to manage our costs. In early 2024 our insurance company required us to replace the roof on the house at a cost of \$40,000, which we will be about 10 years paying off.

My wife has a chronic autoimmune illness and does not work so my salary carries most of our budget. Because of her health concerns we have additional expenses and require heating and cooling for the house. It's also likely that I will retire within about one year. Pulling together the finances required to comply with the proposed rules would be a great negative impact on our lives and might even lead us to sell the house rather than refinance to obtain these funds.

We support efforts to improve air quality in southern California. However, this kind of regional retrofit program is too expensive to consider without a more thoughtful implementation approach and extended timeline. Entire neighborhoods in similar situations will need retrofits and most residents have very modest incomes. This will also create a demand for contractors to do this work and reliable contractors are already difficult to find.

We urge the SCAQMD Board not to adopt Rules 1111 and 1121 at this time.

Sincerely,

Matt A. Yeager, D.Env  
[REDACTED]  
San Bernardino, CA 92404  
[REDACTED]

**Jennifer Vinh**

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**From:** South Coast AQMD <[REDACTED]>  
**Sent:** Sunday, May 11, 2025 7:59 AM  
**To:** Jennifer Vinh  
**Subject:** Contact Form

## Contact Form

**Name:** Michael Haro

**Email:** [REDACTED]

**Phone:** [REDACTED]

### Message:

**I oppose these rule changes. Net costs outweigh net benefits to society.**



FROM THE DESK OF

**AM PROPERTY MANAGEMENT INC**

P.O. BOX 131

SEAL BEACH, CA 90740

1-562-356-7200

SMCCARTHY@AMERICANPROPMGT.COM

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May 10, 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 AM Property Management Inc., a property management company, 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.



FROM THE DESK OF

**AM PROPERTY MANAGEMENT INC**

P.O. BOX 131

SEAL BEACH, CA 90740

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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,



FROM THE DESK OF

**AM PROPERTY MANAGEMENT INC**

P.O. BOX 131

SEAL BEACH, CA 90740

1-562-356-7200

SMCCARTHY@AMERICANPROPMGT.COM

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**Jennifer Vinh**

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**From:** South Coast AQMD <[REDACTED]>  
**Sent:** Saturday, May 10, 2025 1:31 PM  
**To:** Jennifer Vinh  
**Subject:** Contact Form

## Contact Form

**Name:** Terry Cobb

**Email:** [REDACTED]

**Phone:** [REDACTED]

### Message:

**NO!!!! The infrastructure can't handle the current electrical load and it will drive costs up for retirees (me), middle and lower classes. This amendment will drive more people out of California.**