



March 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 released February 28

Dear Chair Delgado and Governing Board Members:

On behalf of Associated Builders and Contractors of Southern California, where we ensure fair marketplaces, advance industry education, enhance contractor professionalism, promote safety, and uphold free enterprise, we write to express our opposition to the proposed amendments to Rules 1111 and 1121.

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 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 explore alternative approaches that balance air quality improvements with economic feasibility for all residents.

Sincerely,

Russell Johnson
Director of Government Affairs

cc: Members of the Governing Board