



January 16, 2025

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

Subject: Opposition to Proposed Amended Rules 1111 and 1121

Dear Members of the South Coast Air Quality Management District (SCAQMD),

The City of Colton has a strong opposition to the proposed amendments to Rules 1111 and 1121, which seek to regulate air emissions from natural gas-powered central furnaces and water heaters in the South Coast Air Quality Management District's (SCAQMD) service area. While we understand and support the SCAQMD's commitment to improving air quality, these rules, if implemented, will impose significant financial burdens on Colton's residents, homeowners, renters, and local businesses, with little measurable benefit to air quality.

These proposed amendments would impact an estimated 17 million people across the four-county SCAQMD service area, including many in our community. Rule 1111 would regulate emissions from gas-powered central furnaces, and Rule 1121 would regulate residential natural gas-powered water heaters. The rules would phase out the use of natural gas-powered units in new construction starting in 2026, with a full phase-out in existing buildings scheduled for 2027. This transition is expected to impose significant costs on homeowners, apartment owners, and businesses.

The City of Colton is committed to addressing affordable housing needs, a priority that continues to grow as local governments face increasing pressure to build more housing, particularly affordable housing. The retrofitting and replacement requirements under these rules will only increase the costs associated with homeownership, rental properties, and small businesses, putting an additional strain on an already struggling community. Housing affordability is a critical issue in our region, and we must ensure that any regulations affecting housing costs provide measurable benefits to offset these increases.

Unlike many SCAQMD rules that regulate large industrial sources of air pollution, such as oil refineries and warehouses, Rules 1111 and 1121 would directly affect individual homeowners, apartment building owners, and small businesses. Property owners will be forced to shoulder the costs of expensive retrofits to meet the new standards, including electrical panel upgrades, new plumbing, and the installation of electric units, which can cost thousands of dollars per property. These additional costs will likely be passed down to renters in the form of rent increases, which will exacerbate the financial pressures on Colton's low- and moderate-income households.

MAYOR

Frank J. Navarro

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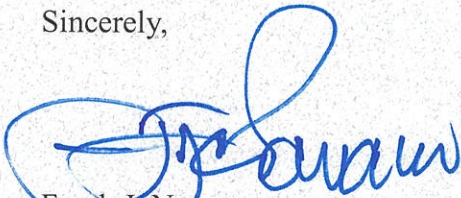
Additionally, the transition to electric water heaters and furnaces will significantly increase demand for the already stressed electrical grid. Given that our region has experienced power shortages in recent years, it is concerning that the increased demand from millions of new electric appliances could lead to power brownouts or outages. This could have a particularly detrimental impact on our community, where reliable access to power is essential for daily living, business operations, and public safety.

In summary, while we understand the importance of improving air quality, the proposed rules would result in substantial costs for the residents and businesses in Colton and throughout the SCAQMD service area. The rules would provide limited air quality benefits and could further strain housing affordability and energy infrastructure.

For these reasons, the City of Colton opposes the proposed amendments to Rules 1111 and 1121. We urge the SCAQMD to reconsider these rules and delay or cease their consideration until the full financial, economic, and infrastructure impacts can be thoroughly evaluated.

Thank you for your attention to this critical matter. We look forward to your thoughtful consideration of our concerns.

Sincerely,



Frank J. Navarro
Mayor

Cc: Ray Marquez, Board President San Bernardino Council of Governments
Bill Smith, City Manager City of Colton