

Jeff Wood  
Council Member

Steve Croft  
Council Member



Todd Rogers  
Mayor

February 26, 2025

Members of the Governing Board  
South Coast Air Quality Management District (SCAQMD)  
21865 Copley Drive  
Diamond Bar CA 91765

Dear South Coast Air Quality Management District Governing Board Members:

On behalf of the City of Lakewood, we write to express our opposition to Proposed Amended Rules 1111 and 1121, which would establish zero emission limits for residential and commercial space heating and residential water heating. While we commend the South Coast Air Quality Management District for its commitment to improving air quality in our region, we have serious concerns about the impacts of these proposed amendments on our community.

Unlike most SCAQMD rules that regulate large stationary sources of air pollution like oil refineries and warehouses, Rules 1111 and 1121 specifically target individual homeowners, apartment buildings, and businesses, meaning families and business owners will directly bear the cost of these rules.

The estimated replacement costs of \$18,500 to \$21,500 for furnaces and \$5,200 to \$8,200 for water heaters present a significant financial burden. Many residents and small businesses are already under financial strain and struggling to meet the rising costs of essentials. Notwithstanding, SCAQMD's proposed Go Zero Incentive Program and other available incentive programs, many of which have eligibility requirements and/or subject to funding availability, the issue of affordability persists. Simply put, the feasibility of transitioning to zero-emission appliances is not compatible with the financial realities of families and small businesses.

Additionally, retrofitting and replacement requirements under these rules will only increase the costs associated with homeownership, rental properties and small businesses. These additional costs will likely be passed down to tenants in the form of rent increases, placing additional pressure on renters.

Furthermore, we have serious concerns about the electric grid capacity. Energy demand has increased exponentially, in large part due to electrification and the rise of energy-intensive technologies. Our power grid has not proven capable of consistently meeting the demand, and power outages and brownouts are increasing in frequency and severity. Outages pose a serious threat to health and safety, jeopardizing delivery of front-line services and increasing the risk of negative health outcomes for vulnerable populations. The transition to electric furnaces and water heaters will impose a significant increase on an overburdened grid, increasing the likelihood of negative impacts on the Lakewood community.

For these reasons, the City of Lakewood is opposed to Proposed Amended Rules 1111 and 1121.

Sincerely,

A handwritten signature in blue ink, appearing to read "Todd Rogers", is written over a faint blue line.

Todd Rogers  
Mayor

# Lakewood