

January 9, 2025

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

Dear SCAQMD Board Members,

I am writing as a resident of Ladera Ranch and a small business owner in San Juan Capistrano to express my strong opposition to the proposed amendments to Rules 1111 and 1121, which would require homeowners, landlords, and businesses to replace gas furnaces and water heaters with expensive “zero-emission” electrical units.

While I support efforts to improve regional air quality, these proposals impose significant financial burdens on residents and small business owners, with minimal environmental benefits. According to an editorial published on December 27, 2024 in the Orange County Register, the projected cost of implementing these rules across the SCAQMD service area is at least \$20.4 billion. For many, the upfront costs of upgrading to electric units—potentially tens of thousands of dollars per household or business—are simply unaffordable.

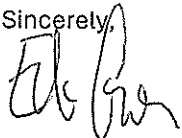
The editorial also highlighted a serious flaw: California’s electric grid is already under strain, with frequent power outages and reliability issues. Replacing natural gas appliances with electric alternatives will increase demand, potentially worsening grid instability. Forcing residents and businesses to rely solely on electricity without addressing infrastructure vulnerabilities is shortsighted and risks even more frequent brownouts and service disruptions.

Furthermore, these rules will exacerbate the region’s housing crisis. As Donald Wagner, Chairman of the Orange County Board of Supervisors and a member of the SCAQMD Board, noted, landlords will pass compliance costs to tenants, making rents less affordable. The expense of retrofitting older buildings will discourage the development of affordable housing and further reduce homeownership opportunities.

The marginal air quality improvements these rules might achieve come at an exorbitant cost, disproportionately affecting middle- and lower-income families and small business owners. I urge the SCAQMD to consider alternative approaches, such as incentivizing cleaner technologies, which would allow for a gradual transition while preserving affordability and reliability.

Thank you for your time and consideration. I trust that the Board will act in the best interests of all residents and businesses within the district.

Sincerely,



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