



February 21, 2025

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

Subject: Concerns Regarding Proposed Rules 1111 and 1121

Dear Chair Delgado and the Board of Directors,

On behalf of Clay Lacy Aviation, I am writing to express serious concerns regarding the proposed **South Coast AQMD Rules 1111 and 1121**, which would mandate zero-emission appliances for residential and commercial heating. These regulations would have far-reaching impacts on our community, and we urge further evaluation before proceeding with implementation.

Our primary concerns are as follows:

1. **Lack of Public Awareness & Outreach** – Many homeowners, businesses, and property managers who will be directly affected remain unaware of these proposed changes and their financial implications. More extensive public outreach is essential before finalizing these rules.
2. **Infrastructure Readiness & Energy Demand** – The proposed regulations assume widespread electrification, but it remains unclear whether California's electrical grid can support this increased demand without risking reliability issues, service interruptions, or higher utility costs.
3. **Financial Impact on Residents & Businesses** – Without a comprehensive cost analysis and guaranteed funding for rebates and incentives, this mandate could impose a significant financial burden on homeowners and multifamily property owners—particularly those already struggling with housing affordability.

Additionally, these regulations would specifically impact our constituents by our organization who is currently redeveloping two major sites in Southern California where we are dealing with post-COVID supply chain disruptions and cost increases, combined with the impact of record inflation on the cost of materials and labor for construction. Not to mention, in our Van Nuys location, we are already maxed out on the amount of power LADWP can provide to our site.

Given these challenges, we respectfully request that the Committee:

- **Delay implementation until at least 2029** to allow for proper infrastructure planning and public education.



- **Secure firm commitments for financial assistance** such as rebates and incentives before enforcement begins.
- **Conduct additional public outreach** to ensure that all affected residents and businesses fully understand the implications of these regulations.
- **Release updated rule language** with sufficient review time for stakeholders before moving forward.

The City of [City Name] supports responsible environmental policies that improve air quality while ensuring that regulations are practical, cost-effective, and do not disproportionately burden our residents and businesses. We urge South Coast AQMD to consider these recommendations and look forward to working together to achieve our shared sustainability goals.

Sincerely,

A handwritten signature in blue ink that reads "Scott C. Cutshall". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Scott Cutshall
President, Real Estate & Sustainability
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