

Faye Thomas

From: S Barryte [REDACTED] >
Sent: Wednesday, January 1, 2025 11:32 PM
To: Clerk of Board; COB
Cc: Marisela Santana; Uduak-Joe Ntuk (Sol)
Subject: [EXTERNAL] Amendments to Rules 1111 and 1121 (objections)

South Coast Air Quality Management District,

I object to incorporating the amendments to Rules 1111 and 1121.

I am a California homeowner. These proposed amendments are expensive since major electrical upgrades including additional wiring are necessary to install an electric water heater to replace a gas heater. Upgrades and wiring may also be necessary for replacing gas-powered home heaters. The delays for the required infrastructure permits and upgrades will cause an extended outage and added hardship. (For people with some medical conditions, an extended lack of heating could be deadly. Lack of hot water is a sanitation concern.) Homeowners on a fixed income, especially retired people, almost certainly will be unable to replace a broken house or water heater without going into debt.

In the recent past California has sometimes failed to meet the state's need for electricity. More electricity will be needed to charge all the EVs that are being purchased further straining the electricity supply. Until the electric grid has greater capacity and more "reserve", removing fossil fuels as an option for heating is a bad plan that reduces electric grid reliability by increasing electricity demand.

Making these amendments apply only to new construction will increase the already high cost of California housing (both rental and home purchase) and exacerbate the state's current unhoused population problem.

-Steven Barryte

Faye Thomas

From: Clerk of Board
Sent: Tuesday, December 31, 2024 5:54 PM
To: Faye Thomas
Subject: FW: [EXTERNAL] Air District Plan Will Cost You, OC Register, 12-29-24

From: Miguel Prietto, MD [REDACTED] >
Sent: Tuesday, December 31, 2024 4:42 PM
To: Clerk of Board <ClerkOfBoard@aqmd.gov>
Cc: Donald.Wagner@ocgov.com; opinion@scng.com
Subject: [EXTERNAL] Air District Plan Will Cost You, OC Register, 12-29-24

Fellow South Coast Residents,

I expect that all of you who are planning these changes are studying the situation of carbon footprint in depth. If I had to make a decision on your plans, I would need to know and understand the following and not limited to the following:

What percentage of the South Coast carbon footprint does the household use of natural gas support? How much will your plan affect that percentage?

Where is this contribution of carbon footprint by household natural gas use on the list of carbon footprint contributors by percentage?

How does this compare to yearly wildfire contribution?

Of the 1,153,540 (July 2023 census) OC households, how many are affected?

How many of these households have a gas stove, gas water heater, gas house heater, and gas water heater? Of these homes how many have an electrical panel already that could handle converting their appliances to electric appliances?

What is the cost to replace these four gas appliances to electric appliances and upgrade the house electrical panel?

Would it cost \$15,000 - \$20,000 per affected household?

What about apartment owners, what is their cost? Can their cash flow support that?

What would be the necessary increased electricity needs for the electric replacement appliances? Has that study been done? What is the cost to build such facilities? How long would it take to realistically build such facilities? Where would they be built? Is the land already available? Where would the money to build these facilities come from?

I would be interested in the answers to these questions.

I would also be happy if I knew that you had all these 'detailed' and 'in depth' answers already; and that these questions and answers have been part of your decision making process.

What will all this cost? What is the cost to the public in general, and then specifically to each individual household?

Miguel Prietto

Faye Thomas

From: Clerk of Board
Sent: Tuesday, December 31, 2024 5:54 PM
To: Faye Thomas
Subject: FW: [EXTERNAL] Proposed Amended Rules 1111 and 1121

From: [REDACTED] >
Sent: Tuesday, December 31, 2024 4:54 PM
To: Clerk of Board <ClerkOfBoard@aqmd.gov>
Subject: [EXTERNAL] Proposed Amended Rules 1111 and 1121

These two proposals only recently came to my attention and I wish to voice my opposition. I'm on a fixed income and there is no way I would be able to afford a water heater or furnace replacement under these rules. While the goal of air quality is laudable, there has to be some common sense injected into your decision-making. These two measures will achieve minimal air quality improvements. Please vote "No" on Rules 1111 and 1121.

Ann Bilan
[REDACTED]
Lakewood, CA 90713

Faye Thomas

From: Clerk of Board
Sent: Tuesday, December 31, 2024 6:33 PM
To: Faye Thomas
Subject: FW: [EXTERNAL] mandated elimination of gas appliances.

From: mark dickson [REDACTED] >
Sent: Tuesday, December 31, 2024 6:30 PM
To: Clerk of Board <ClerkOfBoard@aqmd.gov>
Subject: [EXTERNAL] mandated elimination of gas appliances.

<https://www.ocreger.com/2024/12/27/the-governments-new-furnace-and-water-heater-rules-are-coming-for-you/>

Hi Board,

Saw this article with dismay. Me and my wife are retired. We have a gas stove, a gas furnace, and a gas hot water heater. The water heater is obviously the appliance most often needing replacement. The new regulations are going to mandate we switch to electric.

As you know, the cost of electricity is going up and up and up and up with no end in sight. We CAN NOT afford to switch to electricity for our appliances, the cost to switch and install new electricity connections, increased electricity costs will be too much on our now fixed income.

Supposedly the state or whoever, is supposed to consider economic hardship when imposing new rules. There is absolutely no way we can afford to start paying more and more for electricity.

You are essentially starting the financial landslide to drive us from our home and begin to look elsewhere where to live.

We can not afford to install solar, with batteries, the current infrastructure in our home requires converting our transformer from a 100 amp to a 200 amp service. Who will pay for this? You are essentially bankrupting many elderly people in the state. Where will the money come from?

Please DO NOT impose this new mandate. What do you want us to do? We can NOT afford the upgrades.

Mark Dickson
[REDACTED]

Faye Thomas

From: Shelley Scott [REDACTED] >
Sent: Friday, January 3, 2025 5:11 PM
To: COB
Subject: [EXTERNAL] Rules 1111 and 1121

I am contacting you to express my opposition to the proposed rules 1111 and 1121 requiring the replacement of gas hot water heaters and furnaces with electric after 2027 in new construction or when repair is needed.

These are only feasible if you are intending to bear the full cost of it and that still leaves the user with much higher energy costs every month.

California already has a high cost of living and high electric prices with strained capacity at times. Until these are addressed to be affordable, electric appliances are a costly burden to the average citizen.

I live in a trailer park on a fixed income. Replacing the hot water heater or heater with electric would likely leave me with the choice to do without either entirely. My 1967 trailer is difficult already to fit appliances into. Also my park management has a moratorium on any new electrical load until the 1947 system is replaced. That I have no control over.

The proposed rules would increase poverty and homelessness at this time.

Shelley Scott

[REDACTED]
Bellflower CA 90706

From: Shelley Scott <[REDACTED]>
Sent: Tuesday, January 7, 2025 8:19 PM
To: COB <cob@aqmd.gov>
Subject: [EXTERNAL] Regarding rules 1111 and 1121

Regarding my earlier email about rules 1111 and 1121 which stated that they would increase poverty and homelessness unless electricity rates came down to the national norm.

Sent: Tuesday, January 07, 2025 at 8:13 PM
From: "shelley scott" <[REDACTED]>
To: "shelley scott" <[REDACTED]>
Subject: Fw: hey- it was finally noticed!

----- Forwarded Message -----

Soaring electricity bills could hobble California's green energy push, state report says

Utility companies in the state charge more for electricity than the national average



PG&E subcontractor crews install a new utility post in Oakland, December 2024.

(Ray Chavez/Bay Area News Group)



By **GEORGE AVALOS** | gavalos@bayareanewsgroup.com | Bay Area News Group
UPDATED: January 7, 2025 at 2:26 PM PST

Soaring monthly electricity bills charged by California utility companies siblings could hobble the state's quest for a green energy Holy Grail, a new report shows.

Southern California Edison, San Diego Gas & Electric and PG&E levy charges for monthly bills that are far higher than the national average, making California electricity rates the second highest in the United States, [the state Legislative Analyst's Office reported](#) on Tuesday.

The Legislative Analyst's Office reported California's electricity rates are among the highest in the U.S., with residential electricity rates nearly double those across the nation.

The increase in electricity bills even tops the overall inflation rate.

UTILITY HEALTH CHECK: [Will California's power grid keep running smoothly?](#)

"Average residential electricity rates in California have grown faster than inflation in recent years, rising by about 47% over the four-year period from 2019 through 2023 compared to overall growth in prices of about 18%," according to the Legislative Analyst, a nonpartisan group that provides the state Legislature with advice and information.

From 2019 through 2023, monthly electricity rates for residential customers increased an average 67% for Southern California Edison, 48% for PG&E, and 57% for San Diego Gas & Electric, according to the report prepared by Helen Kerstein, an analyst in the office's environment and transportation unit.

The report determined that multiple factors appear to have fueled the jaw-dropping surge in electricity costs in California.

Among the key influences:

- significant and increasing wildfire-related costs.
- the state's ambitious greenhouse gas reduction programs and policies.
- differences in utility operational structures and services territories.

"High and increasing electricity rates add cost burdens to ratepayers across the state," the

■ PRESS-TELEGRAM

Soaring electricity bills could hobble...



Only Hawaii has higher electricity rates than California, the report determined.

California is also in danger of creating an energy catch-22 whereby the push to go green could hobble the state's clean power efforts.

"High electricity rates impede the state's efforts to meet its ambitious climate goals by discouraging households from pursuing electrification through switching out their fossil fuel-powered cars and appliances," the report stated.

The Legislative Analyst's Office warned that the significant increases in electricity rates may continue to burden customers.

"These trends currently are on track to continue," the nonpartisan office stated in its report.

RECOMMENDED FOR YOU

- 1 150 acres of Los Cerritos Wetlands on path to restoration after land swap deal finalized
- 2 Homes burning as 2,920-acre wildfire spreads in Pacific Palisades amid strong windstorm
- 3 Remembering KNAC, the pure rock heavy metal radio station of the '80s and '90s
- 4 Woman, 78, dies after Long Beach hit and-run; police seek help finding driver
- 5 Sharifa Batts succeeds Naomi Rainey Pierson as president of NAACP's Long Beach branch
- 6 Man's body washes ashore in Hermosa Beach
- 7 Bishop Montgomery boys basketball loses to St. Anthony in Del Rey League
- 8 Gavin Newsom is gaslighting Californians about homelessness and gas prices
- 9 Why falling mortgage rates can signal bad news
- 10 Mike Rinder, Scientology spokesman turned whistleblower, dies at 69
- 11 Here's where the Santa Ana wildfire threat will be highest this week
- 12 'Particularly dangerous situation' reflag warnings issued for Santa Ana windstorm in Southern California

TRENDING NATIONALLY

- 1 Homes burning, 30K under evacuation orders as windstorm fuels wildfire in Southern California
- 2 2 bodies found in landing gear of JetBlue airplane in Fort Lauderdale
- 3 Stimulus update: IRS to send out \$2.4 billion in outstanding checks from 2021
- 4 'We're probably in peak virus season' Experts seeing spike in illnesses.
- 5 Jimmy Carter federal holiday: What's open, what's closed Jan. 9 for National Day of Mourning

Faye Thomas

From: Kevin Jeffries [REDACTED] >
Sent: Monday, January 6, 2025 12:02 PM
To: COB
Cc: Daniel Penoyer; Jennifer Vinh
Subject: [EXTERNAL] Re: PAR 1111 & 1121 Public Comment

Please forward this to the commission ASAP (as corrected).

To: SCAQMD Governing Board Members c/o Clerk of the Board

Re: PAR 1111 & 1121

Please accept this letter of **Extreme Concern** related to the proposed regulations on furnaces and water heaters.

SCAQMD should be focused on **fully incentivizing property owners to make the very expensive voluntary conversions** - NOT forcing the changes that will be cost prohibitive to many, likely displace occupants, and in some cases violate lease agreements.

Concerns include:

1. The conversation to electric appliances (water heater and/or furnaces) will in fact cause significant financial hardship to many. Most homes do **NOT** have the 220V or high amperage 110V electrical infrastructure (wiring) in the vicinity of current gas powered water heaters or furnaces. Furthermore older homes may **NOT** even have the electrical capacity at the power meter to supply the needed new capacity (thereby requiring a complete and expensive full electrical meter panel or sub-panel replacement).
2. In nearly all cases **SIGNIFICANT** electrical wire routing construction work will need to be completed by a licensed electrical contractor. This will require local government permits, inspections, and in some cases the likelihood of submitting proposed electrical plans in advance of the work. These requirements will often result in occupants having **NO** heat or **NO** hot water while waiting for plans to be approved, permits to be approved, and construction efforts to be completed, inspected and signed-off. Will SCAQMD indemnify the property owner when a tenant has no service? Will SCAQMD provide hotel/motel housing during a multi-week delay?

I cannot overstate how extremely difficult it will be in many cases to find an acceptable construction path to route new electrical wiring from the main power meter or sub-panel to a formally gas appliance location that has NO pre-existing electrical capacity in the immediate vicinity. Such an undertaking could easily result in thousands of dollars being spent just for an electrical line to one appliance.

3. Additionally if a gas powered water heater is being eliminated - will the pre-existing exhaust vent system that exits through the roof need to be eliminated as well? Will this


require a roofing contractor to remove the extension through the roof and to re-seal the roof? Again - more significant costs, permits and delays.

4. In the 4th largest County in California (Riverside County), the power grid is NOT reliable. Power shut-offs occur on a regular basis because of wind, fire threats and rolling brown-outs because of inadequate grid infrastructure. Requiring a forced conversion to an unreliable utility provider will only cause unnecessary personal hardships with the routine loss of heat or hot-water for occupants.

5. Many lease agreements spell out that the property owner will furnish certain Natural Gas appliances to the occupants. Will SCAQMD indemnify the property owner when forced by SCAQMD to violate this provision?

I appreciate the commission taking the time to consider these many hardship factors, costs and delays. **Please do NOT proceed with the heavy-handed approach as proposed.**

Respectfully,

Kevin Jeffries
Ret. State Assemblymen
Ret. County Supervisor
Homeowner

Lake Elsinore, CA 92530

Faye Thomas

From: WALTER MIRCZAK [REDACTED] >
Sent: Saturday, January 4, 2025 10:04 PM
To: COB
Subject: [EXTERNAL] Comments on Proposed Amended Rule 1111 – Reduction of NOx Emissions from Natural Gas-Fired Furnaces (PAR 1111) and Proposed Amended Rule 1121 – Reduction of NOx Emissions from Small Natural Gas-Fired Water Heaters (PAR 1121).

Proposed Amended Rules 1111 and 1121 are far-reaching in scope and expense but will do little to clean the air. If implemented, these rules will impose ruinous expenses on already stretched residents and businesses, potentially cause people to lose housing, and strain an already stretched electricity grid.

As proposed under Rule 1121, any water heater that breaks after Jan. 1, 2027, must be replaced with an electric model. The electric models are considerably more expensive, and will require expensive home or business electrical upgrades, along with lengthy permit wait times. Rule 1111 concerns natural gas furnaces — a furnace that fails in 2028 or beyond, must be replaced with electric technology. The cost to implement these rules will be tens of thousands of dollars per unit for every homeowner, landlord and business forced to make these purchases. All homeowners, landlords and businesses will eventually be burdened with this cost. The overall cost to implement the rules is at least \$20.4 billion throughout the entire district “service” area. These rules will contribute to making life in Southern California even more unaffordable.

For new construction, these rules would take effect in 2026, further elevating construction costs and housing prices, putting homeownership even more out of reach for many Southern Californians. Making new construction more expensive runs counter to goals of building more housing and reducing homelessness.

As zero-emission water heaters and furnaces replace natural gas models a substantial increase in electricity usage will result. California’s electric grid is already stressed . With millions of new electric devices pulling power from the grid, we risk even more frequent brownouts, outages, and wildfires.

The elimination of natural gas water heaters and furnaces promises minuscule regional air quality benefits while imposing significant consumer pain and taxing an already overextended electricity grid. I do not believe these rules accomplish better air quality at anything close to a reasonable cost. I urge that they be rejected.

Walter Mirczak
[REDACTED]
Laguna Niguel