



City of Glendora  
116 E. Foothill Blvd.  
Glendora, CA 91741

December 18, 2024

South Coast Air Quality Management District  
Attn: Stationary Source Committee  
21865 Copley Drive  
Diamond Bar, CA 91765

**SUBJECT:        OPPOSITION TO PROPOSED AMENDED RULES 1111 AND 1121**

Dear Members of the Stationary Source Committee,

On behalf of the City of Glendora, we write to express our opposition to Proposed Amended Rules (PARs) 1111 and 1121, which would establish zero-NOx emissions limits for residential and commercial space heating and residential water heating. While we commend the South Coast Air Quality Management District (SCAQMD) for its commitment to improving air quality in our region, these proposed amendments present significant concerns for our community, including economic hardships, technological feasibility challenges, environmental trade-offs, and a lack of adequate public engagement.

The proposed rules will impose substantial financial burdens on Glendora residents and businesses. Transitioning to electric heat pump technologies—currently the only available zero-NOx option—requires costly appliance replacements, electric panel upgrades, and infrastructure adjustments. Estimates indicate that replacing a natural gas water heater (\$1,700) with a heat pump water heater could cost up to \$80,000 in some cases, depending on necessary upgrades. Similarly, replacing space heating systems ranges from \$27,099 to \$32,099 for homes requiring panel upgrades. These costs will disproportionately affect low-income households, renters, and small businesses that are least able to absorb such expenses.

The readiness of electric heat pump technology and supporting infrastructure remains a significant barrier. Many homes in Glendora, particularly older ones, lack the electrical capacity to accommodate these appliances without expensive upgrades. Furthermore, the efficiency rates assumed in the SCAQMD's cost analyses exceed what is achievable with currently available technology. The reliance on overly optimistic assumptions undermines the feasibility and fairness of these proposed rules.

While we support efforts to reduce NOx emissions, the projected benefits of these rules must be weighed against their costs. The proposed amendments would reduce NOx emissions by only 2.8% in the South Coast Air Basin, while shifting energy demand to the electrical grid, which may still rely on fossil fuel generation. This approach risks undermining the environmental gains by increasing greenhouse gas emissions elsewhere in the energy supply chain. Additionally, the significant upfront costs may delay broader adoption of clean technologies, impeding long-term progress.





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The City of Glendora is deeply concerned about the limited public awareness and engagement surrounding these rules. Despite multiple workshops, many residents and small business owners remain unaware of the financial and practical implications of these amendments. Moreover, inconsistencies in the data and assumptions used in cost-effectiveness analyses have hindered stakeholders' ability to accurately assess the impacts of the proposed rules. Transparency and outreach must be improved before moving forward.

The City of Glendora is committed to collaborating with the SCAQMD to advance air quality improvements in a manner that is equitable, cost-effective, and achievable. We urge the committee to reconsider the proposed amendments and adopt a more balanced approach that addresses the concerns of our residents and businesses.

Thank you for your attention to this critical matter.

Sincerely,

A handwritten signature in blue ink, appearing to read "Mendell L. Thompson".

Mendell L. Thompson  
Mayor

