



February 21, 2025

TO:

South Coast Air Quality Management Control Board of Directors
21865 Copley Dr
Diamond Bar, CA 91765

Dear Chair Delgado and Members of the Board,

On behalf of the Association of California Cities Orange County, representing more than 3 million residents across Orange County, I wish to express serious concerns regarding the proposed Rules 1111 and 1121.

Our organization has been closely monitoring these proposed regulations, and we have significant concerns about their impact on our communities. Our primary concerns are fourfold.

First, despite the widespread implications of these rules, public awareness remains extremely low. Many homeowners and property managers who will be directly affected by these regulations are still unaware of the impending changes and their potential financial impact. We strongly encourage additional public outreach and engagement before proceeding further.

Second, we have substantial concerns about the electrical grid's capacity to handle the increased demand that would result from widespread electrification. Before implementing such sweeping changes, we need assurance that our infrastructure can reliably support this transition.

Third, the financial impact on our residents remains unclear. Without detailed cost analysis and firm commitments regarding rebates and incentives, we risk placing an undue burden on homeowners and multifamily property owners—many of whom are already struggling with housing affordability.

Fourth, natural gas remains a critical resource for ensuring energy reliability and redundancy, especially during brownouts and natural disasters such as the recent wildfires in Southern California. Our communities have already experienced widespread power outages due to extreme weather events and wildfire-related grid disruptions. Limiting access to natural gas without a reliable backup plan could leave residents vulnerable in times of crisis.

We respectfully request that the Committee:

- **Release updated rule language** with proper review time prior to moving forward.
- **Secure firm commitments for rebates and incentives** before any implementation begins.

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- **Conduct additional public outreach** to ensure affected residents and property owners fully understand the implications of these rules.
- **Delay implementation** to allow for proper infrastructure preparation, or alternatively, consider a **phased, incentive-based pilot program** that allows time for industry, infrastructure, and grid capacity enhancements to be made before full implementation.

ACCOC stands ready to work with SCAQMD to develop effective, practical solutions that truly improve air quality while considering the real-world impacts on our communities. We urge this Committee to take a balanced approach that prioritizes both environmental progress and energy security for our residents.

Thank you for your time and consideration.

Sincerely,

Kris Murray
Executive Director

cc: ACC-OC Board of Directors