



CITY OF RANCHO CUCAMONGA

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February 24, 2025

Hon. Vanessa Delgado, Chair
South Coast Air Quality Management District Governing Board
21865 Copley Dr.
Diamond Bar, CA 91765

Dear Chair Delgado and Governing Board Members -

The City of Rancho Cucamonga opposes the proposed amendments to Rules 1111 and 1121 and respectfully urges you to delay their adoption. These amendments, while intended to address air quality goals, raise significant concerns for our residents, businesses, and local government. We believe further analysis, stakeholder input, and exploration of alternative solutions are essential to mitigate the negative impacts of these rules.

The proposed rules impose substantial mechanical, electrical, and plumbing retrofit requirements on commercial buildings, single-family homes, and multifamily properties, resulting in dramatic cost implications for thousands of families who call Rancho Cucamonga home. Additionally, these mandates will further strain the Rancho Cucamonga Municipal Utility (RCMU), which is already working to meet rising electricity demands. Increased operational burdens will drive up rates, disproportionately impacting low-income households and disadvantaged communities (DACs).

These amendments will exacerbate housing inequities, placing an even greater burden on lower-income households already struggling with rising utility and housing costs. The high compliance costs could also discourage development or compel property owners to sell multifamily properties, significantly reducing the availability of affordable housing in our city and across the region. This outcome directly undermines efforts to expand housing accessibility for middle- and low-income families, further endangering vulnerable populations with displacement and economic hardship.

Moreover, limiting hot water access during power outages compromises home resiliency during emergencies. Hot water is essential for sheltering in place, and by mandating retrofits that remove or limit this capability would create untenable conditions, particularly for vulnerable populations. Finally, these rules diminish local autonomy. Cities should have the flexibility to adopt measures tailored to the unique needs of our communities rather than being subjected to one-size-fits-all mandates. Local control allows us to balance environmental goals with equity, affordability, and resilience.

We share your commitment to clean air and improved quality of life for all Southern Californians. However, the current versions of Rules 1111 and 1121, and the current concepts discussed at the 7th Working Group Meeting on 2/13/2025, will have unintended consequences that undermine these shared goals. We urge the Governing Board to delay the adoption of these amendments to allow for comprehensive evaluation of their economic, social, and technical impacts. Thank you for your attention to this important matter. We stand ready to engage in further dialogue to find balanced solutions that meet environmental goals without disproportionate harm to our residents and communities.

Sincerely,

Mayor L. Dennis Michael