

December 18, 2024

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

Re: OCBC's Oppositon to Proposed Amended Rules 1111 & 1121

Dear SCAQMD Board Members:

Orange County Business Council (OCBC), the leading voice of business in Orange County, is writing today to express our strong opposition to Proposed Amended Rules (PAR) 1111 & 1121, and respectfully request that the South Coast Air Quality Management District (SCAQMD) reconsider these burdensome and consequential amendments.

OCBC has long supported sustainable public and private infrastructure that protects public health, facilitates a well- educated public and workforce, and supports a robust economy – all while providing for reliable natural gas and electric transmission, distribution, and storage systems. Further, OCBC fully supports sufficient “green” and open space infrastructure projects that promote quality of life. However, considering what data and information is currently available, we have serious concerns regarding the potential implementation of PARs 1111 & 1121. The overall impact these PARs would have are costly and detrimental to businesses and residents throughout the district.

If these PARs are adopted in their current form, it could have a significantly negative impact on the housing market. This is already a point of contention for Orange County's resident workforce. Mandating building owners to refurbish their facilities to be in compliance with these regulations, especially when done at scale, will cost owners an excessive amount in costs – which will undoubtedly be passed down to renters. This comes at a time in which the cost of living is at an all-time high across the region.

These PARs will also have a significant impact on the hospitality industry – which is one of Orange County's most vibrant and diverse economic sectors. Many in the hospitality industry are still recovering from losses that were experienced during the lockdowns related to the COVID-19 pandemic. Adding expansive regulatory burdens, just a few years removed from the pandemic, could prove to be detrimental to a major sector of our local economy that is still recovering.

OCBC is strongly opposed to these burdensome and costly proposed amended rules and encourages you to reconsider in the interest of the region's economic well-being which we are all dependent upon. We will always support a comprehensive approach, with inclusive dialogue, to address the state's infrastructure needs. We will continue to work with government entities, such as SCAQMD, to ensure that the voice of Orange County's business community is engaged when discussing comprehensive infrastructure improvements – such as those being considered through PARs 1111 & 1121. Thank you for your time and consideration on this matter.

Sincerely,



Jeffrey Ball
President/CEO