

May 28, 2025

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

RE: Continued Opposition – Proposed Amended Rules 1111 & 1121

Dear Chair Delgado and Honorable Governing Board Members:

On behalf of the California Restaurant Association (CRA), and the thousands of restaurants within the SCAQMD we write to express our strong opposition to the Proposed Amended Rules (PAR) 1111 and 1121 and urge the Governing Board to vote no on June 6.

While we applaud the District's ongoing efforts to improve air quality, our member restaurants remain heavily concerned with the significant economic and feasibility impacts that are associated with PAR 1111 and 1121—which will result in increased compliance costs, higher consumer prices, and costly retrofits.

The proposed amended rules would dramatically increase operating and living costs for both businesses and families. These changes would force many to adopt expensive all-electric space and water heating systems or, alternatively, penalize those who choose to continue using cost-effective natural gas by adding steep fees—effectively making many pay extra just to maintain more affordable energy choices.

In addition to these burdens, the proposed manufacturer fees represent a hidden cost that will inevitably trickle down to everyday consumers. It's estimated that these amended rules could add over \$300 million in annual expenses for residents, totaling approximately \$7.7 billion over the typical 25-year lifespan of appliances. And that's assuming these new electric units actually last that long—recent studies show many fall short of their expected lifespans, making them one of the least reliable and most costly options on the market.

At a time when families and small businesses are already facing unprecedented cost-of-living pressures, these additional financial burdens are simply unsustainable. The rules also fail to account for the substantial costs of retrofitting older buildings, specifically those designated historic and occupied by restaurants, apartments, schools, and small businesses—and aren't equipped for full electrification. These overlooked expenses could easily push many establishments to the breaking point.

We all support cleaner energy and a more sustainable future, but these changes must be practical, affordable, and fair to the communities they impact most. We urge the Board to reject this one-size-fits-all regulatory approach and instead engage with stakeholders in a meaningful way to develop pragmatic solutions that promote affordability while protecting the environment and our local economy.

Sincerely,

A handwritten signature in black ink, appearing to read "Jackie Romero". The signature is fluid and cursive, with the first name "Jackie" and last name "Romero" clearly distinguishable.

Jackie Romero
Director of Local Government Affairs
California Restaurant Association

CC: Members of the Governing Board