



CITY OF RANCHO CUCAMONGA

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May 5, 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 appreciates the opportunity to provide feedback regarding the proposed amendments to Rules 1111 and 1121. As currently written, these amendments – while intended to address clean air quality goals – raise significant concerns for our residents and businesses. The revised amendments remain burdensome and over-reaching, and do not protect affordability or consumer choice. 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. The proposed rules effectively ban certain appliances covered by federal guidelines outlined in the federal Energy Policy and Conservation Act (EPCA). 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.

Despite the alternative compliance pathway outlined in the proposed rules, the end result remains that undue burdens will be passed along to consumers. Even in scenarios where federal or state incentives are available, the significant upfront expenses required for the purchase and installation of electric appliance alternatives, combined with the potential need for costly home electrical upgrades, will be forced upon the Rancho Cucamonga residents.

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. The current proposed amendments do not allow local jurisdictions to implement cost-effective policies that are appropriately suited for their specific communities.

Given these concerns, we urge the South Coast AQMD consider the following recommendations:

1. Delay consideration and adoption of the proposed amendments until a thorough feasibility study of lower-NOx alternatives, including fuel-neutral pathways, is completed.
2. Hold a public workshop to provide stakeholders with the opportunity to review and discuss cost-effective alternatives that protect both air quality goals and consumer affordability.
3. Reconsider the legal and economic implications of proceeding with rules that effectively limit access to widely used, affordable, and economical appliances.

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, 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 remain ready to engage in further dialogue to find balanced solutions that meet environmental goals without disproportionate harm to our residents and communities.

Sincerely,

A handwritten signature in blue ink, reading "L. Dennis Michael". The signature is fluid and cursive, with the first name "L. Dennis" and the last name "Michael" clearly distinguishable.

Mayor L. Dennis Michael