



City of Villa Park

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May 27, 2025

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

RE: Comments on Proposed Amended Rules 1111 and 1121

Dear Chair Delgado and Members of the Board,

On behalf of the City of Villa Park we are writing to express our concerns regarding the South Coast Air Quality Management District's proposed amendments to Rules 1111 and 1121. Our city, like many in the Orange County region, is deeply committed to improving air quality and advancing environmental sustainability. However, we believe these proposed amendments warrant further review and revision to ensure they are economically viable, socially equitable, and practically achievable for all our residents.

Economic Impacts and Consumer Protection

We are concerned that the current socioeconomic analysis fails to reflect the true financial impact these rules would have on households—particularly seniors, renters, and low-income residents. Outdated assumptions around interest rates (1%–3%) do not align with current market conditions (3%–7%). Furthermore, the analysis does not adequately consider the high costs of retrofitting older homes and multifamily properties, including necessary electrical upgrades.

Mitigation fees and transition expenses are likely to be passed onto consumers, and while rebates are proposed, they fall short of meeting the needs of a region as socioeconomically diverse as ours. Limiting affordable, accessible energy options will create significant disparities.

Energy Redundancy and Reliability Concerns

The current policy trend to eliminate natural gas appliances raises serious concerns about grid reliability and energy redundancy. Given Southern California's vulnerability to Public Safety Power Shutoffs and rolling brownouts, preserving cost effective natural gas options as a backup energy source is critical for community resilience, particularly during emergencies.

Transparency and Public Engagement

We also question the regulatory path forward. Just recently, the California Air Resource Board (CARB) withdrew the Bay Area's similar rule from federal State Implementation Plan (SIP) consideration. Why should we expect a different outcome for our region? Moreover, public outreach to date has been insufficient—many property owners and residents, especially in disadvantaged communities, remain unaware of the full scope and cost implications of the proposed amendments.

Environmental Benefit vs. Economic Burden

While we support strategies to reduce NOx emissions, it is important to acknowledge that stationary sources, such as residential appliances, are not the primary contributors. Mobile

NICOL JONES, Mayor • JORDAN WU, Mayor Pro Tem

ROBERT FRACKELTON, Councilmember • KELLY MCBRIDE, Councilmember • CRYSTAL MILES, Councilmember

sources (e.g., freight, shipping, and rail)—which fall under federal jurisdiction—continue to dominate NOx output. The proposed rules would place a disproportionate burden on local households with only marginal environmental benefit.

Recommendations

We respectfully urge the AQMD Board to consider the following before moving forward:

- Postpone further rulemaking until an updated socioeconomic analysis—accounting for current interest rates and retrofit costs—is completed.
- Ensure robust consumer protections by securing comprehensive and scalable rebate programs across all income levels.
- Maintain affordable, natural gas access as a backup energy option to support reliability and resilience.
- Increase community outreach, particularly to low-income and multifamily housing stakeholders.
- Explore a phased, incentive-based pilot program to build voluntary participation and infrastructure readiness.

Conclusion

The City of Villa Park supports meaningful efforts to improve air quality but cannot endorse a regulatory approach that imposes substantial economic and infrastructure burdens on our community without delivering proportional environmental benefits. Unless all the recommended revisions outlined above are fully incorporated into future versions of the proposed rules, the City of Villa Park will remain in formal opposition to any amended versions. Our opposition shall remain in effect unless and until our City Council formally votes to withdraw it.

We are committed to collaborating toward a sustainable path that protects both our residents and our environment. We urge the South Coast AQMD Board to revise its approach to prioritize affordability, reliability, and equitable implementation across all jurisdictions. If you have questions, please contact City Manager Steve Franks at sfranks@villapark.org.

Thank you for your consideration.

Sincerely,



Nicol Jones
Mayor