

SWCLC Southwest California Legislative Council



★ A Regional Business Advocacy Coalition in Riverside County ★

June 2, 2025

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

RE: Opposition to Proposed Rules 1111 & 1121

Dear Chair Delgado,

On behalf of the Southwest California Legislative Council (SWCLC), a regional business advocacy coalition committed to advancing policies that promote economic development, job growth, and regulatory balance, we respectfully submit this letter in opposition to the South Coast Air Quality Management District's Proposed Rules 1111 and 1121.

While we fully support efforts to improve air quality and protect public health, these proposed rule changes—which significantly tighten nitrogen oxide (NOx) emission limits on residential and commercial gas furnaces (Rule 1111) and gas-fired water heaters (Rule 1121)—would impose considerable and immediate cost burdens on small businesses, contractors, homeowners, and the broader regional economy.

The SWCLC's 2025 Public Policy Platform emphasizes the importance of:

- Balanced environmental policy: Environmental improvements must be weighed alongside economic impacts to avoid placing Southwest California businesses at a competitive disadvantage.
- Rigorous cost-benefit analysis: Major regulatory changes should include comprehensive assessments of financial, operational, and affordability impacts on our communities.
- Reliable and affordable energy: We support policies that promote energy affordability and access, especially for working families and local employers.
- Streamlined and responsible regulation: We advocate for reform of CEQA and other overly burdensome mandates that hinder innovation, housing development, and infrastructure improvement.

Rules 1111 and 1121, in their proposed forms, do not reflect a pragmatic or economically feasible path forward for many in our region. The retrofitting of compliant technologies will significantly raise costs for residential and commercial developments, discourage homeownership, and stifle job creation in key trades. These impacts are particularly concerning amid ongoing efforts to address housing affordability and regional economic recovery.

We respectfully urge the Governing Board to reconsider these proposals and instead pursue a more collaborative, incentive-based approach that promotes clean technology without jeopardizing economic vitality. We are prepared to work with SCAQMD leadership and staff to help develop strategies that balance environmental progress with economic resilience.

Thank you for your leadership and consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Patrick Ellis", with a long horizontal flourish extending to the right.

Patrick Ellis, President/CEO, Murrieta/Wildomar Chamber of Commerce

A handwritten signature in black ink, appearing to read "Brooke Nunn", with a large loop at the end.

Brooke Nunn, President/CEO, Temecula Chamber of Commerce

A handwritten signature in black ink, appearing to read "Kim J. Cousins", with a long horizontal flourish extending to the right.

Kim J. Cousins, President/CEO, Lake Elsinore Chamber of Commerce

A handwritten signature in black ink, appearing to read "Katie B. Luna", with a long horizontal flourish extending to the right.

Katie Luna, President/CEO, Menifee Valley Chamber of Commerce