



Strengthening the Voice of Business Since 2008

September 20, 2024

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 Los Angeles County Business Federation, widely known as BizFed, is proud to unite more than 240 diverse business organizations representing 420,000 employers with 5 million employees in Southern California. On behalf of this diverse coalition, including individual residential and commercial property owners and property managers, various trade associations, and individual companies in the region, urge you to defer consideration of Proposed Amended Rules 1111 and 1121 to allow South Coast Air Quality Management District (SCAQMD or District) Governing Board members and staff to receive additional information, data, input and dialogue from the numerous stakeholders potentially impacted by this proposed rule.

We continue to have significant concerns regarding the scale of the mechanical, electrical, plumbing and other requirements necessary to comply with retrofits of existing commercial and multifamily residential properties, as well as the veracity of the District's estimates of the utility costs associated with upgraded service, and the dramatic cost implications to hundreds of thousands of families who rent their homes.

It is highly likely that, if adopted by the Governing Board, the high costs of compliance with Rules 1111 and 1121 will force the owners of older multifamily properties to sell or redevelop their properties, subsequently resulting in a dramatic reduction in the availability of affordable housing for tens of thousands of the region's residents.

As we have stated previously, no one wants clean air and water more than the thousands of property owners and managers that benefit from these and other quality of life benefits that draw and retain the residents and business owners who populate their properties. However, the

current versions of PAR 1111 and 1121 continue to portend consequences that will lead to a multitude of negative impacts, impacting jobs and increasing the cost of living in our region.

It is essential to note that it will be years before we reach any of the implementation deadlines within these rules, and as such allowing additional time to ensure that the District has the most accurate information regarding the viability and costs of retrofits will not in any way be detrimental to air quality efforts, but rather will foster a greater likelihood of future compliance and adoption of zero emission technologies.

**We urge the SCAQMD Governing Board to delay consideration/adoption of PAR 1111/1121 to allow District staff to continue to work with owners of a variety of commercial and multifamily residential properties to identify buildings of various sizes, ages, and construction types and incorporate the information gleaned from these visits and other sources in order to prepare a proposed rule and socioeconomic impact study that incorporates all available information.**

Sincerely,

Tracy Hernandez