



September 20, 2024

The Honorable Vanessa Delgado
Chair
South Coast Air Quality Management District Governing Board
21865 Copley Dr.
Diamond Bar, CA 91765

RE: Request for Delay on Proposed Amended Rules 1111 and 1121 Due to Economic and Housing Concerns

Dear Chair Delgado and Governing Board Members,

The Valley Industry and Commerce Association (VICA) strongly urges the South Coast Air Quality Management District (SCAQMD) to postpone any action on Proposed Amended Rules (PAR) 1111 and 1121.

VICA is concerned about the extensive infrastructure changes—particularly in mechanical, electrical, and plumbing systems—required to comply with these amendments, which present an onerous burden on both property owners and tenants. These costs will have disproportionate effects, exacerbating the housing crisis in our region.

The anticipated compliance costs of PAR 1111 and 1121 could lead to the sale or redevelopment of older multifamily residential properties, reducing the availability of affordable housing for thousands of Southern California residents. This would only intensify the housing challenges our region faces, with potentially far-reaching economic and social impacts.

The current timeline and requirements in PAR 1111 and 1121 impose excessive financial strain on businesses and families, likely resulting in increased costs of living and a loss of affordable housing. A more measured approach, allowing for additional stakeholder input and accurate cost assessments, is essential to ensure sustainable outcomes.

There is ample time before the implementation deadlines of these proposed amendments, providing the District with the opportunity to engage with stakeholders and further refine the rules. This will lead to a more practical solution that achieves environmental goals without jeopardizing housing and business stability.

VICA respectfully requests that the Governing Board delay the adoption of PAR 1111 and 1121 to allow for more comprehensive research and engagement with impacted stakeholders. This will ensure that the rules are based on the most accurate and complete information, minimizing adverse consequences and fostering greater compliance.



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

Stuart Waldman
VICA President