



Orange County Council of Governments

Orange County Council of Governments (OCCOG)  
3972 Barranca Parkway, Ste. J127  
Irvine, CA 92606

[info@occog.com](mailto:info@occog.com)

December 16, 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 Orange County Council of Governments (OCCOG) has just recently been made aware of two proposed rules being advanced by the South Coast Air Quality Management District (SCAQMD) for consideration by the Governing Board. On behalf of the OCCOG Board of Directors, we regret to inform you that we are opposed to Proposed Amended Rules (PAR) 1111 and 1121. We urge you to defer consideration of these rules in order to allow SCAQMD Governing Board members and staff to have sufficient time to receive additional information, data, input, and dialogue from the numerous stakeholders potentially impacted by this proposed rule.

OCCOG has significant concerns regarding the scale of the mechanical, electrical, plumbing, and other requirements necessary to comply with retrofits of existing commercial buildings, single-family homes and multifamily residential properties, as well as the dramatic cost implications to thousands of families who call Orange County home.

It is highly likely that if Rules 1111 and 1121 are adopted by the Governing Board, the high costs of compliance 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 across the region.

OCCOG shares your commitment to clean air and water and other quality of life benefits that draw and retain the residents and business owners who live here. However, the current versions of PAR 1111 and 1121 will impact job creation and increase the cost of living in our region.

We urge the SCAQMD Governing Board to delay consideration/adoption of PAR 1111/1121 to allow time for a more robust public outreach process that we ensure residents are properly informed and that questions regarding cost, technology, and the availability of potential incentives are able to be addressed. If you have any questions about OCCOG's position on this matter, please contact myself at (949) 698-2856 or by email at [marnie@occog.com](mailto:marnie@occog.com).



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Sincerely,

Marnie O'Brien Primmer  
Executive Director