

SCAQMD PAR 1111 and PAR 1121

October 29, 2024

Mr. Peter Campbell
Planning, Rule Development, and Implementation
South Coast Air Quality Management District
21865 Copley Drive
Diamond Bar, CA 91765
Email: pcampbell@aqmd.gov

Re: Comments on PAR 1111 and PAR 1121

Dear Mr. Campbell:

Newcastle Partners appreciates the opportunity to provide comments on the South Coast Air Quality Management District proposed Amended Rule 1111 – Reduction of NO_x Emissions from Natural Gas-Fired Furnaces (PAR 1111) and Proposed Amended Rule 1121 – Reduction of NO_x Emissions from Small Natural Gas-Fired Water Heaters (PAR 1121).

Our company is a small, commercial developer based exclusively in southern California. We are committed to reducing our carbon footprint while meeting the needs of our tenants. Installation of energy efficient lighting controls, compliance with outdoor water conservation requirements, and other energy-reducing measures can be found throughout our properties.

We are concerned that the proposed rules do not take into account issues facing industrial and commercial real estate property owners and our tenants. For example, shifting from natural gas equipment to electrical equipment will place additional strain on our current electrical infrastructure. Many electrical utility providers may not be prepared to meet the increased demand created by these changes, which could result in delays for new electrical hook-ups. Such delays could have a substantial negative impact on the occupancy timelines for commercial and industrial properties.

We would respectfully request that the District defer consideration of the proposed rules until February 2025 or later, in order to provide a sufficient amount of time to engage the industrial and commercial real estate industry and issues specific to our industry and tenants.

Thank you for taking into consideration our concerns. Please contact Courtney Wing with any questions.

Sincerely,



Courtney Wing
Development Manager
Newcastle Partners
courtney@newcastlepartners.com