

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:

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

Our company is one of the oldest commercial real estate services companies 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 consider issues facing commercial and industrial real estate property owners and our tenants. For example, commercial property owners already face sky high costs for rent, insurance and other daily operating necessities.

We would respectfully request that the District revise PAR 1111 and PAR 1121 to provide commercial and industrial property owners with greater flexibility and time to deal with already existing leases set to renew by the end of 2026 or until such time that our local utility provider informs us that they can accommodate any new electrical hook-up which would be required due to the installation of a new system in order to avoid any additional delays for occupancy of our properties.

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

Sincerely,

Steve Pearson

Principal
DAUM Commercial Real Estate Services