

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:

ECM Management LLC 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 involved in ground up development and construction of industrial buildings. 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 commercial and industrial real estate property owners and our tenants. For example, the need to install electric water heaters and furnaces will have added cost implications both for these components (which are costlier than their natural gas options) as well as the added cost for increased electrical service components and usage. Modifying the size of an already design electrical system requires both additional schedule considerations as well as design costs.

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 myself, Josh Leite, with any questions.

Sincerely,



Josh Leite
Senior Development Manager
ECM Management LLC