

Comment Letter #52



June 21, 2022

Sang-Mi Lee, PH.D.
Planning & Rules Manager
South Coast AQMD
21865 Copley Drive
Diamond Bar, CA 91765

Re: 2022 Draft Air Quality Management Plan - C-CMB-03 Emission Reductions from Commercial Cooking Devices

Dear Dr. Lee,

On behalf of the California Restaurant Association (CRA), I am writing to raise concerns regarding the proposed control measures on commercial cooking devices. The CRA represents thousands of restaurants statewide, many of which are independent, chef-driven restaurants that call Southern California home.

We greatly appreciate the robust dialogue that is taking place regarding the 2022 Draft Air Quality Management Plan and the various ways in which it looks to reduce NOx emissions. However, targeting restaurants cooking devices should not be one of them.

The restaurant community often leads on energy efficiency and environmental stewardship. Natural gas bans often have a unique- and negative impact- on restaurants.

The use of natural gas- and fire specifically- has traditionally been a tool that enhances the art of cooking for so many of these local restaurants and we want to continue to raise concerns about the impacts of a natural gas ban for existing and future restaurants.

Restaurants that use natural gas do so for the practical aspects of its use in their menu development, preparation of a wide variety of cuisines and dishes, coffee roasting, and for the quality of the technique one gets from natural gas cooking methods. After all, one doesn't often hear a chef get excited about firing up an electric wok for instance.

Many restaurants specialize in making products which require the use of specialized gas appliances for preparation, including for example flame-seared meats, charred vegetables, or the use of intense heat from a flame under a wok. Additionally, restaurants specializing in ethnic foods may be unable to prepare many of their specialties without natural gas.

The unique needs of the local restaurant community and its practical needs as it relates to fire as a tool for cooking must be acknowledged. We believe control measures for commercial cooking devices that look to replace gas stoves, ovens, broilers, and other devices with electric cooking devices or induction cooktops should be removed as a control measured.

California Restaurant Association
P.O. Box 32482, Los Angeles, CA 90032

Often during these policy discussions, there is mention (from non-restaurateurs) of technological innovation in cooking methods and cost. While it is true there may be some innovative cooking methods out there- and more being developed- not all restaurants are the same in terms of their culinary specialties. While going all-electric may work for some, it does not work for all restaurant types.

A one-size-fits-all approach to energy policy and restaurants is misguided.

We want to remain a productive partner in these efforts and the larger issue.

For these and other reasons, we ask that you remove C-CMB-03 as proposed controlled measure in the 2022 Draft Air Quality Management Plan.

Thank you,

A handwritten signature in blue ink, appearing to read "David Juarez". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

David Juarez
Director of Local Government Affairs
California Restaurant Association