

## 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:

**NAI Capital Commercial** 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 manages and leases commercial real estate. 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, some areas do not have the proper electrical to put an ELECTRIC FURNACE OR ELECTRIC WATER HEATER.

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 me if you have any questions.

Sincerely,

**Chris Jackson**  
CEO  
**NAI Capital Commercial**