



April 29, 2024

**RE: PAR 1146.2 - Request for Delay**

South Coast Air Quality Management District  
21865 Copley Drive  
Diamond Bar, CA 91765

Chair Vanessa Delgado:

I am contacting you to express the concerns of the Plumbing-Heating-Cooling Contractors Association of California (CAPHCC) with PAR 1146.2, which aims to phase out natural gas water heaters and boilers for commercial properties and multifamily properties in the South Coast Air Quality Management District (SCAQMD).

CAPHCC is the California Chapter of the Plumbing-Heating-Cooling Contractors Association, which is dedicated to advancing and educating the plumbing and HVACR industry for the health, safety, and welfare of society and protecting the environment. PHCC provides legislative advocacy, education, and training to approximately 3,300 plumbing and HVACR businesses and 65,000 technicians. Our members work in the construction industry's residential, commercial, new construction, industrial, and service and repair segments. Approximately 125 state and local association affiliates are part of PHCC's chapter network.

This proposed rule would impose a significant financial burden, potentially becoming SCAQMD's most expensive rule in its 48-year history. Projected costs from SCAQMD staff fall between \$49 and \$97 million per year; however, analysis from outside experts shows costs could be five times higher than this estimate. This financial strain could have far-reaching implications for the affected community.

CAPHCC requests that this rule be placed on hold until more site visits can be completed, additional analysis on actual costs and feasibility is finished, and more input and collaboration from impacted stakeholders is done.

Sincerely,

Richard Markuson

Plumbing-Heating-Cooling Contractors Association of California (CAPHCC)  
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