



# Pacific Lifestyle HOMES

To: **Washington State Building Code Council**  
Attention: Doug Orth, Council Chair

From: Ryan Styger  
Pacific Lifestyle Homes, Inc.  
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Re: **Public Comment on Proposed Amendments R402.4.2.1 and R403.1.3**

Date: September 25, 2019

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-Introduction: We are a regional single-family home builder with operations in Puget Sound and the Vancouver Washington metro area, building approximately three hundred homes in 2019. We build in multiple price segments within each of our markets ranging from mid-level move up, to custom homes on acreage. We aim to build a quality home that includes the features buyers want and need, but are cautious to not over build homes and include features or efficiencies that are not needed or desired by our customers.

I am writing today on behalf of Pacific Lifestyle Homes to testify in opposition to the above noted code amendments.

We are consistently facing price increases while trying to provide quality housing in the state of Washington at a reasonable price. Some price increases are un-avoidable, others can be avoided. If the proposed amendments go into effect, they will increase the manufactures cost to produce their product. The manufacture will ultimately pass down the cost to the builder and in turn raising the cost of houses in Washington. I see this cost increase as an avoidable one.

I hope you will consider my below points as to why the proposed amendments should not be put into place.

- The fireplaces we install in our homes are not relied upon for heating the house. The fireplace is turned on for ambiance on occasion. The amount of time that the fireplace is on and functioning throughout the year is minimal. If the proposed code amendment were implemented the efficiencies gained would be minimal due to the fact that the fireplaces are not used often enough for the efficiencies to be realized.
- The gas fireplace efficiency proposal does not draw an adequate distinction between heater-rated and decorative appliances. I feel it is important to distinguish between the two categories of product because their uses are very different. The majority of the fireplaces installed in new home construction today are decorative, and as noted above used minimally for ambiance and not to heat the home. It should be noted that other regulator agencies have made a clear distinction between heater-rated and decorative fireplaces. It is my understanding that in most cases decorative fireplaces do not have an imposed FE minimum, while heater-rated fireplaces do have an FE minimum. I can support a reasonable FE minimum for heater-rated fireplaces because of their use. I would not support a FE minimum for decorative fireplaces because the use is minimal and not intended to heat the room.



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- I feel that the building code is not the appropriate location for regulation of these appliances due to the complexity surrounding the manufacturing of the appliances, how they will function, and the economic impacts of increased regulation. These decisions should be made in an appliance efficiency discussion either through statute or through a regulatory function that involves manufacturers. It is my understanding that the Province of British Columbia, and Canada have all developed appliance efficiency standards through regulation and the state of California is currently working on a regulation. Multiple workshops and meetings are/ were held with the industry to develop proposals that will work for consumers and avoid economic devastation in the industry. It seems appropriate that Washington would follow a similar process to ensure that new regulations are reasonably obtainable and that manufacturers can consistently produce a quality product while complying with regulations.
- In regards to eliminating continuous pilot lights, this to me feels like building code attempting to govern manufacture of appliances. Design and manufacturing of these appliances is complex, and as such manufactures and other stakeholders should be intimately involved in the discussion/ process to ensure any changes are reasonable, realistic and will allow for operational efficiency for the end user, our customers. I'm told by our manufactures that climates such as ours in Western Washington need special consideration for pilot lights due to the damper nature of our region. This is a good example of the need for manufacture and stakeholder input.

-Closing Thoughts: We urge that the code council deny the code amendments for the following reasons. 1) The lack of distinction between heater-rated and decorative fireplaces causing the majority of fireplaces to be overly efficient for minimal use. 2) The proposed changes to pilot lights as I understand it will potentially impact the reliable functionality of the appliances in our region. 3) Again, I feel that the cost increases these code amendments will impose are cost increases that can and should be avoided. The code amendments will increase costs to end users and further contribute to the housing affordability crisis we have in Washington.

If you feel further information is necessary, please don't hesitate to contact me directly. Thank you in advance for your time and consideration of this matter

Ryan Styger

Pacific Lifestyle Homes, Inc.