

Public Oral Testimony Summary – Sept. 29-30 and Oct. 14, 2022

Proposed 2021 Mechanical Code

Name	Group if applicable	Subject	Stance	Summary
September 29 Oral Testimony				
Martin Gibbins	League of Women Voters of WA	WSEC-R Heat Pump proposals (065, 066) (also IMC/IRC 062/063)	Support	Speaking for the 2200 league members in support of heat pumps. Climate change is a threat to good governance and equity of residents. Methane leakage and burning byproducts degrade the health of residents, esp. children. We also support the increased ventilation in homes.
Coleen Anderson		Heat Pump Proposals (065, 066) (also IMC/IRC 062/063)	Support	In support of heat pumps. Concerned for her grandchildren’s health and safety with fossil fuel air pollution. We are seeing more people injured or dying from the effects of the climate crisis. Homes with gas stoves have 50-400 percent higher nitrogen dioxide levels and pose a 42 percent increased risk of asthma. Retrofits are more expensive.
Ali Lee	Climate Solutions	WSEC-R Heat pump proposals (065, 066) (also IMC/IRC 062/063)	Support	You have the opportunity to improve both indoor and outdoor air quality. BIPOC and poor communities are more heavily impacted by air pollution. Gas appliances created air pollution—in Washington they generate twice the nitrous oxide than power plants. Climate change is creating insufferable conditions in the summer months. Heat pumps for heating and cooling can help alleviate the impact.

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Alona Steinke		WSEC-R Heat pump proposals (065, 066) (also IMC/IRC 062/063)	Support	Gas appliances pollute both indoor and outdoor air and are not regulated. Gas stoves leak constantly in the home, so we need more ventilation. Has used a heat pump for over 40 years. Urge you to adopt one of the strongest building codes in the US.
Russell Maier		WSEC-R (also IMC/IRC 062/063)	Support	In support of the updates. We need to reduce methane, a major source of indoor air pollution and contributor to climate change; and remove the toxic gases and particulates from gas stoves. This will help improve the health and quality of life.
Mark Vossler	WA Physicians for Social Responsibility	WSEC-R (also IMC/IRC 062/063)	Support	Cardiologist and president of WAPSR. We are witnessing the impact of climate change and air pollution. Will send a detailed report. Burning gas produces dangerous levels of greenhouse gases and other pollutants, which increase the risk of asthma and as well as other health risks. These risk fall disproportionately on lower income households, where people are more likely to live in smaller dwellings. Since electric home heating and cooking is readily available and cost effective, there is no excuse to continue burning gas.
Annemarie Dooley		WSEC-R Heat Pump Proposals (065, 066) (also IMC/IRC 062/063)	Support	Burning gas increases the risk of asthma in children and contributes to global warming. Wildfire smoke exposure increases ER visits for breathing problems. Please adopt the energy code updates.
Chris Covert-Bowlds	WA Physicians for Social Responsibility	WSEC-R: Heat Pump Proposals (065, 066) (also IMC/IRC 062/063)	Support	Urge you to adopt the code and move away from methane in buildings. This is really important for addressing health impact of

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				fossil fuels. Homes are the largest source of carbon and climate pollution, and that pollution can exacerbate breathing issues and lead to lung damage.
Ruth Sawyer		WSEC-R: Heat Pump Proposals (065, 066) (also IMC/IRC 062/063)	Support	Urge the adoption of heat pumps and increased ventilation requirements for gas stoves. These are a clear way to act on commitments to transition away from fossil fuels.
September 30 Oral Testimony				
Andrea Smith	BIAW	IMC: 062 & 063	Oppose/ Modify	We are in opposition to the range ventilation proposals. We'd like to see a uniform standard for all ranges, not singling out gas. Lab controlled environments don't reflect real life. The self-cleaning function of ovens is the primary cause of harmful byproducts. Good ventilation is important but should be addressed through education.
Jonathan Kocher	RMI	IMC: Gas Stove Ventilation Proposals	Support	Urge you to pass all proposals, especially the range hood proposals. Even short term exposure to low levels of nitrogen dioxide can cause health effects. An EPA study shows that indoor exposure to NO2 may pose a higher health risk than outdoor exposure. Gas stoves emit 50-400 percent higher concentrations of NO2 than electric stoves and produce higher amounts of particulate matter.

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Claire Richards	Washington Physicians for Social Responsibility	IMC: Gas Stove Ventilation proposals	Support	Support strengthening the ventilation rates for stoves to improve health and reduce health disparities in the state. The pollutants from burning gas can produce a range of health effects. As we tell people to stay indoors to reduce exposure to wildfire smoke, it is important to have sufficient ventilation. Washington has one of the highest rates of asthma in the nation.
Andrea Velarde	WPSR at PNWU	IMC: Gas Stove Ventilation Proposals	Support	As a medical student, I urge you to adopt the increased ventilation requirements to more effectively remove the toxic fumes from gas powered appliances. This update is important to address equity in underserved communities, which have a higher rate of exposure living in a smaller space. This proposal can save thousands of healthcare dollars while maintaining heal equity in our communities.
Rebecca Hoshaw	WPSR at PNWU	IMC: Gas Stove Ventilation Proposals	Support	As a student doctor, my goal is to treat the whole person. A harmful environment can have a negative impact on all facets of a person's health. Establishing a strong ventilation requirement means setting a high standard for clean energy in the home and better health an equity in the community.
Larry Andrews		IMC: 605.5	Oppose/ Modify	Speaking against the requirement for MERV 13 air filters. I believe that the F300 electronic air cleaners can do just as good a

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				job, and the filters are reusable. They don't have the pressure drop associated with MERV 13 filters and are commonly used in casinos to clean the air. Do not adopt this requirement or add an exception for air cleaners.
Randall Cooper	AHAM - Association of Home Appliance Manufacturers	IMC & IFGC	Modify	AHAM is an approved alternate to HVI in California and should be noted as such in the Washington code. Cited section lists HVI and their directory and equivalent but doesn't specify AHAM although it is listed in the previous section. AHAM is deeply involved in all technical matters relating to range hoods. Capture efficiency is still not ready to be included in regulation.; reproducibility is still an issue.
Anna Janacek	WA Physicians for Social Responsibility	IMC: Gas Stove Ventilation Proposals	Support	In favor of the increase ventilation requirements. Gas stoves emit harmful pollutants that impact the developing bodies and lungs of children, even when turned off, and can exceed the level deemed illegal for outdoor pollutants. This is especially true of children who are low income and live in small spaces without control over the fuel used in the home. While we can't stop wildfire smoke or the heat dome, we can take a step to improve the health of families.
D Scott Peterson	NW Gas Association	IMC 062, 063	Oppose	We oppose this bias against gas stoves. There are potential health risks from cooking

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				<p>without ventilation for both gas and electric stoves. But there is no science proving what's being said here, that gas stoves are particularly dangerous; no single peer-reviewed study. Conversely, an international study of asthma and allergies in childhood which analyzed over 500,000 children in 47 countries found no evidence of association between asthma and gas cooking.</p>
Mike Moore	Broan-NuTone	IRC/IMC: Range Hood Proposals	Support	<p>These proposals are in line with the data coming out of Lawrence Berkley National Lab on acceptable exposure to hazardous pollutants. This is a simplified version of the California regulations. Compliant equipment exists and there may be no additional cost when using an electric stove. This is a great model for national codes. In response to Scott Peterson, during the development of California's Title 24, there was discussion of the health studies associated with exposure to cooking pollutants—products of combustion and particulate matter—and I would urge the council to look through those case reports.</p>
Ian Casey	NW Natural	IMC	Oppose	<p>This range hood proposal was disapproved at the Technical Advisory Group, and despite that disapproval the MVE committee chose to move it forward anyway. We support range hoods and good ventilation, but do not</p>

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				support providing new exhaust rates for electric and gas ranges. These rates are speculative and based on limited data. ASHRAE is still working on developing range hood metrics regarding capture efficiency. Wait for that work to be done and published in 20204 for ASHRAE 62.2.
October 14 Oral Testimony				
Jessica Zimmerle	Earth Ministry/ WA Interfaith Power & Light	WSEC-R: Heat pump proposals (And IMC/IRC ventilation)	Support	Urge adoption. Indoor air quality is two to five times more polluted than outdoor air. We want to see more clean air in our homes.
Lisa Parshley	Olympia City Council & Climate Solutions	IMC Ventilation	Support	Urge you to adopt the requirements for heat pumps and increased ventilation for gas stoves. Adding new buildings to the gas distribution [infrastructure] will lock in carbon and methane emission. We spend \$65 billion dollars due to poor indoor air quality from burning natural gas. It's not just climate change, it's about a sense of equity.
Pam Clough	Environment WA	WSEC-R: Heat pump proposals (And IMC/IRC ventilation)	Support	Reports have shown that homes with gas stoves have significantly higher nitrogen dioxide levels. Just one hour of cooking can produce nitrogen dioxide levels that would be illegal if found outdoors.
Caitlin Krenn	WA Environmental Council	WSEC-R: Heat pump proposals (And IMC/IRC ventilation)	Support	There is no reason that homes built today should lock residents into costly remodels or years of breathing toxic fumes from natural gas furnaces and water heaters and gas stoves.

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Cristina Mateo		WSEC-R: Heat pump proposals (And IMC/IRC ventilation)	Support	Urge adoption to move away from methane and de-incentivize gas cooking. Lower income households are at a higher risk of exposure to gas stove pollution due to unit size. Strengthening energy codes minimizes energy wasted and lowers bills.
Devon Kellogg		WSEC-R: Heat pump proposals (And IMC/IRC ventilation)	Support	In favor of the heat pump and range ventilation proposals. As an asthma sufferer, turning on the gas furnace can bring on an attack. The cost of standardizing heat pumps and fan installations in new construction is negligible with the cost of retrofits to protect basic health.
Kevin Duell		IRC/IMC 062/063	Oppose	Should be modeled after a national standard, and both ASHRAE and ASTM are still working on that standard. Wait until they are done and keep the 2018 table.
Sarah Moore		Heat Pump proposals (and IMC/IRC ventilation)	Support	City Council member from Burien. Urge adoption. Purchased a new stove with a defect. When replaced, realized nighttime headaches were due to the gas stove.
Gordon Wheat		Energy Code Building Electrification	Support	Houses are being built tight and this doesn't allow indoor air pollution to escape without turning on a vent. This is an important safety measure. Decreasing the number of gas stoves reduces health problems.