

## Group 2 IMC/IFGC Public Testimony Received

The final adopted rule can be found at

[https://sbcc.wa.gov/sites/default/files/2023-01/2021%20IMC\\_CR103\\_combined.pdf](https://sbcc.wa.gov/sites/default/files/2023-01/2021%20IMC_CR103_combined.pdf)

From	Comment/Subject	Response
<b>Written Testimony</b>		
<a href="#">Affordable Housing Advocates</a>	We, the undersigned affordable housing advocates, service providers and developers write to urge you to adopt the proposed residential building code updates. In particular, <b>we strongly support</b> the requirements for heat pump systems in new homes and <b>stricter ventilation for gas stoves.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Donna Albert</a>	<b>Please implement the proposed code updates that require</b> highest efficiency heat pumps for space and water heating, and <b>greatly improved ventilation for kitchens that use fossil gas (also known as natural gas).</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">America is All In Coalition</a>	We, members of the America is All In coalition and citizens of Washington state's broader community, urge you to adopt the full package of proposed residential building code updates put forth for public comment. <b>We strongly support the requirements for</b> heat pump systems in new homes and <b>stricter ventilation for new homes with gas stoves.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Andrews Mechanical</a>	I would ask <b>not to approve</b> or move forward with Mechanical code 605.5	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions from

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	only allowing <b>Merv 13 air filters</b> to be installed per the code.	21-GP2-098 which are reflected in Option 1 for Section 605. The Council felt it was in the best interest for the health, safety and welfare of Washington residents to require filtration of both outside air and recirculated air to eliminate pollutants and contaminants. Electronic air filters are not precluded by this requirement, as long as they can provide equivalent to MERV 13 filtration, and other options may be approved by the local building department.
<a href="#">Larry Andrews</a> <a href="#">09/30/22 oral testimony</a>	<p>I'm speaking about the code about <b>MERV13 air filters and am speaking against this code.</b> I believe that F300 electronic air cleaners do just as good a job as a MERV13 and I believe that this amendment would violate RCW 19.27.020(3) to permit the use of modern technical methods and devices for improvements. <b>I encourage you to at least add electronic air cleaners to this proposal or remove the proposal.</b></p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions from 21-GP2-098 which are reflected in Option 1 for Section 605. The Council felt it was in the best interest for the health of Washington residents to require filtration of both outside air and recirculated air to eliminate pollutants and contaminants. Electronic air filters are not precluded by this requirement, as long as they can provide equivalent to MERV 13 filtration, and other options may be approved by the local building department.</p>
<a href="#">Association of Home Appliance Manufacturers</a>	<p>As SBCC is aware, AHAM has a range hood verification and listing program. Indeed, SBCC's proposed text already lists AHAM as an approved listing directory for range hoods (Clause 403.4.7.3.1). <b>There are other clauses though, where for the sake of clarity, AHAM's directory should also be included in the text.</b> These include Clause 403.4.7.3.1.2 and subsequent clauses where an alternate range hood listing service, HVI, is included.</p>	<p>The State Building Code Council adopted the proposed rule with the suggested modification to include the AHAM range hood directory in the approved products citation. The Council felt this was a good clarification.</p>

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<a href="#">Deborah Barbee</a>	<b>I oppose 21-GP2-062 and 21-GP2-063.</b> Let each homeowner make their own choice.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. Please note that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.
<a href="#">Jerry Bird</a>	<b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Kellen Bond</a>	<b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<b>Ian Casey, Northwest Natural</b> <a href="#">09/30/22 oral testimony</a>	I'm here to provide comment on the range hood proposal that would increase the exhaust flow rate required at electric and combustion ranges. The recommended exhaust rates in this proposal are speculative, based on limited lab measurements and modeling. Since the flow rates prescribed in this proposal lacks supporting data on their effectiveness, <b>our recommendation is that Council remove these changes to range hood exhaust rates until nationally recognized organizations like ASHRAE and ASTM develop</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.

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	<b>standards</b> based on lab testing that produces an effective exhaust that addresses IAQ issues.	
<a href="#">Tracy Ceravolo</a>	Since I am not able to attend tomorrow's meeting on gas stoves, I am sending in my written testimony... why on Earth are we cooking with an open flame inside our homes in the 21st century?? It is the definition of crazy.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Climate Solutions</a>	Climate Solutions strongly urges the State Building Code Council (SBCC) to adopt the full package of proposals; specifically, <b>we are writing in strong support of</b> the requirements for heat pumps for space and water heating, and <b>stricter ventilation requirements for gas stoves.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<b>Randall Cooper, AHAM</b> <a href="#">09/30/22 oral testimony</a>	<b>Add AHAM as an alternate listing source for compliant exhaust hoods in IMC 403.4.7.3.1/IRC M1505.4.4.3.1</b>	The State Building Code Council adopted the proposed rule with the suggested modification to include the AHAM range hood directory in the approved products citation. The Council felt this was a good clarification.
<a href="#">WM Douglas</a>	<b>I OPPOSE proposals</b> 21-GP2-073, 21-GP2-065, 21-GP2-066, 21-GP2-062, <b>21-GP2-063</b> because they will have the effect of banning natural gas in new homes, taking away Energy Choice.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. Please note that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.
<a href="#">Earth Justice</a> Please see the attached document from 718	<b>I'm writing to urge you to approve the proposed updates</b> to the Washington State residential energy code to require that new homes be built	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for

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community members on behalf of Earthjustice.	with high efficiency heat pumps to heat and cool our spaces and water, and <b>with increased ventilation for kitchens that burn polluting gas.</b>	gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Brian Emanuels</a>	<b>Therefore, I strongly urge the SBCC to adopt</b> the WSEC-R proposal to require heat pumps, and <b>increased ventilation for gas stoves.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Environmental and Racial Justice Advocates</a>	We, the undersigned environmental and racial justice advocates, stand in solidarity to urge you to move the full package of residential energy code proposals forward to public comment. This package of proposals takes steps to address both the efficiency and the use of fossil fuels in our newest homes. Requiring clean heat pump technologies addresses indoor and outdoor air pollution and will ensure that we are building healthy, resilient, and affordable homes that increase quality of life for impacted and overburdened communities.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Environment WA</a>	I'm writing to urge you to <b>approve the proposed updates</b> to the Washington State residential energy code to require that new homes be built with high-efficiency heat pumps to heat and cool our spaces and water, and <b>with increased ventilation for kitchens that burn polluting gas.</b> This request is reinforced by the 252 Environment Washington supporters that signed onto	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.

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	this letter of our support for this request, which you can find attached.	
<a href="#">Kane Fenner</a>	I am writing today on behalf of Zaxium to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Casey French</a>	I am writing today on behalf of Clark Construction Inc to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package. F	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Mark Hedin</a>	I am writing today on behalf of H & S Quality Construction Inc. to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Sue-Ann Heutink</a>	<b>I OPPOSE proposals</b> 21-GP2-073, 21-GP2-065, 21-GP2-066, 21-GP2-062, <b>21-GP2-063</b> because they will have the effect of banning natural gas in new homes, taking away Energy Choice.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. Please note that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.

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<b>Rebecca Hoshaw</b> <a href="#">09/30/22 oral testimony</a>	<p>I am also a student doctor at Pacific Northwest University's College of Osteopathic Medicine and I'm training to provide optimal patient care to rural underserved and vulnerable individuals. Establishing a strong ventilation, energy could mean setting a high standard for clean energy in the home and in effect, setting a high standard for the health and equity of the community, which is able to augment the ability of individuals to live a life where they can be more present in family units and actively engage in their community circles, free from the burden of pollution-related health problems. <b>Today, I strongly encourage you to adopt these updated ventilation proposals.</b></p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<b>Anna Janecek</b> <a href="#">09/30/22 oral testimony</a>	<p>Today we have the opportunity to follow science and take distinct action that will directly improve the health of families across the State. As pediatricians, I will not be quiet, and we will not be quiet about the health of our patients. <b>I urge you to adopt the updated ventilation requirements</b> for the health of all Washingtonians, especially our most vulnerable population, children.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<a href="#">Tyler Jennings</a>	<p><b>I OPPOSE proposals</b> 21-GP2-073, 21-GP2-065, 21-GP2-066, 21-GP2-062, <b>21-GP2-063</b> because they will have the effect of banning natural gas in new homes, taking away Energy Choice.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. Please note</p>

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		that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.
<a href="#">Devon Kellogg</a>	I'd like to describe for you what life is like as an asthma-sufferer on a budget in an older, gas-serviced home without A/C. During our now standard summer heat waves, my family and I rely on opening the windows during cooking and at night to cool off and ventilate our home. Faced with increasingly warm nights and smoke from fires, our home becomes intolerable to live in. Add a gas stove in the mix, and the indoor air becomes toxic – and I suspect how I ended up with asthma in the first place. It gets so bad at times, that my hands and feet swell up and my breathing becomes labored just walking through my own home. The code proposals help address these health and cost concerns and are necessary to prevent more harmful warming effects. We can overcome any technological challenges much more easily than we can overcome the increasing health and cost impacts of climate chaos!	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Allen Ketelsen</a>	<b>I urge the SBCC to remove proposals 032, 058, 059, 060, 062, 063, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Randall King</a>	I am writing today on behalf of Kitsap Building Association to voice concerns over the Group 2 code package	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The



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	currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Ray Klein</a>	I am writing today on behalf of Zaxium, a commercial property owner and developer, to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Karyn Kline</a>	<b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<b>Jonny Kocher, RMI</b> <a href="#">09/30/22 oral testimony</a>	RMI is a climate policy nonprofit working to accelerate the clean energy transition. <b>Today, we encourage the State Building Code Council to pass all proposals today, especially the science-based IRC and IMC range hood proposals</b> requiring differentiated ventilation requirements for gas stoves. [Citation of EPA and LBNL studies]. I highly encourage the State Building Code Council to pass the science-based proposals which will improve the health of Washingtonians.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.

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<a href="#">Chris Lavery</a>	I have been reading and hearing a lot about an update to the state energy code that <b>would ban the use of natural gas in new homes for cooking and heating purposes</b> . . . Please take this all into consideration and <b>do not ban the use of natural gas</b> .	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. Please note that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.
<a href="#">Tom Lawrence</a>	<b>I OPPOSE proposals</b> 21-GP2-073, 21-GP2-065, 21-GP2-066, 21-GP2-062, <b>21-GP2-063</b> because they will have the effect of banning natural gas in new homes, taking away Energy Choice.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. Please note that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.
<a href="#">Local Elected Officials</a>	We, the undersigned local elected officials, write to <b>strongly urge the SBCC to</b> build on your excellent work updating the Washington state commercial energy code and now <b>adopt the proposed updates</b> to the residential energy code for new construction, which similarly align with our state and local climate and sustainability goals. Specifically, we strongly support the requirements for heat pump systems and <b>stricter ventilation for gas stoves in new homes</b> , which will reduce indoor and outdoor air pollution and ensure that we are building healthy, resilient, and affordable homes, by eliminating gas appliances, particularly for space and water heating, which account for the	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.

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	majority of pollution and carbon emissions from our building sector.	
<a href="#">Cory Luttermoser</a>	I am writing today on behalf of Moser Inc. an HVAC company for 25yrs located in Spokane, WA to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals 032, 058, 059, 060, 062, 063, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Mescha Manietta</a>	I am writing today on behalf of Kitsap Building Association to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals 032, 058, 059, 060, 062, 063, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Robert Marino</a>	I strongly encourage the Council to adopt the whole package of WSEC-R code proposals. The gas stove in our home puts my children at over a 40% greater risk of developing symptoms of asthma.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">James Mayther</a>	<b>I urge the SBCC to remove proposals 032, 058, 059, 060, 062, 063, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package or be passed at a later date.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Ted McCamnant</a>	<b>I OPPOSE proposals 21-GP2-073, 21-GP2-065, 21-GP2-066, 21-GP2-062,</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for

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	<b>21-GP2-063</b> because they will have the effect of banning natural gas in new homes, taking away Energy Choice.	increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. Please note that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.
<b>Mike Moore, Broan-NuTone</b> <a href="#">09/30/22 oral testimony</a>	[Citing the work done on California's Title 24, and HVI and LBNL studies on range hoods] So, you know this is all traceable, and <b>I would just encourage the Council to take the lead in this and move forward with these proposals.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">National Propane Gas Association</a>	062_Section R403.6_IRC [and 063_Section 403.4.7_IMC]  This proposal to modify Table M1505.4.1(1) and introduce new requirements for kitchen range hood ventilation rates and capture efficiency is premature in the sense that there is no information provided on how the airflow rates in proposed Table M1505.4.4.3.2 were arrived at. The air flow rates and capture efficiencies proposed do not appear in the 2022 edition of ASHRAE 62.2 or any other cited reference that we could find. In addition, there is a reference to ASHRAE 62.2 proposed for Chapter 15 but there is no actual mention of that standard in the proposed code text. Due to the seemingly arbitrary approach to specifying kitchen range hood ventilation rates and capture efficiencies, <b>we urge the Washington</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.  The capture efficiencies and flow rates were based on a Lawrence Burkley National Lab study for California and represent efficiencies that produce an average ppb that does not exceed the EPA maximum threshold for NO <sub>2</sub> and PM <sub>2.5</sub> . ASHRAE is currently working on integrating capture efficiency into an ASHRAE/HVI test standard and ASHRAE 62.2.

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	<b>State Building Code Council to reject these proposed changes.</b>	
<a href="#">Natural Resources Defense Council</a>	Please accept this comment from 549 Washington State members and online activists of the Natural Resources Defense Council (NRDC) <b>urging you to support the proposed new requirements</b> which would ensure that all new residential buildings in Washington use ultra-efficient electric heat pump systems, <b>have proper ventilation for gas stoves</b> , and that single and two-family homes and townhomes use electric water heating systems	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Wendy Nearhoff</a>	I am writing today on behalf of Nexus Electric to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Justin Nimick</a>	<b>Vote to remove the costliest proposals</b> (032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091) from the final Group 2 code package. At a time when Washington is already pricing 85% of families, we simply cannot afford to pass these codes.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">NW Natural</a>	<b>Proposed Code Language</b> – Based on IMC Table 403.4.7.3 <b>Delete proposed Table 403.4.7.3 and instead reference</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for

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	<b>previous table</b> for minimum exhaust rates, (Table 403.4.7	gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">David Perk</a>	<b>We strongly support the requirements</b> for heat pump systems in new homes and <b>stricter ventilation for gas stoves to protect indoor air quality and health.</b> In the face of the climate emergency, it is critical that officials at all levels of government pass the policies needed to reduce emissions, protect our communities from further harm, and foster resilience.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<b>Scott Peterson, Northwest Gas Association</b> <a href="#">09/30/22 oral testimony</a>	Discussing the gas stove ventilation proposals. <b>I oppose the bias against natural gas stoves,</b> and when looking at cooking there are potentially health risks from cooking without ventilation, using anything, gas stove, electric stove, a fire, whatever. There is no science indicating that gas stoves are particularly dangerous, so we encourage strong ventilation requirements for cooking for all sources to protect everyone	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Jeff Philipps</a>	<b>Please vote to remove the costliest proposals</b> (032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091) from the final Group 2 code package. At a time when Washington is already pricing 85% of families, we simply cannot afford to pass these codes.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Todd Phillips</a>	Department of Health in favor of ventilation proposal. <b>In consideration of public health protection across</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The

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	<p><b>Washington State, we urge the Mechanical, Ventilation and Energy Committee to support the proposed ventilation filtration proposals 86 and 98 as modified and adopted by the Mechanical Ventilation technical advisory group.</b> Doing so is critical to protect public health, especially in Washington's most vulnerable communities. For some years now we have been encouraging the use of MERV 13 filters to filter outside air that may be contaminated by wildfire smoke, traffic related air pollution, wood burning, etc. The COVID-19 pandemic has brought to the everyone's attention the contribution of poorly filtered and ventilated spaces to controlling respiratory diseases. Recirculated air in public buildings needs to be filtered by at least MERV 13 filters.</p>	<p>majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<p><a href="#">Dana Pieze</a></p>	<p>I am writing today on behalf of Dana's Heating, Inc. to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b>, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<p><a href="#">Stasie Pike</a></p>	<p><b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b>, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>

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<a href="#">Jerad Rains</a>	I am writing today on behalf of Rogue Fabricators Inc. to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Gary Redman</a>	<b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Claire Richards</a> <a href="#">09/30/22 oral testimony</a>	I'm a neuroscientist and here on behalf of the Washington Physicians for Social Responsibility. <b>I'm here to support strengthening the building code to have high ventilation rates on stoves.</b> This will improve the health of Washingtonians and reduce health disparities in Washington State. The way to reduce health disparities is to control pollution at the source. This means that strengthening the ventilation requirements in buildings is a very important way to reduce health disparities and allow children to reach their full potential, regardless of what zip code they grow up in.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Clair Richards</a>	“...Numerous studies have shown that nitrogen oxides, a very dangerous pollutant that is released during the burning of gas stoves, is associated	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for



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	with all-cause, respiratory, and cardiovascular mortality.”	gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">RMI &amp; WPSR</a>	As such, <b>we are writing to express our support for the following proposed code changes</b> included within the CR-102 filing for the International Mechanical Code: Differentiated Ventilation Proposals 21-GP2-062 and <b>21-GP2-063</b> This letter addresses the following points: 1) Gas stoves release unique pollutants beyond those from electric stoves 2) A robust body of evidence demonstrates the link between gas stoves and health impacts 3) The health evidence cannot be ignored in the building code process 4) There is precedent for strengthening ventilation requirements based on health and science	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Kevin Russell</a>	I am writing today on behalf of Kevin Russell Construction to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b> , 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.
<a href="#">Andrea Smith</a>	21-GP2-062 and 21-GP2-063: Increased Range Hood Ventilation  Recommended Technical Modifications: <b>Recommend 160 cfm across all range hoods, not dependent on fuel type of range.</b>	The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the higher exhaust capacity of 250 cfm for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution and did not

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		feel it should be lowered to the same rate of 160 cfm required for electric ranges.
<p><b>Andrea Smith, BIAW</b>  <a href="#">09/30/22 oral testimony</a></p>	<p><b>We're here today in opposition to the range hood ventilation proposals.</b>  Specifically, we'd like to see a uniform standard applied for all ranges and not singling out ranges of specific fuel types.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution. The Council felt the higher exhaust capacity of 250 cfm for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution and did not feel it should be lowered to the same rate of 160 cfm required for electric ranges.</p>
<p><a href="#">BIAW Signatures</a></p>	<p>We, the undersigned, hereby urge the Washington State Building Code Council to <b>remove proposals</b> 21- GP2-032, 21-GP2-058, 21-GP2-059, 21-GP2-060, 21-GP2-062, <b>21-GP2-063</b>, 21-GP2-065, 21-GP2-066, 21- GP2-079, 21-GP2-080, 21-GP2-089, and 21-GP2-091 from the final Group 2 building code package.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<p><a href="#">Kevin Smith</a></p>	<p><b>Please vote to remove the costliest proposals</b> (032, 058, 059, 060, 062, <b>063</b>, 065, 066, 079, 080, 089, and 091) from the final Group 2 code package. At a time when Washington is already pricing 85% of families, we simply cannot afford to pass these codes.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<p><a href="#">Caleb Stapp</a></p>	<p>I am deeply concerned about the proposed building code updates that would make it more expensive and difficult for Washingtonians to buy homes. I serve on the city council in</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and</p>

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	<p>Deer Park, WA and have attempted to lower permitting costs and regulations so that more of my neighbors can afford home ownership - and now there's an unelected board prepared to exceed their authority while increasing the heavy burden new homeowners must shoulder.</p> <p><b>I oppose 21-GP2-062 and 21-GP2-063.</b> Let each homeowner make their own choice.</p>	<p>health impacts of nitrogen oxides air pollution. Please note that gas stoves are still allowed by the code; their installation would just require a hood with a stronger exhaust fan.</p>
<p><a href="#">Caroline Traube</a></p>	<p>Regarding the currently open Group 2 public comment, <b>please ensure the inclusion and adoption of the recently published ASHRAE Standard 15.2 in the 2021 Washington State Mechanical Code</b> and the 2021 Washington State Residential Code to align with HB1050.</p>	<p>This provision was not added to the code at this time. In light of the fact that the standard was not published in time to be included in the CR102 and reviewed as part of the proposed code, the Council decided to delay the inclusion and adoption of ASHRAE 15.2 until the other standard cited in HB1050, UL 60335-2-40 Edition 4, which is scheduled to be published in late December.</p>
<p><a href="#">Eric Vander Mey</a></p>	<p>Proposed Modification:</p> <p><b>Public Comment on Log #21-PG2-019 See recommendations to clarify the requirements for utility transformer exhaust locations.</b> Referring to the NFPA 70 is not clear and enforceable code language as this section is in regard to naturally ventilated transformer vaults. So it is unclear if this even applies to mechanically exhausted transformer vaults. Additionally, the NFPA language is very general with terms like “as far as possible from” in 450.45 (A).</p>	<p>The State Building Code Council adopted the proposed rule with the modification suggested to include additional language from NFPA 70 in the amendment to Section 501.3.1. It was felt this was a good clarification to the proposed rule.</p>

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<a href="#">Andrea Velarde</a> <a href="#">09/30/22 oral testimony</a>	<p>I'm a medical student at PNWU training to become a doctor with a goal of serving underserved communities. <b>I strongly urge you to adopt this proposed update to increase ventilation requirements.</b> Increasing ventilation requirements allows for toxic fumes produced by gas powered appliances to be more effectively removed from homes which will protect our community's health.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<a href="#">Corey Watson</a>	<p>I am writing today on behalf of JK Monarch Fine Homes to voice concerns over the Group 2 code package currently up for consideration. <b>I urge the SBCC to remove proposals</b> 032, 058, 059, 060, 062, <b>063</b>, 065, 066, 079, 080, 089, and 091 from the Group 2 building code package.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>
<a href="#">Steve Yester</a>	<p><b>Please vote to remove the costliest proposals</b> (032, 058, 059, 060, 062, <b>063</b>, 065, 066, 079, 080, 089, and 091) from the final Group 2 code package.</p>	<p>The State Building Code Council moved forward with the adoption of the 2021 IMC, including the provisions for increased ventilation requirements for gas stoves. The majority of the Council felt the additional exhaust capacity for gas stoves was warranted in light of the cited studies and health impacts of nitrogen oxides air pollution.</p>