

ANDREWS MECHANICAL, INC.

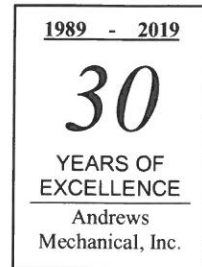
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September 24, 2019

Response Regarding Proposal R402.4.2.1 Gas Fireplace Efficiency

We are against this proposal for the following reasons.

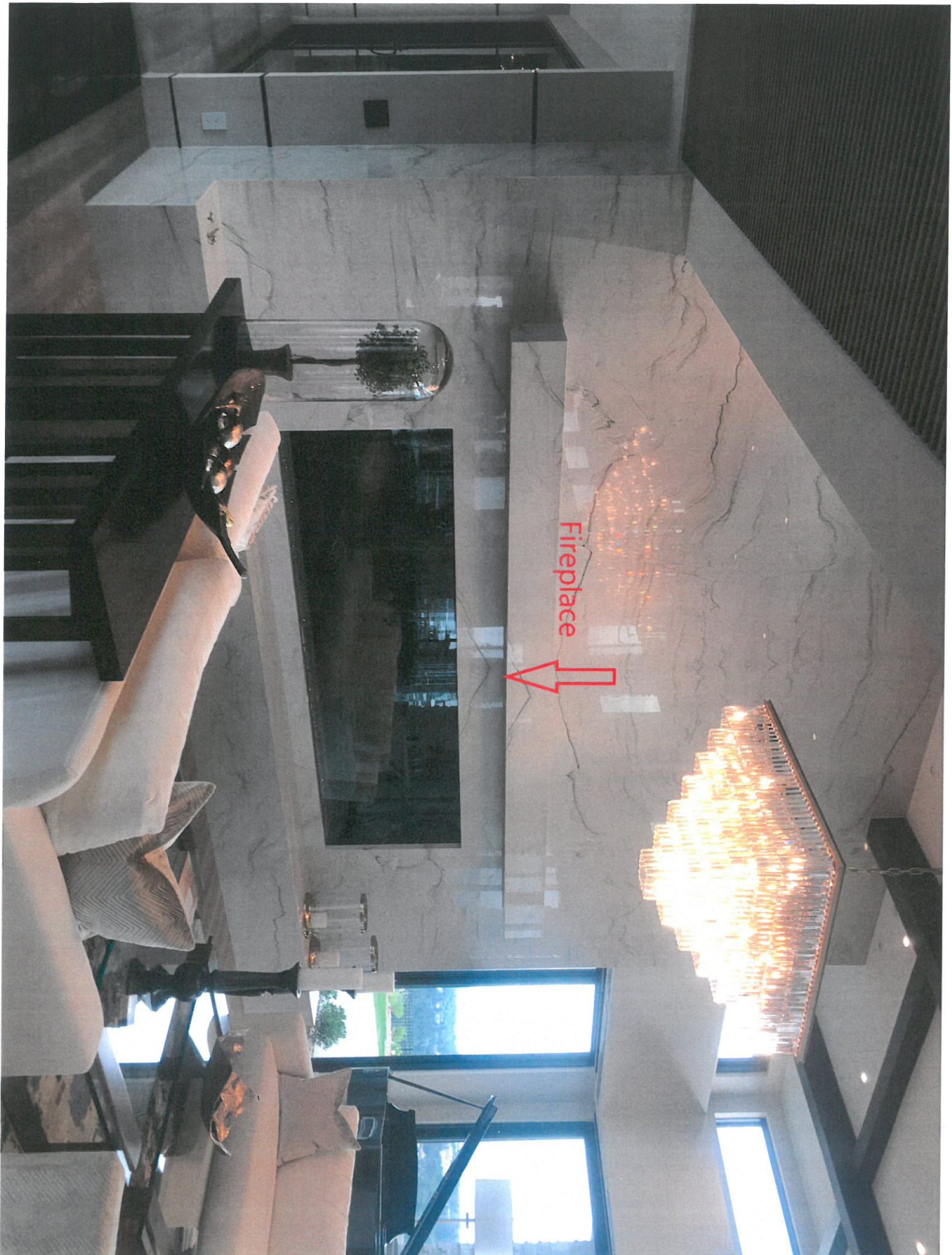
- 1) Remove this requirement due to the fact that many gas fireplaces are used only for their aesthetic or decorative appeal and are used in the summertime. If such fireplaces were made to this new standard, I as a mechanical contractor would have to design an A/C system to remove all of the heat. We are already doing this with what we have now. Some of these decorative fireplaces are 10' long (see enclosed pictures of these fireplaces), if they were that efficient, you would be required, at least, to install a 20-ton A/C to cool the place, otherwise it would be too hot for the people to stay indoors and enjoy their fireplace in the summertime.
- 2) People work hard all their lives to get fireplaces like these in their homes and this proposal would make it even harder for these people to get what they want. This is not right.
- 3) The proposal should have been for sole source heat for homes.
- 4) This would stop all gas log installations in brick chimneys. This is a large part of aesthetic businesses and people would use wood instead of gas in their fireplaces which would increase the carbon footprint.
- 5) This would open a class action lawsuit for the restriction of trade to the state building code counsel for such rule.
- 6) Go north to B.C. and you see flame coming out of the ground all over the place. More gas is burnt off in one day than all of Washington uses in a week.
- 7) It is proposals like this that spark the conversation of dividing a Washington state into two states and could turn it into a reality.
- 8) When you increase the efficiency of the fireplace the flame becomes blue in color and you lose the yellow in the flame. People want the look of wood fire with gas that is one reason why the efficiencies are what they are.
- 9) Then what about propane fireplaces, they are not target here, they put out more carbon than natural gas fireplaces.

Edwin Larry Andrews II



Fireplace





Fireplace

