

David S. Wall
P.O. Box 756 Newberg, Oregon 97132; [408-287-6838]

May 14, 2021

To: Senate Committee on Energy and Environment; [others]

Re: I OPPOSE [HB 3227 A]...The timeline for implementation is not acceptable.

I support and Thank those responsible for their efforts to save the planet, really I do.

Excerpt from [HB 3227 A] states,

"**SECTION 1.** Section 2 of this 2021 Act is added to and made a part of ORS chapter 455.

SECTION 2. The Department of Consumer and Business Services may not prohibit in the state building code the **use of refrigerants listed as of January 1, 2022**, under regulations adopted under 42 U.S.C. 7671k as safe alternatives to Class I and Class II substances if the safe alternatives are installed in accordance with applicable rules or regulations."

I am concerned as to the timeline as a function of transition to the use of the proposed alternatives.

The transition to the "alternatives" to Class I and Class II refrigerants, solvents and other materials suspiciously absent in [HB 3227 A] may pose significant economic harm to the business entities that currently employ their use.

The time of ""January 1, 2022" is a few scant months away and therefore there is no appreciable transitional period to minimize material economic disruptions.

With reference to refrigerants, the operational life-cycle of household refrigerators is significantly lessened with some of the mandated refrigerants. This causes more production of household refrigerators at great cost to consumers as well as great and unacceptable costs to the detriment of the environment in a number of ways.

The extension of the timeline from "January 1, 2022" would be a reasonable accommodation for compliance.

Consultation with the industries concerning the transition time to replace Class I and Class II materials in their current applications would be the more prudent approach to satisfy compliance with [HB 3227 A].

Respectfully submitted

/s/ David S. Wall

///
///
///