

September 25, 2014

Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Sir or Madam:

Gerding Edlen is one of the nation's leading investment management, asset management and development firms and we focus on building high quality and sustainable properties that add value to the communities in which we build. Our Principles of Place guide us in the creation of vibrant, inspiring and sustainable places. Our projects are typically urban office, apartment and mixed-use properties in markets such as Portland, Seattle, San Francisco, Chicago and Boston. We have developed a total of 63 registered and certified LEED projects, including 13 LEED Platinum buildings.

As a leader in sustainability, we stay abreast of new developments and have not been timid over the years about trying new, cutting-edge technologies and design approaches in our buildings. As it pertains to refrigerant in building systems, most of our development experience has been with R-410A equipment. We have only recently taken on acquiring existing properties. As such, we now own a building in Seattle that has over 100 2-ton heat pumps, many of which are still using R-22 refrigerant. While we know that R-410A equipment delivers energy efficiencies with a higher SEER rating, we also know that R-410A refrigerant's global-warming potential (GWP) is 14% higher than R-22 and it operates at higher pressure, which dramatically increases the potential for leaks. Both options have serious environmental drawbacks.

After reviewing case studies of a number of installations across the country as well as results from equipment owned and operated by one of our trusted mechanical contactor partners, we became convinced that the new Bluon Energy refrigerant, Bluon TdX20 was something we should try. We have since replaced two R410-A units in two different buildings, our headquarters office in Portland, OR and a commercial office building we

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own in Seattle, WA. Our field tests are demonstrating an average 20% reduction in energy consumption. For this reason, we are considering replacing a large number of heat pumps currently operating with R-22 refrigerant, in addition to those operating with R410-A.

Bluon TdX 20 allows building owners to comply with environmental mandates, save energy, save money and prolong equipment life. Bluon Energy is awaiting approval of its TdX SNAP application by the EPA. We respectfully ask the EPA's consideration of the application to help companies like ours accelerate the phase-out of R-22 refrigerant.

Sincerely,



Renee Loveland
Sustainability Manager

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