



October 8, 2014

Environmental Protection Agency  
1200 Pennsylvania Avenue NW  
Washington, DC 20460

Re: Need for alternative options to R-22 & R-410A, Bluon EPA SNAP Application

To Whom It May Concern:

Redside is a real estate investment and services firm based in Portland, Oregon. Redside acquires, develops and manages commercial and multi-family assets with specific expertise in high-performance, energy-efficient green buildings. We renovate, manage and transform properties to standards that are ecologically responsible, energy efficient and economically profitable.

Redside has sought to replace R-22 in all of the buildings we develop and manage. While the phase out of R-22 has helped us justify the installation of R-410A equipment in new buildings and substantial renovations that include new HVAC systems, R-410A remains a less than ideal option for the existing buildings we operate with R-22 equipment.

More alternatives to R-22 are needed in the market.

We can seldom justify the replacement of R-22 equipment with R-410A during the normal operational phase of a building. Within existing, stabilized buildings, capital equipment like HVAC systems are often repaired and refurbished rather than replaced. It is not until the recapitalization of a building, which may not occur for 10 or more years, when a HVAC system replacement is contemplated. Despite multiple attempts to do so, we have still been unable to justify the replacement of R-22 equipment from the 1960s in one of our buildings.

In May, Redside replaced 120 pounds of R-22 refrigerant with Bluon TdX 20 in a medical office building. R-22 was replaced in all units including a 50-ton rooftop packaged unit. So far, have seen about a 20% reduction in heating and cooling energy consumption.

Based on this, Redside is planning to use Bluon TdX 20 across our entire portfolio once EPA approves Bluon Energy's SNAP application. This will allow us to work with our local energy efficiency program, Energy Trust of Oregon (ETO), to pursue incentives. We hope this work with ETO will facilitate widespread adoption of this straightforward and simple R-22 replacement option.

We have found Bluon TdX 20 to be the responsible alternative to R-22. Not only does it allow our building owners to comply with environmental mandates and save energy, it is easy and inexpensive to do so.

We respectfully ask the EPA's consideration of Bluon Energy's Significant New Alternatives Policy (SNAP) application to help companies like ours accelerate the final phase out of R-22 refrigerant.

Sincerely,

Ben Gates, Development and Sustainability Director

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