Hello,

We are writing to ask you postpone your decision on the Building Code Amendment for Energy Credit. The current proposed Energy Credit changes may have unintended consequences. We want to support smart code changes and wonder whether this proposal is the way to get the intended results.

We will use a current project as an example of how these changes impact builders and developers.

The project is comprised of 26 rowhouse and townhome units, over 4 sites. The SF of each unit ranges from 1257 SF to 1640 SF, with a combination of garage and surfaced parked units. All 4 sites are functionally tied together which results in energy code taking the highest SF of all units on site. Because of this, we no longer meet the requirements for Small Dwelling Unit (4.5 credits proposed), are not R-2 construction (4.5 credits proposed), and are not over 5,000 SF (7 credits proposed), resulting in Medium Dwelling Units (6 credits proposed).

In the current code we attempted to remove gas but struggled to then meet the existing 3.5 credits of Medium Dwelling Units. We then looked into HRV/ERV and other water heater options. This cost +$2500/unit just for the HRV/ERV. Also, switching from gas meant losing the compact tankless hot water heater (1'x2.5'x3.5') in exchange for either a (3'x3'x5'-6') standard hot water heater, or change to a hybrid (4'x4'x7'-8') that also cost $2500. We would have paid more, and with some tight units, would have had to redesign the floor plans to fit in the width and height of the water tanks. This would have lost critical usable space for the buyer. There was also the extra cost of a new appliance package to compete with gas. Instead, we switched back to gas. The proposed gas credit has been reduced, along with two other credits we typically use. We are aware of the proposal to remove gas altogether, which would reduce credit options even more in the proposed code.

With the new proposal of energy credits, our 26 unit project would go from 3.5 credits, to 6 credits required. The 3.5credits we met, would be reduced to 1.5 with no gas option, or 2.5 with gas as an option. We would then be required to make up 3.5-4.5 credits. Below are the costs associated with this add.

1. Efficient water heater (ERV) = +$2500/unit
2. Efficient Building Envelope (special package windows to meet U value) = $3000/unit
3. Efficient Building Envelope (increased insulation, framing) = $1500/unit
4. Air Leakage + Efficient Ventilation (AeroBarrier) = $1-2/SF. $1300-2800/units = $2050/unit

Total = $9050/unit.

With 26 units in this example, that would be $235,300/project.

If 2,393 people are priced out of new homes for every $1000 added cost to project, that would be 563,072 people priced out of new homes on this project alone.

We support cleaner and smarter options for building. We also support providing housing in Seattle. The current proposal seems to push even more people out of housing options. We strive to create market options so that housing is not just for the elite. We fear this current proposal has not been fully vetted for what the true results will be.

We ask you not to approve the current proposal as it and instead take time to truly examine other options that may result in even better solutions for all.

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