



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

1011 Plum Street SE • PO Box 42525 • Olympia, Washington 98504-2525 • 360-725-4000
www.commerce.wa.gov

September 26, 2019

Doug Orth, Chair
Council Members
Washington State Building Code Council

RE: Comments on the proposed changes to the IRC, Appendix Q – Tiny Houses.

Mr. Orth and Council Members,

I recommend that the council vote against adoption of Appendix Q—Tiny houses. It is generally flawed and requires reconsideration by the appropriate technical advisory groups. In particular, I am concerned about the proposed language for energy conservation in AQ104. The energy code tag was not involved in the development of the current draft and it has not been reviewed by experts in this field.

While Commerce supports the intent to provide a simple option for very small homes, this is not a valid approach. It is missing too many administrative and energy conservation features to create a functional energy code. My critique follows:

AQ104.1 Air leakage testing. The air leakage test method is inconsistent with the WSEC method for single family homes. It is also needlessly complex.

AQ104.2 Alternative compliance.

- This section references the IECC, without consideration for the WSEC. This is inconsistent with existing code Washington code adoption practices.
- This section adopts IECC code tables without consideration of the charging sections of the code. Even if you change these references from IECC to WSEC tables, it is missing too many elements required for compliance. Tables without the supporting sections are not sufficient. What inspections are required? What's a U-factor? Are windows required to be tested and labeled? Do heating system need controls? If it's not wood frame construction, then what?
- This section requires "Solar, wind, or other renewable energy source supplies not less than 5 watts per square foot of floor area for the structure". This is not a viable option for many sites.

I look forward to working on a reasonable set of amendments to the state energy code in support of providing a small housing option.

Chuck Murray
Sr. Energy Policy Specialist