



Allyson Brooks Ph.D., Director
State Historic Preservation Officer

July 14, 2021

State Building Code Council
Energy Code Technical Advisory Group (TAG)
1500 Jefferson Street SE
P.O. Box 41449
Olympia, Washington 98504
via electronic mail to: sbcc@des.wa.gov

Re: Washington State Energy Code – Commercial Code Proposals 2021 **(21-GP1-102)**
Historic Buildings

Dear Energy Code TAG:

The Washington State Department of Archaeology and Historic Preservation (DAHP), also known as the Washington State Historic Preservation Office (SHPO) is pleased to submit this letter in support of a proposed code language change in the Washington State Energy Code – Commercial Code regarding the definition and application of energy code to historic buildings (21-GP1-102). DAHP consults on thousands of historic building projects annually, and is Washington State's primary state agency with knowledge and expertise in historic preservation.

The proposed modifications, submitted by Sean Denniston, apply to sections applicable to historic buildings, and include revisions to the language that align Washington State's energy code with the International Energy Conservation Code (IECC). The language found in IECC best reflects the balance between historic preservation and energy code retrofits that has been endorsed by a wide variety of relevant field expert organizations including the American Institute of Architects and the National Trust for Historic Preservation.

The current language offers the building code official an authority to modify the code per historic preservation standards that he or she may not have the technical expertise necessary to prescribe. The proposed language revisions absolve this issue by requiring affirmation by a licensed design professional, State Historic Preservation Office such as ours, or other historic preservation authority having jurisdiction that an otherwise prescriptive energy code compliance treatment could have a detrimental impact on a building's historic features.

We strongly recommend that the SBCC Energy Code TAG adopt this proposed code change without hesitation. Should you have any questions, please don't hesitate to reach out to me directly at (360) 628-2170 or nicholas.vann@dahp.wa.gov.

Respectfully,

Nicholas Vann, AIA
Deputy State Historic Preservation Officer
Department of Archaeology and Historic Preservation

