



September 29, 2021

Chair Klein and Members of the State Building Code Council:

The undersigned organizations are writing to urge the Washington State Building Code Council (SBCC) to **move the full package of commercial energy code proposals out to public comment**. Fairness and transparency in the public process requires that the full list of proposals, vetted by the Technical Advisory Group during meetings that spanned the entire summer, be daylighted so that the SBCC will have the benefit of a robust public debate.

As the climate crisis progresses, its impacts are increasingly felt here in Washington. In the past year alone, we have seen the direct effects of climate change in the shape of unprecedented wildfires, droughts, and heat waves which have cost hundreds of lives and have had untold economic impacts across the state. In the face of the climate emergency, it is critical that officials at all levels of government pass the policies needed to reduce emissions, and protect our communities from further harm - especially low-income and frontline communities who are most at risk from the impacts of climate change. This package of proposals takes steps to address both the efficiency of our newest large buildings and the use of fossil fuels in these buildings - buildings which will be around for decades, if not longer.

By legislative statute, Washington's energy code is required to become increasingly more efficient every revision cycle so that new buildings in 2031 are 70% more efficient than those built in 2006.¹ In addition, Governor Inslee's Executive Order 14-04 directs the State Building Code Council to "achieve early and widespread deployment of energy-neutral buildings prior to the 2031 statutory requirement in RCW 19.27A.160."² Because there are only four code cycles between now and the 2031 code, it is essential that each revision maximizes what can be done to make buildings more efficient and transition away from fossil fuels. The proposals on the

¹ <https://app.leg.wa.gov/rcw/default.aspx?cite=19.27A.160>

² https://www.governor.wa.gov/sites/default/files/exe_order/eo_14-04.pdf

table help get us there; most significantly, **electric heat pumps are both much more efficient than fossil fuel options and eliminate on-site fossil fuel combustion.**

This package has had extensive vetting by the SBCC Technical Advisory Group and the undersigned organizations urge the SBCC to present the full package for a fully deliberative public comment process.

Thank you for your consideration.

Katherine Leggett, Organizer, 350 Seattle

Janeen Provazek, Volunteer, 350 Tacoma

Martha Bishop, Co-leader, 350 West Sound Climate Action

Mary Rollins, Leadership, 350 Everett

Frances Merenda, Chair, 36th LD Environmental Caucus

Dave Kozin, CFO, A&R Solar

Heidi Cody, ACE Spokescouncil Member, Alliance for Community Engagement SWWA (ACE)

Kirsten Smith, Manager - Policy & Advocacy, American Institute of Architects Washington Council

Nancy Henderson, Managing Member, ArchEcology LLC

Erin McDade, Senior Program Director, Architecture 2030

Josh Yacknowitz, Principal, Arup

Nick Caleb, Climate and Energy Attorney, Breach Collective

Iris Antman, Member, Climate Action Group at Seattle Insight Meditation Society

Don Steinke, Executive Director, Climate Action of SW WA

Deepa Sivarajan, Washington Policy Manager, Climate Solutions

Angelena Campobasso, Business Owner, Creative Native Consulting

Christopher Starkey, Owner, CSDC LLC

Jonathan Heller, President, Ecotope

Brian Stewart, Founder, Electrify Now

Brynn Furey, Clean Energy Associate, Environment Washington

Stephen Gibson, Architect/Owner, Gibson A+S

Kevin Jones, Leadership Team Member, Indivisible Vashon

Kathy Dawson, Chapter Co-chair, King County Chapter of the Climate Reality Project

Doug Tucker, Director - Industry & Government Relations, Mitsubishi Electric US

Alejandra Mejia Cunningham, Building Decarbonization Advocate, Natural Resources Defense Council

Amy Wheelless, Senior Policy Associate, NW Energy Coalition

Edward Chadd, Chair, Olympic Climate Action

R. Court Olson, Principal, Optimum Building Consultants LLC

Priya Judge, Coalition Coordinator, Power Past Fracked Gas

Sven Thesen, Founder, Project Green Home

Jeremy Smithson, CEO, Puget Sound Solar LLC

Shannon Wright, Executive Director, RE Sources

Sean Graham Armstrong, Managing Partner, Redwood Energy

Jonny Kocher, Associate, RMI

Robert Harmon, Principal, Robert K. Harmon & Company LLC

Mike Westgard, Owner/Operator, Saw & Paw

Dylan Plummer, Senior Campaign Representative, Sierra Club

Andrea Axel, Executive Director, Spark Northwest

Jerry White, Jr, Executive Director, Spokane Riverkeeper

Jon Lange, President, Sunergy Systems Inc.

Jim Purekal, Manager - Market Development & Policy, SunPower Corporation

Amanda Parrish, Executive Director, The Lands Council

Melinda Hughes, Executive Director, Thurston Climate Action Team (TCAT)

Bonnie Frye Hemphill, Director - Policy & Partnerships, UMC Inc.

Susan Saul, Conservation Chair, Vancouver Audubon Society

Kevin Jones, Board Member, Vashon Climate Action Group

Rebecca Ponzio, Climate & Fossil Fuel Program Director, Washington Environmental Council

Mark Vossler, President of the Board, Washington Physicians for Social Responsibility

Nicole Walter, Advocate, Washington PIRG

Markus Virta, Director of Business Development, Western Solar

Daniel A Welch, Owner, [bundle] Design Studio