

# **WASHINGTON FARM BUREAU**

February 24, 2022

Dear Members of the Washington State Building Code Council,

The 46,000 members of the Washington Farm Bureau urge a no vote on these two proposals which due to the adverse impacts they will have on farms and the minimal affect they will have to advance the state's climate goals.

Specifically, we oppose the following proposed code changes to the state energy code:

- [21-GP1-136](#) – Bans natural gas for commercial water heating and requires electric heat pumps for water heating.
- [21-GP1-103](#)- Requires electric heat pumps for new commercial construction or retrofits and bans the use of natural gas for commercial space heating (HVACs).

Washington Farm Bureau members are closely linked to the agricultural-related industries that rely on natural gas to provide efficient and reliable heating and hot water for warehouses, food processing plants and other facilities.

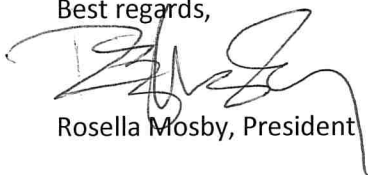
The changes being reviewed by the Council will have a real and direct financial impact on farms located across the state. Please note that 96 percent of farms in Washington are family farms. This proposal will directly raise the costs associated with these and all other farms in our state. As farmers, we cannot increase the prices of our goods due to underlying market forces. We are paid market rate, making us price takers not price makers. We are also concerned about the impact of power reliability. Natural gas provides a highly reliable alternative energy source that can be counted on during serious weather conditions when the electrical grid may be disrupted.

Compounding these factors, heat pumps are expensive and an insufficient alternative, which the code recognizes, by allowing backup resistance heaters in certain areas of the state. This redundancy requires farmers to pay upfront for two separate heating solutions at additional costs. The council has claimed these proposals will improve energy efficiency, but an adequate case has not yet been made.

As small businesses, family farms are best placed to make the choice on which energy solution better suits personal, business, and economic needs. These policies remove the ability for choice and place farmers' livelihoods in peril.

In the final analysis, natural gas use in buildings is responsible for a negligible amount of the state's greenhouse gas emissions. These policies will **not** move the needle enough to justify the added costs farmers will pay for new and redundant equipment, increased utility bills, and higher rent for employees. The idea that these policies will advance energy efficiency is inconclusive, and, we believe, unfounded.

Best regards,



Rosella Mosby, President