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**To:** Washington State Building Code Council  
**From:** Patrick Hanks, BIAW  
**Date:** 9/19/24  
**Re:** Support for Option 2 of WSR 24-16-146

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Members of the council,

The Building Industry Association of Washington (BIAW) represents 8,000 member companies within the residential construction industry.

We encourage the council to adopt Option 2 of WSR 24-16-146 which will provide more flexibility for multi-family residential dwellings across the state when it comes to space heating. This is especially important for multi-family buildings in regions of our state that experience cold winters where electric heat pumps will not perform as efficiently.

Hybrid heating options are a good option for builders and allow buildings to maximize their energy efficiency, maintain consistent heating for their residents, while reducing their electric demand at peak times during the winter. This will help reduce operating costs for building owners and residents.

The residential code recognizes these benefits and allows hybrid heating, the commercial code also allows for hybrid water heating, so it makes sense for the council to have the commercial code allow hybrid space heating as well. This is a simple and effective code change that will help reduce costs for some multi-family dwellings in our state and make the code more equitable for rural regions that deal with colder winters than urban areas of our state.

Thank you for considering this rule proposal and we encourage you to vote in favor of adopting Option 2.

Patrick Hanks  
Policy & Research Manager