



STATE OF WASHINGTON  
**STATE BUILDING CODE COUNCIL**

Washington State Energy Code Development  
**Standard Energy Code Proposal Form**

Jan 2022

Log No. 24-RE-024 Vers. 2

Code being amended: ☐ Commercial Provisions ☒ Residential Provisions

Washington State Energy Code—Residential, WAC 51-11R

Code Section # R106

Brief Description:

Revision:

- No longer striking R106.3.
- Proposing to blend the IBC language with IRC language so the effect is similar to the IRC without additional requirements.
- Based on TAG preliminary feedback from the 5/30/25 meeting.

Proposed code change text: (Copy the existing text from the Integrated Draft, linked above, and then use underline for new text and ~~strikeout~~ for text to be deleted.)

**R106.3 Permit valuation.** The applicant for a permit shall provide an estimated value of the work for which the permit is being issued, such as electrical, gas, mechanical, plumbing equipment and other permanent systems, including materials and labor, at the time of application. ~~Such estimated valuations shall include the total value of the work, including materials and labor. Where, in the opinion of the code official, the valuation is underestimated, the permit shall be denied unless the applicant can show detailed estimates acceptable to the code official. The final valuation shall be approved by the code official.~~

**Commented [PH1]:** Language pulled directly from the 2024 IRC / 2021 WSRC.

**R106.4 Work commencing before permit issuance.** Any person who commences any work before obtaining the necessary permits shall be subject to an additional fee established by the *code official*, which shall be in addition to the required permit fees.

**R106.5 Related fees.** The payment of the fee for the construction, *alteration*, removal or demolition of work done in connection to or concurrently with the work or activity authorized by a permit shall not relieve the applicant or holder of the permit from the payment of other fees that are prescribed by law.

**R106.6 Refunds.** The *code official* is authorized to establish a refund policy.

Purpose of code change:

Revision:

Based on TAG preliminary feedback, offering a revised proposal that no longer strikes the permit valuation section and instead tries to match the IRC language.

The 2021 IECC and WSEC did not require permits to include work value estimates. While the 2021 International Residential Code and Washington State Residential Code requires permits to include a valuation, it does not state that if the building official believes the valuation is underestimated that they can deny the permit. This new language in the 2024 IECC is more like the requirements of the International Building Code.

June 26, 2025

BIAW members find this new requirement to be unnecessary, stricter than the IRC requirements, and may cause issues with obtaining permits in a timely manner if building officials disagree with estimates. The requirement in the WRC is sufficient.

Your amendment must meet one of the following criteria. Select at least one:

- |   |   |
|---|---|
| <input type="checkbox"/> Addresses a critical life/safety need.   | <input type="checkbox"/> Consistency with state or federal regulations. |
| <input checked="" type="checkbox"/> The amendment clarifies the intent or application of the code.                          | <input type="checkbox"/> Addresses a unique character of the state.     |
| <input type="checkbox"/> Addresses a specific state policy or statute.<br>(Note that energy conservation is a state policy) | <input type="checkbox"/> Corrects errors and omissions.                 |

Check the building types that would be impacted by your code change:

- |   |   |  |
|---|---|--|
| <input checked="" type="checkbox"/> Single family/duplex/townhome | <input type="checkbox"/> Multi-family 4 + stories | <input type="checkbox"/> Institutional |
| <input checked="" type="checkbox"/> Multi-family 1 – 3 stories    | <input type="checkbox"/> Commercial / Retail      | <input type="checkbox"/> Industrial    |

Your name Patrick Hanks

Other contact name [Click here to enter text.](#)

Your organization Building Industry Association of Washington

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## **Economic Impact Data Sheet**

**Is there an economic impact:** ☐ Yes ☒ No

Briefly summarize your proposal's primary economic impacts and benefits to building owners, tenants, and businesses. If you answered "No" above, explain your reasoning.

This change will not affect the construction of buildings, so it will not change energy use or construction cost.

Provide your best estimate of the **construction cost** (or cost savings) of your code change proposal? (See OFM Life Cycle Cost [Analysis tool](#) and [Instructions](#); use these [Inputs](#). **Webinars on the tool can be found [Here](#) and [Here](#)**)

\$[Click here to enter text.](#)/square foot (For residential projects, also provide \$[Click here to enter text.](#)/ dwelling unit)

Show calculations here, and list sources for costs/savings, or attach backup data pages

N/A.

Provide your best estimate of the **annual energy savings** (or additional energy use) for your code change proposal?

[Click here to enter text.](#)KWH/ square foot (or) [Click here to enter text.](#)KBTU/ square foot

(For residential projects, also provide [Click here to enter text.](#)KWH/KBTU / dwelling unit)

Show calculations here, and list sources for energy savings estimates, or attach backup data pages

N/A.

List any **code enforcement** time for additional plan review or inspections that your proposal will require, in hours per permit application:

No additional plan review or inspection time required.

**Small Business Impact.** Describe economic impacts to small businesses:

Small reduction in compliance costs because builders won't have to get permits rejected and reapply over disagreements about estimates with building officials.

**Housing Affordability.** Describe economic impacts on housing affordability:

May prevent unnecessary delays in permit approval.

**Other.** Describe other qualitative cost and benefits to owners, to occupants, to the public, to the environment, and to other stakeholders that have not yet been discussed:

**Instructions:** Send this form as an email attachment, along with any other documentation available, to: [sbcc@des.wa.gov](mailto:sbcc@des.wa.gov). For further information, call the State Building Code Council at 360-407-9255.

**All questions must be answered to be considered complete. Incomplete proposals will not be accepted.**