



March 10, 2022

Washington State Building Code Council
Andrew Klein, Council Chair
1500 Jefferson Ave. SE
PO Box 41449
Olympia, WA 98504-1449

RE: 2021 Washington State Commercial Energy Code

Dear Chair Klein and the Washington State Building Code Council:

As elected officials and government representatives representing more than 2.25 million Washington residents in King County and seven cities, we offer our support for the proposed 2021 Washington State Commercial Energy Code. We support these code changes as they provide energy savings through reasonable and practical measures, support the growth of family wage careers in the clean energy economy, and make progress toward local and state climate goals. Each step forward in efficiency is important to achieving the statewide goal of net zero ready buildings by 2031.

Confronting climate change and accelerating the transition to a clean energy economy are top priorities for the King County-Cities Climate Collaboration (K4C), a coalition of local governments – King County, 18 cities and the Port of Seattle – working to advance a shared goal of reducing carbon emissions 50 percent by 2030. The jurisdictions in the K4C represent 80 percent of King County's 2.25 million residents, which is nearly 25 percent of the state's population.

The built environment is one of the largest sources of carbon emissions in King County. In a 2017 inventory, emissions from the commercial built environment were 22 percent of all emissions. Strong energy codes are essential to reaching the K4C's carbon emission reduction target and continue us forward on the statewide goal to reduce energy use in the built environment 70 percent from 2006 levels by 2031.

Passage of strong codes at the state level will accelerate the decarbonization of the built environment, a key component to reach our climate goals. Several partners in the K4C have already taken action to develop strong codes in their jurisdictions. The cities of Seattle and Shoreline have passed commercial code ordinances that reflect a commitment to the K4C and state climate goals by requiring highly efficient building design, which reduces resource use and thus operating costs for owners or tenants and incenting the use of electric systems for space and water heating. King County has proposed similar code to be contemplated by the King County Council in early 2022.

We would like to emphasize our support for these proposed elements that advance K4C goals to reduce emissions in the commercial and multi-family built environment:

- 21-GP1-103: Reduces emissions by requiring heat pump space heating in lieu of fossil fuel or space heating, with exceptions allowed.
- 21-GP1-136: Reduces emissions by requiring heat pump water heating in lieu of fossil fuel or electric resistance water heating.
- 21-GP1-146: Promotes higher performance buildings by increasing the number of efficiency credits required.
- 21-GP1-179: Requires an electrical outlet at gas equipment installations in multifamily units, making the switch to electric appliances easier.
- 21-GP1-178: Saves energy by installing advanced lighting controls for open offices greater than 5,000 square feet.
- 21-GP1-115: Requires multi-family buildings to build “solar ready,” reducing costs associated with future solar installations.
- 21-GP1-78: Increases zero-carbon energy generation by requiring on-site renewable energy systems for commercial buildings over 10,000 square feet.
- 21-GP1-208: Modernize Washington State’s code to allow concrete masonry unit walls to qualify for insulation requirements.
- WAC 51-50-4700, Appendix P: Reduce lifecycle and embodied emissions of buildings through increased reuse and recycling of materials.

In addition, we provide a suggestion for the following provision that addresses emissions in transportation sector:

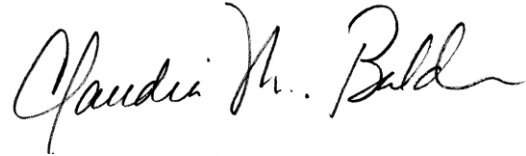
- WAC 51-50-0429, Section 429: We do not support the proposal as currently written, as more stakeholder participation is needed in the development of EV charging requirements. We support the formation of a special EV Charging Infrastructure Technical Advisory Group by the SBCC to develop 2021 IBC requirements around equitable transportation electrification by requiring a certain amount of installed EV chargers, EV-ready, and EV-capable parking spaces in commercial and multi-family buildings.

Thank you for the opportunity to provide comment. We support the proposed revisions to the Commercial Energy Code, and we urge the Council to approve this code.

Sincerely,



Dow Constantine
King County Executive



Claudia Balducci
Chair, King County Council



Sofia Aragon
Mayor, City of Burien



Mary Lou Pauly
Mayor, City of Issaquah



Penny Sweet
Mayor, City of Kirkland



Salim Nice
Mayor, City of Mercer Island



Angela Birney
Mayor, City of Redmond



Jessyn Farrell
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Nathan Torgelson
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Keith Scully
Mayor, City of Shoreline