Washington State Building Code Council

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Washington State Building Code Council 1500 Jefferson Avenue SE Post Office Box 41449 Olympia, Washington 98504-1449

September 20, 2012

Dear Members of the Washington State Building Code Council,

On behalf of the American Institute of Architects Seattle (AIA Seattle) that represents over 1,700 professional members, we support adoption of the proposed 2012 International Energy Efficiency Code (IECC) and selected amendments which advance energy efficiency above current standards.

AIA Seattle is a professional organization of architects and allied professionals in six counties from Clallam to King County. We believe that incremental energy code efficiency improvements are vitally important to mitigate climate change and meet the Architecture 2030 Challenge. For Washington to remain on track to meet its legal requirement for carbon neutral new construction by 2031, we must continue with substantive advancements in the energy code to ensure greater building efficiency.

With one of the nation's most progressive codes, Washington has a long history of energy efficiency leadership. In past code advancements, Architects, Engineers and the Construction Industry have successfully met the challenge, gaining expertise in energy efficient sustainable building and raising the bar resulting in some of the most well-designed, and constructed buildings in Washington. Instead of limiting business opportunities, often more stringent codes stimulate increased expertise in energy efficient design, which has enabled many AIA members to expand their businesses and operations, improving the State's economy.

In an era of shrinking funding for public buildings, our members are currently designing high performing buildings that far exceed the proposed 2012 Energy Code requirements within tight budgets and aggressive schedules. For example, the new headquarters for the United States Army Corps of Engineers at Federal Center South in Seattle is designed to perform at an EUI of 20.3 kBtu/sf/year. To set the performance of Federal Center South into context, its expected efficiency exceeds the office building performance 99% of the office buildings nationally and is far beyond the level proposed in the 2012 energy code. If this exemplary performance is possible on public projects with a limited funding and a tight schedule, the comparatively modest energy efficiency improvement proposed for 2012 should be feasible for other publically-funded projects.

The AIA Seattle feels the proposed level of energy efficiency is technically feasible at all scales, from large commercial projects with complex technology, to single family residential projects



with well-crafted details and straight-forward systems. AIA Seattle firms are currently exceeding these requirements with projects designed to the stringent Passive House standards. These residential projects are currently achieving exceptionally low levels of energy usage to meet the Passive House standards (i.e., 38.1 kBtu/sf/yr) – again, far beyond the proposed incremental energy efficiency increased in the 2012 code.

While each cycle of code revisions often triggers a learning curve for the design and building industries, we believe that many of our members are already designing and realizing buildings that are beyond many of the proposed 2012 Energy Code requirements. We believe strongly that we cannot retreat from our path of mitigating the climate change through a substantive reduction of building energy use and associated emissions. We urge the Washington State Code Council to adopt the 2012 International Energy Efficiency Code and selected amendments that advance required energy efficiency levels beyond the current code.

With Best Regards,

Rico Quirindongo, AIA

President

AIA Seattle

David Walsh, AIA Chair, Public Policy Board

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