March 5, 2013

Mr. Ray Allshouse, Chair Washington State Building Code Council P.O. Box 41014 Olympia, WA 98504-1014

Dear Chairman Allshouse and State Building Code Council Members:

As a developer in the Seattle/Bellevue area, Wasatch urges the SBCC to consider an expedited rule to allow a more viable prescriptive path for achieving a 40% WWR in buildings without the use of the Total Building Performance energy modeling path.

The recently adopted 2012 WSEC includes an IECC provision that reduces the maximum vertical wall glazing percentage to 30% for Commercial Buildings. This results in a 25% reduction in the maximum vertical wall glazing over the 2009 WSEC. A 25% reduction in the allowable maximum vertical glazing percentage in one code cycle is too big of a step. Under the current 2009 WSEC, architects for commercial office buildings achieve on average a 42% glazing percentage. This percentage is considered the minimum acceptable to the tenants occupying these buildings. We are hereby supporting what we believe to be a reasonable path to achieving 40% WWR that will also enable the SBCC to achieve its energy saving goals

Based on a recent study of typical building floor plates most buildings would not be able to achieve the requirement for 50% of the gross conditioned floor area in the daylight zone. This is largely due to the fact that a portion of the gross conditioned floor space is back of house support areas, below grade areas, and other core areas (such as stairwells, toilet rooms, elevator lobbies, electrical rooms, mechanical rooms, elevator machine rooms, etc.) that cannot and need not be cost effectively day lit.

Without adjustment of the gross conditioned floor area calculation for the day lighting this will force commercial building developers to install triple pane glazing or the best possible double pane glazing to achieve a standard commercial building glazing percentage. If the 2012 WSEC is not amended this could stall many projects that cannot afford the additional cost of dramatically improved glazing systems to achieve a reasonable vertical wall glazing percentage.

Adequately glazed buildings are critical for providing productive work or home environments for building occupants. It is important to have prescriptive code paths available and not force all projects toward the Total Building Performance energy modeling compliance path.

Wasatch supports the code proposal developed by Rushing Company and Vulcan, Inc., that provides clarification of the 2012 WSEC Section C402.3.1. This achieves the intent of the 2012 IECC, provides a viable prescriptive path to 40% vertical wall glazing, and improves the enforceability of the code.

Sincerely,

Michael Nielson

Chief Investment Officer