



June 17, 2013

Ray Allshouse, Chair  
State Building Code Council  
1500 Jefferson Avenue SE  
Olympia, WA 98504

RE: Energy Code Climate Zones

Chair Allshouse:

Thank you and the Council for your willingness to address this important issue through the Emergency Rulemaking process. This letter provides additional support for BIAW's testimony at the June 14, 2013 State Building Code Council meeting regarding the proposal to include Okanogan, Ferry, Pend Oreille and Stevens Counties in Climate Zone 5B, joining all remaining counties in Eastern Washington, as follows:

- Excluding these four counties from Climate Zone 5B not only adds to the cost of construction for the additional product(s) for compliance but could also create a lack of product availability in the Spokane area, since it would not be required elsewhere in Washington. Additional costs of special order and direct transport/shipping for products needed only in these four counties.
- Of major concern will be the potential for lack of technical support for both builders and code officials in the four counties in question which typically comes from the Spokane area. This support would be limited or possibly unavailable with Spokane in a different Climate Zone with different code compliance.
- In many Washington counties application of the 2009 Energy Code has been virtually non-existent because of the economic downturn and lack of new construction. In today's market, the construction industry is still extremely fragile and any obstacle (such as the one created by a different and more restrictive Climate Zone) could create an added barrier to recovery.

Best Regards.

A handwritten signature in black ink that reads 'Jan Rohila'.

Jan Rohila, BIAW  
Administrative Services Director

cc: Tim Nogler, Council Managing Director