

3TIER Environmental Forecast Group
 Advocates for the West
 AirWorks, Inc.
 Alaska Housing Finance Corporation
 Alliance to Save Energy
 Alternative Energy Resources Organization
 American Rivers
 A World Institute for a Sustainable Humanity
 BlueGreen Alliance
 Bonneville Environmental Foundation
 Centerstone
 Citizens' Utility Board of Oregon
 City of Ashland
 City of Seattle Office of Sustainability & Environment
 Clackamas County Weatherization
 Climate Solutions
 Community Action Partnership Assoc. of Idaho
 Community Action Partnership of Oregon
 Conservation Services Group
 David Suzuki Foundation
 Earth and Spirit Council
 Earth Ministry
 Ecova
 eFormative Options
 Emerald People's Utility District
 Energy Trust of Oregon
 Environment Oregon
 Environment Washington
 Friends of the Earth
 Grasslands Renewable Energy
 Home Performance Guild of Oregon
 Home Performance Washington
 Housing and Comm. Services Agency of Lane Co.
 Human Resources Council, District XI
 Iberdrola Renewables
 Idaho Clean Energy Association
 Idaho Conservation League
 Idaho Rivers United
 Idaho Rural Council
 Interfaith Network for Earth Concerns
 Laborers International Union of North America, NW Region
 League of Women Voters – ID, OR & WA
 Metrocenter YMCA
 Montana Audubon
 Montana Environmental Information Center
 Montana Renewable Energy Association
 Montana River Action
 Montana Trout Unlimited
 National Center for Appropriate Technology
 Natural Resources Defense Council
 New Buildings Institute
 Northern Plains Resource Council
 Northwest Energy Efficiency Council
 Northwest Renewable Energy Institute
 Northwest Solar Center
 NW Natural
 NW SEED
 Olympic Community Action Programs
 One PacificCoast Bank
 Opower
 Opportunities Industrialization Center of WA
 Opportunity Council
 Oregon Energy Coordinators Association
 Oregon Environmental Council
 Oregon HEAT
 Oregonians for Renewable Energy Policy
 Pacific Energy Innovation Association
 Pacific NW Regional Council of Carpenters
 Pacific Rivers Council
 Portland Energy Conservation Inc.
 Portland General Electric
 Puget Sound Advocates for Retired Action
 Puget Sound Cooperative Credit Union
 Puget Sound Energy
 Renewable Northwest Project
 River Network
 Salmon for All
 Save Our wild Salmon
 Sea Breeze Power Corp.
 Seattle Audubon Society
 Seattle City Light
 Sierra Club
 Sierra Club, Idaho Chapter
 Sierra Club, Montana Chapter
 Sierra Club, Washington Chapter
 Silicon Energy
 Smart Grid Oregon
 Snake River Alliance
 Solar Oregon
 Solar Washington
 South Central Community Action Partnership
 Southeast Idaho Community Action Partners
 Southern Alliance for Clean Energy
 Spokane Neighborhood Action Partners
 Student Advocates for Valuing the Environment
 Sunergy Systems
 Sustainable Bainbridge
 Sustainable Connections
 SustainableWorks
 The Climate Trust
 The Energy Project
 The Mountaineers
 The Policy Institute
 Trout Unlimited
 US Green Building Council, Idaho Chapter
 Union Of Concerned Scientists
 United Steelworkers of America, District 12
 Washington Environmental Council
 Washington Local Energy Alliance
 Washington State Department of Commerce
 Washington State University Energy Program
 World Steward



June 24, 2013

Washington State Building Code Council
 1500 Jefferson Street
 Olympia, WA 98504-1449

RE: Special June 28 SBCC Meeting

Dear Councilmembers:

Please accept the following comments for the public record.

- Agenda Item 3, Energy Code, modifying the climate zone tables. We support this change to include Ferry, Okanogan, Pend Oreille and Stevens counties in Climate Zone 5B. This change, which reflects current practice, will make compliance easier and therefore more effective for builders and code officials.
- Agenda Item 4, Energy Code, increasing the glazing allowance in commercial buildings. We support the proposed emergency rulemaking to slightly relax the limit on glazing given that:
 - the City of Seattle has adopted a similar alternative compliance path;
 - options for daylighting offsets are limited in dense, urban high rise buildings; and,
 - the proposed alternative requires more efficient windows (lower U-values) to help make up the lost energy savings.

It is important to note that although this change appears to result in a relatively small loss of energy savings, added together with the earlier rollbacks this cycle (e.g., exempting masonry walls) the 2015 cycle will require more substantive changes to keep pace with the 2030 energy savings code target. We strongly encourage the Council to undertake further technical analysis of the 2012 commercial code. Such an analysis will provide the Council and stakeholders a stronger understanding of the 2012 code savings, and provide a better basis by which to set a savings goal for the 2015 cycle.

Thank you for considering our views.

Sincerely,

Kim Drury
 Senior Policy Associate