

June 16, 2022

Chair Tony Doan
Washington State Building Code Council
1500 Jefferson St SE
Olympia, WA 98501

Chair Doan and Members of the State Building Code Council:

We, the undersigned environment and climate organizations, write to strongly urge the State Building Code Council (SBCC) to **move the full package of residential energy code proposals out to public comment**. Fairness and transparency in the public process requires that the full list of proposals, vetted by the Technical Advisory Group, be daylighted so that the SBCC will have the benefit of a robust public debate.

As the climate crisis progresses, its impacts are increasingly felt here in Washington. In the past year alone, we have seen the direct impacts of climate change in the shape of unprecedented wildfires, droughts, and heat waves which have cost hundreds of lives and have had untold economic impacts across the state. In the face of the climate emergency, it is critical that officials at all levels of government pass the policies needed to reduce emissions, protect our communities from further harm, and foster resilience. **This package of proposals takes steps to address both the efficiency and the use of fossil fuels in our newest homes, which, once built, will be around for decades.**

Buildings are the fastest growing source of carbon emissions in Washington State¹, with this increase largely attributable to the use of fossil gas in homes and buildings. In 2018, burning fossil fuels in the buildings sector in Washington produced 18 million metric tons (MMT) of carbon dioxide equivalent (CO₂e), the equivalent to the annual emissions from 3,957,182 cars or 5 coal plants². As such, Washington's 2021 State Energy Strategy found that electrifying buildings will be the lowest-cost pathway to meeting the state's climate goals of reducing emissions 95% from 1990 levels by 2050³. By statute, Washington's energy code is required to become increasingly more efficient every revision cycle so that new buildings in 2031 are 70% more efficient than those built in 2006⁴. **Because there are only four code cycles between now and the 2031 code, it is essential that each revision maximizes what can be done to make buildings more efficient and transition away from fossil fuels.**

The heat pump proposals on the table help get us there; **most significantly, electric heat pumps and induction cooking appliances are both more efficient than fossil fuel options and eliminate on-site fossil fuel combustion**. Moving to highly-efficient heat pump technology can reduce energy use for heating and cooling homes, especially in comparison to outdated window air conditioning units. And as we continue to see peak temperatures rise in the northwest, more and more people will need air conditioning – which heat pumps provide alongside heating - to cope with heat-related health impacts, or to adequately cool their homes while they are shut inside due to wildfire smoke.

¹ <https://fortress.wa.gov/ecy/publications/documents/1802043.pdf>

² <https://www.eia.gov/environment/emissions/state/>

³ <https://www.commerce.wa.gov/growing-the-economy/energy/2021-state-energy-strategy/>

⁴ <https://app.leg.wa.gov/RCW/default.aspx?cite=19.27A.160>

We urge the SBCC to present the full package of proposed residential code amendments, including the heat pump proposals, for a fully deliberative public comment process.

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