

Jenifer, I respectfully submit the suggestions **in green below** to the Construction Code Advisory Board (CCAB) for consideration. I also request these be included on the “Public Comment” blog on the SDCI website.

My suggestions below will more equitably burden mid-rise commercial multi-family (4 stories and greater) apartment projects and thus renters with energy efficiency construction measures and associated costs. This will slow/ease the escalation of rents in Seattle by keeping the costs of construction as low as possible in this market (also supporting non-profit housing builders such as LIHI, Compass Housing, Bellwether, Plymouth, DESC, Mercy Housing, and more) and begin to focus political and legislation attention on single family homes (and cars). Please refer to the attached “energy slide” referencing the calculated differences between the impacts of 2015 SEC vs. impacts of single family homes and cars over the next 5 years with no legislative action.

See highlighted language in green below.

- C406 – Only (6) credits required like 2018 WSEC
- C407 – Same % as 2018 WSEC for BFP
- C412 – Renewable – smaller PV array required but still larger 2015 SEC (0.07 w/sf) and 2018 WSEC optional Appendix

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C406.1 Additional energy efficiency credit requirements. New buildings and changes in space conditioning, *change of occupancy* and building *additions* in accordance with Chapter 5 shall comply with sufficient packages from Table C406.1 so as to achieve a minimum number of ~~((six))~~ **8 credits**. Each area shall be permitted to apply for different packages provided all areas in the building comply with the requirement for ~~((six))~~ **8 credits**. Areas included in the same permit within mixed use buildings shall be permitted to demonstrate compliance by an area weighted average number of credits by building occupancy achieving a minimum number of ~~((six))~~ **8 credits**.

Exceptions:

1. Low energy spaces in accordance with Section C402.1.1.1 and equipment buildings in accordance with Section C402.1.2 shall comply with sufficient packages from Table C406.1 to achieve a minimum number of ~~((three))~~ **4 credits**.

2. Building additions that have less than 1,000 square feet of *conditioned floor area* shall comply with sufficient packages from Table C406.1 to achieve a minimum number of ~~((three))~~ 4 credits.

3. Other than high-rise Group R-2 multi-family residential buildings shall comply with sufficient packages from Table C406.1 so as to achieve a minimum number of 6 credits. Each area shall be permitted to apply for different packages provided all areas in the building comply with the requirement for 6 credits. Areas included in the same permit within mixed use buildings shall be permitted to demonstrate compliance by an area weighted average number of credits by building occupancy achieving a minimum number of 6 credits

C407 – Same efficiency BPF as Washington State:

TABLE C407.3(2)
BUILDING PERFORMANCE FACTORS (BPF) TO
BE USED FOR COMPLIANCE WITH SECTION
C407.3

Building Area Type	Building Performance Factor
Multifamily, high-rise	((0.58)) 0.52
Multifamily, other than high-rise	0.58
Healthcare/hospital	((0.54)) 0.49
Hotel/motel	((0.64)) 0.58
Office	((0.56)) 0.51
Restaurant	((0.70)) 0.63
Retail	((0.47)) 0.43

School	((0.36)) 0.32
Warehouse	((0.48)) 0.43
All Others	((0.54)) 0.49

C412 Renewable

C412.1 On-site renewable energy systems. Each new building or *addition* larger than 5,000 square feet of gross conditioned floor area shall include a renewable energy generation system consisting of not less than 0.25 watts rated peak photovoltaic energy production per square foot of *conditioned space*.

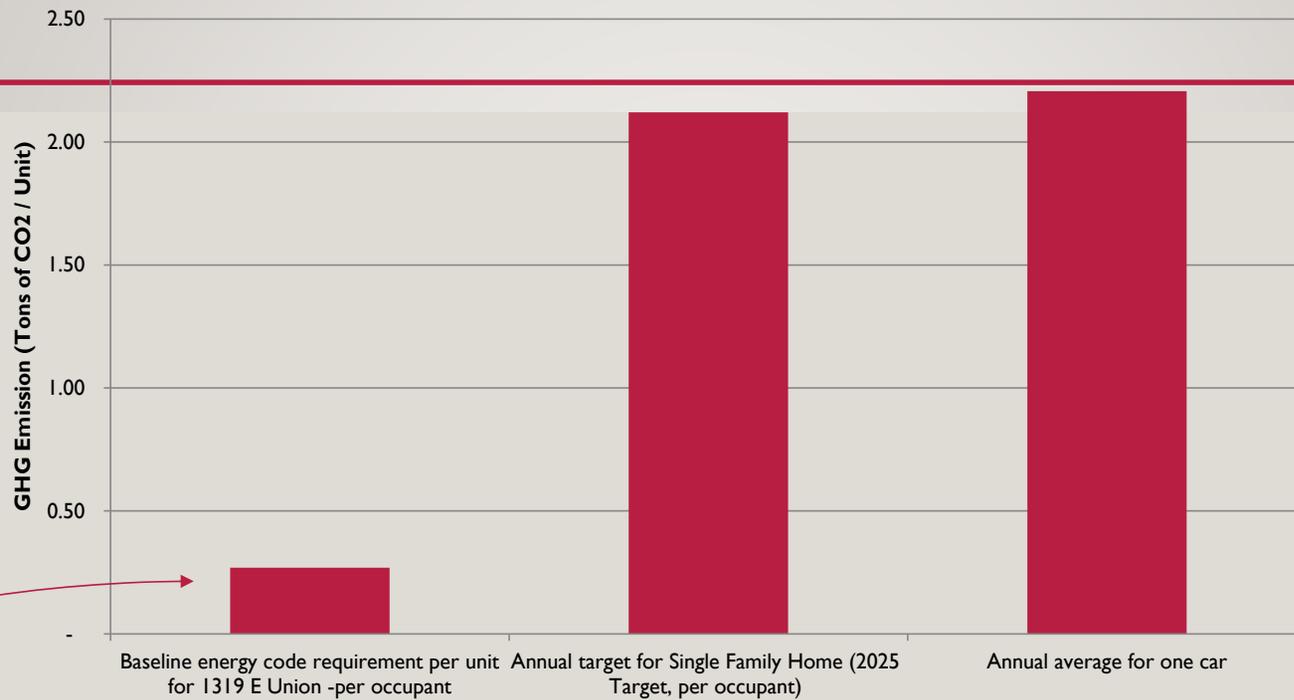
Exceptions:

5. Affordable housing. The on-site renewable energy generation system is not required for *affordable housing* projects.
6. Other than High-rise Group R-2 Multi-Family. Each new Group R-2 Multi-family building or *addition* larger than 5,000 square feet of gross conditioned floor area shall include a renewable energy generation system consisting of not less than 0.10 watts rated peak photovoltaic energy production per square foot of *conditioned space*.

Rae Anne Rushing, PE, LEED®AP BD+C- CEO/Co-Founder
RUSHING | D 206-285-7112 | C 206-419-4464
www.rushingco.com

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