



Chair Diane Glenn
Washington State Building Code Council
1500 Jefferson Avenue SE
Post Office Box 41449
Olympia, Washington 98504-1449
(VIA EMAIL TO: diane.glenn@des.wa.gov, sbcc@des.wa.gov)

RE: Support delay of adopted 2018 Building Codes effective date

January 5, 2021

Dear Chair Glenn and Council Members:

I am writing you on behalf of the Building Industry Association of Clark County (BIA) to request that you delay the implementation of the adopted 2018 Building Codes. BIA is the region's leading home building industry advocate and represents over 700 companies with more than 12,000 employees.

Our companies strive to obey all international, state and local building codes, but to do that they must understand those codes and how they will be implemented.

In a recent meeting between our builders and local building officials, a member asked for the "prescriptive energy code worksheet" the county will be using for permits post February 1. We were informed that the worksheet was not completed and that it was based on a worksheet provided by the Washington State Energy Program worksheet, a secondary resource that builders also use. Unfortunately, that document is still in draft form, and the code compliance calculator is not yet available.

It begs the question, if the regulators don't have the information to provide builders with the worksheet outlining how they will be appraising compliance, how are builders able to comply?

Permitting and enforcement differs by jurisdiction, and although they are based on the same underlying statutes and regulations, the worksheets and checklists are essential for builders to know exactly what form the information needs to be presented in and informs their decision on a path of compliance. For example, one local jurisdiction requires a "key or guide" on the erosion control plan, which will be rejected without it, while it is not expected, or even discouraged, in other jurisdictions. When making decisions that can add thousands or tens of thousands of dollars to a home, it is imperative that builders understand what is expected for compliance and for plans submittals that can be costly to update based on changing documentation requirements.

The city of Seattle has already extended the implementation of their city building codes to March 15, 2021 and we strongly encourage the state of Washington to do the same.

We ask that you recognize the difficult situation our members are operating in, due to the lack of guidance and paperwork from the bodies responsible for educating the construction industry and enforcing the code. Please postpone the implementation of the 2018 Building Code and work to ensure that all necessary materials are available to builders at least a month prior to implementation.

Thank you for your time and consideration of this request.

A handwritten signature in blue ink, appearing to read "C. Ryan Makinster", with a long horizontal flourish extending to the right.

Ryan Makinster
Government Affairs Director

CC: Representative Mike Chapman
Representative Larry Hoff
Representative Joe Nguyen
Senator Lynda Wilson
Al French
Andrew Klein
Doug Orth
Leanne Guier
Micah Chappell
Phillip Lemley
Robert Graper
Todd Beyreuther