

Curb, Dustin (DES)

From: Bumbalov, Stoyan (DES)
Sent: Thursday, November 3, 2022 1:45 PM
To: Curb, Dustin (DES)
Subject: FW: URGENT Re: concerns with WSEC-R testimony documentation
Attachments: Public Comment Analysis 11.3.2022.pdf

From: Rachel Koller, Shift Zero <kollerwork@gmail.com>
Sent: Thursday, November 3, 2022 12:37 PM
To: Braaksma, Krista (DES) <krista.braaksma@des.wa.gov>; Bumbalov, Stoyan (DES) <stoyan.bumbalov@des.wa.gov>
Subject: URGENT Re: concerns with WSEC-R testimony documentation

External Email

Krista and Stoyan,

It came to our attention today that **BIAW shared the attached letter grossly misrepresenting the number of comments in support of the energy code proposals**. Please help address this with an accurate summary in advance of the council meeting tomorrow.

We shared our concerns on Oct 14 about the written comment log and how it did not reflect the numbers accurately. Thank you for making [updates](#) earlier this week to reflect petition numbers in the submissions, but if this has not been highlighted to the council then they are not aware of the true volume of supporting testimonies.

Please let me know as soon as possible how SBCC members will be provided with clear and accurate information on the testimony received.

Thank you,
Rachel Koller

On Thu, Oct 27, 2022 at 9:46 AM Rachel Koller, Shift Zero <kollerwork@gmail.com> wrote:

Hi Krista,

I wanted to check in on the questions below, and ask if this can be addressed prior to the next council meeting on November 4. Thank you for considering.

Best,
Rachel

On Fri, Oct 21, 2022 at 12:04 PM Rachel Koller, Shift Zero <kollerwork@gmail.com> wrote:

Hello Krista,

A huge thank you for processing all of the public comments for the residential energy code updates. With respect to community input, we want to stress the fact that thousands of people from WA weighed in with support of the energy code updates – they were not each individually noted on the [written testimony log](#) but were batched when they were submitted to respect staff administration time. **We want to ensure that the diversity of constituencies and**

geographies in support of the code updates are shown for the record, and we appreciate your consideration.

For example, this [public comment submission from Climate Solutions](#) is a letter signed by 555 Washington residents, including their names and addresses, in support of the proposals. However it is listed as a single line in the log, without noting it represents hundreds of voices.

In contrast, in the [meeting attachments for today's council meeting](#) there are 2 links for "form letters" which are duplicative:

- [2021 Group II Form Letters Received - Agenda Item 5](#)
- [Form Letters Testimony Summaries Agenda Item 5](#)

These links each contain the same set of submissions from groups opposing the code updates, and make it appear as if there are twice as many forms as there actually are. In addition, the links include a tally of numbers of commenters, however there are no individual names listed. **How are SBCC members to verify the authenticity of these submissions? Finally, why are only opposition group letters included in that log, when there were a number of form letters and sign-on letters in support of the proposals, which were not separated.**

Below is a summary of our tracking of the supportive testimony and written comments. Please let me know how we can help clarify for council members and the public the breadth and depth of comments accurately. We understand how time intensive this process is and greatly appreciate all of your efforts! Thank you for your consideration.

Best,

Rachel Koller

Summary of Supportive Testimony for WSEC-R

*In all we tracked **over 70 groups and 4600 individuals** submitting supportive written comment for the residential code updates, highlighting the heat pump requirements and stricter gas stove ventilation.*

*In addition, **107 people provided oral testimony in support** of these proposals at the Yakima and Olympia public hearings. 44 people spoke in opposition, for a 2.4/1 ratio in favor.*

39 cities and counties registered support, including [Whatcom County](#), [Spokane](#), [King County](#), [Vancouver](#), and [Seattle](#).

Written Comment Highlights:

- Nearly 70 local elected officials from all parts of our state ([local elected letter](#))
- 18 building industry businesses and organizations, and 17 building industry individuals ([building industry letter](#))
- 7 affordable housing organizations ([affordable housing letter](#))
- 16 environmental and racial justice organizations ([EJ letter](#))
- Over 80 health professionals and the Washington State Medical Association ([health professionals letter](#))
- Over 120 faith leaders ([faith letter](#))
- 8 members of America is All In ([America is All In letter](#))

4,650 comments from the below organizations and the above constituency letters: (If you would like, our team can provide the exact numbers per organization that were submitted to the SBCC by Oct 14 that culminated in the 4,650 number.)

- 350 Seattle
- 46th District Dems
- Alliance for Community Engagement
- Climate Solutions
- Earth Ministry

- *Earthjustice*
- *Environment WA*
- *League of Women Voters*
- *NRDC*
- *RE Sources*
- *Sierra Club*
- *The Lands Council*
- *Thurston Climate Action Team*
- *WA Environmental Council*
- *WA Physicians for Social Responsibility*
- *WashPIRG*

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