## **Comments on the 2024 IECC Appeals**

2/5/2014

The purpose of Building Codes is to protect the Health and Safety of the residents. It is not to impose government "desires" on residents – this is done through laws passed by Congress or State or Local Legislatures.

There is now a Housing Crisis in the US. Housing costs are extremely high – both rentals and owned. Many families cannot find adequate housing, and home ownership is too expensive for many families.

Many proposed requirements in the 2024 IECC will <u>unnecessarily increase the cost</u> of new home construction and renovations of existing homes. Some renovations require them to "be brought up to current code" which increases the cost beyond their budget. This results in people not upgrading their homes and continuing to live with older, less energy efficient construction. Overly demanding requirements will <u>prevent</u> energy savings, rather than promote them.

The IECC economics analysis is based on a 30-year payback. However he typical U.S. homeowner spends 12.3 years in their home. People won't upgrade their home when they don't plan to live there for 30 years. This policy is counter-productive.

I support all the Appeals to the 2024 IECC. The appeals from manufacturer and utilities are based on real-world experience, which many of the authors of the proposed code changes do not have.

In addition, I support the two Appeals submitted by ICC Region VI.

Thank You,

James Guinan, PE