



8/12/20

Members of the 2019 Group B Appeals Board, Mr. Wheeler, and Mr. Sims,

The City of Seattle participated in the 2021 IECC voting process including some new voting representatives from the Office of Sustainability and Environment voting for the first time this year. We were recently made aware that certain challenges to proposals and voting processes have surfaced as appeals and we are writing today to encourage you to uphold the outcomes of this voting process.

We would like to address three main areas of appeals:

- 1) **The attempt to overturn the online vote:** Our voting representatives followed the rules laid out by the ICC in the voting process, and some of Seattle's votes may have overturned some proposals that were disapproved at the committee level and at the hearings in Las Vegas. We took into consideration the opinion of the committee, the written proposals and public comments, and the video testimony, and believed that for the City of Seattle, the proposal met our needs. Our needs may be different than those represented by the committee or the members in Las Vegas; our votes represent the desire to move proposals that help to meet the needs of our community while addressing Seattle's energy and climate goals.
- 2) **The attempts to remove electrification measures from the code:** We disagree with these actions and believe that building owners should have fewer barriers to electrify end uses. Seattle is unique in that our electricity is carbon neutral, with more than 90% of generation coming from clean hydro and wind. For this reason, electrification readiness is critical to meeting our energy conservation and climate goals. It is less costly to reduce electrification barriers up front in new construction rather than for building owners to pay for costly electrical infrastructure later.
- 3) **The attacks on our credentials to be voters:** Our city staff put significant effort into following the ICC guidelines to become members, register governmental voting representatives, engage in understanding the proposals, and vote using the cdpAccess tool. Given limited budgets for travel to participate in multiple iterations of the code development process, the open voting period was an excellent opportunity for our staff to be engaged in this process. We believe it is of great benefit to have a larger percentage of eligible voting members participate in the code development process. City voting staff followed the rules to become members and are informed and knowledgeable on a variety of topics including code development, energy and climate policy, code and policy enforcement, architecture and building science. It is presumptive to attack the knowledge and intent of our voting staff in a process that supposedly welcomes diversity in areas of expertise.

Thank you for the opportunity to address these recent appeals and we encourage you to uphold the voting results that were an outcome of the actions taken by our informed and knowledgeable staff.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jessica Finn Coven".

Jessica Finn Coven
Director, Office of Sustainability and Environment

A handwritten signature in blue ink, appearing to read "Nathan Torgelson".

Nathan Torgelson
Director, Department of Construction & Inspections