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Sent: Thursday, January 7, 2021 10:28 AM

To: Member Input <memberinput@iccsafe.org>

Subject: Written comments regarding proposed 2024 code cycle

Good day, I'm an energy code plan reviewer for the District of Columbia. Since 2014 I've had the pleasure of being able to assist designers and clients with how to ensure energy code compliance and improve their living experience through proper implantation of these requirements. Having been an HVAC installer, working on commercial and residential structures throughout the DMV and owning an ESCO for over 30 years. I do believe in this area I have knowledge that should be considered for this new code cycle.

At this time, it appears the technology and methods are way ahead of the industries ability to either design, review or enforce even the old code cycle requirements. And now here comes new code requirements. Had I not had practical knowledge gained by field work with all trades involved with building construction I would not be able to serve my clients or the District of Columbia in any meaningful manner. What I'm saying is, the level of knowledge and expertise required to review current plans for not only code requirements but also practical means of construction and enforcement, is getting to the point where reviewers require a degree (which I have, Electrical Engineer) to process the amount of information required to render a product that gives them a sense of satisfaction and does just due, to the clients they serve and the agencies they work for.

Also, consider the cost to homeowners and designers who rely on us code officials to ensure their work is safe and code compliant. Its past the point where homeowners are being over charged by designers who don't know the code or lack the incentive (money), but pass the additional cost of hiring a so called expert to the homeowner only to find they still have repeated review cycles to get their projects approved and who suffers, the homeowner. Designers should have basic building science knowledge as part of their curriculum for certification. And if they do have it now they need refresher courses as we do to maintain that proficiency.

I'm an engineer, and believe me, it takes some time to understand all the intricacies of the code and then apply them evenly to a wide range of plan sets. Some of these plans bear no resemblance to a set of instructions needed to construct a building much less display code compliant information. I'm afraid we are moving ahead in some areas - say technology and methods but are leaving behind the people factor. People are required to construct buildings, at this time, people are required to make an assessment as to the quality of plans and compliance with the code and people are required to inspect and enforce the code.

But the rush to approve plans and keep management pleased is causing a lot of reviewers to pass projects that if given the time would otherwise not be approved. Not all Agencies heads understand what it takes to review for energy code compliance nor do they provide the staffing or allow adequate time for training for us to keep up with this ever changing field.

As a possible solution to this dilemma I recommend states and or localities establishing an energy / green team concept which provides all parties involved the opportunity collaborate more efficiently on these matters. Agencies responsible for code compliance should be structured in a way that provides the maximum possible opportunities for staffing and resources to ensure compliance is met during the review process and at the enforcement level with reviewers, inspectors, analyst and managers staffed

appropriately. Here in the District it started out that way but years of changes at the top level have rendered us siloed and incapable of providing the services we were hired to do.

It is my sincere hope that across the board emphasis is placed on the development of not only technology and methods but people too!

Regards,

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