

Dear President Wheeler and ICC Board of Directors:

Thank you for accepting public comments. I would like to express my concern regarding the proposed development framework for the IECC and Chapter 11 of the IRC and encourage you to reject it. Over multiple code development cycles, I have participated in the current process in many ways: submitting proposals, testifying, serving as a code committee member, and having the privilege of voting on this national model policy. No doubt, I believe there is room for improvement in this process. The number of code changes proposed each cycle and the hours of associated testimony is exhausting, and the volume of special interests' lobbying of the voting membership is concerning. I often comment that these groups need to learn to "read the room," recognizing that an additional 45 minutes of testimony will convince neither their opponents nor the voters.

Still, however lengthy, expensive, and political this process can be, I always take comfort that the check on this enormous national policy responsibility will be the voting membership: the boots on the ground administering this policy when it comes to our jurisdiction. As a member of my state's Building Code Council, we depend on this national vetting process. Not only is input from international industry experts valued, but especially that of our fellow governmental voting members. For good or ill, North Carolina takes the I-Codes as our starting point, keeps good changes, and adds amendments that historically have worked for our state. In contrast, we do not customize ASHRAE 90.1, RESNET 301, etc., standards because we see them as internally-integrated and, frankly, the cost of participation is high for governmental employees in the development process. What are we to do with a closed IECC standard as an adopting jurisdiction?

ICC has been the organization for governmental officials, facilitating member participation, education, and implementation of the code. Without question, voting members should understand the votes they cast. My interpretation of the proposed framework allows current members at most $\frac{1}{3}$ of the vote, with not less than $\frac{2}{3}$ allocated to other interests. Jurisdiction's voting members currently are the only final voters - 100% - yet will become a minority voice for the standard. I am concerned that the priority of sound code requirements and enforceable language will become secondary to accommodating compromises among the $\frac{2}{3}$ other interests; a supermajority who will not be left to enforce the final standard. With the membership being marginalized, I cannot support this framework and urge you to reject it.

Sincerely,



Bridget Herring
Energy Programs Coordinator
City of Asheville, NC