

February 2, 2024

To: International Code Council

Re: For All Appeals

I am here to urge the board to deny all the appeals.

I have been in the real estate industry for over 40 years. I was involved in adaptive reuse of commercial buildings in the 80s and have been involved in residential brokerage for the last 30 years.

In both commercial and residential projects, the challenge with designing and building for efficiency is that the capital cost is borne by the developer and the savings are enjoyed by the user. This is why efficient design and systems must be legislated. Unless a level playing field is created with legislation, it creates a disadvantage to those developers who would build for efficiency.

Buildings should be sold according to a 'total cost of ownership' model not a sticker price model. If the playing field is leveled with legislation, then, in the overview, efficient buildings are better for developers and users because they are a better product - they are more comfortable and save money over the life of the asset. Efficiency becomes an INVESTMENT not a COST.

The marginal extra cost of construction is paid back with savings during operations and if the costs are not unevenly born by developers, they can all pass the marginal extra cost on to the users in the form of a somewhat higher purchase or lease price. This extra initial cost to users turns into a return on investment for the user because of the savings in operations - in addition to the enjoyment of a more comfortable building. Markets will adjust and ultimately benefit. Objections that markets won't adjust are not born out by past examples.

If the 'real costs' of efficient design and systems are not paid for at the point of use by the beneficiaries (and turned into investments because of the savings during use), then those costs of inefficiency

