

Sandra Vitzthum, Architect, L.L.C.

14 Loomis Street Montpelier, Vermont 05602 (802) 223-1806

June 8, 2023

Members of the Legislative Committee on Administrative Rules
State House, 115 State Street
Montpelier, Vermont

Dear Members of LCAR:

Thank you for listening carefully to concerned citizens and groups May 25th about the adoption of new RBES rules. I appreciate very much the opportunity to respond later today to new testimony by EFG and Public Service staff. I know time will be brief, so I would like to make some important points now.

- 1) **DELAYING ADOPTION IS NOT A YES OR NO ISSUE.** Proposed details that concern the builder and architect communities can be deleted.* This would allow Public Service to fulfill their obligation without risking significant harm to Vermont families and building owners.
- 2) **THE MODEL CODE, IECC, CONTAINS ALL THE ADMINISTRATION LANGUAGE WE ARE TRYING TO INCLUDE.** Public Service deletes nearly the entire section when it creates VT-RBES. *IECC's administration section is its foundation. IECC was never intended to exist without administration. It is worth asking: how many other states eliminate that section?*

Specifically in response to the letter submitted June 2nd by Ben Civiletti, forwarded to us yesterday:

- 3) **MR. CIVILETTI ACCURATELY DESCRIBES HEARINGS AND MEETINGS TO GATHER INPUT, BUT HE SKIPS MAJOR OBJECTIONS RAISED AT EVERY OPPORTUNITY ABOUT THIS ISSUE.**
- 4) **BUILDER TRAINING IS ISOLATED OUTSIDE CHITTENDEN COUNTY.** Public Service training IS NOT reaching a majority of builders, much less all builders. Public Service should share exactly how many in-person participants have been trained (adjusting for repeat participants), for how long, and how recently. We contend the small percentage of trained builders, and even smaller percentage whose work would pass a test, is shockingly low. We are thrilled to hear funding for more and better teaching is available. Public Service needs to overhaul its education, whether it's teaching 2020 or 2023/2024 RBES.
- 5) **TO REPEAT: THE ASSISTANCE CENTER DOES NOT HELP.** They cannot interpret, they cannot help a builder sort out what "other" means, they cannot even help a builder decide what to do. They really cannot help with existing building issues which is 80% of building stock in some parts of VT. All they do is literally read from the handbook.
- 6) **THERE IS NO LONGER A DOWN SEASON IN VERMONT CONSTRUCTION.** This is no reason to adopt in the winter. This suggestion reveals how little Public Service understands construction.
- 7) **THE BUILDING SCIENCE PASSAGE OFFERED IS, TO BE FRANK, COMICAL.** It is full of points that most builders already know and totally missing the details that builders open the handbook for in the first place. How would this statement be litigated when a building fails? Again this demonstrates how little PSD understands the issue.

Thank you very much, and I look forward to today's continuation.

Sandra Vitzthum, AIA

*Referring to Mr. Civiletti's letter:

- Increased insulation R-values for basements;
- tighter air sealing requirements;
- Requirements for efficient and balanced whole-house ventilation systems with heat recovery.