

01-11-2021:

As both an Energy Code Commercial Plan Reviewer and an Energy Code Commercial Energy Inspector for Arlington County, Virginia, I would like to voice my strong opposition to this move by ICC to shift the IECC from Code to Standard status. As THE boots on the ground in the race to make our individual jurisdictions, our states, our Country, and indeed our global environmental conditions more resilient and sustainable - from reviewing submitted building plans for energy code compliance, to inspecting the construction in order to ensure adherence to the approved plans - I can tell you that the ICC's reasons (highly technical nature, rapidly evolving technology, lack of debate time) for shifting the IECC from a Code to a Standard do NOT make sense, and are a move in the direction of weakening energy efficiencies within jurisdictions, and of emptying the stable of even the most basic regulations available to code officials who are trying to uphold their jurisdictional minimum standards for efficiency in Mechanical, Electrical/Lighting, Plumbing, and Envelope systems. IF individual jurisdictions wanted to weaken their efficiency standards and abandon their ability to hold builders to even the most basic efficiency requirements, they would NOT be adopting the energy codes year after year. What does ICC think has driven the United States' rapid and huge developments in LED lighting technology? In lighting control systems? And the adoption of variant refrigerant flow systems? The lowest, most basic bar set for efficiency requirements are the ICC building codes. And this has spurred our economy to greater prosperity, and greater innovation for years. And because the CURRENT energy code adoption process takes time and develops in complexity over the years, AS DO ALL CODES, that is precisely the reason the existing process should remain. Slowly evolving codes weed out the problematic, poorly worded or irrelevant sections over time. Rapidly evolving energy efficiency technological changes can READILY be picked up by jurisdictions if they so choose, by adopting any of the numerous ABOVE CODE references and standards which exist, such as IgCC, LEED, ASHRAE 90.1, ENERGY STAR, etc... In summary, shifting the Energy Code from Code to Standard status is a mis-guided idea, and would not achieve the stated objectives but instead would remove the floor of the energy conservation measures which we jurisdictions have consistently voted for since the IECC was created as its own Code.

Respectfully submitted,

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