



International Code Council
Board of Directors
500 New Jersey Avenue NW, 6th Floor
Washington, DC 20001

11 January, 2020

Dear ICC Board Members,

I am the Director of Resilience for Palm Beach County, Florida, and I would like to express my concerns about the motion that the International Code Council (ICC) is considering to eliminate the International Energy Conservation Code from the Governmental Consensus Process that develops the family of International Codes and create a new ICC standard for residential and commercial buildings. Making this change will disenfranchise a large constituency of stakeholders who make the ultimate decision to adopt or enforce building codes, while empowering building industry stakeholders. By removing the state and local government voice, the public interest purpose of the code development process will be substantially weakened.

For over a decade, ICC Governmental Members have supported measures to increasingly boost energy efficiency. These measures serve to decrease long-term costs for owners and tenants, as well as increase environmental sustainability, which is a goal of Palm Beach County and many other state and local governments. Diminishing the governmental voice in this process could allow that progress to falter.

I urge the ICC Board to drop this attempt to disenfranchise state and local governments in the code development process. At the very least, the ICC Board should detail the technical differences between the standards and codes development process and provide governmental members the opportunity to comment and vote on the change. This is a consequential decision that deserves broad stakeholder input and transparency.

Thank you for your leadership in establishing trusted and safe model building codes. I appreciate your dedication to a fair and open code development process.

Best regards

A handwritten signature in black ink that reads "Megan S Houston".

Megan S. Houston
Director, Office of Resilience

Office of Resilience

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