



February 5, 2024

Board of the International Code Council (ICC) and Appeals Board,

I am submitting this letter to urge you to reject appeals 23-01 through 23-09. These appeals attempt to remove valuable code provisions that address climate change. The proposed appeals digress the nation's progress around building efficiency, electric vehicles, and the numerous benefits of electrification.

To address the immediate threat of climate change, we need our new buildings to lead the way. If we do not provide infrastructure for EV charging or electric ready, and ignore the efficiency of our buildings, our new buildings will fail to provide for the needs of the occupants. If these appeals were to be approved, this would push unnecessary costly retrofits upon building owners and increase utility bills. Many states and jurisdictions either have or are pursuing Building Performance Policies, and we need to make sure our new buildings are not failing our nation for existing building requirements and for ways to address climate change.

The IECC addresses life safety measures, and the code must provide for the opportunity to encourage electrification. All-electric buildings and homes are healthier and have safer indoor air quality. Encouraging heat pumps throughout the code means more buildings and homes will have more reliable, efficient heat because heat pumps move heat instead of creating it, achieving 250%-300% efficiency. Extreme heat is a direct result of the warming of our planet, and many residents throughout the country do not have adequate cooling. Heat pumps provide safe and efficient cooling, especially for those in low-income neighborhoods who are disproportionately affected by Urban Heat Island effect.

The draft 2024 IECC codes went through a rigorous consensus process on the current draft language. I was a member of the subcommittees for the Commercial Modeling, Whole Building Metrics, and Zero Energy Subcommittee and the Residential Electrical Power, Lighting, Renewable Energy Generation, and Storage Subcommittee. I can validate the amount of time, expertise, and collaboration, that went into drafting the IECC code language. I urge you to reject these appeals.

Thank you,

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