



International Code Council
Board of Appeals

Dear International Code Council Appeals Board,

The Town of Eagle urges you to reject the 2024 IECC Appeals 23-01 – 23-09. The associated measures of electric readiness, EV charging readiness, efficient and resilient code requirements, stretch code appendices, and all-electric appendices were accepted in the final 2024 IECC draft after rigorous analysis and consensus-driven decision making. There is no process or procedural issues on which to appeal.

In addition, many states and cities, including Colorado and the Town of Eagle, use the IECC code standards as the primary reference code and model code. In fact, stakeholders across Eagle County recently participated in a code cohort aimed at aligning code adoption across municipalities and in accordance with the model IECC standards (at the time, the 2021 IECC) in partnership with our local Climate Action Collaborative. The implementation entities look to the IECC for higher ambition and innovation in energy standards. If the IECC 2024 code removes these appealed measures, states and localities will have additional administrative burden to develop higher standards or simply regress on their energy efficiency goals. That would have an outsize impact, especially when a town such as ours has aggressive climate action goals: net zero carbon emissions for town operations by 2028 and net zero carbon emissions for the Eagle community by 2030.

The measures being appealed are extremely valuable to building occupants and our communities as a whole. Electric readiness helps everyone transition to all-electric systems, especially those making low incomes. Reaching our net zero goals without including of our full community is not an option, and we do not want to see our most vulnerable residents suffer as a result of the appeal. Without electric-ready wiring and panels that make swapping to electric appliances easy and affordable, low-income building occupants risk bearing the brunt of the financial impact of these appeals.

EV charging readiness in new buildings is critical as electric vehicles scale up on the roads and require charging infrastructure. It has been shown that including EV charging readiness at initial construction is three times more cost effective than it is at the point of retrofit. With construction booming in our community and nearby mountain towns, it is critical that these measures are looped into new construction projects instead of left for a later time.

Efficiency measures being appealed provide numerous benefits, from protection during natural disasters to cost savings. In extreme climates like our own, protecting people from dangerous outdoor conditions saves lives. In a climate with high risk of wildfire, it is essential that new buildings are better insulated and sealed. This provides the co-benefit of cost savings for residents as well, something of the utmost importance as housing affordability has plummeted in recent years.

Ultimately, these appeals work against the direction of experts and the consensus process. They are in opposition to our goal to improve the quality of life for our residents, and will make it difficult, if not impossible, for us and other communities to achieve our net zero goals if approved. We urge you to reject the 2024 IECC Appeals 23-01 through 23-09 and keep the efficiency, affordability, and decarbonization measures in the 2024 IECC.

Sincerely,
Kira Koppel
Sustainability Specialist
Town of Eagle