Dear ICC Board,
As an Architect and Planner with a long-standing concern for the role of the built environment in protecting human and environmental health and addressing climate change, I want to echo the concerns expressed by the NRDC and Green Building Community to protect the broad public process which has allowed us to make steady progress in improving the performance of our buildings in each code cycle. By having a broadly participatory process with good representation by building professionals, developers, environmentalists and local government officials we have achieved measurable decreases in building energy and water use while often improving overall comfort, function and convenience for building users and owners. We need to continue this forward progress.

I am particularly concerned at the hurried effort to reduce public participation in Code Development prior to Inauguration of a new US President who has announced his intention to pursue more sustained effort to address Climate Change. The pandemic already divides our attention--to make major changes in process over the holidays further reduces the consensus on which these code iterations should be based.
Echoing the arguments of the NRDC against hasty action:

- We've seen no justification from the ICC Board about why such a dramatic change is necessary, and especially how it will result in a better outcome. We do not understand the purpose of disenfranchising the voices of thousands of ICC governmental members, when the process as it stands has clearly been successful at developing a strong and relevant final code. There has been no assurance from ICC that the code will not be immediately rolled back and made less efficient— which we know some stakeholders want. Builders have made proposals in every recent code development cycle that would reduce the efficiency of the code. The governmental voting members have always soundly rejected those proposals, but this process would not contain those kinds of checks and balances. It's highly likely that the committee will be made up of members with a vested financial interest in the code. While the committee must be "balanced," ICCappears to have a lot of discretion as to how that balance is defined. There's no guarantee whatsoever that

efficiency advocates or pro-environmental interests will be represented on the committee. Whether or not progress will be made will depend highly on the makeup of the committee, as there is no stated commitment to improving the efficiency of the code.Public participation helps to ensure that the code is efficient but also equitable, and it is not clear how the general public will be able to weigh in on decisions on a regular and timely basis.

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