

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

January 11, 2021



To the International Code Council Board of Directors:

I am writing on behalf of Architecture 2030 to express our opposition to the ICC Board's recent proposal to replace our national model energy code with a new ICC energy standard. Architecture 2030 strongly urges the ICC Board to reject this proposal to protect the integrity of the ICC code development process and to ensure the full participation of the ICC's Governmental Members in the development of our national model energy code.

This fall, the ICC Board of Directors directed its Long-Term Code Development Process Committee (LTCDDPC) to consider a proposal to remove the International Energy Conservation Code (IECC) and Chapter 11 ("Energy Efficiency") of the International Residential Code (IRC) from the Governmental Consensus Process for code development. This proposal sought to replace them with a new energy efficiency standard developed through ICC's Standard Consensus Procedures. In the December 16 edition of its online newsletter ICC Pulse, the ICC published additional details of the proposal and a call for public comments due by January 11. The newsletter also reported that the ICC Board would hear verbal testimony from interested stakeholders the week of January 18.

Architecture 2030 strongly opposes this proposal for several reasons:

- **Limited participation/Transparency:** According to ICC's Council Policies that set the rules for the development of codes and standards, the Governmental Consensus Process leaves the final determination of code provisions in the hands of public officials who, with no vested financial interest, can legitimately represent the public interest. The ICC's Standards Consensus Procedures, however, will leave the final determination of a standard in the hands of a committee of 30 to 40 people.
- **Climate impact:** The ICC's Governmental Members have repeatedly chosen to improve the energy efficiency of the IECC over the past five code development cycles. Using the 2006 edition of the IECC as a baseline, we expect the soon-to-be-published 2021 IECC to increase energy efficiency by almost 50 percent in residential and commercial buildings. During this period, the Governmental Members have rejected all proposals to roll back or trade away energy efficiencies in the code. Others who did not "win" on the issue are proposing this "change" to further undermine the process in an attempt to overturn their perceived losses.

- **Inconsistency:** In the ICC Pulse, the ICC states that the Standard Consensus Procedures “allow for more timely consideration and an in- depth investigation of energy improvements without the time limits imposed in the code hearings.” Should the Governmental Consensus Process no longer be appropriate for the development of the IECC, the ICC should make clear why that consensus process remains appropriate for the development of the International Building Code (IBC), the International Residential Code (IRC), and the other 11 codebooks that are part of the I- Codes.
- **Limited input and deliberation:** State and local governments have successfully participated in the ICC Governmental Consensus Process for over two decades, yet the ICC Board has not solicited their feedback on this proposal. The Board should not fast-track its consideration of such a drastic change that would end the guaranteed participation of its Governmental Members in developing the national model energy code without asking for either their input or approval.

Architecture 2030 urges the ICC Board to reject this proposal.

Sincerely,

Edward Mazria, FAIA  
Founder and CEO, Architecture 2030