Good Evening,

As a government official that participated in the most recent IECC development process for the 2021 model code I am submitting the below comments in regards to the proposed changes to the standard development process. As a local government official I find it incredibly important that my voice is represented in a process that will greatly impact our local community.

1. We urge the ICC to continue the current process in developing the IECC code, which allows local government officials to vote on updates. Our local government officials are knowledgeable on how the code is administered, so it is crucial that they are involved in the decision-making process. Code officials vote with the public’s interest in mind, rather than financial interests.

2. 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.

3. If this moves forward, government officials will have little control over the substance of the energy code, to the detriment of the cities and states that rely on the IECC as a crucial policy tool. Buildings are responsible for more than two-thirds of carbon emissions in the Chicago region and we need robust energy conservation codes to achieve a zero-carbon economy by 2050. Governmental officials understand that and have used their votes in favor of efficiency, innovation, and a better future for all. The ICC Board must not silence their voices.

4. It’s highly likely that the consensus committee charged with developing ‘standards’ will be made up of members with a vested financial interest in the code. There’s no guarantee whatsoever that local government will be represented on the committee.

5. 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.

Thank you for your consideration and I hope that no changes are made that limit local and state government ability to participate in the code development process.

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