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January 8, 2021

ICC Board and Blue Ribbon Committee
International Code Council

RE: The IECC and Chapter 11 of the IRC update through the ICC standards process

Dear ICC Board and Blue Ribbon Committee Members:

On behalf of myself, and the Resource Conservation team within The City of Fort Collins Utilities, we are reaching out to express our concern at the International Code Council (ICC) proposal to eliminate participation of Governmental Member participation in the voting process for the International Energy Conservation Code (IECC). We are current members of the ICC and we recently participated as voting members. This was not a responsibility we took lightly. We're concerned that the change in code to an energy standard and the creation of a consensus committee in determination of the standard can only undermine the will of the voters. We feel this could also potentially open the process to influences from groups that are not as directly responsible for the adoption, administration and enforcement of the very standards or codes being adopted. We are aware there was opposition to the 2021 IECC from a number of groups.

Within our department at utilities we often analyze the impact that building energy codes have on the increase in efficiency within the community. We undertake this analysis as a determination of what measures need to be taken to reduce greenhouse gas emissions, improve community resilience and build a more healthy, equitable and affordable future for our community. It seems that this, along with our in-depth knowledge of building codes, qualifies us as the very group of individuals who should weigh in on the outcome of the IECC. Stripping us of this only serves to delegitimize the very code so many look to as the future of building efficiency.

Please reconsider the change in process and allow the participation of Governmental Member Voting Representatives in future IECC development. Doing so will only increase transparency and insure a fair and equitable process.

Sincerely,

A handwritten signature in black ink, appearing to read "Brad Smith".

Brad Smith
Energy Code Conservation Specialist