



CITY OF SAINT PAUL

Mayor Melvin Carter

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Dear ICC Board Members,

On behalf of the City of Saint Paul, I write to express the City of Saint Paul's strong opposition to using a standards development process, rather than the current code development process, to update the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC).

The current code development process has been extremely successful in responding to the needs of the communities that enact and enforce the codes, resulting in significant energy efficiency improvements over time, particularly in the most recent code development cycle. Buildings are responsible for more than 40 percent of U.S. carbon emissions, and we must accelerate efforts to achieve a zero-carbon economy by 2050. Saint Paul is working on several fronts to reduce energy use in buildings, reduce emissions, lower operating costs, and attempt to ensure a habitable planet in the future. A continually improving code is critical to this end. Moving to a standards development process will stifle our voices as governmental voting members and make meaningful participation significantly more difficult for Saint Paul.

One of the most critical aspects of the code development process is that we, as government officials, have a say in what to include in the code. This is important because our votes ultimately ensure that the code serves the policy and technical needs of our communities – not the needs of special interests like builders or industry groups. Voting members like ours have been successful at making large efficiency gains in recent years and preventing the passage of proposals that would have weakened the code, leading to higher energy bills and more waste.

The energy code must continue to advance and require greater efficiency to serve the needs of cities and states throughout the country. The proposal at hand leaves governmental members virtually powerless to either improve the code or ensure that gains made to date are not reversed. We cannot support this dramatic change to the IECC process.

Sincerely,

Russ Stark
Chief Resilience Officer