

January 11, 2021

To the International Code Council Board of Directors,

On behalf of the City of Philadelphia, we are writing to express our objection to the proposal by the International Code Council Board of Directors to eliminate the International Energy Conservation Code and replace it with a standard.

This action would remove a direct avenue of participation for local governments like ours who have participated in code development processes for years. The process of developing a standard would remove the final determination of code provisions from the hands of the building safety, code, and qualified governmental professionals who are tasked with implementing its decisions daily, likely shifting to a process more heavily influenced by industry professionals with a vested interest in the content of the standard. The ICC code development process appropriately provides input opportunities to these stakeholders while putting final decisions in the hands of qualified governmental professionals whose jurisdictions must ultimately adopt and enforce the code.

We are concerned that a change this impactful has been considered with little consultation with the Governmental Members and Governmental Member Voting Representatives, the individuals and entities that will be most impacted by the change.

We are also concerned about our ability to work with the IECC if a standard is enacted because we would need to invest a significant amount of time analyzing and understanding how to utilize a standard as opposed to a model code. During a time when local governments are facing budget and staffing shortfalls, the ICC should not be considering changes that would make participation and use of ICC products more onerous.

We have valued our participation in ICC and hope to continue being active members in the future. Thank you for the opportunity to provide this input.

Sincerely,

Christine Knapp
Director
Office of Sustainability

Elizabeth Baldwin
Chief Code Official
Department of Licenses & Inspections