

From: Eric Fried <friedeb@co.larimer.co.us>

Sent: Tuesday, December 29, 2020 12:59 PM

To: Member Input <memberinput@iccsafe.org>

Subject: Public comment on the proposed change to the IECC Code Update Process

I have read your email proposing major changes to how we review, adopt and update energy codes. As far as I know, sending this email is how I submit comments on the proposal. Please acknowledge receipt of this email and inform me if there is some other form or process I need to complete to have these comments included for committee consideration.

I do not understand why the review/approval process for this code - and only this I-code - is suddenly in need of a complete overhaul. So suddenly in fact, that this recent proposal has never been discussed by the general ICC membership at an annual meeting or conference. Any purported need for a radical overhaul seems to me to be a reaction to the outcome of the votes on the 2021 IECC, in which an unprecedented number of governmental members participated through the on-line processes ICC made available. The process worked splendidly! The appeal filed by certain industry groups to overturn the outcome seems to boil down to this point: they do not like the results. Since being on the losing side of a fair voting process could not be grounds for appeal, they naturally claimed instead that somehow the process was flawed and in need of alteration. I disagree. The process was fair, no matter how the final vote turned out.

Please understand that changing the process in these circumstances, to one that will decrease rather than increase the democratic input of the membership, could put the credibility of ICC and our I-codes in jeopardy. That credibility has been gained over decades and is our most precious asset. It would be a huge mistake to squander it. I urge you not to do that in the strongest possible terms.

Some people already feel that industry groups have a disproportionate influence over the code process, through the number of seats allotted on code committees. That is why so many proposals only became 2021 code through an overwhelming vote of the membership, after the committee stage of the process. That power imbalance bodes poorly for public confidence that the new energy code standard committee will be fairly balanced and not also skewed to the desires of industry groups.

There is also no assurance that the new standard will not roll back the recently adopted code changes that some industry groups find objectionable. That may in fact be the main driver of the proposed process change. Yo-yoing back and forth from one code to another makes my job harder, as well as confusing and expensive for contractors and the general public.

I understand that energy-efficiency requirements increase up-front costs in the short-term, and that every code change has a cost that makes it harder to provide affordable housing. These code changes will result in energy/cost savings and increased comfort over time, so creative financing mechanisms could and should be developed through a public-private partnership.

Finally, here is the real bottom line: **we are in a climate crisis.** Our time to act to prevent catastrophic climate change is rapidly running out. Increased energy efficiency requirements will reduce the production of greenhouse gases, slow global warming, and thereby give my children, your children, their children, our children, a fighting chance at living in a habitable biosphere rather than a dystopian hellscape. I cannot think of any consideration more important than that one.

For the record, I speak for myself as a 30-year veteran code administrator, not for my jurisdiction, whose governing body has issued no formal opinion on the proposed process change.



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