



Dominic Sims, CBO Chief Executive Office
International Code Council
500 New Jersey Ave
Washington, DC 20001

Greg Wheeler, CBO President
International Code Council
9500 Civic Center Drive
Thornton, CO 80229

Dear Messrs. Sims and Wheeler,

Kimberly Eaton-Pregler
Executive Vice President

Executive Committee

Michael Garabedian
Garabedian Properties
President

Heather Laminack
Ferrier Builders
Immediate Past President

Cheryl Bean
B Smart Builders
1st Vice President

Diane Nix Kessler
DMKProperties, LLC
2nd Vice President

Steve Corradi
Bloomfield Homes
Secretary/Treasurer

Jared Canter
Pella Windows & Doors
Associate Vice President

Amy Burns
Ferguson Enterprises
Associate Vice President

100 E. 15th St. Ste. 600
Fort Worth, TX 76102

817-284-3566 Office
817-284-6465 Fax

www.gfwbatx.com

On behalf of the Greater Fort Worth Builders Association, I write to express strong support for transitioning the development of the International Energy Conservation Code (IECC) from the current governmental consensus process to an American National Standards Institute (ANSI) committee-based process. The suggestion for this change originated from the ICC Board of Appeals after it heard and considered the many issues that were raised in the appeals filed on the 2019 ICC Group B results.

In addition, the ICC Board Committee on Long Term Code Development Process also determined that ICC should consider changing the development of the IECC committee-based standards process.

There are multiple reasons this change is needed, including but not limited to;

- It will improve the timing and ICC code development process for all of the codes by streamlining the process, while maintaining their rigor and validity.
- The energy code is getting more complex, with each iteration of the IECC requiring more discussion and modifications of the proposed changes. An ANSI committee approach will allow for more deliberative discussions, resulting in a more balanced and cost-effective code.
- The Group B process showed that the online vote allows for political manipulation of the outcome. Changing to an ANSI process will eliminate this possibility and better ensure the results are representative of the broader ICC membership.
- The committee responsible for developing the code via the ANSI process can be more responsive to conceptual changes to the codes as well as resolve potential conflicts between related changes.
- The committee, with Builder representation, can offer valuable input in a more deliberative process from the very professionals responsible for constructing these homes. Builders can offer insight on what works and doesn't work in the field.
- Consideration of updates will include clear objective criteria when evaluating options for code inclusion, such as economic payback to homeowner, unintended consequences, effects on affordable housing, alternative options, etc....

It is critical that as ICC proceeds with the development of the 2024 I-Codes, the process be fair and include representation of a balanced committee of stakeholders. Therefore, we strongly support the change and believe that it will greatly improve not only the process, but also the practicality and usability of the energy code.

Sincerely,

Mike Garabedian, GFWBA President

