



Friday, January 8, 2021

**Re: Climate Solutions comments on International Code Council proposal**

Dear Mr. Sims, Mr. Wheeler, and ICC Board of Directors,

Climate Solutions thanks you for the opportunity to submit comments to the International Code Council (ICC). Climate Solutions is a clean energy nonprofit organization working to accelerate clean energy solutions to the climate crisis. The Northwest has emerged as a hub of climate action, and Climate Solutions is at the center of the movement as a catalyst, advocate, and campaign hub.

We have recently become aware of the ICC's interest proposal to introduce a new ICC-appointed committee for the update of the commercial and residential provisions and Chapter 11 of the International Residential Code (IRC). **We strongly urge the ICC to maintain the existing democratic governmental consensus process that is carried out by governmental civil servants whose mandate is to serve their constituents, rather than by a committee that would include representatives from industry trade groups that have a clear financial interest in the outcomes of code updates.**

Updates to commercial and residential energy codes are a crucial mechanism for transitioning to a zero-carbon future for the buildings sector. Since the 2009 International Energy Conservation Code (IECC), local, state, and federal officials have boosted residential and commercial efficiency by nearly 50% over 2006 levels, and have rejected all efforts to roll-back or trade away efficiency.

We understand that the ICC's concerns about the governmental consensus process stem, in part, from a need for urgency given the global climate crisis. However, shifting to an appointed committee will not serve decarbonization goals. Indeed, the 2021 IECC, which was developed by a historically successful and inclusive online voting process, will cut carbon emissions by 50 million metric tons per year by 2030. **We urge the Council to prevent industry groups from interrupting the decarbonization gains that the IECC will likely continue to make through a governmental consensus process.**

Sincerely,

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