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 of 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,

Deepa Sivarajan
Washington Policy Manager
Climate Solutions

Vladimir Gutman-Britten
Washington Director
Climate Solutions