



Board of Directors
International Code Council (ICC)
500 New Jersey Avenue, NW (6th Floor)
Washington, DC 20001

January 11, 2021

To the International Code Council Board of Directors:

I am writing on behalf of Green Building Alliance (GBA), a nonprofit organization located in Pittsburgh, PA to express our opposition to the ICC Board's recent proposal to replace our national model energy code with a new ICC energy standard. GBA's mission is to advance innovation in the built environment by empowering people to create environmentally, economically, and socially vibrant places. GBA envisions a world where every building and community is sustainable so that every person can thrive. Founded in 1993, GBA currently serves 26 counties within Western Pennsylvania with a concentration of activity within Erie and Allegheny Counties. We strongly urge the ICC Board to reject this proposal to protect the integrity of the ICC code development process and to ensure the full participation of the ICC's Governmental Members in the development of our national model energy code.

As an organization we oversee both the Pittsburgh 2030 and Erie 2030 Districts which sets goals for high-performance building by committing landmark properties to 50 percent reductions in energy use, water consumption, and transportation emissions by 2030, while improving indoor air quality. GBA unites the region's most influential developers, investors, and policymakers to dramatically advance sustainable solutions, establishing Western Pennsylvania as an international leader in high-performance building because we acknowledge the imperative role the built environment has on reducing carbon emissions. GBA believes a stronger building code based on energy efficiency and carbon dioxide reduction is paramount in addressing the impacts of climate change. The ICC's Governmental Members have repeatedly chosen to improve the energy efficiency of the IECC over the past five code development cycles. Using the 2006 edition of the IECC as a baseline, we expect the soon-to-be published 2021 IECC to increase energy efficiency by almost 50 percent in residential and commercial buildings which is the current standard already being voluntarily committed to with a robust network of 556 properties in the Pittsburgh region alone.

More importantly, shifting from the Governmental Consensus Process would take the decision-making control away from public officials who have no vested financial interest other than to represent their community's public interest. The change to the ICC's Standards Consensus Procedures, however, leave final determination of a standard in the hands of a committee of 30 to 40 people. State and local governments have successfully participated in the ICC Governmental Consensus Process for over two decades, yet the ICC Board has not solicited their feedback on this proposal. The Board should not fast-track its consideration of such a drastic change that would end the guaranteed participation of its Governmental Members in developing the national model energy code without asking for either their input or approval.

In conclusion, GBA urges the ICC Board to reject this proposal and focus its attention on continuing to increase industry stakeholder and public participation in the code development process. Thank you for the opportunity to provide our input.



**Green
Building
Alliance** Sincerely,

Megan Zeigler
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Pittsburgh, PA