



STATE OF WASHINGTON
DEPARTMENT OF COMMERCE

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January 11, 2021

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

Dear ICC Board Members,

The Washington State Department of Commerce is writing to voice our concerns about the changes that the International Code Council (ICC) Board is considering for the International Energy Conservation Code (IECC) and the process of its development.

We believe your consideration to remove the IECC from the Governmental Consensus Process that develops the family of I-Codes undermines the integrity of the process. The proposed approach does not allow for the full range of state government views. Removing the state and local government voice, the public interest purpose of the code development process will be substantially weakened. These actions will disenfranchise a large constituency of stakeholders who make the ultimate decision to adopt and enforce building codes, while empowering building industry stakeholders to be successful.

Replacing the IECC with an ICC standard raises similar concerns. The benefits of improving building efficiency are far more comprehensive than energy savings alone. These benefits extend to long-term building affordability for owners and tenants, improved indoor air quality, reduced operating costs for low-income households, increased property values and power grid stability. Eliminating the IECC and replacing it with an ICC standard will undermine uniform and broad adoption and enforcement of energy codes nationally.

We strongly urge you to leave the final determination of future IECC content in the hands of your Governmental Members. This is a consequential decision that we urge you to not move forward in adopting.

Thank you for your consideration,

Michael Furze, Assistant Director, Energy Division
Washington State Department of Commerce