



12/28/20

International Code Council
Dominic Sims, CEO
500 New Jersey Avenue, NW
6th Floor, Washington, DC 20001
via email

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

We were recently made aware of ICC's interest and consideration in replacing the existing democratic governmental consensus process with a new ICC appointed committee for update of the commercial and residential energy provisions in the IECC and Chapter 11 of the International Residential Code (IRC).

The ICC web site specifically states: *The International Code Council develops construction and public safety codes through a governmental consensus process. **The governmental consensus process leaves the final determination of code provisions in the hands of public safety officials who, with no vested financial interest, can legitimately represent the public interest.** This system of code development has provided the highest level of safety in the world for more than 90 years.*

Government civil servants are best positioned to carry out a democratic process that represents the interests and values of their residents, not industry trade groups or other groups such as fossil fuel trade associations, manufacturers or insurance companies, who have a clear vested financial interest in the outcome of code provisions. However, the proposed ICC consensus procedures include a proposed ICC appointed committee represented by the very same committee categories that are most likely to have a financial interest.

While we understand the Blue-Ribbon Committee's desire to allow more timely consideration of energy code changes, we feel the standard 3-year code cycle provides sufficient time for review.

We have strong concerns about this proposal and urge you to maintain the existing governmental consensus process to ensure the highest level of legitimacy, diversity in expertise, and local representation.

Sincerely,

Jessica Finn Coven
Director, Office of Sustainability and Environment

Nathan Torgelson
Director, Department of Construction & Inspections