



January 11, 2021

Dear International Code Council Board of Directors,

The City of Aspen Environmental Health & Sustainability Department, specifically the Climate Action Office, greatly valued participating in the 2021 International Energy Conservation Code (IECC) development process as a Governmental Member via online voting in late 2019. We were encouraged to see that the process overwhelmingly supported establishing a more energy efficient model code. With an increase of 8% to 14% in energy savings compared to the 2018 iteration of the IECC, the 2021 IECC moves building energy efficiency in a positive direction.

However, we are deeply troubled by the recent news that the International Code Council (ICC) Board of Directors is considering a proposal to alter future IECC development in favor of an ICC standards process, as opposed to a code process. **We strongly oppose this change and implore the ICC Board of Directors to reject this proposal.**

While proponents of a standard argue that government staff and officials are not sufficiently knowledgeable on the issues related to the IECC, we assert that local Governmental Members are the best positioned to understand the energy efficiency needs and wants of the local community and industry. Transitioning to a standard could allow industry lobbyists to inform the IECC to their benefit and would disenfranchise Governmental Members, who have a significant stake in the development of IECC provisions. After all, local building safety inspectors, code officials, and other qualified governmental professionals are the ones responsible for implementing code provisions. Accordingly, we believe that the IECC process should remain a democratic code process and Governmental Members should continue to be decisionmakers.

Furthermore, in Aspen, 58% of community greenhouse gas (GHG) emissions are produced by buildings. As such, the energy efficiency improvements in the 2021 IECC are critical to reining in the lion's share of our GHG emissions in new buildings and remodels. The 2021 IECC will play a similarly important role in other communities. Given the narrowing window to reduce GHG emissions globally and mitigate some of the most severe impacts of climate change, the improvements made in the 2021 IECC are more necessary than ever. Transitioning to a standard for the IECC furthers the potential for industry bias and a reduced prioritization of energy efficiency. The shift to a standard could compromise gains in energy efficiency and future GHG emissions mitigation by reducing the accessibility of a readily adoptable energy efficiency code. Thus, a standard may negate the current benefits of the IECC in favor of industry preferences.

To reiterate, we urge the ICC Board of Directors to maintain the current code development process for the IECC that includes Governmental Members and reject the proposal for a standard. Doing so would support the democratic development of quality codes moving forward and allow for necessary improvements to energy efficiency in buildings.

Sincerely,

City of Aspen Environmental Health & Sustainability Department, Climate Action Office
Ashley Perl, Climate Action Manager