

VILLAGE ARCHITECTS

OF KEY BISCAYNE, INC

ARCHITECTS, PLANNERS, INTERIOR DESIGN & PURCHASING

11 January 2021

RE: International Codes Council (ICC) CONSIDERING CHANGING THE IECC TO A STANDARD

Dear ICC Board,

The AIA is opposed to the ICC's attempt to turn the IECC into a standard. We stand in opposition for several reasons but perhaps the most important is that if they change the IECC to a standard, the development process will become more insular, opaque, and slow. Any move in this direction is entirely contrary to AIA's stated public policies on code development. The following are additional reasons for the AIA's opposition to this move.

- Standards are not codes. Standards are intended for use by manufacturers or service providers to create homogenized criteria for how they qualify, produce, install materials, and test products in a consistent way. Codes then examine the products based on standards (wood, steel, concrete, fire suppression, alarm systems, HVAC, etc.) and determine when, where, and how they are appropriately used to provide the minimum public safety and health of the public.
- In 2000 shortly after the ICC was formed, AIA reviewed the merits of the ICC codes against those of the National Fire Protection Association (NFPA). We determined then that the ICC family of codes provided a package of Comprehensive, Coordinated, and Contemporary (C3 Report) codes that would be reliable for architects.
- More recently, in cooperation with AIA, the ICC developed the International Green Construction Code (IgCC) as a part of a package of codes in 2012 and 2015. Over time the ICC became disillusioned with the cost of development and production of the IgCC and asked ASHRAE to take over the code's technical provisions through its 189.1 committee efforts. AIA has attempted to continue working to advanced green standards. Still, the ASHRAE Standards Committee's process is less open and inclusive, and there are a minimum number of architects and code officials actively involved and eligible to vote. We are concerned that the architect's voice will be diluted, and the critical work to strengthen and improve energy efficiency will be compromised with a standard development process.
- ICC governmental voting members (code officials and building inspectors from jurisdictions across the country) will never again be able to weigh in on the acceptability of a proposal. They are thus rendering those with the most insight into energy codes voiceless.
- In the ICC's standard development procedures, a proposal can be held up or denied by a vote of one-third of the committee. This will surely allow those who wish to hinder advancements in the energy code a friendlier environment.
- Finally, standards referenced in the I-Codes are not subject to code change review with a vote by the membership; therefore, it is incorporated automatically into the new code

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when the standard is updated.

Overall, changes to the process will take away AIA's ability to actively engage with ICC membership to improve the codes and its referenced standards. AIA believes this change would dramatically disenfranchise the communities that depend upon ICC to deliver valuable and credible codes and referenced standards. AIA has worked diligently with our state and local components and members to shift the adoption of three regional codes to a single code for use in the United States. ICC has significantly benefited from that effort. Changing the packaging of the codes to restructure code development is a disservice to our organization and to the communities we serve.

Sincerely,



Robert John Graboski
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AIA Miami Chapter President