



MARYLAND BUILDING OFFICIALS ASSOCIATION

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January 11, 2021

RE: Public Comment on IECC Proposed Standard Development Process

Dear ICC Board of Directors:

Good morning, my name is Donald Mock and I am the current President of the Maryland Building Officials Association (MBOA). I am submitting this testimony on behalf of the Board of Directors of MBOA. The current Board of Directors provide the following credentials and ICC committee experience:

Licensed Professional Engineers

Licensed Architect

SEHPCAC

Commercial Energy Code Hearing Committee

ADD-Hoc for wall bracing

Swimming Pool and Spa Code hearing committee

Sustainability Membership Council

Emerging Leaders Membership Council

IRC Interpretation Committee

Code Correlation Committee

Former ICC Board of Directors

ICC Instructor

I am providing the following written testimony about the proposed Standard Development process for the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC). I have been involved with the development of the Energy Codes since 2012 and I am very concerned about moving the adoption of the Energy Codes to a Standard Development Process. Should this be approved the membership will lose the ability to comment and provide input through the code hearing process that is currently used for most of the ICC codes. We, as Building Officials and experts in this field, need to be involved in the process because ultimately it is our responsibility to enforce the codes that are adopted. Building Officials and Inspectors look at all the proposed code changes to discuss what is being proposed and whether or not it's enforceable, as well as beneficial to the public. Our perspective brings great value to this process and I see this being lost in a Standard Development process.

In the past there has been a lack of input into the energy code, from Building Officials, in part due to the ability to gain knowledge in this area. That has changed since the adoption of the I-codes., We are seeing Departments provide more training and hiring more people with expertise in Energy Codes. It is very important to maintain input from the Code Officials with proposed code changes to the Energy Code from across the country.

Energy is very dependent on the region and location and better input can be gained from all regions through the current code adoption process. Input, like this, cannot be obtained in a Standards Development Process as you will hear from a select group located in the northwest United States and is not knowledgeable in what is best down South.

If the board decides to move forward with moving the Energy Codes to a Standard Development Process, I hope this is not expanded to moving the other ICC Codes to this process. We definitely oppose moving any other ICC Codes to a Standard Development Process. Another way of addressing the issues we are currently seeing is to look at re-evaluating the current definition of a Governmental Voting Member to make sure the Governmental members voting are actual code officials. I hope you take this into consideration.

In conclusion, The Maryland Building Officials Association is not in favor of changing the way the Energy Codes are currently adopted to the Standard Development Process. The adoption of these codes should be maintained under our current method of the code hearing process.

Sincerely,

Donald L. Mock, P.E.
President
Maryland Building Officials Association