



CITY OF PITTSBURGH
OFFICE OF THE MAYOR
MAYOR WILLIAM PEDUTO

January 8, 2021

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

Dear Members of the International Code Council Board,

On behalf of the City of Pittsburgh, I am writing to express strong opposition to updating the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC) using a standards development process, rather than the current code development process.

If this moves forward, government officials will have little control over the substance of the energy code, to the detriment of the cities and states that rely on the IECC as a crucial policy tool. Buildings are responsible for more than 40 percent of U.S. carbon emissions, and we must pick up the pace of progress in order to achieve a zero-carbon economy by 2050. Better new buildings are a critical component of this goal. Governmental officials understand that and have used their votes in favor of efficiency, innovation, and a better future for all. The ICC Board must not silence their voices.

The current code development process has been extremely successful in responding to the needs of the communities who enact and enforce the codes, resulting in significant energy efficiency improvements over time, particularly in the most recent code development cycle. A continually-improving code is critical to reducing the energy use and carbon emissions of our city's and our nation's buildings, in order to ensure affordable energy bills and a habitable planet. Moving to a standards development process will stifle our voices as governmental voting members and make meaningful participation significantly more difficult for the City of Pittsburgh.

One of the most important aspects of the code development process is that we as government officials have the final say in what is included in the code. This is important because our votes ultimately ensure that the code serves the policy and technical needs of our communities – not the needs of special interests like builders or industry groups. Voting members like ours have been successful at not only making large efficiency gains in recent years, but also from preventing the passage of proposals that would weaken the code, leading to higher energy bills and more waste.

Changing to a standards development process would remove this critical system of checks and balances, resulting in a code that is completely out of the hands of the governmental members who use the code to ensure the safety, health, and sustainability of our jurisdictions. As ICC members, this change is unacceptable. The value of the current system is that it prioritizes the values and voices of the end users of the code, who may have very unique positions as compared to other of our governmental members will have less weight and the thousands of voting members will have no realistic path to participation in code development.

Among the family of I-Codes, the IECC has the most profound impact on long-term local policy – and it therefore makes little sense to limit governmental officials’ voices in the process. The energy use of buildings is directly related to not only building occupants’ health, comfort, and welfare, but also impacts carbon emissions and the health of Pittsburgh and our planet. These implications affect the goals and obligations of multiple departments within our city. Different cities – or even different departments within cities – have differing goals and priorities, which would simply not be represented by a single “representative” committee member. The current voting system, which weights voting membership by jurisdiction size, ensures that all perspectives can be represented.

The energy code must continue to move forward and become more efficient to serve the needs of cities and states throughout the country. The proposal at hand offers no protections against repealing the efficiency progress made over the past few code cycles, and leaves governmental members powerless to either improve the code or ensure that it is not made less efficient. We cannot support this dramatic change to the IECC.

Sincerely,



William Peduto
Mayor of Pittsburgh