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Raymond P. Rogina *Mayor*  
Mark Koenen, P.E. *City Administrator*

January 11, 2021

To whom it may concern,

It has come to our attention the ICC is proposing to use a shortened process to develop the IECC without input from local government officials who are the very ones to administer this code.

We urge the ICC to continue the current process in developing the IECC code, which allows local government officials to vote on updates. Our local government officials are knowledgeable on how the code is administered, so it is crucial that they are involved in the decision-making process. Code officials vote with the public's interest in mind, rather than financial interests.

We do not understand the purpose of disenfranchising the voices of thousands of ICC governmental members, when the process as it stands has clearly been successful at developing a strong and relevant final code.

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 two-thirds of carbon emissions in the Chicago region and we need robust energy conservation codes to achieve a zero-carbon economy by 2050. 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.

It's highly likely that the consensus committee charged with developing 'standards' will be made up of members with a vested financial interest in the code. There's no guarantee whatsoever that local government will be represented on the committee.

There has been no assurance from ICC that the code will not be immediately rolled back and made less efficient—which we know some stakeholders want. Builders have made proposals in every recent code development cycle that would reduce the efficiency of the code. The governmental voting members have always soundly rejected those proposals, but this process would not contain those kinds of checks and balances.

Please continue the current developmental process where governmental members are afforded the right to vote on any changes.

Respectfully,  
The City of St. Charles, IL