

OFFICE OF CLIMATE CHANGE, SUSTAINABILITY AND RESILIENCY
CITY AND COUNTY OF HONOLULU

925 DILLINGHAM BOULEVARD, SUITE 257 • HONOLULU, HAWAII 96817
PHONE: (808) 768-2277 • EMAIL: resilientoahu@honolulu.gov • INTERNET: www.resilientoahu.org



KIRK CALDWELL
MAYOR

JOSHUA W. STANBRO
EXECUTIVE DIRECTOR &
CHIEF RESILIENCE OFFICER

August 11, 2020

2019 Group B Appeals Board Members
c/o Mr. Michael J. Pfeiffer, Senior Vice President of Technical Services
Mr. Dominic Sims, Chief Executive Officer
Mr. Greg Wheeler, CBO President
International Code Council
500 New Jersey Avenue NW, 6th Floor
Washington, DC 20001

Dear Members of the 2019 Group B Appeals Board, Mr. Wheeler, and Mr. Sims:

The City and County of Honolulu's Office of Climate Change, Sustainability and Resiliency ("Resilience Office") had the opportunity to participate in the 2021 International Energy Conservation Code (IECC) voting process recently. We were relieved to read in April that the challenges were not upheld by the Validation Committee and review of the ICC Board of Directors. We recently learned these same challenges have been resurfaced as appeals. I am writing to strongly encourage you to uphold the outcomes of this voting process.

We'd like to address three main areas of the appeals:

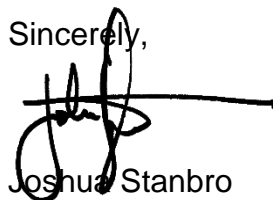
- 1) **The attempt to overturn the online vote:** Our voting representatives followed the rules laid out by the ICC in the voting process, and in doing so, it seems did overturn some proposals that were disapproved at the committee level and at the hearings in Las Vegas. Our membership is allowed 12 votes. This is more than the number of committee members (11) and at times more than the number of voters in the room in Las Vegas (between 5-64). We took into consideration the opinion of the committee, the written proposals and public comments, and the video testimony, and believed that for our jurisdiction, the proposal met our needs. Our needs may be different than those represented by the committee or the members in Las Vegas, but that does not make our needs less valid.
- 2) **The attempts to remove electrification measures from the code:** We heard at various points in the hearings testimony that the IECC may not be the right place for these measures, but following the rules that were put before us we chose, as many did, to disagree. We know that to meet the needs and climate goals of

Honolulu, electrification is a critical piece of energy planning and conservation. In fact, since the IECC vote, the Honolulu City Council unanimously passed an update to our local energy codes which includes minimum electric vehicle readiness standards, with adoption of Ordinance 20-10. Our actions regards the IECC were informed and deliberate. To help us move our energy codes forward, measures that help us plan for increased electrification must be included.

- 3) **The attacks on our credentials to be voters:** A lot of effort was made by our City staff to follow the ICC guidelines to become members, register governmental voting representatives, engage in understanding the proposals, and vote using the cdpAccess tool. While one of our staff was indeed able to travel and attend the ICC Annual Conference in Las Vegas in October 2019 and participate in the Group B Public Comment Hearings, given limited budgets for travel to participate in multiple iterations of the code development process, the open voting period was an excellent opportunity for many other of our staff to be engaged in this process. We believe it is of great benefit to have a larger percentage of eligible voting members participate in the code development process. Our staff works directly and regularly on code development, policy, and education for Honolulu. We believe we followed the rules to become members, and that our voters are informed and knowledgeable on the issues put in front of them and the needs of our municipality. The attack on our understanding of what we voted on without knowing our voters is unfounded.

In summary, the 2021 IECC are the results of the verified ICC Governmental Member participation, and the efforts by local and state jurisdictions involved to produce a better IECC. We greatly appreciate your efforts and those of your staff to maintain the integrity of this system. As such, I again urge you to uphold these voting results.

Sincerely,

A handwritten signature in black ink, appearing to read 'Joshua Stanbro', with a long horizontal line extending to the right.

Joshua Stanbro
Executive Director and
Chief Resilience Officer