



OFFICE OF THE COUNTY EXECUTIVE

Marc Elrich
County Executive

January 11, 2021

Dear International Code Council Board Members,

Montgomery County, Maryland, strongly supports the continued democratic process of the International Energy Conservation Code (IECC).

Enacting model energy codes is a critical policy strategy for local governments to not only ensure safe and energy-efficient new buildings but also reduce GHG pollution and meet climate goals. In December 2017, Montgomery County was the first county in the nation to declare a Climate Emergency and accelerated [our climate goals](#) to an 80% reduction in greenhouse gas (GHG) emissions by 2027 and zero emissions by 2035. With more than half of our community-wide GHG emissions generated by commercial and residential buildings, Montgomery County knows that a strong IECC is the key to unlocking emission reductions in our built environment.

Montgomery County values the ability to participate in the code-development process via online remote voting capabilities. This is an important process for stakeholders to help shape this consensus-driven IECC. The incredible work done by forward-thinking local governments helped advance the 2021 IECC as one of the most effective tools to curb GHG emissions in newly constructed buildings.

Changing the IECC from a code to a standard will essentially eliminate the opportunity for input from a broad range of stakeholders that include local governments and industry representatives. Prohibiting state and local governments from voting and participating in the code development process will disenfranchise a large constituency of stakeholders who make the ultimate decision to adopt and enforce building codes. By removing local government voices, the public interest purpose of the code development process will be substantially weakened.

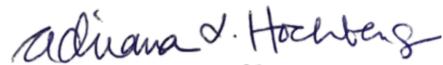
In this effort to change the IECC to a standard, many local jurisdictions may reject the IECC completely and leave them without a ready-to-adopt code that provides reliable, large-scale savings. The direct and indirect consequences on the efficiency of the built environment and the changing climate would be incalculable.

For these reasons, **Montgomery County supports maintaining the IECC as an open, transparent, and democratic code, and asks that the Board reject the proposal to replace**

the IECC with a standard. If any changes are being proposed to the code development process itself, the Board should provide all members the opportunity to review and vote on the proposed measure

Thank you for your time and opportunity to submit our comments, and for your ongoing commitment to an open and honest code development process.

Sincerely,

A handwritten signature in blue ink that reads "Adriana D. Hochberg". The signature is written in a cursive style with a blue ink color.

Adriana Hochberg
Assistant Chief Administrative Officer and
Climate Change Coordinator