

January 11, 2021

Dear

The Boston Society for Architecture (BSA/AIA), represents 92% of the registered architects in the Commonwealth, urges the International Code Council (ICC) not to change how the nation's model building energy code is developed—moving it from a large, open process to having it be developed by a committee without input from the local government building officials who administer it.

As representatives of 750 business in the Commonwealth and 4,500 architectural and allied professions in eastern Massachusetts, we observe that this proposed change is in direct response to robust advocacy for the energy efficiency increases adopted in the IECC 2021. The BSA has strongly advocated for such energy efficiency increases. We are concerned that changing the process of adoption will slow much needed progress in energy efficient building codes.

We offer the following points to further explain the BSA/AIA's opposition:

- If the process of change 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. Increasingly energy efficient buildings are vital to achieving a zero-carbon economy by 2050. Better performing new buildings are critical to this goal. Governmental officials understand this and for the most part, have used their votes in favor of efficiency, innovation, and a better future for all. The ICC Board must not silence their voices.
- We are unaware of any justification from the ICC Board about why such a dramatic change is necessary, and especially how it will result in a better outcome.
- Further, we are not in favor of, nor do we understand, the purpose of, disenfranchising the voices of thousands of ICC governmental members. This is especially concerning because the existing process has clearly been successful in developing a strong and relevant final code.

- As far as we know, there has been no assurance from ICC that the code will not be immediately rolled back and made less efficient — the outcome hoped for by some stakeholders. 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 the proposed process would no longer contain these kinds of checks and balances.
- In our view, it seems highly likely that the committee will be made up of members with a vested financial interest in the code. While the committee must be “balanced,” ICC appears to have a lot of discretion as to how that balance is defined. There is no guarantee whatsoever that efficiency advocates or pro-environmental interests will be represented on the committee. Whether or not progress will be made will depend highly on the makeup of the committee, as there is no stated commitment to improving the efficiency of the code.
- Finally, public participation helps to ensure that the code is not only efficient but also equitable. It is not clear to us how members of the general public will be able to comment on code decisions on a regular and timely basis.

We strongly urge that the ICC leave the code adoption process as it is. If the proposed change continues to be considered, BSA/AIA representatives would like to offer public testimony in opposition.

Very truly yours,



Gregory Minott, AIA

President
Boston Society for Architecture