



City of Austin

P.O. Box 1088
Austin, TX 78767

TO: International Code Council Board of Directors
DATE: January 11, 2021
RE: Adoption of a Standards Process for Development of the IECC

The City of Austin has adopted the IECC since its initiation in 2000. We have used the energy code as a baseline to reduce energy consumption significantly, even in the face of explosive economic and population growth over the past 20 years. Additionally, Austin has been proud to use its energy efficiency leadership in the ICC code adoption process with committee membership at code hearings and proposing new items to the energy code. The transparency of the code process with significant opportunities for direct participation cannot be understated. Lastly, Code hearings have additionally allowed our code official attendees to learn what works and what doesn't in other jurisdictions.

At this time we are not well enough informed about the proposed changes to tender a recommendation for or against based upon merits of the proposal. Following are unknowns The City would like to see answered:

- How will the proposed changes affect the makeup, balance and diversity of the decision-making bodies overseeing and developing the code to include the Committee, Project Teams and Officers?
- Does the ICC Board have specific goals in mind with regards to this makeup, balance and diversity?
- What specifically will be the impact to the current level of influence cities, municipalities and other governmental entities have in the IECC development and adoption process?
- How will the Committee ensure different climate zones are represented?

Due to these unknowns the City has a number of concerns, including:

- The potential for the lack of transparency for local stakeholders
- Ensuring sufficient and diverse government representation
- Ensuring the voice of communities served by government representation is not reduced
- That lack of extensive government participation might ultimately impact the long-term acceptance of the IECC
- Ensuring balanced representation in Committees, project teams and officers. The potential for undue influence by a group composed of enough representatives of Interest Classifications with alignment on a given special interest that isn't representative of the majority of IECC stakeholders
- Setting a precedence for limiting government participation in the code development process where government participation has been a strength of the International Code Council (ICC)

While the ICC Board may have a strong conviction that what is being proposed is best for the common good, there are still details that need to be worked out and communicated before asking for approval on a broad scale. The review period timing over the holidays and relatively light promotion of the proposal

made review and the opportunity for robust conversation about the proposal a hurried affair. We ask that the ICC Board answer the myriad questions that will surely come from this hearing and then prepare and deliver training on the Consensus Procedures to allow stakeholders to better understand what is being proposed before they are asked to render judgement.

The City of Austin has valued our participation in the IECC code cycles and look forward to participating in future code development cycles.

Respectfully,



Beth M. Culver, CBO, AIA
Building Official, Assistant Director
City of Austin

CC: Dominic Simms, ICC CEO
Melike Oncu, ICC General Counsel