



HOWARD COUNTY DEPARTMENT OF INSPECTIONS, LICENSES AND PERMITS

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Robert J. Frances, P.E., Director

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January 11, 2021

RE: Public Comment on IECC Proposed Standard Development Process

Dear ICC Board of Directors:

Good morning, my name is Donald Mock and I am the current Chief of Plan Review for Howard County, Maryland and a Licensed Professional Engineer within the State of Maryland. I have served on the following ICC committees in the past; SEHPCAC for 3 terms and the Commercial Energy Code hearing committee for 2 terms. I currently serve as a member of the Sustainability Membership Council and Codes and Standards Council.

I am providing the following written testimony about the proposed Standard Development process for the International Energy Conservation Code (IECC) and Chapter 11 of the International Residential Code (IRC). I have been involved with the development of the Energy Codes since 2012 and I am very concerned about moving the adoption of the Energy Codes to a Standard Development Process. I feel the membership will lose the ability to comment and provide input through the code hearing process that is currently used for most of the ICC codes. We, as Building Officials, need to be involved in the process because ultimately it is our responsibility to enforce the codes that are adopted. Building Officials and Inspectors look at all the proposed code changes to discuss what is being proposed and whether or not it's enforceable, as well as beneficial to the public. I see this being lost in a Standard Development process.

In the past there has been a lack of input into the energy code, from Building Officials, due to the fact that they may not have been knowledgeable in this area. That is currently changing, and we are seeing Departments hire more people with expertise in Energy Codes, this alone will provide more knowledge and more input from the Code Officials. It is very important to maintain input from the Code Officials with proposed code changes to the Energy Code from across the country. Energy is very dependent on the region and location and better input can be gained from all regions through the current code adoption process. Input, like this, cannot be obtained in a Standards Development Process as you will hear from a select group located in the northwest United States and is not knowledgeable in what is best down South.

If the board decides to move forward with moving the Energy Codes to a Standard Development Process, I hope this is not expanded to moving the other ICC Codes to this process. We definitely oppose moving any other ICC Codes to a Standard Development Process. Another way of addressing the issues we are currently seeing is to look at re-evaluating the current definition of a Governmental Voting Member to make sure the Governmental members voting are actual code officials. I hope you take this into consideration.

In conclusion, I am not in favor of changing the way the Energy Codes are currently adopted to the Standard Development Process. The adoption of these codes should be maintained under our current method of the code hearing process.

Sincerely,

Donald L. Mock, P.E.
Chief of Plan Review

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