

January 11, 2021

International Code Council Board of Directors
500 New Jersey Avenue, NW
6th Floor, Washington, DC 20001

Re: Opposition to proposed changes to energy code development process

Multnomah County strongly supports the 2021 International Energy Conservation Code (IECC), the most energy efficient building code in history. The 2021 IECC represents a significant improvement over the 2018 IECC and will play a critical role in meeting Multnomah County's and the State of Oregon's energy and climate goals. The County was proud to participate in the accessible and democratic process to make our voice heard during the development of the 2021 IECC. However, I am writing today to urge the International Code Council to abandon its effort to limit the participation of local governments in future code development processes. Active participation by a wide range of stakeholders, including local governments, is critical to the integrity of the IECC. The undemocratic proposal under consideration will undermine the credibility of the ICC and future of the IECC.

In Oregon, local governments are prohibited from adopting energy codes that differ from the state standard in place. The state standard is driven by the IECC. Therefore, advocacy during the IECC development process is critical for local governments in Oregon, including Multnomah County, to achieve their local energy efficiency goals. The current process already represents a significant investment of time and effort to effectively engage in the code development process. Multnomah County has in the past been able to justify that investment because of how critical the energy code is to achieving our adopted energy and climate goals, which in turn reflect the strong desire of our community to address climate change. However, Multnomah County is very concerned that the proposed changes will make continued participation in the process untenable, and that our voice and many others will not be heard.

We urge you to abandon the proposed code development process changes and continue to use the open and democratic approach that proved so successful in the 2021 IECC.

Respectfully,

Tim Lynch, Senior Policy Analyst
Multnomah County Office of Sustainability.