



December 22, 2020

Mr. Dominic Sims
Chief Executive Officer
International Code Council
500 New Jersey Avenue NW, 6th Floor
Washington, DC 20001

Dear Mr. Sims,

On behalf of the National League of Cities and The U.S. Conference of Mayors, together representing the nation's 19,000 cities, towns and villages and their chief elected official, we are writing to express concern over the International Code Council (ICC's) consideration of the National Association of Home Builders (NAHB) motion to eliminate the International Energy Conservation Code (IECC) from the Governmental Consensus Process that develops the family of International Codes (I-Codes) and create a new ICC standard for residential and commercial buildings.

Many of our members—local elected officials—administer and enforce the 15 I-Codes that the ICC publishes to improve the safety, fire protection, resilience and efficiency of America's residential, multifamily and commercial buildings. A large number of these cities are also engaged in the ICC's Governmental Consensus Process because the codes are a tool to achieve carbon emission reductions from buildings and their energy sources.


Local government officials (e.g., mayors, councilmembers, city managers and other local staff) view the 15 I-Codes, particularly the IECC, as critical to achieving both local and national clean energy goals. Beginning with the 2009 IECC, the ICC Governmental Members have supported measures that steadily boost the energy efficiency of what has become known as America's Model Energy Code.

The benefits of improving building efficiency extend beyond energy savings that quickly recoup incremental cost of efficiency measures and improve long-term building affordability for owners and tenants, to improved indoor air quality, low-income assistance, increased property values and power grid stability.

We are concerned about your consideration to remove the IECC from the Governmental Consensus Process that develops the family of I-Codes, and believe doing so would undermine the integrity of the process. Furthermore, disenfranchising our Governmental Members from voting on IECC improvements is contrary to the inclusive governance this space demands. We strongly urge you to leave the final determination of future IECC content in the hands of your Governmental Members so that local government officials can continue to pursue timely updates to America's Model Energy Code.

Thank you for considering the local government perspective in this important decision. If you have any questions, please reach out to: Carolyn Berndt (NLC) at berndt@nlc.org or Rich Anderson (USCM) at randerson@usmayors.org.

Sincerely,



Clarence E. Anthony
CEO and Executive Director
National League of Cities



Tom Cochran
CEO and Executive Director
The U.S. Conference of Mayors