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Name:	Karin Gredvig
Email:	kgredvig@mwalliance.org
Phone:	(626) 616-6061
Address:	20 N. Wacker Drive Suite 1301 Chicago, IL 60606
Indiana Code You Are Commenting On:	MEEA Comments on IECC and IRC
Comment or Proposal:	
File:	View File

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Formstack, 11671 Lantern Road, Suite 300, Fishers, IN 46038



20 N. Wacker Drive, Suite 1301
Chicago, Illinois 60606

312.587.8390 Main Line

312.587.8391 Fax

www.mwalliance.org

July 15, 2021

Indiana Fire Prevention and Building Safety Commission
Exploratory Committee for Code Updates
302 W. Washington Street, Room E208
Indianapolis, IN 46204

Re: Public Comments on the Commission's Code Update Priority

Dear Chairman Popich and Members of the Committee,

Thank you for opportunity to comment on Indiana's review of current statewide codes and recommending proposals for the next statewide codes. The Midwest Energy Efficiency Alliance (MEEA) is a member-based non-profit organization promoting energy efficiency to optimize energy generation, reduce consumption, create jobs and decrease carbon emissions in all Midwest communities. MEEA has previously worked in Indiana on energy codes and provided technical assistance to the Indiana Department of Homeland Security in previous energy code adoption cycles.

This letter is a supplement to our comments submitted at the June 10, 2021 meeting of the Exploratory Committee for Code Updates, where we expressed our support for adopting the energy conservation requirements found in the 2021 International Energy Conservation Code (IECC) for residential and commercial buildings. MEEA urges the Committee to prioritize the statewide energy code with the family of core codes¹ to ensure the people of Indiana receive the wide-ranging benefits of the new model building codes.

The Exploratory Committee has a unique opportunity to prioritize updated codes for all buildings for the state of Indiana. Updating all statewide building codes following the release of the updated national model codes sets consistent expectations that builders and code officials can rely on. The IECC is the most widely adopted model energy code for residential and commercial construction and has been adopted in nearly every state that has a statewide energy code. The IECC has improved in efficiency with every new edition, providing straightforward energy and cost savings for the building owners and occupants and is an important policy tool for state and local governments to reduce consumption and meet carbon reduction goals.

The energy code, like all model building codes, is a life-safety code reinforcing the health and integrity of homes and buildings.² Outdated or unenforced energy codes can lead to buildings with poor indoor air quality, dangerous mold growth and rotting structural members. Adequate indoor air quality, moisture management and building

¹ The June 10, 2021 meeting of the Exploratory Committee identified the family of core codes to include the International Building, Fire, Fuel Gas, Mechanical and Plumbing Codes.

² See Energy Codes are Life-Safety Codes: https://www.mwalliance.org/sites/default/files/meea-research/meea_codes_life_safety.pdf

resiliency are critical to ensuring occupants remain healthy and comfortable whether they are at their workplace or home. The Committee should prioritize the 2021 IECC because it integrates electrical, heating, cooling, ventilation and building envelope components, which work together to optimize the safety and energy costs for building occupants and communities.

While Indiana recently made an update to the energy provisions in the statewide residential code, 2018 IRC with amendments for residential buildings, it missed significant opportunities to improve energy efficiency, occupant comfort, and indoor air quality in residential buildings. Postponing the adoption of the residential energy code would result in these provisions to be out of sync with the other adopted building codes. Building codes are inextricably linked, with codes in the same model year often referencing key sections from one code to another. Failure to adopt the full suite of codes could cause confusion during implementation since older residential and commercial energy provisions are not designed to communicate with the 2021 codes.

Updating the Indiana residential and commercial Energy Codes to the 2021 would place Indiana at the forefront of build efficiency. As a result, the 2021 IECC will make buildings more resilient, reduce costs for owners and occupants, help promote local job creation, and improve the state's building infrastructure for generations to come. The adoption of the 2021 IECC also ensures that Indiana is supporting the installation of the latest technological advances and construction best practices in their buildings.

The adoption of the unamended 2021 IECC is a cost-effective way to improve building energy efficiency and reduce operating costs of buildings in Indiana. While there may be modest increases to the cost of construction associated with the improved provisions in the 2021 IECC, the numerous health, resilience, and economic benefits to occupants and the community are undeniable and ensure long-term affordability and livability to Indiana residents. Considering many new homes and buildings constructed today will be in active use for the next 50+ years, it is critical that these long-lasting measures be installed when it is most cost effective to do so – during initial construction. Delaying the adoption of potential efficiency improvements in the energy code will have long-lasting consequences. Prioritizing an update to the residential and commercial energy code assures those benefits are captured for current residents and future generations.

MEEA supports adopting new building energy codes for commercial and residential buildings in the state. Updating these codes would not add additional regulatory burden to construction professionals in the state, but instead modifies existing regulations in order to increase improvements in building energy efficiency. The adoption of new codes is necessary for Indiana keep up with changes in construction best practices throughout the region, reduce the operating costs of homes and buildings, and improve public health and wellness.



20 N. Wacker Drive, Suite 1301
Chicago, Illinois 60606

312.587.8390 [Main Line](tel:312.587.8390)

312.587.8391 [Fax](tel:312.587.8391)

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We urge the council to prioritize the adoption of the unamended 2021 IECC for residential and commercial buildings in Indiana. Doing so will reduce the energy use and cost for residents, create more comfortable and healthier indoor environments, and aid the economic recovery of the energy efficiency workforce. If you have any additional questions, please contact MEEA's Building Policy Manager, Nicole Westfall at nwestfall@mwalliance.org.

Thank you for your time and consideration.

Sincerely,

Stacey Paradis
Executive Director