



May 24, 2024

Dear Mayor Lucas and Members of the City Council:

**RE: Committee Substitute for Ordinance No. 240434**

Model energy codes are developed nationally by building professionals through a collaborative process addressing the intersection between costs and benefits. Model codes consider innovations and best practices in construction and building components. Targets in the Climate Protection and Resiliency Plan address the local emission reductions across all sources. Planning targets are not substitutes for best practices. Buildings have long lifespans and are key to the viability of any city. It is in Kansas City's best interest to preserve the option to evaluate model building and energy codes on merit.

The timing and application of code adoptions should be based on the beneficial options and innovations the codes offer rather than any arbitrary schedule or prescriptive emissions reduction. Prior to adoption of the 2021 International Energy Conservation Code, Kansas City was operating under the 2012 Energy Code. City staff elected to defer consideration of the 2018 Model Energy Code, because the 2021 Model Energy Code achieved significantly more efficiency.

The local building industry was consulted and given opportunities to participate with other stakeholders in the process leading to adoption of the 2021 Code. Any proposed revisions to the 2021 Energy Code should be evaluated in consultation with the other stakeholders including consumer and environmental advocates.

The 2021 Energy Code already includes a performance-based compliance path. Free training on how to comply with this alternative has been and continues to be available to builders. The EMC defers to the AIA Green Building Council and the Metropolitan Energy Center regarding the equivalency of the proposed alternative energy rating index score and other changes proposed by Committee Substitute for Ordinance No. 240434.

Respectfully submitted,

Handwritten signature of Carol T. Adams in blue ink.

Carol T. Adams, Chair, EMC

cc: Brian Platt, City Manager