

June 13, 2024

City Councilmembers
City of Kansas City, Missouri
Via email: ccl@kcmo.org

RE: Opposition to Ordinance 240434

Dear City Councilmembers:

As the professional organization that represents the architecture and design community, AIA Kansas City formally opposes the proposed ordinance 240434. We believe the adoption of the 2021 IECC without amendments in 2022 was not only an important step towards meeting Kansas City's Climate Action Goals, but also moves the needle on energy consumption and carbon reduction in Kansas City. All these advantages benefit our community as a whole. We oppose the ordinance as written for the following reasons:

- The basis for the submission of the ordinance seems to be the frustration in the permitting process and challenges currently observed in Kansas City. We do not believe adding a fourth path of compliance simplifies the permitting process at all and, in fact, adds an additional layer of complexity and confusion. Furthermore, the city has been making progress on improving this process. For example, the Informational Bulletin IB171 RE issued in April provides better guidance than what existed previously for architects and home builders. AIA Kansas City looks forward to the update for IB171 CE as we believe this will provide an even more streamlined process.
- A path of compliance tied to a metric already exists. The ERI compliance path R406.5 stipulates that an ERI of 54 in Climate Zone 4 meets compliance. This equates to approximately a 51 HERS Index – much lower than the 68 HERS being proposed in this ordinance
- Version 2 of the new ordinance allows for the testing of one model home to apply to all future homes in the Master Building Plan. This would eliminate any checks and balances on the quality of construction or adherence to requirements.
- The Home Builders Association of Greater Kansas City seemed to lead the development of this ordinance without input, collaboration, or conversations with others in the construction community, and the metrics they chose to highlight are questionable. Without unbiased information, we feel that modifying the current IECC compliance paths is one-sided and short-sighted.

AIA Kansas City represents nearly 1,200 architects in this region that work at all scales of the built environment, from small tenant improvements, to single family homes, to large mixed-use developments. We are directly impacted each time a new building code is adopted and understand there are learning curves with each cycle. Each time, we have also seen the building community adapt and are able to design and build safer, more energy-efficient, and resilient buildings that our community lives, works and plays in.

We are committed to the health, safety and welfare of our community and because of this, hope that you reject this ordinance.

Thank you,

A handwritten signature in black ink, appearing to read 'D. Davison', with a stylized, flowing script.

Dominique Davison, AIA

Board President