



May 6, 2024

Dear City Council Members,

I am writing to express our support for the 2021 International Energy Conservation Code (IECC) in Kansas City, Missouri, and to address concerns raised by the proposal put forth by the Home Builders Association. As partner of Aspen Homebuilders LLC, we believe in building better, more comfortable homes and recognize the importance of energy efficiency in achieving this goal.

The 2021 IECC includes important updates and enhancements that will help reduce energy consumption, lower utility costs, and decrease carbon emissions. It not only creates opportunities for growth and innovation, but also ensures that homes are built to a higher quality standard, leading to increased energy efficiency, and promoting sustainability in Kansas City. By requiring new buildings to meet these more stringent standards, we are taking a crucial step towards creating a more environmentally friendly and resilient community.

We are concerned about the proposal to reduce the energy code standards, as this would result in a step backward from the progress made with the 2021 IECC. The proposal put forth by the Home Builders Association will reduce the energy code to a worse standard than what was in place before the implementation of the new energy code.

The proposal suggests creating just one energy model for each master plan and conducting inspections solely on the first home. The HERS path is designed as a flexible alternative to the prescriptive code, allowing for efficiency verification through extensive testing and inspections. However, if this proposal is accepted, it would represent a regression from the original KCMO code since builders opting for the HERS path were previously required to undergo testing and inspections with the HERS rater for each home utilizing this path. We advocate for the preservation of the 2021 Energy code in its original form. This code already includes an ERI path with a score of 51 and lower, while the path proposed by the HBA significantly deviates from the standards set by the 2021 IECC.

My understanding from the HBA is that the biggest concern doesn't lie within the energy codes, it's about the timing of permits. Many builders have been working hard to comply with the codes and fully understand what is needed for permitting to expedite this process through educational classes, meetings, and events. We have personally attended multiple classes and worked directly with HERS Raters to ensure that we are going through the



process as smoothly as possible. With more and more people taking the initiative to fully understand what it takes to comply with this code, the permits will start to pick back up. We have several homes submitted for permitting and know our HERS Rater has worked on over 100 homes for 2021 IECC. We, along with many other builders, have adapted to this code and do not see a problem with the code itself.

The builders, including ourselves, who have adapted to this code have put a lot of initial investment into building better homes and feel that we are going to get the short end of the stick if this proposal is passed. All the builders who have put the time, money, and effort into building these better homes will have a market disadvantage as opposed to those who pulled permits early or have been waiting for the code to be reduced. There have been countless homes that have gone through the process of getting up to 2021 IECC that will have a harder time being sold versus the houses that are cheaper and not up to 2021 IECC. While the initial permitting is where people seem to struggle, once people are fully knowledgeable about the process more and more permits will be going through.

Some builders have been resistant to conforming to the code and have delayed making necessary upgrades to their construction practices in hopes of the code being reversed. However, we believe that it is time for a better code and better homes to ensure the well-being of our community and the sustainability of our city for future generations.

The issue may not lie within the code itself, but rather with the education and understanding of what the city requires in building plans. It is important to give adequate time for the implementation and impact of the current code to be fully realized before considering any amendments or reductions.

We encourage the city council to see through the implementation of the 2021 IECC and to prioritize energy efficiency and sustainability of new construction in Kansas City. I want to commend the city council for their leadership and commitment to promoting sustainability and energy efficiency in our city thus far and hope to see it continue moving forward. Thank you for helping Kansas City take this important step towards a more sustainable future for all residents.

Sincerely,

Tony Libra
Partner
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