
11 June 2024

To Whom It May Concern:

Climate Action KC (CAKC) is dedicated to supporting aligned climate and equity policies, actions, and incentives throughout the Kansas City metropolitan region. Kansas City's first regional [Climate Action Plan](#) is dedicated to the memory of Dennis Murphey, former Chief Environmental Officer for Kansas City Missouri. As KCMO has recently updated and passed an update to the 2005 Climate plan Dennis championed, leaders in our broad network have taken note that many of the surrounding municipalities and counties in our region are watching carefully what Kansas City does next in setting the pace and defining the goals to which others will aspire. At this time 7 municipalities and 2 counties are reviewing IECC 2021 and 2024 for adoption in the next code cycle, following KCMO's leadership.

The update of Kansas City's building code to include the most current energy code with strengthening amendments (EV ready and PV ready) as well as the optional Zero Code Appendix has successfully set an example for others to follow, and demonstrates a clear commitment to public health, social equity, and mitigating climate change. Climate Action KC is in full support of this policy adoption. Rolling this well considered, vetted, and publicly discussed energy code update is short-sighted and damaging to Kansas City's reputation and future. We respectfully urge you to **reject Ordinance 240434**, which if passed will raise costs for both current and future residents in Kansas City, and undermine opportunities for homebuyers – especially those with lower incomes – to access affordable housing finance. It is a bad policy that reduces performance and resilience, breaks the publicly developed commitments of KCMO and the greater KC Region, and harms the most vulnerable across the region.

Performance

The proposed ordinance includes substantial roll-backs to the energy code to performance that yields a weaker performance than the previous energy code, includes provisions that lock in poor performance for the next 6 years, and even cedes decision-making power from the City to special interest groups who have demonstrated a desire to reduce code requirements as far as legally possible. The proposed alternative compliance path essentially duplicates the EIR approach already allowed in the code, but with a substantially reduced performance value, and fewer testing requirements.

Resilience

As we consider the impact of heat and cold waves on our communities across the Kansas City Region, energy codes and code enforcement is the primary tool to improve resiliency of our community homes and businesses to remain in operation and to shelter in place. The duration and intensity of these conditions are measurably growing, impacting more residents every year. **Homes built to meet the IECC 2021 code requirements will double the time residents are able to stay safe and comfortable in their homes** – especially important for homes with children and elderly occupants.

Kansas City Missouri Climate Protection & Resiliency Plan Alignment

Adopted in September 2022 the KCMO Climate Protection & Resiliency Plan, distilled thousands of comments and dozens of public meetings with KCMO residents, businesses, and industries and incorporated this overwhelming feedback from the public. Strategy B-3 of the plan states that the City will “regularly review and update building health and performance standards. Review building code every three years and update new construction buildings codes based on outcomes of the review, with goal of adopting, at minimum, the most recent IECC building performance standards”. It also recommends that new homes achieve a HERS score of 50 as a specific strategy. The adopted IECC code requires an EIS

(similar to HERS) rating of 51. The proposed amendment would weaken this by 17 points down to a HERS score of 68.

Regional Climate Action Plan Alignment

The Regional Green House Gas (GHG) Inventory and Climate Risk Assessment created as the foundation of the Regional Climate Action Plan shows that over 60% of our regional emissions come from commercial and residential buildings, split almost evenly. These emissions are only growing as more buildings are constructed and renovated each year, further compounding the extreme heat and stormwater climate risk impacts burdening communities with high socioeconomic stress indexes – many of which are located within Kansas City Missouri. Building codes are the primary way to influence this impact, and both residential and commercial codes are critical.

The adopted IECC 2021 with strengthening amendments in Kansas City Missouri aligns with the Regional Action Plan both in spirit and in specifics:

- T-LU 2.1: Expand electric vehicle charging infrastructure throughout the region
- EG-2.2: Expand corporate, industrial, and institutional solar energy generation
- EG-2.3: Increase incentives and eliminate barriers for residential solar energy production
- EG-3.3: Increase power outage resilience
- BE-1.3: Implement energy efficiency and renewable energy strategies at schools, universities, nonprofit organizations, and libraries
- BE-2.2: Maximize savings through energy efficiency and healthy home programs
- BE-2.3: Embed energy efficiency and durability in affordable housing efforts
- BE-2.4: Adopt building health and performance standards and local government enforcement strategies, including IECC and National Healthy Housing Standards.

We appreciate your consideration of these priorities and look forward to working together as a region toward these shared goals.

With Gratitude,



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Hillary Parker Thomas



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Jeremy Knoll