

February 14, 2020

Dominic Sims, CEO
International Code Council
500 New Jersey Avenue, NW
6th Floor
Washington, DC 20001

Dear Mr. Sims:

As discussed during our January 21 meeting in Las Vegas, NAHB has serious concerns related to the ICC 2019 Group B energy results. It appears that a combination of improperly validated voters, proposals not meeting the intent of the International Energy Conservation Code (IECC) and a newly-uncovered flaw in the voting process resulted in voting irregularities and proposals being approved that will greatly reduce the functionality of the 2021 IECC and significantly impact affordability. We are equally concerned about how these flaws might impact the integrity of the ICC code development process and the credibility of the codes, themselves.

NAHB has been supportive of the Online Governmental Consensus Vote (OGCV) since its inception. However, NAHB based this support on the assumption that validated voters would be knowledgeable of the building codes and have a practical understanding on the impact of code proposals on construction practices. Building Code officials are the most reasonable arbiters in developing a building code. For the most part, they do not have a “dog in the fight” and they know what is reasonable and what is enforceable. Once this dynamic changes, the codes become a political tool rather than a credible set of minimum building requirements.

NAHB’s concerns are presented in greater detail below, along with suggested remedies.

Validated Voter Discrepancies

NAHB believes the Group B OGCV had an influx of voters who were incorrectly validated for the 2019 code cycle.

For the past few code development cycles, ICC has maintained a list of the Governmental Member Voting Representatives (GMVRs) that have met the validation deadline and made that list available to ICC members. Historically, this list has appeared to be up-to-date and making the ICC Member Directory available has been viewed as an important step toward improving the transparency of an on-line process that is inherently opaque.

In 2019, only minor updates occurred to the ICC Member Directory after the March 29th Governmental Member application deadline and the GMVR application deadline of September 23rd. At some point between late October and December 19, 2019, however, there was a major update that added roughly 209 newly validated Governmental Members to the roster, totaling about 1,345 new Voting Representatives.

NAHB is concerned about the eligibility of many of the Governmental Members, especially those who were posted after the commencement of the Group B OGCV. We have attached a list (Attachment A) of Governmental Members and/or GMVRs that we believe should be reevaluated because we do not believe they meet the ICC Bylaws' definition.

The ICC Bylaws state, “[A] Governmental Member [Voting Representative] ...shall be an employee or a public official **actively engaged** either full or part time, in the **administration, formulation, implementation or enforcement** of laws, ordinances, rules or regulations relating to the public health, safety and welfare.”

Proposed Remedy: At a minimum, the qualifications of the GMVRs listed on Attachment A who voted in the Group B OGCV need to be reassessed to determine their eligibility. Once that is completed, the OGCV results should be retallied, excluding and the votes of any GMVRs who do not meet the current bylaws. In the future, ICC must implement policies and procedures to ensure GMVRs are more closely vetted during the application process to ensure they meet the proper qualifications, including being directly affiliated with their associated Governmental Member and actively engaged as defined by the bylaws. NAHB urges ICC to revise its bylaws to ensure participation is appropriately limited to those who are directly knowledgeable of the I-Codes. NAHB also requests that ICC maintain an up-to-date list of the Governmental Members and GMVRs on the ICCSAFE.org website.

CP #28 Code Development Flaw

NAHB does not believe that allowing a 2/3 OGCV vote to overturn proposals that were disapproved at the two previous hearing was ever the intent of the ICC process.

Since the inception of the OGCV, beginning with the 2014 Group C code cycle, there had never been a single instance in any code group where the code development committee and the assembly disapproved a code change proposal and that proposal was revived through a 2/3 vote in the OGCV. However, in the 2019 Group B cycle, twenty proposals that were disapproved at both hearings received a 2/3 vote in the OGCV and were ultimately approved. Not coincidentally, recommendations to approve all of these proposals were contained in a voting guide distributed by an energy advocacy coalition. This exploited flaw, if not corrected, will have a significant impact on future code development and the resultant codes. For the 2019 Group B IECC it will significantly impact affordability, as NAHB. NAHB estimates that the cost impact for these 20 proposals can be in excess of \$10,000 per house in some climate zones.

For proposals that are disapproved at the Committee Action Hearing and do not get enough votes to overturn them at the Public Comment Hearing, ICC Council Policy #28-05 – Code Development (CP #28) dictates that the proposal is disapproved, and no further discussion takes place. Further, this policy does not allow proposed modifications to proposals that have been defeated twice to even be discussed because the assumption is that the proposal is no longer viable. However, the current ICC process still allows these proposals to advance to OGCV ballot and be approved with a 2/3 vote.

The Code Change Proposals in Group B that were disapproved at the Committee Action Hearings, disapproved at the Public Comment Hearing, yet received a 2/3 or greater OGCV resulting in an “As Submitted” outcome include: RE21, RE29, RE32, RE33, RE36, RE37, RE126, RE145, RE147, RE151, RE182, RE184, RE192, RE204, RE209, CE12, CE49, CE56, CE217 Part II, and CE262.

When developing cdpACCESS and the OGCV, the ICC Board saw the potential for voting irregularities within the OGCV. They had the foresight to include Section 10.2, which provides the ICC Board the latitude to address these types of problems. It reads,

“10.2 Voting Irregularities: Where voting irregularities or other concerns with the Online Governmental Consensus Voting process, which are material to the outcome or the disposition of a code change proposal(s) are identified by the validation committee, such irregularities or concerns shall be immediately brought to the attention of the ICC Board. The ICC Board shall take whatever action necessary to ensure a fair and impartial Final Action vote on all code change proposals, including but not limited to:

1. Set aside the results of the Online Governmental Consensus Vote and have the vote taken again.
2. Set aside the results of the Online Governmental Consensus Vote and declare the Final Action on all code change proposals to be in accordance with the results of the Public Comment Hearing.
3. Other actions as determined by the ICC Board.”

Proposed Remedy: NAHB recommends that the ICC Board set aside the OGCV results for all 20 proposals that were defeated at both the Committee Action and Public Comment Hearings. ICC is further urged to Revise CP #28 Section 7.6 to clarify that the Public Comment Hearing results are considered the Final Action for proposals that were disapproved at both the Committee Action Hearings and the Public Comment Hearings.

Proposals Inconsistent with Code Intent

Two of the proposals, in addition to being approved by overturning the Public Comment and Committee Action Hearings, were also, in our opinion, clearly outside the intent of the IECC (section R101.3 and C101.3). Proposal RE147 and CE217 Part I and Part II are completely beyond the scope of the IECC. These proposals require the addition of electric vehicle charging outlets and the installation of electric outlets where gas appliances are installed that can be used for future electric appliance replacement. Neither proposal increases energy efficiency.

R101.3 Intent. This code shall regulate the design and construction of buildings for the effective use and conservation of energy over the useful life of each building. This code is intended to provide flexibility to permit the use of innovative approaches and techniques to achieve this objective.

Proposed Remedy: The ICC Board should reject RE147 and CE217 Part I and Part II as not meeting the intent of the IECC and suggest that the proponents resubmit these proposals during the next cycle as part of NFPA 70 or the IgCC.


As a strategic partner and leading participant in crafting the I-Codes, NAHB has a long-term interest in retaining the rigor, credibility and legitimacy of the process followed to create the I-codes, as well as the codes themselves. Unfortunately, the 2019 Group B OGCV has called the integrity of the ICC code

development process into question. If the efforts taken to influence and direct the outcome of the Group B OGCV are left unchecked, the future code development cycles will become a free-for-all. This will undermine the process and ultimately the final product. NAHB urges ICC to promptly resolve the concerns raised in this letter so that the I-Codes can continue to be the preeminent resource they are today.

I and my colleagues stand ready to work with you to remedy this situation.

I look forward to hearing from you soon.

Sincerely,



Gerald M. Howard
Chief Executive Officer
National Association of Home Builders

CC: Greg Wheeler, President ICC
Kris Bridges, ICC Liaison to NAHB

Attachment 'A'
ICC Governmental Members

February 14, 2020

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
AK	Alaska State Div of Fire Life Safety	Anchorage, AK	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
AK	Alaska Housing Finance Corp	Anchorage, AK	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
AL	Alabama Dept of Economic & Cmnty Affairs	Montgomery, AL	<ul style="list-style-type: none"> • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws. • Not clear that governmental member applied by March 2019 deadline.
AL	City of Oneonta	Oneonta, AL	Not clear that governmental member applied by March 2019 deadline.
AL	City of Odenville	Odenville, AL	Not clear that governmental member applied by March 2019 deadline.
AR	<i>none</i>	<i>none</i>	<i>none</i>
AZ	City of Tucson Plan & Dev	Tucson, AZ	Not clear that governmental member applied by March 2019 deadline.
AZ	City of Phoenix	Phoenix, AZ	Not clear that governmental member applied by March 2019 deadline.
AZ	City of Phoenix Dept of Sustainability	Phoenix, AZ	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
AZ	City of Bullhead City	Bullhead City, AZ	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
AZ	Arizona Dept of Forestry & Fire Management	Phoenix, AZ	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
AZ	University of Arizona	Tucson, AZ	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
AZ	Salt River Project	Phoenix, AZ	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CA	City of Agoura Hills	Agoura Hills, CA	Not clear that governmental member applied by March 2019 deadline.
CA	City of Beverly Hills	Beverly Hills, CA	Not clear that governmental member applied by March 2019 deadline.
CA	City of Chino Hills	Chino Hills, CA	Not clear that governmental member applied by March 2019 deadline.
CA	City of Hemet	Hemet, CA	Not clear that governmental member applied by March 2019 deadline.
CA	UCLA Capital Programs	Los Angeles, CA	Not clear that governmental member applied by March 2019 deadline.
CA	Southern Marin Fire Protection District	Mill Valley, CA	Not clear that governmental member applied by March 2019 deadline.
CA	City of Palm Springs	Palm Springs, CA	Not clear that governmental member applied by March 2019 deadline.
CA	City of Redwood City	Redwood City, CA	Not clear that governmental member applied by March 2019 deadline.
CA	City of Richmond	Richmond, CA	Not clear that governmental member applied by March 2019 deadline.
CA	Pechanga Indian Resvtn Fire Dept	Temecula, CA	Not clear that governmental member applied by March 2019 deadline.
CA	Town of Tiburon	Tiburon, CA	Not clear that governmental member applied by March 2019 deadline.
CA	City of Woodland	Woodland, CA	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
CA	UCLA Capital Programs	Los Angeles, CA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CA	California Energy Commission	Sacramento, CA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CA	California Dept of Forestry & Fire Prot	Sacramento, CA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Boulder Climate & Sustainability Division	Boulder, CO	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Boulder County EnergySmart	Boulder, CO	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Adams County	Brighton, CO	Not clear that governmental member applied by March 2019 deadline.
CO	Town of Carbondale	Carbondale, CO	Not clear that governmental member applied by March 2019 deadline.
CO	Douglas County	Castle Rock, CO	Not clear that governmental member applied by March 2019 deadline.
CO	Colorado Department of Natural Resources	Denver, CO	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
CO	Denver Department of Environmental Health	Denver, CO	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Denver Department of General Services	Denver, CO	Not clear that governmental member applied by March 2019 deadline.
CO	Town of Erie	Erie, CO	Not clear that governmental member applied by March 2019 deadline.
CO	City of Fort Collins	Fort Collins, CO	Not clear that governmental member applied by March 2019 deadline.
CO	City of Fort Collins Climate Action Plan	Fort Collins, CO	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Mountain View Fire Prot Dist	Longmont, CO	Not clear that governmental member applied by March 2019 deadline.
CO	Town of Winter Park	Winter Park, CO	Not clear that governmental member applied by March 2019 deadline.
CO	Aspen Environmental Health & Sustainability	Aspen, CO	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	City of Fort Collins Utilities Admin	Fort Collins, CO	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Colorado Dept of Public Health & Env	Denver, CO	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Colorado State Energy Office	Denver, CO	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
CO	Denver Department of General Services	Denver, CO	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CO	Lakewood Sustainability Division	Lakewood, CO	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
CT	Town of Voluntown	Voluntown, CT	Not clear that governmental member applied by March 2019 deadline.
CT	Town of Enfield	Enfield, CT	Not clear that governmental member applied by March 2019 deadline.
DE	<i>none</i>	<i>none</i>	
FL	City of Miami Beach Comm Development	Miami Beach, FL	Not clear that governmental member applied by March 2019 deadline.
FL	City of Miramar Community & Econ Devel	Miramar, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	Sarasota City Manager Office	Sarasota, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws. • Job title does not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	Palm Beach School District	Palm Beach, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
FL	Palm Beach County Office of Resilience	Palm Beach, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	City of Miami Beach Bldg Dept	Miami Beach, FL	Not clear that governmental member applied by March 2019 deadline.
FL	Leon County	Tallahassee, FL	Not clear that governmental member applied by March 2019 deadline.
FL	City of Coral Springs	Coral Springs, FL	Not clear that governmental member applied by March 2019 deadline.
FL	City of Sarasota	Sarasota, FL	Not clear that governmental member applied by March 2019 deadline.
FL	City of Tallahassee	Tallahassee, FL	Not clear that governmental member applied by March 2019 deadline.
FL	City of Miami Beach	Miami Beach, FL	Not clear that governmental member applied by March 2019 deadline.
FL	Miami Beach Planning Dept	Miami Beach, FL	Not clear that governmental member applied by March 2019 deadline.
FL	City of Miami Beach Code Compliance	Miami Beach, FL	Not clear that governmental member applied by March 2019 deadline.
FL	Miami Beach Environment & Sustainability Dept	Miami Beach, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	City of Miami Beach Comm Development	Miami Beach, FL	Not clear that governmental member applied by March 2019 deadline.
FL	City of Miramar Community & Econ Devel	Miramar, FL	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
FL	Palm Beach School District	Palm Beach, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	Palm Beach County Office of Resilience	Palm Beach, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	Miami Beach Environment & Sustainability Dept	Miami Beach, FL	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	City of Clearwater Gas Dept	Clearwater, FL	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	Florida Dept of Energy	Tallahassee, FL	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
FL	Broward County Env Planning & Cmty Resilience	Fort Lauderdale, FL	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
GA	Forsyth County	Cumming, GA	Not clear that governmental member applied by March 2019 deadline.
GA	Fayette County Permit Dept	Fayetteville, GA	Not clear that governmental member applied by March 2019 deadline.
GA	Habersham County Bldg Dept	Clarksville, GA	Not clear that governmental member applied by March 2019 deadline.
HI	County Energy Management Advisory Committee	Kailua Kona, HI	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
HI	Honolulu Climate Change, Sustainability & Resiliency	Honolulu, HI	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
HI	Honolulu Board of Water Supply	Honolulu, HI	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
IA	City of Grinnell	Grinnell, IA	Not clear that governmental member applied by March 2019 deadline.
ID	Idaho Dept of Correction Capital Construction	Boise, ID	Not clear that governmental member applied by March 2019 deadline.
IL	City of Oak Forest	Oak Forest, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Chicago Ridge	Chicago Ridge, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Addison	Addison, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Hazel Crest	Hazel Crest, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Vernon Hills	Vernon Hills, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Schaumburg	Schaumburg, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Flossmoor	Flossmoor, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Wilmette	Wilmette, IL	Not clear that governmental member applied by March 2019 deadline.
IL	City of Park Ridge	Park Ridge, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Northbrook	Northbrook, IL	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
IL	Village of Northfield	Northfield, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Lake Bluff	Lake Bluff, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Palatine	Palatine, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Elk Grove Village	Elk Grove Village	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Barrington	Barrington, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Glenview	Glenview, IL	Not clear that governmental member applied by March 2019 deadline.
IL	City of Springfield	Springfield, IL	Not clear that governmental member applied by March 2019 deadline.
IL	Village of Lansing	Lansing, IL	Not clear that governmental member applied by March 2019 deadline.
IN	University of Southern Indiana	Evansville, IN	Job title does not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
KS	City of Wellsville	Wellsville, KS	Not clear that governmental member applied by March 2019 deadline.
KY	<i>none</i>	<i>none</i>	
LA	South Central Planning & Dev Commission	Gray, LA	Not clear that governmental member applied by March 2019 deadline.
LA	St John the Baptist Parish	La Place, LA	Not clear that governmental member applied by March 2019 deadline.
MA	Andover Green Advisory Board	Andover, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Devens Enterprise Commission	Devens, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
MA	City of Edina	Edina, MA	Not clear that governmental member applied by March 2019 deadline.
MA	City of Quincy Planning Department	Quincy, Ma	Not clear that governmental member applied by March 2019 deadline.
MA	City of North Adams	North Adams, MA	Not clear that governmental member applied by March 2019 deadline.
MA	City of Chicopee Bldg Dept	Chicopee, MA	Not clear that governmental member applied by March 2019 deadline.
MA	City of Cambridge City Council	Cambridge, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Town of Boxford	Boxford, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Worcester Energy and Asset Management	Worcester, MA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Town of Gill	Gill, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Worcester Economic Development	Worcester, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Sommerville Community Development	Sommerville, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Town of Winchester	Winchester, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Somerville Fire Department	Sommerville, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Town of Stoneham	Stoneham, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Northampton City Council	Northampton, MA	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
MA	Town of Arlington Energy Office	Arlington, MA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Massachusetts Clean Energy Center	Boston, MA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Town of Great Barrington	Barrington, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Northampton Department of Health	Northampton, MA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	City of Newton Public Buildings Dept	Newton, MA	Not clear that governmental member applied by March 2019 deadline.
MA	City of Somerville City Council	Somerville, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Town of Conway	Conway, MA	Not clear that governmental member applied by March 2019 deadline.
MA	City of Newton Public Buildings Dept	Newton, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Wakefield Environmental Sustainability	Wakefield, MA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Cambridge Community Development Dept	Cambridge, MA	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
MA	Town of Ashland Sustainability Committee	Ashland, MA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Somerville Planning & Zoning	Somerville, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Town of Concord	Concord, MA	Not clear that governmental member applied by March 2019 deadline.
MA	City of Newton Inspection Services	Newton, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Boston Public Facilities Dept	Boston, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Melrose Office of Planning & Cmty Development	Melrose, MA	Not clear that governmental member applied by March 2019 deadline.
MA	Provincetown Dept Health & Environment	Provincetown, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Massachusetts Energy Resources Dept	Boston, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	City of Medford Energy & Environment	Medford, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Boston Water and Sewer Commission	Boston, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Massachusetts Exec Office of Energy & Envir Affairs	Boston, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Newton Designer Selection Committee & Sustainability	Newton, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
MA	Northampton Planning and Sustainability	Northampton, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Town of Natick Public Works, Facilities	Natwick, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Boston Climate & Environmental Department	Boston, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Lincoln Green Energy Committee	Lincoln, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Westborough Sustainable Dept	Westborough, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Newton Citizen Commission on Energy	Newton, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	Warwick Buildings & Energy Committee	Warwick, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MA	City of Somerville Sustainability Dept	Somerville, MA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MD	Calvert County	Prince Frederick, MD	Not clear that governmental member applied by March 2019 deadline.
MD	Montgomery County Dept Environmental Protection	Rockville, MD	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
MD	University of Maryland Env Safety	College Park, MD	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MD	Washington Suburban Sanitary Commission	Laurel, MD	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
ME	<i>none</i>	<i>none</i>	
MI	Michigan Department of Natural Resources	Michigan	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MI	Michigan State Energy Office	Lansing, MI	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MN	City of Maple Grove	Maple Grove, MN	Not clear that governmental member applied by March 2019 deadline.
MN	City of Rochester Bldg Safety	Rochester, MN	Not clear that governmental member applied by March 2019 deadline.
MN	Minneapolis Health Department	Minneapolis, MN	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MN	City of Roseville	Roseville, MN	Not clear that governmental member applied by March 2019 deadline.
MN	City of Saint Paul Plan & Economic Dev	Saint Paul, MN	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
MN	City of Saint Louis Park	Saint Louis Park, MN	Not clear that governmental member applied by March 2019 deadline.
MN	City of Minneapolis Sustainability Program	Minneapolis, MN	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MN	State of Minnesota Natural Resources Forestry Div	Grand Rapids, MN	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MO	Monarch Fire Protection Dist	Chesterfield, MO	Not clear that governmental member applied by March 2019 deadline.
MS	Corinth Gas & Water Department	Corinth, MS	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
MT	<i>none</i>	<i>none</i>	
NC	City of Boiling Springs Lakes	Boiling Spring Lakes, NC	Not clear that governmental member applied by March 2019 deadline.
ND	<i>none</i>	<i>none</i>	

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
NE	State of Nebraska Energy Office	Lincoln, NE	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
NE	City of McCook	McCook, NE	Not clear that governmental member applied by March 2019 deadline.
NE	City of Norfolk	Norfolk, NE	Not clear that governmental member applied by March 2019 deadline.
NE	City of La Vista	La Vista, NE	Not clear that governmental member applied by March 2019 deadline.
NE	Metropolitan Utilities District	Omaha, NE	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
NH	City of Nashua	Nashua, NH	Not clear that governmental member applied by March 2019 deadline.
NJ	Clinton Fire Prevention Dept	Clinton, NJ	Not clear that governmental member applied by March 2019 deadline.
NJ	Dover Town Fire Dept	Dover, NJ	Not clear that governmental member applied by March 2019 deadline.
NJ	Borough of Hightstown	Hightstown, NJ	Not clear that governmental member applied by March 2019 deadline.
NJ	Delran Township Fire Dept	Riverside, NJ	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
NJ	Cranford Township Fire Dept	Cranford, NJ	Not clear that governmental member applied by March 2019 deadline.
NJ	Township of Franklin	Somerset, NJ	Not clear that governmental member applied by March 2019 deadline.
NM	City of Santa Fe Bldg Permit Division		Not clear that governmental member applied by March 2019 deadline.
NV	Nevada State Office of Energy	Carson City, NV	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
NY	Dormitory Authority State of NY		Not clear that governmental member applied by March 2019 deadline.
NY	State University Const Fund		Not clear that governmental member applied by March 2019 deadline.
NY	NYS Energy Research-Devel Authority		<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
NY	Village of Lawrence		Not clear that governmental member applied by March 2019 deadline.
NY	Town of Camillus		Not clear that governmental member applied by March 2019 deadline.
NY	Town of Guilderland		Not clear that governmental member applied by March 2019 deadline.
NY	Village of East Hampton		Not clear that governmental member applied by March 2019 deadline.
NY	Village of Bronxville		Not clear that governmental member applied by March 2019 deadline.
NY	Town of Colonie		Not clear that governmental member applied by March 2019 deadline.
NY	Town of Canadaigua		Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
NY	Town of Gates Official of Fire Marshal		Not clear that governmental member applied by March 2019 deadline.
NY	City of Saratoga Springs		Not clear that governmental member applied by March 2019 deadline.
NY	Ithaca Fire Dept		Not clear that governmental member applied by March 2019 deadline.
NY	Marbletown Environmental Conservation	Stone Ridge, NY	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
OH	Richland County	Mansfield, OH	Job title does not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
OH	City of Lakewood	Lakewood, OH	Not clear that governmental member applied by March 2019 deadline.
OH	City of Twinsburg	Twinsburg, OH	Not clear that governmental member applied by March 2019 deadline.
OH	Mifflin Township Div of Fire	Gahanna, OH	Not clear that governmental member applied by March 2019 deadline.
OH	Cincinnati Office of Env & Sustainability	Cincinnati, OH	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
OK	Lucas County Sustainability Dept	Toledo, OH	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
OR	City of Hood River Building Dept	Hood River, OR	Not clear that governmental member applied by March 2019 deadline.
OR	Multnomah County Office of Sustainability	Portland, OR	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
OR	Jackson County	Medford, OR	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
OR	Philomath Fire & Rescue	Philomath, OR	Not clear that governmental member applied by March 2019 deadline.
OR	Portland Housing Bureau	Portland, OR	Not clear that governmental member applied by March 2019 deadline.
OR	City of Portland Planning & Sustainability	Portland, OR	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
OR	City of Sandy	Sandy, OR	Not clear that governmental member applied by March 2019 deadline.
OR	City of Wilsonville	Wilsonville, OR	Not clear that governmental member applied by March 2019 deadline.
OR	Deschutes County	Bend, OR	Not clear that governmental member applied by March 2019 deadline.
OR	Oregon Department of Energy	Salem, OR	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
PA	Borough of Doylestown	Doylestown, PA	Not clear that governmental member applied by March 2019 deadline.
PA	Borough of Jenkintown	Jenkintown, PA	Not clear that governmental member applied by March 2019 deadline.
PA	Township of Lower Macungie	Macungie, PA	Not clear that governmental member applied by March 2019 deadline.
PA	City of Philadelphia Office of Sustainability	Philadelphia, PA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws. • Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
PA	Pittsburgh Department of City Planning	Pittsburgh, PA	Not clear that governmental member applied by March 2019 deadline.
PA	Borough of Tamaqua	Tamaqua, PA	Not clear that governmental member applied by March 2019 deadline.
PA	Abington Township	Abington, PA	Not clear that governmental member applied by March 2019 deadline.
PA	Township of West Deer	Cheswick, PA	Not clear that governmental member applied by March 2019 deadline.
PA	Doylestown Township	Doylestown, PA	Not clear that governmental member applied by March 2019 deadline.
PA	Tinicum Township Code Enforce	Essington, PA	Not clear that governmental member applied by March 2019 deadline.
PA	PA Dept Environ Prot Offc Pltn Prev & Energy Asst	Harrisburg, PA	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
PA	Indiana County	Indiana, PA	Not clear that governmental member applied by March 2019 deadline.
RI	City of Providence	Providence, RI	Not clear that governmental member applied by March 2019 deadline.
RI	City of Lincoln	Lincoln, RI	Not clear that governmental member applied by March 2019 deadline.
SC	South Carolina Forestry Commission	Columbia, SC	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
SC	City of Inman	Roebuck, SC	Not clear that governmental member applied by March 2019 deadline.
SC	Myrtle Beach Fire Dept	Myrtle Beach, SC	Not clear that governmental member applied by March 2019 deadline.
SD	<i>none</i>	<i>none</i>	

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
TN	City of Johnson City	Johnson City, TN	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	Elk River Public Utility District	Tullahoma, TN	<ul style="list-style-type: none"> • Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	City of Eastridge	Chattanooga, TN	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	City of Maryville	Maryville, TN	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	City of Sevierville	Sevierville, TN	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	Pleasant View Vol. Fire Dept	Pleasant View, TN	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	Metro Govt. of Nashville/Davidson	Nashville, TN	Job titles do not indicate "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	Sevier County Utility Dist	Sevierville, TN	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	City of Knoxville Plans & Inspns	Knoxville, TN	Not clear that governmental member applied by March 2019 deadline.
TN	City of Sevierville	Sevierville, TN	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
TN	Tennessee Dept of Environment & Conservation	Nashville, TN	<ul style="list-style-type: none"> • Not clear that governmental member applied by March 2019 deadline. • Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	Greater Dickson Gas Authority	Dickson, TN	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TN	Middle Tenn Natural Gas Utility District	Smithville, TN	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
TX	City of Burleson	Burleson, TX	Not clear that governmental member applied by March 2019 deadline.
TX	Travis County ESD No 6	Austin, TX	Not clear that governmental member applied by March 2019 deadline.
TX	Travis County ESD No 9	Austin, TX	Not clear that governmental member applied by March 2019 deadline.
TX	Town of Addison	Addison, TX	Not clear that governmental member applied by March 2019 deadline.
TX	City of Plano Fire-Rescue	Plano, TX	Not clear that governmental member applied by March 2019 deadline.
TX	City of Victoria	Victoria, TX	Not clear that governmental member applied by March 2019 deadline.
TX	City of Leander	Leander, TX	Not clear that governmental member applied by March 2019 deadline.
TX	City of Abilene	Abilene, TX	Not clear that governmental member applied by March 2019 deadline.
TX	State of Texas Energy Consvrtn Office	Austin, TX	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
UT	Grand County	Moab, UT	Not clear that governmental member applied by March 2019 deadline.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
UT	City of Logan	Logan, UT	Not clear that governmental member applied by March 2019 deadline.
VA	Richmond Office of Sustainability	Richmond, VA	Not clear that governmental member applied by March 2019 deadline.
VA	Orange County	Orange, VA	Not clear that governmental member applied by March 2019 deadline.
VA	Grayson County	Independence, VA	Not clear that governmental member applied by March 2019 deadline.
VA	Rockbridge County	Lexington, VA	Not clear that governmental member applied by March 2019 deadline.
VA	Amherst County	Amherst, VA	Not clear that governmental member applied by March 2019 deadline.
VA	Rockingham County	Harrisonburg, VA	Not clear that governmental member applied by March 2019 deadline.
VA	City of Franklin	Franklin, VA	Not clear that governmental member applied by March 2019 deadline.
VA	Richmond Office of Sustainability	Richmond, VA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
VA	Virginia Dept of Mines, Minerals, and Energy	Richmond, VA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
VA	Virginia Dept of Transportation	Lynchburg, VA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
VA	Roanoke City Public Schools	Roanoke, VA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
VT	<i>none</i>	<i>none</i>	
WA	Tacoma Environmental Services	Tacoma, WA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
WA	City of Renton	Renton, WA	Not clear that governmental member applied by March 2019 deadline.
WA	City of Burien	Burien, WA	Not clear that governmental member applied by March 2019 deadline.
WA	Pierce County	Tacoma, WA	Not clear that governmental member applied by March 2019 deadline.
WA	Snoqualmie Planning Division	Snoqualmie, WA	Not clear that governmental member applied by March 2019 deadline.
WA	City of Port Angeles	Port Angeles, WA	Not clear that governmental member applied by March 2019 deadline.
WA	Snohomish County Government	Everett, WA	Not clear that governmental member applied by March 2019 deadline.
WA	Adams County	Othello, WA	Not clear that governmental member applied by March 2019 deadline.
WA	City of Port Orchard	Port Orchard, WA	Not clear that governmental member applied by March 2019 deadline.
WA	City of Ferndale	Ferndale, WA	Not clear that governmental member applied by March 2019 deadline.
WA	City of Camas	Camas, WA	Not clear that governmental member applied by March 2019 deadline.
WA	City of Bellevue	Bellevue, WA	Not clear that governmental member applied by March 2019 deadline.
WA	City of Puyallup	Puyallup, WA	Not clear that governmental member applied by March 2019 deadline.
WA	Tacoma Power & Public Utilities	Tacoma, WA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
WA	Washington State Energy Office	Olympia, WA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
WA	Washington State Dept of Health	Shoreline, WA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.

STATES	GOVERNMENTAL MEMBER	CITY/STATE	COMMENTS
WA	Washington State Dept of Natural Resources	Olympia, WA	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
WV	West Virginia Office of Energy	Charleston, WV	Department does not appear to be "actively engaged" in the "administration, formulation, implementation, or enforcement" of laws.
WI	<i>none</i>	<i>none</i>	
WY	Town of Guernsey	Guernsey, WY	Not clear that governmental member applied by March 2019 deadline.
WY	Campbell County Fire Department	Gillette, WY	Not clear that governmental member applied by March 2019 deadline.