

## City of Somerville, Massachusetts Joseph A. Curtatone Mayor

January 8, 2021

ICC Board of Directors

Via email: memberinput@iccsafe.org

Dominic Sims
CEO, International Code Council
Via email: DSims@iccsafe.org

Dear ICC Board of Directors and Mr. Sims:

I am writing you to share my serious concerns about decision of the recommendation from the Long Term Code Development Process Committee (LTCDP) to eliminate the International Energy Conservation Code (IECC) and to replace it with a standard. As the Mayor of Somerville, MA and the chair of the Metro Mayors Coalition, a coalition of 15 cities and towns in the urban core of Metro Boston, I strongly urge the Board to reject this change. It is important for local government officials who enforce and rely on the IECC to have a say in its development. This is a priority for Somerville, and our region, as echoed in the letter submitted on behalf of the Metro Mayors Coalition by the Metropolitan Area Planning Council.

The proposed change would have serious implications, as it would remove a democratic method of participation for local governments. Local governments, including staff from Somerville, have participated in the code development processes for years and provide essential input to ensure codes are meeting the needs of our community members.

Massachusetts adopts the international model codes, including the IECC, as our base codes with a handful of local amendments. As a municipality in Massachusetts, we are responsible for enforcing the codes that are set at the state level. We rely on strong and effective model codes to ensure that our buildings are safe, healthy, efficient and resilient, and the IECC is a key component to that.

It is imperative that local governments continue to have a say in the IECC, as we are ultimately responsible for enforcing the code. I implore the ICC Board to maintain the democratic process, by which governmental members make the final decisions on the code. Without democratic and







widespread input from governments, the value of the IECC will be diminished because the resulting standard will be less trustworthy.

Finally, the proposed change is surprising, and the timing is rushed. There has been woefully insignificant engagement of governmental members on this highly important issue and the entire effort appears to be favoring industry stakeholders over governmental members. As local government, it is our duty to protect and promote the health, safety, and welfare of our communities, and we provide an essential function in the code development process.

I urge you to reject the change outright and to create more transparent processes for Governmental Members to provide input on any significant future changes to the IECC that may be considered.

Respectfully,

Joseph Curtatone

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Mayor



