



City of Boston
Environment



City of Boston
Mayor Martin J. Walsh

January 11, 2021

ICC Board of Directors

Via email: memberinput@iccsafe.org

Dominic Sims

CEO, International Code Council

Via email: DSims@iccsafe.org

RE: Public Comment Period on the IECC

Dear ICC Board of Directors and Mr. Sims:

On behalf of the City of Boston, I am writing to express our opposition to the Code Council Board's proposal to change the process for updating the International Energy Conservation Code (IECC) from the current one, which requires the online governmental consensus vote (OGCV), to the ICC standards process, which does not.

This proposed change is unnecessary, unwarranted, and undemocratic. The current process, which provides opportunities for input from a wide range of industry and government experts, has worked well. Officials from the City of Boston are engaged in each code cycle, because the international code directly impacts City policy and operations. The Massachusetts State Building Code and the Stretch Energy Code are composed of the IBC, IRC, IECC, IFC, and additional I-Codes with state-specific amendments. The City of Boston and other state and municipal governments implement and interpret these codes every day. Our officials are well positioned to speak to the feasibility, usefulness, and impact of code proposals, and should continue to have a direct role as the final decision makers on the content of the IECC.

If some modifications in the current process were warranted, we would be willing to engage in a more transparent process than the current one to discuss them. However, the current major structural change is unacceptable. I urge you to reject the change outright.

Respectfully,
Christopher Cook
Chief, Environment, Energy, and Open Space
City of Boston