



Ruthanne Fuller  
Mayor

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January 11, 2020

ICC Board of Directors, [memberinput@iccsafe.org](mailto:memberinput@iccsafe.org)  
Dominic Sims, CEO, ICC, [DSims@iccsafe.org](mailto:DSims@iccsafe.org)

RE: City of Newton Comments on the International Energy Conservation Code (IECC)

Dear ICC Board of Directors and Mr. Sims:

We are writing to communicate our deep disagreement with the Code Council Board's proposed framework for updating the IECC using the ICC standards process. We strongly advocate for the final determination of IECC provisions to remain in the hands of local officials. We urge the ICC Board of Directors to uphold the current structure of the online governmental consensus vote and to reject the proposed framework for switching the IECC to the ICC standards process.

As you well know, the IECC strongly and directly impacts local policy. The Massachusetts State Building Energy Code and the Stretch Energy Code, an above-code appendix to the State Building Energy Code, are based on the IECC, with state-specific amendments. Massachusetts is statutorily required to begin the adoption of new I-Codes within one year of their publication, and all Massachusetts cities and towns must comply with either the Base Code or the Stretch Energy Code.

A strong IECC with a thorough development review process by and with decision-making by local officials helps to ensure that progress towards greater energy efficiency can continue to be made at both a local and state level. Local governmental stakeholders like those from our community are well positioned to speak to the feasibility and usefulness of code proposals, and should continue as the final decision makers on the content of the IECC.


In the City of Newton, 70 local officials voted as part of the process. This may seem extraordinary, but it reflects the deep appreciation of the importance of building codes for our community. Apart from the obvious voting participants, such as members of the Sustainability Office, other City departments and boards such as the Planning Department, the Inspectional Services Department, the Public Buildings Department, the Design Review Committee, and the Energy Commission all understand how crucial building codes are to the City's ability to achieve its 2050 net-zero Climate Action Plan goal.

The IECC is of further importance to us because it does more than promote energy-efficient buildings. It also benefits vulnerable residents, protects public health in general, leads to lower operational costs for buildings while reducing greenhouse gas emissions, and promotes resilience and safety.

We strongly urge you to uphold the current role of local governmental stakeholders in IECC voting and to avoid in any way reducing stakeholder input.

Thank you for your attention to these comments.

Sincerely,

  
Ruthanne Fuller  
Mayor

  
Ann G. Berwick  
Co-Director of Sustainability