



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 Metropolitan Mayors Coalition (MMC) Climate Preparedness Taskforce, the Metropolitan Area Planning Council (MAPC) is writing to communicate its deep disagreement with the Code Council Board's proposed framework for updating the International Energy Conservation Code (IECC) using the ICC standards process. We strongly advocate for the final determination of International Energy Conservation Code (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 (OGCV) and to reject the proposed framework for switching the IECC to the ICC standards process.

This proposed change seems unnecessary, unwarranted, and inappropriate. We greatly appreciated the inclusive manner by which the ICC conducted the 2019 OGCV. It was critically important that the OGCV engaged and enabled widespread participation in the 2021 IECC development and final determination process. Removing the democratic process from the determination of the energy code would be seriously unfortunate.

MAPC is the regional public agency serving the people who live and work in the 101 cities and towns of Metropolitan Boston. The MMC is a group of 15 cities and towns in the urban core of Metro Boston whose leaders have gathered to exchange information and create solutions for common challenges since 2001. MAPC facilitates both the Metro Mayors Coalition and its Climate Taskforce, through which the 15 municipalities have pledged to work together to prepare the region for climate change and reduce greenhouse gas emissions since 2015. The municipalities in this coalition represent more than 1.4 million Massachusetts residents across the municipalities of Arlington, Boston, Braintree, Brookline, Cambridge, Chelsea, Everett, Malden, Medford, Melrose, Newton, Quincy, Revere, Somerville, and Winthrop.

Each municipality in the MMC has opted to adopt the Massachusetts Stretch Energy Code, an above-code appendix to the State Building Energy Code. The MMC has additionally committed to attain net zero carbon status as a region by 2050. The communities are committed to build a future for our region in which residents are not only housed, but are safe, healthy, and resilient. A strong IECC with a thorough development review process dependent on local officials from throughout the country helps to ensure that solid progress can continue to be made toward these commitments in the region and the state.

Massachusetts local officials are engaged in each ICC code cycle because I-Codes directly impact local

policy. 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. Massachusetts is statutorily required to begin the adoption of new I-Codes within one year of their publication. Municipalities implement and interpret these codes every day, through the actions of their building inspectors, sustainability directors, public safety officials, city councilors, planning boards, and others. **Local governmental stakeholders are well positioned to speak to the feasibility and usefulness of code proposals, and should continue to have a direct role as the final decision makers on the content of the IECC.**

The IECC is of particular importance to this Taskforce not only because it produces more energy-efficient buildings for owners and occupants, but also because an energy-efficient building code benefits low-income housing programs, public health outcomes, building operational costs, the stability of the power grid, peak demand reductions, climate commitments, and building resilience and safety. We consider the life and safety implications of this code to align with our inherent duty to protect and improve the wellness of our region's residents. We trust in its outcome due to the transparent and inclusive nature of the governmental voting process, particularly as it has moved online where many more local governmental stakeholders can engage and participate. Entrusting the IECC content and final decisions to a small committee selected by the ICC Board would not reflect the views of the governmental members who actually utilize the code, no matter how well-intentioned the attempt might be.

The majority of our MMC municipalities robustly participated in the 2019 OGCV. Attending code development proceedings and public hearings in person would present a financial burden for many municipalities in our state. The ability to submit code proposals, comments, and votes online was important to enabling the MMC municipalities, as well as many others, to have a voice in a series of critical code provisions that directly impact local proceedings and the health of our communities. We strongly urge you to uphold and bolster the inclusive and participatory process dependent on local governmental stakeholders for the IECC final voting. We strongly urge disapproval of any attempt to replace this with an ICC standards process or to otherwise weaken the input of governmental members throughout IECC development, selection, and final voting. This decision would greatly concern us and MMC members.

Thank you for your consideration of our comments and attention to these important issues. For any questions related to our comments, please contact MAPC Director of Clean Energy, Cammy Peterson, at cpeterson@mapc.org.

Sincerely,



Rebecca Davis
Deputy Director
Metropolitan Area Planning Council