January 8, 2021

ICC Board of Directors
memberinput@iccSAFE.org

Dominic Sims
CEO, International Code Council
DSims@iccSAFE.org

RE: Public Comment Period on the International Energy Conservation Code (IECC)

Dear ICC Board of Directors and Mr. Sims,

I am the Energy and Sustainability Director for the City of Quincy, Massachusetts, and I work out of the Public Buildings Department. Along with other relevant employees of the City of Quincy, I participated in voting through the online governmental consensus vote (OGCV) process in November 2019.

On behalf of the City of Quincy, I want to express our strong concern about the proposal to remove the current structure which enables local government participation in the IECC voting process. We urge you to reject the proposal that would switch to the ICC standards process, and weaken local government members’ input. Due to the financial and practical hardship, it is unrealistic for us, and others, to attend in person public hearings and code development proceedings.

As a coastal community strongly affected by climate change, the City of Quincy is concerned that building construction and renovation meets strong energy efficiency standards, are healthy and safe, and resilient. We recognize that most construction is built only to current building and energy code standards, and does not exceed code. Building construction in the City of Quincy is governed by the Massachusetts State Building Energy Code and the Stretch Energy Code. Since the Massachusetts State Building Energy Code adopts new I-Codes within a year of their publication, we are directly influenced by the content of the IECC.

We feel that members of local governments, including those from our city, are informed and appropriate to vote on the feasibility and usefulness of energy code change proposals. We ask to continue to have a direct role in determining the content of the IECC. We urge you to continue the current online governmental consensus vote process, which enabled robust participation in determining the 2021 International Energy Conservation Code.

Thank you, in advance, for your consideration.

Shelly Dein, Energy and Sustainability Director

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