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ICC Board of Directors  
Via email: [memberinput@iccsafe.org](mailto:memberinput@iccsafe.org)

Dominic Sims  
CEO, International Code  
Council Via email:  
[DSims@iccsafe.org](mailto:DSims@iccsafe.org)

Dear ICC Board of Directors and Mr. Sims:

The City of Worcester is writing to share our disapproval of 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. Removing the democratic process from the determination of the energy code would be unacceptable.

**The IECC 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 cities and towns must comply with either the Base or Stretch Building Energy Code. City of Worcester follows the Stretch Code and is invested in safe, healthy, and efficient buildings. City of Worcester is also in the process of adopting its new Green Worcester Plan, which has the vision to make Worcester the most sustainable and climate-resilient mid-sized city in America by 2050. One of the plan's overarching goals is to **require new buildings to be net zero and climate resilient, and promote deep energy retrofits of existing buildings.** In line with these goal, the City proudly participated in the 2019 OGCV process and voted on the IECC, and looks forward to do so again in the future.

A strong IECC with a thorough development review process dependent on local officials helps to ensure that strong progress can continue to be made toward these commitments in Worcester and the state. As local governmental stakeholders, governmental members like those from our community 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 us because it produces more energy-efficient buildings while

also positively benefiting vulnerable residents, public health outcomes, building operational costs, greenhouse gas emissions reductions, resilience, and safety. We strongly urge you to uphold the current role of local governmental stakeholders in IECC final voting. **We strongly urge you to reject any attempt to replace this with an ICC standards process or to otherwise weaken the input of governmental members.** Thank you for your attention to these comments.

Sincerely,



John Odell  
Energy and Asset Management Division  
City of Worcester