

From: Anne O'Connor <aoconnor@williamstownma.gov>
Sent: Monday, January 11, 2021 10:34 AM
To: Member Input <memberinput@iccsafe.org>; Dominic Sims <DSims@iccsafe.org>
Subject: Public Comment Period on the IECC

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, concerning governmental member voting process

Dear ICC Board of Directors and Mr. Sims:

As a member of the Select Board of Williamstown, Massachusetts, I am writing to share my disapproval of the Code Council Board's proposed framework for updating the International Energy Conservation Code (IECC) using the ICC standards process. As a local official, I cannot overstate the importance of allowing the final determination of International Energy Conservation Code (IECC) provisions to remain in the hands of local officials. Not having governmental representation in determining the codes we will ultimately be asked to interpret and enforce is misguided.

I ask 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. Please do not remove the democratic process from the determination of the energy code.

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.

The Town of Williamstown follows the Stretch Code and is invested in safe, healthy, and efficient buildings — as is the leading institution in our town, Williams College. Our local inspection officials have direct experience assisting property owners with the Stretch Code, as well as with institutional buildings designed to meet LEED Gold standards and one of the only collegiate residence halls in the Commonwealth of Massachusetts that meets the energy efficient standards of the Passive House Institute US.

A strong IECC with a thorough development review process dependent on local officials helps to ensure continued progress toward these commitments in Williamstown 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,

Anne O'Connor
31 North St
Williamstown, MA 01267

--

Anne O'Connor
Member, Williamstown Select Board
she | her | hers