



CITY OF FRAMINGHAM
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MEMORIAL BUILDING
150 Concord Street, Room 121
Framingham, MA 01702

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:

The City of Framingham, Massachusetts, 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. Framingham follows the Stretch Energy Code and is invested in safe, healthy, and efficient buildings. As one of Massachusetts' Green Communities, the City is committed to making its community more sustainable and resilient as well as becoming net zero by 2050. Outside of its efforts to reduce municipal energy consumption, the City is working directly with its local utility on the second year of its campaign to help its homes and local small businesses improve their energy efficiency, reduce their greenhouse gas emissions, and save on energy costs. To further support building efficiency, the City of Framingham proudly participated in the 2019 OGCV process and voted on the IECC due to its importance in the community.

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. **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 critical 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 and 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,

Shawn M. Luz, Sustainability Coordinator
City of Framingham

Michael A. Tusino, Director/Building Commissioner
City of Framingham