



**CITY OF BOSTON  
IN CITY COUNCIL**

January 11, 2021

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)

RE: Public Comment Period on the IECC

Dear ICC Board of Directors and Mr. Sims:

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. I strongly advocate for the final determination of International Energy Conservation Code (IECC) provisions to remain in the hands of local officials. I also 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. The City of Boston follows the Stretch Code and is invested in safe, healthy, and efficient buildings. Buildings contribute to three-quarters of greenhouse gas emissions in the City of Boston. The Boston City Council is committed to reducing reliance on fossil fuels and achieving carbon neutrality by 2050. As the Chair of the Environment, Resiliency and Parks Committee, I was proud to participate in the 2019 OGCV process with my colleagues on the council. We voted on the IECC due to its importance to our 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 in the City of Boston 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,

A handwritten signature in black ink that reads "Matt O'Malley". The signature is fluid and cursive, with a long, sweeping underline that extends to the right.

**City Councilor Matt O'Malley**  
*Boston City Council District 6*