



August 17, 2020

2019 Group B Appeals Board
c/o Michael J. Pfeiffer
Senior Vice President of Technical Services, International Code Council
Via email: MPfeiffer@iccsafe.org

Greg Wheeler, CBO
CBO President, International Code Council
Via email: GWheeler@iccsafe.org

Dominic Sims
CEO, International Code Council
Via email: DSims@iccsafe.org

RE: Final Action on ICC 2019 Group B Code Changes

Dear Mr. Pfeiffer, Mr. Wheeler, and Mr. Sims:

On behalf of the Metropolitan Mayors Coalition (MMC) Climate Preparedness Taskforce, the Metropolitan Area Planning Council (MAPC) is writing to share our strong support for the 2019 Group B Online Government Consensus Vote (OGCV) process and 2021 International Energy Conservation Code (IECC) voting outcomes. We urge final action to uphold the outcomes of the OGCV. Moreover, we would like to express our appreciation for the inclusive and accessible manner by which the ICC conducted the 2019 OGCV. It was critically important that the OGCV engaged and enabled widespread participation in the 2021 IECC development process.

MAPC is the regional public agency serving the people who live and work in the 101 cities and towns of Metropolitan Boston. The Metro Mayors Coalition is a group of 15 cities and towns in the urban core of Metro Boston whose leaders have gathered to exchange information and create solutions for common challenges since 2001. MAPC facilitates both the Metro Mayors Coalition and its Climate Taskforce, through which the 15 municipalities have pledged to work together to prepare the region for climate change and reduce greenhouse gas emissions since 2015. The municipalities in this coalition represent more than 1.4 million Massachusetts residents across the municipalities of Arlington, Boston, Braintree, Brookline, Cambridge, Chelsea, Everett, Malden, Medford, Melrose, Newton, Quincy, Revere, Somerville, and Winthrop.

Each municipality in the MMC has opted to adopt the Massachusetts Stretch Energy Code, an above-code appendix to the State Building Energy Code. The MMC has additionally committed to attain net zero status as a region by 2050. The communities are committed to build a future for our region in which residents are not only housed, but are safe, healthy, and resilient. A strong IECC with a thorough development review process helps to ensure that strong progress can continue to be made toward these commitments in the region and the state.

Massachusetts municipalities are engaged in each code cycle because international code directly impacts local policy. The Massachusetts State Building Code and the Stretch Energy Code are composed of the IBC, IRC, IECC, IFC, and additional I-Codes with state-specific amendments. Additionally, upcoming code proposals and ICC committee decisions are followed to understand how the nation is continually improving the I-Codes. Massachusetts is required to begin the adoption of new I-Codes within one year of their publication. Municipalities implement and interpret these codes every day and are well positioned to speak to the feasibility and usefulness of code proposals.

The IECC is of particular importance to this Taskforce not only because it produces more energy-efficient buildings for owners and occupants, but also because an energy-efficient building code benefits low-income housing programs, public health outcomes, building operational costs, the power grid, peak demand reductions, and building resilience and safety, among other systems. We consider the life and safety implications of this code to align with our inherent duty to protect and improve the wellness of our region's residents.

The majority of our MMC municipalities are governmental members of the International Code Council and eagerly participated in the OGCV in 2019. Attending code development proceedings and public hearings in person would present a financial burden for many municipalities in our state. The ability to submit code proposals, comments, and votes online was important to enabling the MMC municipalities, as well as many others, to have a voice in a series of code provisions that directly impact local proceedings and the health of our communities. We were gratified to see the ICC validate and certify the 2019 OGCV vote. We urge you again to uphold those results, and look forward to similarly inclusive and participatory processes in future cycles.

Thank you for your consideration of our comments and attention to these important issues. For any questions related to our comments, please contact MAPC Clean Energy Director, Cammy Peterson, at cpeterson@mapc.org.

Sincerely,



Rebecca Davis
Deputy Director
Metropolitan Area Planning Council