

**From:** Ken Pruitt <[kpruitt@town.arlington.ma.us](mailto:kpruitt@town.arlington.ma.us)>

**Sent:** Friday, January 8, 2021 3:27 PM

**To:** Member Input <[memberinput@iccsafe.org](mailto:memberinput@iccsafe.org)>; Dominic Sims <[DSims@iccsafe.org](mailto:DSims@iccsafe.org)>

**Subject:** Public Comment Period on the IECC

January 8, 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:

On behalf of the Town of Arlington, Massachusetts, I am 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.

Arlington follows the Stretch Code and is invested in safe, healthy, and efficient buildings. Arlington has established strong energy conservation and greenhouse gas pollution reduction goals. These include a 2010 commitment to reducing municipal energy use by 20 percent within five years (which we accomplished), requiring all new municipal buildings to meet LEED Silver status, and a 2018 commitment to reduce greenhouse gas pollution from all sectors (municipal, residential and commercial) to net zero by 2050. In November, 2020, Arlington also passed a bylaw prohibiting fossil fuel infrastructure in new construction and major renovations. The Town of Arlington proudly participated in the 2019 OGCV process and 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 Arlington 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,

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