

To: Members of the Board of Building Regulations and Standards (BBRS)
From: 11th Edition Process Subcommittee
Date: 04/03/25
Subject: Report on Recommendations for the 11th Edition of the Massachusetts Building Code

Introduction

The 11th Edition Process Subcommittee has conducted extensive discussions and evaluations regarding the upcoming building code edition. This report outlines the key recommendations, tracking improvements, and proposed structural adjustments necessary to ensure a clear and efficient process for code development.

Key Recommendations

1. General

- **Recommendation:** BBRS should vote to reaffirm previously held position that it should adopt the model codes developed by ICC with the least amount of Massachusetts amendments as is practical. The board recognizes the IECC is required to be adopted but should reserve the right to amend the energy code.

2. Drafting Process & Formatting

- **Recommendation:** In keeping with the Massachusetts Secretary of State's printing requirements, and applying to both Technical Advisory Committees (TAC) and general public code change proposals, adopt a **front-end amendment approach** instead of code change proposals that embed amendments within model code language.

3. BBRS/TAC Code Review & Amendments

- **Recommendation:** In lieu of using base ICC language, require evaluation of all Massachusetts amendments from the 10th Edition to determine, via written justification, why such amendments should be carried forward into the 11th edition.
- **Recommendation:** In lieu of using base ICC language, require written justification for any new amendments proposed for the 11th edition to address state-specific concerns.
- **Recommendation:** For reference use by BBRS and TAC's, obtain the **ICC comparison document (*2024 Significant Changes to the International Building Code*)** to understand changes between **2021 and 2024** editions.

4. Code Change Proposal Process

- **Recommendation:** Modify the **code change proposal form** by replacing (background / rationale) with the following:
 - *"Why is the ICC base code language not adequate/sufficient?"*
- **Recommendation:** *"Why is the ICC base code language not adequate/sufficient?"*
 - Require TAC's and general public to answer this question for all 10th edition MA amendments proposed for inclusion in the 11th edition.

- Require TAC's to answer this question for any change they propose to the base ICC code language for adoption in the 11th edition.

5. TAC Assignments & New Subcommittees (see TAC Assignment attachment)

- **Recommendation:** Establish new subcommittees:
 - **IRC Subcommittee**
 - **Greenhouse/Cannabis Subcommittee**
 - **Climate Resiliency** – should be combine with Coastal Subgroup
- **Recommendation:** Establish a formal relationship between the **Energy Advisory Committee (EAC)** and the **Department of Energy Resources (DOER)**, with bimonthly reporting to BBRs.

6. Consensus Process for TAC Proposed Amendments

- **Recommendation:** Require TAC's to reach a **70% consensus** before approving amendments.
- **If consensus isn't reached**, the issue may be escalated to the **full BBRs**.
- **Dispute resolution:** Representatives from each side will present their case to BBRs, which will provide feedback within **two meetings**.

7. Code Change Proposal Management / Internal Tracking of Code Changes (see attached Tracking Log)

- **Recommendation:** Require BBRs to appoint one person as **code change leader** responsible for inputting data into the tracking log.
- **Recommendation:** Require each TAC to appoint one person as **code change leader** responsible for inputting data into the tracking log, and preparing code change proposal forms.
- **Recommendation:** Implement an **internal tracking system** to monitor TAC and BBRs review progress.
- **Recommendation:** Implement a **naming convention** for proposals: (Refer to Tracking Log)
- **Recommendation:** Link each proposal to relevant **chapters and sections** in the tracking document.

8. Public Input & Review Process / Concurrency Periods for Interim 10th Edition Changes

- **Recommendation:** Review public input **quarterly** instead of waiting for statutory public hearings.
- **Recommendation:** BBRs should create a **guidance document** to standardize public input handling.
- **Recommendation:** For a **technical or grammatical** change only - No new concurrency period should be required for any 10th edition submission that is still pending review (i.e. The Board approved reference was NFPA 241 -2022, but the effective code lists NFPA 241 - 202)
- **Recommendation:** For **substantive changes** - present all previously tabled **10th Edition proposals** to the **BBRs at the start of the 11th Edition process** for review, sorting, and

assignment to the appropriate TAC's to determine whether the proposal requires amendment to the 10th edition or can be deferred to the 11th edition.

9 . 11th Edition Draft Timeline (see attached proposed Schedule)

- **Note:** Staff limitations will only allow for three TAC's to meet concurrently.

10. Staff Role in the 11th Edition Process

- **Note:** TAC's and BBRs are required to lead the drafting process, with staff providing **administrative and legal support** as needed.

Conclusion

The 11th Edition Process Subcommittee recommends a streamlined and transparent approach to code development by reaffirming minimal state amendments to ICC model codes, adopting a standardized front-end amendment format for submissions, and requiring written justification for all current and future amendments. Emphasis is placed on enhancing TAC functionality through clearer assignments, consensus requirements, and formalized tracking and reporting systems. The subcommittee also proposes increased public input opportunities, improved proposal management, and targeted review of pending 10th edition changes to ensure only necessary interim updates are made. These recommendations aim to improve efficiency, consistency, and stakeholder engagement throughout the code revision process.

We look forward to the BBRs's guidance and approval on these recommendations.

Respectfully submitted,

11th Edition Process Subcommittee

Lisa Davey – Chair, BBRs Member

Sy Nguyen – BBRs Member

Luke McKneally – BBRs Member

Tarika Leskiw – BBRs Member

John Nunnari – Public Member