

Finlayson, Ian (ENE)

From: Amy Latva-Kokko <alatvakokko@dskap.com>
Sent: Friday, 12 August 2022 2:27 PM
To: STRETCHCODE (ENE)
Subject: BUILDING CODE COMMENTS

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Dear DOER:

Thank you for the herculean effort to get the next code revisions done. As an architect registered in Massachusetts and Certified Passive House Designer, I am excited about these new codes, because the Stretch code and Municipal Opt-in do conservation strategies with existing buildings that have not been required before. The introduction of TEDI, thermal energy demand intensity, pathway for buildings over 20,000 sf is a welcome addition because it helps us focus on building envelope. The updated HERS rating targets will significantly reduce operational energy.

- If we can eliminate fossil fuels in the Municipal Opt-in option and still get the code issued January 1st 2023, great, do it. However, the legislation that Governor Baker passed August 11th, which will allow up to 10 towns to go fossil fuel free, releases a bit of pressure on the building code to do that. Perfection is the enemy of the good in this case because we will be able to begin to incorporate the code rather than send it for a whole other round of edits in which case we might not start implementing the code until 2024. We need to be on the fossil-fuel free trajectory, but if getting there will require a delay in the code, I would hold off.
- Please do revise the definition of renovation threshold- do not use cost, but 50% square feet.
- If there are dedicated replacement funds for Renovation Level 1, then it would be acceptable to require netzero compliance. However, my concern is that the cost threshold will deter lower income owners from doing the important work of window and roof replacements.

Training and Support for those implementing this improvement

It is well worth it, but we will need to keep track of which code is required in a given municipality where we are doing work.

- In some towns, they will use the IECC 2021 with MA amendments.
- Green Communities will use IECC 2021 with MA amendments and Stretch Code amendments.
- Those towns and cities that vote to adopt the specialized code will use the IECC 2021 with MA amendments plus Stretch Code amendments plus Specialized Code Appendices.
- Training for all segments of the building industry should be offered through grants to support the Mass Work force.
- Training for building inspectors will be key. Unequal enforcement of the code can be due to lack of understanding of the requirements.
- Also important will be training for builders and the trades as they will experience the most changes.

- There should be educational support to the AEC community around learning TEDI modeling, on awareness of IECC 2021 and three different amendments and appendices, and for carbon footprinting, as if this is not added in this round of municipal opt-in codes, it will be in the next round in three years.
- In addition, Mass Save should consider providing grant funding for purchase of WUFI Passive to encourage the AEC community to reach the far-goals of Phius ZERO certification, the most stringent of the three compliance pathways in the Commercial Specialized Code.

Sincerely,
Amy

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