



**Home Builders &
Remodelers Association
Massachusetts**

June 14, 2016

Board of Building Regulation and Standards

Attention: Felix Zemel

Dear Felix:

As the current President of the Home Builders and Remodelers Association of MA (HBRAMA) I would like to express our concerns to the proposed energy code amendments to the state building code.

The HBRAMA is a statewide trade association that is affiliated with both local homebuilder and remodeler associations and the National Association of Home Builders. The more than 1,400 member companies of the HBRAMA are involved in all aspects of the development, construction and sale of new single- and two-family homes, townhomes, condominiums and apartments.

The HBRAMA has reviewed the proposed amendments to the State Building Code and are opposed to N1104.2 (R404.2), Mandatory Electric Vehicle Service Equipment (EVSE) ready, and Appendix U, Solar-ready zone area. It is our position that that these amendments be removed.

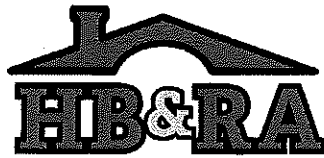
The HBRAMA has consistently supported amendments to the State Building Code that enhance life- safety in residential structures where their benefits clearly exceed their costs and their adoption would not undermine housing affordability. We believe these amendments conflict with executive order 562.

It is our opinion that the proposed N1104.2 (R404.2), Mandatory Electric Vehicle Service Equipment (EVSE) ready requirement does not fall under the scope of the powers and duties of the BBRS as provided by M.G.L. ch. 143, sections 94 and 95. It is unrelated to the BBRS's mandate of life safety/public safety and does not provide for energy conservation of the home.

We believe that homeowners and builders should have a choice to install or prep for a solar roof system installation. Mandating provisions for something that may happen in the future, and especially for technology that is constantly changing, is an unneeded mandated burden on all.

It is our position that the cost of these energy amendments exceed any benefit that would result from mandatory regulation and believe they exceed federal requirements.





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The already high housing costs in Massachusetts are continually increasing due to the effect of added codes and regulations that taken alone may not seem to be of consequence but the compounding effect is quite real to the high cost of this housing.

In conclusion, the building code is and should be a minimum standard, which should consider all the costs of building construction as well as provide for "health, safety, energy conservation and security."

Sincerely,

Elizabeth C. Kovach
President
Home Builders and Remodelers Association of MA