

Finlayson, Ian (ENE)

From: Edward McIntyre <emcintyre1@comcast.net>
Sent: Tuesday, 8 March 2022 4:01 PM
To: STRETCHCODE (ENE)
Subject: Stretch Code Straw Proposal Comments.

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Dear DOER
Here is my testimony to the March 7, Central MA region hearing.
Thank you
Ted McIntyre

Hello.

My name is Ted McIntyre

I live in Franklin MA

I serve on the Board of Directors of the Massachusetts Climate Action Network, an advocacy organization that empowers local communities to equitably decarbonize their buildings and municipal utilities.

Thank you for your effort in creating these new building codes. However, I am disappointed in the modest aspiration of the net zero (or specialized) building code that you have proposed.

The point of a specialized net-zero opt-in building code is to allow those towns that want to be aggressive climate leaders to have an aggressive building code to use as a tool. The specialized code as proposed does not meet this standard. It undercuts the value of the building code as a useful decarbonization tool because it's very definition of a 'net zero building' is based on improvements outside of the building itself. The code relies on an external plan to make the entire MA electrical grid 'net zero' as the means to make individual buildings 'net-zero.'

A building code is for buildings, and a net zero code should result in buildings that are energy efficient, all-electric, with low-embodied carbon in construction materials and that achieve their carbon neutral operations through the production and/or purchasing of renewable energy.

The consequence of your alternate definition of net zero is damaging. The provisions for natural gas heating, in an allegedly 'net zero' building code, is a clear violation of the goal to reduce emissions from buildings by design.

The straw specialized code you have proposed should be revised in the following ways:

- It should demand net zero status in the building itself.

- It should not allow gas hookups
- It should consider the carbon embodied in the building material.
- It should call for climate friendly refrigerants.
- It should include test and commissioning rules.
- It should minimize local exceptions to the code.

All these deficiencies need to be improved in the revision to the straw code you are now considering.

Let me also comment on these hearings themselves. Environmental justice is embodied in the law. A hearing dedicated to disadvantaged communities is a positive step. However, your scheduling that community's meeting for 5PM last Friday afternoon seems almost precisely intended to minimize participation from those communities. You should reschedule the EJ hearing.

The towns that would opt into this net zero/specialized code are self selecting, and want to do the utmost to address climate change. They need to be given the best tools to achieve their goals.

Please re-write the specialized net zero code to allow it to be a true net zero building code.