

## Finlayson, Ian (ENE)

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**From:** Patrick Patterson & Maria Wilkens <ppattmwilk@mac.com>  
**Sent:** Thursday, 28 July 2022 11:37 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** BUILDING CODE COMMENTS

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I am writing concerning the recently revised DOER Net Zero Stretch. We are pleased with many of the changes that were made to the original document, particularly the inclusion of existing buildings in both the updated and opt-in Net Zero Stretch Codes and the improved Net Zero Building Definition. There are however still a number of areas in which the Stretch Code can be significantly improved and thereby give us a better chance at meeting our 2030 and 2050 obligations of both the Roadmap Bill and the Global Warming Solutions Act.

It is great that electrification is required for 50% curtainwall buildings, but electrification must be required for all new buildings and major renovations. This is not just for homes over 4,000 square feet but all new construction. It is much more expensive to retrofit buildings than to do it right and the way it will soon have to be done the first time. Over 80% of existing building will still be in use in 2050 and most of those will have to be retrofitted. It is insane to add to that already daunting task by allowing new construction to use fossil fuels. Pre-wiring is not enough. The Massachusetts Attorney General's office has stated in its straw proposal comment letter that DOER can require electrification in the opt in net zero code and it is time to do so.

There needs to be greater clarification and expansion of on-site solar generation. All new and substantially renovated buildings should require on site solar panels in proportion to gross square feet, to the extent possible. This is not just those using fossil fuels but for all buildings. And for sure a Net Zero building does not utilize fossil fuels in any capacity and adding solar panels does not decarbonize the fuel being combusted. This sleight of hand does not fool anyone, nor does it help lower emissions. This is particularly dear to us as our house has solar panels and we have no fossil fuels in our house. We are not suffering with the rapidly increasing fuel costs, not to mention the negative health effects of combustion in the home. It should not just be available for those with the means to do so. There are already a number of successfully completed affordable housing projects in Massachusetts where the residents are living in safer, healthier conditions. An improved opt-in stretch code would further facilitate these cleaner, safer more affordable buildings,.

We know this process of decarbonization is even more complex than it initially appears. It's not just the carbon we are combusting that has to be eliminated or minimized, its also the carbon used to create the buildings. There are cost effective low carbon materials that can replace carbon intensive products and these products need to be mandated. And to know what is actually going on larger buildings should be required to do whole building life cycle analysis reporting so we can evaluate the effectiveness of these changes. And when doing this life cycle analysis the cost studies need to be revised to reflect current gas and electricity prices and to additionally add significant cost premiums for retrofitting fossil fuel heated buildings.

In closing it is time for DOER to create a true net zero op-in stretch code that would not allow fossil fuel heating and cooling. Every community should have the opportunity to adopt a true net zero stretch code through local democratic processes.

Thank you for allowing comments on the Net Zero Stretch Code. Please continue your hard work and make it better.

Sincerely,

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