

Finlayson, Ian (ENE)

From: STRETCHCODE (ENE)
Sent: Monday, 22 August 2022 1:30 PM
To: STRETCHCODE (ENE)
Subject: FW: Building Code Comments

----- Forwarded message -----

From: **Jesse Gray** <jesse.gray@gmail.com>
Date: Mon, Aug 8, 2022 at 3:12 PM
Subject: Building Code Comments
To: <stretchcode@ma.gov>

Thank you for the opportunity for feedback.

We need a real net-zero stretch code, and this isn't it.

My name is Jesse Gray, and I am the Chair of the Zero Emissions Advisory Board in Brookline. I also drafted Brookline's 2019 Fossil Fuel Free requirement, aka gas ban. This ban **may** now be possible to implement in a tiny minority of the Commonwealth, thanks to the gas ban pilot provision on the Governor's desk. But we need this kind of requirement across the Commonwealth, or the Commonwealth won't be meeting our legally binding emissions goals.

The AG has been rejecting Brookline's gas ban policy for years now, and one of the arguments of late has been that DOER was producing a net-zero stretch code to enable ANY community to opt-in to impose the net-zero requirements we need.

Net-zero isn't some kind of branding exercise. It has a specific meaning. It means that a building produces as much energy as it consumes. This optional code does not even attempt to achieve net-zero. Net-zero requires an equation, in which energy production and energy consumption are compared. That equation is missing entirely.

Even after all the feedback, the proposed code before us falls well short of that mandate.

To be clear, this is an **optional** net-zero code that will only apply to communities that adopt it. This means that what we don't permit, we bar communities from requiring. By NOT requiring net-zero, we are continuing to bar the vast majority of the Commonwealth from requiring net-zero. The issuance of this code perpetuates that injustice.

The inability of this stretch code to comply with the net-zero legislative mandate will increase costs dramatically. It will do so in four ways.

First, construction costs are currently on-par or superior for all-electric compared to conventional. The more we build all-electric, the bigger this construction differential will become. See for example detailed cost analysis from RMI. So basically, we're wasting money installing gas pipes.

Second, not requiring net-zero will increase lifecycle costs, by DOER's own analysis.

Third, not requiring net-zero will increase the cost of decommissioning our gas networks.

Finally, not requiring net-zero places the burden of decarbonizing onto the owners and occupants rather than the developers who should have done it in the first place.

We don't give consumers a choice to install lead paint or asbestos, and we shouldn't be allowing them to install poisonous gas that fuels climate catastrophe either.

A real net-zero stretch code should require all-electric, not just for large buildings but for all buildings. A real net-zero stretch code should require 100% EV-ready. A real net-zero stretch code would incorporate embodied carbon.

A real net-zero stretch code would have these details and more, but the most important thing is that it would be a real net-zero stretch code. It would actually require new buildings to be net-zero, with as much electricity production as consumption.

In closing, we need a real net-zero stretch code.

Thank you.

Jesse Gray, Brookline

Chair of Brookline's Zero Emissions Advisory Board