

## Finlayson, Ian (ENE)

---

**From:** David Reich <reichdj@gmail.com>  
**Sent:** Monday, 25 July 2022 4:12 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** BUILDING CODE COMMENTS

**CAUTION:** This email originated from a sender outside of the Commonwealth of Massachusetts mail system. Do not click on links or open attachments unless you recognize the sender and know the content is safe.

### Public Comments on 2022 Building Code Revisions

By David Reich and Martha Plotkin, 26 Phillips Street, Quincy, MA 02170; 617 770.4470

The revised building codes proposed by DOER represent a real advance over the status quo. Among other improvements, both versions of the revised stretch code require a 20% increase in energy efficiency compared to the base code, and both stretch codes will now apply to existing buildings, which should substantially accelerate the move toward greater efficiency at a time when Massachusetts law calls for precipitous drops in fossil fuel emissions. In addition, a technical advisory group comprising 20 building energy experts will clarify and strengthen language in the revised codes.

Nevertheless, we see at least three areas for further improvement to the opt-in code in particular if it is fully to reflect the urgency of the moment and the legislature's mandate to reduce emissions.

First, given the wide adoption and plummeting costs of solar panels, we believe it is not too much to ask that all new buildings have on-site solar in proportion to square footage. Not only will this help reduce toxic pollutants and GHG emissions, it will provide developers with a selling point and build in cost savings for occupants.

Second, municipalities should be able to vote to adopt the opt-in code as soon as it is finalized. Otherwise those with infrequent town meetings will have to wait up to six months to adopt the code, resulting in more new construction built to yesterday's standards.

Third and by far most importantly, the opt-in code must require full electrification of new construction. Super-efficient state-of-the-art air- or ground-source heat pumps have shown their ability to comfortably heat living spaces in New England while saving occupants substantial money on fuel. In addition, as our electricity supply gets greener and greener over the years, so will the heat pumps.

By contrast, natural gas heating and cooking subject building occupants to wild price fluctuations and saddle them with an outmoded technology that, when one accounts for methane leaks from pipelines and at the well head, results in GHG emissions that, according to several academic studies, approach or exceed those of coal furnaces and stoves.