

Re: Specialized Opt-in Building Code Comments

Dear Commissioner Woodcock, Secretary Card, and Secretary Kenneally,

I am a resident of a 400 person continuing care community in Lexington (Brookhaven). At that community, I am a member of a 75-person Climate Change Committee and a 5-person subcommittee Advocacy Group. Today I am writing as an individual speaking to you; I plan to share information with others as this building code process continues.

Through meetings here, attending DOER public hearings and talking with groups such as MCAN, I have realized that building code is a powerful tool to accelerate the Commonwealth's clean energy transformation. In order for DOER to adhere to the Next Generation Roadmap Signed by Governor Baker in March 2021 – and to make change happen in an equitable way – the opt-in specialized stretch code must:

- **Remove the fossil fuel pathways for new construction:** Retaining these pathways will disproportionately harm low-income residents throughout the state. Residents cannot afford to make complicated, expensive retrofits down the road.
- **Require building energy reporting and disclosure:** We need to know how progress on reducing building emissions is being made.
- **Require that low—carbon construction materials be used:** The provision to reduce embodied carbon must be restored in the new stretch code. In addition, Whole Building Life Cycle Analysis modeling should be required for large buildings. This will encourage smart design choices, which are urgently needed.
- **Allow municipalities to vote to have the earliest effective date for adoption of the stretch energy code:** After DOER issues the final code language on December 23, 2022, municipalities should be allowed to vote on it whenever they choose.
- **Clarify Curtainwall & Electrification Requirements:** Electrification should be required for ALL buildings, not just those with more than 50% curtainwall (defined as the entire system including framing, glazing, spandrel panels, etc.); not just for homes greater than 4,000 square feet.
- **Clarify and expand on site solar:** Panels should be used in proportion to gross square feet and to the extent of available solar access.
- **Require annual trainings on the updated building codes for CSL (construction supervisor license) holders:** At present CSL holders only need a maximum of 1 hour training on energy code every two years to renew their license.

Though I am not an engineer, or an architect, or a scientist, I find all of the discussions about building code improvements to be very fascinating and much needed. From listening to the commentaries, I know that, for my community, around 66% of emissions are due to buildings. Along with other communities, we are working on advocating for the most robust specialized code that is possible.

We are also working with others to make sure that misinformation does not get shared.. A couple of examples: 1) Propane is a clean energy option. This is false: Propane does emit carbon dioxide.

In fact it emits more CO2 than natural gas. Burning gas or propane in air-sealed buildings is a public health hazard because pollutants such as nitrous oxide and sulfur dioxide become trapped in the building. 2)An all-electric building will draw more energy off the grid. False: Because net zero buildings by virtue of their energy efficient construction, heating, appliances, and lighting consume less heat and power, and thus less energy from the grid, than fossil fuel heated buildings.

Thank you very much to DOER for the revisions to the specialized stretch energy code after the 1200 comments submitted in March,2022. The climate bill sent to the Governor is necessary, but it is insufficient for accelerating the much-needed net zero construction and renovations.

Additions/revisions such as the ones above will ensure that this process moves forward. It is my understanding that the Straw Proposal might reduce emissions by 10% by 2030. That's not enough. 2050 is just a couple of decades away. Let's use an all-electric opt-in specialized stretch code to meet our goals.

Sincerely,

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