

## Finlayson, Ian (ENE)

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**From:** Robert Banta <rhbanta@gmail.com>  
**Sent:** Wednesday, 10 August 2022 11:32 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** BUILDING CODE COMMENTS

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DOER Team,

Thank you for your efforts to update the Massachusetts building codes. I don't envy your position having to satisfy those who think global warming is a hoax and those who see it as a serious threat.

In my previously submitted written and verbal comments I suggested that the specialized code should be written as if it was already 2050, but the comment regarding battery backup made me realize that was premature. While battery backup will likely be appropriate in 2050, the additional upfront costs and ease of future installation makes battery backup inappropriate for inclusion in the 2022 specialized code. I suggest that the 2022 specialized code focus on those things that are expensive to change after the foundation is poured and the building constructed:

- All electric Zero Energy Building, with exceptions to be Net Zero for urban infill multi-family housing close to transit and similar situations. The mixed-fuel option should be removed.
- Insulation and air sealing to enable cost effective heat pump heating and cooling.
- Orientation of structure and roof design to maximize PV performance, with exceptions only when PV orientation or design is cost prohibitive, in order to reserve as much of the (future) green grid for existing buildings.

While I'd like Andover to go all in with the specialized code, I could see objections raised that the commercial side of the code would negatively impact commercial development and tax base, causing it to be voted down. To avoid that possibility, please consider allowing towns to adopt the residential and commercial codes independently.

Regards,

Bob Banta

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