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To: STRETCHCODE (ENE)
Subject: Comments on Stretch Codes

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Hello,

As a resident of Shrewsbury, I appreciate the opportunity to comment on the Updated Stretch Energy Code and the Specialized Opt-In Energy Code proposed by the DOER.

The proposed Updated Stretch Code that will be effective January 1, 2023 in the Green Communities is much appreciated because, it embodies definite progress in reducing carbon emissions. I also appreciate the DOER's appointment of the 20 person Technical Advisory Group, that will strengthen and clarify code language.

DOER deserves applause for making both the Updated and the Opt-In Stretch Codes almost 20% more energy efficient than the 2021 Base Code for residential buildings, and up to 90% better for commercial buildings.

The DOER is also to be commended for including existing buildings in both the Updated and Opt-In Zero Stretch Codes, which will expedite the reduction of existing emissions. It's excellent that curtain-wall buildings will now require renewables to offset their diminished thermal performance.

The requirement for multi-family housing greater than 12,000 square feet to meet Passive House Standards, will help meet the 2025 and 2030 emissions limits.

The DOER also deserves credit for making the Net Zero Building Definition more precise.

There are some aspects of the proposed codes that I would like to see re-visited in order to move towards a rapid and just transition to renewables on an accelerated basis. Buildings need to be as climate-resilient as possible, as soon as possible, to avoid the worst impacts of climate change:

1. The DOER needs to expand Electrification Requirements for ALL new buildings and major renovations, not just for homes greater than 4,000 square feet, since the vast majority of new homes are less than 4,000 square feet. It's necessary to implement this NOW because any home built with fossil fuel infrastructure will need to be retrofitted in the future, at an additional cost, before the end of its' useful lifetime, which is an un-necessary expense to residents.
2. The Deleted Embodied Carbon Provisions need to be restored for ALL buildings.
3. For the Opt-In Code It's important for the DOER to accelerate the Effective Dates to allow municipal adoption any time before January 1, or July 1 effective dates, anticipating possible voting in late December, the spring or fall.
4. In the revised Opt-In Code, language needs to be clarification about On-Site Solar. It's important for the DOER to expand on-site solar generation for ALL buildings not just those heated by fossil fuels. DOER needs to require on-site solar panels in proportion to gross square feet, to the extent of available solar access.

5. DOER needs to clarify Curtain-wall area as the entire system, including the framing, glazing and spandrel panels and to require electrification for buildings with 30+% (not 50+%) Curtain-wall area.
6. DOER needs to show how the building sector is going to meet the 2030 Building Sector Limits. The office of EEA recently finalized legally mandated 2025 and 2030 emissions limits so we need DOER to model progress towards these goals under various growth and opt-in assumptions.
7. We need DOER to update Cost Studies to reflect the higher current gas and electricity prices, which are expected to be 30% higher, in part because of the global impact of the war in Ukraine. The cost premiums to retrofit fossil fuel heated homes also need to be factored into the calculations.
8. A data-driven approach is essential to evaluate how our buildings perform over time to a true net-zero standard. It's important to use Whole Life Cycle Assessment (LCA) to understand energy use and other environmental impacts associated with all life cycle phases of a building. This type of analysis looks at Embodied Carbon and seeks to use materials and practices that lower carbon emissions over the life of a building.

As a resident of the Commonwealth I look to the DOER to implement policies that will protect people and the environment from the most devastating impacts of climate change. The points made here are within your power to effect, and the time frame needed for the DOER to act is urgent, so that we can all have a livable future. These changes to the Stretch Code are a powerful tool to get us there.

As a resident of Shrewsbury, I have been part of a volunteer group called Tipping Point 01545 for the last year and a half. We work with Town Government to support its' commitment to reduce greenhouse gas emissions in its' public buildings and properties. In part because of our efforts, the Town is in the process of developing a Climate Action and Resiliency Plan. Among other things, the Plan will create a pathway for the Town to save energy by retrofitting existing buildings and designing new structures to use less energy and more renewable resources. Strengthening the Stretch Codes is important to me and the members of our group because it will allow the Town to implement strategies to reduce carbon emissions that are not now permitted by law. We need to move ahead at a faster pace because the impacts of climate change are already being felt and the pace of climate change is accelerating. Please make the above changes because the building code is so important for the climate and also for the health of communities in all of the Commonwealth.

Thank you.

Best regards,
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