

## Finlayson, Ian (ENE)

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**From:** Tom Brown <tom@brown.name>  
**Sent:** Monday, 8 August 2022 9:21 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** Opt-in Stretch code comments

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Hello,

I am writing to support the comments and proposals of MCAN in connection with the upcoming implementation of new standards for the Mass opt-in stretch code. Of particular importance to me is the application of the stretch code to all relevant renovations of existing buildings (thank you for the progress so far on that) and dramatically expanding electrification requirements. More generally, we must act as aggressively as we can to make our city carbon-neutral if we intend to pass a habitable planet on to our children.

Specifically, I urge you to make the following changes to the opt-in code:

- 1. Expand Electrification Requirements:** Make electrification a requirement not just for buildings with 50% curtainwall, and not just for homes greater than 4,000 SF, but all new and substantially renovated homes and other buildings. We know that any building built today with fossil fuels will need to be retrofitted for a higher cost in the future; instead, we should be electrifying today. Additionally, if there is a threshold that specifically applies only to curtainwall, that threshold should be lowered to 30% (not 50%) curtainwall area, and curtainwall area should be defined as the entire system including framing, glazing and spandrel panels.
- 2. Restore Deleted Embodied Carbon Provisions:** For all buildings, require cost effective low carbon materials, and for larger buildings, require Whole Building Life Cycle Analysis reporting so that the true cost of the building is known.
- 3. Accelerate Effective Dates:** Allow municipal adoption any time before Jan. 1st or July 1st anticipating that voting could happen in late December, spring or fall.
- 4. Clarify and Expand On-Site Solar Generation:** For all buildings, not just those heated with fossil fuels, require on-site solar panels in proportion to gross square feet based on the extent of available solar access.
- 5. Pair Thermal Energy Demand Intensity (TEDI) Limits with Energy Use Intensity (EUI) Limits by Building Type:** Set EUI limits at least equal to those in the 2021 Base Code Appendix ("Zero Code") to gain overall energy efficiency.
- 6. Show How 2030 Building Sector Limits are Met:** The Executive Office of Energy and Environmental affairs (EEA) finalized mandated 2025 and 2030 emission limits and DOER should model progress toward these goals under growth and opt-in assumptions.
- 7. Correct Cost Studies and Minimize Life Cycle Costs:** Cost studies should reflect current gas and electricity prices AND also the future cost of retrofitting fossil fuel heated buildings should be accounted for.

Thank you for your work on these imperative issues.

Tom Brown  
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Sent from my iPad