

## Finlayson, Ian (ENE)

---

**From:** Carolyn Britt <cjbritt@comcast.net>  
**Sent:** Monday, 25 July 2022 1:48 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.

Department of Energy Resources,

**I have served on the Ipswich Planning Board for about the last 6 years**, after retirement from a career in community development and planning for the Commonwealth, the City of Lowell, and a number of other communities in the Commonwealth and in New England as a consultant. My time on the Planning Board as a volunteer has been the most challenging.

**As a Planning Board member, I have watched a parade of architects and developers who want to simply do what they have always done regarding the size of buildings, type of buildings, utility systems, and building construction.**

Questions about electrification, construction orientation, solar, and full avoidance of fossil fuels have fallen on deaf ears. Recently, a couple developers have developed fully electric, fossil free residential properties. Ipswich has its own Electric Light Department that offered significant rebates for electrification, but were not taken up on their offer.

Ipswich has done as much as it can using zoning, regulations, and guidance to encourage developers to develop responsibly.

**Only requirements in the building code will get us where we need to go. Below are my comments on the draft building code options.**

1. **The Opt-In Stretch Code is a good start, but it should be mandatory for all communities, and it should be a true net zero code.** We have no time to waste. Without it being mandatory, many new buildings will be built with fossil fuels serving them, and these will have to be replaced in the next decade or so. It makes no sense, particularly for low and moderate income residents.
2. **Even the Opt-in Code allows some fossil fuel use** – this continues use of fossil fuels with their significant health risks as well as GHG emissions. Any continued use of fossil fuels should be removed from the Opt-In code.
3. **In the absence of a mandatory Opt-in Code, some “carrots or sticks” should be developed to greatly enhance the likelihood of any community, but specifically a Green Community, to adopt the Opt-in Code.**

4. The Opt-in code should also be able to allow **the state to meet the goals of 2030 and 2050 emissions targets**. This cannot be done with an Opt-in code that allows fossil fuels and is not mandatory!
5. **Guidance on embodied carbon** should be returned to the language of both the Stretch and Opt-In Stretch Codes.
6. **All building should be required to incorporate roof-top or on-site solar** if at all possible, with orientation and design of the building, reducing conflicts on the roof. Municipalities should be required to allow reduction of development on a site to achieve appropriate orientation.
7. **Smaller home and commercial building renovations** should trigger building code requirements for upgrades to electrification.
8. **Curtain wall buildings** that exceed the window area of other style buildings (about 30%) should be required to be fully electric.
9. **The dates of adoption are awkward and time-consuming**. Ipswich can not adopt the Opt-in Code until spring town meeting in mid-May. It would then not take effect until the start of 2024 as we could not meet the 6 month window to implement. Ipswich already has a long time period from the approval of the warrant until town meeting – 2.5 months. Developers can be notified earlier that we plan to put this before the voters. It is better to have a shorter period where the building code is unknown than a full 6 months.

**As we are all well aware, when not being influenced by people with special interests, this is the decade, even just the next couple years, where very significant progress must be made. The Commonwealth and the earth do not have any time to waste trying to appease people with financial interests. At this point, any one in real estate has just had the best couple years of their careers. We need to move forward for the benefit of all.**

Thank you for your consideration.

Carolyn Britt, AICP

Member, Ipswich Planning Board and Ipswich Climate Resiliency Committee