

Finlayson, Ian (ENE)

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Sent: Thursday, 28 July 2022 2:24 PM
To: STRETCHCODE (ENE)
Subject: BUILDING CODE COMMENTS

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Dear DOER Members:

The revisions made to the proposed stretch code in response to earlier public comments are commendable. However, I am writing to ask for more, because it is essential to: a) combat the worst effects of climate change; b) reduce public health risks; c) protect future utility bills from inflation by the costs of obsolete gas infrastructure, costs that are likely to fall most heavily on less affluent communities; d) minimize future costs of retrofitting relatively new buildings that use fossil fuels; and e) meet the legally binding Massachusetts 2030 emissions reduction goal for the building sector.

I strongly urge the DOER to eliminate the fossil fuel pathway in the current draft of the specialized opt-in code, and to provide stronger requirements for *all electric low carbon buildings* in the stretch code. More specifically:

1. Make electrification a requirement for ALL new buildings and major renovations. Any building built today that uses fossil fuels will need to be retrofitted at greater cost and complexity before the end of its useful life.
2. Restore the deleted embodied carbon provisions, requiring certain cost-effective low-carbon for all buildings. For larger buildings, additionally require a Whole Building Life Cycle Analysis.
3. Require electrification for buildings with 30+% (not 50+%) curtainwall area, defined as as the entire system including framing, glazing, spandrel panels.
4. Show how 2030 building sector limits are met. EEA recently finalized legally mandated 2025 and 2030 emissions limits. Model progress toward these goals.
5. Correct cost studies to reflect current gas and electricity prices and to add significant cost premiums for retrofitting fossil fuel heated buildings.
6. Allow municipal adoption sooner -- any time before Jan 1st or July 1st, anticipating possible voting in late December (special session), Spring, or Fall.

Thank you for your attention to these requests.

Sincerely,

Leslie A Zebrowitz

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