



MASSACHUSETTS FARM BUREAU FEDERATION, INC.

"The Voice of Agriculture"

www.MFBF.net

RECEIVED

JUN 24 2016

DEPARTMENT OF PUBLIC SAFETY

June 21, 2016

To: The State Board of Building Regulations and Standards
From: The Massachusetts Farm Bureau Federation
RE: Revisions to Building Code Chapters 13 and 51

The Massachusetts Farm Bureau Federation is the largest farming organization in the Commonwealth with approximately 6,000 member families. It is on behalf of these members that we would like to offer the input on the proposed revisions to Chapters 13 and 51 of the Building Code.

We appreciate and support the Board's effort to promote energy efficiency, and in the effort towards consistency through adoption of international code standards. However agricultural buildings are often constructed and utilized differently than residential or commercial buildings. In some cases, these differences warrant a different regulatory approach and code provisions. It should be noted that changes were made to the code several years back acknowledging this by designating many agricultural building as Group U buildings.

Relative to the proposed code changes, we would ask the Board to consider the following when considering requirements for solar arrays on roofs, mandated hookups for electric vehicles, and energy efficiency requirements:

- Please note that many agricultural buildings, particularly indoor riding rings, utilize large numbers of skylights or translucent roofing material to allow natural light into the building. Requirements to provide for areas of future solar arrays should not interfere with these practices which also save energy.
- It should be made clear that greenhouses are exempt from the requirement for roof areas being made available for solar arrays.
- Many agricultural buildings are unheated, or have only a portion of the building (such as an office) heated. It should be made clear that energy efficiency requirements are not applicable to unheated buildings or portions of buildings which are unheated.
- The requirement for buildings to install hookups for electric vehicles may add significant costs to agricultural building which see only seasonal use. Our suggestion is to be clear to exempt Group U buildings from this requirement.

If Farm Bureau can be of assistance, please do not hesitate to contact us.

Contact
Brad Mitchell