

Finlayson, Ian (ENE)

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Sent: Friday, 12 August 2022 1:58 PM
To: STRETCHCODE (ENE)
Subject: BUILDING CODE COMMENTS

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Dear Massachusetts DOER:

I have written before – as a resident, and a city councillor in Cambridge. The entire City Council is on record as strongly supporting a true net zero stretch code. Which the draft code you released is NOT. Cambridge's Climate Crisis Working Group, which assembled a group of climate experts to assess how the city can be more effective, discussed the upcoming code and was unanimous in wanting a true net zero code option. And agreed that the draft was deeply disappointing. The CCWG, which I chaired, saw the updated code as necessary for us to meet our climate goals. Not a nice to have – a must have.

The state law requires a reduction of emission pollution of 50% over 1990 levels and without immediate impactful effective action we will not achieve that required reduction. The net zero energy stretch code is a key part of the plan necessary for the Commonwealth to have any hope of being an environmental leader. The current draft is not only inadequate – it is wrong and deceptive.

The code must include a real net zero stretch code option – one that is fully electrified with no exceptions. The "specialized opt in code" - the code that was supposed to require zero emissions new construction - does not require zero emissions. Two compliance paths are included. Only one is net zero - fully electrified new construction. The other allows building to include fossil fuel [FF] equipment for heating, hot water and other purposes. In what kind of honest assessment are buildings that emit emission pollution called "net zero"? That is hypocrisy at best, and deception to its core. Massachusetts is better than that.

No scenario that people have run show that we can meet the moment of averting climate catastrophe without ceasing the addition of new FF infrastructure. We must not only STOP adding FF, we have to decarbonize our existing buildings. Reaching our goals – as a city, a state, a country and a world – is already immensely challenging. Where we are now. Why would we allow any new FF infrastructure when the technology is here, cost-competitive and effective? Not to mention the lessening of risks inherent in FF running throughout our cities. Literally at risk of blowing up.

Please do the right thing and do what was requested: promulgate a true net zero energy stretch code. The current one is wrong for Massachusetts.

Sincerely,

Patty Nolan

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