



To: MA Department of Energy Resources
Maggie McCarey, Director, Energy Efficiency Division
Date: August 11, 2022
RE: Building Code Comments

The undersigned members of the Newton City Council urge you to strengthen both the draft updates to the Stretch Code and, in particular, the new opt-in Specialized Stretch Energy code. Although the drafts are much improved from the current code, neither go far enough to address what the building industry can and should do to ensure that the next generation of buildings do not further exacerbate the climate crisis. And - the building industry already has the talent and technologies needed to achieve compliance.

Our City of Newton has been advancing its municipal building performance standards dramatically over the last decade. New municipal buildings are now all electric for primary systems with high performing building envelopes. By listening to and working with many expert building professionals in our community, our City Leaders have learned how we can achieve buildings that perform to the highest standards, and why this is the wise course. Higher standards than what the drafts propose are not only feasible, they add minimal cost, and pay dividends in terms of reducing energy demand, increasing longevity, improving health and quality of life for building occupants. For several years our Council Orders for new development required feasibility assessments of more advanced building systems which developers then incorporated into their projects voluntarily, once discovering that the investment makes good sense. Our special permit petitions now often meet Passive House standards, with no fossil fuels except for emergency or stand-by power.

We call upon you to give us the tools we need to require higher standards for all new construction and major renovations, to give us the opportunity to require what we now understand leads to more durable, energy efficient and lower carbon buildings.

To this end, our specific suggestions include:

- Eliminate pathways that allow for fossil fuel combustion (exempting emergency generation). A true net zero building does not allow for on-site combustion of fossil fuels. Electrical pre-wiring is insufficient!
- Restore provisions to minimize embodied carbon in construction. Poor choices of construction materials can weaken and overwhelm gains in reducing operational energy. Embodied carbon is being measured and reduced in new construction in Newton.

- Widen the stretch code coverage to include renovations: to as little as 1,000 sf residential and as little as 20,000 sf commercial.

Please give Massachusetts' communities the tools we need to require for all building projects what we have already been successful in achieving for many projects in Newton.

Thank you for the opportunity to weigh in on the important work DOER is doing to address the climate crisis.

Sincerely,

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