



City of Quincy

Department of Public Buildings

Thomas P. Koch
Mayor

Paul J. Hines, JD
Commissioner

August 2, 2022

Ian Finlayson
Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Via: stretchcode@mass.gov

Dear Mr. Finlayson,

I want to thank DOER for listening to the thousands of experts and concerned citizens that expressed their ideas about the February stretch code straw proposals, particularly the “new specialized opt-in stretch code” (NSOISC). I am the City of Quincy’s Energy & Sustainability Director. Here we experience the impacts of climate change firsthand primarily as elongated, more frequent and more severe heat waves, record-breaking snowfall that shutdown the Red Line service for a month, and flooding during coastal storm surges that resulted in waist-high water in our streets submerging cars, stranding residents, and causing property damage. Unfortunately, these kinds of extreme weather events are in our future too, but things could get even worse.

Quincy is experiencing a prolonged and unabated building boom, so the stretch code, and should our City Council adopt it, the NSOISC, are vitally important tools to set standards for Quincy’s future energy use and greenhouse gas emissions. I am really pleased to see changes since the straw proposals, that expand the relevance of the stretch code and NSOISC to existing buildings’ renovations. I also want to thank DOER for changes that now require curtainwall buildings to include renewables, and for changes that now require larger multifamily buildings to meet Passive House standards.

I want to take this opportunity, though, to innumerate a few key areas where I strongly recommend DOER make additional changes to the proposed NSOISC.

Curtainwall buildings have diminished thermal energy performance due to their glass exteriors. The NSOISC now requires electrification for buildings with at least 50% curtainwall construction. Instead, DOER should lower the threshold for curtainwall buildings so that buildings with at least 30% curtainwall area are required to be electric-only.

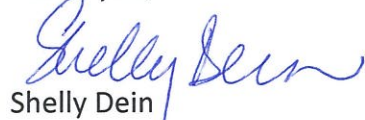
For Massachusetts to meet the legally-mandated net zero emissions requirement in 2050, most buildings will need to be fossil-fuel free. Electrification should be a requirement for all newly constructed and significantly renovated buildings. Any building built now can be comfortably and affordably conditioned with heat pumps, without fossil fuels. The NSOISC’s current approach still

allows buildings to be constructed with fossil fuels. In the foreseeable future, these new fossil-fueled buildings will need their heating systems to be replaced, which is costly, impractical, and complex. I encourage DOER to amend the new proposed code and not set these buildings up for future failure.

I also encourage DOER to revise the NSOISC so all new buildings are required to install solar arrays in proportion to their size to the extent of their solar access. All buildings use electricity, and increasingly, our vehicles do too. To lessen our collective impact on our electric grid, we need to increase the amount of renewable energy generated. As currently proposed, only fossil-fuel heated buildings will be required to install solar. While that is a good step, the requirement should go further.

Again, I want to thank you and others at DOER for your and their good work. We all understand the limited timeline we have to slow climate change to prevent our planet from becoming unlivable. I encourage you to consider these suggestions and those from others. These changes would enable communities that choose to opt in to the new stretch code option, to show the rest of Massachusetts that true net zero construction and decarbonized operations can be done, practically and affordably.

Thank you,



Shelly Dein
Energy & Sustainability Director
City of Quincy, MA