
From: [Redacted]
Sent: Monday, June 06, 2016 12:01 PM
To: [Redacted]
Subject: Fwd: We support New Revised Stretch Code

Department of Public Safety
Arlington Place -- ROOM 1501
Boston, MA 02108

Sent from my iPhone. Please excuse any errors and/or typos.

Begin forwarded message:

Date: June 6, 2016 at 11:32:44 AM EDT

Subject: We support New Revised Stretch Code

City of Newton

Newton Citizens Commission on Energy

Setti D. Warren
Mayor

Matthew A. Beaton
Secretary, Executive Office of Energy and Environmental Affairs

100 Cambridge Street, Suite 900
Boston, MA 02114

Daniel Bennett, Secretary
Executive Office of Public Safety and Security
One Ashburton Place, Suite 2133
Boston, MA 02108

Mr. Judith Judson, Commissioner
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Richard Crowley, Chair
Board of Building Regulations and Standards
Mass. Dept. of Public Safety
One Ashburton Place, Room 1301
Boston, MA 02108

Honorable Secretary Beaton, Secretary Bennett, Commissioner Judson, and Chairman Crowley,

As a leader of cities and towns across the Commonwealth who have all taken up the challenge to become Green Communities, we urge you to continue the excellent progress you have made thus far in advanced building codes by revising the Stretch Energy Code toward higher performance standards.

In Newton, the Stretch Energy Code had a dramatic impact on energy performance of new residential construction without significantly inconveniencing or financially burdening the construction industry and real estate community. With your help, we can continue this trend. It is well known that the residential sector makes a very large relative contribution to the greenhouse emissions from most cities and towns, including Newton, and this is where our great opportunities for energy conservation are.

We recommend the following three-tiered standard under the New Stretch Energy Code:

- HERS rating of 40 for homes that are 3500 s.f. or larger
- HERS rating of 45 for homes in the 2000 – 3500 s.f. range
- HERS rating of 55 for houses smaller than 2000 s.f.

The Citizens' Commission on Energy in Newton examined all the newly constructed private residences in Newton (mostly single family houses) since the Stretch Energy Code was adopted here. Not a single residence exceeded (i.e., performed more poorly than) the HERS rating allowed under the Stretch Energy Code (65 for houses that are 3000 s.f. or greater, and 70 for houses smaller than that). In fact, *75% of the ratings in new construction were below 60, with a large proportion of those in the 40 to 50 range.* During that same period of time the City has not

received a single complaint from builders that the Stretch Energy Code standard was unattainable or burdensome. In other words, the construction sector in the Commonwealth has shown us that they readily have the capacity and know-how to build homes that are *more efficient than what the current Stretch Energy Code requires*. We should seize on this opportunity and continue reaching toward better performance and greater challenges.

We acknowledge that slightly higher construction costs under the new Stretch Energy Code may in some cases impose financial burden on occupants of homes built for lower income families. For that reason, we propose three different HERS standards: for smaller, medium and larger size houses, with the most ambitious HERS rating of 40 intended for the largest houses. This stratification of HERS standard according to the house size is fair on two counts: energy consumption to heat, cool and power a house increases with size, and the more stringent HERS standard will partially offset this increased energy intensity; owners of larger homes are in a much stronger financial position to invest in building energy efficiency. Furthermore, widespread adoption of building practices that produce 40 and 45 HERS ratings will over time reduce the cost premium on such construction and make it affordable for families in all income brackets. We have already seen this happen as building products manufacturers have developed construction products and assembly methods that consistently outperform Stretch Energy Code requirements.

The more stringent HERS 40 threshold for new homes over 3500 s.f. reflects our study of new home construction in Newton. Like many communities, most of the City's newly built homes are a result of so-called teardowns: older and smaller houses are demolished and replaced with much larger – often two or three-fold larger -- homes, which use more energy than their predecessor, even with the energy efficiency improvements under the 2010 Stretch Energy Code. The higher efficiency standard will help counteract this trend.

Since the adoption three years ago of the International Energy Conservation Code (IECC) 2009 by the Board of Building Regulations and Standards (BBRS), the Stretch Energy Code currently in use has become outdated. With the new version of the base Massachusetts Building Code 9th ed. energy code based on the IECC 2015 energy code, the goal of having the alternative, more ambitious energy code is no longer being met. Furthermore, the recent ruling by the Supreme Judicial Court that Massachusetts is not in compliance with the targets set by the 2008 Global Warming Solutions Act adds great urgency to finding ways to reduce greenhouse gas emissions in the Commonwealth. *Boston Globe, David Abel, May 18, 2016, "SJC Rules Mass. Failed to Issue Proper Regulations to Cut Emissions"* A revised Stretch Energy Code must be part of the plan to respond to the SJC ruling and protect citizens from the dangers posed by climate change.

We urge you and your Administration to revise the Stretch Energy Code, and make it once again more ambitious than the new IECC code.

The process of adopting the original Stretch Energy Code was not easy for all stakeholders. The strong and understandable resistance from some builders and real estate interests concerned about its potential financial impacts clashed with those who saw a more stringent energy code option as an opportunity to save homeowners money, advance building technologies, and make the Commonwealth the national leader in energy efficiency practice. Efforts to revise the Stretch Energy Code as recommended here will not end the debate, but given our previous experience with the adoption of the original Stretch Energy Code and the enormous success of Stretch Energy Code in the market place, we urge you to include our proposals for an updated Stretch Energy Code and encourage its adoption by the BBRS.

Thank you for your consideration.

Halina S. Brown, Vice-Chair, and Eric Olson, Chair, *Newton Citizens Commission on Energy*

Marcia Cooper, President, *Green Newton*

Jonathan Kantar, Chair, *High Performance Building Coalition of Newton*