

## Finlayson, Ian (ENE)

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**From:** Marcia Cooper <marcia@greennewton.org>  
**Sent:** Wednesday, 10 August 2022 12:42 PM  
**To:** STRETCHCODE (ENE)  
**Subject:** BUILDING CODE COMMENTS

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August 8, 2022

Department of Energy Resources (DOER)  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
Email: [stretchcode@mass.gov](mailto:stretchcode@mass.gov)

Re: **Building Code Comments**

Dear Commissioner Woodcock, Secretary Card, and Secretary Kennealy,

I am writing to support DOER to develop a specialized stretch energy code that ensures the Commonwealth can meet building sector emissions targets while also making buildings a core climate mitigator and protector of our health.

First, I want to express gratitude to DOER for the revisions that were made to the specialized stretch energy code after 1200 comments were submitted in March on the straw proposal. Thank you for listening to the Commonwealth residents by making several key improvements in the revised code language which include:

- incorporating the industry-standard definition of net zero building and the optional pathway found in 2021 Base Code Appendix, also known as the Zero Code, advanced by AIA 2030 and endorsed by the national AIA.
- requiring multi-family projects greater than 12,000 square feet to meet Passive House standards.
- forming a Technical Advisory Committee with expertise in building codes and climate resilient buildings.

Unfortunately, the climate bill waiting Governor Baker's signature, is insufficient to accelerate the scale of net zero construction and renovations. A statewide opt-in net zero building code is urgently needed to transform buildings from polluters to protectors of our health and the climate. **A robust opt-in specialized stretch code is needed to electrify ALL buildings, new construction and renovations. My recommendations are as follows.**

**Eliminate all fossil fuel pathways for new construction and renovations.**

- This will lead to a reduction of greenhouse gas emissions in all of our communities

**Expand electrification requirements.**

- Make electrification a requirement for ALL new buildings and major renovations
- Any building built today with fossil fuels will need to be retrofitted at greater cost and complexity before the end of its useful life, wasting money, burdening our energy infrastructure and challenging our emissions reductions goals.

### **Restore Deleted Embodied Carbon Provisions**

- Set us on a path for a more rapid reduction of embodied carbon emissions within the next 10 years.
- Require ALL buildings (not just those with a certain amount of curtainwall) to meet prescriptive specifications for low-carbon construction materials.
- For larger buildings, additionally require Whole Building Life Cycle Analysis.

### **Accelerate Effective Dates**

- Allow municipal adoption by a vote that takes place any time before the Jan 1<sup>st</sup> or July 1<sup>st</sup> effective dates.
- Drop the six-month minimum lead time for which there is legal requirement.
- DOER plans to issue final code language on December 23, 2022. Municipalities should be free to vote whenever they choose and to have the soonest effective date.

### **Clarify and Expand On-Site Solar Generation**

- For all buildings, require on-site solar panels in proportion to gross square feet to the extent of available solar access.

### **Clarify Curtainwall & Electrification Requirements**

- Define curtainwall area as the entire system including framing, glazing, spandrel panels. Set curtainwall performance criteria such as a U value for the entire system.
- Require electrification for ALL buildings, not just those with more than 50% curtainwall.

### **Show How 2030 Building Sector Limits Are Met**

- DOER and EEA should publicly demonstrate through scenario modeling how 2030 building sector emissions limits can be met. Based on DOER's numbers, it seems the Straw Proposal might reduce emissions by 10% by 2030 and that is not enough. DOER must show the public and the legislature what it will take to meet 2030 emissions goals.
- All future growth should be net zero and around 100,000 existing buildings must be electrified each year.

### **Please do not accept misinformation that has been perpetuated in in-person DOER meetings .**

- Fossil fuels are NOT needed to ensure a smooth transition to all electric buildings.
- All-electric buildings will NOT draw more energy off the grid. You must know that a true net zero building is very energy efficient, all-electric with renewable energy generated on-site or purchased off-site. In reality, net zero buildings use less energy from the grid compared to buildings powered with fossil fuels.
- Propane is NOT a clean energy option, since it does emit carbon dioxide (please see [https://www.eia.gov/environment/emissions/co2\\_vol\\_mass.php](https://www.eia.gov/environment/emissions/co2_vol_mass.php)) It has no technical equality relative to heat pumps in net zero buildings.

**The people of Massachusetts are really counting on you to enact the most beneficial opt-in specialized stretch code to regulate and electrify ALL buildings, new construction and renovations, available to ALL communities.**

**In closing, I want to emphasize that we cannot afford to disregard the urgency for transforming our buildings from polluters to protectors of our health and the climate.**

Sincerely,

Marcia Cooper, President of Green Newton

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