



March 9, 2022

Delivered Via Email To: stretchcode@mass.gov

Dear Massachusetts Department of Energy Resources:

Thank you for the opportunity to provide comments regarding the Straw Proposal for the Stretch Code update and New Specialized Stretch Code. The American Chemistry Council (ACC) and its members applaud Massachusetts for its leadership and supports the development of stretch codes that save operational energy and carbon.

ACC represents more than 190 leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. The business of chemistry is a \$486 billion enterprise and a key element of the nation's economy. Chemistry companies are among the largest investors in research and development, investing \$10 billion in 2020.

Within Massachusetts, the chemical industry produces and ships \$1.21 billion in products to customers around the world. The chemical industry in Massachusetts provides more than 6,114 direct jobs plus an additional 6,703 indirect jobs and an additional 12,583 jobs in plastics and rubber products. Further, it invests approximately \$446 million to build and update equipment and facilities.

ACC has extensive knowledge regarding building code development. ACC is a partner in building science research, including projects with the Home Innovation Research Labs and ICF International. ACC representatives serve on the ICC, ASHRAE, ASTM, and other code and standard setting bodies.

ACC Supports the Improvements to Operational Energy and Carbon Efficiency

The chemical industry supports improvements to our building sectors operational energy and carbon footprint. Such improvements make housing more affordable, our communities more resilient, and energy security more attainable.

We support the updated air leakage rate to a level that is proven and consistent with those that have been long recognized by the Army Corp of Engineers. We also support the updated improved Envelope UA proposal for regular walls. The building envelope is key to long lasting energy performance.

ACC Does Not Support Currently Proposed Additional Requirements to Accommodate Curtain Walls

ACC does not support energy efficiency trade-offs for options that do not provide equivalent energy savings. As stated above the building envelope is key to long lasting energy performance. An inefficient envelope means that energy will be wasted for the life of the building. Although the options proposed are intended to save carbon up front they will not save energy and will only save a fraction of the carbon lost to an inefficient envelope and subsequent HVAC loads.

ACC recommends looking to other Additional Energy Efficiency Credit Requirements in Section C406.1 of the 2021 International Energy Conservation Code to better equivalent efficiency alternatives.

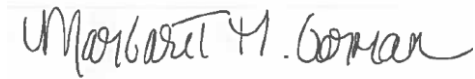


Many Technical Resources Are Available to Help

In addition to the code and manufacturers installation instructions, various third-party resources are available to support code and stretch code compliance with helpful guidance on performance and installation. For example, ACC's Foam Sheathing Committee supports the development of technical and practical information for designers, installers, and code officials on www.continuousinsulation.org, and ACC's Spray Foam Coalition has excellent resources at <https://polyurethane.americanchemistry.com/polyurethanes/Spray-Foam-Coalition/>.

Thank you for the opportunity to offer our comments. For any questions, please do not hesitate to contact me at (518) 432-7835 or via email at Margaret_Gorman@americanchemistry.com. ACC, its member companies and our employees thank you in advance for considering our views.

Sincerely,



Margaret Gorman
Senior Director, Northeast Region
American Chemistry Council

