

From: [REDACTED]noreply+faedf28b4145f9ff@formstack.com>
Sent: Wednesday, February 03, 2016 9:24 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 02/03/16 9:23 AM

Name (optional):: Mary Kraus, AIA, LEED BD+C

Company/Organization (if applicable) (optional):: Kraus-Fitch Architects Inc

Address (optional):: [REDACTED]

Primary Phone (optional):: [REDACTED]

Email (optional):: [REDACTED]

CMR Number (If known): : 780 CMR, Appendix 115.AA - Draft of Update

General Regulatory Themes:: Building Codes/Accessibility Standards

Please list the Agency or Agencies affiliated with this regulation:: Board of Building Regulations and Standards

Describe the regulatory issue or observation:: Updated Stretch Code: The proposed draft is much too weak.

Suggestions for improvements to the regulation:: As an architect in the field, I see how the original Stretch Code has allowed Massachusetts to improve the building stock and make real steps towards a sustainable future. We need to keep this momentum with an updated Stretch Code that goes further. As the base codes improve, so should the Stretch Code - otherwise the Stretch Code becomes meaningless, as the base code catches up to it. A particular concern with the draft of the updated stretch code is that it reduces its scope to buildings over 100,000 SF - that leaves out the majority of buildings being constructed, not to mention that renovations are a critical area that must be addressed. Existing buildings account for a large percent of energy use, and need to be addressed in the Stretch Code as well.

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Suite 300
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From: [REDACTED]noreply+5241b36323293357@formstack.com>
Sent: Wednesday, February 03, 2016 10:09 AM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 02/03/16 10:09 AM

Name (optional):: Mark Price
Company/Organization (if applicable) (optional):: Price Sustainability Associates, Inc.
Address (optional):: [REDACTED]
Primary Phone (optional):: [REDACTED]
Email (optional):: [REDACTED]
CMR Number (If known): : 780, appendix AA
General Regulatory Themes:: Building Codes/Accessibility Standards

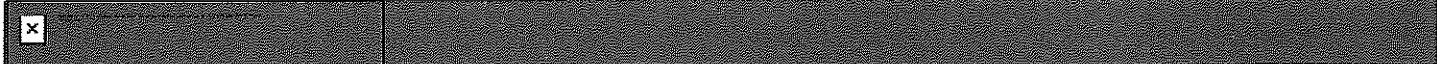
Please list the Agency or Agencies affiliated with this regulation::

Describe the regulatory issue or observation:: The new "Stretch Energy Code" or "Stretch Code" proposal does not require an aggressive enough energy standard and is embarrassingly weak as it only points to current IECC 2015 - it isn't really a stretch at all. Massachusetts set a new national standard for voluntary energy codes with the first Stretch Code and this next update should follow that precedent.

Suggestions for improvements to the regulation:: The first (current) Stretch Code required a substantial improvement over 'base' code, 30-35% better on the Residential side, 20% better on the Commercial side, and included the bulk of new building in the state, the new proposal falls way short of that, and the Comm side exempts building under 100,000 sf, abandoning a significant segment of new buildings desperately in need of a better energy standard. A re-write of this proposal consistent with the current stretch code is what is needed, not the 'watered down', neutered version currently proposed.

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From: [redacted] <[redacted]@formstack.com>
Sent: Wednesday, February 03, 2016 1:58 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform



Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 02/03/16 1:57 PM

Name (optional):: Hank Keating

Company/Organization (if applicable) (optional)::

Address (optional):: [redacted]

Primary Phone (optional)::

Email (optional):: [redacted]

CMR Number (If known): :

General Regulatory Themes:: Building Codes/Accessibility Standards

Please list the Agency or Agencies affiliated with this regulation:: BBRS

Describe the regulatory issue or observation:: The BBRS is a year or more behind schedule in updating the Stretch Code
The most recent draft revisions are very weak and do not advance the State's leadership in energy conservation

Suggestions for improvements to the regulation:: Incorporate the suggestions from the Sierra Club and NEEP to strebghten the code

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From: [REDACTED]noreply+9745d3d590520d58@formstack.com>
Sent: Monday, February 08, 2016 12:18 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 02/08/16 12:18 PM

Name (optional):: Barbara Burr
Company/Organization (if applicable) (optional):: Burr Brothers Boats
Address (optional):: [REDACTED]
Primary Phone (optional)::
Email (optional):: [REDACTED]
CMR Number (if known): : Hoist Licensing
General Regulatory Themes:: Licensing and Permitting
Please list the Agency or Agencies affiliated with this regulation:: Department of Public Safety

Describe the regulatory issue or observation::

The Department of Public Safety routinely requires a DOT card to get a CDL license, (commercial Drivers license), Hoist license, and even forklift operator license.

A DOT card is a Federal credential issued by the Department of Transportation. It's purpose is to prevent accidents by identifying high risk "intrastate" drivers. It was never designed to be used they way DPS is using it. It was never designed to arbitrarily stop people from earning a living.

A carpenter with 18 years of accident free forklift operation with us, was denied because he has a cataract. A man who has a CDL, and hoist license, who is one of our most skilled and careful workers, and who has never had an accident in the 20 years he has worked for us, is denied because he has a heart abnormality. Our yard superintendent, with us for 38 years, is unable to get a DOT card, and I do not know why. I do know, that if he is without a license, he cannot fully participate in training.

Arguably, cataracts, diabetes, heart abnormalities, and other common ailments can pose a serious threat to a person driving an 18 wheeler, alone, overnight, in bad weather, across state lines. But I have lost three excellent operators, one of whom may soon be unemployed if he can't drive equipment.

This is not a new requirement, however, the application is new. The DOT card used to be easy to get. Now, medical staff is receiving training, and fine print is being read.

Suggestions for improvements to the regulation::

BEST - Only require DOT cards for INTRASTATE travel, as the form indicates.

ACCEPTABLE - Clarify exemptions, and exempt anyone working in a private business, and not traveling on public property. Exempt anyone working in daylight hours.

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From: [REDACTED]noreply+b7e52c30079c6480@formstack.com>
Sent: Monday, February 15, 2016 6:15 PM
To: RegReform (ANF)
Subject: A Clearer Code: Regulatory Reform

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 02/15/16 6:14 PM

Name (optional):: Michael Duclos

Company/Organization (if applicable) (optional):: DEAP Energy Group, LLC

Address (optional):: [REDACTED]

Primary Phone (optional):: [REDACTED]

Email (optional):: [REDACTED]

CMR Number (If known): : 780 CMR - Stretch Code

General Regulatory Themes:: Building Codes/Accessibility Standards

Please list the Agency or Agencies affiliated with this regulation:: BBRS

Describe the regulatory issue or observation:: Stretch code has changed the way we build buildings, using feedback from energy modeling to make trade-offs that provide flexibility for architects and builders, as well as important feedback on the energy use implications of insulation, air sealing and mechanicals design decisions. Producing more clean energy will address only part of the climate change problem, reducing energy use in new buildings which will exist for 50-100 years into the future is inexpensive to do with a new building. As we learned from the Deep Energy Retrofit pilot, it is very expensive to 'fix' an existing building to use less energy.

Suggestions for improvements to the regulation:: Since the introduction of IECC 2012 with MA amendments, the Stretch Code is considerably less of a 'stretch' and should be updated as soon as possible to surpass the energy use of IECC 2015 performance levels. I believe we should adopt IECC 2015 as soon as possible as the 'base code' (with MA amendments) since we recognize the high percentage of national energy use that is in buildings, the longevity of a new building and it's environmental impact in terms of annual energy use. I use computer modeling to help optimize building enclosures, and believe we should go beyond these codes to use techniques we have learned in designing Passive Houses to make new homes more resilient to climate disruption and further reduce annual energy use. IMHO, a 'Passive House inspired' version of the building code, is something we should be discussing. Please feel free to contact me, I'd be happy to discuss.