

June 27, 2016

The Department of Public Safety

Attention: Stephen Carley

This letter offers comments, on behalf of the Town of Wellesley, on the energy efficiency codes in the draft 9th edition of the Building Code.

Wellesley Town Meeting has adopted a goal to reduce greenhouse gas emissions from all segments of the Town— residential, commercial and municipal—25 percent below 2007 levels by 2020. As a residential community, more than half our emissions are generated to heat, cool, light our homes and other buildings, and power the appliances and electronics in them. Thus the energy efficiency requirements in the building code are an important tool to help us achieve our Town goal.

The energy efficiency standards in the building code are important not only because buildings are the largest source of emissions, but also because buildings have such a long useful life. Decisions at the time of construction or renovation will have an impact that continues far longer than other decisions such as what type of car or refrigerator to buy. Further, incorporating energy efficiency features during initial design and construction is more cost-effective than adding them later.

For these reasons, Wellesley, like 174 other towns, adopted the stretch energy code. This was, in fact, the first initiative to reduce emissions undertaken by the Town. We appreciate and support the degree to which the stretch code initially raised the bar for energy efficiency and hope to see that ambition repeated in the revised stretch code.

Our specific comments on the current proposal address three issues.

- We appreciate that the proposed revisions will bring the base code and the stretch code into alignment, both working from IECC 2015 and ASHRAE 90-1 2013. We believe that this alignment will facilitate the process of compliance and inspection and alleviate the confusion which has sometimes occurred during the last several years. We urge the BBRS to continue the practice of revising the two codes simultaneously in the future.
- We commend the significant improvements in the base code and support the inclusion of proposed requirements to
 - provide the wiring and electric capability to support a charging station(s) for an electric vehicle(s) in new residential and commercial construction
 - provide, for new residential and commercial construction which has solar-suitable conditions, the schematics, wiring channels and clear space to facilitate installation of roof-top solar at a later time
- We are disappointed in the lack of “stretch” in the draft stretch energy efficiency code and particularly disheartened that the proposal does not include any stretch requirements for

existing residential and commercial buildings or for new commercial construction of less than 100,000 square feet. This is a significant reduction in coverage from the stretch code as originally adopted. We urge the BBRS to strengthen the proposed stretch code to incorporate

- energy efficiency standards for residential renovations, retrofits and additions that exceed the requirements in the base code, but are less stringent than the stretch code requirements for new construction

Residential renovations, retrofits and additions are currently subject to the stretch energy code and appropriately so, we believe. Their removal from stretch code requirements would significantly diminish the beneficial impact of the stretch code. In 2015, for example, Wellesley issued 90 permits for new residential construction and over 500 permits for residential alterations and additions.

- energy efficiency standards for commercial construction between 5,000 and 100,000 square feet in size. As in the current stretch code, these requirements would be appropriately modified to be less stringent than the stretch code requirements for new construction of 100,000 square feet or more.
- energy efficiency standards for commercial renovations, retrofits and additions. Again as in the current stretch code, these requirements would be appropriately modified to be less stringent than the stretch code requirements for new construction.

Just as with residential construction, scaling back commercial construction subject to the stretch code significantly diminishes the beneficial impact of the stretch code. Commercial alterations substantially exceeded commercial new construction in Wellesley in 2015, including permits for more than \$50 million in major renovations.

We believe that the more specific recommendations in these areas submitted by the coalition including the Sierra Club, the Conservation Law Foundation and others would significantly improve the stretch code and support their adoption.

Thank you for your consideration of these comments. Please contact Katy Gibson, Wellesley Sustainable Energy Committee, with any questions on these comments.