



SMART GROWTH AND REGIONAL COLLABORATION

**Comment Letter Guidance**  
for the Board of Building Regulations and Standards (BBRS)  
regarding the need for a Net Zero Stretch Code  
November 12, 2020

**Background:**

On November 10, 2020, the Massachusetts Board of Building Regulations and Standards (BBRS) held its bi-annual Public Comment Hearing virtually. More information on the agenda for this meeting is [here](#). An updated version of the Massachusetts Energy Zero (EZ) Code proposal, a prescriptive Net Zero stretch code option for commercial new construction 5,000 square feet and larger, which was first proposed as an update to the Stretch Energy Code in May 2020, was one of the proposals on the agenda. You can view the updated EZ Code proposal submission [here](#). MAPC was one of many partners helping to develop the EZ Code, led by the Northeast Energy Efficiency Partnerships (NEEP) in conjunction with the Massachusetts Zero Energy Buildings Coalition, a group of building industry experts, advocates, and other partners.

The BBRS has indicated since June 2019 that it is open to hearing from Massachusetts municipalities on the issue of what an update to the Stretch Code could look like and on the applicability of a Net Zero energy code to communities in Massachusetts. At the November 10, 2020 hearing, several municipalities were able to provide testimony in support of a Net Zero code pathway. MAPC is now encouraging municipal stakeholders to submit written comments to the BBRS by November 24, 2020 to amplify the support of – and need for – a net zero stretch code for Massachusetts cities and towns.

**About the Massachusetts EZ Code:**

First and foremost, the MA EZ Code seeks to drive commercial new construction to net zero emissions through a focus on deep energy efficiency. For the remaining energy that the building requires, the EZ Code pathway highly incentivizes electrification and then requires renewable energy as the source to meet electric and thermal demand.

We anticipate that, in 2022, the BBRS will update the Massachusetts Base and Stretch Energy Code to the 10<sup>th</sup> Edition. The state code will be based on the 2021 International Energy Conservation Code (IECC), which many Massachusetts municipalities voted on in the fall of 2019. Based on past precedents, the State may also amend the 2021 IECC to increase specific efficiency requirements when adopted as the State's Base Building Energy Code.

AIA Massachusetts previously submitted a code change “Zero Code” proposal to the BBRS to amend the current Appendix 115 AA (the Stretch Energy Code). The AIA MA Zero Code proposal functions largely to adopt the IECC 2021 Zero Code Renewable Energy Appendix (ZCREA), which focuses on the addition of renewables, either onsite or offsite, to commercial new construction in order to help it reach net zero.

The MA EZ Code proposal seeks to incorporate and enhance the AIA MA Zero Code proposal by addressing the need for a flexible and comprehensive framework to rapidly pursue the Commonwealth's GHG emissions reduction goals. The MA EZ Code proposal would build on the

renewables requirements within the Zero Code proposal by requiring deep energy efficiency and electrification in addition to renewable energy that is sourced locally and cleanly, including an onsite solar requirement, as feasible. This Stretch Code would be structured as a prescriptive path, meaning a developer could comply with the code pathway without conducting energy modeling. A prescriptive path can provide helpful and inexpensive guidance to developers to construct a net zero building.

As the current EZ code proposal applies only to commercial buildings, a new committee has formed within the Massachusetts Zero Energy Buildings Coalition to focus on developing a residential EZ code. This residential EZ code would complement the current EZ commercial code to provide a fully comprehensive stretch code update option. The EZ Code package, if adopted, would ensure that all square footage from new buildings in Stretch Code communities would be constructed to a net zero standard.

**How to Submit:**

Comment letters should be submitted to the Board by **November 24, 2020**.

The letter can be attached to an email and emailed to Dan Walsh at the Division of Professional Licensure in the Office of Public Safety and Inspections at [dan.p.walsh@mass.gov](mailto:dan.p.walsh@mass.gov).

In the body of your email, indicate that your comments relate to proposal 11-03-2020 Code Change Proposal Mass. Zero Energy Buildings Coalition and the November 10, 2020 BBRS Public Hearing.

**Sample Letter Language:**

[MUNICIPAL LETTERHEAD]

November XX, 2020

TO:

Richard Crowley, Chair

Lisa Davey, Vice-Chair

Massachusetts Board of Building Regulations and Standards (BBRS)

**Re: Comments from [MUNICIPALITY] in support of the Massachusetts EZ Code (Proposal 11-03-2020) as an update to the Massachusetts Stretch Energy Code, pursuant to 780 CMR Chapter 115 Appendix AA**

Dear Chair Crowley and Board Members,

We would like to thank the Board of Building Regulations and Standards for inviting comments on building code proposals, both at the virtual public hearing on November 10, 2020 and subsequently through written comments. We appreciate the Board's efforts to continue to engage the public and municipalities in particular through virtual meetings at this time.

We are writing today from [MUNICIPALITY] with our support for Proposal 11-03-2020, the Energy Zero Code 2.0 (EZ Code 2.0) proposal [OR with our support for the principles of net zero that the EZ Code 2.0 embodies]. We recognize the importance of a robust and consistent Stretch Energy Code that truly stretches to meet the needs of this time while also preserving the safety of our residents and protecting their health and resilience into the future. We look forward to working with the BBRS on developing updates to the Stretch Energy Code that enable both the Commonwealth and cities and towns to meet their ambitious climate goals.

Our community is interested in participating in this discussion to ensure feasibility in conjunction with progress in minimizing energy consumption and carbon pollution. A strong Net Zero Stretch Code can concurrently build deeply efficient buildings while optimizing the co-benefits of improved public health, resilience, and comfort. An updated stretch code must require robust thermal envelopes and enclosures, reduce energy use, electrify space and water heating, emphasize renewables to support electrification, bolster resilience, and accelerate deployment of electric vehicles, solar, and battery storage. We support these components of the EZ Code proposal as it relates to commercial construction, and likewise support the development of a companion residential net zero pathway.

**Why your municipality is vocal on this issue:**

- Who you represent: Where your municipality is located, population, information about energy use in the municipality
- Your net zero, climate, or energy efficiency commitments and targets: How do these align with State targets, i.e. the State's Net Zero commitment (memorialized in April 2020; see [here](#)) and Green Communities Designation requirements? What types of steps has your municipality taken toward this goal?
- Engagement with codes: Have you attended BBRS meetings or followed/participated in the vote on the 2021 IECC?

**The Massachusetts EZ Code 2.0 (Proposal 11-03-2020):**

- Share your reasons for supporting this proposal. Would stronger energy efficiency, renewable energy requirements, or shifts to electrification be particularly beneficial or important to your municipality? How do these align with your community's goals?
- Why does it matter to your municipality that the Stretch Energy Code is updated or that a net zero code pathway is adopted? This is a good place to highlight how the current code limits your municipality's ability to meet your targets, or to highlight support from residents.
- What next steps would you like to participate in: Can the Board reach you for further discussion? Will you attend future meetings, or follow the progress of this code proposal?

Thank you for your time and attention to this urgent and important matter.

Sincerely,  
Municipal Official

