MASSACHUSETTS FEDERATION OF BUILDING OFFICIALS

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Curtis Meskus President
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Greetings members of the BBRS

I am Curtis Meskus, Certified Building Commissioner for a Town, and currently the President of the Massachusetts Federation of Building Officials (the Federation). The Federation was formed several years ago to serve as a unified voice for the Building Officials. The Federation is comprised of, and represents the members of regional inspectors' associations.

I'd like a few moments to comment on some proposed code requirements for the 9th edition.

First, stretch energy code,
Section xxx, this provision should not be adopted, the is nothing in the green community act that requires an above the code minimum for participation, paraphrasing only that; all new residential construction over 3000 sf and all new commercial construction to minimize, to the extend feasible the life cycle cost of energy.

Market forces and the owners desire to reduce energy cost should drive higher than IECC minimums for insulation levels, air leakage and the installation of more efficient equipment. The desire of an owner to obtain LEED certification on their own and the benefits to the owner of that program is a sufficient voluntary standard above the code minimums to advance energy conservation.

The patch work of community's that have adopted the stretch code causes building officials to spend an inordinate amount of time teaching contractors and home owners the varying requirements of an energy code the varies from community to community, building type and project type. This coupled with the impact the continual increase in the IECC that the building official must impart on the builders each time it updates take valuable time from the core mission of the building code safety in the built environment.

Second, solar ready roofs
Section XXX, the information proposed to be gathered and limited preparation required for something that may happen in the future is an unnecessary exercise. The permit application process already prescribes the require design roof loads which is annotated in a code summary for a project, pointing out on a drawing a roof configuration that may have changed since the project inception, what is readily observable in the field or even through Google Earth along with the possible path of electrical conduits is busy work.

Should we provide load calculations for increased HVAC capacity in case the occupancy of a space changes from retail to a movie theater and proved roof load information for the larger roof top unit in case?

If the owner of a building in planning or under construction is contemplating a solar roof installation, they will design that building, conduit paths and place other roof top units to meet the need of the solar panels. Trying to make provisions for something that may happen in the future for technology that is constantly changing is an unneeded burden on all.

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Third, electric vehicle charging
Section XXX, Once again the market, building owners desire to obtain LEED points, provide customer or employee services should drive the installation EV charging stations not code requirements.

If you look around at a variety of buildings you can see that retrofitting EV charging stations to a building is not an insurmountable project, a restaurant I frequent has some, the mall has them, the Boston Common parking garage has them. I search the web to Plugshare.com; there I found 30 or more locations down town Boston, admittedly there are fewer shown in further west, all seem to be retrofits.

Respectfully,

Curtis Meskus, President,
Massachusetts Federation of Building Officials