

To: Mass EEAC

From: Betsy Harper, Treasurer, Passive House MA (PHMA) and Owner, Birchwood Sustainable Development

RE: Public Comment on the Draft 3-year Plan specific to the Path to Zero 1-4 initiative

Date: June 10, 2021

I am writing as both a member of the board of PHMA and as the owner of my real estate development firm which is focused solely on building Passive House and Net Zero single family or 1-4 unit multifamily residences in the Boston area. There are not many developers like me who are focused directly on building high performance small residences. The reason is that the cost premium that I've experienced for building to Passive House certification level has been 8-15%. I've been willing to absorb this cost, but in so doing, have undertaken significant risk in finding buyers of this niche product. As you know, developers need incentives to be able to overcome this cost premium and appeal to a wider buyers' market. Therefore, I welcome the addition of a 1-4 unit category for the PH Incentive Program, per the draft of the 3-year plan. However, I see significant need for improvement, as I outline below.

- 1.) As written currently, the Plan refers to a requirement for a building to achieve results "similar to other high-performance building standards, such as Passive House." Instead, this requirement should have a pathway explicitly for Passive House certification. Achieving certification is the only way to ensure critical quality control over both design and construction.
- 2.) The requirements need to be written in a manner that is straight-forward and not overly complex. Currently the Plan calls for several items, each of which isn't sufficiently specific, and each of which would require the PA's to hire new entities to evaluate a project's compliance of each:
 - design incentives intended to encourage development of "high-performance design plans" (what is the latter?)
 - training for architects, builders and trade allies (will this be specifically targeted to professionals focused on the smaller, 1-4 unit market?)
 - achieve a checklist of performance criteria (currently undefined, and very hard to agree upon what will create an integrated high-performance product). This checklist will be unproven and controversial. Who is going to develop this?
- 3.) The current proposal has no definition of incentive amounts. These are critical to establish so that the public can react to the proposed levels.

In summary, I strongly recommend that the 1-4 Path to Zero Initiative include PH certification as an alternate pathway. PH provides a proven set of requirements that have been created and improved upon by building scientists over several decades. The enforcement required for PH certification is the best way to ensure quality control.