

Dear MA EEAC,

*I'm voicing my support for the Passive House initiatives in the draft three-year plan, including expanding the successful incentive and training programs. I would also like to support the proposal of a 1-4 unit incentive program and a retrofit program, both based on Passive House. In order for the state to meet its climate goals, it is essential that we move towards net zero energy for all buildings and Passive House is the way to achieve it.*

*HRI recently completed a 98 unit affordable housing development in Cambridge that achieved Passive House. The incentives were an important component to the funding of the development and its long term viability to create resilient sustainable housing for the most vulnerable populations.*

*Passive House is based on fundamental building science principles and decades of practice, offering the quality, durability, verification, and assurance that the industry needs now to begin scaling up the production of healthy, net zero, and climate resilient buildings.*

*I would also like to support incentives to expand the low income multifamily housing program to provide deeper incentives toward deep energy retrofits and the pursuit of PH for existing buildings.*

*Our portfolio of affordable housing units is over 1500 and the housing stock ranges from a three unit building to a 300 unit building. The opportunity to do deep energy retrofits to these properties and other housing stock across the state is needed if we are to achieve our climate goals. These existing buildings are often more challenging than new construction which requires additional engineering analysis to develop a tight envelope and a reduction in energy consumption . Funding measures like added insulation and additional cladding assemblies , high performance windows , air barrier materials , ERV's , ductless mini splits all should be considered as measures that are eligible for incentives and rebates, as well as any nuances related to the existing building that would impede the opportunity to create a tighter envelope.*

*The EEAC should also provide incentives for developments that are reducing embodied carbon.*

*The EEAC has made an impact in the last 3 year plan but it needs to go much farther if we are to achieve the Climate Goals that Massachusetts has targeted.*

*Sincerely,*

Jane Carbone