

Dear EEAC and Program Administrators,

We are glad to hear the incentives for Passive House multi-family buildings (4-story and above) have been announced by the MassSave Utilities. However, we are concerned to hear that incentives for multi-family buildings 1-3 stories will not be released until the 4th quarter of 2019. There are several proposed buildings in Newton that fall into this smaller multi-family building category and are considering Passive House certification. This delay in announcing incentives will be problematic for those projects and may represent missed opportunities. The MassSave Utilities three-year plan was announced at the end of January 2019. Why does it take so long to promulgate the incentives? By the time the MassSave Utilities release these incentives, only 2 years will remain under the plan!

In addition, we urge you to be more generous with per unit incentives for smaller 1-3 story buildings than those recently announced for larger buildings. Incremental costs to attain this level of efficiency will be higher in smaller buildings than in larger buildings. In smaller buildings, soft costs associated with Passive House certification must be spread over fewer units. In addition, higher levels of wall and roof insulation will be necessary because of a higher surface area to floor ratio in these buildings.

Are there going to be single family (1-4 unit) incentives announced for Passive House? We feel it is critical to have this incentive since between 100 and 150 new single family homes are built in Newton each year. We are also concerned that there seem to be no incentives planned to encourage office buildings and hotels to design and certify to Passive House standards. We have projects proposed in Newton that might consider Passive House that will include both building types, and they would be more likely to commit to Passive House if incentives were available.

In the long term, as energy codes become stricter and experience with Passive House construction becomes more widespread, we believe incremental costs will come down and incentives could be reduced. But now is a critical time to spur market adoption of this standard. It is essential that new construction be extremely efficient from now on for the State to have any chance to meet its 2030 and 2050 greenhouse gas emissions goals, particularly when one accounts for the carbon emissions emitted from the construction materials and activities themselves (embedded carbon). Passive House new construction is the best path forward to meet these goals.

Sincerely,

Dan Ruben

Chair, Green Newton Building Standards Committee

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