



**TOWN OF ACTON**

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March 18, 2022

Department of Energy Resources (DOER)  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
Attention: Nina Mascarenhas

Re: Stretch Code Straw Proposal Comments

Dear Commissioner Woodcock, Director McCarey, Mssrs. Finlayson and Ormond,

Thank you for the opportunity to provide feedback regarding the Department of Energy Resources (DOER) straw proposal to update the Massachusetts Stretch Code and establish a new Specialized Opt-in Stretch Code.

The Town of Acton has demonstrated a steadfast commitment to energy efficiency and climate action – from becoming one of the first communities to adopt the Stretch Code in 2010 to achieving its Green Communities 20% energy use reduction goal in 2016. In 2020, a citizen’s petition at our Fall Town Meeting declared a Climate Emergency and set a target date of 2030 to reach net zero emissions, calling on Town government and staff to work with and seek support from state and federal officials to achieve our goal. In line with the declaration and subsequent commitments our community has made to meet the net zero emissions target, we believe the specialized opt-in code should meet the following three objectives:

- It should set forth a definition of net zero that conforms with generally accepted standards, as required by the 2021 Climate Act;
- It should require electrification, any exemptions narrowly defined, fully justified, and subject to review as technology changes;
- It should apply to major renovations as well as new construction.

A growing number of municipalities have pushed for and passed their own versions of home rule petitions to seek authorization by the Massachusetts Legislature to require builders of all new construction and major rehabilitation of existing buildings not to pipe in any fossil fuels, or to obtain a waiver. At a 2021 Town Meeting, residents in Acton voted to authorize the Select Board to petition the Massachusetts General Court to enact “An Act Authorizing the Town of Acton to Adopt and Enforce Local Regulations Restricting New Fossil Fuel Infrastructure in Certain Construction.”

The Town of Acton is ready to support the state in meeting its net zero emissions target, as outlined in the *Senate Bill 9-An Act Creating a Next Generation Roadmap for Massachusetts Climate Policy*. And as the Commonwealth’s Interim Clean Energy and Climate Report for 2030 states: “New construction is projected to increase emissions between now and 2030, but low-cost policies to accelerate efficiency and electrification primarily through a high-performance stretch energy code will greatly reduce the impact from, and future retrofit costs associated with, newly constructed buildings.”

Key to meeting this target will be enabling Massachusetts municipalities to adopt said high-performance energy stretch code.

We look forward to working with the DOER and continuing to participate in the process to develop the framework for a new Specialized Stretch Code.

Respectfully,

Green Advisory Board (7 members)

Andrea Becerra, Sustainability Director