



## MASSACHUSETTS

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March 9, 2022

Department of Energy Resources (DOER)  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
Attention: Nina Mascarenhas  
Via email: [stretchcode@mass.gov](mailto:stretchcode@mass.gov)

Re: **Stretch Code Straw Proposal Comments**

Dear Commissioner Woodcock, Director McCarey, Msrs. Finlayson and Ormond, et al:

We are writing as the Massachusetts team of Mothers Out Front, a national grassroots climate justice organization with a mission to ensure a livable climate for all children. Across the Commonwealth we have more than 12,000 supporters and volunteers, who advocate to protect families and communities from the serious negative impacts of greenhouse gas emissions and air pollution on their current and future health and well-being. In addition to being mothers and grandmothers, we are architects, lawyers, scientists, public officials, teachers, healthcare providers, business owners and leaders from many other sectors. We educate the public about how the gas, oil and propane that we burn to heat our homes and other buildings is a major contributor to climate change, and we promote the personal and systematic changes needed to halt the destruction of our climate. We urge the DOER to create a new energy code that will accelerate the construction of energy-efficient, non-polluting and climate-compatible buildings.

In 2021, the Massachusetts legislature, as part of the Next Generation Roadmap Climate Policy, directed DOER to write a municipal opt-in specialized stretch code. They also gave DOER the power to provide net zero performance standards that limit fossil fuels as the source of heating for new buildings.

We thank DOER for their work in developing these new energy codes and sharing them for public comment. However, we are deeply disappointed that the proposed opt-in net-zero stretch code does not reflect the bold steps needed to meet the urgency of our climate crisis, nor does it provide cities

and towns the tools they need to effectively reduce greenhouse gas emissions from the building sector.

Just last week the latest Intergovernmental Panel on Climate Change (IPCC) released its most recent report. The findings were grim. The scientists again warned that we cannot afford to delay progress on reducing emissions; “Any further delay in... global action... will miss a brief and rapidly closing window of opportunity to secure a livable and sustainable future for all.” We hope that you can empathize with our fear, and also share our hope that at every level of government in Massachusetts our public servants will strive to preserve a livable climate future for all children.

The IPCC warnings are clear, the solutions are straightforward, and we have the technology at hand. We must rapidly transition off burning fossil fuels and curb our emissions significantly by 2030. As we take on the challenge of retrofitting the Commonwealth’s vast stock of existing buildings, we must immediately take the steps to ensure that all newly constructed buildings are highly energy efficient, powered by renewable energy, and use fossil fuel free systems for space heating, water heating and cooking (with limited exceptions for specialized uses). We urge the DOER to work together with the state legislature, the Board of Building Regulations and Standards (BBRS), government leaders and experts in the building design and construction industry to provide a municipal opt-in specialized stretch energy code requiring new buildings to be all-electric.

In 2020, the gas utilities documented over 14,000 unrepaired gas leaks along the distribution pipelines in Massachusetts. In addition to health and safety hazards, leaking methane gas creates air pollution and climate-damaging greenhouse gases at rates significantly higher than when that same gas is combusted and vented out from buildings. A recent Harvard study<sup>1</sup> found that the actual rate of leaking gas was far higher than state-reported levels and that there were no significant reductions in the methane gas loss rate over the past eight years, despite efforts to accelerate the rate of repairing leaks. We cannot continue to connect new buildings to our leaking gas infrastructure, which would only increase the magnitude of the methane leaks that urgently need to be addressed.

There are no economic or technological justifications to allow the construction of new homes, offices, schools and many other building types that burn fossil fuels and leak methane when our window of opportunity to address the climate crisis is quickly disappearing. We ask DOER to consider our climate crisis and its associated health emergency as you develop the net-zero stretch code, and in so doing, create an all-electric net-zero code. For our children, our grandchildren and all future generations.

Sincerely,

The image shows three handwritten signatures in cursive script. From left to right, they appear to be 'Anne W', 'Carol S Chamberlain', and 'Diane Sokal'. The ink is dark and the handwriting is fluid.

Anne Wright, Carol S. Chamberlain, and Diane Sokal for Mothers Out Front Massachusetts

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<sup>1</sup> <https://www.pnas.org/content/118/44/e2105804118>