



ENVIRONMENTAL LEAGUE
OF MASSACHUSETTS

March 18, 2022

Patrick Woodcock, Commissioner
Maggie McCarey, Director
Department of Energy Resources
100 Cambridge St, #1020
Boston, MA 02114

Re: Stretch Code Straw Proposal Comments

Dear Commissioner Woodcock and Director McCarey:

On behalf of the Environmental League of Massachusetts (ELM), we appreciate the opportunity to provide comments on the building stretch code straw proposal. ELM was very pleased that the Next Generation Roadmap law called for creation of the specialized opt-in building code and definition of a “net zero” building. This was responsive to the need to tackle GHG emissions from the building sector and to the number of communities that are ready to lead as we seek to reach our GHG emissions reduction mandates.

The specialized energy stretch code straw proposal, while it includes many good updates, would still allow fossil fuel heating as long as pre-electrification measures (e.g., wiring) are taken and rooftop solar is installed if feasible. We urge that the next version allow for a ban on new fossil fuel hookups, at least in the building types that can currently support full electrification economically.

The ability for municipalities to allow for future buildings to be entirely fossil fuel free is critical to decrease emissions from this sector. Several cities and towns have indicated through home rule petitions their desire to go further to reduce emissions and ensure that we are not locking in emissions from fossil fuel in new buildings. Municipalities should be allowed to make this decision by its inclusion in the opt-in code and having it be statewide would prevent a patchwork of codes.

As the proposal lays out, by 2050, buildings built after 2023 will be approximately 27% of all building space. This is a significant percentage of our buildings – and each year we delay will make it more expensive and more difficult to reduce emissions from our built environment. To that end, the opt-in code should also govern significant retrofits.

We are sensitive to the EJ considerations EEA has raised, namely more well to do communities weaning themselves off fossil fuels while other communities do not and therefore will be left paying more as the customer base for fossil fuels declines. We believe allowing some communities to pave the way should lead to statewide policy change that will bring all communities along, and that it is incumbent upon the Commonwealth to provide the resources to make that happen. We would fully support such policies.

Thank you for your consideration and the good work on the straw proposal. We look forward to seeing the next draft.

Sincerely,

Nancy Goodman
Vice President for Policy
Environmental League of Massachusetts