

## Finlayson, Ian (ENE)

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**From:** Anne Wright <awrightcc@gmail.com>  
**Sent:** Wednesday, 27 July 2022 9:58 AM  
**To:** STRETCHCODE (ENE)  
**Subject:** Stretch Code Public Comment

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To: Department of Energy Resources

Fr: Anne Wright, Mothers Out Front volunteer, and MA Building Electrification Accelerator  
Arlington Resident

Re: DOER Stretch Code Proposal Commentary

Date: July 27, 2022

Thank you for receiving [these comments](#) on the DOER proposed new Stretch Code and the Specialized Opt-in Stretch Code.

I appreciate many things included in DOER's proposed codes:

- The strength of the updated regular Stretch Code
- The appointment of a Technical Advisory Group of 20 people who will no doubt work to strengthen the codes
- For requiring that curtainwall buildings have significant renewable energy sources
- For an improved definition of a Net Zero Building
- For adding a stringent TEDI requirement for buildings
- And especially: for adding in existing buildings, so that these codes will not just apply to new construction.

There are some things I would encourage DOER to strengthen:

- Electrification requirements should be there for all buildings, not just curtainwall buildings.
- The Embodied Carbon Provisions which were in a previous draft should be restored. (DOER's current emissions calculations DO NOT include embodied carbon emissions – this must be reversed!)
- Define "large buildings" as those over 3000 square feet, so that more rehabs must be electrified.
- For larger buildings, require a Whole Building Life Cycle Analysis – which helps builders and others more accurately assess the true emissions impact of a building
- Accelerate the effective dates: we are in a climate emergency, and every day and every month we delay restricting fossil fuel production and use pushes us further toward this crisis, ill health, and global destruction. Why not allow adoption of the new Specialized Opt-in code sooner, such as between January 1st and July 1st?

Let me end by saying again that we are in a climate emergency. As I write this wildfires are spreading throughout Europe, some places in the US; and we in Massachusetts are in a serious drought and going through at least 10 days of a dangerous heat wave. I have four young adult children. I am terrified that they may spend their older years (or maybe sooner) running from wildfires, struggling from drought or windstorms, or dealing with serious food shortage problems caused by the challenges that agriculture faces in a rapidly warming world.

Please, for the sake of my children –all children – and the future of civilization, strengthen these Codes as much as possible, as soon as possible.

Sincerely,

Anne Wright  
Coordinator, Mothers Out Front Mass. Clean Heat, Clean Air Campaign  
Facilitator, Mass. Building Electrification Accelerator  
84 Milton Street  
Arlington 02474

[Letter link](#)