

August 9, 2022    *Via email to [stretchcode@mass.gov](mailto:stretchcode@mass.gov)*

Department of Energy Resources  
100 Cambridge St. Suite 1020  
Boston, MA 02114

Dear DOER,

I am Paul Dale of Wayland MA. I chair the Energy Committee of the Massachusetts Sierra Club but I am writing to speak as one individual to other individuals, to you, as dedicated public servants, about eliminating the allowance for fossil fuels in the opt-in net-zero building code.

I feel confident that as individuals you know that burning hydro carbons in a building is totally inconsistent with the law requiring achievement of net-zero, and contrary to health protection and minimizing cost. I am here to bolster a conviction to do the right and the necessary thing for the common good, by eliminating fossil fuels from the net-zero code.

Let's quickly review a few realities:

- First, burning natural gas in an air-sealed building is a public health disaster for the occupants because the pollutants such as nitrogen oxides and sulfur dioxide become trapped in the building. How can you promulgate a building code that damages people's health? Building codes are there to protect health and safety.
- Second, both natural gas and propane release CO<sub>2</sub> when burned. We can't get to net zero if we keep releasing CO<sub>2</sub> to heat our homes. Importantly, propane releases 17% more CO<sub>2</sub> than natural gas per unit of heat produced. Propane is worse than gas in reducing emissions.
- Third, if there was ever a time when gas was a transition fuel, that time is long, long past. In new construction now, just a few decades away from 2050, more than in any other setting, this is the setting where we must be locking in the final net-zero result from the outset.
- Fourth, cost arguments used to oppose all-electric buildings don't stand up to scrutiny: To allow fossil-fuel heating today creates an obligation to replace the system before its end-of-life – a huge and unnecessary cost. Today, there is little to no added cost or lack of heating comfort by installing heat pumps at the time of construction. And the operating cost will be much less with renewable electricity where there is no cost for fuel; renewable electricity generated locally, not inextricably tied in with the global oil markets.

Each of these considerations – health, emissions reductions, cost to build, and cost to operate – by themselves mandate the removal of fossil fuels from the net-zero code.

As public servants, dedicated to the common good now and in the future, I'm sure that you understand more than anyone the pressure of private industry leaders on government officials to not change these regulations. As part of the Sierra Club, my work is to allow you to say to those interests, "If we don't take this demonstrably effective, economic and beneficial action now, we will be held accountable by the public for causing harm to our residents, our economy, and environment." The advocacy community has your back so you can stand up and use your voice to advance this protective and common sense policy to create an all-electric opt-in specialized stretch code, with common sense waivers similar to other all-electric building codes. This is your opportunity to stand up and call for the action that you know is correct. Architects and builders are rising to the challenge. They have delivered many all-electric, energy-efficient net-zero designs that save money and some that generate more energy than they consume. Please, follow their lead, rise to the occasion; we have your back.

Thank you,



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