



MAYOR ALEX B. MORSE

CITY OF HOLYOKE

March 9, 2016

Secretary Michael A. Beaton
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Dear Secretary Beaton,

We are writing to express our deep concern with the draft stretch energy code recently released by the Board of Building Regulations and Standards. While the new base code should be commended for "lifting the bottom" in building performance, one would be hard-pressed to call this proposed update a "stretch" at all.

As you know, the stretch code garnered national recognition for Massachusetts' energy efficiency efforts, and is one of the many reasons ACEEE has rated us #1 in energy efficiency among states for four years running. It is the cornerstone of the Green Communities program, providing an avenue for cities and towns to meet the requirement that "all new residential construction over 3,000 square feet and all new commercial and industrial real estate construction ... minimize, to the extent feasible, the life-cycle cost of the facility by utilizing energy efficiency, water conservation and other renewable or alternative energy technologies."

Over 150 communities have voluntarily adopted the stretch code since 2009, demonstrating the high value placed on this tool to help reduce energy use in the built environment. From the Energy and Environmental Affairs "Faces of Green Communities" page:

"Becoming a Green Community enabled the city to take advantage of regulatory tools, such as passing the stretch building energy code...Boston's biggest energy challenges lie in its abundance of older buildings and infrastructure, as well as in motivating behavior changes on the part of building occupants."

"Springfield has identified the large number of buildings and vehicles that comprise its municipal portfolio as both its greatest energy challenge and greatest energy opportunity. Many of the 100-plus buildings managed by the city were constructed decades ago and did

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not incorporate efficiencies that are commonplace now. Investments in retrofits, replacements, insulation, motion sensors, and other technologies can allow the city to overcome this energy policy barrier and greatly increase energy efficiency.”

The original stretch code was ambitious -- it sought to cut energy use by 30% and carbon emissions by 40% compared to the base code. The new draft of the stretch code exempts commercial buildings smaller than 100,000 square feet and only applies to new buildings -- effectively excluding much of the commercial buildings in the state. For residential construction, the new stretch code simply makes the voluntary 2015 IECC base code option of scoring a 55 or less on the HERS Index mandatory, so homes already using this option would not see any additional requirements.

The revised stretch code should maintain the same quality of ambition and incremental progress over the revised base code. To be a useful tool for Green Communities, the stretch code must create net positive benefits and establish a gap between itself and the base code.

We know you and Governor Baker are committed to listening to the voices of local cities and towns. In this case we ask

~~that you support a stretch code that has allowed cities and towns to cut energy costs and reduce carbon footprints.~~

This “update” to the stretch code fails to exceed the efficiency of the base code for many buildings, which defies the very intention of a stretch code. Instead of a potential step forward, this proposed stretch code is a side-step in our progress in reducing reducing energy expenditures and our greenhouse gas emissions. We, the undersigned communities, urge you to keep Massachusetts moving forward by supporting a new and stronger stretch code, and we look forward to continued dialogue about how best to achieve that.

Sincerely,

Mayor Alex B. Morse
City of Holyoke