



The Commonwealth of Massachusetts  
MASSACHUSETTS SENATE

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

**Re: Building Code Comments**

Dear Commissioner Woodcock, Secretary Card, and Secretary Kennealy,

I am writing to support DOER in developing a specialized stretch energy code that ensures the Commonwealth can meet building sector emissions targets while making buildings a core climate mitigator and protector of our health.

The climate bill that Governor Baker signed into law yesterday is a necessary step, but it is inefficient to accelerate the scale of net zero construction and renovations. A statewide opt-in net zero building code is urgently needed to transform buildings from polluters to protectors of our health and the climate. **A robust opt-in specialized stretch code is needed to electrify ALL buildings, new construction and renovations.** My climate legislation work in the Senate has greatly aligned with this initiative and the following recommendations for the proposed specialized stretch energy code:

**Eliminate fossil fuel pathways for new construction and renovations**

This is the best next step we can take in aligning stretch codes with the statewide climate targets. It will assist in developing more climate-resilient buildings and protect the most vulnerable MA constituents – those who would be affected the most due to health reasons or living in an Environmental Justice community.

**Expand the electrification requirements to encompass all new buildings**

These codes will save developers money in the long run. Any building built today with fossil fuels will need to be retrofitted at greater cost and complexity before the end of its useful life, wasting money, burdening our energy infrastructure and challenging our emissions reductions goals.

### **Restore the deleted embodied carbon provisions**

The codes will require all buildings, not just those with a certain amount of curtain wall, to meet prescriptive specifications for low-carbon construction materials. These provisions will require Whole Building Life Cycle Analysis for large buildings, leading to smarter design choices moving forward.

### **Accelerate effective dates**

The codes will drop the 6-month minimum lead time and allow municipalities to vote whenever they choose by allowing municipal adoption by a vote that takes place any time before the January 1st or July 1st effective dates. We must ensure that municipalities who seek to combat the climate crisis through such means will not face limitations in doing so.

### **Clarify and expand on-site solar generation**

The codes will require all buildings not only those powered by fossil fuels – to have on-site solar panels in proportion to gross building square feet. I support the state's commitment to transition away from fossil fuels while supporting the growth of the solar industry, as the solar industry in MA employs more than 18,000 residents statewide and has installed over 1,600 megawatts of solar already. The solar requirement would better align with state climate goals, and require fair value and fair compensation for goods and services received by utilities.

### **Require rooftop solar on all new buildings where feasible**

As we move towards meeting aggressive carbon reduction goals, we need to support actions that result in more green jobs and the proliferation of clean energy sources like solar to power life for residents across the Commonwealth. Including a rooftop solar requirement would support the state's commitment to transition away from fossil fuels while supporting the growth of the solar industry which employs more than 18,000 residents statewide and has installed over 1,600 megawatts of solar already.

### **Clarify curtain wall and electrification requirements**

Electrification would be required for all buildings and the definition for curtain wall area would be clarified. It would include the whole system of framing, glazing, and spandrel panels.

### **Show how 2030 building sector limits are met**

The path to emissions improvements will be better outlined. Based on DOER's current numbers, it seems the Straw Proposal might reduce emissions by 10% by 2030. That's not enough. DOER must be transparent and show the public and the Legislature what it will take to meet 2030 emissions goals. To reach the 2030 goal, all new buildings must be net-zero and approximately 100,000 existing buildings must be electrified each year. The scale of this project requires, at minimum, an opt-in net zero code.

Thank you for your revisions to the straw proposal following the submission of 1200 comments from residents. These revisions represented several key improvements in the code language, including incorporating an industry-standard definition of net-zero building, requiring multi-family projects above 12,000 square feet to meet Passive House standards, and forming a Technical Advisory Committee with expertise in building codes and climate resilient buildings. I hope that you can take into account the needs and recommendations of community advocates, members of the commonwealth, and myself in advocating for developing a specialized stretch energy code so the Commonwealth can make buildings that meet building sector emissions targets, function as core climate mitigators and protect our health.

Sincerely,

A handwritten signature in blue ink, appearing to read "James B. Eldridge", with a stylized flourish at the end.

**James B. Eldridge**

State Senator

*Middlesex and Worcester*