

**CLIMATE ACTION COMMITTEE**

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Mr. Ian Finlayson

Department of Energy Resources

100 Cambridge Street, Suite 1020

Boston, MA 02114

Dear Mr. Finlayson,

The Wellesley Climate Action Committee commends the Department of Energy Resources (DOER) on its new proposal for an updated Base Code, Stretch Code, and Municipal Opt-in Specialized Code (Opt-in Code). However, several elements of the latest Opt-in Code proposal fall short of providing Wellesley the support it needs to meet town-wide greenhouse gas (GHG) emissions reduction goals. This letter contains our recommendations for important changes to the DOER proposal. We also support the changes outlined in the Massachusetts Net Zero Buildings Coalition's Good, Better, Best document, which is attached.

Brief Background:

Wellesley is a Green Community and achieved a 25% reduction in greenhouse gas emissions (GHGs) between 2007 and 2020. Wellesley established Municipal Sustainable Building Guidelines in 2020 encouraging all new municipal projects to be all-electric and net zero ready. Two new schools under construction and the planned renovation of our 1896 Town Hall are all-electric, net zero ready, and comply with the Town's Sustainable Building Guidelines.

Wellesley Town Meeting overwhelmingly approved updated climate goals in 2021, calling for net zero emissions by 2050 with interim targets of a 75% reduction below 2007 levels by 2040 and a 50% reduction by 2030. Wellesley's 2021 Climate Action Plan identifies actions for meeting these goals and calls for all new construction to be net zero ready by 2025.

Recommended Changes to the Municipal Opt-in Specialized Code:

1. Expand electrification requirements

Requiring electrification for all new buildings and major renovations is essential for meeting Wellesley's climate goals; and Wellesley's Climate Action Plan calls for all-electric new construction by 2025. Buildings comprise approximately 61% of Wellesley's total emissions and about 79% of those emissions are from fossil fuel heating, hot water, cooking, and clothes drying. Delaying a comprehensive all-electric requirement will slow investment in the clean energy economy, delay the transition to net zero buildings, impede critical GHG mitigation, and lead to costly building retrofits in the future. Additionally, the absence of a comprehensive electrification requirement burdens municipal staff and officials with monitoring and attempting to influence building projects in the interest of reaching ambitious climate targets.

2. Subject all residential and commercial additions to the updated Stretch Code

Wellesley's climate goals require all new construction projects, regardless of size, to maximize energy efficiency and electrification readiness. The Opt-in Code proposal subjects residential additions less than 1,000 sq. ft. and commercial additions less than 10,000 sq. ft. to the Base Code. We recommend all residential and commercial additions comply with the updated Stretch Code.

3. Clarify which building alterations qualify as "Substantial Improvements" and prevent unintended uses of this alteration category

An equitable and rigorous Opt-in Code is essential for helping Wellesley's existing building stock improve energy efficiency and transition to all-electric. However, DOER should ensure that inclusion of "Substantial Improvement," (an alteration defined in terms of assessed value) does not disadvantage lower-value property owners, especially in Environmental Justice communities. DOER should also take steps to prevent the Substantial Improvement provision from offering an undue advantage to owners of large, expensive properties. If these unintended consequences are unavoidable, DOER should not base thresholds on assessed value.

Wellesley's buildings contribute 61% of town-wide emissions and nearly two-thirds of these buildings have not undergone renovation in more than 40 years. Most of these buildings require substantial energy efficiency improvements as reflected in the following energy use intensity (EUI) values:

- Residential buildings cover 24.3 million sq. ft. and have an average EUI of 65 kBtu/sq. ft./yr.

- Commercial/institutional buildings cover 10.8 million sq. ft. have an average EUI of 104 kBTU/sq. ft./yr.

We were pleased to see the Stretch Code will replace the Base Code for residential change of use, additions of 1000 sq. ft. or 100% of building area, and for Level 3 alterations. More than 63% of Wellesley commercial real estate has recently changed ownership or is likely to in the near term, making it essential for the Town to be able to rely on robust provisions for commercial alterations and change of use and occupancy.

4. Acknowledge embodied carbon for large building projects

We recommend the Stretch Code acknowledge the importance of embodied carbon in new building projects by requiring use of a Whole Building Life Cycle Assessment tool for large building projects.

5. Augment the solar requirement

Meeting Wellesley's climate goals will require approximately 1,950 solar installations by 2030 and 3,900 solar installations by 2050. To support this work, we ask DOER to clarify and expand requirements for on-site solar generation for all buildings, not only those heated by fossil fuels.

Implementation of an evolving and complex building code requires continuing education for construction supervisors. The one hour of training currently required for construction supervisor license renewals seems insufficient. We ask DOER to use its influence to help bring about more extensive, annual building energy code training. As a point of reference, Massachusetts-registered architects must complete 12 hours of continuing education every year. All 12 of these hours must qualify as Health, Safety, and Welfare as do hours devoted to building energy and other code-related topics.

Many communities, like Wellesley, are trying to achieve crucial local and state climate goals by transitioning our new and existing buildings to net zero. Please provide us with the tools we need to accomplish this urgent and challenging task.

Sincerely,



Sue Morris, Chair

On behalf of the Town of Wellesley Climate Action Committee