



# The City of **WORCESTER**

**ETEL HAXHIAJ**  
District 5 City Councilor

455 Main Street  
Worcester, MA 01608

Date: August 8, 2022

Thank you for taking into consideration my comments on the DOER proposed new Stretch Code and the Specialized Opt-in Stretch Code.

I appreciate many of the elements included in the DOER's proposal that will allow us to strengthen emergency efficiency and electrification for our community. Adding existing buildings, in addition to new construction, is a step in the right direction.

Worcester's aging housing stock is in severe need of electrification and deep energy retrofits. Most of our residents are housing-cost burdened and live in triple deckers. Adding to their housing costs are high utility bills, substandard housing conditions that include poor insulation, air sealing, and unhealthy emissions from gas-burning stoves. As a city councilor and mom, I am worried that those who will most get hurt if we are not able to meet our climate goals, are environmentally justice communities, housing and energy-burdened residents, those without resources and our children.

Worcester is also seeing a boon in new construction. Over 5000 new housing units have been built or are in the process of being permitted. We desperately need an opt-in stretch code that allows municipalities like Worcester to eliminate fossil fuels in new construction.

Therefore, I encourage the DOER to strengthen the draft codes in the following ways:

1. **Eliminate all fossil fuel pathways for new construction and renovations.** We need a specialized stretch energy code that protects the health of our most vulnerable residents, by eliminating the fossil fuel pathway for new construction and requiring all building types be constructed all-electric.
2. **We need a statewide opt-in net zero building code to transform buildings from polluters to protectors of our health for a livable climate.** The 10-town ban provision in the climate bill would prohibit fossil fuels in new construction. As one of the in the footsteps of these 10 municipalities. We need the most robust opt-in specialized stretch code to regulate and electrify ALL buildings, new construction, and renovations, available to ALL communities.
3. **Allow for municipal adoption by vote to take place any time before the Jan 1st or July 1st effective dates.** Municipalities like Worcester should be free to vote whenever they choose to have the earliest effective date.
4. **Incentivize green communities to adopt the opt-in net zero stretch code using the state-funded green communities grant pool, up to \$10 million per year, as provided for in the Green Communities Act.** Worcester is a Green Community. DOER's proposed

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stretch code would allow green communities to retain their designation without adopting a true net zero opt-in stretch code, a standard that is critically needed both for public health reasons and for reducing emissions.

5. **Restore the provision to reduce embodied carbon.** Only by reducing operational *and* embodied carbon can buildings become climate mitigators with impacts beyond the building scale. DOER must require all buildings to meet specifications for low-carbon construction materials. DOER must also require Whole Building Life Cycle Analysis modeling for larger buildings -- this will encourage smart design choices that are so urgently needed.

Thank you for giving my concerns, as a Worcester City Councilor and a mother, due consideration.

Respectfully Yours,

Etel Haxhij,  
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