

Department of Energy Resources (DOER)  
100 Cambridge Street, Suite 1020  
Boston, MA 02114  
Attention: Nina Mascarenhas

June 22, 22

Re: Stretch Code Straw Proposal

The climate crisis often seems like a remote problem. Compared to the problem of getting things done at work, finding good schools for our children and paying the mortgage, it seems like something we can deal with tomorrow. In spite of the strange weather and the predictions of scientists, we can go about our day-to-day lives and largely ignore it unless, of course, we are faced with a tornado or “moderate storm surge” that nonetheless brings salt water pouring into our basements. We understand that to the gas utilities and the heating oil delivery companies, the problem of keeping the business running and the owners happy cannot be ignored. The people who work for those companies need to protect their jobs and builders worry if they can sell a house that has heat pumps and induction cooking.

Yet the truth is that unless we aggressively do everything possible to reduce greenhouse gases, we face a crisis that will make the Civil War and the Great Depression look like bumps in the road. Children who are born today will, before their natural lives are out, see much of Boston, Cape Code, and the North and South Shores under water. Large parts of the world will become too hot to live in, including much of the American South. The refugee problem that has been seen as a crisis will seem trivial. In Bangladesh alone, the area where 30 million people live will be under water so much of the time that it will not be inhabitable. Central America has already lost much of its farmland to drought. The refugee problems will stretch our charitable instincts to the breaking point. Migration even within the U.S. will be massive. Most of South Florida, Arizona, parts of Texas, Alabama, Mississippi and Louisiana we be flooded or too hot to live in or both.

We repeat these horror stories because the Stretch Code Straw Proposal seems largely to take the building code revisions as business as usual. It does not allow, even in the opt-in stretch code, for communities to ban new methane heating although methane is 80 times as powerful a greenhouse gas as carbon dioxide over its first 20 years in the atmosphere and still 30 times as powerful over a 100-year period. It allows buildings with glass walls that have almost no insulation. And this is the code for buildings in towns that adopt the most stringent codes that are being proposed. Does DOER think that this is the best we can do to respond to climate change? Is this what the Legislature was proposing in the Roadmap Bill as a way to get to net zero carbon by 2050?

In 2018, the Town of Ashland Town Meeting voted overwhelmingly to make Ashland net zero by **2040**. The task was delegated to the Sustainability Committee and we have been working at it diligently ever since. We need to make major changes including insulating current homes much more thoroughly, replacing gas and oil heat with electric heat pumps, transitioning to electric automobiles, school buses, and police cars, and protecting

our tree cover, composting all food waste, and many more things. But if builders are allowed to build new buildings with gas and oil heat, our task will be impossible.

Others have provided technical analyses of the details of the problems with the proposed code revisions (see the letter from the MA Net Zero Buildings Coalition). We will not try to repeat them here. What we ask is simply that, in constructing the revised building codes, DOER take the climate crisis as seriously as the threat it is.

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