

March 17, 2022

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

Re: **Stretch Code Straw Proposal Comments**

Dear Commissioner Woodcock, Secretary Theoharides, and Secretary Kennealy,

We are writing to you as members of the Falmouth Climate Action Network, a group advocating for implementation of climate solutions that will allow our town to thrive as a beautiful and resilient coastal community. We support our town's declaration of a climate emergency and its commitment to reduce net greenhouse gas emissions within and by the Town to zero at the earliest technically and economically feasible time.

We also support the Massachusetts Next Generation Roadmap law targeting a 50% reduction in greenhouse gas emissions by 2030— less than 8 years from now. A new net-zero stretch code is a necessary tool to achieve this transformation while ensuring that change happens in an equitable way that addresses historic injustices related to housing and development.

We believe that the draft specialized stretch code for municipal adoption that DOER presented for public review on February 8th is inadequate to support such a transformation and does not adequately address the needs of Massachusetts communities such as Falmouth. In particular, the allowance of fossil fuels for newly constructed buildings is at odds with every standard and professional definition of net zero, and ensures that residents, tenants, and owners of newly constructed fossil fuel buildings will still have to bear the cost of decarbonizing down the line.

We believe that it is imperative that DOER develop a net zero stretch code consistent with the Next Generation Roadmap law and the need to significantly reduce greenhouse gas emissions in the next decade. The code should:

- Require buildings to be energy efficient with electricity as the primary energy source, with dedicated renewable energy and low embodied carbon materials as feasible, to ensure that newly constructed homes and workspaces are healthy, resilient, and future-proofed.
- Support buildings that are affordable to heat and cool for low-income residents burdened with high utility bills. Low-income residents and those living in environmental justice and frontline communities are the most vulnerable people in the Commonwealth to being left out of the transition to clean energy and healthy homes.
- Support our state's long-term economic health by creating strong demand for clean energy jobs by incentivizing its adoption. Buildings are a major driver of our economy and building construction and renovation can easily drive billions of dollars of cost effective economic stimulus.

- Be implemented now. We are losing crucial time to ensure a livable future for our children and grandchildren. Each newly constructed building is part of our community for decades to come. All-electric, efficient construction is already cost competitive with conventional building methods. Towns and cities are ready to adopt a true net zero stretch code in 2023, and the market is ready to build true net zero buildings.

This year the International Panel on Climate Change warned that “there is a rapidly narrowing window of opportunity to enable climate resilient development.” We implore DOER to meet the climate emergency with leadership and purpose, and ensure the Commonwealth gets the buildings we deserve today, not years or decades down the road. Develop a true net zero stretch code that requires the best building design and construction practices already available to transform our buildings to help ensure a livable, breathable future for all.

Sincerely,

David Mark-Welch on behalf of the Falmouth Climate Action Network