



**ELDERS
CLIMATE
ACTION**

Massachusetts Chapter

August 12, 2022

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

Re: Building Code Comments

Dear Commissioner Woodcock, Secretary Card, and Secretary Kennealy,

Elders Climate Action (ECA) Mass submits this letter to the Massachusetts Department of Energy Resources with comments on the specialized stretch code.

ECA Mass applauds DOER for the revisions that were made to the code in the most recent version. Thank you for listening to advocates and making several key improvements including:

- Incorporating the industry-standard definition of net zero building and the optional pathway found in 2021 Base Code Appendix, also known as the Zero Code.
- Requiring multi-family projects greater than 12,000 square feet to meet Phius CORE or PHI standards and
- Forming a Technical Advisory Committee with expertise in building codes and climate resilient buildings.

However, we urge you to make other revisions that will assure the building sector in Massachusetts can meet the ambitious greenhouse gas reduction goals proposed in the 2025, 2030 Clean Energy and Climate Plan (CECP). We fully support all the recommendations included in the letter you will be receiving from Massachusetts Climate Action Network, which we have signed onto.

In this comment we draw your attention to two approaches to expanding requirements that would lead to an increase in the construction of all electric buildings:

1. There is a wealth of evidence that shows that new construction can be affordably electrified and can even cost less than mixed fuel options, especially when space heating operational costs are factored in. **So we believe it is time to allow municipalities to require all new construction and major rehab projects to be all electric with very few appropriate exceptions.**

By making this a choice for municipalities, each town or city can explore the concerns of developers and builders in their area and make their own decisions on this issue. If there is lingering concern among some developers and builders that cost issues may discourage some all electric construction, then **a municipality should be allowed to make exceptions to the all electric requirement based on cost if the developer or builder provides convincing evidence to an appropriate municipal decision-making body that all electric is not practically affordable.**

2. Requiring new homes greater than 4000 square feet to be all electric or HERS 0 is a great step in the right direction. But if you decide not to require that *all* new construction be all eclectic, then **we urge you to consider dropping that threshold down to 2000 square feet to include many more homes under the standard.**

Thanks for attention to our concerns.

Sincerely,

Roger Luckmann MD MPH
44 Grove Road, MA 01760
Elders Climate Action Mass

Elders Climate Action Massachusetts is an organization of over 1000 members committed to using our experience, broad perspectives, wisdom and sense of urgency to develop and implement effective climate change policy while there is still time to avoid catastrophic changes in the earth's climate.