



August 10, 2022

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

Electronic submission only

Re: **Building Code Comments**

Dear Commissioner Woodcock:

Greater Boston Physicians for Social Responsibility (GBPSR) is a physician-led group of health professionals and community members working to address two of the existential threats to human health: nuclear war and climate change. Our members include nationally recognized experts in public health, cancer epidemiology, occupational medicine, environmental health, emergency medicine, disaster preparedness, and the health effects of climate change. We offer state-of-the-science and up-to-date medical and public health information about the effects of fossil fuels on human health and the climate crisis.

Burning fossil fuels continues to drive the climate crisis. The resulting exponential increase in greenhouse gas emissions is creating a public health emergency worldwide. Heating buildings is a significant source of greenhouse gas emissions in Massachusetts. We urge the DOER to develop a net-zero opt-in code that will accelerate the construction of energy-efficient, all-electric buildings.

Since we submitted testimony to DOER in March, the climate crisis has inexorably worsened, with a steep toll in preventable deaths:

- Wildfires across the world worsened air quality. Air pollution is leading to one in five deaths according to a recent Harvard study; in 2019, there were almost 2800 air pollution deaths in Massachusetts;
- Extreme heat was responsible for many deaths here in Massachusetts and across the world;
- Eastern Kentucky experienced unprecedented flooding, leading to loss of life and livelihood; and
- The risk of food insecurity increased, as wheat crops across the US failed.

Last year, 46 million health care providers declared the climate crisis “the single biggest health threat facing humanity” and called on world leaders to deliver on climate action. The UN Director General, Antonio Guterres, called the climate crisis a code red for humanity, indicating immediate danger to all of us.

This year, atmospheric methane and carbon dioxide concentrations continued to increase, setting another record high. We are concerned that the opt-in net-zero code doesn’t reflect the urgency of the climate crisis or the intent of the Next Generation Roadmap Climate Policy.

We strongly encourage the DOER to:

- Develop an all-electric opt-in code for all building types for which the technology to be all-electric already exists;
- Improve energy efficiency requirements;
- Account for and curb embodied carbon emissions related to construction; and
- Allow cities and towns to opt-in and implement the code as soon as possible.

Massachusetts plans to convert a million homes to heat pumps and yet the current proposal works at odds with this goal by allowing fossil fuel in new construction. Burning fossil fuels will continue to drive the climate crisis and the associated health emergency.

We request the DOER consider the climate emergency in its deliberations and develop an all-electric, opt-in code. Doing so will help mitigate the climate crisis that threatens the health and wellbeing of all citizens in the Commonwealth.

Sincerely,

Andee Krasner, MPH
Program Manager, Climate and Health