

Energy Efficiency Division  
Massachusetts Department of Energy Resources  
100 Cambridge Street, 10th Floor  
Boston, MA 02114

August 11, 2022

**Re: Draft Municipal Opt-in Specialized Stretch Code**

We wish to express our appreciation to DOER for the many beneficial changes made in response to prior comments from the public.

In addition to the changes made thus far, Climate Action Now, Western Mass, with its 2,500 members advocating for policies and legislation that rapidly reduce our GHG emissions, urge that the following revisions be incorporated into the final code:

- **Require all new building types, additions, and large renovations be all-electric.** Allowing fossil fuel options in the Specialized Stretch Code weakens our ability to meet mandated emissions reduction targets. The climate bill recently signed into law allows only 10 communities to require all-electric construction; this optional building code is necessary to allow more municipalities to prohibit fossil fuel combustion in new buildings if they wish to do so.  
It must be emphasized that allowing new buildings to combust fossil fuels now will incur significant future costs when stricter emissions limits will be required, burdening future owners of these structures. Developers should be constructing buildings now that will meet these needs, rather than kicking the can down the road and burdening future owners. The technology for all-electric construction already exists and is cost-effective.
- **Restore the omitted requirement to include embodied GHG emissions of building materials in emission calculations.** The use of high GWP building materials may result in the immediate and significant release of GHG that will take decades to recover with operational energy savings; we cannot afford this delay. Buildings should be constructed with cost-effective low embodied carbon materials.
- **Require on-site solar generation for all building types in proportion to gross square feet to the extent feasible.** Exempting all-electric buildings makes no sense.

It must be emphasized that since this optional Specialized Stretch Code will only apply to communities that choose to adopt it, failing to make the above changes will prevent municipalities from requiring true net-zero construction that they consider essential to prepare for the future health, comfort, and wellbeing of their residents.

Sincerely,

*Adele Franks*, Steering Committee Member

On behalf of Climate Action Now, Western Mass (CAN)