

August 12, 2022

Commissioner Patrick Woodcock
Massachusetts Department of Energy Resources
100 Cambridge Street, Suite 1020
Boston, MA 02114

Re: 225 CMR 22 – Residential Low – Rise Construction Stretch Code
225 CMR 23 – Commercial (and all other) Construction Specialized Code

Dear Commissioner Woodcock,

I am writing on behalf of the Massachusetts Retail Lumber Dealers Association (MRLDA) to offer our comments on the proposed new residential and commercial stretch and opt-in energy codes.

MRLDA represents, unites, educates, and supports MA lumber and building materials (LBM) dealers and associated businesses. MRLDA represents over 100 MA companies across the Commonwealth who collectively generate over \$123 million in sales tax revenue for the State and are primary suppliers to the homebuilders industry in MA.

We understand how difficult it is to obtain approval to build housing units in MA and how expensive that process has become. We have observed that the construction of single-family housing units needed to meet consumer demand has diminished dramatically. This is particularly true now as, like all industries, we are experiencing significant building material supply shortages that have dramatically increased the cost to build single- and multi-family housing. Our members provide materials to homebuilders on credit to begin their projects before they receive project financing from their lenders. We know that as the cost of construction rises, it can become more difficult to finance the construction of new housing units in MA.

We understand there are almost always competing or conflicting interests whenever public policy makers consider changes to the law or are tasked with promulgating regulations. Your agency certainly faces those challenges as you consider the goal of improving energy efficiency while ensuring that the new guidance does not adversely impact the cost of building the much-needed housing units in Massachusetts. While the focus of these regulations is on the issue of energy efficiency, we also urge you to carefully consider the impact of any final regulations on the cost to construct affordable housing units.

MA is already one of the most expensive housing markets in the United States. Unfortunately, the costs continue to rise with no relief expected in the near future. This reality has caused many residents to leave the Commonwealth in order to obtain more affordable housing. This exodus will only be exacerbated as the cost to build housing units continues to climb. We are concerned that regulations to achieve greater energy efficiency will adversely impact the lower- and middle-class workers who will not be able to afford to live in MA. It is well documented that the police officers, firefighters, and teachers that we need to serve our local communities often cannot afford to live in the areas they are committed to serve. The lack of affordable housing also reflects negatively on the state as employers consider employee housing costs when determining whether to relocate their business operations to MA. We therefore urge you to consider balancing these two very important public policy interests when drafting your final recommendations.

We urge the Division not to force home builders to switch to an electric energy supply system that is powered by the same fossil fuels that will be restricted for use in individual or multi-family housing units. The Division should consider the power providers' ability to deliver renewable electric power before placing costly requirements on home buildings which will not result in an actual shift to a renewable source of power.

We recognize that more needs to be done by our industry to work towards a more sustainable and energy efficient economy, but we hope to do so in a business-friendly manner that also meets the needs of our customers and the communities we serve. We offer ourselves as a resource for a proactive partnership to amend policies to make them work for both the environment and America's small businesses.

MRLDA also recognizes the fact the Department of Energy Resources has convened a Stretch Energy Code Technical Advisory Committee of code experts to review and provide technical feedback on the code language. We commend and thank you for these efforts and are hopeful they will ensure our comments are taken into thorough consideration.

The MA independent LBM suppliers and associated businesses thank you for your time and consideration of our views on these proposed regulations.

Sincerely,

A handwritten signature in black ink, reading "Julianna C. Rauf". The signature is fluid and cursive, with the first name being the most prominent.

Julianna C. Rauf
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