



To: Massachusetts Department of Energy Resources (DOER)

From: The Environmental Ministries Team of the Southern New England Conference of the United Church of Christ

Date: March 7, 2022

Subject: **Comments concerning the Draft Specialized Building Code**

**Who We Are:** Rooted in the grace of God, the mission of the Environmental Ministries Team is to inspire, empower and assist its member congregations to protect our planet, be faithful stewards of all Creation, and engage in environmental justice issues, partnering with those most affected by the impacts of climate change to make God's love and justice real.

As the largest Protestant denomination in Massachusetts (**338 churches and 13,500 members**), we are also the Commonwealth's oldest denomination, with roots going back to the Pilgrims.

The United Church of Christ (UCC) in Massachusetts has a long history as champions of justice: from publishing the first anti-slavery tract to more recently passing the first resolution on "Open and Affirming" in 1984. In 2009 we became the first church-body in America to pass a science-based resolution on climate change.

In 2017, the UCC National Synod representing 5,100 churches and 1.1 million members passed a Resolution of Witness declaring that

#### **THE EARTH IS THE LORD'S – NOT OURS TO WRECK**

"God's great gift of Creation – the context in which all life seeks fulfillment – is in crisis. Driven by material aspiration, humanity's use of fossil fuel since the Industrial Revolution has broken Creation's balance. The scale of Creation's demise is dramatically expanding beyond our comprehension. Never has the earth and the climate changed so quickly. ... We view the current climate crisis as an opportunity for which the church was born."

#### **Our Comments and Concerns on the Draft Specialized Building Code:**

We are committed to transforming buildings from being polluters to being protectors of our health, our communities and our environment. The building code is a powerful tool to accelerate this transformation and address historic injustices related to housing.

The draft specialized stretch code is inadequate to support such a transformation. 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 in the future.

DOER should adhere to the mandate in the Next Generation Roadmap law by revising the draft to ensure:

- That newly constructed homes and workspaces are healthy, resilient, and future proofed. This means, above all, that the building envelopes must be highly efficient, on par with a passive house. Retrofitting a building envelope after the fact is extremely expensive, often impractical. It must be “built right” from the start. A highly efficient envelope supports buildings that are affordable to heat and cool for low-income residents burdened with high utility bills.
- That, with narrow exceptions, fossil fuels are not deployed in new construction or building usage for any purpose, including heating, cooking, clothes drying and water heating.
- That, wherever feasible, low embodied carbon materials are required. It has taken a long time for this matter to get people’s attention. Constructing buildings out of certain materials results in lower embedded (or embodied) carbon. The use of materials such as wood, (as opposed to steel), recycled pipes, etc. lowers the embodied carbon. As an example, a building that commendably has ground-source heat pumps, daylighting, super insulation, lots of PV panels and a wind turbine may have a low “cost of operation” carbon footprint, but it may still be made out of new steel, aluminum façade panels, etc. and have a horrible embedded carbon footprint. The result is an “average” building, at best, from an overall carbon perspective.
- That roof designs are required that will support a significant amount of solar. Too often architects like to create discontinuous rooftops, roofs with gables, a compass orientation that is not conducive to solar production, roofs with angles, etc. They do this for aesthetic reasons, but it can eliminate the potential for solar as much as does shading.
- Rapid implementation. We are losing crucial time to ensure a livable future for our children, grandchildren and neighbors. It is a sin to construct any new buildings now that harm our future when we have the materials and know-how to avoid this. We urge you to make a true net-zero stretch code available in 2023. There is no cost argument against doing so.

We implore DOER to meet the moral crisis of our time by ensuring that the Commonwealth gets the buildings we need **today**, not years or decades down the road.

Respectfully submitted,

On behalf of the Environmental Ministries Team of the  
Southern New England Conference of the United Church of Christ

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