

May 28, 2019

Rob Anderson
Chief of Inspections
MA Office of Public Safety and Inspections
1000 Washington St., Suite 710
Boston, MA 02118

Re: Joint Comments from the Cities of Boston, Cambridge, and Somerville on updating the Massachusetts Stretch Energy Code, pursuant to 780 CMR Chapter 115 AA

Dear Chief Anderson:

Thank you for the opportunity to provide testimony and comments on the Stretch Energy Code. The Cities of Boston, Cambridge, and Somerville are looking forward to working with the Board of Building Regulations and Standards (BBRS) on developing the next iteration of the Stretch Energy Code.

Background

The Cities of Boston, Cambridge, and Somerville are home to 880,000 residents, 13% of the Commonwealth's population. The three communities are among the most densely populated in the country, with approximately 85-90% of residents living in multi-family homes. We all participate in the Metro Mayors Coalition (MMC), a voluntary forum of 15 cities and towns in which mayors and managers exchange information and develop solutions to common problems. For example, the MMC has taken leadership in setting ambitious targets to increase housing development by creating 185,000 new units of housing across the region by the year 2030.

Our cities along with the other members of the Coalition are also committed to climate action. All three of our cities have been designated in the Commonwealth's Municipal Vulnerability Preparedness (MVP) Program; we have completed vulnerability assessments, adopted adaptation plans, and begun implementation. All members of the Coalition have adopted the goal of net-zero carbon emissions by 2050, supportive of the Commonwealth's own goals and the Global Warming Solutions Act (2008 Mass. Acts 298). Like many of the neighbors, our three communities are designated Green Communities by the DOER and have established strong climate and energy programs.

The City of Boston committed in 2017 to be carbon free by 2050, under the leadership of Mayor Martin J. Walsh. The City of Boston has extensive programs in building energy efficiency, district energy, efficient and alternative transportation, and zero waste, as outlined in its existing Climate Action Plan, GoBoston 2030, and other planning documents. To ensure that it remains on track to achieve carbon

neutrality, the City is conducting the third update of its Climate Action Plan, informed by the recent Carbon Free Boston report prepared by the Boston Green Ribbon Commission.

The City of Cambridge has committed to achieve carbon neutrality by 2050. In 2015, the City enacted the Net Zero Action Plan which aims to set Cambridge on the trajectory to eliminating greenhouse gas emissions from buildings which are responsible for over 80% of the City's GHG emissions. The Plan proposes targets for achieving net zero emissions in new municipal buildings starting in 2020 followed by targets for small residential, commercial/multifamily and laboratories between 2022-2030. The Net Zero Action Plan is being implemented in coordination with the City's forthcoming Climate Change Preparedness and Resiliency Plan in order to protect the health and welfare of Cambridge residents while reducing GHG emissions throughout the City.

The City of Somerville under the leadership of Mayor Joe Curtatone committed in 2014 to net-zero greenhouse gas emissions by 2050, and in 2018 Mayor's administration and community partners released the City's first action plan, Somerville Climate Forward, setting a near-term goal for net-zero emissions standards for new building construction. Based on the City's 2017 Carbon Neutrality Pathways Assessment, high performance building standards that include energy efficiency and electrification will contribute to over 10% of the emissions reductions necessary to achieve carbon neutrality by 2050.

The Stretch Code

The Massachusetts Stretch Energy Code is a key foundation of municipal climate plans. However, it is no longer functioning as it was intended.

In total, 215 of the 351 municipalities statewide have adopted the stretch energy code, including the large majority of communities in the Greater Boston region. The Cities of Boston, Cambridge, and Somerville seek to reach our ambitious climate commitments while providing our communities with greater health, resiliency, economic, and environmental outcomes. For the following reasons, we believe that the stretch energy code needs to be updated in the near term:

- **The current stretch code is a barrier for our municipalities' ability to require greater energy efficiency during a period of substantial development.** The base code has caught up to the stretch energy code in efficiency, which effectively has taken away municipalities' ability to choose a meaningful stretch code option for their communities. The lack of a higher-performance stretch energy code is hampering our municipalities' ability to advance our commitments to achieve carbon reductions in buildings by requiring higher levels of energy performance in new buildings.
- **Net zero buildings can be cost-effective to build today.** The construction industry in Massachusetts has demonstrated the technical and economic viability of Passive House or Net Zero standards for many types of buildings. These highly energy efficient buildings can save consumers thousands of dollars over the building's life cycle.
- **Energy efficiency is a life safety code.** More efficient buildings provide safety and wellness benefits including improved indoor air quality and the ability to shelter in place for longer durations during storm events and power outages. Net zero buildings reduce fossil fuel combustion, improving both indoor and outdoor air quality, in the city where pollution is concentrated and leads to asthma and other health impacts, particularly among our most vulnerable populations. Many hospitals and schools in the region have already built highly efficient buildings to take advantage of the numerous co-benefits of energy efficiency. The stretch

to all communities, and all populations within those communities, as we plan for and update our building stock.

- **Energy efficiency drives cost savings and increased equity.** The significant operational savings that come with very low energy consuming buildings are essential to increasing the affordability of housing in our cities, where high housing costs are key issues.
- **A clear, high alternate standard for the Massachusetts building sector will spur innovation and adoption.** A state-wide stretch code with a path to net-zero will provide a strong signal that encourages and incentivizes the construction and development sectors to adopt best energy and efficiency practices and to improve and innovate in ways that make high performing building development even more cost effective.

To address these concerns, the Cities of Boston, Cambridge and Somerville urge the BBRS to add an agenda item to the June 11, 2019 regular meeting of the Board in Tewksbury to begin a discussion to update the Stretch Energy Code alongside the adoption of the 2018 IECC, matching the effective date of January 1, 2020 for a new stretch code.

The Cities propose that the BBRS update the stretch energy code so that it is phased to meet Net Zero or comparable standards. The new stretch energy code could be supported by existing standards such as PHIUS+2018, Living Building Challenge, LEED Zero, and Architecture 2030 Zero Code. A viable net zero code pathway would provide consistency for the market across the state and align with the Commonwealth's Global Warming Solutions Act mandates. The stretch energy code is an appropriate vehicle for a safe and consistent advanced energy efficiency pathway. The Cities would be eager to work with the BBRS to define the criteria of a "net zero" stretch code in a way that aligns with the commitments of our communities and other communities across the state.

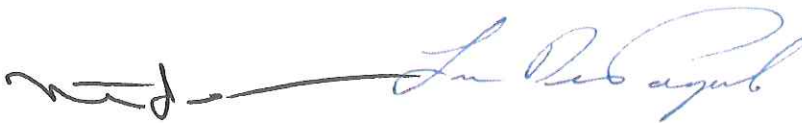
Thank you for the opportunity to provide testimony and comments on the Stretch Energy Code. We look forward to working with you on the important matter.

Sincerely,

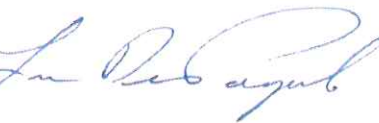
CITY OF BOSTON

CITY OF CAMBRIDGE

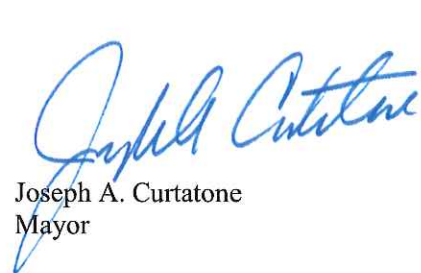
CITY OF SOMERVILLE



Martin J. Walsh
Mayor



Louis A. DePasquale
City Manager



Joseph A. Curtatone
Mayor