John Couture, Chair  
Kerry Dietz, Vice-Chair  
Massachusetts Board of Building Regulation and Standards (BBRS)  

cc.  
Governor Baker  
House Speaker Robert DeLeo  
Senate President Karen Spilka  

Dear Chair Couture, Vice-Chair Dietz, and members of the BBRS,  

We, the Massachusetts building, design, construction, and sustainability community, thank you for taking the first step towards implementing the Net Zero Stretch Code and directing the Energy Advisory Committee that reports to the BBRS to develop a draft of the Net Zero Stretch Code. Climate change is arguably the greatest environmental, financial, and societal threat of our time, therefore, it is imperative that we adopt regulations that ultimately achieve negative net emissions. A myriad of organizations and individuals from the Massachusetts building professional community have come together to sign this letter. Each signatory reiterates the importance of implementing a Net Zero Stretch Code.  

In Massachusetts, existing commercial and residential building operations (including on-site combustion and electricity consumption) result in nearly half of the total annual greenhouse gas emissions.¹ Most buildings constructed today will still be in operation long after the 2050 deadline by which Massachusetts must reach 80% carbon neutral (per the Massachusetts Global Warming Solutions Act).² Therefore, it is imperative that we take action now in order to reach our Greenhouse Gas (GHG) emission reduction goals.  

New buildings can and must be designed to meet Net Zero now, if we expect to have a carbon neutral building stock in the future. Therefore, we the undersigned building industry professionals and building industry organizations are writing to urge the BBRS to develop and promulgate a Net Zero Stretch Code, raising the bar from the current Massachusetts Stretch Code.  

As building industry professionals and organizations, we have the experience and expertise to demonstrate that Net Zero buildings offer many advantages including: better health and comfort, lower total cost of ownership, and greater resilience and that Net Zero is achievable now.  

**Health Advantages**  
Net Zero buildings improve public health by reducing combustion emissions, thereby reducing both indoor and outdoor exposure to carbon monoxide, particulates, NOx, SOx, and elevated CO2 levels. Net Zero buildings also offer improved occupant health and comfort through strategies such as greater con-  

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¹ MA GHG Emissions Trends  
https://www.mass.gov/service-details/ma-ghg-emission-trends  
² Global Warming Solutions Act Background  
control of indoor temperature due to increased insulation, enhanced humidity control via improved exhaust air energy recovery, improved indoor air quality due to filtered mechanical ventilation, reduced risk of mold due to tighter envelope assemblies, and appropriate balance of glare control and access to natural light and views.

Financial Advantages
Studies, such as The Economics of Zero-Energy Homes (Rocky Mountain Institute),³ and the Zero Energy Buildings in Massachusetts: Saving Money from the Start (USGBC MA),⁴ demonstrate that Net Zero buildings carry a negligible construction cost premium and result in significantly lower total cost of ownership. For example, when building construction is financed through loans or bonds, Net Zero buildings typically save more in operating cost than the marginal uptick in loan or bond payments, resulting in positive cash flow from day one. Additionally, Net Zero and Green Buildings have enhanced asset value, reducing financial risk to developers looking to turn over properties.

Extrapolating from savings achieved by the MassSave program,⁵ a Net Zero building code will result in billions of dollars in net benefits to the Commonwealth. Also, by reducing the total monthly cost to own or rent, Net Zero housing offers greater affordability, and thereby would help to address the current housing crisis currently affecting low-income families in many parts of the Commonwealth.

Resilience Advantages
Net Zero buildings typically offer greater resilience through reduced demands on emergency infrastructure (such as lower fuel consumption by emergency generators) and “passive survivability”, whereby the envelope performance allows habitable conditions even when no active mechanical systems are operational. In addition, there is the opportunity for on-site renewable energy and storage systems to provide power to select building loads for periods of longer power outages.

Due to these advantages, many communities in Massachusetts are interested in Net Zero community planning and Net Zero buildings. Under current regulations, towns and cities in Massachusetts do not have permission to adopt a Net Zero code, as they cannot deviate from the state-wide codes promulgated by the Massachusetts Board of Building Regulation and Standards (BBRS).

Thus, a coalition of towns and cities recently appealed to the BBRS, requesting that the BBRS develop a Net Zero Stretch Code. A Net Zero stretch code will give those communities the opportunity to improve how buildings are designed and built now, getting us closer to meeting our climate goals as outlined by Governor Baker.

³ The Economics of Zero-Energy Homes (Rocky Mountain Institute)
https://rmi.org/insight/economics-of-zero-energy-homes/
⁴ Zero Energy Buildings in Massachusetts: Saving Money from the Start (USGBC MA)
https://usgbcma.org/zero-energy-buildings/
⁵ All Cost Effective Energy Efficiency
**Net Zero Today**

Net Zero buildings are achievable today: as building industry professionals and organizations, we have witnessed and engaged in the design and construction of residential and commercial Net Zero buildings at many scales and budgets, including a broad range of building uses and architectural styles. Homeowners, businesses, institutions, and developers are now taking advantage of the benefits of Net Zero buildings at all scales. This has led to exponential growth in the number and size of Net Zero buildings in recent years.\(^6\)

Massachusetts is not alone in the pursuit of Net Zero buildings. In California, all new residential buildings must be Net Zero as of 2020 and all new commercial construction must be Net Zero by 2030\(^7\). Mayors of New York City, Portland, Seattle, and Washington DC have also committed to requiring Net Zero operation for all new buildings as of 2030\(^8\). Massachusetts has an opportunity to continue our legacy of national leadership in energy efficiency, design, and building technologies, positioning our state as an economic exporter of expertise and services.

We recognize that the details of the Net Zero Stretch Code will require a concerted effort to develop, and should include input from building industry professionals. It is beyond the scope of this letter to address specific suggestions. Our letter simply calls for a Net Zero Stretch Code to be developed and promulgated because it is a critical component of Massachusetts leading the way toward a livable climate.

Based on our collective experience with successful Net Zero buildings, we are confident that a Net Zero Stretch Code will be developed that is flexible and easily achievable with today’s technology, enhances public health, results in financial savings to building owners and tenants, improves resilience, and supports economic growth in the Commonwealth.

The many advantages of a Net Zero Stretch Code make it a clear win for the Commonwealth of Massachusetts. As building industry professionals and organizations, we support the development and adoption of a Net Zero Stretch Code and urge you to take swift action on behalf of the people of the Commonwealth.

Sincerely,

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6 New Buildings Institute Getting to Zero List  
7 California Energy Efficiency Strategic Plan  
[https://www.cpuc.ca.gov/ZNE/](https://www.cpuc.ca.gov/ZNE/)  
8 C40 Cities Net Zero Carbon Buildings Declaration  
[https://www.c40.org/other/net-zero-carbon-buildings-declaration](https://www.c40.org/other/net-zero-carbon-buildings-declaration)
Organizational Signatures

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A9 Green / Total Green Energy Solution, LLC
Sustainable Performance Institute
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Lisa Monahan, Principal | Lisa Monahan Metal Works, Newton
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Long Vu, Project Engineer | ERS, Revere
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Mark Walsh-Cooke, Principal | Arup, Boston
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Tuyen Santos, Mechanical Engineer | Garcia, Galuska & DeSousa Inc., Dartmouth
William Jiménez, Senior Designer | Arup USA, Inc., Boston
William Mancortes, Site Supervisor | PlaceTailor, Boston
William Tang, Senior Associate | BR+A, Boston
Winnie Carey, Staff Accountant | BR+A, Hudson
xiaoman ji, architect | Dimella Shaffer, newton
Xiaomeng Nie, Architect | Payette, Abington
Xiaoying Chen, Architect | CambridgeSeven, Cambridge
xun chen, architect | Cannondesign, boston
Yanel de Angel, Principal | Perkins+Will, Boston
Yasmin Maura-Orihuela, Architectural Designer | Sasaki, Boston
Yennifer Pedraza, Interior Designer | Payette, Boston
Ying Zou, Fire Protection Engineer | BR+A Consulting Engineers, Boston
Yolanda Romero, Architectural Job Captain | Stull and Lee Architects and Planners, Boston
Yongchan Kwon, architectural designer | elkus manfredi architects, cambridge
Yongjoo Kim, Principal | CambridgeSeven, Belmont
Yordani batista, Construction Site Supervisor | Placetailor, Boston
Youngduk Kim, Architectural Designer | CambridgeSeven, Cambridge
Yunbin Park, Senior Associate | ARC, Boston
Zach Rohlfs, Plumbing Engineer | BR+A, Burlington
Zachary Stanesa, Senior Project Manager | Miller Dyer Spears / MDS, Boston
Zachary Stanesa, Senior Project Manager | Miller Dyer Spears / MDS, Boston
Zeeshan Shiwalla, Intern | POAH, Boston
Ziyang Zeng, Urban Designer | Sasaki, Boston
Zsuzsanna Gaspar, Principal | Goody Clancy, Boston