

#### **MEMORANDUM**

**TO:** Honorable City Council

FROM: Christine Blais, Director, Office of Sustainability and Environment

**CC:** Kate Crowley, Environmental Policy Manager

DATE: December 8, 2025

**RE:** Rental Registry and Energy Disclosure Ordinance

Dear members of the Somerville City Council,

The Office of Sustainability and Environment (OSE) respectfully requests consideration of the adoption of the Rental Registry and Energy Disclosure (RRED) ordinance. This memo serves to update on the progress that has been made to develop this ordinance. Beyond changes to the language in the draft ordinance, this memorandum outlines:

- the substantial work that has been done in recent years to engage a diverse range of stakeholder groups on a potential RRED policy; and
- the necessary steps for implementation of an RRED program that will accomplish the city's goals while also taking proactive steps to mitigate potential unintended consequences associated with such a policy.

#### **Summary of Draft RRED Ordinance**

The RRED ordinance is a necessary step towards the city's long-term policy goals to address known health, housing, energy, climate, and city management issues. Establishing RRED would support the City in:

- 1. Addressing disproportionate health, safety, and energy burdens experienced by renters while improving city government functions.
- 2. Creating a process for proactive enforcement of health, safety, and climate standards that transfers the burden of reporting violations away from renters.
- 3. Improving equity in Somerville's rental housing market by creating safer, healthier, and more energy-efficient housing available at comparatively lower price points without unreasonably burdening small-scale landlords.
- 4. Decreasing utility customer bills, allowing more flexibility in monthly budgets for other needs, such as food, medicine, and education, putting dollars into the local economy.
- 5. Reducing Somerville's contribution to climate change by nearly one-fifth through 2050, meaningfully contributing towards meeting community-wide carbon neutrality goals.







The ordinance would require rental housing unit owners to register their unit with the city and share energy information about their rental units with prospective tenants. To comply with the ordinance, owners of Somerville-based rental units would:

- register each of their rental units annually;
- list a local point of contact for their rental unit;
- disclose energy information about rental units to prospective tenants; and
- post registration and energy information.

#### **Summary of Policy Development and Stakeholder Engagement**

Somerville Climate Forward, the community's inaugural climate action plan, was released in 2018. The plan was developed with 170 stakeholders and community members. Members of the buildings working group advised the City to include a rental registry, inspection, and energy disclosure and standards program.¹ Following the 2018 Climate Forward plan, City of Somerville staff connected with municipalities and nonprofits across North America and convened a cross-departmental working group within Somerville to deepen their knowledge of similar programs and understand how such a program could function in Somerville. About 60% of US cities have rental inspection programs. Proactive rental inspection programs have been touted as an equitable, post-COVID solution to big problems experienced in urban communities. The ordinance would create the City's first rental registration system and enhance transparency for prospective tenants and awareness of owners around energy features and usage as we work to set up a strong foundation for future programming.

The memorandum submitted to City Council on May 24, 2021, outlines the purpose of the draft rental registry and energy disclosure ordinance and extensive policy development history up to that date.<sup>2</sup> In 2024, the city was awarded grant funds<sup>3</sup> to conduct stakeholder engagement to further develop the draft RRED ordinance. The final report includes findings from 20 interviews with 33 individuals in the spring and summer of 2024, ten focus groups with 47 individuals in the fall of 2024, and a public meeting conducted virtually on November 20, 2024.<sup>4</sup> The city also

https://www.somervillema.gov/departments/programs/sustainaville/buildings-and-energy.





<sup>&</sup>lt;sup>1</sup> Somerville Climate Forward, City of Somerville, at pp. 34 <a href="https://s3.amazonaws.com/somervillema-live/s3fs-public/somerville-climate-forward-plan.pdf">https://s3.amazonaws.com/somervillema-live/s3fs-public/somerville-climate-forward-plan.pdf</a> (2018).

<sup>&</sup>lt;sup>2</sup> "RRED Memo 5.24" attached to City of Somerville File #211952 at <a href="https://somervillema.legistar.com/LegislationDetail.aspx?ID=6766902&GUID=A1E7680A-4135-4616-AA3B-267D5B679BEF&Options=ID|Text|&Search=211952">https://somervillema.legistar.com/LegislationDetail.aspx?ID=6766902&GUID=A1E7680A-4135-4616-AA3B-267D5B679BEF&Options=ID|Text|&Search=211952</a>, on agenda for May 27, 2021.

<sup>&</sup>lt;sup>3</sup> City of Somerville File #23-1208 at

https://somervillema.legistar.com/LegislationDetail.aspx?ID=6322727&GUID=4D6B5077-4601-49A2-9D9A-A1CF2D4408E5&Options=ID|Text|&Search=23-1208, on agenda for August 24, 2023.

<sup>&</sup>lt;sup>4</sup> RRED Stakeholder Engagement Final Report at <a href="https://s3.amazonaws.com/somervillema-live/s3fs-public/RRED%20Stakeholder%20Engagement%20Final%20Report.pdf">https://s3.amazonaws.com/somervillema-live/s3fs-public/RRED%20Stakeholder%20Engagement%20Final%20Report.pdf</a>, and public meeting presentation slides and meeting recording available on the program webpage at



restarted an internal working group in which Councilor Sait participated. In December 2024, Councilor Sait conveyed information regarding these efforts to this council.<sup>5</sup>

The current draft ordinance has been edited to reflect feedback from the public, City staff, city councilors, and city council staff, including substantive edits to: (1) create staggered effective dates for the rental registry and energy disclosure requirements and increase the time rental housing unit owners will have to comply for each; (2) increase the distance that a rental housing unit owner must live from the city before they must designate a representative; (3) add a hardship variance; (4) change the annual registration date; (5) lengthen the requirement to update an energy disclosure from annually to every five years; (6) delineate the Inspectional Services Department as responsible for enforcement of the ordinance, with flexibility to allow the Office of Sustainability to continue development of the program.

#### **Implementation Plan Steps**

OSE intends to work with the Council and City staff in 2026 to finalize the ordinance, and ensure the City has the necessary resources in place to implement the ordinance successfully over the coming years. The next steps to bring RRED to Somerville are:

- Refine draft RRED ordinance language; finalize ordinance.
  As summarized above, significant work has been done to incorporate feedback into the current draft RRED ordinance, but additional discussion may still be warranted on some issues. As necessary, City staff will work with the 2026 City Council to resolve any outstanding issues.
- 2. Draft and finalize the RRED program implementation manual and programmatic materials.

If the ordinance is passed, City staff will draft the program manual. The program manual would be directly informed by community and stakeholder input already conducted by the City. The City would also offer additional public engagement opportunities. The manual would define programmatic processes and procedures to comply with the ordinance, including the specific information required to be reported by rental housing unit owners. The interdepartmental working group would develop and publish the manual and programmatic materials. Materials associated with the program will be understandable to a wide audience—translated, clear, concise, and written in plain language.

Minimizing and mitigating risks to affordability and displacements are top priorities of the RRED initiative. OSE intends to continue researching and developing adjacent

https://somervillema.legistar.com/LegislationDetail.aspx?ID=7051006&GUID=0DBA29DC-6244-4481-A0D6-F95D7965F056&Options=ID|Text|&Search=24-1758, on agenda for December 12, 2024.





<sup>&</sup>lt;sup>5</sup> City of Somerville File #24-1758 at



affordability solutions through launch and beyond. For example, OSE has recently launched a rental energy microgrant program offering 25 units \$2,000 in grant funding for qualified energy upgrades.

#### 3. Secure funding for RRED program.

At a minimum, program implementation will have both advertising and printing costs, as well as software costs to develop the registry in an existing platform or to procure new software. In addition, further staffing and support for enforcement activities will be necessary.

#### 4. Conduct outreach and training.

Once implementation details are finalized and internal systems building is underway, City staff will coordinate with partners, such as the Office of Housing Stability, Inspectional Services, Assessing, and external partners to educate property owners, landlords, and tenants about the ordinance.

5. Begin enforcement of the rental registry requirements.

The rental registry requirements would be the first requirements in the ordinance to become effective (see draft ordinance for timeline). The Inspectional Services Department (ISD) would be the enforcing personnel for violations of this ordinance.

6. Begin enforcement of energy disclosure requirements.

The energy disclosure requirements in the ordinance will go into effect at a later date than the rental registry requirements (see draft ordinance for timeline). ISD would be the enforcing personnel for violations of this ordinance.

7. Submit Annual Report.

City staff will submit the annual report as specified in the ordinance.







### **Summary of Implementation Plan Steps**

This graphic summarizes which steps can be taken with existing resources available to city staff and which steps it is anticipated will require additional resources.





