

Finlayson, Ian (ENE)

From: Brad Mahoney <BMahoney@mpbos.com>
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To: STRETCHCODE (ENE)
Subject: BUILDING CODE COMMENTS

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To the State of Massachusetts:

The State of Massachusetts and the Department of Energy and Resources should be applauded for its ambitious update to its Stretch Energy Code and Specialized Stretch Code Draft Regulation, released on June 24, 2022. This provides a needed update to our energy code which directly addresses the climate crisis, which we have felt directly here in our own state and across the country with the unprecedented heat wave.

The new Stretch Energy code provides multiple Passive House compliance pathways for many building types and also includes many key Passive House elements including Energy Recovery Ventilation, reduction of Thermal Bridges, minimization of Air Leakage and an increased focus on building facade performance and reduced energy intensity.

We at Millennium Partners have learned how critical this Passive House certification and methodology is through the development and construction of Winthrop Center, which will be the largest Passive House office building in the world (800,000 sf) and the most energy efficient solution for a building of this size, scale and typology (commercial office) anywhere here in the Northeast and similarly cold climates. The energy reductions are remarkable - a typical Office building in Boston uses 150% more energy than what Winthrop Center is projected to use and this energy savings is achieved through an increased focus on a high-performance facade with triple glazed windows, robust insulation, optimization of vision glass and focused performance testing, in addition to the other elements identified in the updated Stretch Energy code.

We acknowledge there are cost premiums associated with Passive House, however as the market adopts Passive House more widely through updates such as this, these cost premiums will reduce and be cost neutral (supply chains open up, contractors become experienced with Passive House and the market embraces this methodology). Despite these marginal cost premiums at Winthrop, we are excited that we chose our Passive House path: we are finding customers are increasingly gravitating to our project because of the energy savings and positive impact on carbon reduction.

As we all search for pathways to achieve net carbon zero, this Stretch Energy code update is most critical to achieving that because the pathways to carbon zero runs straight through Passive House.

On behalf of all of us at Millennium Partners, we hope that this proposed Stretch Energy code update is adopted immediately. It is sorely needed.

Best,

Brad Mahoney
617 719 2979

Director of Sustainable Development
MP Boston