

To: Department of Energy Resources (DOER)
Attn: Nina Mascarenhas
100 Cambridge Street, Suite 1020, Boston, MA 02114
stretchcode@mass.gov

From: Michelle Lambert, Principal
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RE: Public Comments on MA Department of Energy Resources (DOER) Straw Proposal for Stretch Code Update and New Specialized Stretch Code

Date: March 17, 2022

To the MA Department of Energy Resources,

I am writing to provide comments on the DOER Straw Proposal for the Stretch Code Update and the New Specialized Opt-In Stretch Code. My comments pertain specifically to the portion of the proposed language pertaining to embodied carbon and the importance of addressing and reducing embodied carbon in all new buildings.

The Carbon Leadership Forum (CLF) is an international organization whose mission is to, “eliminate embodied carbon in buildings and infrastructure by inspiring innovation through collective action to create a just and thriving future.” They have regional chapters, called hubs, across the US and Canada working to make progress locally, and the Boston/Northeast Hub is one of the largest and most active chapters, and includes a subgroup focused on embodied carbon policy and advocacy. I co-chair this group and for almost two years, our members have participated on local municipal technical advisory groups to integrate embodied carbon into policy, provided numerous educational sessions on embodied carbon, including focuses on concrete, mass timber and other materials, and are actively working to expand the awareness and importance of embodied carbon in our path to zero carbon buildings.

“Current building codes address operating energy but do not typically address the impacts of embodied carbon in building materials and products. However, more than half of all GHG emissions are related to materials management (including material extraction and manufacturing) when aggregated across industrial sectors. As building operations become more efficient, these embodied impacts related to producing building materials become increasingly significant” (carbonleadershipforum.org).

I applaud the DOER for including a requirement in one compliance pathway that, “buildings must demonstrate embodied carbon reduction from the menu of options,” but in order to meet our state climate goals, we must reduce embodied carbon in all buildings, under all pathways. I have reviewed the straw proposal language and I have found that embodied carbon is only mentioned under the pathway for commercial buildings and large-scale multifamily only, and within that pathway, only for curtainwall buildings.

Several Massachusetts municipalities are currently drafting proposed policy language that requires analyzing, quantifying, and in some cases, reducing embodied carbon, often through zoning and special permit

requirements. These include Boston, Cambridge, Newton and others. The Commonwealth of MA can and should lead by example by addressing embodied carbon for all buildings that are required to meet the Stretch Code. The path to a true zero carbon built environment includes both reducing operating energy/carbon and the embodied energy/carbon in the materials we build with.

Thank you,

A handwritten signature in blue ink that reads "Michelle Lambert". The signature is fluid and cursive, with the first name "Michelle" and the last name "Lambert" clearly distinguishable.

Michelle Lambert, Associate AIA, LEED BD+C, CPHC
Principal, Lambert Sustainability
Carbon Leadership Forum Boston Hub, Co-chair Policy and Advocacy subgroup