

SHEPLEY BULFINCH

March 9, 2022

Ian Finlayson, Dept. Director, Energy Efficiency Division
Paul Ormond, Energy Engineer, Energy Efficiency Division
Massachusetts Department of Energy Resources
stretchcode@mass.gov

Dear Mr. Finlayson and Mr. Ormond:

Thank you for your March 2, 2022 presentation of the New Specialized Stretch Energy Code Straw Proposal. We appreciate the time you are taking to address MA AIA members' concerns and acknowledge architects' input. We are grateful to have the opportunity to comment and provide input on the upcoming exciting code changes.

Our firm, Shepley Bulfinch Richardson & Abbott, is particularly interested in the new mentioning of Embodied Carbon in the Straw Proposal. We are committed the goals put forth by Architecture 2030, which the Boston's Carbon Neutral Plan and the BPDA's Zero Net Carbon Building Zoning Initiative align with. We agree with the Straw Proposal's *"Additional requirement if using curtainwall- demonstrate embodied carbon reduction from a choice of options: Low carbon concrete, Carbon sequestering materials, recycled materials, reused materials/building reuse."* However, we feel that the requirements could be clarified and strengthened to give a firmer guidance on target reductions. As an example, perhaps the language could include a specific percentage reduction (60%) from a baseline. We would also like to see these requirements proposed for other building types to further support carbon reductions in all market sectors.

Overall, we are pleased with the straw proposal and all it strives to accomplish.

Sincerely yours,



Matt Gifford, Principal

cc: John Nunnari, Executive Director, MA AIA
Mike David, Chairman, GAC AIA
Matt Gifford, Principal, Shepley Bulfinch
Jane B. Y. Galli, Associate, Shepley Bulfinch