

# HELP WITH BERDO EMISSIONS COMPLIANCE



**Flexibility Measures** under BERDO refer to options that building owners may use to adjust their emissions limits and/or emissions reduction timelines. All flexibility measures have eligibility criteria and most require approval from the BERDO Review Board.

## AM I ELIGIBLE?

---

If any of the statements below apply to you, read on to learn more about eligibility requirements, application processes, and the potential benefits of using flexibility measures.

### I HAVE BUILDING(S) WITH MULTIPLE PRIMARY USES



#### **BLENDED EMISSIONS STANDARD** ↗

Use a Blended Emissions Standard that takes into account the mix of primary uses present in your building(s). This allows you to have an emissions standard that is based on the size of different primary uses and may increase your emissions limit.

**Application Deadline: Opt-in or opt-out during a verification year**

### I HAVE MORE THAN ONE BERDO BUILDING



#### **BUILDING PORTFOLIO** ↗

Group your BERDO buildings into a Building Portfolio and comply with a portfolio-level Blended Emissions Standard. Reducing emissions as a portfolio rather than building-by-building allows you to align your capital planning with BERDO compliance and gives you more flexibility to achieve emissions reductions over time.

**Application Deadline: September 1**

### I HAVE BEEN TRACKING AND REDUCING MY BUILDING'S EMISSIONS FOR SEVERAL YEARS



#### **INDIVIDUAL COMPLIANCE SCHEDULE** ↗

Create a customized emissions reduction timeline based on your own historical emissions. An Individual Compliance Schedule allows you to take advantage of emissions reductions that you have achieved prior to 2021 and adjust your emissions obligations based on your building operations.

**Application Deadline: September 1**

### COMPLIANCE IS EXTRAORDINARILY DIFFICULT FOR MY BUILDING(S)



#### **HARDSHIP COMPLIANCE PLANS** ↗

Demonstrate eligible technical or financial hardships for you or your building(s) and request an alternative emissions reduction timeline and/or more flexible emissions reduction targets.

**Application Deadline for Long Term Hardship: July 1\***

**Application Deadline for Short Term Hardship: October 1**

*\*After July 1, 2024, long-term Hardship Compliance Plan applications are due 9 months before the first year the HCP would be used. (April 1)*

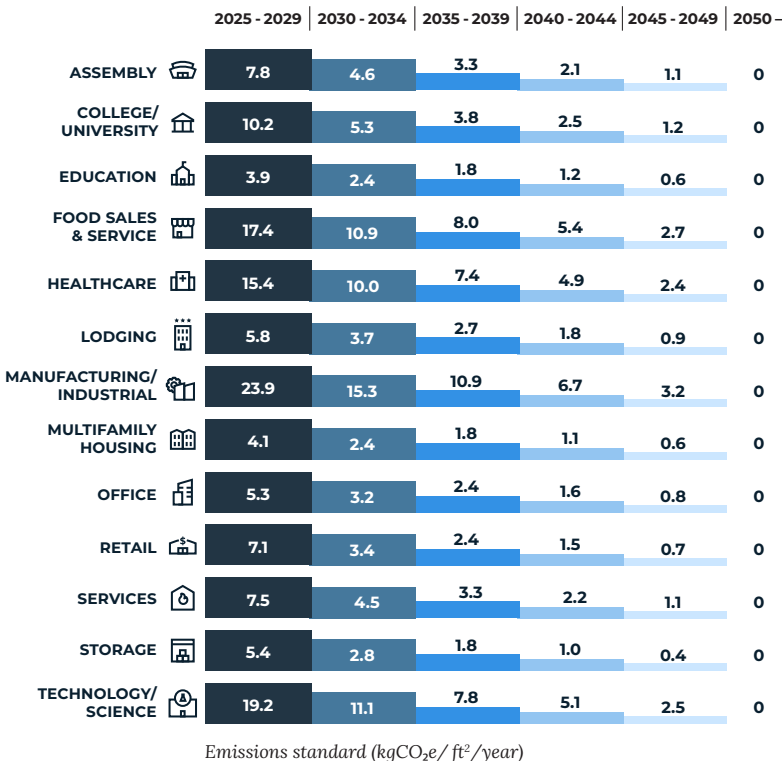
# BLENDED EMISSIONS STANDARD



## OVERVIEW

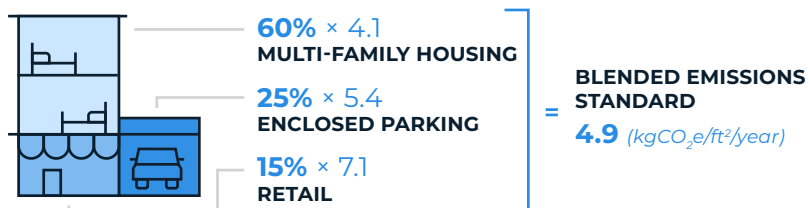
A building or Building Portfolio with more than one primary use type may opt to use a Blended Emissions Standard to comply with BERDO. As a default, buildings are required to comply with the emissions standard that matches its largest primary use type (see chart below for reference). With a Blended Emissions Standard, you can calculate an emissions limit that takes into account the mix of primary uses in your building or Building Portfolio. This allows you to have an emissions standard that is based on the size of the different uses in your building. This may increase your emissions limit, allowing more flexibility for emissions reduction planning and compliance.

## EMISSION STANDARDS FOR EACH PRIMARY USE



## BLENDED EMISSIONS STANDARD EXAMPLE FOR 2025

Multiply the percentage of each primary use's square footage by its associated emissions standard from the chart, then add those values together. Refer to our [Policies & Procedures](#) for detailed methodology.



## ELIGIBLE PRIMARY USES

Building owners may use a Blended Emission Standard if their building or Building Portfolio has two or more primary uses. A primary use means that **at least one** of the following is true:

- The building use occupies at least 10% of a building's total square footage
- The building use accounts for more than 10% of a building's total annual energy use
- The building use accounts for more than 10% of a building's total annual CO<sub>2</sub>e emissions

Refer to our [Policies & Procedures](#) for detailed methodology

## REVIEW BOARD APPLICATION

None required

## MAY BE COMBINED WITH

- Building Portfolio

## GET STARTED

- Use the [Blended Emissions Template](#) to estimate your building's Blended Emissions Standard.
- You will be able to opt into a Blended Emissions Standard when completing reporting for your first emissions compliance year and any verification year thereafter.
- Primary uses and Blended Emissions Standards must be [Third Party Verified](#) every verification year.

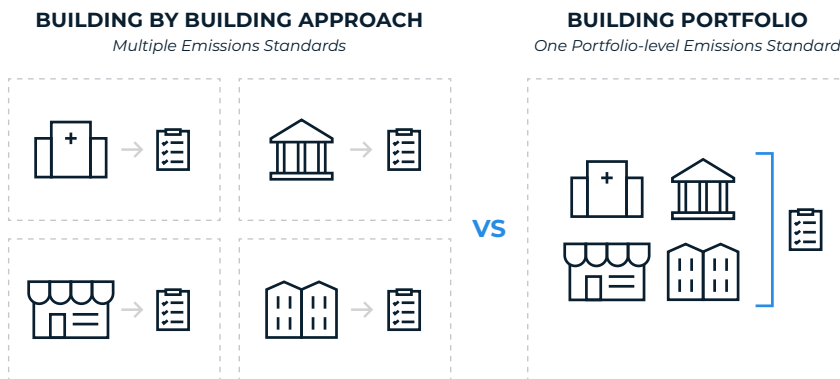
**COMPARE YOUR SINGLE BUILDING'S EMISSIONS STANDARD** [➔](#)

# BUILDING PORTFOLIO



## OVERVIEW

Building owners with multiple buildings can comply with emissions standards through a Building Portfolio. This approach replaces individual emissions limits for each building with a Blended Emissions Standard across the entire portfolio. Energy retrofits in specific buildings can help mitigate the remaining emissions in other buildings across the portfolio. This approach allows you to align emissions compliance with your capital planning, providing greater flexibility for emissions reduction planning.



## ELIGIBILITY CRITERIA

Building owners may apply for a Building Portfolio if the following is true:

- All buildings in the Building Portfolio have the same owner\* or are part of the same Institutional Master Plan.

In addition to shared ownership, building owners will be asked to demonstrate the following eligibility criteria at the time of application:

- Building uses, Gross Floor Area, and annual energy and emissions data for all buildings in the Building Portfolio have been third party verified during the last verification year.
- All buildings in the Building Portfolio are in compliance with applicable reporting, third-party verification, and emissions requirements.
- There are no vacant buildings in the Building Portfolio.

\*Building's are considered to have the same owner if they meet one or more of the following criteria in [Section XI.a.\(i\) of the Regulations](#)

## REVIEW BOARD APPLICATION

Deadline: September 1

## MAY BE COMBINED WITH

- Individual Compliance Schedules
- Hardship Compliance Plans

## GET STARTED

### BEGIN YOUR BUILDING PORTFOLIO APPLICATION [➔](#)

## PATHWAY OPTIONS

### PATHWAY ZERO

Building Portfolio only contains a group of buildings located in a single parcel that collectively sum to at least 20,000 sq. ft. or 15 units, but would not otherwise be individually subject to BERDO. All buildings meet all eligibility criteria.

### PATHWAY ONE

Building Portfolio contains a group of buildings that are individually subject to BERDO, meet all eligibility criteria, and do not require an environmental justice review.

### PATHWAY TWO

Building Portfolio contains a group of buildings that are individually subject to BERDO, meet all eligibility criteria, and require an environmental justice review.

### PATHWAY THREE

Building Portfolio contains buildings that do not meet the eligibility criteria and/or the owner is applying for an Individual Compliance Schedule for the Building Portfolio at the same time.

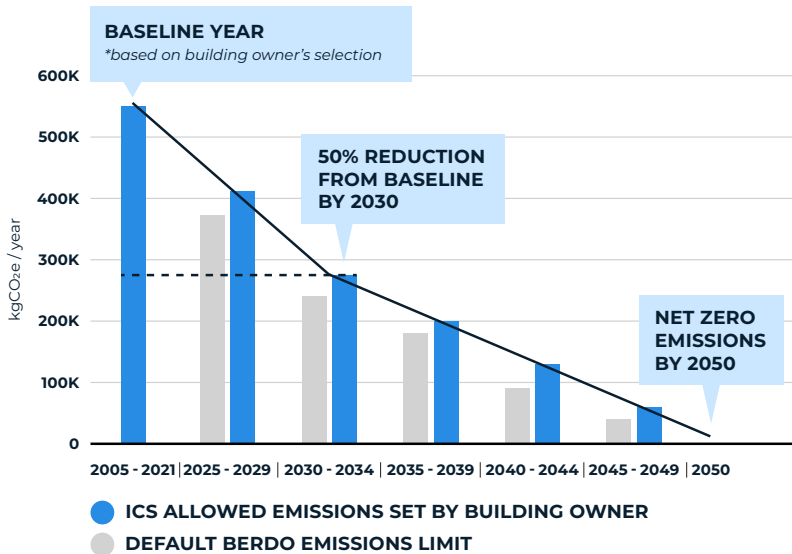
# INDIVIDUAL COMPLIANCE SCHEDULE (ICS)



## OVERVIEW

Individual Compliance Schedules (ICS) offer building owners flexibility in setting their own timeline to reduce emissions, using a chosen baseline year between 2005 and 2021. With an ICS, owners can adjust emissions limits based on their building's historical data and building operations, taking advantage of prior emissions reduction work. A building must reduce its total emissions by 50% by 2030 and 100% by 2050 from the chosen baseline year. Emissions limits\* must decline linearly or better in five year increments.

## EXAMPLE ICS REDUCTION SCHEDULE



## ELIGIBLE PRIMARY USES

Building owners will be asked to demonstrate the following eligibility criteria for each building at the time of application:

- You can provide and third-party verify the building use(s), Gross Floor Area, and annual energy and emissions data for the selected baseline year.
- Each building's total Gross Floor Area has not been reduced by more than 10%.
- Each building's largest primary use has remained the same from the baseline year to present day.
- Each building is in compliance with applicable reporting, third-party verification, and emissions requirements.

\*An absolute emissions limit is defined as (kgCO<sub>2</sub>e/year)

## REVIEW BOARD APPLICATION

Deadline: September 1

## MAY BE COMBINED WITH

- Building Portfolio

## GET STARTED

You can apply for a Building Portfolio and Individual Compliance Schedule at the same time.

## INDIVIDUAL COMPLIANCE SCHEDULE APPLICATION [↗](#)

# HARDSHIP COMPLIANCE PLANS (HCP)



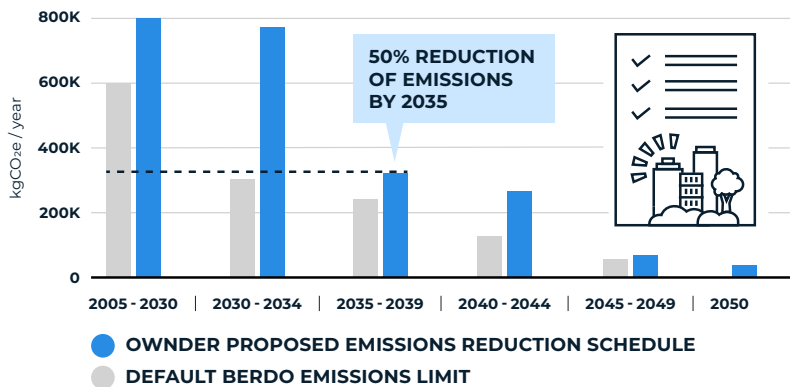
## OVERVIEW

Hardship Compliance Plans (HCP) allow building owners with eligible hardships to request alternative emissions reduction timelines and/or limits. Eligible hardships may be caused by financial, regulatory, technical, operational, or other factors affecting emissions compliance. Owners may seek short-term (1-3 years) or long-term (4+ years) relief through an HCP. Applicants for long-term HCP must describe how they can provide benefits to Environmental Justice Populations.

### ELIGIBLE HARDSHIPS INCLUDE:

- When compliance with emissions standards requires space, equipment, or electric service that is not available;
- When compliance with emissions standards significantly interfere with the ability to, or significantly increase the cost to, provide services that are critical to community health and safety; and/or
- When compliance with emissions standards creates an unreasonable difficulty on a building owner in terms of costs.

### EXAMPLE HCP REDUCTION SCHEDULE



## ELIGIBILITY CRITERIA

Building owners may apply for an HCP if **all** of the following are true:

- You are able to demonstrate the existence of one or more of the circumstances and characteristics affecting compliance described in the [regulations](#).
- You have considered all [emissions compliance](#) and flexibility options under BERDO.
- You can show, with proof, that the combination of the building's specific circumstances and characteristics and allowable compliance options create one of the three eligible hardships described above.

## REVIEW BOARD APPLICATION

Deadline: July 1 for long-term HCP\* and October 1 for short-term HCP

\*After 2024, long-term HCP applications are due on April 1.

## MAY BE COMBINED WITH

- Building Portfolio

## GET STARTED

[BEGIN YOUR HARDSHIP COMPLIANCE PLAN APPLICATION](#)

## TYPES OF RELIEF

Under any HCP, building owners must still show they are reducing emissions. Eligible relief measures include:

- Alternative emissions reduction schedule
- Alternative emissions standards
- Exemption of specified energy use(s), in whole or in part
- Adjusted compliance obligations in light of third-party barriers or delays to significant energy efficiency or electrification projects
- Additional compliance mechanisms approved by the Review Board
- Other relief the Review Board may deem appropriate on a case-by-case basis

## FLEXIBILITY MEASURES SUMMARY

### BLENDED EMISSIONS STANDARD

**Benefit:** Takes into account the mix of primary uses in your building or Building Portfolio. This allows you to have an emissions standard that better reflects your building's operations and may increase your emissions limit.

| Emissions reduction requirement  | Review Board application not required  | Can be combined with   |
|--|--|--|
| Must comply with the Blended Emissions Standard in every compliance year and achieve net-zero emissions by 2050. | Opt-in or opt-out during your first year of emissions compliance or every verification year thereafter | <ul style="list-style-type: none"> <li>Building Portfolio</li> </ul> |

### BUILDING PORTFOLIOS

**Benefit:** Offers building owners the ability to meet a portfolio-level Blended Emissions Standard across multiple buildings, rather than a building-by-building compliance approach.

| Emissions reduction requirement  | Review Board application deadline | Can be combined with   |
|--|-----------------------------------|--|
| Must comply with the portfolio-level Blended Emissions Standard in every compliance year and achieve net-zero by 2050. | September 1                       | <ul style="list-style-type: none"> <li>Individual Compliance Schedule; or</li> <li>Hardship Compliance Plan</li> </ul> |

### INDIVIDUAL COMPLIANCE SCHEDULE (ICS)

**Benefit:** Offers an alternative compliance schedule based on a building's historical emissions and operations, allowing owners to benefit from prior emissions reductions.

| Emissions reduction requirement   | Review Board application deadline | Can be combined with   |
|---|-----------------------------------|--|
| A building must reduce its total emissions by 50% by 2030 and 100% by 2050 from the selected baseline year. Emissions limits must decline linearly or better in five year increments. | September 1                       | <ul style="list-style-type: none"> <li>Building Portfolio</li> </ul> |

### HARDSHIP COMPLIANCE PLANS (HCP)

**Benefit:** Offers building owners who face hardships caused by financial, regulatory, technical, operational, and/or other constraints, the chance to comply with BERDO with alternative emissions reduction timelines and/or limits.

| Emissions reduction requirement   | Review Board application deadline   | Can be combined with   |
|---|---|--|
| Owners must propose an emissions reduction plan that fits the hardship they're facing. This may include asking for a different timeline and/or emissions limits based on their emission reduction plan. | July 1 (Long-term HCP) or October 1 (Short-term HCP) in 2024<br><br><i>*After 2024, long-term Hardship Compliance Plan applications are due on April 1.</i> | <ul style="list-style-type: none"> <li>Building Portfolio</li> </ul> |

## ADDITIONAL RESOURCES

- Understand your options with the [Building Decarbonization Guide](#)
- Review your building's emissions with the [BERDO Emissions Calculator](#)
- Reach out to [Mass Save](#) to take advantage of incentives and rebates
- How to comply with your [Berdo Emissions Standard](#)
- Review the [Ordinance, Regulations, and Policies and Procedures](#)

## CONTACT THE BERDO TEAM

**Emissions compliance:**  
[retrofit@boston.gov](mailto:retrofit@boston.gov)

**BERDO reporting:**  
[energyreporting@boston.gov](mailto:energyreporting@boston.gov)

**Application assistance:**  
[berdoreviewboard@boston.gov](mailto:berdoreviewboard@boston.gov)

**Phone:** 617-635-3850 x5

## ABOUT BERDO

[boston.gov/berdo](https://boston.gov/berdo)

**BERDO Review Board website:**  
[boston.gov/berdo-review-board](https://boston.gov/berdo-review-board)

**Pathways for Emission Reduction:**  
[boston.gov/retrofit-hub](https://boston.gov/retrofit-hub)

**CITY of BOSTON**



City of Boston  
Environment