



Senator Lisa Murkowski, Chair
U.S. Senate Committee on Energy and Natural Resources
304 Dirksen Senate Building
Washington, DC 20510

Senator Maria Cantwell, Ranking Member
U.S. Senate Committee on Energy and Natural Resources
304 Dirksen Senate Building
Washington, DC 20510

August 8, 2017

Dear Senators:

The American Institute of Architects

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Washington, DC 20006

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Thank you for your leadership in modernizing our nation's energy policies. The American Institute of Architects would like to provide feedback on the recently introduced Energy and Natural Resources Act of 2017, S. 1460. Although we support the goals of greater energy efficiency, we have concerns with language that would repeal targets for the reduction of emissions from federal buildings, as well as language that could negatively impact the codes development process.

Almost 40 percent of all US energy is consumed by buildings that produce carbon through heating, cooling and lighting and through their construction. Architects work to reduce such operational and embodied carbon production with passive design techniques, energy efficiency measures and low-impact building materials that increase human health and productivity. Architects also integrate renewable energy sources into buildings, making them more sustainable, resilient and economical. Greater efficiency, particularly in the building sector, has saved billions of dollars for both consumers and taxpayers.

That is why AIA is deeply opposed to language that would repeal goals for the federal government to increase the performance of its buildings. Section 1114 of S. 1460 would repeal Section 433 of the Energy Independence and Security Act of 2007. As you know, this provision sets targets for the reduction and eventual elimination of fossil fuel use in new and renovated federal buildings by the year 2030.

This policy is the only requirement enshrined in law that obligates the federal government to address greenhouse gas emissions from the buildings sector. As the largest landlord in the country, it is of the utmost importance that the federal government maintain its leadership in reducing the environmental impact of its buildings. Therefore, we urge you to retain Section 433 in any legislation that addresses our nation's energy policies.

The American Institute of Architects

AIA also has concerns with changes made to the codes language, as compared to the Senate-passed language contained in the Energy Policy Modernization Act during the previous Congress. In particular, we believe that the use of the term “economically justified” to replace “lifecycle cost effective” as the criteria for the Department of Energy’s evaluation of new code proposals will create a lack of clarity. This new terminology would require additional economic modeling that the DOE would not be equipped to conduct, particularly when taking into account the steep cuts proposed to its funding. Furthermore, changing DOE’s code evaluation standards will make it much more difficult to compare previous iterations of the code to future codes analyzed under the new criteria.

In addition, this legislation also fails to address stretch codes, important tools that jurisdictions may adopt to achieve higher levels of energy savings beyond the base code if they choose to do so. Previous legislation explicitly directed DOE to provide support for stretch codes, while this legislation makes no mention of these vital resources. It is critical that the federal government reaffirm its support for stretch codes.

We believe that the federal building performance and energy codes provisions in this legislation deserve additional consideration in light of reports that this bill may be fast-tracked for floor consideration, bypassing the committee process. Thank you for your consideration. We look forward to working with you to achieve the best possible energy policies for the built environment and our nation.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert Ivy". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Robert Ivy, FAIA
EVP/Chief Executive Officer