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May 21, 2019

The Honorable Frank Pallone
Chairman
Energy and Commerce Committee
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Greg Walden
Ranking Member
Energy and Commerce Committee
2322 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Pallone and Ranking Member Walden:

On behalf of the U.S. Green Building Council (USGBC), a national nonprofit representing nearly 9,000 member companies and organizations committed to cost-effective and high-performing buildings, I write to provide comments for the hearing "LIFT America: Modernizing Our Infrastructure for the Future." We commend the committee for convening this hearing. We believe that the Committee and Congress should act swiftly to help improve the condition of infrastructure, including buildings, across the country.

USGBC is dedicated to transforming the way buildings and communities are designed, built and operated, enabling an environmentally and socially responsible, healthy, and prosperous world. Best known for the successful Leadership in Energy & Environmental Design (LEED) green building certification system, we leverage our education, credentials, events, communications, and policy advocacy activities to support the public and private sectors in advancing high-performance, cost-effective buildings that save energy, water and money. Reducing the contribution of buildings to greenhouse gas emissions has been a core area of our work along with a focus on supporting local economic development and job creation.

USGBC Supports Multiple Provisions in the LIFT America Act

Many programs included in the LIFT America Act are aligned with our work in advancing high-performance cost effective building and healthier communities. USGBC supports the following sections:

- Program to enhance electric infrastructure resilience, reliability, and energy security (31101)
- Grant program for grid modernization projects (31201)
- Smart Building Acceleration (32201-32207)
- Weatherization Assistance Program (32301-32303)
- Reauthorization of clean school buses program (32501)
- Brownfields Redevelopment (50001-50002)

We wish to provide comments to enhance the effectiveness or reach of other sections included in the LIFT America Act.



Section 32101, Energy efficient public buildings:

USGBC works with state and local governments across the country on improving the operational performance of their facilities. We support the goal of the program but believe that the bill could be enhanced in a number of key ways:

- USGBC supports including water efficiency savings as part of the program. Since the original program authorization, the federal, state and local government has made impressive progress in integrating energy and water savings into facility improvements. Water efficiency should be added to maximize utility cost savings (and associated emissions savings) for public facilities, as well as to reduce potable water demand which can add to strain on water infrastructure
- USGBC supports the inclusion of third party validation of energy and water reductions as a condition of program eligibility. LEED, for example, is a widely used verification tool used by government and private sector building owners that has been a helpful method to ensure that building upgrades are designed and operating appropriately. Investor Ready Energy Efficiency (IREE) is another third party certification focused on verification of specific energy efficiency measures, and is already being used by utility companies.
- USGBC supports adding benchmarking as a condition of program eligibility. Benchmarking building performance data is a critical step for facilities managers or property owners to improve the performance of a property and maintain investments overtime. Tracking energy and water performance over time can result in low cost reductions in utility consumption and financial benefits. The U.S. Environmental Protection Agency (EPA) reports buildings that use EPA's ENERGY STAR Portfolio Manager achieve an average energy savings of 7% over three years, which is associated with significant financial savings estimated at \$120,000 to over \$4 million.¹

Energy Star Portfolio Manager should be used as a common reporting platform, but the use of other tools to provide additional analytic functions and performance comparisons should also be allowable.

Section 32102, Energy efficiency and conversation block grant:

The funding of Energy Efficiency and Conservation Block Grants (EECBG) under the Recovery Act served as an incredibly valuable resource for communities across the country to save tax payer dollars through energy conservation projects in buildings, including programs to expand the use of LEED certification. USGBC was proud to support the creation of the EECBG and believe that it can play a continued role in

¹ U.S. Environmental Protection Agency, ENERGY STAR® Portfolio Manager. Data trends – Benchmarking and energy savings. 2012 Oct available at: https://www.energystar.gov/sites/default/files/buildings/tools/DataTrends_Savings_20121002.pdf



reducing energy consumption at the municipal level. We support the program but recommend some additional improvements to the legislation.

- USGBC supports clarifying that micro-grids as well as energy storage would be eligible for use under the program as part of the distributed generation section of the bill.

Section 32601, Grants for energy efficiency improvements and renewable energy improvements at public school facilities:

In 2016 the Center for Green Schools at the U.S. Green Building Council (USGBC), the 21st Century School Fund and the National Council on School Facilities released the State of Our Schools report. The report compares historic spending levels to the investment to maintain today's school building inventory and finds a projected gap of \$46 billion the nation must overcome to provide healthy, safe, and adequate school facilities for our children and teachers.² We believe that all levels of government need to urgently help improve the condition of school facilities, including energy use, across the country.

USGBC supports the goals of the program but believe the legislation can be improved in a number of areas:

- The program should be modified to consider health and safety enhancements alongside energy efficiency and renewable energy improvements as allowable uses of grant funds. Improvements to indoor air and environments can benefit the health and safety of children and educators, and should be integrated into the implementation of an energy project.
- The application should make note of the estimates of maintenance and operations of the equipment being installed, not just the training. As a matter of best practice school districts should have a good understanding of equipment maintenance costs.
- We would also suggesting adding criteria for energy audits or having the Secretary of Energy recognize appropriate audit standards. This addition would help safeguard schools from lower quality audits and protect them from potentially poor investments.

² 21st Century Schools Fund Inc., U.S. Green Building Council Inc., and National Council on School Facilities, "State of Our Schools: America's K-12 Facilities" (Washington: 2016), available at <https://kapost-files-prod.s3.amazonaws.com/published/56f02c3d626415b792000008/2016-state-of-our-schools-report.pdf?kui=wo7vkgV0wWOLGSjxek0N5A>.



Section 34303, Model building code for electric vehicle supply equipment:

As you may know U.S. Green Building Council (USGBC), International Code Council (ICC), ASHRAE and the Illuminating Engineering Society (IES) last year released the 2018 INTERNATIONAL GREEN CONSTRUCTION CODE (2018-IgCC). The 2018-IgCC establishes minimum green requirements for buildings, providing baseline green benefits and a foundation for applying complementary voluntary systems³. Sections of 2018-IgCC include electric-vehicle charging or preferred parking for green vehicles.

- We recommend the legislation recognize the 2018-IgCC and the LEED rating system as existing resources for states and localities in achieving broader electrical vehicle and charging deployment.
- We recommend the 2018 IgCC serve as the basis for the development of model code language around electric vehicles.

Thank you for the opportunity to provide this information. Please do not hesitate to contact me if you have any questions or wish to discuss these issues further.

Sincerely,

A handwritten signature in black ink, consisting of two large, stylized '2' characters followed by a horizontal line.

Bryan Howard
Legislative Director
U.S. Green Building Council

³USGBC “LEED AND THE INTERNATIONAL GREEN CONSTRUCTION CODE” (November 2018), available at:
<https://www.usgbc.org/sites/default/files/2018%20IgCC%20Policy%20Brief.pdf>.