March 20, 2023

The Honorable Jennifer M. Granholm
Secretary
United States Department of Energy
1000 Independence Ave, SW
Washington, DC 20585

Re: DOE Docket ID No. EERE-2010-BT-STD-0031 – Clean Energy for New Federal Buildings and Major Renovations of Federal Buildings

Dear Secretary Granholm,

The American Institute of Architects (AIA) represents over 96,000 architects and design professionals. Since 1857, AIA has been committed to safeguarding the public's health, safety, and welfare and improving our nation's quality of life through design. Central to that mission is AIA's commitment to advancing climate action and equity in the built environment.

As you know, buildings currently account for 39 percent of carbon emissions. Approximately 11 percent comes from embodied carbon (the emissions generated during construction or processing, fabrication, and the transport of materials). The rest is operational carbon (the emissions generated through the building's use).

AIA applauds the Department of Energy (DOE) for issuing this supplemental notice of proposed rulemaking to move to full implementation of Sec. 305 of the Energy Conservation and Production Act (ECPA), as amended by Sec. 433 of the Energy Independence and Security Act of 2007 (EISA). AIA strongly supports the phase-out of fossil fuels in federal buildings as a necessary step to achieve decarbonization in the building sector. This action is consistent with the Biden Administration's Executive Order 14057, Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability.

As the nation's largest landowner, the General Services Administration (GSA)'s buildings portfolio has an outsized impact on the nation's building stock. The GSA owns or leases over 371 million square feet (across 8,600 buildings).[i] The Biden Administration has pledged to achieve a net-zero emissions-building portfolio by 2045 (including a 50 percent emissions reduction by 2032) and a net-zero emissions economy by 2050.[ii] This will not happen without the decarbonization of the federal government's buildings and installations.

Importantly, GSA actions significantly impact the market for building technologies and design best practices, as demonstrated success in the federal building portfolio can be replicated and scaled across the sector. It is for this reason that AIA has been steadfast in our support for the phase-out of fossil fuels, as prescribed by Sec. 433 of the EISA.

In 2007, AIA testified in support of the policy, calling for a step-down reduction in the use of fossil fuels, culminating in a full phase-out by 2030. AIA's testimony asserted:

> Requiring all new and significantly renovated federal buildings to consume significantly less fossil-fuel-generated energy is a bold idea, but one whose time has come. It would show the world and the private sector that the United States government believes that climate change is real and that aggressive action is needed in order to reverse course. It demonstrates that the AIA-recommended energy reduction targets are achievable in new and significantly renovated buildings, often through little or no additional life cycle costs.[iii]

In 2020, AIA testified again, reiterating the need to stay the course. In opposition to proposed legislation that would have repealed Sec. 433, AIA testified:

> Energy efficiency and energy sourcing are not a replacement for one another. We must address both. It is of paramount importance that buildings be built and renovated to consume less energy, and wherever possible, buildings should produce clean energy to put back into the energy grid. For those buildings that cannot (yet) generate enough power to cover their needs, the remainder must come from purchased renewable sources. This is a mathematical necessity if this Committee is going to achieve its announced goal of a zero-carbon economy by 2050. It is also more possible than ever before. We should not shy away from this target now.[iv]

DOE's announced intention to finalize a rule on the phase-out of fossil fuels is a necessary and overdue step to fully implement and meet carbon reduction targets. Coupled with the Department's work to create cleaner, more resilient energy grids, decarbonizing the building sector is an indispensable component to achieving the Administration's goals. AIA recognizes that while the federal government has an important leadership role, the decarbonization of the building sector requires action from our industry, as well.

That is why, in 2009, AIA created the 2030 Commitment, a voluntary program for architecture firms to utilize data-driven, project-specific tools to achieve carbon-neutral buildings by 2030 and to report on their progress. Firms that participate in the commitment pledge commit to achieving a designed operational energy reduction for all of their new buildings and major renovations (from a baseline of CBECS 2003 and RECS 2001): 80 percent in 2020; 90 percent in 2025; 100 percent in 2030. It sets a maximum allowance of 20 percent for off-site energy purchasing, requiring the majority of the reduction to be achieved through a combination of onsite clean (carbon pollution-free) energy generation and energy-efficient design. AIA is also pleased that the DOE-proposed definition of "fossil fuel-generated energy consumption," as it is consistent with AIA's definition for the 2030 Commitment – and is (and will be) what AIA continues to advocate.

The AIA 2030 Commitment has doubled in signatories in the past five years, now representing over 56,000 architecture/ engineering/ construction professionals, 20,652 projects, and over 1,200 firms. The most recent report on the 2030 Commitment is available here. AIA will continue to promote this program, as well as provide continuing education and other resources for architects to support their work toward the achievement of a zero-carbon built environment.

AIA stands ready to assist in the implementation of this important policy. As DOE moves forward with finalizing the rule, please contact me if you need additional information. Again, we remain supportive of your efforts.

Sincerely,

Sarah Dodge
Senior Vice President of Advocacy + Relationships

cc: Mr. Jeremy Williams, U.S. Department of Energy, Office of Energy Efficiency and Renewable Energy, Buildings Technologies Office

[i] General Services Administration (GSA), "GSA Properties: Overview," https://www.gsa.gov/real-estate/gsa-properties

[ii] Executive Order 14057, "Executive Order on Catalyzing Clean Energy Industries and Jobs Through Federal Sustainability," December 8, 2021, https://www.whitehouse.gov/briefing-room/presidential-actions/2021/12/08/executive-order-on-catalyzing-clean-energy-industries-and-jobs-through-federal-sustainability/

[iii] RK Stewart, FAIA, 2007 AIA President, Testimony on behalf of the American Institute of Architects (AIA), "Energy Efficient Federal Buildings," Senate Committee on Energy and Natural Resources, Subcommittee on Energy Hearing, February 12, 2007 https://web.archive.org/web/20070715141644/http:/www.aia.org/SiteObjects/files/RKStewart_WrittenTestimony_SenateEnergy.pdf

[iv] Julie Hiromoto, FAIA, Testimony on behalf of the American Institute of Architects (AIA), "Saving Energy: Legislation to Improve Energy Efficiency and Storage," House Energy & Commerce Subcommittee on Energy, Legislative Hearing, February 12, 2020 https://congress.gov/116/meeting/house/110516/witnesses/HHRG-116-IF03-Wstate-HiromotoJ-20200212.pdf