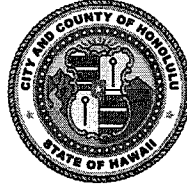


OFFICE OF CLIMATE CHANGE, SUSTAINABILITY AND RESILIENCY

CITY AND COUNTY OF HONOLULU

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February 21, 2023

The Honorable Tommy Waters
Chair and Presiding Officer
and Members
Honolulu City Council
530 South King Street, Room 202
Honolulu, Hawaii 96813

Dear Chair Waters and Councilmembers:

SUBJECT: Bill 4 (2023), Relating to the Adoption of the State Energy Conservation Code

The Office of Climate Change, Sustainability and Resiliency ("CCSR") strongly supports Bill 4 (2023), which adopts the State Energy Conservation Code (2018 International Energy Conservation Code ["IECC"]) with local amendments. In December of 2020, the Hawai'i State Building Code Council unanimously approved the 2018 IECC, with amendments, as the Hawai'i State Energy Code. Per state law, the City is now required to update its own Building Energy Conservation Code ("Energy Code") to the State Energy Code with any local amendments applicable to O'ahu's unique development context.

Balancing climate action and affordability is essential to address multiple City goals regarding housing, business recovery, and climate change. The City is taking steps to support existing buildings including tracking energy use in City and large private buildings (i.e, Benchmarking Ordinances 20-47 and 22-17¹, respectively); accessing and communicating out the generational resources of the federal Inflation Reduction Act²; and investigating opportunities to establish an affordable housing retrofit program to support investments and energy costs savings.

For new construction, the City's science-based, Council-adopted Climate Action Plan states that the most important long-term measure to drive energy efficiency and reduce carbon pollution is to regularly update "building energy codes to the highest national and state standards."³ Although widely understood as a modest update from the previous code, the U.S. Department of Energy reviewed the 2018 IECC and determined the updated edition would improve energy efficiency in new

1 Ordinance 20-47, Section 2-_4 Building energy benchmarking: <https://hnlldoc.ehawaii.gov/hnlldoc/document-download?id=9213#page=5>; Ordinance 22-17, Relating to Building Benchmarking: <https://hnlldoc.ehawaii.gov/hnlldoc/document-download?id=14729>.

2 The Inflation Reduction Act (2022): <https://www.resilientoahu.org/ira>

3 *One Climate One O'ahu*, City and County of Honolulu Climate Action Plan 2020-2025, Strategy 5: Reduce Energy Demand by Increasing Energy Efficiency: <https://www.resilientoahu.org/s/2020-2025-Climate-Action-Plan.pdf#page=74>.

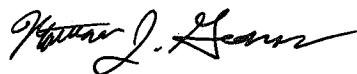
The Honorable Tommy Waters
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February 21, 2023
Page 2

buildings subject to the code compared to the previous 2015 edition (the City's current code)⁴. The local amendments proposed in Bill 4 additionally encourage market leadership toward even greater efficiency specific to O'ahu's context, while ensuring new buildings remain affordable and comfortable to live in. The proposed local amendments also offer simplifications to code requirements where possible to maintain flexibility in design and construction.

The proposed local amendments were developed through an inclusive and transparent process. In coordination with the Department of Planning and Permitting, CCSR engaged over 60 individuals from roughly 40 different organizations in the construction, development, union, and other relevant industries. We also held three workshops, attended by over 75 participants, on the potential proposed local amendments to allow for broad public review and input. CCSR is committed to continued stakeholder engagement beyond this code update to further explore incentives in support of market innovation and to materialize the wealth of federal resources that can directly benefit the City, private developers, building owners, and tenants in achieving the latest code's objectives and further energy costs savings.

Energy use in buildings accounts for roughly a quarter of O'ahu's greenhouse gas emissions. How our buildings perform and are designed to use energy is also inextricably linked with long-term costs and savings for a building's occupants. It is essential to ensure our Energy Code is up-to-date as proposed by Bill 4 in order ensure public health and safety, improve energy efficiency, and increase energy and cost savings for long-term affordability for our residents. Thank you for the opportunity to provide these comments in support of Bill 4 (2023). Should you have any questions, please feel free to contact me at (808) 768-2277 or via e-mail at resilientoahu@honolulu.gov.

Sincerely,



Matthew Gonser
Executive Director and
Chief Resilience Officer

Digitally signed by Gonser,
Matthew
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APPROVED:



Michael D. Formby
Managing Director

⁴ *Determination Regarding Energy Efficiency Improvements in the 2018 International Energy Conservation Code (IECC)*. Department of Energy, Energy Efficiency and Renewable Energy Office:
<https://www.regulations.gov/docket/EERE-2018-BT-DET-0014>.