

Comments from AIA Seattle:

**Supporting state legislation:** As you know, AIA and a host of environmental groups are supporting legislation at the state level to support 2030 goals. I know that group would love to count the city among its supporters.

**Code:** Embedding 2030 energy targets in code is a favored option by most architects, but education is a real concern. We already have trouble meeting our members' needs for code education, and there's a serious lack of expertise available for training. If the city upgrades the code requirements (which it should), we urge you to provide trainers or education modules so that our members can get the training they need. AIA is happy to deliver code education if we have access to qualified trainers.

**Incentives:** In addition to providing financial support for deployment of new energy technologies, any incentive package should address a couple of core issues: conferring the benefits of energy savings to the investor that incurs the cost, and incentivizing development of good habits in the operation of new buildings. Feebates have good potential to do this, although word so far on the Portland program is mixed. Another good option might be the California model of monitoring energy performance for the first 3 months of operation, extrapolating from that a 5-year estimated energy savings value, paying the investor/developer those savings up front, and recouping them by charging the end user the full standard energy cost for 5 years.

**System-level initiatives:** Obviously, carbon emissions cannot be arrested at the building level alone, and our constituency favors mechanisms that favor better land use and make prices tell the true environmental cost of energy. The city should continue to consider mechanisms like density bonuses, high incremental energy prices, and distributed heat and energy as important components of an overall carbon reduction strategy.

To be successful, Washington state legislation should have 4 components:

## **Energy Code**

In order to achieve our first carbon reduction goal (60% by 2010), our current Energy Code needs to be 20 to 30 percent more efficient. For years the Washington State Energy Code was considered to be one of the best energy savers in the country. Not anymore. Four states have already passed upgraded their energy codes to support 2030 goals: New Mexico, Illinois, Minnesota and most recently California. And the federal government will likely adopt the progressive ASHRAE 189 standard for all Federal Buildings.

*We propose legislation that adopts ASHRAE 189 as the new Washington State Building Energy CODE standard.*

## **Incentives**

Effective legislation must also provide incentives for buildings that exceed the new energy standard, an inexpensive way to encourage pioneering achievement in energy reduction. The state of California currently provides hundreds of millions of dollars in energy reduction incentives every year, as an investment against the high costs of energy and pollution. Possible incentives for Washington legislation include sales tax reduction on construction, B&O tax reductions, or rebates paid through the utility companies. Incentives can encourage technological advancement when the State cannot afford to finance R&D.

*We propose legislation that offers rewards for successful verified energy reductions.*

## **Upgrades for Existing Government Buildings**

New buildings are only part of the solution. A big part of the solution lies in improvements existing building stock. Public entities need to lead by example. Private sector upgrades might be supported through financial incentives for developers.

*We propose Washington State legislation that requires all State, City, County and other taxing authorities to energy upgrade their buildings to achieve incremental 2030 targets.*

## **Education**

Architects need the skills and knowledge to successfully design for 2030 goals. There are many architects that want to encourage their clients to provide cutting edge energy-saving technologies, but they do not know how. Education is a critical part of the solution. 2030-based legislation in Minnesota funds professional education through a cap-and-trade system.

*We propose legislation that includes funding for professional education. We need to educate ourselves together.*

\* -CODE - definitely support code as a basic mechanism of pushing change into the marketplace. Like the longterm focus on performance based. But big concerns that the code changes are not completely aligned with proposed state changes, creating a potentially fragmented and confusing design environment. Here's what I hear from our state legislative task force: As described, the City energy code is different than the State. A person should be able to use the same assumptions for building design in any county in Washington and meet the energy code and the 2030 challenge (as interpreted by the State). Align with the Climate Action Team Recommendations; Align its energy reducing goals with the Efficiency First bill that is currently working its way through the state legislature; Have its metrics and measurements align with those of Efficiency First and other state metrics; Align the City of Seattle Energy with the Washington State Energy code and its future updates. The City has energy saving goals monitored system wide and then requirements on building that change from building type to building type. The City and the State need to use the same ways to measure and adjust the energy codes. In addition the State needs to align with the International Energy Code (adopted by 38 states currently). The energy use for a building is also dependent on energy generation on a building site and the utilities ability to use non fossil fuel power generation. I believe the people at the City understand this but their summaries do not show a realistic attempt to align all of these.

\* -financial and price mechanisms - we would have liked to see more creative financial mechanisms make the final cut of recommendations, and in particular mechanisms that help front load the gains from efficiency investments to incentivize investment from developers. An example would be the California utilities program that pays out a 5-year estimate of energy savings to the developer and recoups the money by charging the end user with what would have been the full utility load for those 5 years.

\* -innovation review board - strong support in principle, but some concerns about how hard it might be and the unpredictability of outcomes, and questions about whether projects would actually take advantage of it given those limitations. Some concern that a financial incentive is needed to offset cost of extra process.

Questions:

\* -multifamily - How did large scale multifamily come to be defined as anything above 4 units?

\* -neighborhood energy strategies - Is this idea linked to the work Steve Antupit and others have been doing at the state level with climate benefit districts?

Places to partner: there were several recommendations which had significant overlap with existing or planned AIA efforts, and I wonder if there are some opportunities to collaborate. The opportunities I immediately noticed were:

\* -EDUCATION - clearly we have a shared interest with the city in educating architects about any code changes, as well as the skills to reach the stretch goals and the knowledge to easily adopt the expedited permitting. At AIA, we have huge difficulty finding instructors for code classes in particular; if the city is going to be making regular updates to energy code in our march toward 2030, we are going to need some serious support with instructors for our community to get up to speed.

\* -green collar jobs - we've put this on our priority advocacy list for the year

\* -recognition - is there any way to align or integrate this with our What Makes It Green? Program in April?

\* -performance monitoring - there's a HUGE need in our field to get real performance info out there, even when it falls short of performance goals. We would love to provide more concrete case studies that compare modeled vs actual performance as a way of supporting advanced learning. We'd love to partner on case studies in our magazine, programs, tours, etc to really get the most out of this performance information. And with new buildings, it would be very helpful to report modeled performance along with actual to start to build a knowledge base about whether we're actually reaching out goals. Most architects stop at modeling and never even pay attention to how the building performs after they leave; we could use support in changing this.

Thanks again for all your hard work to keep our city in the forefront of sustainable development, and thank you for the opportunity of participating in this task force.