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A Climate Opportunity in Existing Federal Buildings and Facilities

In developing future policies and executive orders addressing energy use in federal buildings, the undersigned organizations encourage the Biden Administration to include policies that implement new requirements for all building alterations and to align those policies with existing requirements applicable to buildings owned and operated by the private sector. The current energy efficiency requirements that apply to alterations in existing federal buildings are neither as comprehensive nor complete as the requirements under national model building energy codes such as the International Energy Conservation Code and ASHRAE Standard 90.1. This results in higher than necessary energy costs and greenhouse gas emissions, but also creates an opportunity for federal leadership.

For more than two decades, the model building energy codes that apply to state, local and privately owned buildings have set requirements for energy-efficient alterations in existing buildings. Conversely, the Federal Building Energy Standard (10 CFR 433), which is essentially the building energy code for federal buildings, was never updated to reflect these changes and still applies only to new construction. Also, the patchwork of federal guidance on this topic would benefit from better consistency and clarity. For example, there are many common, lower-cost building alteration projects that have a significant impact on building energy-efficiency (e.g., roof replacements, mechanical insulation) that appear to fall outside of the scope of the General Services Administration’s 2018 P100 Facilities Standards. To address energy waste and greenhouse gas emissions more comprehensively in existing buildings, all alterations should comply with the requirements of ASHRAE Standard 90.1 (or other equivalent codes) regardless of project size.

Over 50% of existing commercial buildings were built before the widespread adoption of building energy codes. In fact, the first building energy standard for federal buildings was not implemented until 1989 and was considerably weaker than current standards. Older buildings, built to relatively weak standards or no standard at all, offer a tremendous opportunity for energy savings and greenhouse gas emission reductions. The most cost-effective time to take advantage of this opportunity is during the regular replacement of building components at the end of their service lives. While certain opportunities are addressed under existing policies such as the federal government’s use of energy savings performance contracts, many building alterations fall outside of current practices. A more comprehensive policy to improving building energy efficiency in existing federal buildings is required.
The undersigned organizations represent domestic manufacturers and installers of insulation products used to improve the performance of residential and commercial buildings as well as industrial facilities.

Sincerely,

Cellulose Insulation Manufacturers Association
EPS Industry Alliance
Extruded Polystyrene Foam Association
High Performance Insulation Professionals
Insulation Contractors Association of America
National Insulation Association
North American Insulation Manufacturers Association
Polyisocyanurate Insulation Manufacturers Association
Spray Polyurethane Foam Alliance

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