May 6, 2022

The Honorable Radiant Cordero, Chair  
and Members  
Committee on Transportation, Sustainability and Health  
Honolulu City Council  
530 South King Street, Room 202  
Honolulu, Hawaiʻi 96813

Dear Chair Waters and Councilmembers:

SUBJECT: Bill 22 (2022), CD1 – Better Buildings Benchmarking Program

The City and County of Honolulu’s (“City”) Climate Change Commission ("Commission") strongly supports Bill 22 (2022), CD1, which establishes a Better Buildings Benchmarking Program and energy and water usage reporting requirement for large buildings within the City.

Building benchmarking is Resilience Action 21 in the Oʻahu Resilience Strategy1 and Action 5.3 in the City’s Climate Action Plan2. Benchmarking allows owners and occupants to understand their building’s performance relative to similar buildings and helps identify opportunities to cut energy and water waste and save money.

Today, the building sector is the largest consumer of energy on the island; it accounts for roughly 35% of the island’s total greenhouse gas emissions. Energy is also one of the highest ongoing costs to building owners and renters, with Oʻahu residents burdened with utility rates roughly two to three times above the national average. Implementing a benchmarking program on Oʻahu is expected to lower energy use, reduce operating expenses for local building owners and tenants, and decrease greenhouse gas emissions island-wide.

Benchmarking and transparency is already a well-used practice. In 2017, almost 300 buildings on Oʻahu were benchmarked in ENERGY STAR Portfolio Manager, representing more than 27 million square feet of floor area from office, multifamily, hotel, retail, and other commercial and residential settings. Across the country, more

1 https://resilientoahu.org/resilience-strategy.  
than 40 municipalities have already implemented benchmarking and transparency programs for public, commercial, and multifamily buildings.

The proposed program will not require buildings to implement efficiency improvements, audits, or retrofits. While the City encourages voluntary action among buildings to realize greater energy savings, this program would only require benchmarking and reporting data annually. In addition, his program does not establish any type of performance standard. Buildings will not be penalized based on their energy efficiency or for performing below other efficient buildings island-wide.

In conclusion, the Commission thanks Chair Cordero and members of the Committee for proposing Bill 22 and stands with you in advancing Honolulu’s goal of carbon neutrality by 2045. Thank you for the opportunity to submit comments in Support of Bill 22 (2022), CD1. The Commission urges you to support passage of the bill.

Should you have any questions, please feel free to contact the Commission via email at ccc@honolulu.gov.

Sincerely,

Charles Fletcher, PH.D., Chair
Climate Change Commission