

From: [EDC](#)
To: [Freedman, Andrea](#)
Subject: FW: Clean Wisconsin Written Comments on File No. 75280
Date: Tuesday, February 14, 2023 2:44:47 PM
Attachments: [City of Madison Benchmarking Ordinance Clean WI Written Comments.pdf](#)

From: Erik Kanter <ekanter@cleanwisconsin.org>
Sent: Tuesday, February 14, 2023 11:48 AM
To: EDC <EDC@cityofmadison.com>
Subject: Clean Wisconsin Written Comments on File No. 75280

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Good morning,

Ahead of tomorrow's EDC meeting, I am submitting written comments on behalf of Clean Wisconsin in support of the committee's recommendation for approval of File No. 75280 regarding establishing a building energy savings code (agenda item 2).

Please let me know if you have any questions or additional information.

Thank you,

Erik

Erik Kanter
Government Relations Director
Clean Wisconsin
608-251-7020 x30
ekanter@cleanwisconsin.org



February 14, 2023

RE: Written Comment in Favor of the City of Madison Building Energy Savings Code, File #75280

Clean Wisconsin is a non-profit environmental advocacy organization working on clean water, clean air and clean energy issues. We were founded over fifty years ago and have over 30,000 members and supporters around the state. We employ scientists, policy experts and attorneys to protect and improve Wisconsin's environment.

Clean Wisconsin supports File #75280 to create a Building Energy Savings Code in the City of Madison. Annual energy benchmarking and regular building tune-ups are important and proven tools in reducing total carbon emissions.

Building emissions are a significant contributor to climate change. According to the EPA, commercial and residential buildings contribute approximately 13% of total greenhouse-gas emissions in the United States.¹ As identified in File #75280, commercial buildings alone contribute to approximately 30% of emissions in Madison--over double the rate of emissions from commercial *and* residential buildings combined nationally.²

Madison needs to address this significant disparity, and the initiatives detailed in the proposed Building Energy Savings Code have successfully reduced building emissions in other cities.

For instance, New York City has a similar benchmarking requirement for buildings over 25,000 square feet. According to analysis conducted by New York-based nonprofit Urban Green Council, total carbon emissions from affected buildings has decreased 23% since the law went into effect.³ The program has been so successful that the city is now considering a similar requirement for buildings over 10,000 square feet. Since adopting its own benchmarking law, Chicago has reported a 25% decrease in carbon emissions from affected buildings.⁴

Building tune-ups are also an important energy-saving strategy. By routinely evaluating and adjusting buildings' energy and HVAC systems, tune-ups ensure those systems operate at optimum efficiency. According to the City of Seattle, which enacted a tune-up ordinance in 2017, buildings that regularly undergo tune-ups should generate an average of 10-15% in energy savings.⁵

¹ <https://www.epa.gov/ghgemissions/sources-greenhouse-gas-emissions>

² <https://madison.legistar.com/ViewReport.ashx?M=R&N=Text&GID=205&ID=5173419&GUID=22E972A9-08AC-4F97-B792-8F9FC414EAF0&Title=Legislation+Text>

³ <https://www.habitatmag.com/Publication-Content/Green-Ideas/2022/2022-December/Benchmarking-the-Incredible-Shrinking-Law>

⁴ https://www.chicago.gov/content/dam/city/progs/env/EnergyBenchmark/2020_Chicago_Energy_Benchmarking_Report.pdf

⁵ <https://www.seattle.gov/environment/climate-change/buildings-and-energy/building-tune-ups/about-building-tune-ups>

634 W. Main St. #300, Madison, WI 53703
608-251-7020 | www.cleanwisconsin.org



As we all know, there is no single policy proposal that can eliminate carbon emissions and solve the climate crisis. Governments of all types and sizes need to employ a number of policies that address emissions from buildings, industry, transportation and power generation. Madison is a state leader in doing its part to address the climate crisis through a pragmatic “all of the above” strategy, and this legislative proposal furthers the city’s commitment to that strategy.

Clean Wisconsin thanks the authors for introducing this proposal. We urge the common council to pass this necessary legislation swiftly.

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