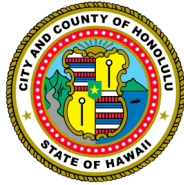


CLIMATE CHANGE COMMISSION  
**CITY AND COUNTY OF HONOLULU**

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March 24, 2023

The Honorable Matt Weyer, Chair  
and Members  
Committee on Housing, Sustainability and Health  
Honolulu City Council  
530 South King Street, Room 202  
Honolulu, Hawaii 96813

Dear Chair Weyer and Councilmembers:

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

The City and County of Honolulu (“City”) Climate Change Commission (“Commission”) strongly supports Bill 4, which updates the City’s Building Energy Conservation Code to the State Energy Conservation Code (2018 International Energy Conservation Code [IECC]) with local amendments.

The window to integrate climate action strategies into the building sector is rapidly closing if additional measures to abate carbon emissions from existing fossil fuel systems are not taken today. Building energy codes are foundational tools for members of the building industry as they establish a minimum standard of care on the efficient use of energy in buildings. However, as the impacts of climate change affect the well-being of our communities, it is essential for building energy codes to respond appropriately by incorporating measures that are responsive to our changing climate. The City’s Climate Action Plan states that regular adoption of building energy codes, particularly the most-up-to-date standards, is one of the most important long-term measures to meeting the City’s 2045 carbon emission targets. The City’s 2018 IECC with local amendments incorporates the measures that are not only responsive to community concerns for equity and economy, but strategic in their approach to mitigate energy use and increased heat in buildings. Such strategies include:

- Maintaining the City’s existing requirements for electric vehicle (EV) readiness for both residential and commercial buildings and solar PV readiness for residential buildings.
- Avoiding increased heat gain and temperatures in commercial and

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and Members  
March 24, 2023  
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residential buildings by providing exceptions to mass walls that meet a minimum high solar reflectance performance value and/or provide sufficient shading through overhang protection.

- Mitigating greenhouse gas emissions from large residential homes by increasing energy performance requirements.

Cities across the nation are recognizing the synergy between building energy codes and decarbonization by adopting more advanced provisions as part of their local code adoption process to accelerate carbon emission reduction strategies. The City is amongst those leaders and the Commission commends the City for incorporating Appendix CB, Honolulu Stretch Code – Commercial into the local amendments. As an optional code compliant pathway, the Honolulu Stretch Code will increase the rate at which buildings improve their minimum energy efficiency performance by establishing energy efficiency reduction targets by building occupancy use over a common industry baseline. This will not only drastically reduce greenhouse gas reduction in the building sector near-term, but it will also provide an additional element of integrated community resiliency by incorporating provisions for grid integrated buildings and energy storage system readiness. Buildings that choose to integrate with the utility energy grid through the incorporation of demand responsive control systems and water heaters, will help to stabilize the energy grid service to the larger community by allowing for flexible load shifting opportunities when demand is needed and supporting peak load reduction when demand is high.

Thank you for the opportunity to submit comments in support of Bill 4 (2023). Should you have any questions, please feel free to contact the Climate Change Commission at [ccc@honolulu.gov](mailto:ccc@honolulu.gov).

Sincerely,

Rosanna ‘Anolani Alegado, Ph.D.  
Chair