

AGRICULTURAL ADVISORY COMMITTEE

April 14, 2022

Gabe Albornoz, President Montgomery County Council 100 Maryland Avenue Rockville, MD 20850

Dear Council President Albornoz: Final Reading-Bill 16-21 Environmental

Sustainability - Building Energy Use Benchmarking

and Performance Standards - Amendments

On behalf of the Montgomery County Agricultural Advisory Committee, we would like to provide the following input regarding Bill 16-21: Environmental Sustainability – Building Energy Use Benchmarking.

In our previous letters addressed to the Transportation and Environment Committee, we requested an amendment to the bill to exclude all existing and new agricultural buildings from the bill.

Other states have established a precedent for excluding agricultural buildings. For example, in 2019, Washington State, House Bill 1257, included an exemption for "agricultural structures". "Agricultural structure" means a structure designed and constructed to house farm implements, hay, grain, poultry, livestock, or other horticultural products, and that is not a place used by the public or a place of human habitation or employment where agricultural products are processed, treated, or packaged.

- Benchmarking measures efficiency by comparing a building's energy efficiency to buildings with similar functions. Its value relies heavily on access to comparable buildings to provide useful data. Two immediate problems arise with this strategy for agricultural buildings:
 - The Energystar Portfolio manager, used for most benchmarking in the United States, has 18 broad categories of buildings and over 80 subcategories. Not one of them is appropriate for agricultural buildings. Including agricultural buildings in this national standard would require development of a new modeling category not previously contemplated. Without an adequate sample size of buildings with similar energy footprints for comparative purposes, benchmarking is not useful. Currently, there is no national standard for collecting this data.



- o In Montgomery County, there approximately 11 buildings with agricultural use designations that exceed 25,000 square feet. Most if not all of those are substantially unconditioned space. If only the percentage of the building with conditioned space was taken into consideration, it is likely that none of those buildings would reach the 25,000 thresholds. Additionally, 11 buildings of diverse use (as agriculture tends to be) do not provide an adequate sample size for any relevant data analysis and comparison.
- The last readily available Commercial Building Energy Consumption Survey is 2018. In that report, published by the US Energy Information Administration, of the 5,918 buildings listed in Table B15, there is NO "principal building activity (expanded)" category that shows agricultural buildings so effective benchmarking cannot be done until each unique agricultural building is modeled.
- Agriculture consumed only 1.74% of total US primary energy consumption in 2014 (and that includes all agricultural processes, not just buildings). The county's focus on commercial and multi-family buildings that produce the most demand and provide the best comparative data set is the best practice nationally.
- Looking at the energy use of one of the 11 buildings on the Montgomery County list of agricultural buildings over 25,000, the average use, because of the very limited energy demands of the building, is approximately \$402 per month so there is little savings value that could be generated from a complicated benchmarking effort that would cost more for data collection and presentation than savings that could be generated.

We thank the County Council for this opportunity to present our views on Bill 16-21 Environmental Sustainability - Building Energy Use Benchmarking and Performance Standards.

Sincerely,

Doug Lechlider, Chairman

Doug Reelle

Cc: Ludeen McCartney-Green