



July 15, 2019

Peter T. Gaynor, Acting Administrator  
Federal Emergency Management Agency  
500 C Street, SW  
Washington, DC 20024

RE: Federal Mitigation Projects through the Building Resilient Infrastructure and Communities (BRIC) Program

Dear Acting Administrator Gaynor:

I am writing on behalf of the Business Council for Sustainable Energy (BCSE) regarding the Federal Emergency Management Agency's (FEMA) development and implementation of the Building Resilient Infrastructure and Communities (BRIC) Program under the Disaster Recovery and Reform Act (DRRA), P L. 115-254.

The BCSE worked with our business and trade association members and other partners, including the National Association of State Energy Officials (NASEO),<sup>1</sup> US Green Building Council (USGBC),<sup>2</sup> Alliance to Save Energy (ASE) and others, to advocate for enactment of the DRRA during the 115<sup>th</sup> Congress, including the authorization of the six percent set aside of disaster relief funds, which is now to become the BRIC program. We are pleased to see FEMA move to implement the BRIC program and encourage its use to help communities across the U.S. to deploy innovative energy programs and infrastructure that is clean and resilient.

BCSE is a coalition of companies and trade associations from the energy efficiency, natural gas and renewable energy sectors. It includes independent electric power producers, investor-owned utilities, public power, manufacturers, commercial end users and service providers in energy and environmental markets. Founded in 1992, the coalition's diverse business membership work to build a strong economy and clean, safe, resilient and affordable energy systems.

BCSE is pleased to also have an independent initiative under its banner, the Clean Energy Business Network (CEBN). CEBN represents small- and medium-size businesses providing clean energy technologies and services. Together, BCSE and CEBN represent a broad range of the clean energy economy, from Fortune 200 companies to small businesses working in all 50 states. As diverse coalitions, not all BCSE and CEBN members endorse or take positions on the issues discussed in this letter.

As FEMA implements the BRIC program and as the Agency funds projects through the program, the Agency should recognize the following:

**1. *The Energy System Is Critical Infrastructure***

Reliable and secure energy systems power the U.S. economy and sustain other critical infrastructure systems. In particular, transportation, water, waste, and the built environment overlap significantly with energy. Please go [here](#) to

<sup>1</sup> Please see NASEO's comments on BRIC [here](#):

<sup>2</sup> Please see [USGBC's Greenspace for Good: Using the Sites System to Advance Resilience](#) website for more information

see examples of the types of projects FEMA should consider as it develops guidance for project eligibility under the BRIC program.

## **2. Federal Infrastructure Investments Should Consider Multiple Objectives**

Municipal facilities are generally long-term investments, including assets in the transportation, lighting, water, waste, and energy sectors which provide vital services to their communities. Criteria for federal investments in municipal infrastructure—through the BRIC program—should consider multiple objectives, and should reflect overarching objectives, including resource efficiency, consumer savings, environmental performance, resilience, and sustainability. Projects should optimize design, construction, and operation for resilience, and should incorporate—to the extent possible—the use of third parties to ensure that projects meet their performance objectives. An interdisciplinary approach should be utilized.

## **3. Integrate Micro-grids and Community Renewable Grids**

Efforts should be made to integrate micro-grids and community renewable grids, where applicable, to enhance further resilience and access to energy when certain portions of the grid are disabled. FEMA should consider prioritizing funding for States and municipalities that have established regulatory regimes for microgrids. In addition, planning to ensure that shared public infrastructure can be operational is needed. Features such as on-site energy generation that does not require extended fuel delivery chains, or which have locally sourced feedstock, should be utilized. This could include relying more heavily on on-site renewable energy, municipal renewable infrastructure, and natural gas along with energy storage.

The Agency should leverage the resilience expertise, lessons and performance outcomes that can be learned from states such as Florida, Texas, New Jersey, New York, Louisiana, Hawaii and Alaska. Projects should utilize a public-private approach that engages state and local government experts and private sector experts to provide communities with technical assistance, input, and ideas on a peer-exchange basis to learn from and leverage innovative technologies and approaches used in other states.

## **4. Modern Building Codes Return Benefits to U.S. Taxpayers**

The DRRRA recognized that modern building codes help to avoid casualties, property damage, business interruptions, and insurance costs in times of extreme weather events.

Building to the latest codes returns benefits over the lifetime of the building that far exceed the initial costs of construction. For example, the National Institute of Building Sciences' recent *Natural Hazard Mitigation Saves* study<sup>3</sup> demonstrates that modern codes can return a benefit of \$11 for every \$1 invested.

Importantly, these codes and standards are developed in transparent, consensus-based processes that incorporate the expertise from a diverse set of stakeholders. The requirements are evaluated for both technical feasibility and cost effectiveness. Including requirements for current codes and standards, including energy codes, in projects funded through the BRIC Program would help ensure a better end-product and represent proper stewardship of taxpayer dollars.

Maximum building efficiency allows lower amounts of energy during disruptions to maintain critical functions such as communications, refrigeration, and in-building medical equipment.

The federal government should provide the “floor” for building codes while states and localities can go beyond that floor as the local community determines, through stretch codes or third-party rating systems.

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<sup>3</sup> On the web at <https://www.nibs.org/page/mitigationsaves>

## **5. Enable Transportation System Resilience Through Use of Alternative-Fueled Vehicles**

The Agency should advance transportation system resilience through the inclusion of propane, natural gas, electricity, and fuel cells for emergency and disaster recovery fleets and appropriate charging or refueling infrastructure. A number of states and cities are already taking steps to diversify some critical vehicle fleets to ensure capabilities during petroleum disruptions. Similarly, New Jersey has taken steps to utilize micro-grids for some mass transit applications that may need to function for evacuations during emergencies.

From a public safety perspective, dedicated on-site hybrid renewable energy systems for lighting, intersection and railway signal lights, railway crossings, and draw bridges, can insure traffic and railway operation during major power disruptions.

## **6. Ready for Resilience Case Studies Demonstrate Innovative Approaches**

In buildings, campuses, micro grids, and cities, multiple energy technologies are being used to enable more efficient production, distribution, and use of energy, with information and communications technology (ICT) being a key bridge to the integration of technology and energy management.

The project examples mentioned earlier and found again [here](#) demonstrate innovative, clean and resilient approaches that will improve the reliability and operability of electricity when grid disruptions occur, and which will reduce power transmission losses in the communities where they are deployed. Many states and localities will need technical expertise to deliver these innovative technologies and the Business Council for Sustainable Energy would be pleased to work with the Agency to demonstrate the latest examples and best practices to communities through community workshops or outreach.

The Council has already been working in partnership with other organizations (Business Council for Sustainable Energy, Smart Cities Council, Qualcomm, National Association of State Energy Officials, and Texas A&M) to develop long-term community resilience through workshops in Texas and Puerto Rico. The project, called *Ready for Resilience*, has been aimed at developing Smart Technology Roadmaps for these regions. Community leaders, stakeholders, and technology partners have been convened to discuss regional project directions, partnerships and funding opportunities to build more resiliently. Please see information on the *Ready for Resilience Project* below.<sup>4</sup>

We appreciate your consideration of these case studies and of our views. Please feel free to reach out to me or to Ruth McCormick of the Council's staff at [rmccormick@bcse.org](mailto:rmccormick@bcse.org) to discuss the Council's work further.

Sincerely,



Lisa Jacobson, President  
Business Council for Sustainable Energy

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<sup>4</sup> For more information on *Readiness for Resilience* please go [here](#):