

Interagency Commission on School Construction
200 West Baltimore Street
Suite 200
Baltimore, MD 21201

Dear Interagency Commission on School Construction:

Thank you for considering our testimony concerning the need to adopt updated life-cycle cost analysis documents as required by HB458. Climate Parents is a campaign to reduce climate change-causing pollution in our schools, and our group is active in Prince George's County. In particular, we recently worked directly with Prince George's County Public Schools (PGCPS) technical staff, elected officials, and other advocates to develop a Climate Change Action Plan for PGCPS as part of a focus work group created by the Board of Education.

During the 2023 General Assembly session, the Maryland General Assembly passed HB 458, which was subsequently signed by Governor More. HB 458 was sponsored by Delegate Jazz Lewis (HD-24). This bill dealt with several issues involving school construction, but with this letter, we are concerned with § 5-327(d), the requirement that "The Interagency Commission, in coordination with the Department of General Services [(DGS)], shall develop life-cycle cost analysis standards." The effective date for the portion of the law in concern is July 1, 2023.

Life-cycle analysis is an important requirement for many reasons when it comes to constructing long-term capital assets like schools. Firstly, schools have long-term operations and maintenance (O&M) costs that need to be adequately accounted for in planning since upfront cost savings in construction may come at long-term costs in terms of increased O&M that result in greater costs to the taxpayer over time than would have otherwise occurred. Secondly, fossil fuel energy use, in particular, comes with negative impacts on student health and the climate, and these need to be factored into the decisions about how to construct new schools. Finally, Maryland, through the Climate Solutions Now Act, has set a deadline for our economy to be net zero by 2045, which is in line with climate science. Equipment that otherwise has a physical life-cycle of more than 20 years (such as a boiler) will no longer be able to be used for its entire useful life.

At this point, we have not seen any publication of drafts for public comment or life-cycle analysis standards that were developed in coordination with DGS. We realize that you are likely working on this already, but this is important work that LEAs need in order to ensure cost-effective and sustainable school construction. We do urge the IAC to publish a draft of its new life-cycle analysis standards so that the public can comment on this vital work.

When the standards are updated, it is important to include several factors related to climate planning beyond what is currently being considered:

- Fossil fuel equipment should not be given a useful life that extends beyond 2045 since that is the date for which Maryland will be net-zero under the Climate Solutions Now Act.

- The cost to retrofit buildings with EV charging before 2045 should be considered compared to the cost of making a building EV-ready.
- Cost decisions must factor in refundable tax credits and state incentives that will offset the upfront costs of solar, heat pumps, and energy efficiency.
- Cost savings from solar installation should be weighed in the long-term operating costs.

We appreciate your consideration of these comments. If you have any questions, please message climateparentsPGMD@gmail.com. We also look forward to seeing drafts of the life-cycle cost analysis standards required to be completed under HB 458.

Sincerely,

A handwritten signature in black ink that reads "Joseph Jakuta". The signature is written in a cursive style with a long, sweeping underline.

Joseph Jakuta
Lead Volunteer
Climate Parents of Prince George's

CC: Delegate Jazz Lewis
Courtney League, Assistant Secretary, Office of Design, Construction and Energy, DGS