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Bill McQuade 2025-2026 ASHRAE President

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August 11, 2025

Dr. Michelle Morse Acting Health Commissioner Department of Health and Mental Hygiene City of New York 42-09 28th Street - CN31 Long Island City, NY 11101

Sent via email to: pressoffice@health.nyc.gov

Re: Community Cluster of Legionnaires' Disease in Central Harlem

Dear Acting Commissioner Morse:

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 53,000 members, including nearly 2,500 in New York State, focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

ASHRAE is a nonprofit professional and technical society that has developed industry-leading standards for Legionnaires' Disease risk management, as part of our comprehensive guidance on water system risks. We are writing to you to offer ASHRAE's technical expertise and assistance in addressing the recent outbreak of Legionnaires' Disease in New York City.

Legionnaires' disease, a serious form of pneumonia caused by Legionella bacteria, is most commonly associated with water systems where water is not adequately monitored or treated. After periods of heavy rains and flooding, there is an increased risk of Legionnaires' disease due to potential contamination of water sources and disruptions to water systems. Flooding can mobilize Legionella bacteria-rich biofilms in water systems, leading to higher bacterial loads and potential colonization of the built environment. While the disease has been known for decades, recent outbreaks have underscored the importance of consistent water management practices in water distribution systems and facilities of all sizes and types.

ASHRAE Standard 188-2021, <u>Legionellosis: Risk Management for Building Water Systems</u>, provides minimum legionellosis risk management requirements for new and existing buildings and

their associated water systems and components. The standard applies to commercial, institutional, multi-unit-residential, and industrial buildings. ASHRAE Guideline 12-2023, *Managing the Risk of Legionellosis Associated with Building Water Systems*, is a supplement to this standard and provides detailed guidance for water management program teams to develop the necessary elements of an effective water management plan.

We appreciate that several sections of Standard 188 are already referenced in the city's existing requirements for certain buildings' water management plans, but we still strongly recommend that the entire Standard be incorporated by reference in full, to ensure its effectiveness in mitigating Legionnaires' Disease risk. We also recommend referencing the most recent edition of the standard (currently the 2021 edition), as each subsequent edition of the standard includes essential updates from the previous editions. This outbreak underscores the importance of consistent, comprehensive water management practices in source water distribution systems and facilities of all sizes and types, and ASHRAE's guidance offers design teams, building managers and health officials a structured approach to mitigating risk and protecting occupants.

ASHRAE Standard 188 and Guideline 12 are written to be usable and implemented by a broad range of building owners without requiring compliance, training, or certification in any hazard analysis, risk assessment, or risk management methodologies. They contain extensive input from industry, academia, and healthcare and from city, state, and national public health departments and regulatory authorities. As a society with over 125 years of experience and representing some of the sharpest minds in the industry, we respectfully urge the Health Department to rely on the technical materials prepared by ASHRAE. Managing water systems to minimize the risk of contamination from Legionella is essential, and ASHRAE can provide any additional technical materials or briefings that you may need as the Health Department responds to this crisis.

Please do not hesitate to contact me or have your staff email <u>GovAffairs@ashrae.org</u>. Thank you for your consideration of this important matter and for working to ensure the health and well-being of building occupants.

Sincerely,

Bill McQuade

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