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M. Dennis Knight
2024-2025 ASHRAE President

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May 27, 2025

The Honorable Pete Harckham
Chair
Environmental Conservation Committee
New York Senate
Washington Ave and State St.
Albany, NY 12224

Re: S. 7410, "Directs the Department of Environmental Conservation to conduct a study on retrofitting certain schools"

Dear Chair Harckham:

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 over 2,000 in New York, 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 global built environment today.

We appreciate the opportunity to provide comments on S. 7410, "Directs the Department of Environmental Conservation to conduct a study on retrofitting certain schools", which would create a study on the needs and costs related to retrofitting and updating air filtration and ventilation systems, and sealing building envelopes, for school buildings that are located within 500 feet of a major highway.

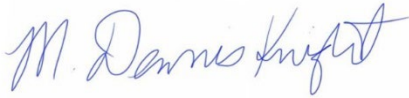
ASHRAE supports the goal of this legislation to study the retrofitting needs of schools in order to improve indoor air quality (IAQ). ASHRAE's position is that supporting the health and well-being of building occupants is the most important aspect of the indoor environment. We know from a wide body of scientific work that poor indoor air quality significantly and negatively affects student's learning and health, and that good indoor air quality creates better educational and health outcomes. Monitoring and testing IAQ is a crucial first step toward ensuring adequate IAQ for students: we cannot fix an issue that we cannot identify, and we cannot fix what we cannot measure.

ASHRAE has developed technical standards that support ventilation and filtration assessments as well as building envelope evaluations, and we recommend these relevant standards be required when conducting the study that would be authorized by this legislation:

- **ANSI/ASHRAE Standard 62.1-2022, *Ventilation and Acceptable Indoor Air Quality*:** Standard 62.1 specifies minimum ventilation rates and other measures intended to provide indoor air quality that is acceptable to human occupants and minimizes adverse health effects due to poor IAQ. It defines the requirements for ventilation and air-cleaning system design, installation, commissioning, and operations and maintenance.
- **ANSI/ASHRAE Standard 180-2018, *Standard Practice for Inspection and Maintenance of Commercial Building HVAC Systems*:** The use of Standard 180 helps to ensure that HVAC systems are well operated and maintained. Standard 180 gives details on how to implement inspection and maintenance practices, provides a list of the necessary tasks, and includes informative appendices with examples of situations in which a maintenance plan should be reviewed.
- **ANSI/ASHRAE Standard 52.2-2017, *Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size*.** This standard is a valuable tool for measuring the performance of certain air cleaning devices.

Thank you for your consideration of ASHRAE's comments regarding Senate Bill 7410. ASHRAE looks forward to being a technical resource as you consider this as well as other legislation concerning building systems and their impact on indoor air quality. If you need additional information or would like to be connected to a technical expert, please contact GovAffairs@ashrae.org.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is fluid and cursive, with the first name "M." and last name "Knight" clearly legible.

M. Dennis Knight
2024-2025 ASHRAE President