



Shaping Tomorrow's
Built Environment Today

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2021-2022 ASHRAE President

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March 9, 2022

Ms. Carolyn Snyder
Deputy Assistant Secretary for Energy Efficiency
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy 1000
Independence Avenue SW
Washington, DC 20585

Re: Building Performance Standards Coalition: Private Sector Technical Support

Dear Deputy Assistant Secretary Snyder:

Building Performance Standards (BPS) are essential to maximize the comfort and minimize the carbon impact of commercial and multifamily buildings. The average American is spending 87% of their life inside buildings¹, facing exposure to a range of pollutants that impact indoor air quality and as a result, human health. In addition to impacting public health, buildings also impact our carbon footprint – the worldwide building sector accounts for 40% of energy related carbon emissions. ASHRAE applauds the Biden-Harris Administration's acknowledgement of the need to expand energy efficiency and decarbonization in existing buildings by developing BPS and implementing policies that reduce emissions, create jobs, lower energy bills, and improve public health.

We also appreciate the Administration's ability to coalesce 33 state and local governments around President Biden's goal to retrofit four million buildings during his first term.² We understand that the Department of Energy's Building Technologies Office is working to identify **private sector technical support** to assist cities, states and building owners in the Administration's effort to develop and enact BPS strategies by Earth Day 2024. **ASHRAE**, a technical society founded in 1894 that serves humanity by advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied

¹ Klepeis, N., Nelson, W., Ott, W. *et al.* The National Human Activity Pattern Survey (NHAPS): a resource for assessing exposure to environmental pollutants. *J Expo Sci Environ Epidemiol* **11**, 231–252 (2001).

² The White House. 2022. *FACT SHEET: Biden-Harris Administration Launches Coalition of States and Local Governments to Strengthen Building Performance Standards.*

fields, **offers its technical expertise to the BPS Coalition.** With over 35,000 individual members in the U.S. with expertise in building systems, including energy efficiency and building decarbonization, ASHRAE is well positioned to help communities with technical expertise to achieve these important objectives.

[ASHRAE's Task Force for Building Decarbonization \(TFBD\)](#) can also help support these efforts. ASHRAE has been involved with the promotion and measurement of energy efficiency in buildings for decades. Recognizing that operational carbon emissions are a function of energy conversion and consumption, and that energy conservation alone cannot adequately address the emissions reductions necessary to slow climate change, ASHRAE is advancing strategies toward direct reduction of carbon emissions in the built environment. The targeted carbon emissions include not only those directly resulting from the operation of buildings, but also those embodied in the materials incorporated into buildings and those generated by the building construction process itself. ASHRAE's TFBD has established nine working groups targeting specific aspects of building decarbonization, including one specifically focused on Building Performance Standards.

Many of ASHRAE's building standards apply directly to decarbonization of existing buildings. For example, ASHRAE Standard 100-2018 *Energy Efficiency in Existing Buildings* stipulates criteria for reduced energy consumption through improved performance in existing buildings. This standard provided a vital underpinning for Washington State's Clean Buildings law, which authorized a mandatory statewide building performance standard for commercial buildings. ASHRAE Standard 211-2018 *Standard for Commercial Building Energy Audits*, which establishes consistent practice for conducting and reporting energy audits for commercial buildings, is also referenced in the legislation to support consistency in measurement and compliance.

ASHRAE recognizes the built environment is essential in addressing climate change and looks forward to contributing technical assistance in supporting the development of practical Building Performance Standards for communities that are part of the Administration's BPS Coalition. ASHRAE staff will follow-up with your staff to schedule a meeting to discuss how ASHRAE can further contribute toward this effort. If you have more immediate questions, please don't hesitate to contact me or have your staff contact ASHRAE's government affairs staff at GovAffairs@ASHRAE.org. Thank you.

Sincerely,



Michael CA (Mick) Schwedler, P.E., Fellow ASHRAE, LEED AP
2021-2022 ASHRAE President

cc: The Honorable Brenda Mallory, Chair, Council on Environmental Quality
Mr. Mark Chambers, Senior Director of Building Emissions, Council on Environmental Quality
Ms. Kelly Speakes-Backman, Principal Deputy Assistant Secretary, Office of Energy Efficiency and Renewable Energy