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M. Dennis Knight
2024-2025 ASHRAE President

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February 27, 2025

The Honorable Dustin Burrows
Speaker of the House
Texas State Capitol
PO Box 2910
Austin, TX 78768

RE: Support for HB 882 “Relating to building codes applicable in the unincorporated areas of a county; authorizing a fee.”

Dear Speaker Burrows:

I am writing on behalf of ASHRAE, the American Society of Heating, Refrigerating, and Air Conditioning Engineers. We are a professional and technical society of more than 55,000 members dedicated to energy efficiency, indoor air quality, resiliency, and sustainability in the built environment. Through our Society’s research, standards writing, publishing, certification, and continuing education, ASHRAE shapes tomorrow’s global built environment today. As one of the premier subject matter experts on the built environment, and on behalf of more than 2,700 ASHRAE members in the state of Texas, I wish to convey our support for TX House Bill 882.

This legislation would, if passed, allow unincorporated areas in Texas to enforce, and allow them to amend, a residential and a commercial building code, which are called the International Residential Code (IRC) and the International Building Code (IBC) respectively. ASHRAE writes standards which inform both codes; six different ASHRAE publications are used across the residential and building codes. The ASHRAE standards referenced in these codes include:

- Standard 34: Designation and Safety Classification of Refrigerants
- Standard 193: Method of Test for Determining Air Tightness of HVAC Equipment
- Standard 170: Ventilation of Healthcare Facilities

Subsequently, we believe that the use of these codes will help advance resilience, health, and safety in the built environment.

Direct resiliency benefits from these codes include provisions in the IRC for collecting, storing, and using various types of non-potable water to ensure health and safety, and IBC provisions focused on assuring that a community's building stock supports full community resilience. The IBC's entire scope is focused on life-safety and protecting occupants from adverse impacts from buildings at all times, and in the face of disasters. The National Institute of Buildings Sciences (NIBS) in its [*Natural Hazard Mitigation Saves: 2018 Interim Report*](#) found that adoption of the International Building Code and the International Residential Code provide an \$11 benefit for every \$1 invested due to their effectiveness in mitigating the risk posed by disasters.

The IBC and IRC are already adopted and enforced in many jurisdictions in Texas, but Texans who choose to live in unincorporated areas currently cannot benefit from these common-sense policies. This is because while state law sets some minimums, there are often no inspection and enforcement mechanisms available to unincorporated areas, which is an issue that this legislation addresses. ASHRAE believes that no one should have to live in a subpar, unsafe structure that cannot withstand or recover from natural disasters just because of the jurisdiction that they live in.

For these reasons, ASHRAE supports TX HB 882 and urges for it to be assigned to a committee and passed swiftly. If you have any questions or need additional information, please feel free to contact GovAffairs@ashrae.org. Thank you for your work to improve building performance and improve the lives of Texas residents.

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is written in a cursive, flowing style.

M. Dennis Knight
2024-2025 ASHRAE President