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2024-2025 ASHRAE President

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February 21, 2025

The Honorable Chip Curry
The Honorable Traci Gere
Joint Committee on Housing and Economic Development
ME State Capitol
3 State House Station
Augusta, ME 04333

RE: Opposition to ME LD 445 “An Act to Stimulate Housing Production by Increasing the Threshold Before Participation in the Maine Uniform Building and Energy Code Is Mandatory”

Dear Senator Curry and Representative Gere:

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 our nearly 200 members in the state of Maine, we wish to convey our opposition to ME LD 445 and urge you to vote the bill down in your committee.

ME LD 445 would, if passed, exempt municipalities in Maine with a population of between 4000 and 10,000 people from needing to comply with the Maine Uniform Building and Energy Codes. Based on recent census data, there are 66 municipalities in Maine with a population in this range

with a combined population of 413,952 people, which amounts to nearly one third of the state's population.¹

This legislation is concerning to us because three ASHRAE standards are adopted in Maine:

- ASHRAE Standard 62.1-2016 *Ventilation and Acceptable Indoor Air Quality*
- ASHRAE Standard 62.2-2016 *Ventilation and Acceptable Indoor Air Quality in Residential Buildings*
- ASHRAE Standard 90.1-2016 *Energy Standard for Sites and Buildings Except Low-Rise Residential Buildings*

ASHRAE Standards 62.1 and 62.2 both set the floor for acceptable indoor air quality (IAQ). IAQ impacts people's health, comfort, well-being, learning outcomes and work performance. Standards 62.1 and 62.2 help ensure that the air inside our buildings is clean and safe by limiting sources of pollutants and requiring enough mechanical ventilation to provide dilution for unavoidable contaminants. The health impacts of poor IAQ include cardiovascular and respiratory illness, and there are approximately 3.2 million deaths per year attributable to household air pollution. These standards ensure that heating, ventilating, and air-conditioning systems work together to effectively ventilate homes and minimize indoor pollution.

ASHRAE Standard 90.1 provides minimum requirements for the energy-efficient design of sites and buildings except low-rise residential buildings. This standard sets minimum energy efficiency requirements for commercial and mid- to high-rise residential buildings in Maine. The adoption of the newest edition of Standard 90.1 in Maine, which is slated to take place this April, is expected to save the state and its citizens nearly \$100,000,000 over the next 30 years while mitigating just over 450,000 metric tons of CO₂ emissions.²

All our standards adopted in Maine create important and tangible benefits to building owners and occupants. Ceasing to enforce these standards in small jurisdictions would have predictable and regrettable effects on the health and safety, and finances of Maine's residents, and jeopardize Maine's climate goals. Were this legislation to pass, we would expect to see new construction that fails to meet the minimum standards enforced in the rest of the state, and subsequently we would expect to see buildings constructed that are less energy efficient and have worse indoor air quality. Mainers who live in smaller jurisdictions still deserve energy efficient buildings that do not cost them an arm and a leg to heat and cool, and they still deserve built environments that keep occupants safe and healthy by providing adequate indoor air quality.

Thank you for your consideration of our comments. We urge you to vote against ME LD 445 and welcome any opportunity to answer questions or speak to you about this legislation or the built

¹ "Maine City/Town Census Data 2010 and 2020." n.d. Accessed February 20, 2025.
<https://www.maine.gov/dep/water/grants/SRF/2022/Maine%20City-Town%20Census%20Data%202010%20&%202020.pdf?ref=ambrook>.

² Tyler, M, Y Xie, E Poehlman, and M Rosenberg. 2021. "Choose an Item. Cost-Effectiveness of ANSI/ASHRAE/IES Standard 90.1-2019 for Maine." https://www.energycodes.gov/sites/default/files/2021-07/Cost-effectiveness_of_ASHRAE_Standard_90-1-2019-Maine.pdf.

environment more broadly. Thank you for your work to improve building performance and improve the lives of Maine's residents.

Sincerely,



M. Dennis Knight
2024-2025 ASHRAE President



Adrian Clements
2024-2025 Maine Chapter President



Rae Pinyard
2024-2025 Maine Chapter Government Affairs Chair