January 18, 2024

To: Secretary Serena McIlwain
Maryland Department of the Environment
Montgomery Park Business Center
1800 Washington Blvd.
Baltimore, MD 21230

CC: Director Paul Pinsky, Maryland Energy Administration
Chris Rice, Chief of Staff, Maryland Energy Administration
Suzanne Dorsey, Deputy Secretary, Maryland Department of the Environment
Mark Stewart, Manager, Climate Change Program, Maryland Department of the Environment
Chris Hoagland, Director, Air & Radiation Administration, Maryland Department of the Environment

Dear Secretary McIlwain:

The undersigned organizations are appreciative and supportive of the Maryland Department of the Environment’s (MDE) proposed Building Energy Performance Standards (BEPS), which are a critical measure for reducing greenhouse gas emissions from covered buildings in compliance with the Climate Solutions Now Act (CSNA)’s mandates. As illustrated in the proposed regulations, Maryland’s BEPS program is one of the strongest in the United States, and is particularly important for CSNA compliance because it will drive reductions in carbon emissions and facilitate the electrification of other sectors of the economy by limiting peak electricity demand and energy use intensity in buildings. Accordingly, we urge MDE not to weaken any provisions of the proposed BEPS regulations between now and their final publication.

The proposed BEPS regulations also carry additional benefits for Marylanders. From an economic perspective, the undersigned organizations appreciate that the proposed regulations are expected to reduce energy costs per square foot for occupants of covered buildings, which would benefit small businesses. Additionally, requiring buildings that are over 35,000 square feet in area to report on and reduce their greenhouse gas emissions is expected to improve public health by reducing nitrogen oxide, particulate matter, and other harmful air contaminants from fossil fuel combustion in buildings. The undersigned organizations expect these economic and public health benefits to bring about equitable improvements, enabling low- and moderate-income Marylanders residing in covered buildings to pay lower energy bills and face lower risks of acquiring asthma and other respiratory illnesses. We look forward to working with MDE and
other agencies to continue supporting the implementation of BEPS in ways that support and preserve affordable housing.

We also appreciate MDE’s consideration of this coalition’s June 2023 comments on its draft BEPS regulations and look forward to seeing finalized BEPS regulations take effect in the near future.

Sincerely,

CASACedar Lane Environmental Justice MinistryCenter for Progressive ReformCeresChesapeake Climate Action NetworkClimate Communications CoalitionEarthjusticeElders Climate Action MarylandGreen & Healthy Homes InitiativeHoCoClimateActionIndivisible HoCoMD Environmental ActionInstitute for Market TransformationInterfaith Power & Light (DC.MD.NoVA)League of Women Voters of MarylandMaryland League of Conservation VotersMaryland Legislative CoalitionMaryland Legislative Coalition Climate Justice WingPassive to PositiveSierra Club Maryland ChapterThe Climate Mobilization, Montgomery County ChapterUnitarian Universalist Legislative Ministry of Maryland