

# marylandclimatepartners

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 (MDE)'s 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

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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,

CASA  
Cedar Lane Environmental Justice Ministry  
Center for Progressive Reform  
Ceres  
Chesapeake Climate Action Network  
Climate Communications Coalition  
Earthjustice  
Elders Climate Action Maryland  
Green & Healthy Homes Initiative  
HoCoClimateAction  
Indivisible HoCoMD Environmental Action  
Institute for Market Transformation  
Interfaith Power & Light (DC.MD.NoVA)  
League of Women Voters of Maryland  
Maryland League of Conservation Voters  
Maryland Legislative Coalition  
Maryland Legislative Coalition Climate Justice Wing  
Passive to Positive  
Sierra Club Maryland Chapter  
The Climate Mobilization, Montgomery County Chapter  
Unitarian Universalist Legislative Ministry of Maryland