



# Shaping Tomorrow's Global Built Environment Today

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M. Dennis Knight  
2024-2025 ASHRAE President

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February 27, 2025

The Honorable Naquetta Ricks  
Chair  
Committee on Business Affairs and Labor  
Colorado House of Representatives  
200 E. Colfax Ave.  
Denver, CO 80203

Re: HB 25-1245, "Concerning HVAC Infrastructure Improvement Projects in Schools"

Dear Chair Ricks:

I am writing on behalf of ASHRAE, the American Society of Heating, Refrigerating, and Air Conditioning Engineers, to provide comments on House Bill 25-1245, regarding HVAC infrastructure improvement projects in schools, which is currently under consideration by the Committee on Business Affairs and Labor. **ASHRAE supports the goals of the legislation, which is intended to provide healthy, safe and energy efficient school facilities in Colorado.** We applaud these efforts. In particular, we are pleased to see that HB 25-1245 is focused on infrastructure improvements for HVAC systems in schools. Proper design, installation, inspection, and maintenance of HVAC systems are essential to providing good indoor air quality (IAQ).

As a technical society that exists to serve humanity by advancing the arts and sciences of heating, ventilation, air conditioning, refrigeration and their allied fields, we offer suggestions to strengthen this legislation. ASHRAE is a not-for-profit technical and professional society of more than 55,000 members, including more than 1,100 in Colorado. ASHRAE develops consensus-based building standards, including those on energy efficiency, indoor air quality, and sustainability that we ask you to reference in HB 25-1245 to bolster its effectiveness:

- We support the legislation's inclusion of **Standard 52.2-2017, *Method of Testing General Ventilation Air-Cleaning Devices for Removal Efficiency by Particle Size***. This standard is a valuable tool for measuring the performance of certain air cleaning devices.
- **Standard 62.1-2022, *Ventilation and Acceptable Indoor Air Quality***: Standard 62.1 specifies minimum ventilation rates and other measures intended to provide indoor air quality that is acceptable to human occupants and minimizes adverse health effects due to poor IAQ. It defines the requirements for ventilation and air-cleaning system design, installation, commissioning, and operations and maintenance.

- **Standard 241-2023, *Control of Infectious Aerosols*:** This standard for buildings focuses on airborne infection risk mitigation. It establishes minimum requirements for building owners, operators and professionals to improve IAQ by reducing the risk of airborne disease transmission by infectious aerosols. Standard 241 is meant to be applied in periods of elevated risk, for example the risk of transmission of pathogens like the SARS-COV-2 virus, which causes COVID-19. Under these conditions, buildings would operate in “Infection Risk Management Mode,” and building operators would have the flexibility to choose between different equivalent clean air options based on what they determine is appropriate for that type of space, along with their specific energy use goals or cost restrictions. This flexibility makes Standard 241 a powerful tool for mitigating transmission risk that can be adapted for specific circumstances.
- **Standard 180-2018, *Standard Practice for Inspection and Maintenance of Commercial Building HVAC Systems*:** Finally, the use of Standard 180 will help ensure that the improvements made by this program will continue to be well operated and maintained. Standard 180 gives details on how to implement inspection and maintenance practices, a list of the necessary tasks, and includes informative appendices with examples of situations in which a maintenance plan should be reviewed.

Thank you for your consideration of ASHRAE’s comments regarding House Bill 25-1245. ASHRAE would be pleased to serve as a technical resource and to answer any questions you might have. We are delighted that Colorado is moving forward to improve its school facilities for students, teachers, and staff. ASHRAE looks forward to being a technical resource as you consider this as well as other legislation concerning building systems and their impact on indoor air quality. If you need additional information or would like to be connected to a technical expert, please contact [GovAffairs@ashrae.org](mailto:GovAffairs@ashrae.org).

Sincerely,

A handwritten signature in blue ink that reads "M. Dennis Knight". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

M. Dennis Knight  
2024-2025 ASHRAE President