



Shaping Tomorrow's  
Built Environment Today

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Jeff H. Littleton  
Executive Vice President

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June 10, 2022

The Honorable Bill Quirk  
Chair  
Assembly Committee on Environmental Safety and Toxic Materials  
California Assembly  
10<sup>th</sup> and L Streets  
Sacramento, CA 95814

Sent via: California Legislature Position Letter Portal

Re: Senate Bill 1144

Dear Chair Quirk:

ASHRAE, founded in 1894, is a global society advancing human well-being through sustainable technology for the built environment. The Society and its more than 51,000 members, including over 3,500 in California, focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Through research, standards writing, publishing, certification and continuing education, ASHRAE shapes tomorrow's built environment today.

We are writing to you regarding Senate Bill 1144, "*Water Efficiency and Quality Assessment Reports: State Buildings and Public School Buildings.*" We appreciate the inclusion of the "most recent version" of ASHRAE's Standard 188, *Legionellosis: Risk Management for Building Water Systems*, in the proposed requirements for water efficiency and quality assessment reports in schools and other public buildings. Managing water systems to minimize the risk of contamination from Legionella is essential.

We also recommend the use of ASHRAE Guideline 12-2020, *Managing the Risk of Legionellosis Associated with Building Water Systems*, which provides detailed guidance for water management program teams to develop the necessary elements of an effective water management plan. Proper management and maintenance of building water systems can be a particularly important aspect of reopening buildings during the COVID-19 pandemic, which are sometimes overlooked.

We commend this committee for addressing this important topic, and we strongly advise that the water quality and assessment report requirements are consistent with the totality of ASHRAE Standard 188, as taking only certain portions from it, or adding to it, could impair its effectiveness and potentially put building occupants at risk. ASHRAE Standard 188 and ASHRAE Guideline 12 are written to be usable and implemented by a broad range of building owners without using or requiring compliance, training, or certification in any hazard analysis, risk assessment, or risk management methodologies. They contain extensive input from industry, academia, and healthcare and from city, state, and national public health

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departments and regulatory authorities.<sup>1</sup> As a society with over 125 years of experience and representing some of the sharpest minds in the industry, we respectfully urge you to rely on the technical materials prepared by ASHRAE. The existing proposal adds requirements well beyond and in conflict with those in ASHRAE Standard 188.

Again, we appreciate the inclusion of the most recent edition of ASHRAE Standard 188 in this bill and hope your committee will ensure that the bill adheres to the entirety of the standard. If you have any questions or need additional information, please do not hesitate to contact me or have your staff email [GovAffairs@ashrae.org](mailto:GovAffairs@ashrae.org). Thank you for your consideration of this important matter and for working to ensure the health and well-being of building occupants.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. Littleton', with a horizontal line extending to the right.

Jeff H. Littleton  
ASHRAE Executive Vice President

cc: The Honorable Scott Weiner

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<sup>1</sup> ASHRAE Standard 188-2021, Section 4, Compliance; ASHRAE Guideline 12, Section 2 Scope, Item 2.3.