

MEMORANDUM
NATURAL RESOURCES ADVISORY BOARD

DATE: October 16, 2025
TO: Mayor and City Council Members
FROM: Natural Resources Advisory Board
SUBJECT: Building Performance Standards

Dear Mayor and Councilmembers,

On September 17, 2025, Katherine Bailey (Project Manager, Energy Services) presented to the Natural Resources Advisory Board (“Board”) regarding the proposed Building Performance Standards (BPS) policy. Buildings are among the largest contributors to greenhouse gas (GHG) emissions in urban areas. Sitting at the intersection between economic, environmental, and physical health, the proposed policy would allow for a significant reduction of GHG emissions through increased efficiency in addition to substantial avoided costs (estimated at \$630 million by 2050) throughout the community in the future. The standards would also improve indoor air quality and produce public health benefits.

The Board would like to express its strong support for the adoption of the BPS policy. Rebates and incentives have been in place since 2002, and while these programs have accounted for a large portion of historic savings, they have not been able to decrease the community’s overall electricity use, which indicates a regulatory pathway is needed. As a Board dedicated to addressing the climate and energy crisis, we are deeply concerned our 2030 GHG reduction goals will not be met without adoption of this policy. This policy also directly supports *City Council Priority #6: Reduce climate pollution and air pollution through best practices, emphasizing electrification* and *Our Climate Future Big Move 6: Efficient, Emissions Free Buildings*.

The Board supports the following key areas of the policy and implementation plan:

- Covered Buildings - Multi-family and commercial buildings greater than or equal to 5,000 square feet. This strikes an appropriate balance between capturing a meaningful amount of the City’s buildings and energy use while focusing on up-front costs to entities that are in a better position to make investments.
- Efficiency Targets - Adoption of Energy Use Intensity (EUI) targets.

- Alternative Compliance Pathways - Resources and off-ramps such as EUI reduction caps, timeline and target adjustments, waivers, and additional support for under-resourced buildings.
- A technical and financial navigator position to provide personalized support to building owners throughout their adoption journey as well as expansion of the incentive-based framework using dollars from the 2025 Tax dedicated to climate initiatives.

Adopting a BPS policy is not just a climate imperative but a strategic investment in the health, economic prosperity, safety, and resilience of our community, especially in light of federal and state budget cuts and loss of tax incentive programs targeting GHG emissions. These issues call on the City to take a firmer stance in meeting 2030 goals. Improvements in building efficiency will also mitigate rising costs for Fort Collins ratepayers. This is because Platte River Power Authority will be able to avoid or defer investments in new generation resources that may otherwise have been necessary due to electricity demand increases from electric vehicles, population growth, building electrification, and other contributors. The BPS policy will also support the development of small businesses and skilled workforces that will be necessary for the deployment of clean technologies and services to implement the policy.

Thank you for your time and consideration of this policy decision that will have positive long-term impacts on future community resilience and health.

Very respectfully,

Kelly Stewart

Chair, Natural Resources Advisory Board

cc: Kelly DiMartino, City Manager
Jacob Castillo, Chief Sustainability Officer
Kelly Ohlson, City Council Liaison to the NRAB
Honore Depew, Sr. Manager Environmental Sustainability & NRAB Staff Liaison
Katherine Bailey, Project Manager, Energy Services