





Memorandum

TO: Kevin J. Jackson, Village Manager 

FROM: Lindsey Roland Nieratka, Chief Sustainability Officer 

FOR: Village President and Board of Trustees

DATE: May 7, 2026

SUBJECT: Development process and timeline for the Village's Building Performance Standards (BPS) policy

Purpose

The purpose of this memo is to provide the Village Board with background on Building Performance Standards and the Village's schedule and plan for policy development and implementation.

Background

The Village of Oak Park passed a Benchmarking Policy in 2023. Buildings over 10,000 square feet are required to report building energy and water usage to the Village annually. Currently, the Village does not require any action beyond reporting. To enhance the benefit of the benchmarking policy and to see reductions in emissions related to covered buildings, the next step for the Village to take is to implement a Building Performance Standard.

A Building Performance Standard (BPS) is a policy that requires buildings of specific types and sizes meet a quantifiable standard in energy performance by a specific date. These policies aim to encourage energy savings and reduce greenhouse gas emissions in existing buildings. The standard may be based on metrics such as energy use intensity or greenhouse gas emissions. BPS policies are outcome-based, and compliance relies on measured performance. While building codes ensure that new buildings are designed to a specific standard, BPS policies help to improve the energy

performance of existing buildings and are an important part of a net-zero strategy.

The Climate Ready Oak Park (CROP) plan calls on the Village to adopt enhanced building performance standards (EE02) and to establish and implement a percent goal for energy efficiency to update existing housing stock and commercial buildings (EN02). The 2026 Village Board Goals include the goal 5.1.g – Work with and develop programs for large building owners to increase energy efficiency and electrification, including increasing compliance with the benchmarking ordinance, evaluating building performance standards, evaluating the adoption of the Illinois Finance Authority’s CPACE ordinance, and creating incentive and technical assistance programs (based on CROP BD04, EE02, EN01, EN02).

Examples of Building Performance Standards

- **Evanston, IL** – Evanston’s BPS was instituted in 2025 for buildings over 20,000 s.f. (10,000 s.f. for government buildings). Evanston’s metrics include site EUI, greenhouse gas emissions, and percentage of electricity sourced from renewable energy. The end target in Evanston is that by 2050, each covered property must maintain the maximum normalized site EUI, zero greenhouse gas emissions, and source 100% of electricity from renewable sources. Starting in 2030, interim performance standards must be met every five years. Evanston exempts condominium buildings smaller than 50,000 square feet.
- **St. Louis, MO** – Instituted in 2020, St. Louis’ BPS applies to buildings over 50,000 square feet. Every four years, covered buildings in St. Louis must demonstrate that their site energy use intensity is better than 65% of buildings of the same property type.
- **Cambridge, MA** – Since 2023, buildings in Cambridge must demonstrate a straight-line trajectory from their baseline to zero carbon with a five-year compliance cycle. For buildings over 100,000 square feet, the end deadline is 2035, and for buildings larger than 25,000, the target is 2050. Multifamily properties are exempt from compliance.
- **Seattle, WA** – Instituted in 2023, the City of Seattle set greenhouse gas intensity targets measured as a value of kgCO₂e per square foot. Targets are set on a five-year cycle for building type.

Building Performance Standard Development Process and Timeline

The Village is utilizing technical support from the Midwest Energy Efficiency Alliance (MEEA), Slipstream, and Illinois Green Alliance. Referred to as the Village's technical advisors in the steps below, this support is funded through ComEd.

1. **Stakeholder Engagement:** This engagement will be ongoing. Throughout the process of developing and implementing the BPS, impacted stakeholders will need to be engaged. Stakeholders include the Village's elected officials, relevant Boards and Commissions, property owners, community groups, and any other groups potentially impacted by the policy. Technical advisors will provide support through facilitating engagement, identifying experts, and developing materials. Engagement will include the following:
 - a. General information sessions.
 - b. Individual outreach to major property owners.
 - c. Case studies and expert speakers.
 - d. Townhalls and listening sessions.
2. **Confirmation of the Covered Building List:** This step is primarily completed with the possibility of refinement and regular maintenance. The Village has an established Covered Building List (CBL) for the Benchmarking policy. Staff will continue to ensure that all the contacts on the CBL are up to date and that contact has been made with each of the covered buildings. In addition, Staff will evaluate whether the covered building list should be the same for both Benchmarking and BPS, or if the BPS strategy should be phased in or carry more exemptions.
3. **Evaluation of existing buildings:** Using Benchmarking data, staff and technical advisors will evaluate the current performance of Village buildings and identify trends. This step can also help identify buildings that may be vulnerable property types (e.g., Affordable Multifamily).
4. **Establish rulemaking and oversight authorities:** Staff will evaluate the need for the formation of a steering committee for the rulemaking and possibly a new Commission for oversight. Technical advisors will provide best practices from other communities and help identify and recruit committee members.
 - a. **Rulemaking steering committee:** This steering committee will be an Ad Hoc committee appointed by the Village Board. Potential steering committee members will include building owners, building scientists,

climate advocates, and other members of the public with subject matter expertise and vested interest in the policy. This group will be formed at the beginning of planning.

- b. **Oversight Commission:** An oversight commission may assist in identifying buildings which may require exemptions, guiding assistance to more vulnerable buildings, evaluating alternative compliance pathways when granted, and overseeing the implementation of the policy. This Commission will be established after the policy is passed and before the first compliance deadline. The role could potentially be served by a subcommittee of the Environment & Energy Commission, possibly requiring an expansion in membership and specific requirements for members.
5. **Select Performance metrics:** Municipalities select different measures of performance depending on the goals of the community. Potential metrics include Energy Use Intensity, Emissions Intensity, and percent Renewable energy. To select metrics that best meet the goals of the Board and community, Village Staff will engage community members, Commissions, and seek input from the Board.
6. **Determine targets, timelines, and compliance pathways:** The Village, with stakeholder engagement and a steering committee, will select an end-point performance (e.g., Net Zero by 2050) and develop interim targets and reporting requirements. Through stakeholder engagement, staff will recommend exemptions to consider and properties that may need alternative compliance pathways. Technical advisors will assist with feasibility analyses, forecasting affordability impacts, and facilitation of stakeholder engagement.
7. **Create policy support and enforcement mechanisms:** Once the policy end goal and interim targets are developed, Staff will evaluate building owner support needed and methods for enforcement. Technical advisors will provide examples from other communities and support for communication.
8. **Ordinance adoption:** After completing the stakeholder engagement, establishing the oversight bodies, and determining targets and timelines, Staff will bring the final policy to the Board for adoption. Technical advisors will assist by providing model ordinances and a revision of ordinance drafts. When considering adoption, Staff will provide the Village Board with an implementation plan.

Environment & Energy Commission

At the April 7, 2026 meeting of the Environment & Energy Commission, commissioners voted unanimously to recommend that the Village pursue a Building Performance Standards policy following the steps outlined in this memo.

Next Steps:

Village Staff will begin hosting general information sessions for stakeholders and the general public in May and June. Sustainability Staff intend to attend various business association meetings to provide an overview of benchmarking policies and invite building owners, property managers, and contractors to a town-hall style meeting in June. Technical advisors will join Village Staff at A Day in the Village on June 7 to begin to explain Building Performance Standards to the general public and get questions and comments. In May and June, staff and technical advisors will be creating the framework for the formation of the rulemaking steering committee and the oversight commission. Staff anticipates having a Building Performance Standard Ordinance ready for Board review and approval by Q2 of 2027.

Attachments:

- A. Building Performance Policy Flow Chart
- B. BPS Development Timeline

cc: Lisa Shelley, Deputy Village Manager
Ahmad Zayyad, Deputy Village Manager
Jack Malec, Assistant to the Village Manager
Jonathan Burch, Neighborhood Services Director
Craig Failor, Development Services Director
Christina M. Waters, Village Clerk
All Department Directors

Benchmarking and Building Performance Policy Setting Flow Chart

Benchmarking: Building Energy Benchmarking (Benchmarking) is a policy that requires building energy use to be measured and compared to itself over time, the energy use of similar buildings, or an energy standard.

Building Performance Standard (BPS): Requirement that focuses on improving the existing building stock through setting minimum targets for efficiency upgrades.

