

NAHB Research Center

2012 National Green Building Standard

HELD and Non-Responsive Public Comments – on Draft 1

Note: *The comments listed in this document are not in the scope of the Public Comment Period on the Draft Standard (September 23, 2011). At the request of the submitter, the HELD comments can be retained and be processed as a proposed changes during the next revision of the Standard. No further action will be taken on the comments classified as Non-Responsive because they are not relevant to any action that can be taken by the Consensus Committee.*

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Task Group 1

Chapter 1 Scope and Administration

HPC #	Log ID	Full Name Company Jurisdiction Entity Represented	Section Number Requested Action	Comment	Proposed Resolution	TG Action	Reason
HPC 001	794	Shari Hendley J.S. Hovnanian & Sons J.S. Hovnanian & Sons	101.3 Intent Revise as follows	"This Standard shall establish practices for the design and construction of green residential buildings, building sites, subdivisions, and renovation thereof." While considering instituting these changes, please keep in mind that those who choose to continue to certify their sites, renovations and/or new construction are doing so in spite of the continued slow economy, and decreased home values and sales volumes.	Please take into consideration the continued slow economy, decreased sales volumes and increasing costs when determining the right time to institute some or all of these changes.		Not in the scope of the public comment process. The Draft Standard does not include any changes to Section 101.3. Also, comments on implementation of the Standard are not in the purview of the consensus committee. As an informational item only, your comment will be forwarded to Michelle Desiderio who is the point of contact for the certification program. No further action will be taken on this comment. Note: This comment is also classified as non-responsive.
HPC 002	739	Thomas Culp Birch Point Consulting LLC Aluminum Extruders Council	102.1 Applicability Revise as follows	Hotels and Motels. Currently, the standard does not use the same scope for residential buildings as the IECC or ASHRAE. I understand this is from the desire to cover apartment buildings not just below 3 stories. However, the generic term "residential" can be interpreted as also containing hotels and motels, which are R-1 occupancies, although these have very different construction and use than other residential buildings. For this reason, hotels and motels are treated as commercial buildings in the IECC. As just one example, hotels commonly use commercial windows and curtain wall assemblies rather than residential windows in lobby areas, rooms, or both. HVAC and lighting are also very different. My previous comments attempted to address this in the window section by pointing to the commercial sections of the IECC for these types of buildings. They were rejected because the committee felt windows should not be treated differently than the rest, and also stated "Hotels and motels are covered under commercial building." I agree, but since hotels and motels are group R-1, I think this proposed change in the Applicability section helps clarify this.	102.1 Applicability. The provisions of this Standard shall apply to design and construction of the residential portion(s) of any building not classified as an institutional use <u>or R-1 occupancy</u> in all climate zones. This Standard shall also be used for subdivisions, building sites, and the residential portions of alterations, additions, renovations, mixed-use residential buildings, and historic buildings, where applicable. <i>or if you don't wish to use occupancy classes,</i> 102.1 Applicability. The provisions of this Standard shall apply to design and construction of the residential portion(s) of any building not classified as an institutional use, <u>hotel, or motel</u> in all climate zones. This Standard shall also be used for subdivisions, building sites, and the residential portions of alterations, additions, renovations, mixed-use residential buildings, and historic buildings, where applicable.		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).

Chapter 3 Compliance Method

HPC #	Log ID	Full Name Company Jurisdiction Entity Represented	Section Number Requested Action	Comment	Proposed Resolution	TG Action	Reason
HPC 003	695	Drew Wallace econsultants, LLC self	301.2 Awarding of points Revise as follows	This is just a general comment. Does not particularly pertain to the Chapter and Section listed above. I would like to suggest that you take in to consideration low income housing projects when you decide on the timeline to implement the new standard. Energy Star did this with the new Version 3.0	Similar to the exception Energy Star used I would suggest that you allow low income housing projects to continue to certify to the 2008 Green Building Standard for an extended period of time.		This public comment is unrelated to the contents of the Draft Standard (September 23, 2011). Also, comments on implementation of the Standard are not in the purview of the consensus committee. As an informational item only, your comment will be forwarded to Michelle Desiderio who is the point of contact for the certification program. No further action will be taken on this comment. Note: This comment is also classified as non-responsive.

Chapter 10 Operation, Maintenance and Building Owner Education

HPC #	Log ID	Full Name Company Jurisdiction Entity Represented	Section Number Requested Action	Comment	Proposed Resolution	TG Action	Reason
HPC 004	726	Josh Jacobs GREENGUARD Environmental Institute GREENGUARD Environmental Institute	1001.1 Homeowner's Manual Revise as follows	This section discusses many things that can contribute to not only the buildings continued 'greenness', but also the sustainable footprint of the people that occupy it. One of the main things that can be detrimental to a home's sustainability following construction is the introduction of unhealthy/unsafe cleaning practices. These can directly impact not only the occupant's health, but also the natural environment around the home and even far afield. We should require information be provided to the homeowner on green cleaning practices.	(19) Instructions for maintaining gutters and downspouts and importance of diverting water a minimum of 5 feet away from foundation. (20) A narrative detailing the importance of maintenance and operation in retaining the attributes of a green-built building. (21) Where storm water management measures are installed on the lot, information on the location, purpose, and upkeep of these measures. (22) Explanation of and benefits from green cleaning in the home.		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 005	742	Susan Gitlin US Environmental Protection Agency US Environmental Protection Agency	1001.1 Homeowner's Manual Revise as follows	We are glad to see that this section includes information on local recycling programs. The section should also specify information identifying local governments, utilities, retailers and manufacturers who offer proper disposal of refrigerators and freezers in partnership with EPA's Responsible Appliance Disposal (RAD) Program. RAD is an EPA partnership program that protects the ozone layer and reduces emissions of greenhouse gases (http://www.epa.gov/ozone/partnerships/rad/). The requirements of the RAD program include ensuring that: 1) refrigerant from appliances is recovered and either reclaimed or destroyed; 2) appliances' insulating foam, which contains harmful foam-blowing agents, is recovered and destroyed, or the blowing agent is recovered and reclaimed; 3) metals, plastic and glass are recycled; and 4) PCBs, mercury and used oil are recovered and properly disposed of.	UUU		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 006	744	Susan Gitlin US Environmental Protection Agency US Environmental Protection Agency	1003.2 Operations Manuals Revise as follows	a) We are glad to see that this section includes information on local and on-site recycling and hazardous waste disposal programs. The section should specifically mention local recycling of refrigerators and freezers, which contain hazardous materials subject to proper management and storage requirements under Subtitle C of the Resource Conservation and Recovery Act. These materials include mercury, used oil, and PCBs (see 40 CFR Parts 273, 279 and 761). b) We are glad to see that this section includes a list of practices to conserve water and energy (e.g., turning off lights when not in use, switching the rotation of ceiling fans in changing seasons, purchasing ENERGY STAR appliances and electronics). The example of "purchasing ENERGY STAR® appliances and electronics" should be modified to state "replacing older, inefficient appliances and electronics with ENERGY STAR appliances and electronics" so as to capture the additional benefit associated with removing older appliances from the grid.			The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).

Task Group 3

Chapter 6 Resource Efficiency

HPC #	Log ID	Full Name Company Jurisdiction Entity Represented	Section Number Requested Action	Comment	Proposed Resolution	TG Action	Reason
HPC 007	755	Derek Huetinck BeaconCrest Homes MNCBIA Green Building Committee	601.1 Conditioned Floor Area Delete without substitution	There is insufficient scientific data to demonstrate that the building of smaller homes leads to an overall decrease in energy efficiency. Smaller homes may house fewer people than larger homes, which could potentially result in more energy consumption per person than more people living in a larger home. It is inappropriate to penalize the building of larger homes without proper data to support the concept that they will lead to greater energy consumption.	[No change from 2008 language.]		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 008	705	Gladys Quinto Marrone BIA Hawaii BIA Hawaii	601.9 Above Grade Wall Systems Revise as follows	Bamboo is starting to take hold and is good for our mild climate.	601.9 – Would like an additional ‘wall system’ for bamboo		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 009	629	Kathleen Petrie City of Seattle, Department of Planning and Development City of Seattle, Department of Planning and Development	605.0 Intent (Recycled Construction Waste) Revise as follows	The section 605 heading should be revised to include demolition.	RECYCLED CONSTRUCTION <u>and</u> DEMOLITION WASTE		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 010	631	Kathleen Petrie City of Seattle, Department of Planning and Development City of Seattle, Department of Planning and Development	605.0 Intent (Recycled Construction Waste) Revise as follows	All nonhazardous waste should be recycled or reused, regardless of whether it is the result of construction or demolition activity. Should the term "hazardous" be defined?	605.0 Intent. <u>Nonhazardous waste generated during construction and demolition is recycled or reused.</u> All waste classified as hazardous shall be properly handled and disposed. (Points not awarded for hazardous waste removal.)		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 011	638	Kathleen Petrie City of Seattle, Department of Planning and Development City of Seattle, Department of Planning and Development	605.0 Intent (Recycled Construction Waste) Revise as follows	General Comment: It would be good to see the waste diversion section further developed to include demolition and land-clearing diversion, higher percentages of diversion, the disallowance of alternative daily cover as diversion, and restrictions on percentage of diversion that can be used as fuel end markets.	None		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 012	708	Gladys Quinto Marrone BIA Hawaii BIA Hawaii	605.0 Intent (Recycled Construction Waste) Revise as follows	Hawaii’s recycling management is generally poor. Most builders simply “donate” to the bins at local schools for recycling, but have no receipts for doing so.	605 – accept builder photo documentation, or other proof, that material has been ‘donated’ for reuse or recycling rather than require proof from a certified recycler.		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 013	628	Kathleen Petrie City of Seattle, Department of Planning and Development City of Seattle, Department of Planning and Development	605.1 Construction Waste Management Plan Revise as follows	There should be an attempt to recycle or reuse all nonhazardous waste, whether it be construction or demolition. There should be an attempt to recycle or reuse all nonhazardous waste, whether it be construction or demolition. The State of California, draft IgCC, Portland, OR, Chicago, IL and Boulder, CO all have a diversion rates of 50%, or greater	605.1 Construction and demolition waste management plan. A construction <u>and</u> <u>demolition</u> waste management plan is developed, posted at the jobsite, and implemented with a goal of recycling or salvaging a minimum of 50 percent (by weight) of <u>nonhazardous construction and demolition</u> waste.		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).

Chapter 9 Indoor Environmental Quality

HPC #	Log ID	Full Name Company Jurisdiction Entity Represented	Section Number Requested Action	Comment	Proposed Resolution	TG Action	Reason
HPC 014	714	Gladys Quinto Marrone BIA Hawaii BIA Hawaii	901.3 Garages Revise as follows	Better definition of what constitutes a ‘carport’ is needed.	Better definition of what constitutes a ‘carport’ is needed. For example, the amount of enclosed space and amount of ventilation for garages with open block walls and windows.		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).

Task Group 5

Chapter 7 Energy Efficiency

HPC #	Log ID	Full Name Company Jurisdiction Entity Represented	Section Number Requested Action	Comment	Proposed Resolution	TG Action	Reason
HPC 015	754	Matthew Dobson Vinyl Siding Institute mdobson@vinylsiding.org	701.1.2 Minimum Prescriptive Path Requirements Revise as follows	Change for further clarity.	703.1.2.2 (3) Exterior rigid insulation <u>sheathing or siding ...</u>		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 016	769	Gary Klein Affiliated International Management, LLC Self	703.4 Water heating design, equipment, and installation Revise as follows	Waiting for hot water to arrive at fixtures wastes energy as well as water. In fact, the waste of energy gets worse as the flow rate goes down because the amount of water wasted goes up as the flow rate goes down. In multi-family buildings, a demand recirculation system can reduce the hours of operation of a typical system to less than 2 hours per day in retrofit applications, even lower in new buildings where the hot water piping is installed in accordance with the NGBS. There is electricity saved by reduced pumping energy, but the big savings is in the reduced heat loss in the loop. The reason for the large number of points is that water heating in multi-family buildings is equal to or larger than space heating in much of the country now and will certainly be true in buildings built in accordance with the NGBS.	New Sections Demand recirculation system is installed in single family units. Points awarded per circulation zone 1 Maximum points per building 2 Demand recirculation system is installed in multi-family units in place of a standard circulation pump and control. Points awarded per circulation zone 2 Maximum points per building 4		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).
HPC 017	761	Gary Klein Affiliated International Management, LLC Self	703.4.1 Water Heater Energy Factor Revise as follows	Electric instantaneous water heaters come in a wide variety of sizes (kW) and can be located very close to the points of use. This can reduce the energy needed for heating water by as much as 50 percent. Even when not located closer to the points of use, they are more efficient to operate than electric storage water heaters. They should be included in the table within the standard in the same way that gas instantaneous water heaters are.	Add a new line to Table 703.4.1(1)(b) Size (gallons Energy Factor ¹ POINTS <u>Any</u> <u>0.97</u> <u>10</u> <u>1. Electric instantaneous water heaters have either an Energy Factor (capacity less than or equal to 12 kW) or a Thermal Efficiency (capacity greater than 12kW)</u>		The public comment is not relevant to the changes shown in the Draft Standard (September 23, 2011).