

Public Comments for Coordination TG

On the Development of the

2020 National Green Building Standard

December 3, 2018

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Chapter 2: Definitions

PC003 LogID 6109	202 Definitions	Final Formal Action: TBD
Submitter:	Josh Hanson, self	
Comment:	<u>AUTHORITY HAVING JURISDICTION - An organization, office, or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure</u>	
Reason:	AHJ is used throughout the manual but it is not truly defined.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC005 LogID BC01	202 Definitions and Entire Standard	Final Formal Action: TBD
Submitter:	Amy Schmidt; The Dow Chemical Company	
Comment:	Modify by adding the underlined language in the text above as to remain consistent with the current scope of the standard: Sleeping Unit: A room or space <u>in a building which is 3 stories or less in height above grade</u> in which people sleep, which can also include permanent provisions for living, eating, and either sanitation or kitchen facilities but not both. Such rooms and spaces that are also part of a dwelling unit are not sleeping units.	
Reason:		
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC006 LogID BC02	202 Definitions and Entire Standard	Final Formal Action: TBD
Submitter:	Theresa Weston; DuPont Building Innovations	
Comment:	It is not clear to me whether the comment we are voting on is just the definition as shown in the original monograph or the definition and the changes shown in the ballot attachment. Each of the document changes shown in the ballot attachment should be evaluated individually (or at least by section) for appropriateness.	
Reason:	Secretariat Note: As a point of clarification, the change included the definition of Sleeping Unit (provided below for convenience) and all corresponding changes throughout the Standard where the term Sleeping Unit was added. Sleeping Unit: A room or space in which people sleep, which can also include permanent provisions for living, eating, and either sanitation or kitchen facilities but not both. Such rooms and spaces that are also part of a dwelling unit are not sleeping units.	

Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC008 LogID 6263	202 Definitions	<i>Final Formal Action: TBD</i>
Submitter:	Paul Gay, self	
Comment:	<p>Reclaimed water (and other sections) make reference to Authority Having Jurisdiction)</p> <p>add a definition for Authority Having Jurisdiction eg "An organization, office, or individual responsible for enforcing the requirements of a code or standard, or for approving equipment, materials, an installation, or a procedure." taken from NEC</p> <p>PS. "Authority"spelled incorrectly in reclaimed water</p>	
Reason:	Having the definition for AHJ makes it clearer for all as to who should be contacted or made aware and helps identify exactly who's requirements are to be followed	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC009 LogID 6264	202 Definitions	<i>Final Formal Action: TBD</i>
Submitter:	Paul Gay, self	
Comment:	Add examples of what a sleeping unit could be	
Reason:	as written this definition is confusing to me, some example would help clarify	
Substantiating Documents:		
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

Chapter 3: Compliance Method

PC014	LogID 6079	301.1.1 Non-residential spaces	Final Formal Action: TBD
Submitter:	Susan Gitlin, US Environmental Protection Agency		
Comment:	As seen in the Referenced Documents appendix, the intent is to refer to IGCC 2018. However, this code was published only towards the end of the current NGBS public comment period. Any reviewer that attempted to review the NGBS draft prior to the publication of the 2018 IGCC would not have had the code available for review or would have referred to the 2015 version. Given that the 2018 version is significantly different than the 2015 version, reviewers need to be given a chance to review and comment on the reference in NGBS to the 2018 code, as it affects the use and outcomes of NGBS.		
Reason:	Availability of referenced publications is essential to full public review.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC015	LogID 6085	303.1 Compliance options	Final Formal Action: TBD
Submitter:	Susan Gitlin, US Environmental Protection Agency		
Comment:	<p>303.1 Compliance options. The criteria for new buildings shall be in accordance with Section 303.2 for Residential buildings, the residential portion of mixed use buildings, or mixed-use buildings or Section 303.3 for compliance for single family homes, townhomes, and duplexes</p> <p>303.3 Green single family homes, townhomes, and duplexes. Single family homes, townhomes, and duplexes that meet all applicable requirements of Chapter 12 shall be deemed Certified.</p> <p>Chapter 12: Certified Compliance Path for Single Family Homes, Townhomes and Duplexes Sections: 1200 thru 1206.2</p>		
Reason:	<p>The proposed Chapter 12 offers a new path to certification to the National Green Building Standard. Any alternate path should offer homes with a) higher human health and environmental attributes than those contained in a conventionally built home and b) a level of environmental and human health attributes not distant from the level required to achieve bronze certification under the credit path. We are concerned, however, that the set of provisions in Chapter 12 do not meet these criteria: they do not sufficiently go beyond typical building practices nor would they lead to homes that merit a “green building” certification. Such a departure from the existing standard overly lowers the bar and could undermine the use of the rating system. We therefore recommend that Chapter 12 be deleted in its entirety. Single-family home construction is an area of opportunity for achieving sustainability. In 2009, EPA released Sustainable Materials Management: The Road Ahead, which provides an analysis of the major materials, products, and services in the U.S. economy and their associated environmental impacts. The report ranks 480 materials, products and services based on 17 environmental impact categories. The construction of new single-family homes rose to the top as one of the most significant sources of life cycle environmental and resource use impacts in the U.S. EPA’s further study, Analysis of the Life Cycle Impacts and Potential for Avoided Impacts Associated with Single-Family Homes details the types and relative magnitudes of these impacts. Multiple strategies can potentially lessen or offset the life cycle impacts of the single family homes, including optimizing the sizes of homes, enabling deconstruction to increase the reuse and recycling of building materials at end of service lives, increasing reuse and recycling, minimizing stormwater runoff, etc. Nonetheless, such standards have not been included in Chapter 12; for example, the Chapter 12 resource efficiency subsection is contingent on meeting requirements largely deemed mandatory in Chapter 6. Conformity to a set of requirements may generally be sufficient for driving the baseline construction, but the baseline construction that Chapter 12 appears to be driving appears fairly limited. Moreover, the whole approach of having to</p>		

	meet only a set of basic requirements fails to incentivize innovation. A more thoughtful approach than what is proposed in NGBS, includes a broader set of required as well as encouraged practices and strategies, in order to both drive the baseline and also spark trailblazing. By encouraging and recognizing innovation within the single family home construction market, Home Innovation can demonstrate that innovation is possible and feasible and go further in bringing a more meaningful market shift.
Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

Chapter 12: Certified Compliance Path for Single-Family Homes, Townhomes, and Duplexes

PC236	LogID 6342	1200 Substitution of practices	Final Formal Action: TBD
Submitter:	Craig Conner, self		
Comment:	<p>1200 Substitution of practices. The adopting entity shall be permitted to substitute one or more practices with alternatives that achieve the overall intent of this standard. The determination of intent and equivalency is in the purview of the adopting entity.</p> <p><u>1200.1 Local regulations. Where an item in this chapter would violate local laws or ordinances, that item shall not be required.</u></p>		
Reason:	Specific items in this chapter should not violate local regulation.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC237	LogID 6337	1201.3 & 1201.5 Soil preparation for new plants.	Final Formal Action: TBD
Submitter:	Craig Conner, self		
Comment:	<p>1201.3 Soil preparation for new plants. Soil shall be tilled or new soil shall be added down 6" for new plants and 12" for new trees. Soil shall be amended with organic matter, such as mulch or compost, as needed. Long acting sources of nutrients shall be added if the soil is deficient.</p> <p>1201.5 Soil preparation for new plants. <u>Alternately,</u> the landscaping plan shall incorporate the jurisdictional Department of Transportation (DOT) specifications (or equal) for soil preparation and amendment for landscape planning. If regional conditions provide an alternative for planting (for instance, in drought or water challenged areas) that alternative shall be REQUIRED <u>required</u> as a part of the landscape plan.</p>		
Reason:	These have the same title. Merge the two soil preparation sections. The two sections seem to be providing two different ways to get to the same goal? Maybe they can just be two alternatives?		
Substantiating Documents:			
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC238	LogID 6076	1201.5Soil preparation for new plants	Final Formal Action: TBD
Submitter:	Greg Johnson, Outdoor Power Equipment Institute		
Comment:	<p>1201.5Soil preparation for new plants. The landscaping plan shall incorporate the jurisdictional Department of Transportation (DOT) specifications (or equal) for soil preparation and amendment for landscape planning. <u>Other qualified sources such as University or county agricultural extension services shall be permitted for use.</u> If regional conditions provide an alternative for planting (for instance, in drought or water challenged areas) that alternative shall be REQUIRED as a part of the landscape plan.</p>		

Reason:	The "If regional conditions ..." language is imprecise as it does not identify who might be responsible for providing the alternative to be followed. University r county extensive services will be able to provide the most appropriate specifications for local conditions. Also, it is inappropriate for the standard to require compliance with unknown provisions.
Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC239 LogID 6164	1201.5 Soil preparation for new plants	Final Formal Action: TBD
Submitter:	Josh Hanson, self	
Comment:	Remove section 1201.5 or combine with Section 1201.3	
Reason:	There are two measures for Soil Preparation. We should either combine the measure or eliminate 1201.5	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC240 LogID 6322	1202.7 Flashing	Final Formal Action: TBD
Submitter:	Miranda Hardin, self	
Comment:	Flashing details shall be provided in the construction documents and shall be in accordance with the fenestration manufacturer's instructions	
Reason:	Not all single family home builders have detailed plan drawings. I think this may be a barrier if required. I believe that inspection on site of the flashing done correctly is sufficient.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC241 LogID 6323	1202.11 Visible Suspect Fungal Growth	Final Formal Action: TBD
Submitter:	Miranda Hardin, self	
Comment:	Relative humidity within the structure shall be controlled during construction <u>after HVAC start up</u> so as to prevent the potential for microbial growth.	
Reason:	There is no way to control the humidity in a home, especially in a hot/humid climate, during the entire construction phase. If that is what is needed, then some more guidance would be needed as to how to accomplish that.	
Substantiating Documents:	No	
Task Group Recommendation:		

Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC242 LogID 6344	1202.14 Roof Water Discharge.	Final Formal Action: TBD
Submitter:	Craig Conner, self	
Comment:	1202.14 Roof Water Discharge. Gutters shall discharge 5' from building, onto paved surfaces, or <u>Alternately water shall discharge</u> into areas designed to infiltrate drainage into the ground or to water vegetation.	
Reason:	Make it clear these are both options. The roof water discharge needs to clearly state that taking water out 5 ft from building is sufficient by itself. It also should retain the option of infiltrating into the ground at the site or development level. Infiltration has big impact on storm water runoff and can reduce builder costs for stormwater management.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC243 LogID 6165	1202.14 Roof Water Discharge	Final Formal Action: TBD
Submitter:	Josh Hanson, self	
Comment:	Gutters shall discharge 5' from building, onto paved surfaces, or into areas designed to infiltrate drainage into the ground or to water vegetation. <u>Due site limitations, gutters that can't meet the 5' requirement may be less with a narrative explaining the situation</u>	
Reason:	Some sites are very limited in urban areas.	
Substantiating Documents:		
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC244 LogID 6308	1202.8	Final Formal Action: TBD
Submitter:	Marie Nisson, self	
Comment:	Tile backing materials. Tile backing materials installed under tiled surfaces in wet areas shall be in accordance with ASTM C1178,C1278, C1288, or C1325, <u>or D 3273</u> . Tile shall not be installed over paper-faced drywall in wet areas	
Reason:	Wallboard with a product or coating that meets ASTM D 3273 meets requirements of MR board and should be considered equivalent for use in wet areas. The ASTM Standard Test Method for Resistance to Growth of Mold on the Surface of Interior Coatings in an Environmental Chamber	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		

Task Group Vote:	
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PC245	LogID 6166	1203.3 Dampproof walls shall...	Final Formal Action: TBD
Submitter:	Josh Hanson, self		
Comment:	Remove 1203.3		
Reason:	Section 1203.3 is a duplicate of Section 1202.3		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC246	LogID 6167	1203.7 Air sealing and insulation	Final Formal Action: TBD
Submitter:	Josh Hanson, self		
Comment:	Insulation shall be installed to Grade I. Grade II and Grade III insulation shall not be permitted. Building envelope air tightness and insulation installation shall be verified to be in accordance with Section A and B.		
Reason:	The section was calling out what the insulation installation shouldn't be (Grade II and III) but not what it should actually be.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC247	LogID 6302	1203 Energy Efficiency	Final Formal Action: TBD
Submitter:	Aaron Gary, self		
Comment:	<div style="border: 1px solid black; padding: 5px;"> <p>1203.1 Mandatory requirements. The building shall comply with Sections <u>1203.1 through 1203.10</u> 701 AND 702<u>1203.11</u> (Energy Performance Path), Sections <u>1203.12 through 1203.14</u>703 (Prescriptive Path), or Section <u>1203.16</u>704 (HERS Index Target Path). Sampling shall not be permitted for this alternative compliance path.</p> <p>1203.2 Adopting entity review. A review by the Adopting Entity or approved third party shall be conducted to verify design and compliance with these energy requirements.</p> <p>1203.3 Dam-p-proof walls shall be provided below finished grade.</p> </div>		
Reason:	Chapter 12 needs to be reviewed for internal consistency of section references and numbers and typos. Above is one example of an error though more abound.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC248	LogID 6168	1203.7 Air sealing and insulation A	Final Formal Action: TBD
Submitter:	Josh Hanson, self		
Comment:	<p>Rough in test: Total leakage shall be measured with a pressure differential of 0.1 inch w.g. (25 Pa) across the system, including the manufacturer's air handler enclosure if installed at the time of the test. Registers shall be taped or otherwise sealed during the test. Testing: Building envelope tightness is tested. Testing is conducted in accordance with ASTM E-779 using a blower door at a pressure of 1.04psf (50pa). Testing is conducted after rough-in and installation of penetrations in the building envelope, including but not limited to penetrations for utilities, electrical, plumbing, ventilation and combustion appliances. Testing is to be conducted under the following conditions:"</p>		
Reason:	The wrong note was incorporated here. The section is for unit infiltration testing but the measure gave instruction for duct leakage testing.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC249	LogID 6340	1203.8 & 1203.15 High-efficacy lighting	Final Formal Action: TBD
Submitter:	Craig Conner, self		
Comment:	<p>1203.8 High-efficacy lighting. A minimum of 90 95 percent of the total hard-wired lighting fixtures or the bulbs in those fixtures qualify as high efficacy or equivalent.</p> <p>1203.15 High-efficacy lighting. A minimum of 95 percent of the total hard-wired lighting fixtures or the bulbs in those fixtures qualify as high efficacy or equivalent.</p>		
Reason:	The two lighting high-efficacy levels should be the same.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC250	LogID 6339	1203.10 Clothes washers	Final Formal Action: TBD
Submitter:	Craig Conner, self		
Comment:	1203.10 Clothes washers. <u>Where installed</u> , clothes washers rated with an IWF (integrated water factor),MEF (modified energy factor), or IMEF (integrated modified energy factor), shall be rated as follows		
Reason:	This requirement applies only if clothes washers are installed.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

<p>PC251 LogID 6273</p>	<p>1203.11.1 IECC analysis. <i>Final Formal Action: TBD</i></p>
<p>Submitter:</p>	<p>Neil Leslie, self</p>
<p>Comment:</p>	<p>Delete the following without substitution:</p> <p>Energy efficiency features are implemented to achieve energy cost or site energy or source energy performance that exceeds the IECC by 7.5 percent.</p>
<p>Reason:</p>	<p>Adding this option under the guise of "flexibility" creates a new, technically flawed path to electrification of options in a mixed fuel building that are neither cost-justified nor justified on a source energy savings basis. The site energy option is not needed in an all-electric building calculation as site energy, energy cost, and source energy calculations would lead to the same answer in an all-electric building. The impact of this change is limited to mixed fuel buildings, providing the opportunity to use the standard to unfairly encourage substituting electric options for natural gas or propane options. The "flaw" in the source energy conversion factor noted in the justification may ultimately be a good proxy for marginal source energy impacts, which would send reasonable and fair market and decision making signals in the standard. In any event, the "counterproductive result" does not materially impact the result when using a source energy performance calculation and should not be used as the key rationale for substituting site energy for either energy cost or source energy calculations. Site energy calculations will introduce an unnecessary and technically unsupportable inconsistency with IECC calculations that are based either on energy cost or source energy. This change is not in the best interests of the standard, nor is it fair to the natural gas ratepayers or propane consumers adversely impacted by flawed results using site energy savings as the basis of the certification level. Inherent problems with site energy An energy metric obtained by adding the energy content of two different fuels without a weighting factor creates nonsense, and qualifying a building rating level by meeting a reduction in use based on that metric creates perverse incentives that can be avoided using the other metrics contained in the 2015 version of ICC 700. For a metric based on the addition of two quantities to make sense, it is necessary that the two quantities be fungible—that one can completely substitute for another. There is no plausible theory of value that allows one joule of gas to be substituted for one joule of electricity. Electricity can do things that gas cannot, because it has lower entropy. Thus it is inherently worth more. (This value in thermodynamics is reflected in the relative pricing of electricity and in the relative source energy consumption) Adding something that is worth more to something that is worth less produces confusion and nonsense; using a metric based on that addition leads to the wrong outcomes. If I return from Mexico with 100 pesos and 100 dollars in my pocket, it would not make sense to say I had 200 "desos". If I tried to do so, I would undervalue the dollars and waste them, and overvalue the pesos and save them when it would be better to spend them. Electricity is a superior good worth a lot more than gas: electricity costs much more, and it consumes more primary energy. Making electricity and natural gas equal on a site energy basis when any conceivable measure of impact has them unequal is like being paid or getting invoices in "desos": it leads the user to the wrong decision. Thermodynamically, one joule of natural gas is worth a lot less than one joule of electricity, because electricity is work—it has zero entropy—while gas can only be used by combustion that produces work with an efficiency of at best 55% in large-scale power supply applications and in average circumstances less than 40%. In buildings, burning natural gas produces low-temperature (~40-50°C) heat from combustion energy at higher temperature and entropy. Adding the two—electricity and gas—as if they were the same quantity ("energy") makes no sense: they are not the same thing, but are only denominated in the same units. It would be like adding a Reynolds number to an efficiency, arguing that since they are both dimensionless, they can be compared. Using site energy makes it relatively easier for an all-electric building to qualify for a building rating level than a mixed fuel building, creating unfairness. This issue is not just about fuel choice however. The most highly used and cost effective retrofits in homes reduce lighting and plug load energy. For a mixed fuel building, they would reduce electricity use by a lot but are likely to increase gas use to compensate for the loss of internal load. Using site energy, an internal loads reduction in a decently insulated building in a cold climate would increase its site EUI. Because gas at a delivered efficiency of 90% is needed to compensate for the loss of internal gains at an efficiency of 100%, a 1 joule reduction in loads will cause a 1.1 joule increase in site heating energy, making it look</p>

	like a bad investment during many hours of the year, even though energy costs and source energy would both be reduced. This masks the value of reducing internal loads and creates a disincentive to reduce electricity consumption compared to reducing natural gas consumption in a mixed fuel building.
Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC252 LogID 6292	1203.11.1 IECC analysis	Final Formal Action: TBD
Submitter:	Neil Leslie, self	
Comment:	1203.11.1 IECC analysis. Energy efficiency features are implemented to achieve energy cost or site energy or source energy performance that exceeds the IECC by 7.5 percent. A documented analysis using software in accordance with IECC, Section R405, is required. <u>For heating systems, the standard reference design shall be an air source heat pump. For service water heating, the standard reference design shall be an electric resistance storage water heater. For cooling systems, the standard reference design shall be an air cooled split system air conditioner.</u>	
Reason:	A single technology-blind baseline performance requirement is critical for a uniform and consistent implementation of the Standard 700 primary intent. Shifting to a single baseline design provides an equitable credit to all technologies that have lower annual costs compared to the single baseline level irrespective of energy form or technology design. It establishes fixed reference home performance requirements BEFORE making the technology and energy choices for the rated home. A single reference design methodology creates a level playing field for all technology and energy forms and provides equitable treatment of advanced renewable, waste heat recovery, hybrid, and multi-fuel technology options. It is especially important for equitable and consistent evaluation of on-site power generation and combined heat and power systems. With the tighter linkage to ASHRAE Standard 189.1/IgCC based on the scope change to ICC 700, it is even more important to be consistent with that green code/standard which uses a single baseline for its performance path in Standard 189.1 Appendix C. The "inconsistency" with IECC noted in the committee reasoning for rejecting the previous proposal is not relevant to the objective of this comment. The section 12 provisions are inconsistent with Section 305.2.5.1 compliance requirements that already use a single baseline for comparison with the improvement. ICC 700 is also inconsistent with IECC provisions in its assignment of points for higher efficiency options. However, the remaining inconsistency with IgCC is significant if the single baseline approach is not adopted in ICC 700. This comment provides the needed consistency for more equitable implementation of the performance path in ICC 700. Note that it will be critical to reject the site energy option as well to avoid unfair electrification of mixed fuel homes to improve their site energy performance while worsening their energy cost or source energy performance.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC253 LogID 6170	1203.11.2 Energy performance analysis	Final Formal Action: TBD
Submitter:	Josh Hanson, self	
Comment:	Move this section above 1203.11.1 (same in 703)	
Reason:	It looks out of order. The description of the Energy Performance Analysis should come first then the criteria to meet the energy analysis.	

Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC254 LogID 6081	1203.12.1.2 R-values and fenestration requirement <i>Final Formal Action: TBD</i>																
Submitter:	Carl Seville, SK Collaborative																
Comment:	<p>Add column to table 402.1.2 to the right of "Ceiling U Factor" Labeled "Air Impermeable Roofline Insulation Option" as follows:</p> <table border="1"> <thead> <tr> <th><u>ClimateZone</u></th> <th><u>Insulated Roofline U Factor</u></th> </tr> </thead> <tbody> <tr> <td>1</td> <td>.04</td> </tr> <tr> <td>2</td> <td>.04</td> </tr> <tr> <td>3</td> <td>.04</td> </tr> <tr> <td>4 Except Marine</td> <td>.033</td> </tr> <tr> <td>5 and Marine 4</td> <td>.033</td> </tr> <tr> <td>6</td> <td>.033</td> </tr> <tr> <td>7 and 8</td> <td>.029</td> </tr> </tbody> </table>	<u>ClimateZone</u>	<u>Insulated Roofline U Factor</u>	1	.04	2	.04	3	.04	4 Except Marine	.033	5 and Marine 4	.033	6	.033	7 and 8	.029
<u>ClimateZone</u>	<u>Insulated Roofline U Factor</u>																
1	.04																
2	.04																
3	.04																
4 Except Marine	.033																
5 and Marine 4	.033																
6	.033																
7 and 8	.029																
Reason:	<p>Insulated rooflines perform better than unconditioned attics, however the insulation level required on the roofline is significantly lower than ceiling insulation to achieve this higher performance. Ducts are also encouraged to be installed in conditioned space. Through energy modeling and in some state energy codes, trade off allowances, lower insulation values in insulated rooflines provide equivalent performance. In commercial energy codes these lower U and R values are explicitly stated for insulated rooflines. It is appropriate that similar allowances are included in residential construction which will encourage this practice. By allowing more moderate roofline insulation with either spray foam or continuous rigid board in lieu of ceiling insulation, builders will be more likely to take this route than if they are required to install the same level of insulation in rooflines as is required for ceilings. This proposal is intended to be an alternate option for roofline insulation instead of ceiling insulation - one of the other would be required.</p>																
Substantiating Documents:	No																
Task Group Recommendation:																	
Modification of Comment:																	
Task Group Reason:																	
Task Group Vote:																	

PC255 LogID 6058	1203.16.1 HERS index target compliance <i>Final Formal Action: TBD</i>
Submitter:	Susan Gitlin, US Environmental Protection Agency
Comment:	<p>1203.16.1 HERS index target compliance. Energy efficiency features are implemented to achieve a HERS Index performance that is 8 points less than the EPA <u>National ERI HERS Index Target</u></p> <p>Procedure for Energy Star Qualified <u>Certified</u> Homes version <u>Version 3.0</u> as computed based on Steps "1a" through "1d3" of the EPA National <u>ERI HERS Index Target</u> Procedure.</p>
Reason:	<p>Please update existing references to the ENERGY STAR Certified Homes program to reflect the latest program documents. These updated references will not change the overall intent of the NGBS standard. Rather, they will reflect the latest refinements, improvements, and clarifications that EPA has integrated into its program documents.</p>

Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC256 LogID 6201	1204.1 Lavatory faucets	Final Formal Action: TBD
Submitter:	Cambria McLeod, Kohler	
Comment:	1204.1 Lavatory faucets. Water-efficient lavatory faucets in bathroom shall have a maximum flow rate of 1.5 gpm (5.687 L/min), tested at 60 psi (414 kPa) in accordance with ASME A112.18.1/ <u>CSA B125.1</u>	
Reason:	Aligning the metric equivalent from the ASME standard (5.7L/min). Correcting the standard to reflect it is harmonized with CSA.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC257 LogID 6202	1204.2 Water Efficiency	Final Formal Action: TBD
Submitter:	Cambria McLeod, Kohler	
Comment:	1204.2 Water closets shall have an effective flush volume of 1.28 gallons or less <u>and in accordance with the performance criteria of the U.S. EPA WaterSense Specification for tank-type toilets.</u> and shall meet a minimum MaP threshold of 350 and/or shall be WaterSense.	
Reason:	WaterSense includes a 350g bulk waste removal but also requires that other important performance criteria be met. WaterSense is now a fully authorized program (recently in 2018) and is supported by plumbing manufacturers International, which represents plumbing manufacturers that sell over 90% of the plumbing products in the U.S.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC258 LogID 6055	1204.3 Irrigation Systems	Final Formal Action: TBD
Submitter:	Gerald Coons, Greenscapes Alliance	
Comment:	1204.3 – We support the addition of this section.	
Reason:	Promotes the use of efficient irrigation systems.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		

Task Group Reason:	
Task Group Vote:	

PC259	LogID 6324	1204.3 Irrigation Systems	Final Formal Action: TBD
Submitter:	Miranda Hardin, self		
Comment:	3) The irrigation system(s) is controlled by a climate-based controller <u>or</u> soil moisture controller or no irrigation is installed. 4) <u>No irrigation is installed</u>		
Reason:	It just makes better sense to have the no irrigation option by itself so when creating a checklist or doing field verification it is clear which option they chose.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC260	LogID 6345	1204.4 Alternative Compliance Path	Final Formal Action: TBD
Submitter:	Craig Conner, self		
Comment:	1204.4 Alternative Compliance Path. Water Rating Index (WRI) needs to achieve set a level of 75 <u>70</u> .		
Reason:	Correct the WRI level, which was meant to be 70. The 75 would make the certified path easier than the lowest level in NGBS.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC261	LogID 6338	1204.4 Alternative Compliance Path.	Final Formal Action: TBD
Submitter:	Craig Conner, self		
Comment:	1204.4 Alternative Compliance Path. Water Rating Index (WRI) needs to achieve set level 75 <u>70</u>		
Reason:	Correcting the WRI score.		
Substantiating Documents:	No		
Task Group Recommendation:			
Modification of Comment:			
Task Group Reason:			
Task Group Vote:			

PC262	LogID 6174	1205.3 Garages	Final Formal Action: TBD
Submitter:	Josh Hanson, self		

Comment:	1205.3 Garages. Garages shall be in accordance with "a" or "b": a-Attached garage (1) Doors installed in the common wall between the attached garage and conditioned space are tightly sealed and gasketed and; (2) A continuous air barrier is provided separating the garage space from the conditioned living spaces. b-A carport is installed, the garage is detached from the building, or no garage is installed.
Reason:	Wrong chapter
Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC263 LogID 6172	1205.5 Carbon monoxide (CO) alarms	Final Formal Action: TBD
Submitter:	Josh Hanson, self	
Comment:	A carbon monoxide (CO) alarm shall be provided in accordance with IRC Section R315 in any dwelling unit with a combustion fueled appliance or attached garage with an opening that communicates with the dwelling unit.	
Reason:	Even if there is not an opening into the building but a garage is under roof with a residential space be it a home or dwelling units there should be a CO monitor. I think of this as a CYA measure.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC264 LogID 6173	1205.8 Whole Dwelling Ventilation	Final Formal Action: TBD
Submitter:	Josh Hanson, self	
Comment:	(1) <u>Continuous</u> exhaust air ventilation system equipped with outdoor air ducts and intake(s) for ventilation air (2) <u>Demand-Controlled</u> exhaust air ventilation system equipped with outdoor air ducts and intake(s) for ventilation air and with automatic ventilation controls to limit ventilation air during periods of extreme temperature, extreme humidity and/or during times of peak utility loads (3) <u>Continuous Supply</u> air ventilation system (4) <u>Demand-Controlled</u> supply air ventilation system equipped with automatic ventilation controls to limit ventilation air during periods of extreme temperature, extreme humidity and/or during times of peak utility loads	
Reason:	We should add notes as described above since people will key in on continuous or demand controlled to know the type of ventilation strategy. They are trigger words	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		

Task Group Vote:	
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PC265 LogID 6171	1205.4 Carpets	<i>Final Formal Action: TBD</i>
Submitter:	Josh Hanson, self	
Comment:	water closets and bathing fixtures , <u>bathrooms, kitchens, laundry rooms or any other areas with the potential for water damage and</u>	
Reason:	We should be a little more specific here. Plus there are usually dishwasher, possibly clothes washers in or near the kitchen and laundry areas that can cause damage. Currently it looks like we are only concerned with bathrooms.	
Substantiating Documents:		
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC266 LogID 6325	1205.4 Carpets	<i>Final Formal Action: TBD</i>
Submitter:	Miranda Hardin, self	
Comment:	a) <u>water closets and bathing fixtures and kitchens</u>	
Reason:	The kitchen is obviously somewhere you would not want carpet and follows other above code program protocols.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC267 LogID 6014	1205.6 Interior Architectural Coatings	<i>Final Formal Action: TBD</i>
Submitter:	Josh Jacobs, UL	
Comment:	<p>1205.6 Interior Architectural Coatings. A minimum of 85 percent of the interior architectural coatings are in accordance with one or more of the following:</p> <p>(1) Zero VOC as determined by EPA method 24 (VOC content is below the detection limit for the method)</p> <p>(2) Green Seal-GS-11</p> <p>(3) CARB Suggested Control Measure for Architectural Coatings (see Table 901.9.1).</p> <p>1205.6 Product Emissions</p> <p>1205.6.1 Interior architectural coatings. A minimum of 85 percent of the interior architectural coatings are in accordance with either Section 1205.6.1.1 or Section 1205.6.1.3, not both. A minimum of 85 percent of architectural colorants are in accordance with Section 1205.6.1.2.</p> <p>Exception: Interior architectural coatings that are formulated to remove formaldehyde and other aldehydes in indoor air and are tested and labeled in accordance with ISO 16000-23, Indoor air -- Part 23: Performance test for evaluating the reduction of formaldehyde concentrations by sorptive building materials.</p> <p>1205.6.1.1 Site-applied interior architectural coatings, which are inside the water proofing envelope, are in accordance with one or more of the following: 5</p> <p>(1) Zero VOC as determined by EPA Method 24 (VOC content is below the detection limit for the method)</p>	

(2) GreenSeal GS-11

(3) CARB Suggested Control Measure for Architectural Coatings (see Table 901.9.1).

Table 1205.6.1.1

VOC Content Limits For Architectural Coatings^{a,b,c} Coating Category LIMIT^d (g/l)

Flat Coatings 50

Non-flat Coatings 100

Non-flat High-Gloss Coatings 150

Specialty Coatings:

Aluminum Roof Coatings 400

Basement Specialty Coatings 400

Bituminous Roof Coatings 50

Bituminous Roof Primers 350

Bond Breakers 350

Concrete Curing Compounds 350

Concrete/Masonry Sealers 100

Driveway Sealers 50

Dry Fog Coatings 150

Faux Finishing Coatings 350

Fire Resistive Coatings 350

Floor Coatings 100

Form-Release Compounds 250

Graphic Arts Coatings (Sign Paints) 500

High Temperature Coatings 420

Industrial Maintenance Coatings 250

Low Solids Coatings 120e

Magnesite Cement Coatings 450

Mastic Texture Coatings 100

Metallic Pigmented Coatings 500

Multi-Color Coatings 250

Pre-Treatment Wash Primers 420

Primers, Sealers, and Undercoaters 100

Reactive Penetrating Sealers 350

Recycled Coatings 250

Roof Coatings 50

Rust Preventative Coatings 250

Shellacs, Clear 730

Shellacs, Opaque 550

Specialty Primers, Sealers, and Undercoaters 100

Stains 250

Stone Consolidants 450

Swimming Pool Coatings 340

Traffic Marking Coatings 100

Tub and Tile Refinish Coatings 420

Waterproofing Membranes 250

Wood Coatings 275

Wood Preservatives 350

Zinc-Rich Primers 340

a. The specified limits remain in effect unless revised limits are listed in subsequent columns in the table.

b. Values in this table are derived from those specified by the California Air Resources Board, Architectural Coatings Suggested Control Measure, February 1, 2008.

c. Table 901.9.1 architectural coating regulatory category and VOC content compliance determination shall conform to the California Air Resources Board Suggested Control Measure for Architectural Coatings dated February 1, 2008.

d. Limits are expressed as VOC Regulatory (except as noted), thinned to the manufacturer's

maximum thinning recommendation, excluding any colorant added to tint bases.
e. Limit is expressed as VOC actual.

1205.6.1.2 Architectural coating colorant additive VOC content is in accordance with Table 901.9.2. 1 (Points for 1205.6.1.2 are awarded only if base architectural coating is in accordance with 1205.6.1.1.)

Table 1205.6.1.2
VOC Content Limits for Colorants

Colorant LIMIT (g/l)
Architectural Coatings, excluding IM Coatings 50
Solvent-Based IM 600
Waterborne IM 50

1205.6.1.3 Site-applied interior architectural coatings, which are inside the waterproofing envelope, are in accordance with the emission levels of CDPH/EHLB Standard Method v1.1. Emission levels are determined by a laboratory accredited to ISO/IEC 17025 and the CDPH/EHLB Standard Method v1.1 in its scope of accreditation. The product is certified by a third-party program accredited to ISO 17065, such as, but not limited to, those found in Appendix D. **8**

1205.6.2 Floor materials. The following types of finished flooring materials are used. The materials have emission levels in accordance with CDPH/EHLB Standard Method v1.1. Product is tested by a laboratory with the CDPH/EHLB Standard Method v1.1 within the laboratory scope of accreditation to ISO/IEC 17025 and certified by a third-party program accredited to ISO 17065, such as, but not limited to, those in Appendix D.

1

8 max

(Points are awarded for every 10% of conditioned floor space using one of the below materials.)

(1) Hard surface flooring: Prefinished installed hard-surface flooring is installed. Where postmanufacture coatings or surface applications have not been applied, the following hard surface flooring types are deemed to comply with the emission requirements of this practice:

- (a) Ceramic tile flooring**
- (b) Organic-free, mineral-based flooring**
- (c) Clay masonry flooring**
- (d) Concrete masonry flooring**
- (e) Concrete flooring**
- (f) Metal flooring**

(2) Carpet and carpet cushion is installed.

(When carpet cushion meeting the emission limits of the practice is also installed, the percentage of compliant carpet area is calculated at 1.33 times the actual installed area.)

1205.6.3 Wall coverings. A minimum of 10 percent of the interior wall surfaces are covered and a minimum of 85 percent of wall coverings are in accordance with the emission concentration limits of CDPH/EHLB Standard Method v1.1. Emission levels are determined by a laboratory accredited to ISO/IEC 17025 and the CDPH/EHLB Standard Method v1.1 is in its scope. The product is certified by a third-party program accredited to ISO 17065, such as, but not limited to, those in Appendix D. **4**

1205.6.4 Interior adhesives and sealants. A minimum of 85 percent of site-applied adhesives and sealants located inside the waterproofing envelope are in accordance with one of the following, as applicable.

(1) The emission levels are in accordance with CDPH/EHLB Standard Method v1.1. Emission levels are determined by a laboratory accredited to ISO/IEC 17025 and the CDPH/EHLB Standard Method v1.1 is in its scope of accreditation. The product is certified by a third-party program accredited to ISO 17065, such as, but not limited to, those found

in Appendix D. **8**
(2) GreenSeal GS-36. 5
(3) SCAQMD Rule 1168 in accordance with Table 1205.6.4(3), excluding products that are sold in 16-ounce containers or less and are regulated by the California Air Resources Board (CARB) Consumer Products Regulations. 5

Table 1205.6.4(3)

Site Applied Adhesive and Sealants VOC Limits a,b

ADHESIVE OR SEALANT VOC LIMIT (g/l)

Indoor carpet adhesives 50

Carpet pad adhesives 50

Outdoor carpet adhesives 150

Wood flooring adhesive 100

Rubber floor adhesives 60

Subfloor adhesives 50

Ceramic tile adhesives 65

VCT and asphalt tile adhesives 50

Drywall and panel adhesives 50

Cove base adhesives 50

Multipurpose construction adhesives 70

Structural glazing adhesives 100

Single ply roof membrane adhesives 250

Architectural sealants 250

Architectural sealant primer

Non-porous 250

Porous 775

Modified bituminous sealant primer 500

Other sealant primers 750

CPVC solvent cement 490

PVC solvent cement 510

ABS solvent cement 325

Plastic cement welding 250

Adhesive primer for plastic 550

Contact adhesive 80

Special purpose contact adhesive 250

Structural wood member adhesive 140

a. VOC limit less water and less exempt compounds in grams/liter

b. For low-solid adhesives and sealants, the VOC limit is expressed in grams/liter of material as specified in Rule 1168. For all other adhesives and sealants, the VOC limits are expressed as grams of VOC per liter of adhesive or sealant less water and less exempt compounds as specified in Rule 1168.

1205.6.5 Insulation. Emissions of 85 percent of wall, ceiling, and floor insulation materials are in accordance with the emission levels of CDPH/EHLB Standard Method v1.1. Emission levels are determined by a laboratory accredited to ISO/IEC 17025 and the CDPH/EHLB Standard Method v1.1 is in its scope of accreditation. Insulation is certified by a third-party program accredited to ISO 17065, such as, but not limited to, those in Appendix D. 4

APPENDIX D

EXAMPLES OF THIRD-PARTY PROGRAMS FOR INDOOR

ENVIRONMENTAL QUALITY

TABLE D200(1)

Examples of Third-party Certification Programs

Related Section of

Standard

Examples of Third-party Certification Programs Compliant with the Corresponding Section

	<p>901.5 Cabinets Kitchen Cabinet Manufacturers Association (KCMA) Environmental Stewardship Program (ESP)</p> <p>901.6 Carpets Carpet and Rug Institute’s (CRI) Green Label Plus Indoor Air Quality Program</p> <p>901.7 & <u>1205.6.2</u> Hard-surface flooring</p> <p>UL GREENGUARD Gold Resilient Floor Covering Institute’s FloorScore Indoor Air Certification Program</p> <p>901.8 & <u>1205.6.3</u> Wall coverings UL GREENGUARD Gold Scientific Certification Systems (SCS) Indoor Advantage Gold Program</p> <p>901.9 & <u>1205.6.1</u> Architectural coatings</p> <p>UL GREENGUARD Gold Scientific Certification Systems (SCS) Indoor Advantage Gold Program</p> <p>Green Seal-11 Standard for Paints and Coatings</p> <p>UL 2768</p> <p>901.10 & <u>1205.6.4</u> Adhesives and sealants</p> <p>UL GREENGUARD Scientific Certifications Systems (SCS) Indoor Advantage Gold Program</p> <p>Carpet and Rug Institute’s (CRI) Green Label Plus Indoor Air Quality Program</p> <p>Resilient Floor Covering Institute’s FloorScore Indoor Air Certification Program</p> <p>Green Seal-36 Standard for Adhesives for Commercial Use</p> <p>901.11 & <u>1205.6.5</u> Insulation UL GREENGUARD Gold Scientific Certifications Systems (SCS) Indoor Advantage Gold Program</p>
Reason:	<p>The current proposed section 1205.6 does not actually protect indoor occupants from potentially harmful volatile organic compounds. What is listed is VOC content requirements and those were developed and are used due to the potential impact on outdoor environments, not indoor environments. Additionally, if we are wanting single-family homes to have good indoor air quality why are we ignoring source control in Chapter 12. We have requirements in Chapter 901 which give us a perfect blue print for these requirements. Most of the products that would be used to comply with Chapter 901 product emission requirements are the same exact products that would comply with the proposed Chapter 1205.6. Home builders and owners have easy access to the products for the proposal, it would not add cost as many manufacturers have their entire line of products meeting the requirements, we want to ensure that single family home have healthy indoor environments, therefore the requirements from Chapter 901 on product emissions, should be copied verbatim into this area.</p>
Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC268	LogID 6326	1205.6 Interior Architectural Coatings	Final Formal Action: TBD
Submitter:	Miranda Hardin, self		
Comment:	<p>4) <u>GREENGUARD OR GREENGUARD GOLD</u></p> <p>5) <u>Green Wise and Green Wise Gold</u></p>		
Reason:	<p>The current 3 options are very restrictive. These certifications follow similar standards and are approved to be used in the EPA Indoor Air PLUS program.</p>		
Substantiating Documents:	No		
Task Group Recommendation:			

Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC269 LogID 6341	1205.6 Interior Architectural Coatings	Final Formal Action: TBD
Submitter:	Craig Conner, self	
Comment:	1205.6 Interior Architectural Coatings. A minimum of 85 percent of the interior architectural coatings are in accordance with one or more of the following: (1) Zero <u>Low</u> VOC as determined by EPA method 24 (VOC content is below the detection limit for the method)	
Reason:	Low VOC is more practical. Does "low VOC" need a description? VOC limits do not apply to outside coatings.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC270 LogID 6327	1205.7 Spot Ventilation	Final Formal Action: TBD
Submitter:	Miranda Hardin, self	
Comment:	Spot <u>Local</u> ventilation shall be in accordance with the following:	
Reason:	The use of local ventilation is a more common way to describe the bath & kitchen exhausts.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC271 LogID 6296	1205.8 Whole Dwelling Ventilation	Final Formal Action: TBD
Submitter:	Aaron Gary, self	
Comment:	<p>SECTION202 DEFINITIONS</p> <p><u>ADD Definitions TC "202 DEFINITIONS" \f C \l"2"</u></p> <p><u>VENTILATION AIR.</u> That portion of supply air that comes from the outside (outdoors), plus any recirculated air that has been treated to maintain the desired quality of air within a designation space.</p> <p>-</p> <p><u>BALANCED AIR VENTILATION SYSTEM.</u> two or more fans that simultaneously supply outdoor air and exhaust air at substantially equal rates such that both the total supply and total exhaust flow rates meet the required fan flow rate.</p>	
Reason:	Ventilation Air and Balanced Air Ventilation System are two terms that were included in the Chapter 12 revision but not defined. Adding these definitions to the Standard provides clarity.	

Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC272 LogID 6243	1206.2 Training of initial homeowners	Final Formal Action: TBD
Submitter:	Suzanne Boxman, U.S. Environmental Protection Agency	
Comment:	<p>Requested Action: Add as follows.</p> <p>Proposed Change: <u>(5) Weather Based Irrigation Controllers</u></p>	
Reason:	WBIC save the most water and reduce runoff when properly setup, operated and maintained.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC273 LogID 6335	Chapter 12	Final Formal Action: TBD
Submitter:	Craig Conner, self	
Comment:	<p>In the energy section it needs to be clear that UA, prescriptive and U-value are all options, not individual requirement. Prescriptive table seemed to grab attention as if it was the requirement, not just an option.</p> <p>Are all the footnotes on the prescriptive insulation table needed? They make the table look complicated.</p> <p>Should remove reference to EPA 402-K-01-001 on mold. The document is for schools and commercial buildings. It would also be hard to apply as it is too much general guidance rather than specifics.</p>	
Reason:	Chapter 12 needs these clean ups.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC274 LogID BC47	Chapter 12 – Certified Compliance Path for SF Homes, Townhomes, and Duplexes	Final Formal Action: TBD
Submitter:	Amy Schmidt; The Dow Chemical Company	
Comment:	<p>I disagree with the watering down of the standard in order to gain market share of single family certifications It is not that the standard is out of line with constructible reasonable green provisions in fact it is already on of the least onerous green standards/programs on the market Similar to other performance criteria in the code like structural requirements We don't change the requirement so</p>	

	lesser performing products can enter the market as it would be disingenuous and irresponsible for us to do so to the public
Reason:	
Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC275 LogID BC48	Chapter 12 – Certified Compliance Path for SF Homes, Townhomes, and Duplexes	Final Formal Action: TBD
Submitter:	Bob Thompson; US EPA	
Comment:	This dramatically lowers the bar for the standard. Although the proposal originally was intended to increase production builders' participation in the program, this language creates a new level of certification for ALL single-family homes, townhomes, and duplexes. As most builders are likely to be just as satisfied with achieving a "certified" level as they would be with a bronze level, this effectively lowers the environmental benefits that NGBS users will achieve. In particular, this proposal allows all standard users to bypass myriad site criteria that are known to be highly correlated with the environmental performance of a building over its life time.	
Reason:		
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC276 LogID BC49	Chapter 12 – Certified Compliance Path for SF Homes, Townhomes, and Duplexes	Final Formal Action: TBD
Submitter:	R. Christopher Mathis; Mathis Consulting	
Comment:	How many compliance options are necessary? At what point does a standard become construction guide? Reducing requirements for market penetration is textbook green-washing. From the reason statement: "This compliance path would be considered below Bronze..."	
Reason:		
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC277 LogID BC50	Chapter 12 – Certified Compliance Path for SF Homes, Townhomes, and Duplexes	Final Formal Action: TBD
Submitter:	Laura Petrillo-Groh; AHRI	
Comment:	AHRI votes no. A fifth path for compliance dilutes the green building standard.	
Reason:		

Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

PC278 LogID BC51	Chapter 12 – Certified Compliance Path for SF Homes, Townhomes, and Duplexes	<i>Final Formal Action: TBD</i>
Submitter:	Theresa Weston; DuPont Building Innovation	
Comment:	I believe the limitations on when the new pathway can be used should be in the standard. The intention is that it is for large production builders who “generally don’t control land development” and the justification for the below Bronze certification is the environmental benefits from broader adoption. But I did not see any limitations that would require this path to only be used by a certain size of builder or that they are not in control of the land development.	
Reason:		
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

PC279 LogID 6169	Table 701.4.3.2 (2)	<i>Final Formal Action: TBD</i>
Submitter:	Josh Hanson, self	
Comment:	Update Table to reflect 2018 IECC table R402.1.1	
Reason:	The current table that is in the standard is jumbled and has criteria under different categories. We need to make sure it reads like the table from the 2018 IECC	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		

Chapter 14: Referenced Documents

PC311 LogID BC52	1402 Referenced Documents <i>Final Formal Action: TBD</i>
Submitter:	Gregory Curtis Coolidge; Crescent Communities
Comment:	I do not agree with updating to 2018 version of Codes because almost all jurisdictions utilize either 2012 or 2015 Codes and 2018 Code implementations could still be 3 years away which could cause groups to have to comply with Codes that are not currently active or are beyond what current Codes require
Reason:	<p><i>Secretariat Note: Comment on the following provision of the Draft Standard:</i></p> <p>IBC 2015 <u>2018</u> IECC 2015 <u>2018</u> IFGC 2015 <u>2018</u> IMC 2015 <u>2018</u> IRC 2015 <u>2018</u></p>
Substantiating Documents:	No
Task Group Recommendation:	
Modification of Comment:	
Task Group Reason:	
Task Group Vote:	

Appendices

PC312 LogID 6189	C200 CLIMATE ZONES Table C200	<i>Final Formal Action: TBD</i>
Submitter:	Josh Hanson, self	
Comment:	Update to Reference 2018 IRC currently references 2015 IRC	
Reason:	Currently references the older code vs 2018.	
Substantiating Documents:	No	
Task Group Recommendation:		
Modification of Comment:		
Task Group Reason:		
Task Group Vote:		