

Public Comments

On the Development of the

2020 ANSI Z765 Square Footage: Method for Calculating

June 3, 2020

Public Comments

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Public Comments

PC 01 – Section 2.2 Finished Area	
Submitter:	Steve Kahane, Self
Requested Action:	Revise as follows
Proposed Change:	An enclosed area in a house that is suitable for year-round use based upon its location, embodying walls, floors, and ceilings that conform to or exceed in quality, utility and climate control (HVAC) to the remainder of the house, regardless of use.
Reason:	In the public comments, there were concerns about the use of the room (closets, walk-in refrigerators, laundry) in determination of GLA. There was also discussion about the need for permanent heating or cooling per locale. One commenter asked if closets on a 2nd story knee wall were included. We wouldn't consider excluding closets on the 1st floor, why would we on the second? While a walk-in freezer is not living area, neither is the space taken up by a standard refrigerator and we wouldn't consider removing that area. Lastly regarding HVAC. If the space meets the criteria, it is gla, regardless of use. Climate control is a measure of conformity, quality and utility. As long as it meets or exceeds that of the remainder of the house it should be included, assuming all other criteria are met.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 02 – Section 2.2 Finished Area	
Submitter:	Tom Blankenship, Steve Gregory Appraisals
Requested Action:	Revise as follows
Proposed Change:	An enclosed area in a house that is suitable for year-round use based upon its <u>geographic region or location within the country</u> , embodying walls, floors, and ceilings that are similar to the rest of the house.
Reason:	Provides clarification as to what "location" refers.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 03 – Section 2.2 Finished Area	
Submitter:	Melissa Bond, Self
Requested Action:	Delete without substitution
Proposed Change:	Staff Note: <i>Reverses previously approved change, Log 02.</i> based on its location-

Reason:	By adding the words "based on its location" you have added a tremendous layer of confusion. The definition is clearly understood exactly as it is written. What exactly does "based on its location" mean... in Gross Living Area?, in Gross Building Area?, location on the site?, location in the region of the country?. Please reconsider adding this ambiguous phrase. I am a Continuing Education Provider in multiple states (on-site) and across the country (online) and I can see the plethora of questions that this very unnecessary phrase will cause. Either fully clarify what "based on its location" means or, even better, strike it from the new edition.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 04 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Robert N. Mossuto Jr
Requested Action:	Revise as follows
Proposed Change:	<p>I am not revising the ceiling height section of ANSI; but am providing some critical thought as to the usefulness of this document from an appraiser’s view when considering upper floor living space.</p> <p>There are millions of homes across this country that were built before international building code development and acceptance of international building code by the US, individual states, and municipalities within individual states in the US.</p> <p>A large number of homes built with second floors in the US have fully finished second floors with bedroom and bathrooms in which no part of the 2nd floor ceiling is 7 feet from floor to ceiling!</p> <p>So, in essence, ANSI is telling Real Estate Agents, Appraisers, Lenders, and the Consumer that that 500, 600, 700, 800 or more square feet and those 2, 3, and 4 bedrooms and many times a bathroom or half bath are all nonexistent in millions of homes across the country if we rely on ANZI standards!</p> <p>As an example, a home built in 1915 with 1,650 square feet of living space is listed and sold. The home has 4 bedrooms and 2 bathrooms. But, 3 of the bedrooms and 1 of the bathrooms are on the 650 square foot second floor. And the max ceiling height of the 2nd floor is 6 feet. So, by ANZI standards, the home is a 1,000 square foot (40% smaller), 1-bedroom, 1-bathroom home!</p> <p>An appraisal report indicating the smaller scenario would definingly confuse the consumer, tick the real estate agent off, and likely guarantee the appraiser would not get further business form the lender.</p> <p>So why would any of us rely on ANZI standards when listing, selling, appraising, or lending on the millions of homes that fall under this category? In my opinion, this standard kind of defeats the purpose of having a standard at all.</p> <p>Someone needs to rethink this one!</p>

Reason:	The ceiling height of 7 feet excludes living area, bedrooms, and bathrooms in literally millions of homes across the united states and does not reflect market reaction. It is a poor standard and one that will confuse consumers, kill sales transactions, and cause significant issues in appraisal reporting. Given this, appraisers would not use ANZI standards when appraising one of these millions of homes. So what is the point of having a standard! You need to rethink this!
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 05 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Darval Rash, SRA, Self
Requested Action:	Revise as follows
Proposed Change:	Include all stud walls for finished one half story living areas The proposal for a single wall does not make sense due to cost associated with <u>all walls and does not reflect the inclusion of dormers</u>
Reason:	Construction cost all knee walls and dormers
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 06 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	James Hollenberg, Self
Requested Action:	Revise as follows
Proposed Change:	There needs to be some clarification on Measuring upper levels with sloped ceilings. This section on page 10 of the draft is slightly confusing. It will become more confusing since it appears by the diagrams that we measure one outside wall and not the other. Typically if the outside wall goes to the outside and not an attic or open space I measure like the main level to the outside wall but if it goes to an open space in the attic I would only measure to the inside wall.
Reason:	This needs verbiage to explain the diagram and the measurements of second levels. Just like the verbiage that states only measure at the 5 foot level and the that half the are must be 7 feet height.
Substantiating Documents:	
Consensus Committee Action:	

Modification of Proposed Change:	
Reason:	

PC 07 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Patricia K Fogle, Self
Requested Action:	Revise as follows
Proposed Change:	Very confusing, adding for exterior wall on one side of sloped ceiling! Need to either add for both or not add at all.
Reason:	Very confusing.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 08 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Calvin Nay, Self
Requested Action:	Revise as follows
Proposed Change:	Sketch of level with sloped roof seems to indicate that one wall is to be included in the GLA at the 5' level This will increase confusion among appraisers
Reason:	Either add the both imaginary wall thickness or don't add EITHER wall thickness. Add a clarifying statement that clearly indicates what the standard is. Please do not confuse the issue further by adding the thickness of one wall to this measurement.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 09 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Patrick Williams, Williams Appraisal, Inc
Requested Action:	Revise as follows
Proposed Change:	For a level that extends below a 5' ceiling height, only measure to the 5' line, do NOT include any sidewalls measurements.
Reason:	Sidewall dimensions can vary greatly. Including only one sidewall does not make sense, so why do it.
Substantiating Documents:	
Consensus Committee Action:	

Modification of Proposed Change:	
Reason:	

PC 10 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Desirae P Gartman, Self
Requested Action:	Delete without substitution
Proposed Change:	I am a residential appraiser. I feel that the change would create more confusion. I think that the standard should clearly state that either the studs are counted on both walls or neither wall. One wall is confusing.
Reason:	I think that this change would cause more inconsistencies between appraisers' measurements of similar properties.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 11 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Brad Bassi, SRA, Self
Requested Action:	Add new as follows
Proposed Change:	I don't understand the sketch on the left under new figure 5 and why only one exterior stud wall is included. This current configuration will lead to a significant amount of confusion and interpretation. I understand right sketch due to wall and slope of ceiling. Left sketch is confusing and I don't understand the need for just one wall.
Reason:	I am appraising and this revision will lead to confusion. There should be either both sides include exterior wall thickness or neither should have it, not just one side.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 12 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Thomas Ingersoll, Self
Requested Action:	Revise as follows
Proposed Change:	The figure shows a knee wall at the 5 ft height. One of the other walls should show a knee wall at a height of less than 5 ft, to indicate if the knee wall thickness is only included for heights of 5 ft and above.
Reason:	The sketch as drawn, leaves an ambiguous situation, as to if you are considering one side as finished all of the time.

Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 13 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Tom Blankenship, Steve Gregory Appraisals
Requested Action:	Delete and substitute as follows
Proposed Change:	Delete the newly proposed Figure 5 to the annex and add the following language to the end of Section 3.6: <u>In rooms with sloped ceilings where actual side wall height at the ceiling is less than the 5 foot requirement, finished square footage calculations shall assume and add actual wall thickness to the dimension between the points where ceiling height is 5 feet.</u>
Reason:	This will clarify much better than the proposed change.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 14 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Christi Adams, CAdams Real Estate/Louisiana
Requested Action:	Add new as follows
Proposed Change:	Please specify where you start measuring a 5ft ceiling height (as square footage) on a second story. Why would you include the thickness of one wall and not the other? or why not none at all?
Reason:	Makes a confusing situation, more confusing, as opposed to clarifying the correct way to measure a 2nd story with ceiling heights of less than 5 feet
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 15 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Becky Ruskowski, Self
Requested Action:	Revise as follows

Proposed Change:	Add a statement about whether you include or don't include an imaginary knee wall at the 5' height and what that thickness is.
Reason:	on the sloped ceiling, It should say include or not include the imaginary wall at the 5 foot wall. Also, it should say what wall thickness should be used so that we are all consistent. As a Kentucky appraiser, we are required to use ANSI standards for measuring. This needs to be easily interpreted by the users. I don't care which way it reads as long as it is clear so we are all on the same page. Thanks for the consideration.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 16 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Melissa Bond, Self
Requested Action:	Add new as follows
Proposed Change:	Your illustration in regarding the ceiling height and its measurement is perfectly understood and appears to need no further commentary. However, please add clarification regarding the measurement from side-to-side of the room. On the right side (because the wall height is 5') the measurement is from the outside wall (encompassing the studs and exterior building component) BUT, the left side stops at the 5' mark (not accounting for the "invisible stud wall). Please provide additional commentary to the Standard such as <u>When measuring side-to-side in the sloped ceiling room, include any wall and exterior building material when the ceiling height is at least 5' or greater. When the ceiling height is less than 5' due to a sloped ceiling, do not include an additional measurement for a studded wall or the exterior building materials.</u>
Reason:	Currently, there is a confusion for adding an "invisible stud wall" or not when an Appraiser measures sloped ceiling rooms that are less than 5' in some areas. Adding this statement would provide definitive direction and more conformity in use of the Standard. Left as it is, the lack of sufficient commentary causes the user of the Standard to rely on his/her personal judgement for measuring. Thereby, causing a lack on continuity in calculating square footage. All I'm asking for is that commentary be included that aligns with your illustration.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 17 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Robert Premecz, Self
Requested Action:	Revise as follows

Proposed Change:	<p>As both an Emeritus Realtor and SRA designated appraiser, I offer the following:</p> <p>After reviewing the proposed changes, some confusion will remain with how sloped ceilings should be measured based on the revised Figure 5.</p> <p>The five (5') foot minimum in Figure 5 considers starting the measurement beyond or on the other side of the supporting five (5') foot knee wall. However, it creates an imaginary line at the five (5') foot point on the sloped ceiling. This creates a confusing bi-polar approach. In my opinion, this solution fails to follow the spirit of this standard which acknowledges and includes supporting or exterior walls in the balance of the standard.</p> <p>I suggest either two solutions to maintain internal consistency within the standard.</p> <p>1) Measure from the five (5') foot interior point, then add for a typical supporting wall (Preferred).</p> <p>2) Measure from the five (5') foot interior point(similar to the method most condominiums employ - ignores supporting walls).</p> <p>Finally, the edits to abbreviate measurements should not be done as it neither enhances the understanding or clarity of the standard, nor provides a universally accepted abbreviation for these measurements. For example, I personally use "SF" to mean square feet and have never used "sq. ft." in a form report due to space limitations.</p>
Reason:	See public comment. Please contact me if what I propose remains unclear.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 18 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Thomas Harwood, Self
Requested Action:	Add new as follows
Proposed Change:	Add a definition of outside wall.
Reason:	Clarification
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 19 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Paul Cooper, Self
Requested Action:	Add new as follows
Proposed Change:	In order to decrease confusion, when it comes to sloped ceilings, please simplify the process. My suggestion would be to keep the 5' height rule and the 70% of area rule and measure the area as if it was a condo. Very simple measurement. Measure from the inside at the 5' marks. Then everyone will have the same measurement; no guess work as to the thickness of the outside wall, whether it be one wall or two walls. All appraiser's and realtor's will produce the same square footage for the measured area, provided they do the math correctly. I very much appreciate your consideration of this idea, and thank all of you for your continued effort to standardize these measurements.
Reason:	Change sloped ceiling measurement standards.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 20 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Glynn M Bergeron, Self
Requested Action:	Revise as follows
Proposed Change:	I would like to comment on the proposed changes to ANSI. As a Real Estate Appraiser I strongly recommend that you do don't keep the proposed changes to second floor square foot calculation method of splitting the count from inside one wall to the outside of the opposite wall. Either keep it where we include the outside studs in the square footage or not count the studs in the square footage. BUT PLEASE DO NOT MAKE IT HALF AND HALF ! This will create much confusion in the real estate industry! As a teacher and trainer of Real Estate Agents and Appraiser Trainees I would highly recommend that you chose one or the other! Counting from one inside wall to the other outside wall studs will not be a good idea! Thank you for your consideration! Please feel free to call on me for input! Glynn Michael Bergeron Glynn Michael Appraisals LLC 985 381-2530
Reason:	The reason for my above statement tot help avoid confusion in the industry!!
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 21 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Patricia A Ploen, Self
Requested Action:	Delete and substitute as follows
Proposed Change:	When measuring side to side in a sloped ceiling room, include any wall and exterior stud when the ceiling height is at least 5 ft. When the ceiling height is less than 5 ft, do not include additional measurements for stud.
Reason:	Less confusing
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 22 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Jonathan Harrison, Self
Requested Action:	Revise as follows
Proposed Change:	The thickness of the structure's exterior walls shall be added to the dimensions beginning at the 5' height below a sloping ceiling.
Reason:	When measuring regular GLA, we include the exterior wall dimensions. Ditto, the basement dimensions. What if there is, in fact, a physical wall at the 5' height and it is, in fact, an exterior wall. It has to be included for the sake of consistency.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 23 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Cheryl B. Bella, Self
Requested Action:	Add new as follows
Proposed Change:	Chimneys, windows, and other finished areas that protrude beyond the exterior finished surface of the outside walls and do not have a <u>finished</u> floor on the same level cannot be included in the calculation of square footage.
Reason:	When a ceiling slopes to 5', an exterior wall thickness adjustment should be included. This makes the measurement consistent with other measurements taken to the exterior wall. The drawings indicate to exclude perimeter wall fireplaces, however in sec. 3.8 it indicates "Chimneys, windows, and other finished areas that protrude beyond the exterior finished surface of the outside walls AND do not have a floor on the same level cannot be included" A fireplace does have a floor, so this appears to contradict. If the argument is that a fireplace floor is not considered finished, then maybe the word "finished" floor should be included.
Substantiating Documents:	

Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 24 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Kristi D Cox, Kristi D Cox Appraisal Services
Requested Action:	Revise as follows
Proposed Change:	Regarding the new measurement for the second story. Please make it from the wall to wall or add thickness of the wall, either or but not both. This appears to be very confusing and lacks consistency. Thanks
Reason:	Please consider this for consistency as a yes or no statement to avoid confusion.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 25 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Tina Langton, Self
Requested Action:	Revise as follows
Proposed Change:	<p>Log 11, Section 3</p> <p>Bryan Reynolds: Section 3. Ceiling Height - This proposed change will create more confusion than clarity in the valuation profession and for other users. As a national instructor, I witness many students are already confused with this section and this attempt for clarity will fail. I strongly recommend this change not be made to this section. Darwin Ernst:</p> <p>The drawing I provided in my ballot response is more clear than the one that was provided in the ballot, but I would offer an updated version of this edited figure/image (see attached) to members based on my opinion that the upper floor measurement of all sloped ceiling heights should be restricted to the point of the sloped ceiling at the 5' mark above the floor, regardless of whether there is an exterior wall, pony wall, or any other type of wall beyond the point where the upper floor's ceiling height is 5' above the floor, so there is consistency in the upper floor measurement by all users of the standards. The proposed modification (see below) in item 11 to include the width of an exterior wall on upper floors beyond where the ceiling height reaches a point on the slope of an upper floor ceiling at a point 5' above the floor will be confusing to many potential users, so I am hopeful that we can discuss this motion further.</p>
Reason:	Agree that measuring the actual space within the 5' height requirement is the most logical and easily explained to homeowners, realtors, lenders, etc.
Substantiating Documents:	

Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 26 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Jimmy Hudspeth, Self
Requested Action:	Revise as follows
Proposed Change:	The thickness of the wall should be added for areas with a sloped ceiling having walls at or above the 5 ft. mark. For areas with a sloped ceiling in which the wall is below the 5 ft. mark, the thickness of the wall should not be added. (See New Figure 5)
Reason:	There seems to be much confusion and disagreement on whether to add for the thickness of a wall or "imaginary" wall in areas with sloped ceilings when measuring to the 5 ft. mark. I believe the above addition/modification would help to clarify whether or not to add for the thickness of a wall or "imaginary" wall. In my opinion, if a sloped ceiling extends below 5 ft., as required to be considered finished living area, then there should be no addition for an "imaginary" wall. Section 3.6 as it is, leaves a grey area which could be left up to individual interpretation. While New Figure 5 appears to clarify the intent, specific verbiage for clarification in Section 3.6 would help to insure that everyone would be more consistent in the measurement of areas with sloped ceilings.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 27 – Section 4.3 Areas Not Considered Finished Square Footage	
Submitter:	Steve Kahane, Self
Requested Action:	Add new as follows
Proposed Change:	Jurisdictional exceptions may apply for finished living areas not connected that otherwise conform in quality and utility to the remainder of the house and that are commonly included in the square footage in both the tax records and MLS listings.
Reason:	In my area, there is a subdivision where many of the houses have a detached living area often referred to as a casita. The area usually consists of a bedroom and bath that are similar in quality to the main dwelling. The spaces are usually attached somehow, either by a common wall or roof but are only accessible by walking outside the main dwelling. The houses are bought and sold with this space included in the gla and have been since the houses were new 15-20 years ago. Tax records and MLS typically include the casitas in the gla. I wouldn't typically consider this detached space part of the gla, but I do in this subdivision because the market considers it gla. This is only possible if we have the flexibility to make our own determinations of what is considered gla in a specific market.
Substantiating Documents:	

Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 28 – Section 4.3 Areas Not Considered Finished Square Footage	
Submitter:	Steve Kahane, Self
Requested Action:	Add new as follows
Proposed Change:	Areas not connected to the house refer to spaces that are not accessible from a finished area of the primary dwelling.
Reason:	"Not connected to the house" lacks specificity. Does "connected" refer to any part of the structure, the roof or just finished common walls? Does a living area conform in utility and appeal if you have to walk outside to get to it? Are quarters that share a common wall and roof connected if you have to exit the main dwelling to get there? What if it is connected only by a breezeway, is that connected? What about a finished/converted garage bay accessible only by walking through an unfinished portion of the garage?
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 29 – Commentary – Finished Stairs	
Submitter:	Melissa Bond, Self
Requested Action:	Add new as follows
Proposed Change:	<u>...of the floor from which they descend.</u>
Reason:	The statement "Finished stairs suitable for year round use ascending to an unfinished upper area are included in the square footage calculation" is just not a finished thought. Please consider adding the words " of the floor from which they descend" to the end of your sentence. This added phrase would provide a complete clarification of what level the stair calculation is to be added to. So basically, the finished stair calculation is added to an UNFINISHED upper level in the example that you have provided in the Standard Commentary. All I'm asking is that this statement be as clear and definitive as the statement that is before it.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 30 – Commentary – Staircases	
Submitter:	Kelly Jo Kosse, Self
Requested Action:	Revise as follows
Proposed Change:	We count stairs on the first floor leading to unfinished basement and crawl spaces, therefore we would include stairs on the second floor leading to unfinished bonus rooms or attics on the third floor.
Reason:	modify this rule
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 31 – Commentary – Staircase and Elevator	
Submitter:	Kelly Jo Kosse, Self
Requested Action:	Revise as follows
Proposed Change:	We include staircases as we move among floors, therefore we would include elevators
Reason:	Revise
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

Emails and Letters as Public Comments

PC 32 – Section 3.6 Ceiling Height Requirements, Figure 5		9/30/2019
Submitter:	Hamp Thomas, Carolina Appraisers	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	<p>September 30, 2019</p> <p>Mr. Wayne Foley ANSI Consensus Committee</p> <p>Dear Mr. Foley and Committee Members:</p> <p>Hello. I just finished reviewing the proposed changes for 2020. The majority of changes seem logical and beneficial, but I would like to offer a different perspective on the measurement of rooms with sloped ceilings.</p> <p>I have studied the topic of square footage for over fifteen years. After speaking to agents, appraisers, assessors, builders, and many others all across the country, I have heard many different perspectives on measuring rooms with sloped ceilings. As I'm sure you understand, this is a topic with very strong opinions on all sides. While absolutely no changes are necessary to ANSI, if changes are to be made, the goal should be to help create the most consistency in measurements among real estate professionals.</p> <p>The differences between methods of measuring sloped ceilings is only a difference of between 10-30 square feet in the majority of rooms. It's not a huge difference, but a difference in professionalism. It is a measurement that makes appraisers look bad amongst agents because the appraisers do not all handle it the same way. Under the current standard, we can have two people who are adamant that they strictly adhere to the ANSI standard. They both measure from the five-foot point on one wall to the five-foot mark on the opposite sloped ceiling. The first appraiser uses the measurement as it is, without the addition of any exterior wall. The second appraiser adds five-tenths (6") for both exterior walls, and they are both convinced they follow the ANSI Standard. That is a problem. I believe that the addition of one line would clear up this confusion. One line which states that you either "add five-tenths or six-inches for both exterior walls," or; "the measurement stops at the five-foot point on both sloped walls, without the addition of any exterior dimensions." Most appraisers don't really care which method is used, only that we all have the same rules that are easy to interpret and simple to explain to agents and homeowners. This rule needs to be simplified and not made more complicated.</p> <p>In my opinion, the proposed change, which provides for the addition of the width of one exterior wall, would only create mass confusion among practitioners who are already confused by this measurement and it would only serve to increase the debate over this measurement. Rather than to help simplify the measurement and allow for more consistency among professional measurements, this could end up having the exact opposite effect.</p> <p>We currently only have one state that mandates the ANSI standard for appraisers and none for real estate agents. After over twenty-three years in existence, there is no national acceptance of this standard, which should be able to bring together all professionals who calculate square footage for the public. I believe one of the reasons more states have not mandated ANSI is due to issues just like this, where there is a</p>	

degree of subjectivity rather than a precise rule or guideline. This measurement could be a very positive change for ANSI and help to bring about more acceptance throughout the industry.

I authored the ANSI, Home Measurement, and the Power of Price-Per-Square-Foot CE course that is being taught online and live, and one of the most frequent comments we get is about the measurement of rooms with sloped ceilings. I sincerely hope you will take this opportunity to make this measurement simple and consistent and help promote consumer protection through the use of the ANSI Standard 2020. We continue to promote ANSI Z765 and are working to try to get more states to consider mandating the ANSI Standard. This change could help in our quest to bring about one language of real estate among professionals. It seems hard to imagine that one change could make such a dramatic difference, but in this case it could be just the change that tips the scales enough to help ANSI become a nationally mandated measurement standard.

After taking into consideration all the conversations and student comments over many years, I believe the best option is to consider the following text.

Per ANSI Z765-2013
Section 3 Calculation of Square Footage

Ceiling Height Requirements

To be included in finished square footage calculations, finished areas must have a ceiling height of at least 7 feet (2.13 meters) except under beams, ducts, and other obstructions where the height may be 6 feet 4 inches (1.93 meters); under stairs where there is no specified height requirement; or where the ceiling is sloped. If a room's ceiling is sloped, at least one-half of the finished square footage in that room must have a vertical ceiling height of at least 7 feet (2.13 meters); no portion of the finished area that has a height of less than 5 feet (1.52 meters) may be included in finished square footage.

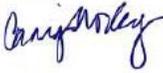
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The measurement stops at the five-foot point on both sloped walls, without the addition of any exterior dimensions.

I believe this method provides for the most consistent measurements in residential dwellings and especially in older homes where sloped ceilings and measurements can be very complex. This is the method we currently teach in our classes and seems to be the consensus among most agents and appraisers. I urge you to consider the simplification of this measurement and the change that best serves the home buying and selling public. I thank you for your time and efforts and look forward the updated ANSI Standard.

Respectfully,

	Hamp Thomas Carolina Appraisers AppraiserELearning.com Whispering Pines, NC 28327 pinehurstappraiser@gmail.com
Reason:	See above.
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 33 – Section 3.6 Ceiling Height Requirements, Figure 5		10/1/2019
Submitter:	Craig Morley, National Association of Appraisers	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	<div style="text-align: center;">  <p><small>National Association of Appraisers Unity • Strength • Professionalism</small></p> </div> <div style="text-align: right; margin-top: 10px;"> <p>7113 San Pedro Ave, Suite 508 San Antonio, TX 78216 (210) 570-4950 info@naappraisers.org www.naappraisers.org</p> </div> <p>October 1, 2019</p> <p>TO: Nay Shah Home Innovation Research Labs 400 Prince George's Blvd. Upper Marlboro, MD 20774 301.430.6233 nshah@HomeInnovation.com</p> <p>RE: Square Footage - Method for Calculating: ANSI Z765</p> <p>Dear Mr. Shah-</p> <p>The National Association of Appraisers (NAA) is a nonprofit, 506c (6) association representing more than 1,500 appraisers across the country. While we support many of the changes proposed to ANSI Z765, we write today to express our concern about the changes proposed in Log #11.</p> <p>The proposal as written creates more confusion than clarity and the treatment of sloped ceilings should remain the same as written in ANSI Z765-2013. The proposal to add the thickness of one hypothetical wall makes little sense and to add the thickness of both walls leads to the question, how thick are the hypothetical walls? It is our belief the intent of the committee was to add value to the Standards by providing clarification and consistency where it can be found. This particular proposal provides neither.</p> <p>We appreciate the efforts made by the committee and support proposed changes to Logs 2, 25, CC01-4 and CC02-4. We thank you for your consideration of our comments and please feel free to contact us with any questions.</p> <p>Sincerely,</p> <div style="text-align: center;">  </div> <p>Craig Morley President, National Association of Appraisers</p> <hr style="border: 1px solid black; margin-top: 20px;"/> <p style="font-size: small; text-align: center;">NAA * 7113 San Pedro Ave, Ste. 508, San Antonio, TX 78216 * (210) 570-4950 * info@naappraisers.org</p>	
Reason:	See above.	
Substantiating Documents:		
Consensus Committee Action:		
Modification of Proposed Change:		
Reason:		

PC 34 – Section 3.6 Ceiling Height Requirements, Figure 5		10/4/2019
Submitter:	Kimberly DeFilippis	
Requested Action:	Request for Clarification/Modification	
Proposed Change:	Please do not make any confusing changes regarding measurement to determine square footage where a sloped ceiling exists. FNMA is instituting appraisal waivers, or	

	inspections by unqualified personnel to measure and photograph homes. Instituting changes that will further confuse individuals who are not properly trained in the first place will result in improper reflects of square footage, therefore further polluting the data pool.
Reason:	
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 35 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Michael Long, self
Requested Action:	Revise as follows
Proposed Change:	<p>Suggestions</p> <ol style="list-style-type: none"> 1. Crop border to make better use of paper space 2. Increase text size for dims 3. Increase text size for explanatory text <p>–Thank you to all for their work –</p>
	<p>SQUARE FOOTAGE – METHOD FOR CALCULATING: ANSI Z11</p> <p>Staff Note: New Figure 5.</p>
Reason:	
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

New Public Comments Post Aug 2019 Meeting from CC Members

PC 36 – Section 3.2 Attached Single-Family Finished Square Footage		10/9/2019
Submitter:	Brian Juedes	
Requested Action:	Revise the calculation of finished square footage to exclude exterior finishes of siding, stucco, brick and stone masonry, etc.	
Proposed Change:	<p>Change the words “exterior finished surface” to “exterior edge of the structure”.</p> <p><i>For detached single-family houses, the finished square footage of each level is the sum of finished areas on that level measured at floor level to the exterior finished surface exterior edge of the structure of the outside walls.</i></p> <p><i>For attached single-family houses, the finished square footage of each level is the sum of finished areas on that level measured at floor level to the exterior finished surface exterior edge of the structure of the outside walls or from the centerlines between houses, where appropriate.</i></p>	
Reason:	<p>To bring the ANSI Z765 finished square footage calculation in alignment with the standard of practice calculation for livable area from Architectural firms working in production housing.</p> <p>Exterior finishes often change for different Elevation Styles offered for the same standard plan. Under ANSI Z765-2013 a change from siding to brick masonry across the front of the home changes the finished square footage for the same standard plan. This creates complexity for the homebuilding industry and confusion for consumers.</p> <p>Under the proposed change, a standard plan would have the same finished square footage regardless of the exterior finishes.</p>	
Substantiating Documents:	SF Calculation Matrix – 2019-06-25	
Consensus Committee Action:		
Modification of Proposed Change:		
Reason:		

PC 37 – Section 3.2 Square Footage – Attached Single-Family Finished Square Footage		10/9/2019
Submitter:	Brian Juedes	
Requested Action:	Revise the calculation of finished square footage to add another calculation method for measuring to the common walls of attached single-family homes.	
Proposed Change:	<p>Add the sentence “When the common wall between houses consists of two separate framed walls (one for each home) the finished area shall be measured to the outer (closest to the centerline) edge of the framed wall for that house”.</p> <p><i>For attached single-family houses, the finished square footage of each level is the sum of finished areas on that level measured at floor level to the exterior finished surface of the outside walls or from the centerlines between houses, where appropriate. When the</i></p>	

	<i>common wall between houses consists of two separate framed walls (one for each home) the finished area shall be measured to the outer (closest to the centerline) edge of the framed wall for that house.</i>
Reason:	<p>To bring the ANSI Z765 finished square footage calculation in alignment with the standard of practice calculation for livable area from Architectural firms working in production housing.</p> <p>Buildings of more than 2 attached units (houses) will have interior and end units, often with the same standard plan. Under ANSI Z765-2013 an interior unit will have more finished square footage than an end unit of the same standard plan because it measures to the centerline between houses on both sides. This creates complexity for the homebuilding industry and confusion for consumers.</p> <p>Under the proposed change, a standard plan would have the same finished square footage regardless of if it was an interior unit or end unit.</p>
Substantiating Documents:	SF Calculation Matrix – 2019-06-25
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

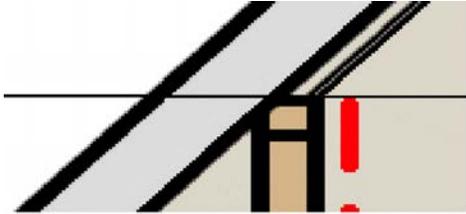
PC 38 – Section 3.4 Openings to the Floor Below		10/9/2019
Submitter:	Brian Juedes	
Requested Action:	Revise the calculation of area at stairs so that the area of both stair treads and landings is included in the finished area of the floor from which the stairs ascend .	
Proposed Change:	<p>Delete the words “proceeding to the floor below”, change the word “descend” to “ascend” and delete the words “not to exceed the area of the opening in the floor”.</p> <p><i>However, the area of both stair treads and landings proceeding to the floor below is included in the finished area of the floor from which the stairs descend ascend, not to exceed the area of the opening in the floor.</i></p>	
Reason:	<p>To bring the ANSI Z765 finished square footage calculation in alignment with standard of practice calculation for livable area from Architectural firms working in production housing.</p> <p>Under ANSI Z765-2013 on a simple 2-story home without a basement, the area of the stair treads and landings is included on the second floor AND the first floor. This varies from current and historical architectural standard of practice. This creates complexity for the homebuilding industry and confusion for consumers.</p> <p>Under the proposed change, the stair calculation could be moved from under “Openings to the Floor Below” to its own “Stairs” heading for added clarity.</p>	

Substantiating Documents:	SF Calculation Matrix – 2019-06-25 (Excel Sheet)
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	

PC 39 – Section 3.7 Finished Areas Connected to the House		9/18/2019
Submitter:	Jean McCarty	
Requested Action:	Could we further address our previous discussion on unheated/cooled utility rooms and large walk in closets or storage rooms in older houses	
Proposed Change:	Could we clarify how these rooms should be treated.	
Reason:	<p>To be included in the calculated square footage, a room must be suitable for year round use. New construction typically puts h/a vents in large walk-in closets and utility rooms in our area. In older homes we find some rooms converted to large closets with no ventilation or h/a and we find utility rooms with no h/a. This leads to individual interpretation as to whether or not they are suitable for year round use. I, for one, do not count these storage rooms or utility rooms if they do not have h/a facilities <u>similar to the rest of the house.</u></p> <p>This also leads to the question as to the size of the room. At what size would a closet or storage room be considered an individual “enclosed space, suitable for year round use and embodying walls, ceilings and floors similar to the rest of the house” rather than an extension of the room it services? A 2 x 5 closet is merely an extension of the room it services, but a 120 SF walk in closet or storage room off habitable space is another matter.</p> <p>We require a 5 X 6 bathroom to have similar h/a facilities as the rest of the house in order to be included in the square footage. However, if that same area had a washer and dryer instead of toilet and bathing facilities, would we? I think we should.</p>	
Substantiating Documents:		
Consensus Committee Action:		
Modification of Proposed Change:		
Reason:		

Negative Ballot Comments as Public Comments from Ballot I

PC 40 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Bryan Reynolds
Requested Action:	Revise as follows
Proposed Change:	Section 3. Ceiling Height - This proposed change will create more confusion than clarity in the valuation profession and for other users. As a national instructor, I witness many students are already confused with this section and this attempt for clarity will fail. I strongly recommend this change not be made to this section.
Reason:	Negative Ballot Comment
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	
Associated Log	Log 11 - Section 3.6 Ceiling Height Requirements, Figure 5

PC 41 – Section 3.6 Ceiling Height Requirements, Figure 5	
Submitter:	Darwin Ernst
Requested Action:	Revise as follows
Proposed Change:	 <p>The drawing I provided in my ballot response is more clear than the one that was provided in the ballot, but I would offer an updated version of this edited figure/image (see attached) to members based on my opinion that the upper floor measurement of all sloped ceiling heights should be restricted to the point of the sloped ceiling at the 5' mark above the floor, regardless of whether there is an exterior wall, pony wall, or any other type of wall beyond the point where the upper floor's ceiling height is 5' above the floor, so there is consistency in the upper floor measurement by all users of the standards.</p> <p>The proposed modification (see below) in item 11 to include the width of an exterior wall on upper floors beyond where the ceiling height reaches a point on the slope of an upper floor ceiling at a point 5' above the floor will be confusing to many potential users, so I am hopeful that we can discuss this motion further.</p>

	<p>The diagram illustrates a cross-section of a house with a gabled roof. A dashed line indicates the finished floor level. The area above this level and below the roof is labeled 'FINISHED LOFT OR ATTIC'. A horizontal line is drawn across the attic, with a vertical dimension line indicating a minimum height of 5'-0". Another vertical dimension line indicates a minimum height of 7'-0" for the sloped portion of the roof. Labels indicate that space where the ceiling is less than 5'-0" is not counted, and that at least one-half of the finished square footage must be 7'-0" where the ceiling slopes. The entry level is shown below grade, and the crawl space below it is also noted as not counted in the area. An exterior porch or deck is shown on the left, also not counted as floor area. A legend is provided at the bottom of the diagram.</p>
Reason:	Negative Ballot Comment
Substantiating Documents:	
Consensus Committee Action:	
Modification of Proposed Change:	
Reason:	
Associated Log	Log 11 - Section 3.6 Ceiling Height Requirements, Figure 5

Non-Responsive

PC 42 – Commentary – Flooring Requirements	
Submitter:	Kelly Jo Kosse
Requested Action:	Add new as follows
Proposed Change:	I agree with change
Reason:	no changes necessary
Substantiating Documents:	
Consensus Committee Action:	Non-Responsive
Modification of Proposed Change:	
Reason:	

PC 43 – Section 4. Statement of Finished Square Footage	
Submitter:	Kelly Jo Kosse
Requested Action:	Revise as follows
Proposed Change:	I agree with change
Reason:	no changes necessary
Substantiating Documents:	
Consensus Committee Action:	Non-Responsive
Modification of Proposed Change:	
Reason:	

PC 44 – Section 4. Statement of Finished Square Footage	
Submitter:	Kelly Jo Kosse
Requested Action:	Revise as follows
Proposed Change:	I agree with change
Reason:	no changes necessary
Substantiating Documents:	
Consensus Committee Action:	Non-Responsive
Modification of Proposed Change:	
Reason:	

Substantiating Documents – PC 38

SF Calculations

Item	ANSI Z765-2013	BSB	Felten Group	Fieldstone	Kevin Crook	KTGY	Strand	PROPOSED MTH Standard	Comment
Measure to exterior finished surface of the outside walls;									Per ANSI, exterior finished surface is to be used.
Brick	Y	Y	N	Y	N	?	Y	N	A "Y" creates different SF for the same plan without brick, with partial brick and with full brick.
Gypsum board at common wall to Garage	Y	N	N	N	N	N	N	N	In a perfect world, one plan has one SF regardless of exterior finish materials.
Wall popouts for recessed windows	Y		N		N			N	This is achievable by always measuring to the outside of the thermal envelope.
Stucco	Y	N	N	N	N	N	N	N	
Vinyl or wood siding	Y	N	N	N	N	N	N	N	
Measure to the centerline between homes for attached single-family	Y	N	N	Y	N	Y	Y	N	A "Y", creates different SF for the same unit on the interior versus the exterior.
The area of both stair treads and landings is included in the finished area of the floor from which the stairs descend	Y	N	N	N	N	N	N	N	Per ANSI, areas beneath stairs are included in the finished square footage regardless of the distance between the stairs and the floor below or the degree of finish.
Finished areas must have a ceiling height of 7 feet , for sloped ceilings no portion of the finished area may have a height less than 5 feet (at least 1/2 of room with a sloped ceiling must have a height of 7 feet)	Y	Y	Y	Y	Y	Y	Y	Y	
Chimney and windows cannot be included in finished square footage unless the protrusions have a floor on the same level and meet ceiling height requirements	Y	?	N	?	N	?	Y	Y	Per ANSI, most protruded fireplaces are excluded.
Condos - measure from interior finish to interior finish	?	?	?	?	?	Y	?	Y	Not covered by ANSI, consult State Law.