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Sent: Friday, September 27, 2019 7:57 AM
To: Braaksma, Krista (DES) <krista.braaksma@des.wa.gov>; Toebbe, Carrie (DES) <Carrie.Toebbe@des.wa.gov>
Subject: FW: SBCC Energy Code TAG

Another for public comment:

Changes that will negatively affect Habitat (in my opinion):

1. Making the minimum credits of 4.5 for small dwelling units will make it more expensive for Habitat to build homes that already far exceed minimum standards. 4 credits seems more reasonable.
2. One area that has always been difficult to meet is the window fenestration requirement to receive full credits in Efficient building envelope. The price difference for a U=0.28 wind vs. a U=0.18 window is substantial! Yet Habitat meets all the other envelope requirements for full credits. I believe builders would use more insulation to get those points if it wasn't for the absurd window requirement.
3. Air leakage control: If you can find me someone who has ever built a house with an HRV and gotten under a 1.0 for air leakage let me know. We use continuous insulation, air seal every wall cavity, and glue the drywall to the studs and can barely maintain under a 3. We found that HRV added penetrations and duct work that make it harder to maintain pressure in the home.
4. High Efficiency equipment: We use ductless split systems, so I actually like the changes on this section. Our house are also Energy star rated so this doesn't affect us much.
5. HVAC Distribution: From a design stand point I respectfully disagree with the minimum requirement of ducts being buried in insulation. When you look at the lifespan of a home the ducts may be fine for the first 5-10 years, but as insulation settles and repairs are made these ducts are at risk of being exposed to the attic air or damaged. Have the ducts in conditioned space is the only way to ensure the stay sealed and provide the most efficient air temperature transfer... and honestly doesn't cost much more if pre planned.
6. Water heating: Never understood why gas water heaters are preferred (other than because utilities would rather sell electricity to California) . Gas units cost more money to buy and install. We install \$600 energy star water heaters that are NOT heat pumps, but are 95% efficient yet receive no points for these. Also, a heat pump water heater is \$1200 (for a cheap one) and is worth 2 points. A heat recovery system on all the drains is \$2000 and worth .5 point. These requirements seem a bit lop sided.

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