

12 July 2019

Washington State Building Code Council
P.O. Box 41449
Olympia, WA 98504

RE: Additional Public Testimony on Interior Lighting Power Allowances: C405.2

Having had a chance to look over the public comment by Denise Fong I am confused about the application of footnotes. The text indicates footnote c is applied to Common Space-by-Space Types but it is not shown in the file. The only place I see it is Lobby where it was in the Legislative Draft. My negative comments today are predicated on the idea that footnote C was being proposed for all space-by-space lighting categories. If it is limited to lobby then I can easily retract my comments. The text also indicates footnote n is applied to Dining but it is not shown in the file.

Denise Fong submitted the 90.1-2019 Building Area Allowance table and I did not. As shown in the building area table submitted by Denise, many of the 90.1-2019 allowances are higher than the current WSEC values. Trying to stick with the mantra of not falling back is why I did not submit this table. However having looked at the weighting used to develop the building area values in 90.1 and thinking about the relationship of these two tables, I'm of the opinion that many of the building area allowances have been significantly more restrictive than space-by-space allowances for some time. This results in projects having to apply the space by space allowances. In general I think having the two paths more balanced will be a good thing and allow faster compliance for some projects.

However for parking garages and especially warehouse I feel the current legislative draft building area allowances should be maintained. The building area allowance is based on an assumed weighting of constituent spaces types which can be highly variable. In building areas where the constituent spaces have very different space allowances the resulting building area allowance is very sensitive to the assumed weightings, and buildings with slighting different space mixes will easily pass the code. Applying space-by-space calculations to these building types is not a significant difficulty and the more building specific allowance has value in my opinion.

Sincerely,

Mike Kennedy