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Sent: Tuesday, March 10, 2020 3:15 PM

To: DES SBCC <sbcc@des.wa.gov>

Subject: Comments on the 2018 IRC

Thank you for the opportunity to comment on WA's proposed adoption of the 2018 IRC. I am writing in support of David Baylon's proposed modifications to the mechanical ventilation requirements of the IRC, which I believe provide better clarity and increase usability while maintaining the intent of the section. Further, I would like to offer the following modifications to the 2018 IRC:

1. Reference the latest version of HVI 920, which is HVI 920-2020. If WA State designates a year for the reference to HVI procedure 920, please ensure that it is the latest version, 920-2020, which offers several improvements over the 2015 version that are meant to bolster the stringency of HVI's ratings program and improve the reliability of ratings for consumers.
2. Ensure that the requirement for exhaust fans to have humidity or occupancy sensors only applies to bathroom fans. I believe that the intention of establishing this requirement is that it only applies to bathroom exhaust fans and not to other exhaust fans, such as kitchen exhaust fans, for which occupancy or humidity sensors may not provide the expected operational control. This oversight could be corrected with the following revision:

M1505.4.1.2 Exhaust fans. Exhaust fans required shall be ducted directly to the outside. Exhaust air outlets shall be designed to limit the pressure difference to the outside to limiting the outlet free area maximum velocity to 500 ft per min and equipped with backdraft dampers or motorized dampers in accordance with Washington State Energy Code. Exhaust fans shall be tested and rated in accordance with the airflow and sound rating procedures of the Home Ventilating Institute (HVI 915, HVI Loudness Testing and Rating Procedure, HVI 916, HVI Air-flow Test Procedure, and HVI 920, HVI Product Performance Certification Procedure). Exhaust fans required in this section may be used to provide local ventilation. **Bathroom Exhaust** fans that are designed for intermittent exhaust airflow rates higher than the continuous exhaust air-flow rates in Table 403.8.3 shall be provided with occupancy sensors or humidity sensors to automatically override the fan to the high speed airflow rate. The exhaust fans shall be tested and the testing results shall be submitted and posted in accordance with Section 403.8.6.7.

Thank you for your consideration,

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