COALITION FOR FAIR ENERGY CODES
AMERICAN WOOD COUNCIL
APA-THE ENGINEERED WOOD ASSOCIATION

August 6, 2014

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512
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Re: Docket No. 2014-BSTD-1
2016 Building Standards Update

The Coalition for Fair Energy Codes, APA – The Engineered Wood Association and the American Wood Council appreciate the opportunity to provide comments to the California Energy Commission regarding the development of the *2016 Building Standards Update.* We offer the following comments and recommendations:

1. Proposed change to Above Grade Wall requirements in TABLE 150.1-A
(Based on the CEC proposed wall U-factor of 0.050)

U 0.050
or
R-19+6
or
R-19+4 header[3]
or
R-15+8, etc.

New footnote
[3] "R-19+4 header" includes minimum R10.7 insulated headers, minimum 7/16 wood structural panel sheathing and 24" oc studs.

Reason
In our experience, building professionals (including engineers, architects, building inspectors, and plan reviewers) have been under the impression that Table 150.1-A ONLY allows the example R-value wall assemblies shown, despite the clarification provided in footnote 2. For example, many believe the current 2013 provisions require walls to be constructed with continuous insulation in order to meet the prescriptive requirements. Therefore, we believe it is necessary to clarify this table for the end user. By adding an "or" between the U-factor and the listed R-values we believe it will be better understood that any wall assembly that meets the listed U-factor is acceptable and the U-factor is not linked to just the continuous insulation assemblies that follow in the table. Furthermore, we have added an additional R-value wall assembly, R19+4 header, that we believe will be readily embraced by the construction community as a cost effective prescriptive solution.

Basis for Wall Assembly U-factor: "R19+4 header"					
Components	**R-Value Framing**	**R-Value Cavity**	**Headers**		
Wall - Outside air film	0.17	0.17	0.17	**R10.7 Insulated headers**	
Building paper	0.06	0.06	0.06	**1" - R4 insulated sheathing**	
One coat stucco	0.08	0.08	0.08	**R18 cavity insulation**	
Sheathing - 7/16 min.	0.62	0.62	0.62	**24" oc studs (22% FF)**	
Insulated sheathing	4.0	4.0	4.0		
5 1/2" Cavity insulation	0	18	0		
5 1/2" Wood header	0	0	10.7		
5 1/2" Wood framing - 24" oc studs	5.45	0	0		
1/2" Drywall	0.45	0.45	0.45		
Inside air film	0.68	0.68	0.68		
Total Wall Component R-Values	**11.51**	**24.06**	**16.76**		
Percentage of area	**18%**	78%	**4%**	**U-Factor**	**R-Value**
U-Factors	**0.0156**	**0.0324**	**0.0024**	**0.0504**	**19.8239**

Thank you for the opportunity to provide comments to the *2016 Building Standards Update.* We look forward to working further with you on this comment and in providing additional input (to follow shortly) regarding the HPA and DCS proposed changes. We apologize in advance for providing comments to the HPA and DCS late, but due to the recent change in deadline change we were unable to develop our comments in time. Please feel free to contact me at tom.kositzky@fairenergycodes.org if CFEC can be of assistance.

Respectfully submitted,

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