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**COMMENTS OF THE CALIFORNIA BUILDING INDUSTRY ASSOCIATION
REGARDING THE PROPOSED 2016 RESIDENTIAL COMPLIANCE MANUAL**

Additional submitted attachment is included below.

**BEFORE THE CALIFORNIA ENERGY COMMISSION
OF THE STATE OF CALIFORNIA**

Attention: Docket No. 15-BSTD-02

Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814

**COMMENTS OF THE
CALIFORNIA BUILDING INDUSTRY ASSOCIATION
REGARDING THE
PROPOSED 2016 RESIDENTIAL COMPLIANCE MANUAL**

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The California Building Industry Association (CBIA) is a statewide trade association representing over 3,000 member-companies involved in residential and light-commercial construction. CBIA-member companies produce over 90% of the new residential dwellings constructed in California on an annual basis.

CBIA appreciates the opportunity to review and provide input on the 2016 Residential Compliance Manual and documents. We have separated the following comments into significant issues, changes for clarity, and minor or non-substantive changes.

Significant Issues

The most significant changes in the 2016 update to Title 24, part 6 are the High Performance Attic (HPA) and High Performance Wall (HPW) requirements. The building industry needs detailed examples and direction on different ways to comply with HPA and HPW. The breadth of the language, examples, diagrams, and other information included in this draft of the Residential Manual does not adequately address the magnitude of this change. The section on Advanced Assembly systems should contain significantly more information related to attic and wall assemblies. At a minimum, a section covering HPAs should include above roof deck diagrams, structural insulated panels (SIPs), high performance conditioned attics (or unvented cathedralized attics), and spray foam applications. In a section covering HPWs, advanced wall framing (AWF), SIPs, and staggered studs should be more thoroughly explained. CBIA is willing to work with the Energy Commission develop this material and encourage manufacturers to supply the diagrams and explanations that are necessary to thoroughly address the industry need for help in the transition to HPAs and HPWs.

Section 2.4 Roles and Responsibilities describes the definition and responsibilities of the “Designer,” “Documentation Author,” and “Builder or General Contractor.” The “Builder,” which in the manual refers to the general contractor, is able to sign the Certificate of Compliance in the “Responsible Person’s Declaration Statement” section of the CF-1R. This allowance should be explicitly stated in section 2.4.1. The language should read as follows: “The designer may be an architect, engineer or other California-licensed professional; however, a licensed design professional may not always be required for low-rise residential buildings. The California Business and Professions Code allows unlicensed designers to prepare design documentation for wood-framed single family dwellings as long as the dwellings are no more than two stories in height (not counting a possible basement). Two-story wood-framed multifamily buildings may also be designed by unlicensed designers as long as the building has four or fewer dwelling units. For homes that do not require a licensed design professional, the builder may sign the Certificate of Compliance (CF-1R) in the “Responsible Building Designer's” signature block.”

Changes for Clarity

On page 3-5 “Conditioned Space” is defined as “either directly or indirectly conditioned...An indirectly conditioned space has less thermal resistance to a directly conditioned space than to the outside. An unconditioned space is enclosed space within a building that is not directly

conditioned, or indirectly conditioned.” This creates the need for clarification in other areas of the manual where directly no longer precedes conditioned, meaning the conditioned space described may be either directly or indirectly conditioned. The first example is in the references to “Ducts in Conditioned Space.” Page 4-1, section 4.1.2.1 says that “the term directly conditioned space was replaced with conditioned space in order to capture ducts located in indirectly conditioned space. The mandatory minimum R-value for ducts located in conditioned spaces is now R-4.2.” This language should also include a reference to how that changes the way ducts in conditioned space are modeled for the performance method of compliance.

An additional area that needs clarification is the need to seal penetrations at the ceiling level. Page 3-103 states that an unvented attic design “eliminates the need to seal or limit penetrations at the ceiling level, such as recessed cans, because the air and thermal boundary is now located at the roof deck.” This language seems to contradict page 3-71 where it says a luminaire recessed in a ceiling must “be sealed with a gasket or caulk between the housing and the ceiling.”

Minor Edits

- 2-24 “For a list of qualified documentation authors, visit CABEC”. “Trade recommended” would be more appropriate language than “qualified.”
- 7-2 The language referring to January 1, 2014 has been struck, but the next sentence references the January 1, 2014 allowance, and that has not been struck.
- 7-3 The language in the minimum area section should only use feet. The conversion to meters has been rounded and is not precise.

CBIA looks forward to working with staff review the referenced sections and to develop and edit material for the Manual.

Respectfully,

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