

DOCKETED

Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	222376
Document Title:	Tenaya Asan Comments Issues with new Duplex over Existing Residential
Description:	N/A
Filer:	System
Organization:	Tenaya Asan
Submitter Role:	Public
Submission Date:	1/26/2018 12:52:27 PM
Docketed Date:	1/26/2018

Comment Received From: Tenaya Asan

Submitted On: 1/26/2018

Docket Number: 17-BSTD-02

Issues with new Duplex over Existing Residential

Although I am unable to locate the exact language, it is my understanding that duplex units are required to receive separate CR-1R reports.

I would like the CEC to address a specific condition where this requirement poses a significant challenge.

The challenge occurs when a new second floor unit is being added over an existing ground floor home. To explain further:

• Older existing homes are built with 2 x 4 framing

• The code for E+A+A allows for "in-line walls" to be the same dimension as the existing walls, but this exception conflicts with the requirement to model the new duplex separately (and thus as new construction).

• Using larger dimensional wall studs to accommodate new envelope insulation requirements, poses a structural problem "supporting larger dimensional studs over 2 x 4 walls"

• Resolving the structural issue may require significant changes to the lower unit, thus not only creating undue burden but also causing conflict with city planning departments who encourage adding residential units.

I would like to suggest specific language be added to the code to address this issue.