DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	236615
Document Title:	Marco Alves Comments - Request to make section 120-1-(f) prescriptive
Description:	N/A
Filer:	System
Organization:	Marco Alves
Submitter Role:	Public
Submission Date:	2/4/2021 7:23:42 AM
Docketed Date:	2/4/2021

Comment Received From: Marco Alves

Submitted On: 2/4/2021
Docket Number: 19-BSTD-03

Request to make section 120-1-(f) prescriptive

Dear Sir/Madam,

I'd like to request a review to make code section 120.1(f) a prescriptive requirement, not a mandatory requirement.

There is ample research showing the benefits of increased ventilation rates to building occupant health and wellbeing, see the latest research on this subject from the Harvard T. H. Chan School of Public health recommending 30 CFM/Person here (https://hbswk.hbs.edu/item/why-covid-19-raises-the-stakes-for-building-health).

The only reason to not over-ventilate (above the code baseline of 15 CFM/Person) is to prevent excessive energy use. However, HVAC designs can be devised that provide increased ventilation to meet the 30% increase to pursue the LEED credit for improved ventilation, or to increase the ventilation rate up to 30 CFM/Person recommended by the Harvard T. H. Chan School of Public health, that use less energy that the code baseline, but are restricted by the mandatory requirement of section 120.1(f).

Thank you, Marco Alves, PE