

**DOCKETED**

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*Comment Received From: Stone Energy Associates  
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**In support of the Multifamily chapters**

*Additional submitted attachment is included below.*

I am an energy consultant who has worked as a builder, the Chief Building Official for Humboldt County, Staff of the Building Standards Office at the CEC, multifamily program developer and administrator, and consultant on many multifamily research projects. I have been involved in the development of the residential building standards since 1988, including several CASE studies, and I have advocated for more targeted multifamily analysis and standards since 2002.

I appreciate the opportunity to comment on the Commission's proposed changes to the California Building Energy Efficiency Standards, which I strongly support. In particular, I would like to express my complete support for the development and adoption of the proposed multifamily chapters in Title 24, Part 6. Separating multifamily requirements from those of single-family and commercial buildings is long overdue – it is critical to achieving more effective energy efficiency within the sector. The reasons for this are many.

- Unlike nonresidential (NR) buildings, these are homes with very different operation schedules, hot water options and uses, and even lighting requirements.
- Unlike single-family (SF) homes, they often use smaller equipment for space conditioning and larger (common) equipment for domestic hot water (DHW).
- They share walls between dwelling units. This means that ventilation and air quality issues are very different from both NR buildings SF homes, and need to be addressed with different research and code requirements.
- Splitting code requirements between SF and NR code sections causes several problems:
  - It unnecessarily complicates the development of potential NR and SF code requirements.
  - It dilutes the analysis of potential MF requirements.
  - It adds to designers' and the enforcement community's confusion about energy code requirements. This is especially true when new construction projects include both 3-story and 4-story apartment buildings that are meant to be essentially the same.
- Many design firms and construction firms specialize in MF development and should not have to go back and forth between to partially relevant code sections and manuals to design one kind of project.
- Multifamily is an increasingly important sector, accounting for a majority of the new residential dwelling units in most of the past (and likely, future) decade. It deserves *focused* attention if we are to achieve the State's climate goals.
- Arguably, MF new construction requirements should already have had more focus than the SF sector. SF homeowners can fairly easily make efficiency improvements, while apartment renters cannot change-out windows, water heaters or HVAC systems, nor add solar panels for their homes. They are effectively stuck with the level of efficiency originally built in.

The Statewide Codes and Standards Enhancement Team has put considerable effort into identifying the types of MF construction likely to take place