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In support of the Multifamily chapters

Additional submitted attachment is included below.

Commissioner Andrew McAlister,
Peter Strait,
Payam Bozorgchami

August 3, 2021

Sirs,

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 adoption of the proposed multifamily chapters (160, 170, and 180) 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 needs.
- Unlike single-family (SF) homes, they often use smaller equipment for individual 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 equipment, research and code requirements.
- The current split of MF 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 have the right and ability to 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 over the next ten or so years, as well as identifying the areas of greatest potential savings. The Team carefully examined the existing research and reached out to a wide array of stakeholders for input. The vast majority of stakeholders strongly supports the intent of a unified MF chapter – separating MF from SF homes and NR buildings.

After visiting numerous building departments under several contracts in the past twenty years, I can testify that there is no application of the code that they find more confusing or illogical than multifamily projects. I observed at least one department essentially throwing up their hands, ignoring the software results, and only enforcing the mandatory measures. If we expect to realize true energy savings from the Standards, then MF requirements must be based on actual MF research and analysis, must be clearly appropriate for MF projects, and must be rationally laid out in chapters specific to this important sector.

I strongly urge the Commission to adopt the proposed Standards with Chapters 160, 170 and 180.

Respectfully yours,



Nehemiah Stone
Stone Energy Associates