

**Efficient Building Advisory Group
Response to SCBA 2/25/08 Letter
Re: Summit Sustainable Building Code (January 10) Draft**

General SCBA Comments and Suggestions:

1. Members of the Efficient Building Advisory Group (EBAG) have done 6 real-life project examples representing various sized projects and feel that this is sufficient testing of the achievability and applicability of the code. The group suggests that individuals within the SCBA do their own testing of the code. However, examples of Multi-Family and Addition/Remodel projects will be made available for using during any future educational forums regarding the code.
2. The EBAG has committed to having new eyes look at the code from some who were previously uninvolved in the process to provide a fresh perspective on the complexity of the code. One specific, potential review source that will be sought is the Governor's Energy Office. However, the group felt that compared to other existing codes, the Summit Sustainable Building Code does not seem overly complex, and this is generally an individual matter of perspective.
3. The language for remodels has been altered to state more clearly that the existing structure does not need to comply with this section, and that points for building size only start to accumulate once the total structure reaches 3000 square feet for single family and 1200 square feet for multi-family.
4. This section did need more clarity; the new documents address this more clearly; the EBAG feels that multi-family buildings are equally challenged by the code. See comment #1 regarding examples.
5. The statutory agricultural exemption still applies to outbuildings and the ranching community.
6. A common letter describing the code and respectfully asking that Design Review Boards and HOAs consider these regulations with their design requirements will be drafted and signed onto by all jurisdictions and mailed to such entities; the Building Officials agree to offer proactive outreach to HOAs.
7. SCBA will have one designated representative on the Technical Advisory Panel; it will be up to SCBA to designate that person; a Memorandum of Understanding will be drafted to describe the Technical Advisory Panel; the EBAG feels that it is too early for a paid position on the Technical Advisory Panel, however outside assistance will be sought we needed for specific research (a potential source is the Governor's Energy Office).
8. This has been addressed in current documents
9. This has been done as appropriate and possible; homes of less than 3000 square feet now show a credit on the checklist and are described as such in the other documents.

Specific SCBA Comments & Suggestions:

2.0 Mandatory Measures

2.1 Simplicity of compliance necessitates that it is NOT the full component of the structure; but, the calculations done to determine point values for insulation did consider cumulative results of full structure; insulation compliance shall follow the 06 IECC and

questions should reference that document; a table has been added in the resource guide to clarify the language and a better description of the “Interpretation Process” that allows a builder or designer to appeal point values has been included in front of the Resource Guide.

2.2 The stickers on windows will indicate U-value and do refer to whole assembly and this is how u-value compliance will be determined.

2.3 This section has been amended to allow for two non-rated exterior doors (the 06 IECC only allows for one opaque door not meeting U-value).

2.6 This was intended; more language has been added to detail this request.

3.0 Secondary Measures

3.1 The Efficient Building Advisory Group is satisfied with the baseline home sizes as reasonable values to start with; the checklist has been revised to reflect multi-family and remodels more clearly; it will be up to individuals to look to their own towns for schedules of adoption and timetables for implementation; it will be up to each jurisdiction and building official to determine leniency for design processes that have already begun; refer to comment 3.20 (under Sustainable Building Menu) for information on other building programs and their applicability

3.2 Methods for calculating have been clearly defined in current draft; homes designed to be dismantled can appeal for more points through the “Interpretation Process” now described in Resource Guide; points for Standing Dead have been added under the renewable definition; OVE points have been added back into the code under the Sustainable Building Menu.

3.3 Language has been clarified to exempt powder rooms and toilet compartments; language has been added to include “transoms to adjoining rooms” to help alleviate some concerns about energy loss through windows; this is not a mandatory measure and the point values are relatively small if one chooses not to use daylighting in these rooms.

3.4 For simplicity sake, this value is for one fan per room

3.5 Window insulation has been removed from this section and added to the Menu section.

3.6 Language has been clarified to define recycling centers and associated point values; this is not a mandatory measure and the point values are relatively small if once chooses not to install recycling centers.

3.7 Language has been clarified to list appliances; only those listed are Energy Star certified; people may apply for Innovative Points for super-efficient appliances through “Interpretation Process.”

3.8 Energy Efficient Controls are in Menu (not Secondary Measures) in current draft; it is per thermostat.

4.0 Intensive Energy Use Amenities

4.1 In the interest of simplicity, this item will remain in as described; only exterior fireplaces are included here; the EBAG feels that the point scale is not so large to be too onerous.

4.2 In the interest of simplicity, this item will remain in as described; the EBAG feels that the point scale is not so large to be too onerous; exemptions or point variations can be appealed through the Interpretation Process.

4.3 The EBAG feels that this is an important inclusion in the code and that heating outdoor surfaces should be discouraged and that the point scale is fair for this draft.

4.4 Regarding air conditioning, the point scale has been changed to scale for small rooms in the current draft (1 point for 0-200 square feet); regarding Climate Change, most language inferring that this is an issue has been reworded.

4.5 The EBAG feels that the issue of heat tape can not be addressed in this code at this time, but may be something that is addressed in future versions; a section has been added to the Resource Guide for information on this use of energy; if a home has no heat tape, a builder or designer is welcome to use the Interpretation Process to potentially achieve positive points.

Sustainable Building Menu – All numbers match in the current drafts of the Checklist and the Resource Guide, however the numbers below correspond to the list from SCBA and use the number 3...

3.1 Clarifying language has been added to state that a corner refers to a change in the wall plane.

3.2 A positive point has been added for projects that stay within the disturbance envelope; clarifying language has been added to the current draft.

3.3 Even though there are no building materials reuse centers in the County at this time, deconstruction has been included in the code to encourage the development of infrastructure and cottage industries, and list of Reuse Centers is attached in Appendix 4; points have been altered to reflect cubic yards of materials donated and this is a self-certified issue and generalities will be acceptable at this time; clarifying language has been added to distinguish between reuse/donation of materials and recycling of materials and how they are measured.

3.4 Percentage of recycling materials refers to the percentage of total waste disposed; a real-life example has been included in the Resource Guide; recycling has been included to encourage the development of infrastructure and the Summit County Government has been working with waste haulers to develop solutions, including smaller containers and split containers that may alleviate some of the disturbance envelope issues.

3.5 Points for unconditioned garages have been removed entirely; to get the points for a roof designed for future solar collectors, a short report on potential solar gain will be required and is described in the Resource Guide; a device that calculates solar potential makes this endeavor relatively easy and is described in the Resource Guide.

3.6 Plans should show these building envelope issues and can be seen at framing inspection; formatting issues have been addressed in current drafts; energy heels have been changed to 12" and wall sheathing has been changed to 5 points.

3.7 Active Solar is now pro-rated as other renewable systems are; other systems (domestic water recirculation pumps, dual-boilers, etc) can be addressed through the Interpretation Process.

3.8 Lighting does include LED and other technology in current draft; the EBAG feels that fluorescent bulbs are an appropriate green technology at this time and are getting better in performance and lower in toxicity; the EBAG feels that a benefit of smaller home having an easier time in counting bulbs than large homes is acceptable; other technologies can be addressed through the Interpretation Process.

3.9 Point scale has been changed to reflect 1 point per 10% of blown in and sprayed insulation; the EBAG does not feel that points should be given for having no pipes in unconditioned space; description of recycled content insulation has been changed to include 30% recycled content (instead of 70%); formaldehyde free insulation has been removed from the current draft.

High Country Conservation Center

3.10 Description has been changed to read R-10 minimum or equivalent to reflect this suggestion; yes, it is 8 points total with recycled content.

3.11 OVE has been added back to the code and is in the current draft.

3.13 FSC Certified windows and doors have been added to the current draft at 1 point per 25% of total windows/doors respectively.

3.14 Metal roofs have been taken out and have been replaced with language that provides points for any roof with 50 year life rating or higher and positive points for recycled content materials.

3.15 New technologies and products can be approved in the code through the Interpretation Process

3.18 Water saving toilets have been added to reflect 1 point per 25% of total and such technology is described in the Resource Guide.

3.19 The current draft has been changed to require radon report and reflect the distinction between active and passive systems. Regarding the other suggestions, the point values included reflect the rating process, which ultimately scored IAQ issues as a matter of personal choice.

3.20 The “other building certification programs” have been moved to the Innovative Points section and will be addressed on a case-by-case basis until a comprehensive study has been done to ensure that other building certification programs meet the desired intent of the Summit Sustainable Building Code; as mentioned in the SCBA list and letter, scalability and house size is an issue that was deemed to be important for this community and it is unclear that other building certification programs adequately address this issue.