

**From:** [DGS Website@DGS](mailto:DGS_Website@DGS)  
**To:** [CBSC@DGS](mailto:CBSC@DGS)  
**Subject:** PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Mark Redmond  
**Date:** Tuesday, May 12, 2020 2:16:55 PM

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Commenter Contact Information

Name: Mark Redmond  
Date: 5/12/2020 12:00:00 AM  
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Proposed Building Standard

Title 24 Part #: Part 5  
Section #: Table 4A  
Proposing State Agency: OSHPD  
This comment is intended for review during: 45-Day Comment Period

Your recommendation based on the criteria of Health and Safety Code Section 18930(a):  
Disapprove

In support of your recommendation above, provide the rationale based on the criteria of Health and Safety Code Section 18930(a). If you recommend anything other than approve, cite the criteria in your comment. If you oppose a proposed building standard, offer a solution or alternative for the state agency to consider.

Table 4A Column E allows 2 ACH for 11 spaces. Keep them.

The reductions

- (1) SAVE ENERGY. Energy should not be ignored in this decision.
- (2) ARE PROVED BY RESEARCH. CEC PIR-16-004 showed air quality at 2 ACH is equivalent to 4-12 ACH. So, use of 2 ACH is data validated.
- (3) ARE FREQUENTLY USED. 2 ACH spaces are common, unlike critical spaces
- (4) ARE NOT IN CRITICAL SPACES. JHCO item EC 02.05.01 #15 verifies HVAC in spaces where HVAC is critical. No 2 ACH space are on the JHCO checklist, or affect Medicare funding.

18930 (a) (3) This change does not serve public interest. It doesn't improve health and safety. It hurts resource efficiency and building system performance. It increases energy use, which is against CA's energy and public health goals.

18903 (a) (7) (A) To not use a national standard, state the inadequacy. ASHRAE170 is inadequate since its developers never studied energy or energy cost-benefits.

9 Point Criteria Info:  
18930(a) 3