

From: [DGS Website@DGS](mailto:DGS_Website@DGS)
To: CBSC@DGS; mikec@cmservices.com
Subject: PUBLIC COMMENT on PROPOSED BUILDING STANDARDS - Michael Cudahy
Date: Tuesday, May 30, 2023 8:39:17 AM

Commenter Contact Information

Name: Michael Cudahy
Date: 5/30/2023 12:00:00 AM
Representing: PPFA
Mailing Address
Number and Street: 800 Roosevelt Road Bld C Ste 312
City: GHlen Ellyn
State: IL
Zip Code: 60137
Telephone #: 6303637933
Email: mikec@cmservices.com

Proposed Building Standard

Title 24 Part #: Part 11
Section #: Chapter 5, Section 5.409
Proposing State Agency: BSC
This comment is intended for review during: 15-Day Comment Period

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

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.

Section 5.409.2, and possibly others, include the "Whole Building Life Cycle Assessment" methodology, yet they specifically exclude the critical "operational energy" component of an LCA - the long use phase of the building, where a majority of energy and environmental impacts may occur.

When building products and systems are selected for building use with the intention of lowering impacts, the energy consumed and emissions produced during the actual building occupation is a critical consideration and should not be excluded. For example, the impacts of manufacturing hot water piping vs. the impact of delivering hot water over the life of the building are two orders of magnitude apart, with the significant energy and water consumption found in the long use phase.

We encourage California to consider, and not exclude, use phase impacts when making LCA product and building decisions. To not do so could result in buildings with lower impacts up front, but far worse performance.

9 Point Criteria Info:
18930(a) 1