

From: DoNotReply@delaware.gov
To: [HearingComments, DNREC \(MailBox Resources\); baharehzvb@gmail.com](#)
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Comments on Docket #2019-R-CCE-0020

Name: Bahareh van Boekhold
Phone: 3025623112
Email Address: baharehzvb@gmail.com
Organization: Delaware Community of Green Building United

Comments:

The Delaware Community of Green Building United is writing to provide additional suggestions and resources to address the concerns expressed in the public hearing and in written comments specific to the Air Changes per Hour (3 ACH) requirements. Today, homes in neighboring states of VT, CT, MA, NY, WV, RI*, and NJ** are built to the 3 ACH airtightness standard regardless of type or size. 3ACH is achievable and beneficial to homeowners, it, however, requires more attention in air sealing of new homes. Delaware builders, similar to their counterparts in other states, can build tighter homes with the right education and training. We understand the concerns of the Delaware Homebuilders Association and propose the following two-pronged approach to help and facilitate this transition: • Targeted training for contractors and code officials Delaware contractors and code officials should be supported with engagement and training on air sealing. Rather than rolling back the stringent 3 ACH requirement, Delaware has the opportunity to make its contractors and code officials among the most skilled in their fields. A Delaware code clinic can provide needed training, education, and potentially a limited trial of free on-site air tightness testing to ensure home builders can achieve the requirement. • Grace period In lieu of lessening the air changes per hour requirements for homes in Delaware, we also propose the idea of a grace period to allow design professionals, contractors, and code officials to receive education and training. We are looking into examples of other states that have pursued similar delayed compliance strategies. Regards, Bahareh van Boekhold, MEEP, LEED AP, BPI Co-Chair -DE Community of Green Building United Chair of City of Newark Sustainability Planning Steering Committee Delaware Resident and a proud UD Blue Hen! *RI requires 3 ACH in its Building Stretch Code. ** NJ requires 3 ACH but, a blower door test is optional alternative testing can verify code compliance.