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Comments on Docket #2019-R-CCE-0020

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Organization: No

Comments:

I wanted to comment specifically to the proposed adoption of the 2018 IECC with regards to R402.4.1.2. It is my understanding that there may be an amendment proposed that effectively weakens our code that is currently in place. There is documented building science regarding the physics of air movement and amount of moist air exchange through a building envelope. As we decrease the air exchange of a building, we decrease the risk of mold in the walls, decrease the discomfort to its occupants and decrease the use of energy to heat and cool our buildings. Conversely, if we weaken the existing code by increasing the ACH limit we would increase these issues. Based on my understanding of the comments made leading up to this hearing, the reason for wanting to weaken our existing code was that someone advised that it's too difficult to achieve 3 ACH 50. I consult on many Certified Passive House projects where the requirement is point 6 ACH and while that extreme air tightness can be difficult, reaching 3 ACH 50 is not. I will agree that it does take training of the work force to appreciate the need for air sealing during normal construction, but it is not that difficult to achieve.