

**In The Matter Of:**

*Department of Natural Resources & Environmental Control  
Regulatory Amendments to State Energy Conservation Code*

---

*Public Hearing  
December 3, 2019*

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DEPARTMENT OF NATURAL RESOURCES & ENVIRONMENTAL CONTROL  
OF THE STATE OF DELAWARE

RE: Public Hearing Regarding )  
Proposed Regulatory Amendments to )  
the State Energy Conservation )  
Code Regulations )

. . . . .

DNREC Richardson & Robbins Building  
89 Kings Highway  
Dover, Delaware 19901

Tuesday, December 3, 2019  
6:00 p.m.

. . . . .

BEFORE: Theresa Newman, Hearing Officer

ALSO PRESENT: Rob Underwood, DNREC  
Jessica Quinn, DNREC

-- Transcript of Proceedings --

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1 MS. NEWMAN: We are going to start  
2 tonight's proceedings. Please allow the  
3 record to reflect the time is now 6 p.m. on  
4 Tuesday, December 3, 2019.

5 Thank you all for taking the time  
6 out to be here with us today.

7 We are here this evening to provide  
8 a formal platform for the State of Delaware  
9 Department of Natural Resources and  
10 Environmental Control to receive public  
11 comment on the Proposed Regulatory Amendments  
12 to 7 Delaware Admin Code 2101, Regulations  
13 for State Energy Conservation Code.

14 My name is Theresa Newman, and  
15 Secretary Garvin has appointed me to serve as  
16 the hearing officer for tonight's formal  
17 proceeding.

18 There is a sign-in sheet in the  
19 back of the room. For those who have not  
20 signed in, I ask that you do so, as it is  
21 mandatory to have an accurate log of all  
22 attendees.

23 Also, please indicate on the  
24 sign-in sheet whether you wish to submit



1 comment at tonight's hearing.

2 Those persons offering comment will  
3 be given an opportunity to do so following  
4 the brief presentation given by the  
5 department.

6 Those individuals will be  
7 recognized by the hearing officer in no  
8 particular order from the sign-in sheet.

9 With regards to the public comments  
10 wishing to be offered tonight, there are, as  
11 in all cases with DNREC public hearings,  
12 formal protocols which must be adhered to  
13 this evening.

14 Please be advised of the following  
15 rules which are in place for tonight's formal  
16 proceeding:

17 Please mute or turn off all cell  
18 phones for the duration of the proceedings to  
19 avoid any disruption.

20 All comment must be limited solely  
21 to the subject matter of tonight's hearing,  
22 which is, again, the Proposed Amendments to 7  
23 Delaware Admin Code 2101, Regulations for  
24 State Energy Conservation Code.



1           Each person will be granted a total  
2 of three minutes to offer comment. There  
3 will be a visual timer in place to help  
4 everyone be aware of the remaining time while  
5 commenting.

6           If you have brought written  
7 comments with you tonight, I would ask that  
8 you present that to me when you have been  
9 recognized so the same can be entered into  
10 the record.

11           If you have brought another  
12 person's comment with you and you wish to  
13 speak to their comment, you may do so.  
14 However, that will be a part of the  
15 three-minute time allotment you have with  
16 your own comments, as well.

17           Your three-minute time allotment  
18 may then be used to offer a brief summary of  
19 the comments verbally for the benefit of  
20 those in attendance today.

21           There will be no yielding of time  
22 from one commenter to another. I ask that  
23 you respect the time of each person and be  
24 respectful and considerate of all comments



1           offered, even though some of those comments  
2           may differ in your opinion.

3                         Also, there will be no Q and A  
4           session permitted during the course of  
5           tonight's formal proceeding.

6                         Myself and DNREC staff are present  
7           to facilitate the receipt of public comment  
8           and to participate in the proceedings.

9                         Lastly, pursuant to the subject  
10          matter of this hearing, all comments  
11          pertinent to the aforementioned amendments  
12          will be incorporated into the formal hearing  
13          record being generated in this matter.

14                        There is only one authentic record  
15          of formal proceeding tonight, and it is the  
16          official court reporter's verbatim  
17          transcript.

18                        The verbatim transcript is being  
19          created to memorialize tonight's formal  
20          hearing by the court reporter.

21                        She can only accurately hear one  
22          person at a time. In order to ensure  
23          accuracy of this transcript and to be mindful  
24          of the above protocols in this formal



1 proceeding, please do not speak while another  
2 person is speaking, and do not call out from  
3 the audience for any reason.

4 It is important to note that no  
5 decision has been made by the Department, nor  
6 will any decision be made tonight.

7 A record consisting of the  
8 transcript, verbal comments given tonight,  
9 all written comments submitted prior to the  
10 hearing, all exhibits, and my report will be  
11 viewed by the Secretary.

12 The Secretary will ultimately issue  
13 an order, following that review process,  
14 containing his decision of the proposed  
15 amendments and the reasons therefore.

16 The hearing record being generated  
17 in this matter will close 15 days from  
18 tonight's hearing on Wednesday, December 18,  
19 2019.

20 All comment, whether offered  
21 verbally tonight or submitted prior to  
22 December 18th in writing, will bear the exact  
23 same weight and will be all considered  
24 equally by the Secretary prior to making a





1 final decision in this matter.

2 With that being said, I am going to  
3 hand it over to Jessica Quinn, who is going  
4 to do the Division's presentation.

5 MS. QUINN: Good evening. My name  
6 is Jessica Quinn. I'm a planner with the  
7 Division of Climate, Coastal and Energy.

8 The purpose of the Department's  
9 proposed regulatory action is to update the  
10 State Energy Conservation Code, as the  
11 Department is directed by the Delaware Energy  
12 Conservation Code Act in Title 16, Section  
13 7602.

14 During this presentation, I will  
15 review the Department's proposed regulations,  
16 promulgation schedule, and enter the  
17 Department's exhibits into the record.

18 After my presentation, the public  
19 will have an opportunity to provide comment.

20 The proposed regulation has been  
21 made available for public review in the  
22 Division of Climate, Coastal and Energy  
23 Office in Dover and in the November 1, 2019  
24 Delaware Register of Regulations.



1           A legal notice regarding the  
2           availability and publication of the proposed  
3           regulation and the schedule of today's public  
4           hearing was published in the News Journal and  
5           the Delaware State News on Sunday,  
6           November 10, 2019.

7           Following tonight's hearing, the  
8           public record will remain open for comments  
9           until close of business on Wednesday,  
10          December 18.

11          The Department anticipates  
12          promulgating the final regulations sometime  
13          in March, the spring of 2020.

14          The new Energy Conservation Code  
15          will take effect six months after the final  
16          promulgation.

17          The Energy Conservation Codes  
18          establish the minimum design and construction  
19          requirements for energy efficiency in the  
20          building sector, contributing to protecting  
21          the health, safety, and comfort of building  
22          occupants and owners.

23          Delaware currently requires ASHRAE  
24          Standard 90.1-2010 and a version of the 2012



1 IECC that has Delaware-specific amendments.

2 Delaware's Energy Conservation Code  
3 Act directs the Department to evaluate for  
4 adoption the most recent or highest-available  
5 version of the IECC and ASHRAE standard on a  
6 triennial basis.

7 Delaware last adopted updated  
8 Energy Conservation Codes in 2014 and began  
9 review of the available versions of ASHRAE  
10 and IECC in January of 2017.

11 Updating the Statewide Energy Code  
12 has been under consideration since January of  
13 2017. The Department is proposing to amend  
14 Regulation 2101 to adopt by reference the  
15 2018 IECC and ASHRAE 90.1-2016 in their  
16 entirety.

17 To reach this proposal, the  
18 Department staff evaluated the available  
19 versions of the IECC and ASHRAE standard,  
20 evaluated the energy conservation codes that  
21 are in use in other states and municipalities  
22 in the Mid-Atlantic and northeast region, and  
23 collected information and input from the  
24 Delaware Energy Code Coalition, numerous



1 stakeholders, and technical experts.

2 The Delaware Energy Code Coalition  
3 was convened and met 11 times between  
4 March 2017 and January 2019 so the Department  
5 could collect input on the available versions  
6 of the IECC and ASHRAE standard.

7 The coalition includes  
8 representatives from the Delaware  
9 Homebuilders Association, commercial  
10 builders, local enforcement officials,  
11 Delaware ASHRAE chapter staff, technical  
12 experts from the Northeast Energy Efficiency  
13 Partnerships, or NEEP, and the Building Codes  
14 Assistance Project, or BCAP, and other  
15 stakeholders.

16 The Department found that the  
17 impacts associated with updating to the 2018  
18 IECC and ASHRAE Standard 90.1-2016 pass  
19 cost-effectiveness tests and accrue energy  
20 cost benefits to building owners and  
21 occupants over the life of the buildings  
22 constructed under these energy standards.

23 The higher energy codes save  
24 Delawareans money through reduced energy



1 costs, improve building safety and comfort,  
2 and reduce environmental impact in the  
3 building sector.

4 Adopting the current version of the  
5 IECC and ASHRAE Energy Conservation Codes  
6 will increase building sector energy  
7 efficiency, bring energy cost savings to  
8 building owners and occupants, increase  
9 occupant comfort, and reduce emissions in  
10 Delaware.

11 As such, the Department is  
12 proposing to adopt the 2018 IECC and ASHRAE  
13 90.1-2016 in their entirety.

14 The Department is presenting 17  
15 exhibits provided. Here is the list of the  
16 exhibits. I have them in a binder to be  
17 presented to our hearing officer.

18 Exhibit 1 is the Start Action  
19 Notice 2019-04, Regulations for the State  
20 Energy Conservation Code, signed on April 4,  
21 2019.

22 Exhibit 2 is the Delaware Energy  
23 Code Coalition meeting agendas from March 22,  
24 2017 through January 23, 2019.



1                   Exhibit 3: Comments received by  
2                   the Department between January 2017 and  
3                   February 2019 from stakeholders sharing their  
4                   opinions on updating the Statewide Energy  
5                   Conservation Code.

6                   Exhibit 4: A memorandum from Matt  
7                   Socks of Optimal Energy, the Department's  
8                   technical consultant, to Rob Underwood of  
9                   DNREC dated March 20, 2019, analyzing the  
10                  cost and energy impacts associated with  
11                  adopting the 2018 IECC without weakening the  
12                  air-tightness requirements in the Code.

13                  Exhibit 5 is a copy of the  
14                  preliminary energy costs and savings  
15                  estimates of the 2018 IECC residential  
16                  requirements published by the Pacific  
17                  Northwest National Labs in April of 2019.

18                  Exhibit 6: A memorandum from  
19                  Matthew Tyler of the U.S. Department of  
20                  Energy to Jessica Quinn dated October 2, 2019  
21                  regarding the preliminary results of the U.S.  
22                  Department of Energy's cost-effectiveness  
23                  study for ASHRAE Standard 90.1-2016 for the  
24                  State of Delaware.



1                   Exhibit 7 is a memorandum from Z.  
2                   Todd Taylor of the U.S. Department of Energy  
3                   Pacific Northwest National Labs to Jessica  
4                   Quinn of DNREC dated October 3, 2019.

5                   Exhibit 8 is a copy of the State  
6                   Energy Code Tracking Table published by the  
7                   Northeast Energy Efficiency Partnerships  
8                   showing the status of Energy Code adoption in  
9                   the Mid-Atlantic and Northeast states,  
10                  updated in October of 2019.

11                  Exhibit 9 is a notice of this  
12                  public hearing as it appeared in the State of  
13                  Delaware Public Meetings Calendar, posted  
14                  November 1, 2019.

15                  Exhibit 10: A copy of the legal  
16                  notice regarding the proposed amendments to  
17                  Title 7 of the Delaware Admin Code, Section  
18                  2101, as posted in the main entryways of the  
19                  DNREC's Richardson and Robbins Building.

20                  And Exhibit 11 is a copy of the  
21                  legal notice regarding the proposed  
22                  amendments to Title 7, Delaware Admin Code,  
23                  Section 2101, as posted on DNREC's public  
24                  notices website starting on November 10,



1           2019.

2                         Exhibit 12 is a copy of a  
3           November 6, 2019 e-mail from Jessica Quinn  
4           sent blind copy to individuals on the State  
5           Energy Conservation Code regulations  
6           Interested Parties list and the Delaware  
7           Energy Code Coalition members, which included  
8           information from the legal notice on the  
9           public hearing and procedures for submitting  
10          public comments on this matter.

11                        Exhibit 13: Affidavit of  
12          Publication from the Delaware State News  
13          dated November 10, 2019 for the legal notice  
14          advertising tonight's hearing.

15                        And Exhibit 14, an Affidavit of  
16          Publication from the News Journal dated  
17          November 10, 2019 for the legal notice  
18          advertising tonight's hearing.

19                        Exhibit 15 is a copy of the  
20          Register Notice, proposed strike-through  
21          language, and the Regulatory Flexibility  
22          Analysis and Impact Statement Form as it  
23          appeared in the November 1st Delaware  
24          Register of Regulations.





1                   Exhibit 16: Comments on the  
2                   proposed regulation as published in the  
3                   November 1, 2019 Delaware Register of  
4                   Regulations, received through December 3,  
5                   2019.

6                   And Exhibit 17, the Department  
7                   presentation for the December 3 public  
8                   hearing.

9                   This completes the Department's  
10                  presentation on the proposed amendments to  
11                  the Delaware Regulations governing the State  
12                  Energy Conservation Code.

13                  And we will take the public  
14                  comment.

15                  MS. NEWMAN: Does this conclude the  
16                  Department's remarks?

17                  MS. QUINN: It does.

18                  MS. NEWMAN: Okay. Do you have the  
19                  binder?

20                  MS. QUINN: Yes. (Handing)

21                  MS. NEWMAN: Thank you.

22                  Let the record reflect that  
23                  Exhibits 1 through 17 as identified by the  
24                  Department are hereby entered into the formal



1 hearing record.

2 As the Department has no further  
3 remarks, I will now open it up to public  
4 comment by calling on those individuals who  
5 have signed in and marked that they would  
6 like to provide comment.

7 Please keep in mind there is a  
8 three-minute timer for each person, and we  
9 have provided a visual, as well.

10 And if you have any written  
11 comment, please hand those to me at the time  
12 that you are called.

13 I'm going to start with Thomas  
14 Marston.

15 MR. MARSTON: And just for  
16 clarification, will that be my timer?

17 MS. NEWMAN: Yes. You will see  
18 three bars coming, and then you'll know your  
19 time is up by the time it goes down to the  
20 red bar at the end.

21 MR. MARSTON: Okay. I will pay  
22 attention.

23 Good evening. My name is Thomas  
24 Marston. I'm representing myself. I live at



1 986 Nabbs Creek Road, Glen Burnie, Maryland,  
2 21060.

3 I was a resident of Delaware and an  
4 energy expert, energy rater in Delaware, for  
5 20 years.

6 And so I speak tonight on the code  
7 that you plan to adopt.

8 I sat on the Code Development  
9 Committee in the process of developing the  
10 2018 Code, so I consider myself an expert for  
11 this particular topic.

12 And I stand tonight to present the  
13 code amendment to the 21 Code that has been  
14 accepted and will be part of the 21 Code,  
15 RE96-19.

16 The purpose of RE96-19 is to  
17 provide modification to the blower door  
18 requirement without minimizing or diminishing  
19 the value or the intensity of the code.

20 Air leakage should be considered a  
21 prescriptive path item to allow for the  
22 adjustment.

23 In this amendment, the blower door  
24 is allowed to be at five air changes.



1           Although engineered consideration requires it  
2           to be calculated based upon three air  
3           changes, that is the stated value in the 2018  
4           code.

5                     The difference in building leakage  
6           is made up through more intensive insulation,  
7           more efficient furnace and air conditioning  
8           equipment, or anything else that's already in  
9           the prescriptive path of the '18 code.

10                    So this is a code-neutral amendment  
11           and should be considered.

12                    Let's consider Exhibit Number 8,  
13           other states in the region.

14                    Pennsylvania has adopted five. It  
15           does not consider three in their code.

16                    Maryland has adopted the '18 Code  
17           with roughly this amendment, so three is  
18           design; five is a mandatory.

19                    Jersey and Virginia do not mandate  
20           a blower door and assume five air changes as  
21           maximum.

22                    So other states are not holding the  
23           '18 Code as rigidly as Delaware may propose.  
24           Therefore, I strongly recommend RE 96-19 as



1 I'm submitting tonight.

2 Thank you very much.

3 MS. NEWMAN: Thank you.

4 MR. MARSTON: (Handing document)

5 MS. NEWMAN: Thank you. As  
6 Mr. Marston has handed me a document, I will  
7 mark this as Marston Exhibit 1.

8 Laura Baker?

9 MS. BAKER: Good evening. I'm  
10 Laura Baker from Responsible Energy Codes  
11 Alliance.

12 I am here to express our support  
13 for Delaware's adoption of the unamended 2018  
14 IECC and ASHRAE Standard 90.1-2016.

15 Updating Delaware's Energy Codes  
16 will provide economic and financial benefits  
17 to Delaware citizens, as well as technically  
18 sound and critical updates to Delaware's  
19 building standards.

20 The updated code will help Delaware  
21 meet its climate and efficiency goals and  
22 bring energy cost savings for building owners  
23 and occupants.

24 ASHRAE Standard 90.1-2016 will



1 bring Delaware an additional 15.8 percent  
2 savings, energy cost savings, as compared to  
3 the current code.

4 The improvement to ASHRAE 90.1  
5 include improved (inaudible) efficiency and  
6 more efficient heating, cooling, water  
7 heating, and line equipment.

8 Updating from the 2012 to the 2018  
9 IECC will bring Delaware 3 percent energy  
10 cost savings. The improvement to the IECC  
11 include more efficient stration, include  
12 envelope leakage testing, and more efficient  
13 lighting.

14 Delaware will also benefit from  
15 increased flexibility under the new ERI  
16 compliance panel.

17 These improvements benefit Delaware  
18 citizens for the lifetime each of these  
19 buildings are built under the new code; thus  
20 we support the Division in adopting the  
21 unamended 2018 IECC and ASHRAE standards  
22 90.1-2016.

23 I would also like to briefly  
24 address Mr. Marston's comments. We believe



1 that getting to three air changes per hour is  
2 very doable and is very -- there are a lot of  
3 states in the area that are actually  
4 enforcing three air changes per hour, as  
5 Mr. Marston knows.

6 But we do support, if the Division  
7 wants to move to a kind of compromise, we  
8 would support RA96, although we do think  
9 three air changes per hour is doable and the  
10 preferred path.

11 And -- oh, I forgot to give my  
12 address. My address is 1850 N Street  
13 Northwest, Suite 600, Washington, D.C.,  
14 20036. Thanks. (Handing document.)

15 This is just a copy of the comments  
16 we e-mailed.

17 MS. NEWMAN: Sure.

18 MS. BAKER: Thanks.

19 MS. NEWMAN: Please allow the  
20 record to reflect the document just handed to  
21 me by Mrs. Baker as Baker Exhibit 1.

22 Next we have BJ --

23 MR. CAREY: Carey.

24 MS. NEWMAN: Carey. Okay. Thank



1           you.

2                         MR. CAREY: Yes. My name is BJ  
3           Carey. I live at 67 Clark Court in Dover,  
4           Delaware, 19901.

5                         I did have the pleasure of serving  
6           on the Building and Energy Code Coalition.

7                         I attended a good portion of the 11  
8           meetings in person and attended the rest by  
9           phone, I believe.

10                        My main purpose tonight is just to  
11           comment on the -- kind of the process.

12                        Throughout that process, the  
13           coalition worked together, and it was a very  
14           eclectic group. There was quite a few of  
15           the -- you know, NEEP was in there. There  
16           was builders in there. There was raters in  
17           there. There was code officials in there.

18                        And we worked through three  
19           amendments that were pretty much energy  
20           neutral that we thought would give the  
21           builders and, you know, the raters some  
22           flexibility.

23                        What the lady before me said is  
24           correct. Delaware does -- we make three air





1 changes per hour all the time on  
2 moderate-sized houses.

3 The problem is when you go to  
4 smaller houses, and particularly  
5 slab-on-grade houses, it's very difficult to  
6 get that three air changes per hour.

7 So we proposed -- one of the  
8 amendments we proposed was energy neutral,  
9 which said, hey, if you can't get those three  
10 air changes per hour, if you increase your  
11 HVAC efficiency, you know, it's going to make  
12 up the difference, and you're going to be  
13 able to accomplish, you know, the same energy  
14 efficiency without penalizing these guys that  
15 are building super-small houses that, you  
16 know, three air changes per hour on a 1,000  
17 square foot slab-on-grade house is, you know,  
18 less than 400 CFMs. It's not a lot of air to  
19 lose.

20 We also added pan returns went in a  
21 conditioned space. Again, energy neutral, if  
22 it's within the conditioned space, whether  
23 the return is panned or it's ducted, there is  
24 no energy difference. You're still returning



1 the same condition there.

2 Then the other one concerned the  
3 installation of waterlines.

4 Those three amendments, we talked  
5 about them for over a year. Everybody was in  
6 agreement.

7 Then, at the very last minute,  
8 somebody at DNREC who never attended a single  
9 meeting throughout those amendments, and just  
10 decided to go with the code unamended.

11 So I just want to express my  
12 displeasure with that process.

13 I mean, if you had 15 people that,  
14 you know, devoted probably 25, 30 hours each  
15 to this coalition, then whoever was going to  
16 make that final decision should have at least  
17 come in and explained their thought process  
18 on why they were marking that decision and  
19 kind of talked through that with us, or at  
20 least hear some of the other -- the other  
21 sides of the story, so to speak, rather than  
22 just relying on the letters that were sent by  
23 a lot of the insulation companies and the  
24 insulation companies' packs.



1 Thank you.

2 MS. NEWMAN: Thank you. Joe  
3 Gordon.

4 MR. GORDON: Another Delawarean up  
5 here. Joe Gordon, 22906 East Trap Pond Road,  
6 Georgetown, Delaware, 19947.

7 I wanted to concur with BJ. We  
8 actually had more than 11 meetings. We went  
9 back to 2016 on this particular code cycle.  
10 We had 14 meetings and with various experts  
11 working out these three amendments.

12 Seventy hours spent in good faith.  
13 That's two hours in time meeting, an hour and  
14 a half back and forth to my office, a half  
15 hour prep, and a half hour -- and that's not  
16 even including like, you know, corresponding  
17 with your associations and the rest of that.  
18 That's totally separate.

19 I know I spent at least 70 hours  
20 just in the meetings for this.

21 Why is it important? The  
22 amendments are important -- I'm going to  
23 outline one, the blower door specifically.  
24 To use air exchanges per hour under 50



1 Pascals does not work. It's mathematically  
2 biased against smaller houses.

3 Taking a 2D measurement and  
4 performing a 3D calculation on it doesn't  
5 work out.

6 That 3D is our denominator. And so  
7 we take a measurement, right, and then we use  
8 the 3D to divide that measurement.

9 Well, the problem is 2D and 3D have  
10 an exponential relationship.

11 A quick example, because I've got  
12 the time: A 2,000 square-foot house, it's  
13 200 feet by 10-foot. Right? We go from  
14 eight-foot ceilings to nine-foot ceilings.  
15 We've added 2,000 cubic feet to our  
16 denominator, that which divides our  
17 measurement. Right?

18 How much opportunity for leakage,  
19 square footage wise, have we added to that  
20 house? 200 plus ten plus 200 plus ten is 420  
21 square feet of opportunity for leakage; so  
22 there is an exponential relationship there  
23 between the opportunity for leakage and  
24 your -- the volume of the house.



1                   What does it mean? It means that  
2                   if you add up all the cracks in the house to  
3                   try to find out what size hole we are trying  
4                   to get to -- right -- so in a small house,  
5                   you're going to have an eight-inch hole is  
6                   failing and a six-inch hole is passing, where  
7                   in the 3,000 square foot house on a 9-foot  
8                   basement, you're going to have a 2-foot hole  
9                   is failing, and then a foot and three-quarter  
10                  is passing.

11                  It's mathematically biased against  
12                  smaller houses.

13                  You don't have to put that much air  
14                  seal at all in a huge house, whereas in a  
15                  981-foot square foot house on an  
16                  unconditioned crawlspace with an 8-foot  
17                  ceiling, it's damn near impossible to get it  
18                  to three air exchanges per hour and 50  
19                  Pascals.

20                  I really would appreciate it if you  
21                  guys would have a look at the amendments that  
22                  we all spent so much time working out,  
23                  because that's just one. There is a lot of  
24                  thought that went into those amendments and a



1 lot of people's time.

2 Thank you.

3 MS. NEWMAN: Thank you. Okay.

4 I'm going to try to say this, and I  
5 apologize if I don't say it correctly. Is it  
6 Bahareh?

7 MS. VANVOEKHOLV: Bahareh  
8 Vanvoekholv.

9 MS. NEWMAN: Thank you. Could you  
10 please restate your name and spell it for the  
11 record?

12 MS. VANVOEKHOLV: Sure. It's  
13 Bahareh Vanvoekholv. It's B-A-H-A-R-E-H,  
14 last name Vanvoekholv, V-A-N-V-O-E-K-H-O-L-V.

15 I'm the co-chair of Delaware  
16 Committee of Green Building United. We are  
17 the local organization, local group of the  
18 organization named Green Building United,  
19 which is a non-profit organization active in  
20 Kent County, including Delaware County,  
21 Delaware Valley, and also Lehigh Valley.

22 We are here to support the adoption  
23 of Code RECC 2018 and ASHRAE Standards of  
24 90.120-16 unamended.



1           We submitted our comments via  
2           e-mail today, and I'm going to submit a hard  
3           copy today, as well.

4           We basically kind of support that  
5           it should be amended. It's really important.  
6           Delaware, under statute, we had achieving two  
7           net zero by 2025 for commercial, 2030 for  
8           residential. And to get there, this is the  
9           first step. We have to raise the floor.

10          But I want to use this opportunity  
11          to actually address some of my really good  
12          colleagues' comments here, Mr. Marston, BJ,  
13          and Joel.

14          And I had the pleasure of working  
15          with them in different capacity. We all --  
16          in Delaware, that's the joy, that we all work  
17          together, and we all actually want to make it  
18          the best. And it's nice to see everybody is  
19          actually so invested.

20          I want to say I agree. I agree  
21          that it's hard. But I'm a parent. If my  
22          children come to me and they say it's hard, I  
23          will say, "I know. Go try harder, because I  
24          want you to do better."



1 I want to say that in Delaware,  
2 Delaware State Housing Authority put on the  
3 requirement to kind of meet Energy Star and  
4 code exchange -- you know, three code  
5 exchangers.

6 And low-income, multifamily  
7 building built with the minimum financing  
8 meet the three air exchanges for holes that  
9 are up to 900, affordable multifamily.

10 Yes, builder have to try hard.  
11 They have to check things. Again, it wasn't  
12 easy, but it is possible.

13 Old Lady of Grace, another  
14 low-income multifamily building, units  
15 between 700 square foot to 1,200 square foot,  
16 they are also built to three air exchanges  
17 and less.

18 So I want to say it is hard, but it  
19 is possible. They are building it ten  
20 minutes from here. They are building it in  
21 New Castle County.

22 And it takes some training, and it  
23 takes some willing and hard work.

24 I think there are resources





1 available to provide the training and make  
2 sure that people are actually building to  
3 those standards.

4 It's really important to get the  
5 air tightness here.

6 We reiterated that we would like  
7 DNREC to consider adopting the code as it is  
8 with no loosening of air tightness, because  
9 it affects the health and safety and air  
10 quality of the residents.

11 That's what I want to kind of  
12 close. And I want to add our organization,  
13 Green Building United, secured funding in  
14 considering to provide training for builders  
15 so they can build better homes and higher  
16 standards.

17 Nobody says it's easy. Nobody  
18 says, you know, they can do it now. But it's  
19 possible. They are doing it.

20 And for Mr. Marston, above New  
21 Jersey there are different code compliance  
22 paths in New Jersey. You have three  
23 different compliance paths.

24 So kind of simplifying and saying



1 they don't check may not do the justice.

2 Other jurisdictions are holding to  
3 higher standard. Delaware can do it. We are  
4 the first state. We have high goals. We can  
5 do it.

6 We want our builders to be in par  
7 with other builders. We want them to provide  
8 the resources for them. We want to train  
9 them. We want to empower them.

10 So even though it's hard, I agree,  
11 and I agree that we are all working, we want  
12 to be able to build these better homes that  
13 we are all proud of.

14 So, with that, I want to state my  
15 address. I live at 5 Jackson, Newark,  
16 Delaware. And we would like to be part of  
17 the solution to provide training to support  
18 builders to build to higher standards.

19 Thank you for the opportunity.

20 MS. NEWMAN: Okay.

21 Mrs. Vanvoekholv, is this the same letter  
22 that was submitted via e-mail?

23 MS. VANVOEKHOLV: Yes.

24 MS. NEWMAN: Okay. So we have



1 already your document marked as a part of the  
2 record and the Department's Exhibits Number  
3 16, I believe. Yes. So I will take this as  
4 a copy, but we have already marked it into  
5 the record.

6 Is there anybody else who has  
7 signed in that would like to provide comment  
8 at this time that marked no?

9 Is there anybody who did not sign  
10 in that would need to sign in? Okay.

11 MR. MARSTON: A point of protocol.  
12 I have had two people reference me  
13 specifically.

14 May I speak to their statements  
15 regarding me, my comments to this code  
16 adoption?

17 MS. NEWMAN: We cannot, because  
18 there is no yielding of time between one  
19 commenter to another commenter.

20 If you already did your three  
21 minutes of your comment, that's all you are  
22 allowed.

23 However, you are able to submit a  
24 written comment to whatever you would like



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to, and that is either you can handwrite it  
or submit it to our electronic e-mail in-box.

Okay. In addition to the comments  
that were received by the Department, I do  
have two additional comments that I would  
like to mark into the record that were not  
a part of the comments presented by Jessica.

So we have exhibit, Yerkes Exhibit  
Number 1, comment received, and Lacey  
Exhibit 1, comment received.

Okay. So, with no further comment  
being received by the public, let the record  
reflect it is now 6:34, and the hearing is  
adjourned.

(Concluded at 6:34 p.m.)

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CERTIFICATE

I, Lorena J. Hartnett, a Notary Public and Registered Professional Reporter, do hereby certify that the foregoing is an accurate and complete transcription of the proceeding held at the time and place stated herein, and that the said proceeding was recorded by me and then reduced to typewriting under my direction, and constitutes a true record of the testimony given by said witnesses.

I further certify that I am not a relative, employee, or attorney of any of the parties or a relative or employee of either counsel, and that I am in no way interested directly or indirectly in this action.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my seal of office on this 8th day of December 2019.



\_\_\_\_\_  
Lorena J. Hartnett  
Registered Professional Reporter

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