



VIA E-MAIL

August 24, 2020

Technical Model Code Review Committee
Oregon Building Codes Division
1535 Edgewater Street NW
Salem, OR 97304

RE: NAIMA's Comments on Proposed Revisions to Chapter 11, Energy Efficiency, of the Oregon Residential Specialty Code

Dear Members of the Technical Model Code Review Committee:

The North American Insulation Manufacturers Association ("NAIMA") submits the following comments on proposed revisions to the Oregon Residential Specialty Code ("ORSC") in response to a request for public comments issued August 11, 2020. NAIMA is the trade association for the North American manufacturers of fiber glass and rock and slag wool insulation products. NAIMA promotes energy efficiency and pollution reduction through energy savings achieved through the use of thermal insulation products.

NAIMA appreciates Oregon's reputation as a leading state in energy efficiency through sustainable construction. Toward that end, the ORSC traditionally includes measures that go beyond the model code in promoting efficient construction while maintaining flexibility and maximizing options for builders. These comments address proposed changes to Table N1101.1(2) of the 2021 ORSC that may be contrary to these objectives.

THE 2021 ORSC PROPOSED DRAFT COMBINED THE ENVELOPE ENHANCEMENT MEASURES OF TABLE N1101.1(2) AND THE CONSERVATION MEASURES OF TABLE N1101.1(2)

In the most recent edition of the 2021 ORSC draft, Table N1101.1(2) has combined each category to make a consolidated one-category table with fewer measures explicitly referenced. Heating and cooling equipment efficiency requirements are established by federal law, while envelope measures are established by state energy code. This divergence in point of regulation increases the risk that co-mingling envelope and mechanical requirements in the code will lead to a less stringent code simply by following federal law. This proposed change has the practical effect of reducing builder flexibility in meeting the requirements of the energy code. Maintaining options and flexibility in the code is critical for builders as there is no one-size-fits-all approach to the construction industry.

NAIMA urges the Division to maintain the 2017 ORSC two-category structure of Table N1101.1(2) in the 2021 version.

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CONCLUSION

NAIMA supports Oregon's efforts to continue to improve their residential building codes. Please contact me at jmartell@naima.org if you have any questions or would like to discuss NAIMA's comments in more detail.

Sincerely,

Joel Martell

Joel Martell
Director – Technical Services