

Lepore, Theresa (DPS)

From: McCarthy, Jean (DPS) on behalf of DPSinfo (DPS)
Sent: Monday, August 24, 2015 12:40 PM
To: Lepore, Theresa (DPS)
Subject: FW: EO562

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From: McWhite, Christopher
Sent: Monday, August 24, 2015 11:21 AM
To: DPSinfo (DPS)
Cc: Shanahan, Shaun
Subject: EO562

Promulgation Team,

I would like to thank you for taking on this monumental task of coordinating all regulations and codes as proposed for adoption in 2016 to be known as 780 CMR 9th edition.

I have taken a quick walk through a few sections of the proposed code changes as provided in a red-letter edition on the state website and have a couple of requests for consideration.

1. 780 CMR IRC §301.1.1, 4 directs the Code Official to accept AF&PA DCA6, but it stops short of stating which year edition to accept. Shall we continue to accept the 2006 as in the 8th edition of the code or a more current edition?
2. Was it the intention of BBRS to delete (Reserve) §R301.2.1.2 to allow additional time to discuss alternatives to expensive glazing installations in high wind districts? Admittedly, working shutters and high impact glazing is costly so I am curious to know what alternatives are being considered at this time.
3. §R302.13 it appears that the exceptions provided by the virgin code have been truncated to a single exception. In my opinion it doesn't seem a good idea to remove from the code exception 2-4 because these exceptions are previously accepted at least in some part by amendment in the 8th edition
4. §R303.3 – Was it intended to eliminate the use of operable windows as a means of ventilation of bathrooms, water closet compartments and other similar rooms? Instead fully relying on mechanical ventilation as prescribed by §M1507? This could be an unnecessarily costly requirement in homes where the use of natural ventilation has been a time honored solution to passive venting of humid air. Is there new evidence that this passive means of ventilation is no longer considered healthy due to mold accumulation, high moisture buildup in sensitive non-structural and structural components, etc.?
5. §R901.1 and §R906.1 – suggest changing the word must to shall: "...conservation requirements of chapter 11 ~~must~~ shall also be satisfied."