

**How to comment on addendum “am”,
the ASHRAE 189.1 proposal to reduce window area**

Comments must be posted by Monday, June 17

1) First prepare your comments in a word document.

Later you will cut and paste your comments into the ASHRAE comment website.

Some issues you can raise are included later, but write your comments in your own way and add any other points you feel are important. Individual comments are more effective than many people submitting the same comment.

Also, please focus your comments on the specific proposal to reduce glazing area, not ASHRAE or the committee. Feel free to criticize the proposal as much as you like, but it will not help us to criticize ASHRAE or certain members of the committee.

2) Go the ASHRAE comment website:

<https://www.ashrae.org/standards-research--technology/public-review-drafts>

3) Click on the “Click Here” button.

4) Scroll toward the bottom under the heading “45-Day Public Review Period from May 3, 2013 - Jun 17, 2013”, and look for the 2nd item, which starts out “BSR/ASHRAE/USGBC/IES Addendum am ...”

You may click on the link with the name of the document if you want to see another copy of the proposal (same as what I sent out previously).

5) Click on the “Comments” link to the left of the addendum “am” name.

6) Login as a new commenter using the link at the bottom, or if you have previously registered, log in using your email and password.

7) On the next screen, make sure it lists the document at the top as addendum “am” them click the “New Comment” button.

8) Type in your name exactly as shown and hit the “I Agree” button.

9) Now you are finally at the comment screen.

a) Fill out your affiliation or company

b) Comment title: just give your comment a short title

(e.g. “Withdraw addendum am” or “Concerns with addendum am” or “Proposal fails to address human impacts” or something about your comments)

c) Comment Type: choose “Substantive”

d) Section / Subsection Type: choose “**Sub-clause**”

e) Section / Subsection Number: type “**7.4.2.4**”

f) Supportive: select “**NO**” ← *This is very important.* If you accidentally choose “yes”, your comment will not be addressed by the committee and may not even be read.

g) Attachments: you may attach a letter with your comments if you wish, but you don’t have to. You can just enter your comments into the next two fields.

If you do submit your comments as an attached letter, make sure to also include your specific requested action along with your comments – in this case, “withdraw addendum am.”

h) Comment (Proposed Text): This is not your body of comments, but what you are proposing. *Important* – you must propose a specific action or change. In this case, simply type “**Withdraw addendum am.**”

i) Substantiating Statements: This is where you paste your main comments.

If your comments are particularly long with multiple topics, you can also break it into parts and submit each part as a separate comment, if you want.

j) Click the “**Submit**” button

If you have *any* questions, please feel free to contact me at culp@birchpointconsulting.com or 608-788-8415. I’ll gladly help walk you through the process.

Issues on ASHRAE 189.1 Addendum “am”

This is a partial list of potential issues you may want to write about in your comments. Pick and choose, or add any other points or your own ideas. *Try not to just cut and paste* – a personalized individual comment will have much more impact. These are just some of the basic issues, and you may want to add more details and thoughts. I’ll also be filing much more detailed comments, and you can contact me if you want to discuss more details.

The proposal ignores the human impacts of windows and views, and doesn’t account for the potential harm to building performance and occupants from reducing window area and views by 25%.

The proposal only claims small energy savings, but ignores the benefits of daylighting and views upon the performance of occupants and indoor environmental quality. There are numerous studies showing the benefit of quality views and daylighting on productivity, performance, student testing, retail sales, and occupant health. This proposal is in direct conflict with the purpose of the standard, which is the design of “high performance green buildings” and specifically includes “occupant comfort and well-being.”

The proposal is oversimplified, does not consider the many aspects of building design, and hinders design flexibility for architects.

The proposal makes a punitive 25% reduction to window area after only looking at claimed energy savings for one simplified building. Building design is much more complex, and the architect needs the flexibility to consider building type and function, building location, the use of each space within the building, window and glazing type (including new high performance products), daylighting, views, glare, occupant comfort, connection to outdoors, aesthetics and real estate values, etc. This proposal significantly harms design flexibility without adequate justification.

The technical analysis does not justify the 25% reduction in window area.

The technical analysis only considered one building type (a medium office) that certainly does not apply to the wide range of buildings covered by the standard (schools, healthcare, restaurants, midrise apartments, retail, hotels, manufacturing, government, etc.). Moreover, the detailed assumptions in the analysis were not made public, and we have doubts about whether they are correct.

The proposal conflicts with other green standards such as LEED.

There is no doubt that reducing glazing area by 25% will impact the access to views and quality of views, making it more difficult to achieve the daylighting and access to views credits in LEED. It makes no sense for ASHRAE 189.1 to head in an opposite direction than LEED.

The proposal will have a negative financial and economic impact on building owners.

Window and glazing area is an important aspect of building value, and this proposal will have a negative effect on real estate values, and rental / lease rates. Furthermore, multiple studies have shown that decreased and lower quality views can harm the functionality of the building through decreased productivity, performance, sales, etc. This financial and economic impact will dwarf any small amount of energy savings, and was not considered in the proposal.

The proposal ignores the fact that building owners and occupants like expansive window views.

Code proposals that are not accepted by the public will not be used or enforced, and will lead to decreased use of ASHRAE 189.1.