

Resolution No. 4

Date: 6/10/2023

City: Washington, DC

NAHB Resolution

Title: Ventilation Standards
Sponsor: Building Codes & Standards Subcommittee of the Construction, Codes & Standards Committee
Submitted by: Jon Sukonik

WHEREAS, state legislative bodies and government agencies are proposing and adopting new legislation and regulations banning gas appliances;

WHEREAS, source control is an effective and important element of the strategy for addressing air pollutants in housing, including from outdoor air pollutants, moisture, formaldehyde, volatile organic compounds, pesticides, combustion spillage and radon;

WHEREAS, there is a general lack of data relating to indoor air pollutants, pollutant levels, occupant exposure, and outdoor air exchange rates to potential health-based outcomes to occupants in new homes, and the research available is from a few small-scale and short-term studies;

WHEREAS, contemporary published research indicates that the focus of interest in residential indoor environments has shifted largely away from evaluating the effects of volatile organic compounds to evaluating the effects of respirable particles;

WHEREAS, ventilation is the primary strategy for dilution and removal of volatile compounds and filtration is the primary strategy for management of respirable particles;

WHEREAS, changes to ventilation and filtration requirements in residential construction codes and standards are being proposed in the absence of comprehensive occupant health-based data;

WHEREAS, results of a recent DOE-funded indoor air quality study are pending and expected to be released within the next two years;

WHEREAS, ventilation rates in multifamily buildings have been increased for the 2024 IMC to align more closely with commercial ventilation rates without adequate justification;

WHEREAS, the added energy cost resulting from excessive ventilation can be substantial and can diminish the value of the energy efficiency features in new homes;

WHEREAS, excessive ventilation in humid climates triggers the need for installation of active supplemental dehumidification equipment at high first cost, high operational energy cost, and high maintenance costs;

WHEREAS, regional climates have a large impact on effective ventilation strategies;

WHEREAS, a heat recovery ventilator (HRV) or energy recovery ventilator (ERV) can add \$1,800-3,000 to the price of an average house, above the cost of a code-compliant whole-house ventilation system;

WHEREAS the National Association of Home Builders strives to ensure that housing is a national priority and that all Americans have access to safe, decent and affordable housing;

NOW, THEREFORE, BE IT RESOLVED that the National Association of Home Builders (NAHB):

1. Urge the federal government, and private sector codes and standards developers, to work cooperatively together, and with NAHB, to conduct research on ventilation for acceptable indoor air quality that:
 - (a) More precisely identifies and quantifies the indoor air quality conditions that exist in homes, and
 - (b) Determines the impact of proposed changes to ventilation requirements on construction costs, energy consumption, moisture control, maintenance costs, and occupant comfort.
2. Support federal legislation to provide research funding to evaluate indoor air quality in homes.
3. Support research programs on indoor air quality in residential buildings.

BE IT FURTHER RESOLVED that NAHB support the ability of state and local jurisdictions to amend the national model codes based on regional differences in climates and occupant preferences.

BE IT FURTHER RESOLVED that NAHB oppose legislation or construction codes or standards that increase indoor ventilation rates and related costs in residential buildings unless it is demonstrated through health-based field studies, including pollutant levels and outdoor air exchange rates, that a significant indoor air quality problem exists, is solved by additional ventilation air exchange, and that the problem cannot be addressed by source control and/or better design of ventilation systems.

BE IT FURTHER RESOLVED that NAHB support a range of strategies for kitchen ventilation including point exhaust, general kitchen exhaust, filtration, operable windows, and combinations thereof.

BE IT FURTHER RESOLVED that NAHB support the evaluation of strategies for air filtration within the overall framework of ventilation system design.

BE IT FURTHER RESOLVED that NAHB support a range of humidity control strategies for humid climates including the use of improved controls and advanced operational protocols that maximize the dehumidification performance of cooling systems.

Leadership Council Action:	Approved
Resolutions Committee Action:	Recommends Approval
Construction, Codes & Standards Committee Action:	Recommends Approval
Custom Home Builders Committee Action:	Recommends Approval
State and Local Government Affairs Committee Action:	Recommends Approval
Federal Governmental Affairs Committee Action:	Recommends Approval
Single Family Builders Committee Action:	Recommends Approval
Building Codes & Standards Subcommittee of the Construction, Codes & Standards Committee Action:	Recommends Approval
Energy and Green Codes and Standards Subcommittee of the Construction, Codes & Standards Committee Action:	Recommends Approval

If approved, this resolution will incorporate and supersede the following current policies: 2018.7 No. 5 Ventilation Standards, 2012.6 No. 3 Ventilation Standards and 1995.1 No. 1 Exhaust Fan Requirements.