Code Amendment Proposal Form
For public amendments proposed to the 2018 editions of the International Codes

Instructions: Upload this form and all accompanying documentation at www.denvergov.org/BuildingCode. If you are submitting your proposal on a separate sheet, make sure it includes all information requested below.

All proposals must be received by April 26, 2019.

CONTACT INFORMATION
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Signature:

Co-proposed by: Amber Wood, Denver Department of Public Health and Environment
Jim Meyers, Southwest Energy Efficiency Project

AMENDMENT PROPOSAL

Please use a separate form for each proposal.

1) Code(s) associated with this proposal. Please use acronym: IECC

If you submitted a separate coordination change to another code, please indicate which code:

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Code Name</th>
</tr>
</thead>
<tbody>
<tr>
<td>DBC-xxxx</td>
<td>Denver Building Code–xxxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)</td>
</tr>
<tr>
<td>IBC</td>
<td>International Building Code</td>
</tr>
<tr>
<td>IEBC</td>
<td>International Existing Building Code</td>
</tr>
<tr>
<td>IECC</td>
<td>International Energy Conservation Code</td>
</tr>
</tbody>
</table>

2) Please check here if a separate graphic file is provided: ☐

Graphics may also be embedded within your proposal below.

3) Use this template to submit your proposal or attach a separate file, but please include all items requested below in your proposal. The only formatting needed is BOLDING, STRIKEOUT AND UNDERLINING. Please do not provide additional formatting such as tabs, columns, etc., as this will be done by CPD.

| Code Sections/Tables/Figures Proposed for Revision: |
| IECC C202 |

Proposal:

Revise the definition of “Wall, Above Grade” as follows:
**WALL, ABOVE-GRADE.** A wall associated with the building thermal envelope that is more than 15 percent above grade and is on the exterior of the building or any wall that is associated with the building thermal envelope that is not on the exterior of the building. This includes, but is not limited to, between-floor spandrels, peripheral edges of floors, roof and basement knee walls, dormer walls, gable end walls, walls enclosing a mansard roof and skylight shafts.

**Supporting Information:**

**Purpose:**

The purpose of this proposal is to clarify the building elements subject to the above wall envelope requirements.

**Reason:**

The current definition of above-grade wall is general and vague and allows for an interpretation that ignores the thermal performance of important building elements. For example, the existing definition is not clear that exposed floor edges are part of the above-grade wall. Depending on how the code is interpreted/enforced, this could leave this building element unregulated.

This change to the definition clarifies it and closes this potential loophole. It is explicitly clear that the critical elements of a building that function as part of the thermal envelope, even though they may not be thought of as walls, are regulated as walls. These elements will need to be either insulated to meet the above-grade wall requirements or be incorporated into weighted averages for the performance of the above-grade wall.

The language was drawn from the definition currently used in the WA state energy code.

**Referenced Standards:**

NA

**Note:** List any new referenced standards that are proposed to be referenced in the code.

**Impact:**

The effect of the proposal on the cost of construction: ☒ No Effect

- This proposal merely clarifies the definition, so it will only increase the cost of construction of projects that would use the lack of clarity to avoid meeting code requirements.

The effect of the proposal on the cost of design: ☒ No Effect

Is the proposal more or less restrictive than the I-codes: ☒ Same

**Departmental Impact:** (To be filled out by CPD staff)

**Note:** CITY STAFF ONLY. Discuss the impact of this proposal in this section AND indicate the impact of this amendment proposal for each of the following:

- The effect of the proposal on the cost of review: ☐ Increase ☐ Reduce ☒ No Effect
- The effect of the proposal on the cost of enforcement/inspection: ☐ Increase ☐ Reduce ☒ No Effect