

# Code Amendment Proposal Form

For public amendments proposed to the 2021 editions of the International Codes



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

All proposals must be received by **July 23, 2021**.

## CONTACT INFORMATION

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**Organization or Representing Self:** Self

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**Signature:**

## AMENDMENT PROPOSAL

**Please use a separate form for each proposal.**

- 1) Code(s) associated with this proposal. Please use acronym: \_\_\_\_\_  
If you submitted a separate coordination change to another code, please indicate which code: \_\_\_\_\_

<u>Acronym</u>	<u>Code Name</u>	<u>Acronym</u>	<u>Code Name</u>
<b>DBC-AP</b>	Denver Building Code–Administrative Provisions	<b>IFC</b>	International Fire Code
<b>DBC-xxx</b>	Denver Building Code–xxx (code) amendments (e.g., DBC-IBC, DBC-IEBC)	<b>IFGC</b>	International Fuel Gas Code
<b>IBC</b>	International Building Code	<b>IRC</b>	International Residential Code
<b>IEBC</b>	International Existing Building Code	<b>IMC</b>	International Mechanical Code
<b>IECC</b>	International Energy Conservation Code	<b>IPC</b>	International Plumbing Code
		<b>DGC</b>	Denver Green Code

- 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:

**R402.2.9 (IRC N1102.2.9) Basement walls**

**Note:** If the proposal is for a new section, indicate (new).

### Proposal:

**R402.2.8 Basement walls.** Basement walls shall be insulated in accordance with Table R402.1.3 or the installed R-value shall be in accordance with the compliance path that is defined at the time of obtaining the building permit.

**Exception:** Basement walls associated with unconditioned basements where all of the following requirements are met:

1. The floor overhead, including the underside stairway stringer leading to the basement, is insulated in accordance with ~~Section Table~~ R402.1.3 and applicable provisions of Sections R402.2 and R402.2.7.
2. There are no uninsulated duct, domestic hot water, or hydronic heating surfaces exposed to the basement.
3. There are no HVAC supply or return diffusers serving the basement.
4. The walls surrounding the stairway and adjacent to conditioned space are insulated in accordance with Section R402.1.3 and applicable provisions of Section R402.2.
5. The door(s) leading to the basement from conditioned spaces are insulated in accordance with Sections R402.1.3 and applicable provisions of Section R402.2, and weather-stripped in accordance with Section R402.4.
6. The building thermal envelope separating the basement from adjacent conditioned spaces complies with Section R402.4.

### **R402.2.8.1 Basement wall insulation installation**

Where *basement walls enclosing conditioned basements* are insulated, the insulation shall ~~be installed from the top of the basement wall down to 10 feet (3048 mm) below grade or to the basement floor, whichever is less~~ comply with the following:

1. Where exterior basement wall insulation is installed, it shall be permanently attached to the wall and extend downward from the sill plate to not less than the footing or 10 feet, whichever is less.
2. Where interior basement wall insulation is installed, it shall extend downward from the sill plate at the top of the foundation wall to the finished floor below.

**Note:** Show the proposal using ~~strikeout~~, underline format. At the start of each section, give one of the following instructions:

- Revise as follows:
- Add new text as follows:
- Delete and substitute as follows:
- Delete without substitution:

### **Supporting Information:**

#### Reason Statement

The R-value of the installed material will depend on the compliance path chosen and could vary.

The exception defines an unconditioned basement and refers to a section of code that is a table, and then should point directly to floor insulation installation to separate the unconditioned basement from the conditioned living space above. The proposal fixes this confusion.

Foundation walls that define a basement can and often are insulated from the exterior. The language has been changed in this proposal to provide requirements for installation for not only interior application but also exterior insulation installation. Both installs require full coverage from the sill plate downward as was done with the stricken language to ensure full coverage.

Cost

This proposal does not impact the cost of construction. Instead, it provides greater flexibility in how basement assemblies can be insulated. It also better defines unconditioned basements and how to insulate from the interior or exterior.

**Note:** This section MUST include these items:

- **Purpose:** State the purpose of the proposed amendment to physical, environmental and customary characteristics that are specific to the City and County of Denver (e.g., clarify the code; revise outdated material; substitute new or revised material for physical, environmental and customary characteristics; add new requirements to the code; delete current requirements, etc. to reflect physical, environmental and customary characteristics that are specific to the City and County of Denver)
- **Reasons:** Clearly justify the change to current code provisions, stating why the proposal is necessary to reflect physical, environmental and customary characteristics that are specific to the City and County of Denver. Proposals that add or delete requirements shall be supported by a logical explanation that clearly shows why the current code does not reflect physical, environmental and customary characteristics that are specific to the City and County of Denver and explains how such proposal will improve the code.
- **Substantiation:** Substantiate the proposed amendment based on technical information and substantiation. Substantiation provided which is reviewed and determined as not germane to the technical issues addressed in the proposed amendment shall be identified as such.
- **Bibliography:** Include a bibliography when substantiating material is associated with the amendment proposal. The proponent shall make the substantiating materials available for review.

**Referenced Standards:**

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

**Impact:**

There is no cost impact associated with this code proposal as it only clarifies the existing installation requirements of the code that are not adequately defined in the current section of the code

**Note:** 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 construction:     Increase     Reduce     No Effect
- The effect of the proposal on the cost of design:         Increase     Reduce     No Effect
- Is the proposal more or less restrictive than the I-codes:    More         Less         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