GEW81-14 605.2

Proponent: Brenda Thompson, Chair, representing ICC Sustainability, Energy, and High Performance Code Action Committee (SEHPCAC@iccsafe.org)

Delete without substitution:

605.2 Roof replacement. Above-deck insulation for roof replacement on an existing building with insulation entirely above the deck and where the roof slope is less than two units vertical in 12 units horizontal (17-percent slope) shall be in accordance with Section 1003.2.7.

Reason: Section 605.2 of the IECC is unnecessary because the IgCC is an overlay to the IECC and the 2015 IECC already contains this requirement. Furthermore, specific **e**xisting building provisions should not be referenced in the other chapters of the code. This provision is simply a referral to Section 1003.2.7. It is unnecessary. Having references to some existing provisions and not all results in inconsistency in the code that could have legal implications.

The requirements of Section 1003.2.7, as shown below, are not really requirements. Section 1003.2, the parent section, references Sections 1003.2.1 through 1003.2.7, and any combination of this sections, or any single section, can be used to comply with Section 1003.2.

1003.2.7 Roof replacement insulation. For roof replacement on an existing building with insulation entirely above the deck and where the roof slope is less than two units vertical in 12 units horizontal (16-percent slope), the insulation shall conform to the energy conservation requirements for insulation entirely above deck in the *International Energy Conservation Code*.

Exception: Where the required R-value cannot be provided due to thickness limitations presented by existing rooftop conditions, including heating, ventilating and air-conditioning equipment, low door or glazing heights, parapet heights, proper roof flashing heights, the maximum thickness of insulation compatible with the available space and existing uses shall be installed.

The 2015 IECC provisions related to this topic are as follows:

C503.3 Building envelope. New building envelope assemblies that are part of the alteration shall comply with Sections C503.3.1 through C503.3.3.

C503.3.1 Roof replacement. For roof replacements, where the existing roof assembly is part of the *building thermal envelope* and contains insulation entirely above deck, roof replacement shall include compliance with the requirements of Table C402.1.3 or Table C402.1.4.

(Balance of C503.3 subsections not shown)

This proposal was submitted by the ICC Sustainability Energy and High Performance Code Action Committee (SEHPCAC). The SEHPCAC was established by the ICC Board of Directors to pursue opportunities to improve and enhance International Codes with regard to sustainability, energy and high performance as it relates to the built environment included, but not limited to, how these criteria relate to the International Green Construction Code (IgCC) and the International Energy Conservation Code (IECC). This includes both the technical aspects of the codes as well as the code content in terms of scope and application of referenced standards. In 2012 and 2013, the SEHPCAC has held six two-day open meetings and 50 workgroup calls, which included members of the SEHPCAC as well as any interested parties, to discuss and debate proposed changes and public comments. Related documentation and reports are posted on the SEHPCAC website at: http://www.iccsafe.org/cs/SEHPCAC/Pages/default.aspx.

Cost Impact: Will not increase the cost of construction.

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