

ADVISORY COMMITTEE COMMENT FORM FOR PROPOSED CODE CHANGES

(This form must be submitted electronically)

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1323 CE-16A

Proposed Code Change - Language

Please provide your proposed code change in strikeout/underline format. Provide the *specific* language you would like to see changed, with new words underlined and words to be deleted should be ~~stricken~~. Also, state whether the language contained in your proposal is from a code book or from an amendment currently found in Minnesota Rule. (You may provide the language (electronically) on a separate, attached sheet).

2012 IECC Chapter 4 Commercial Energy Efficiency
Section C402.4.1.1 Air Barrier Construction
Revise the following sections:

3. Recessed lighting fixtures shall comply with Section C402.4.8. Where similar objects are installed which penetrate the air barrier, provisions shall be made to maintain the integrity of the air barrier.

~~**Exception:** Buildings that comply with Section C402.4.1.2.3 are not required to comply with items 1 and 3.~~

Proposed Code Change – Need and Reason

Please provide a thorough explanation of the need for this change and why this proposed code change is a reasonable change. During the rulemaking process, the Agency must defend the need and reasonableness of all its proposed changes. The Agency must submit evidence that it has considered all aspects of the proposal. (You may provide the need and reason (electronically) on a separate attached sheet).

Need:

This exception allows buildings that have a blower door test that meets minimum air leakage requirements to avoid providing air barrier continuity and avoid sealing around air barrier penetrations. This seems reasonable on an energy consumption basis: if the required minimum air leakage is achieved, why does it matter where the leaks are? It matters because, although the

overall shell leakage rate might be low, the measured air leakage could be coming from a few large remaining leaks that could cause moisture damage.

Reason

Current building science acknowledges that the most severe cases of moisture damage come from air leakage. This exception encourages sloppy air barrier design and construction that is then band-aided by spray foam just up to the point where the code is met, a process which may still allow concentrated areas of damaging leakage to remain.

Proposed Code Change – Cost/Benefit Analysis

Please consider whether this proposed code change will increase/decrease costs or indicate that it will not have any cost implications and explain how it will not. If there is an increased cost, will this cost be offset somehow by a life safety or other benefit? If so, please explain. Are there any cost increases/decreases to enforce or comply with this proposed code change? If so, please explain. (You may provide the cost/benefit analysis (electronically) on a separate, attached sheet).

Cost/benefit Analysis:

Allowing this exception to remain will cost a lot more in the long run than the small amount saved by cutting corners in the beginning.

Other Factors to Consider Related to Proposed Code Change

1. Is this proposed code change meant to:

change language contained in a published code book? If so, list section(s).

change language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

delete language contained in a published code book? If so, list section(s).

Exception to C402.4.1.1

delete language contained in an existing amendment in Minnesota Rule? If so, list Rule part(s).

neither; this language will be new language, not found in the code book or in Minnesota Rule.

2. Is this proposed code change required by a Minnesota Statute or new legislation? If so, please provide the citation to the Statute or legislation. **No**

3. Will this proposed code change impact other sections of a published code book or of an amendment in Minnesota Rule? If so, please list the affected sections or rule parts. **No**

4. Will this proposed code change impact other parts of the Minnesota State Building Code? If so, please list the affected parts of the Minnesota State Building Code. **No**

5. Who are the parties affected or segments of industry affected by this proposed code change? **Architects, Engineers, Building Owners**

6. Can you think of other means or methods to achieve the purpose of the proposed code change? If so, please explain what they are and why your proposed change is the preferred method or means to achieve the desired result. **No**

7. Are you aware of any federal requirement or regulation related to this proposed code change? If so, please list the regulation or requirement. **No**